



PARAWAY
PASTORAL CO.

Pollution Incident Response Management Plan

Nullamanna Feedlot
Nullamanna Road
Nullamanna NSW 2360

Prepared by:
Paraway Pastoral Company Limited
70 McNamara Street
Orange NSW 2800





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Background

This document has been prepared to comply with Paraway's obligations under the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) and Environmental Protection Licence No. 20901.

Under the POELA Act Licence holders are required to prepare, keep, publish, test and implement a Pollution Incident Response Management Plan (PIRMP). The objectives of the plan are to:

- Enable timely communication about a pollution incident to staff at the premises, Environment Protection Authority (EPA), other relevant authorities specified in the act (including local councils, NSW ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and any other persons outside the facility who may be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risk and development of actions to minimise and manage those risks.
- Ensure that the plan is properly implemented by training staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

A 'pollution incident' is an incident or set of circumstances 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 does not include an incident or set of circumstances involving only the emissions of any noise (EPA, 2012).

Incidents that cause or threaten the material environment harm are required to be notifiable environment incidents under the PIRMP.

Site Information

Site Operator:	Paraway Pastoral Company Limited
Address:	70 McNamara Street, Orange NSW 2800
Feedlot Location:	Nullamanna Road, Nullamanna NSW
Shire:	Inverell
EPA Licence Number:	20901



Figure 1 Site Location

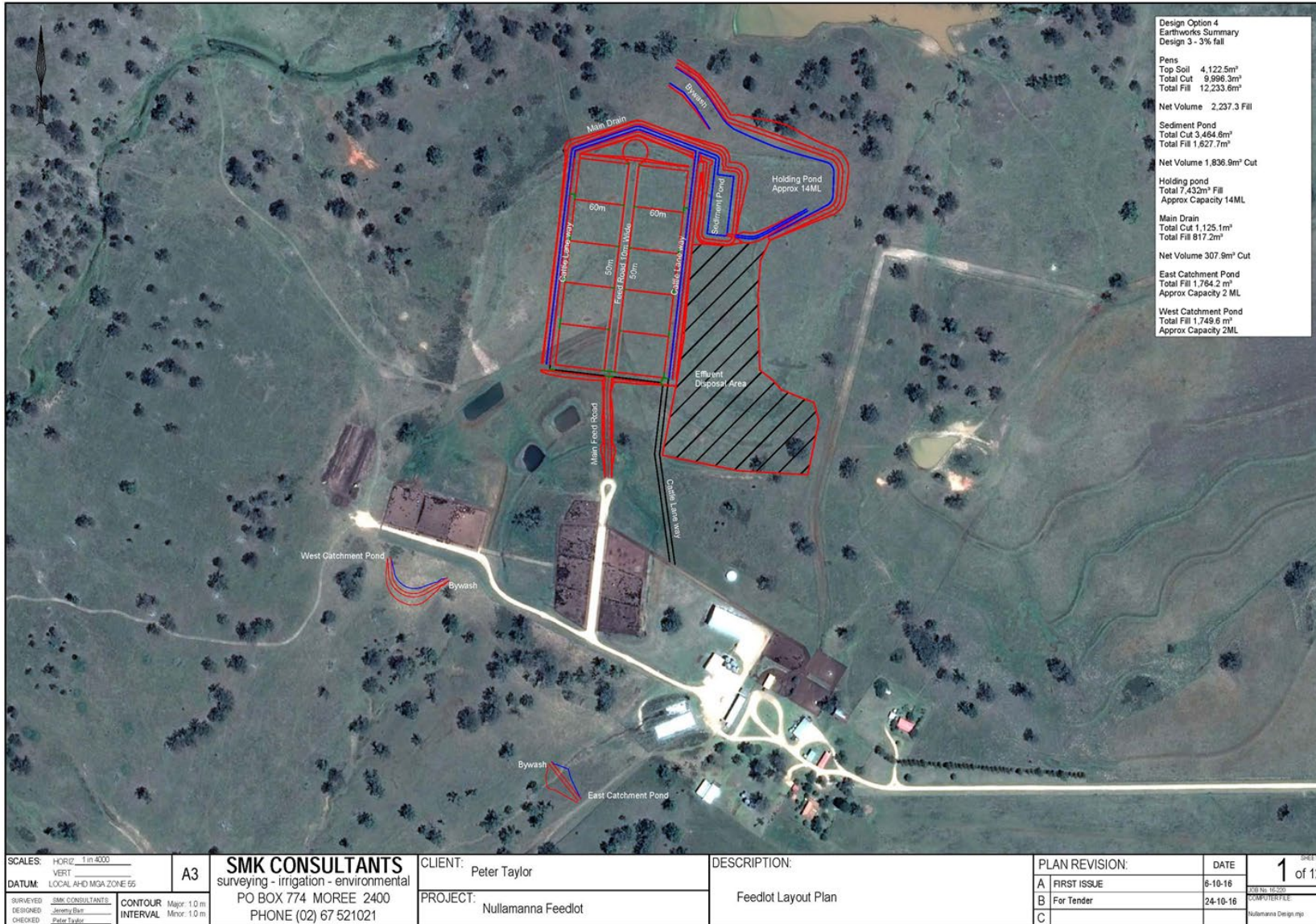


Figure 2 Site Features

Site Hazards

Site specific hazards have been identified to better manage a risk should one occur. A site near a sensitive environment must consider the increased risk of environmental or health impacts of a pollution incident.

Whilst the risks of the environmental hazards occurring at this site are low, we have pre-emptive actions in place that all employees and contractors are aware. The only hazards that do pose an increased risk are dust and odour, however there are controls and buffers to receptors to reduce the risk. These documents include Safe Work Procedures, company policies and procedures and onsite training through toolbox meetings, formal incident training in the field incident exercises.

Methodology of the Likelihood of Hazard Occurring

Step 1 – Consider the consequences		Step 2 – Consider the Likelihood		Step 3 – Calculate the Risk						
What are the consequences of this incident occurring? Consider what <u>could reasonably</u> have happened as well as what actually happened.		What is the likelihood of the consequence identified in Step 1 happening? Consider this without new or interim controls in place.		Take step 1 rating and select the correct column. Take step 2 rating and select the correct line. Circle the risk score where the two ratings cross on the matrix below. E= EXTREME, H = HIGH, M = MEDIUM AND L = LOW						
				CONSEQUENCES						
Consequence	Description	Likelihood	Description		Insignificant	Minor	Moderate	Major	Critical	
Critical	High level serious environmental harm	Very High	Once a week or more often	LIKELIHOOD	Very High	M	M	H	E	E
Major	Serious environmental harm	High	Once a month or more often		High	L	M	H	H	E
Moderate	Material environmental harm	Medium	Once a year or more often		Medium	L	L	M	H	E
Minor	Environmental nuisance	Low	Once in ten years or more often		Low	L	L	M	M	H
Insignificant	Minor consequence	Very Low	Once in 100 years or more often		Very Low	L	L	L	M	H

Potential Pollutants

Pollutant	Risk	Description	Control
Feedlot effluent	Medium	Discharge from effluent from storage ponds following heavy rain.	Should the storage ponds overflow they would discharge into a controlled drainage system, draining into a larger holding dam below. The drainage infrastructure has been sized for a 1 in 20-year, 24-hour storm event
Feedlot manure	Medium	Discharge of manure into waterways and offsite following heavy rain	Manure storage area receives minimal water run on and run off is intercepted by a diversion bund and directed to the main drain and sediment pond
Feedlot manure - odour	Low	Excessive odour from manure stockpiles	Manure is cleaned from feeding pens, stockpiled regularly turned to prevent anaerobic conditions
Excessive dust	Medium	Dust generated by wind, cattle and feedlot activities during periods of hot and dry conditions with low stocking densities pose an elevated risk to human health.	Water internal, unsealed roads and other trafficked areas as required. Soil amendment, water sprays or water cannons within yards and pens. Consider strategic planting of windbreaks and maintaining ground cover
Fuel or chemical spillage	Low	There is a low risk of any fuel or chemical spillage incident occurring on site given the adequate storage of fuel and other potentially hazardous chemicals within the machinery shed.	Fuel containers exceeding 200 litres in capacity to be stored in a secure weatherproof building or within a secondary containment compound able to contain 110% of the maximum volume of fuel stored and capture and fuel leaking from fittings or delivery hoses
Mass stock deaths	Low	Mass death of livestock from known or unknown sources	Appropriate PPE to be worn. Carcasses disposed of by burial or composting. Refer to Paraway procedures. Suspicious deaths must be reported to the disease watch hotline 1800 675 888



Inventory of Potential Pollutants

Potential pollutants held on station and include:

- Chemicals - All Chemicals must have a MSDS, be clearly labelled and stored in the appropriate class location. A spill kit must be kept close to the chemical shed. A wash station must be located adjacent to the shed. The chemical shed must be locked when not in use.
- Fuel - All fuel storage above 200L should have the appropriate bunding. A spill kit should be in place for minor spills. The tanks are set up with sight glasses that allow for the clear view of the liquids level and prevents an overflow.
- Animal Treatments - All animal treatments can be stored in a chemical shed but must be in a separate location. These also require MSDS and be clearly labelled.

All staff are advised on the location of the MSDS.

Minimising Harm

Health and safety is our number one priority. All staff are inducted into the Emergency Response Procedure. Staff are trained in safe working with hazardous chemicals and dangerous goods.

Personal Protective Equipment is available onsite for employees to use at any time. The PPE includes: Earmuffs, gloves, respirators, safety data sheets and eye protection. Emergency wash stations are in place. Staff must wear appropriate clothing and footwear. Numerous fire extinguishers, first aid kits and spill kits are available, and staff are trained in their location.

All contractors are inducted and advised of any onsite risks before they commence any work. It is a requirement that contractors use appropriate PPE.

Management and Responsibilities

Legal Duty to Notify

All employees are responsible for alerting the Manager of the property or other management personnel to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale.

The responsibility to notify EPA and other agencies is detailed in the POEO Act (Section 148), which encompasses all site personnel, including contractors and sub-contractors.

Site Responsibilities

The Manager of the property is accountable for the specific responsibilities associated with the management and implementation of this PIRMP.

Position	Name	Mobile
Site Manager	Gavin O'Neill	0428 255 648



The Manager will ensure the following actions are carried out:

- Assess the damage and recommend appropriate clean up and/or quarantine measures
- Advise the Paraway management personnel (below) who will notify the EPA (if required)

Position	Name	Mobile
Environment and Sustainability Manager	Paul McDougall	0414 344 464
General Manager	Stuart Johnston	0457 713 432

- Appoint appropriately qualified personnel to carry out clean up
- Complete an incident report and send a copy to the Environment and Sustainability Manager and General Manager

Pollution Incident Response Procedure

Industry is now required to report pollution incidents immediately to the EPA, and where relevant, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local Council. 'Immediately' means promptly and without delay.

If in the case of a pollution incident, the incident presents an immediate threat to human health or property the site must immediately contact 000 prior to any other action.

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 pose any threat to human health or property, concurrently with contacting 000, all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences.

See flow chart and explanatory notes below. Highlighted terms are explained below the chart.

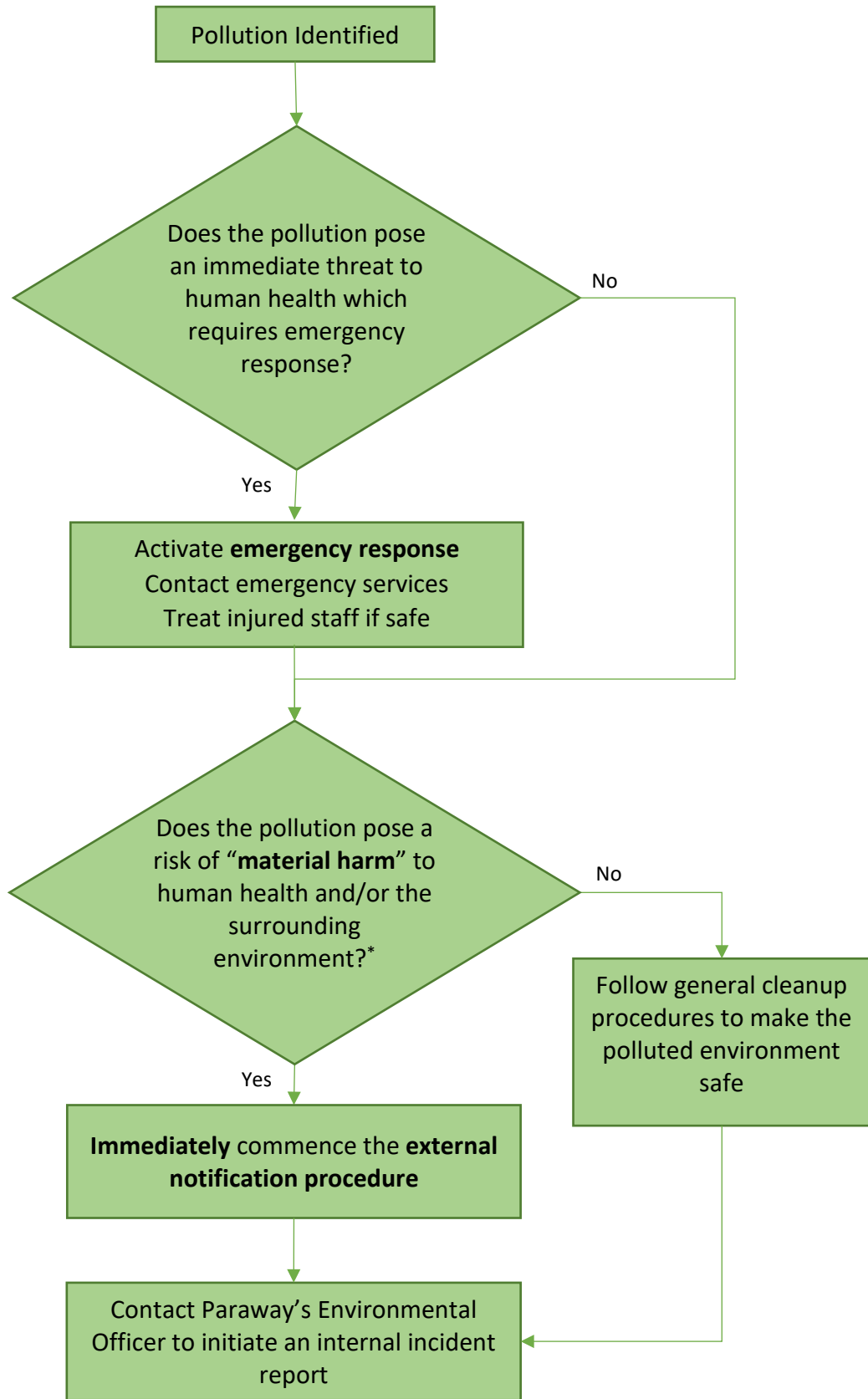


Figure 3 Incident Response Flowchart



Emergency Response

The steps to follow in an emergency include:

- Identify if the risk poses a threat to human health
- Notify the station manager immediately
- Ensure all staff and visitors are safe
- If needed call 000

Material Harm

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 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.

Immediate Notification

There is no definition of 'immediately' in the amended *POEO Act*. However, *the Second Reading Speech of the Protection of the Environment Legislation Amendment Bill*, and guidance on the changes to the *POEO Act* provided on the Office of Environment and Heritage website, state that the term immediately means '**promptly and without delay**'.

External Notification Procedure

When all personnel are deemed safe in an emergency, it is the responsibility of the designated person to contact the relevant external contacts.

During all pollution incidents the following persons must be contacted:

Position	Name	Mobile
Site Manager	Gavin O'Neill	0428 255 648
Environment and Sustainability Manager	Paul McDougall	0414 344 464
General Manager	Stuart Johnston	0457 713 432

The above contacts will advise which of the following will need to be contacted:

- EPA on 131 555
- NSW Health via the Tamworth Public Health Unit on (02) 67678630



- WorkCover NSW on 131 050
- Fire and Rescue NSW on 000
- Inverell Shire Council on (02) 6728 8288
- Disease watch hotline 1800 675 888

Training, Testing and Reviewing

This PIRMP is to be included in the onsite induction programme. The PIRMP must be tested annually and all staff are retrained as part of the annual testing and review program of procedures. The following will be implemented on site:

- an introduction to the PIRMP will be provided to staff at the time of their induction to the site.
- all staff members will be trained in the safe operation of the site.
- all staff members will have regular training in the use of equipment and effluent containment procedures.
- at least one emergency response drill will be conducted on site each year.
- the outcome of the drill is to be documented and retained.
- the outcome of the drill will be used to analyse and, if necessary, improve this PIRMP.

Testing and Review Register

A register will be maintained containing:

- the dates on which the plan has been tested and the name of the person who carried out the test,
- the dates on which the plan is updated,
- the updates that were made to the register.



Date	Action Type	Details	Completed By
19/5/2020	Update	Update of PIRMP to new template	PM/KC
8/4/2021	Review	Test and update	PM