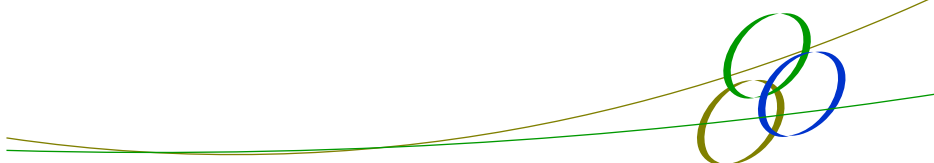


## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

*Prepared for Elf Farm Supplies  
Prepared by Environmental Property Services*

*108 Mulgrave Road, Mulgrave  
Lot 13 and 14 of DP 1138749*



## Table of Contents

1	Introduction .....	1
2	Aims and Objectives .....	2
3	Relevant Legislation, Policy and Guidelines .....	4
4	Description and Likelihood of Hazards .....	7
4.1	Definitions .....	7
4.2	Risk Identification, Assessment and Control.....	7
4.3	Hazard Matrix.....	8
4.4	Hazards.....	9
5	Pre-emptive Actions to be Taken .....	12
5.1	Corrective and Preventative Action Process.....	13
5.2	First Aid .....	16
5.2.1	DRABC .....	17
5.3	Fire Safety .....	18
5.4	Emergency Evacuation Procedure .....	19
5.5	Chemical Spill Procedure .....	20
5.6	Transport Pollution Incident Response.....	20
6	Inventory of Pollutants .....	21
7	Safety Equipment .....	22
7.1	Personal Protective Equipment .....	24
7.2	Fire Protection Equipment.....	25
8	Contact Details.....	26
8.1	Emergency Contact Details .....	26
8.2	Relevant Agency Details.....	27
9	Communicating with Neighbours and the Local Community .....	28
10	Minimising Harm to Persons on the Premises.....	30
11	Actions to be Taken During or Immediately After a Pollutant Incident .....	32
11.1	Notification of Emergencies and Incidents.....	32
11.2	Record of Environmental Incidents.....	34
11.3	Reporting Procedure.....	34
11.3.1	Hazard Reporting Procedure.....	34

11.4	Incident Investigation .....	34
11.5	Hierarchy of Control Measures .....	35
11.6	Review and Monitor.....	36
11.7	Clean-Up.....	36
11.8	Costs.....	36
12	Staff Training.....	37
12.1	Incident Management Training.....	37
13	Pollution Incident Response Management Plan Testing and Review.....	38

## Table of Figures

Figure 7-1: Spill Control Station and Signage – Elf Farm Site.....	22
Figure 7-2: Directive Drainage – Elf Farm Site .....	23
Figure 10-1: Risk Management Process.....	31

## List of Tables

Table 4-1: Hazard Risk Matrix .....	8
Table 4-2: Risk Rating Groups .....	9
Table 4-3: Hazard Identification.....	10
Table 5-1: Risk Identification and Preventative Measures .....	13
Table 5-2: DRABC Basic First Aid Steps .....	17
Table 6-1: Inventory of Pollutants .....	21
Table 7-1: List of Safety Equipment .....	23
Table 7-2: Personal Protective Equipment Specifications: Face Respirator .....	24
Table 7-3: Fire Protection Equipment.....	25
Table 8-1: Emergency Contact Details .....	26
Table 8-2: Agency Contact Details .....	27

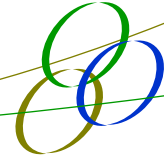
## Appendices

Appendix 5 – Chemical Spill Procedure

Appendix 6 – Transport Pollution Incident Procedure

WEBSITE VERSION

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# 1 INTRODUCTION

Elf Farm Supplies operates a mushroom substrate plant at 108 Mulgrave Road, Mulgrave. The substrate plant has been in operation since 1981, previously operating as Elf Mushroom Pty Ltd. The mushroom substrate plan covers an area of approximately 12.4 hectares, and is located across Lots 13 and 14 of DP 1138749. The site is a rectangular shaped parcel of land bounded by Blacktown-Richmond Railway to the south, and rural land to the west, south and east. Most of the northern site boundary abuts Mulgrave Road. The site is located within the Hawkesbury Council area.

Activities on the land are regulated under Environmental Protection Licence # L6229 issued by NSW Office of Environment and Heritage (OEH) in accordance with Section 55 of the *Protection of the Environment Operations Act 1997* (POEO Act). Scheduled activities identified on the licence include Composting and Waste storage.

In 2012, several changes were introduced to the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) to improve the way pollution incidents are reported, managed and communicated to the general community. Included in these changes was the requirement of all holders of an Environmental Protection License to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

In accordance with these legislative changes, and to ensure that Elf Farm Supplies is able to respond effectively and efficiently to any pollution incident occurring on site or extending off site, this PIRMP has been developed. This plan has been developed to prepare key personnel to provide and coordinate an effective response to ensure minimal disruption to the business operations, and the environment in the event of an incident.

The Plan has been written with a view to simplicity so that it can be implemented easily and effectively and be clearly translated by the employees and contractors of the company.

Elf Farm Supplies maintains that this policy will be continually discussed and reviewed to reflect any changes in workplace hierarchy or practice, with a formal review undertaken annually to implement any required amendments.



## 2 AIMS AND OBJECTIVES

Elf Farm Supplies is committed to ensuring that the safety and well-being of all employees, contractors and visitors is maintained at all times. This Pollution Incident Response Management Plan (PIRMP) has been prepared to:

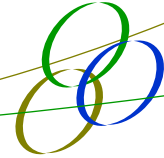
- Identify all potential hazards and their likelihood of occurring;
- Describe all pre-emptive actions to be taken to reduce this likelihood;
- Identify an exhaustive inventory of pollutants within the Elf Farm Supplies site;
- Describe the safety equipment used to minimise risk and/or harm;
- Provide a comprehensive list of contact details within Elf Farm Supplies;
- Provide a communication plan for the local community in case of emergency;
- Provide a plan of action to minimise risk and/or harm to persons in case of a pollution incident occurring; and
- Detail the nature and objectives of staff training within Elf Farm Supplies.

In keeping with the above aims, this PIRMP is consistent with the governing objectives. The regulatory intentions of the PIRMP are to:

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

Elf Farm Supplies endeavours to carry out the implementation and operation of the PIRMP in accordance with the following principles:

- **Openness about failures** – errors are reported and acknowledged without fear of inappropriate blame;
- **Obligation to act** – the obligation to take action to remedy problems is clearly accepted and the allocation of this responsibility is unambiguous and explicit;



- **Accountability** – the limits of individual accountability are clear, individuals understand when they may be held accountable for their actions;
- **Appropriate prioritisation of action** – action to address problems is prioritised and resources directed to those areas where the greatest improvements are possible; and
- **Teamwork** – is recognised as the best defence of system failures and is explicitly encouraged and fostered within a culture of trust and mutual respect.

The procedures contained within the PIRMP have been prepared to ensure that all risks and incidents are identified, mitigated and appropriate corrective actions put into place in the case of any incident occurring.

WEBSITE VERSION





### 3 RELEVANT LEGISLATION, POLICY AND GUIDELINES

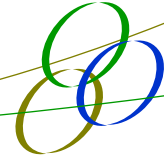
The need to prepare a Pollution Incident Response Management Plan applies to all holders of an Environmental Protection License. The Environmental Protection Authority (EPA) issues EPL's to the owners and operators of various industrial premises under the *Protection of the Environment Operations Act 1997* (POEO Act). An EPL contains a set of conditions relating to pollution prevention and monitoring, and cleaner production through recycling and reuse, and the implementation of best practice. Chapter 3 of the POEO Act specifically contains the legislative requirements pertaining to the issuing of EPL's.

As the holder of an EPL (# L6229), Elf Farm Supplies is required to prepare, test and implement a PIRMP, specifically in accordance with Part 5.7A of the POEO Act. Clause 153C of the Act lists the information to be included in the Plan, and has been read in conjunction with Clause 98C of the *Protection of the Environment Operations (General) Regulation 2009* which lists the form and details of the PIRMP.

Clause 153C of the POEO Act states:

*A Pollution Incident Response Management Plan must be in the form required by the regulations and must include the following:*

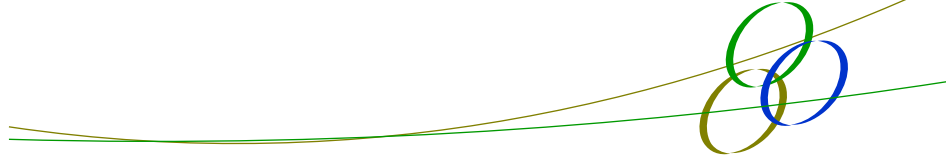
- (a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:*
  - (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and*
  - (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and*
  - (iii) any persons or authorities required to be notified by Part 5.7,*
- (b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,*
- (c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,*
- (d) any other matter required by the regulations.*



Clause 98C of the POEO(General) Regulation states:

*The matters required under section 153C (d) of the Act to be included in a plan are as follows:*

- (a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the **relevant activity**),*
- (b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,*
- (c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,*
- (d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,*
- (e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,*
- (f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,*
- (g) the names, positions and 24-hour contact details of those key individuals who:*
  - (i) are responsible for activating the plan, and*
  - (ii) are authorised to notify relevant authorities under section 148 of the Act, and*
  - (iii) are responsible for managing the response to a pollution incident,*
- (h) the contact details of each relevant authority referred to in section 148 of the Act,*
- (i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,*
- (j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,*
- (k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,*
- (l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,*
- (m) the nature and objectives of any staff training program in relation to the plan,*
- (n) the dates on which the plan has been tested and the name of the person who carried out the test,*
- (o) the dates on which the plan is updated, and*
- (p) the manner in which the plan is to be tested and maintained.*



Elf Farm Supplies has prepared this PIRMP in accordance with the above conditions and in concurrence with the Preparation of Pollution Incident Management Plans Guidelines issued by the Environmental Protection Agency in March 2012.

WEBSITE VERSION



## 4 DESCRIPTION AND LIKELIHOOD OF HAZARDS

In accordance with Clause 98C (1) (a) and (b) of the *Protection of the Environment Operations (General) Regulation 2009*, this section of the PIRMP details:

- A description of the main hazards to human health and the environment;
- The likelihood of these hazards occurring; and
- Details of any circumstances which would increase the chances of the risk occurring.

### 4.1 Definitions

As a precursor, the following definitions are provided:

- **Hazard** – a source of potential harm or a situation with the potential to cause loss or damage to human health, products/equipment and/or the environment;
- **Risk** – probability of a hazard resulting in injury, disease, property damage or environmental harm based on the exposure to the hazard, severity of the consequence and the likelihood of the scenario happening; and
- **Risk Management** – is the process of identifying and managing risk to avoid exposure or loss. It must be planned, systematic, timely and comprehensive enough to cover all potential hazards and risks, both to human health and the environment.

### 4.2 Risk Identification, Assessment and Control

The site shall identify and assess all hazards that have caused incidents using the following risk management methods:

- Defining the scope of the activity that is to be assessed;
- Identifying the risks;
- Assessing the risks;
- Controlling the risks; and
- Monitoring and reviewing the process.

The site shall implement all controls using the following hierarchy of hazard control:

- Eliminating the hazard;
- Substituting the hazard;
- Modifying the process;

- Isolating the hazard;
- Implementing engineering controls;
- Using a combination of controls; and
- Using back up controls, such as personal protective equipment.

Risks will be identified in terms of hazards. To determine the level of risk from a hazard, the likelihood and consequence of such a hazard occurring must be analysed.

Consequence will be defined according to the following criteria:

- Severe – Fatality, permanent disability, or irreversible environmental damage;
- Major – Serious injury, long-term illness, long-term environmental damage;
- Moderate – Medical treatment, short-term illness, short-term environmental damage; and
- Minor – First aid required, easily managed environmental damage.

Likelihood will be defined according to the following criteria:

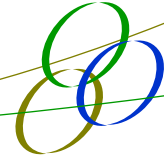
- Very Likely – the event could happen any time and has occurred several times;
- Likely – the event might occur sometimes; on average once a year;
- Unlikely – the event could happen, but very rarely; less than once a year; and
- Very Unlikely – this event could happen but has not occurred; knowledge of event from elsewhere.

### 4.3 Hazard Matrix

Potential risks for Elf Farm Supplies will be awarded a risk level in terms of a rating determined by using the matrix below:

Table 4-1: Hazard Risk Matrix

Severity	Likelihood			
	Very Likely Could happen any time	Likely Could happen sometime	Unlikely Could happen, but very rarely	Very Unlikely Could happen, but probably never will
Severe	1	1	2	3
Major	1	2	3	4
Moderate	2	3	4	5
Minor	3	4	5	6



**Table 4-2: Risk Rating Groups**

<b>High – 1 or 2</b>	<b>Medium – 3 or 4</b>	<b>Low – 5 or 6</b>
----------------------	------------------------	---------------------

The risk level at which the risk rating becomes acceptable (tolerable) will be when it is as low as reasonably practicable, being notionally a risk rating of 5 or 6.

## 4.4 Hazards

Elf Farm Supplies recognises that hazard identification is essential for effective risk management, and it is necessary to plan for, avoid and/or mitigate hazard impacts.

Table 4-3 below identifies all potential major hazards within the Elf Farm Supplies site, which have been analysed to determine their likelihood, consequence and to determine their risk rating. Two hazard identification tables are provided in this PIRMP, one in consideration of the risk without any control measures, and the second to categorise the residual risk after mitigation measures have been identified and implemented.

In identifying the potential hazards and associated risks, Elf Farm Supplies has had regard to all available information including:

- Previous incidents;
- Employee knowledge and experience;
- Number of employees potentially effected;
- Existing plant and equipment manuals;
- Legislation and regulations;
- Industry codes;
- SafeWork NSW guidance material; and
- All relevant Australian standards.

Further, Elf Farm Supplies is acutely aware of its geographical position, being located near sensitive flood plain lands, populated areas and bounded by significant infrastructure.

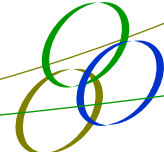
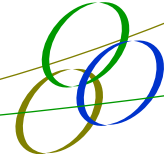


Table 4-3: Hazard Identification

Hazard	Likelihood of Hazard Occurring	Consequence	Activities which may increase the potential of the hazard occurring
Chemical Spill	Unlikely	Moderate	Vehicle Collision Plant failure Human error Transfer of substance
Contaminated Stormwater	Unlikely	Moderate	Excessive rainfall Vandalism Overflow of Stormwater Retention System/Dam
Fire	Unlikely	Major	Plant Failure Smoking Combustion Bushfire
Dust	Likely	Minor	Dry weather High traffic Wind
Noise	Unlikely	Minor	Plant failure High traffic
Diesel/ Fuel Spill	Unlikely	Minor	Infrastructure works Plant Failure Breaking caps Excavation Ground penetration Human error
Diesel/Fuel Fire	Unlikely	Major	Plant Failure Smoking Combustion Bushfire Diesel/Fuel Spill
Odour	Unlikely	Minor	Plant failure Dry/Wet weather Wind
Raw Material Spill	Likely	Minor	Handling error Equipment failure



Hazard	Likelihood of Hazard Occurring	Consequence	Activities which may increase the potential of the hazard occurring
Raw Material Fire	Unlikely	Moderate	Equipment Failure Combustion Bushfire Smoking Raw Material Spill Straw Bales

Table 4-3 above identifies 'chemical spill' as a potential hazard on site. A comprehensive list of these chemicals and other dangerous goods are kept in the Dangerous Goods (DG) Risk Management Register. A copy of this register is attached at Appendix 1.

Table 4-3 above also identifies 'raw material spill/fire' as a potential hazard on site. A comprehensive list of all raw materials used on site, including detailed specifications of each material type is attached at Appendix 2 of this Plan.

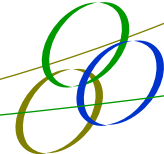




## 5 PRE-EMPTIVE ACTIONS TO BE TAKEN

The following documents, plans and actions have been implemented by Elf Farm Supplies to minimise or prevent any risk of harm to human health or the environment arising from activities taken on site:

- Implementation of Professionally Prepared:
  - Environmental Management Strategy; and
  - Pollution Incident Response Management Plan
- Site Management Plan Fire Safety Procedures:
  - Environmental Management Strategy;
  - Pollution Incident Response Management Plan;
  - Fire Protection Register; and
  - Fire Drills and clearly identified muster points
- Employee Induction and Training:
  - Induction and Training undertaken by all new employees; and
  - Contractor Induction Checklist
- Visual/Noise/Waste Screening
  - Native trees and shrubs planted to provide screening to neighbouring properties and drive by traffic
- Emergencies
  - Emergency Evacuation Procedure; and
  - List of emergency equipment by location
- Spill containment kits
  - Located at refuelling areas and diesel containers
- Site bunding
  - Used to direct hazardous material spills away from sensitive environmental areas
- High quality plant and machinery:
  - Frequent plant repairs and maintenance; and
  - Available plant and equipment manuals
- Areas kept vegetated for dust suppression
- Signage.



## 5.1 Corrective and Preventative Action Process

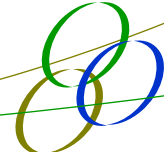
It is a requirement that a system be established to manage incidents in the long-term to ensure that appropriate follow up action is completed with the aim of improving environmental performance. The elements of the system are:

- Reporting and recording;
- Investigation; and
- Corrective actions including action plans.

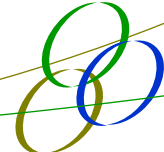
The likelihood for potentially significant environmental impacts to be reduced and/or the potential impacts mitigated by implementation of appropriate preventative measures. These preventative measures for potentially significant environmental issues relevant to the site are identified in the table below:

Table 5-1: Risk Identification and Preventative Measures

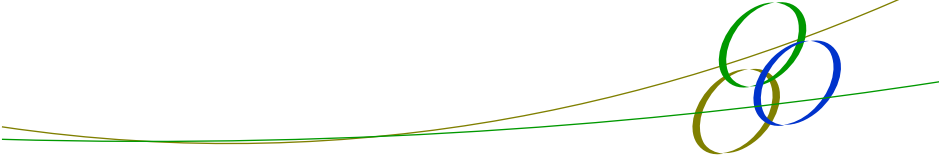
Risk	Impact	Preventative Action
<b>Chemical Spill</b>	Site contamination – onsite and off site Fire	<ul style="list-style-type: none"><li>• All areas containing hazardous chemicals are bunded to ensure containment of potential spills</li><li>• Labelled spill kits are readily available within bunded areas</li><li>• Repairs and maintenance</li><li>• Secure access to chemicals</li></ul>
<b>Contaminated Storm water</b>	Onsite and offsite contamination Impact on surrounding flood plain land	<ul style="list-style-type: none"><li>• Continual monitoring of water storage levels on site</li><li>• Stormwater Retention Basins</li><li>• Water recycling pits located on site</li><li>• Bunding</li><li>• Automated plant (pump stations)</li><li>• Physical barriers</li><li>• Out of hours contact and staff supervision</li></ul>
<b>Fire</b>	Air pollution Infrastructure damage Plant damage Human health issues	<ul style="list-style-type: none"><li>• Fire hoses are installed in all work areas</li><li>• Smoking and naked flames restricted to designated smoking areas</li><li>• Staff are trained in fire procedures</li><li>• Extinguishers are kept on all mobile plant and in each work area</li><li>• Diesel fuel is stored underground and in above ground tank segregated from other storage and processing areas</li><li>• The fuel dispensing area is sealed and bunded and has appropriate fire and hazard warning signs</li><li>• Secure flammable chemicals</li></ul>



Risk	Impact	Preventative Action
		<ul style="list-style-type: none"> <li>• Plant maintenance</li> <li>• Management of vegetation: grazing of surrounding paddocks to reduce fuel loads</li> <li>• Ground management for fire safety</li> <li>• Implementation of Fire Safety Manual and Evacuation Plans</li> </ul>
<b>Dust</b>	Air pollution Impact on nearby neighbours	<ul style="list-style-type: none"> <li>• Keep roads and surfaces sealed</li> <li>• Dry ingredients used on site are protected from direct wind</li> <li>• Non-operational areas are stabilised by hardstand areas, grassed or landscaped</li> <li>• Buildings and vegetation provide wind breaks to limit the effects of winds at a ground level within the plant</li> <li>• Traffic management</li> <li>• Road repairs</li> </ul>
<b>Noise</b>	Negligible Impact on nearby neighbours	<ul style="list-style-type: none"> <li>• Keep noise levels to within appropriate standards for day and night time works for surrounding properties</li> <li>• Best quality plant:               <ul style="list-style-type: none"> <li>○ All stationary noise making plant and equipment such as fans, pumps and conveyors are enclosed within buildings or structures</li> <li>○ Ventilation plant room, and all buildings walls designed and constructed with thick concrete-filled block extending to the height of the roof-line</li> <li>○ Insulated roofing</li> <li>○ Truck filling area surrounded by buildings to reduce travel of noise</li> <li>○ Plant design and equipment purchases guided by acoustic considerations and professional input</li> </ul> </li> <li>• Traffic management (best practice):               <ul style="list-style-type: none"> <li>○ Encourage truck drivers not to use exhaust brakes at night</li> </ul> </li> <li>• Adopt best management practice as endorsed by OEH</li> <li>• Road repairs</li> <li>• Ensure doors to operation areas are kept closed when not in direct use</li> <li>• Maintain and repair equipment where necessary to meet original specifications for noise attenuation</li> </ul>
<b>Diesel/Fuel Spill</b>	Human health impacts Onsite and Offsite environmental damage and contamination	<ul style="list-style-type: none"> <li>• All fuel is stored in isolated, banded, double skinned tanks</li> <li>• Refuelling takes place on porous concrete surfaces to assist in absorbing any contaminants in a spill</li> <li>• Spill decks and spill kits are located next to all diesel tanks and refuelling areas</li> </ul>



Risk	Impact	Preventative Action
	Fire	<ul style="list-style-type: none"> <li>In the case of escaping spill contaminants, overflow is channelled into a site wide drainage system feeding back to appropriate liquid recycling pits</li> <li>In this instance, pump directing flow to recycling pit is switched off and the fuel/hazardous substance is extracted from the drainage pit via extraction pumps</li> </ul>
<b>Diesel/Fuel Fire</b>	Plant damage/failure Human health impacts Offsite environmental damage and contamination	<ul style="list-style-type: none"> <li>Prohibition of smoking and naked flames to reduce risk</li> <li>Dry chemical extinguishers located at all refuelling stations and diesel tanks</li> <li>Appropriate staff are trained in fire safety management</li> <li>Staff handling fuel are provided with appropriate Personal Protective Equipment</li> <li>All mitigation and prevention measures listed above</li> </ul>
<b>Odour</b>	Air pollution Impact on nearby neighbours	<ul style="list-style-type: none"> <li>Manage all aspects of operations to keep odour emissions as low as possible and always within the limit specified in the environmental protection licence</li> <li>A bio-scrubber to remove odorous compounds from exhaust air prior to release to atmosphere</li> <li>Discharge exhaust 40 metres above ground through chimney</li> <li>Clean up any spillages daily</li> <li>Regular odour sampling and testing in accordance with the monitoring program outlined in EPL #6229</li> </ul>
<b>Raw Material Spill</b>	On site environmental damage Fire	<ul style="list-style-type: none"> <li>Not all raw material is considered hazardous, however hazardous raw material is stored isolated from other materials</li> <li>Product is ordered on a routine 'just-in-time' basis to reduce amount of stock held on site at any one time</li> </ul>
<b>Raw Material Fire</b>	Plant damage/failure Human health impacts Offsite environmental damage and contamination	<ul style="list-style-type: none"> <li>Materials kept in cool areas</li> <li>Materials kept in well ventilated areas</li> <li>Prohibition of smoking and naked flames to reduce risk</li> <li>Appropriate staff are trained in fire safety management</li> <li>Fire hoses are installed in all work areas</li> <li>Extinguishers are kept on all mobile plant and in each work area</li> <li>Secure flammable chemicals</li> <li>Implementation of Fire Safety Manual and Evacuation Plans</li> </ul>



The team of management will be responsible for providing staff with guidance on the implementation of effective measures to appropriately manage and reduce the occurrence of the potentially significant impacts identified above.

## 5.2 First Aid

In the event of a pollution incident impacting on the health of a person, the following procedure must be followed:

- Contact emergency services: This may only apply if the person has suffered a serious injury of the situation is classified as an emergency;
- Contact Elf Farm Supplies Operations Manager, General Manager and/or Production Managers: Elf Farm Supplies has four appointed managers who are available 24 hours a day;
- Contact the next of kin of the person injured as soon as possible. Please note: If a very serious injury has occurred, no notification should be given to the next of kin. Notification should be made by a member of the Police Force on advice from medical personnel;
- Conduct senior First Aid (if required). A number of staff members have been trained in senior first aid. Remember: DRSABCD (outlined below); and
- Report incident: any incident requiring first aid must be recorded as per company procedures.

In an emergency, the following basic procedure must be followed:

In an **EMERGENCY** contact:

**AMBULANCE**

**FIRE**

**POLICE**

DIAL **000**

(or **112** from a Mobile Telephone)

Required Information:

1. Your name and company name
2. Your location/emergency location
3. Type of emergency and assistance required

### 5.2.1 DRSABC

A summary of basic first aid steps in accordance with the DRSABCD principle are outlined below:

Table 5-2: DRABC Basic First Aid Steps

<b>D</b>	<b>DANGER</b> 'Check for Danger'	Ensure there is no immediate danger to: <ul style="list-style-type: none"><li>• Yourself</li><li>• Others around you</li><li>• The victim</li></ul>
<b>R</b>	<b>RESPONSE</b> 'Check for a response from the victim'	Try to get the victim to respond to you to find out whether the victim is conscious or unconscious. Methods used to check for a response: <ul style="list-style-type: none"><li>• Ask the victim their name and what happened</li><li>• Gently squeeze the persons hands or tap the shoulders/face of the victim</li><li>• Ask the victim if they are hurt or injured, and where</li></ul>
<b>S</b>	<b>SEND</b> 'Send for help'	Dial 000 for all emergency services, or ask someone to call them on your behalf while you're assisting the victim. Call the Elf Farm Supplies General Manager, Operations Manager and/or Productions Manager
<b>A</b>	<b>AIRWAY</b> 'Check the airway'	Check the airway of the victim is open and clear. To open the airway, tilt the head of the victim and lift their chin. It is important to check there are no objects obstructing the airway of the victim.
<b>B</b>	<b>BREATHING</b> 'Check to see that the victim is breathing'	Look and feel the lower chest of the victim to see if it is moving up and down as an indication that they are breathing. If the victim IS breathing: <ul style="list-style-type: none"><li>• Roll the victim into the recovery position until an ambulance arrives.</li></ul> If the victim is NOT breathing: <ul style="list-style-type: none"><li>• Start breathing for the victim using rescue breaths.</li></ul>
<b>C</b>	<b>CIRCULATION</b> 'Undertake cardiopulmonary resuscitation'	Do NOT undertake this step unless you have undergone formal first aid training.  Chest compressions combined with rescue breaths can help resuscitate the victim and get the blood circulating. Note: the amount of breaths to compressions, and amount of pressure to exert is different for adults, children and babies.
<b>D</b>	<b>DEFIBRILLATION</b> 'Check for a defibrillator'	A defibrillator is a machine that shocks the heart into normal rhythm. Elf Farm Supplies does not have a defibrillator on site so this step must be left to emergency medical personnel to perform.



## 5.3 Fire Safety

While substrate production is not a high fire risk due to its high moisture content, Elf Farm Supplies takes fire safety and fire preventative measures very seriously. As a result, a fire management strategy has been prepared for the site identifying the following matters:

- Procedures to follow in the event of fire;
- Alarm systems;
- Equipment available on the premises;
- Responsibilities of personnel;
- Fire brigade contact details;
- 6 monthly testing of equipment;
- Signposting for flammable storage and firefighting equipment; and
- Staff training for fire emergencies.

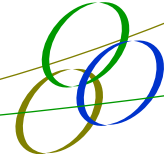
In addition to this Elf Farm Supplies have installed or made available the following equipment and processes to minimise the risk of fire:

- Fire hoses are installed in all work areas;
- Extinguishers are kept on all mobile plant and in each work area;
- Staff are trained in fire procedures;
- Diesel fuel is stored underground and in an above ground tank segregated from other storage and processing areas; and
- The fuel dispensing area is sealed and bunded and has appropriate fire and hazard warning signs.

Some specific fire safety procedures conducted by Elf Farm Supplies include:

- Checking the “charge level” of all fire extinguishers on site at a minimum of 6 monthly intervals; and
- All fire extinguishers will be serviced and maintained by competent persons and a record completed and maintained in accordance with Australian Standard AS-1851.

A copy of the Fire Safety Procedure and Fire Protection Register for Elf Farm Supplies is attached at Appendix 3.



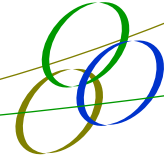
## 5.4 Emergency Evacuation Procedure

Elf Farm Supplies has in place an Emergency Evacuation Procedure to ensure the safety of all people on site in the event of a fire, explosion or the occurrence of any other emergency. This procedure applies to all potential pollution hazards.

1. When you become aware of a site emergency contact office staff and your supervisor immediately, in person, by mobile, by BOWS or by CB radio;
2. Notify emergency services by phoning 000;
3. The person identifying the emergency is responsible for the following:
  - Fire: evaluate if fire can be controlled. If it can, do so using approved emergency equipment,
  - Explosion: Ensure the safety of personnel in proximity to the area. Assess damage.
  - Other: Assess the situation and take appropriate action where possible to ensure personnel safety. Assess damage. Send/position personnel to direct emergency services to the incident site.
4. Office staff are to communicate the emergency to Phase I and Phase II Production Managers and the Workshop Manager or in their absence the most senior person on the site in each of these sections;
5. All staff, contractors and visitors who are not involved directly in the emergency situation are to quickly assemble at the EAST END OF THE CARPORT;
6. Chief Fire Warden, (or in his absence the Operations Manager) is responsible to account for all people on site including visitors listed in the visitor's book;
7. Chief Fire Warden is responsible to liaise with emergency services, account for people etc;
8. Supervisors (or their delegates) are responsible to ensure all personnel in their area of control are made aware of the situation and congregate at the emergency evacuation assembly point at the front gate. Communication may be by mobile phone, CB radio, BOWS or in person; and
9. No person will leave the emergency evacuation point or return to the premises/work area until the Chief Fire Warden or their delegate has given the ok.

A copy of the Emergency Evacuation Procedure, including the post emergency procedure is attached at Appendix 4.





## 5.5 Chemical Spill Procedure

Elf Farm Supplies has in place a Chemical Spill Procedure to ensure all staff members are guided to effectively manage chemical spills on site. Most importantly, it is necessary to notify management of a spill as soon as it is reasonably practicable to do so. A copy of the Chemical Spill Procedure is attached at Appendix 5.

## 5.6 Transport Pollution Incident Response

Elf Farm Supplies has in place a Transport Pollution Incident Procedure to cover any potential pollution incident during the transfer of substrate material from the site. It is the duty of all drivers working for Elf Farm Supplies to ensure the notification of Elf Farm Supplies management as soon as is reasonably practicable of any incident that results in a loss of fuel or substrate from the confines of the vehicle. A copy of the Transport Pollution Incident Procedure is attached at Appendix 6.

## 6 INVENTORY OF POLLUTANTS

As a requirement of the PIRMP environmental guidelines, a detailed inventory of pollutants is required for the Elf Farm Supplies site. Elf Farm Supplies has an existing Dangerous Goods Risk Management Register which lists all hazardous material and potential pollutants stored on site. This register is periodically updated and provides a consistent and streamlined register of dangerous materials on site.

For the sake of consistency, this register has been attached at Appendix 1, and should be regarded as the full inventory of pollutants. Table 6-1 below provides a summary of this register for completeness.

**Table 6-1: Inventory of Pollutants**

Item	Quantity
<b>Diesel Fuel Above Ground</b>	Less than 52,000 litres
<b>Diesel Fuel Below Ground</b>	Less than 20,000 litres
<b>Acids</b>	Less than 20, 000 litres
<b>Chemicals used for cleaning and production</b>	Less than 1,000 litres
<b>Stormwater Retention Basins</b>	More than 10,000 litres
<b>Raw Materials</b>	
<b>Gypsum</b>	Less than 100 tonnes
<b>Cotton Seed</b>	Less than 150 tonnes
<b>Straw Bales</b>	Less than 1,500 tonnes
<b>Stable Bedding</b>	Less than 70 tonnes
<b>Urea</b>	Less than 20 tonnes
<b>Feather Meal</b>	Less than 25 tonnes
<b>Chook Manure</b>	Less than 350 tonnes

A detailed map has been prepared identifying the storage locations of each pollutant on site. A copy of the map is attached at Appendix 7.

## 7 SAFETY EQUIPMENT

Elf Farm Supplies has in place a number of safety equipment measures to prevent and mitigate potential incidents impacting the environment or human health.

General safety measures and equipment installed on the site includes:

- **Spill Kits:** Spill kits containing an appropriate absorbent (Gypsum) are located at the refuelling areas of the farm. Appropriate signage clearly marks the location of such kits;
- **Spill Pallets:** Spill pallets are utilised at Elf Farm within storage areas to contain within the pallet any spill or leaks of hazardous materials;
- **Bunding:** Bunding is used to direct hazardous material spill away from stormwater drains; and
- **Directive Drainage:** The Elf Farm site has been specifically designed and engineered to provide graded drainage points and water recycling pits.

Figure 7-1 below identifies a spill control station located on site including the appropriate signage, and Figure 7-2 illustrates the directive draining design on site:



Figure 7-1: Spill Control Station and Signage – Elf Farm Site



**Figure 7-2: Directive Drainage – Elf Farm Site**

A detailed list of safety equipment is contained in Table 7-1 below. The accompanying map references are in reference to the Safety Equipment Location Map attached at Appendix 12.

In addition to the equipment listed in Table 7-1 below, Elf Farm Supplies has a number of portable fire extinguishers, fire hydrants and fire hose reels located throughout the site. A copy of the Fire Extinguisher Location Map is attached at Appendix 13, and a copy of the Fire Hydrant and Hose Reel Map is attached at Appendix 14.

**Table 7-1: List of Safety Equipment**

Equipment	Map Reference
Personal Protective Equipment	A
Spill kits	B
Spill Pallets	C
Water Recycling Pits	D
Bunding	
Directive Drainage System	
Stormwater Retention Basins	
Signage	Throughout site
Water	Throughout site



## 7.1 Personal Protective Equipment

All staff are required to wear appropriate, company supplied, PPE equipment when engaging in activities with products containing potentially harmful properties. The following PPE is worn in accordance to the stipulations set out in those individual product's Material Safety Data Sheets:

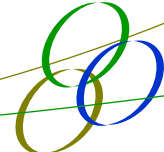
- **Respiratory Equipment:** 3M supplied re-usable, full face respirator. Meets the Australian and New Zealand standards (1716) when used in conjunction with 3M filters. Please see specifications of 3M Full Face Respirator 6000 series in Table 7-2 below;
- **Protective gloves:** Gloves are provided to prevent skin contact with any chemicals that may be used;
- **Steel capped boots:** Elf Farm Supplies provide all employees with steel capped boots in line with Clause 44 of the *Work Health and Safety Regulation 2011*; and
- **Safety Glasses:** Splash proof safety glasses provided to employees to avoid chemicals contacting the eyes.

Table 7-2: Personal Protective Equipment Specifications: Face Respirator

3M™ Full Face Reusable Respirator 6000 Series	Maximum Use Concentration
P2 Particulate Filters	50 x Exposure Standard
P3 Particulate Filters	100 x Exposure Standard
Class 1 Gas and Vapour Filter	50 x Exposure Standard or 1000 ppm (whichever is lower)
Class 2 Gas and Vapour Filter	100 x Exposure Standard or 5000 ppm (whichever is lower)
Air Supplied System	> 100 x Exposure Standard up to Immediately Dangerous to Life and Health Atmospheres

Management must ensure that:

- Professional advice is obtained, where necessary, to identify the most suitable types of PPE for the tasks to be carried out;
- Training is provided to supervisors and employees to enable them to ensure the proper selection, fit, use, cleaning and maintenance of PPE;
- Supervision and enforcement of the PPE policy is undertaken;
- Evaluation of the effectiveness of the PPE program is carried out on a regular basis; and
- Suitable PPE is provided for visitors who may be exposed to hazards in the workplace.



## 7.2 Fire Protection Equipment

The following fire protection equipment is located on site:

Table 7-3: Fire Protection Equipment

Location	Type of Equipment and number		
	Hose	CO2	Powder
	Reel	Extinguisher	Extinguisher
<b>Workshop</b>		1	4
<b>Phase I</b>			
Phase I Fan Area	2		2
Phase I Ingredient Storage Area	2		
Phase I Plant Room			2
Western Wall of Phase I Hall	1	1	
Southern End of Prewet Shed			1
At PA Doors of Prewet Shed (externally located)	2		
Phase I Lunch Room			1
Laboratory			1
Mobile Blender			2
<b>Phase II</b>			
Phase II Hall	3	4	
Phase II Lunchroom			1
Electrical Switch Room		1	
Chiller Room	1		1
Fan Room - Mezzanine Floor	3	4	
<b>Phase III</b>			
Phase III Hall	4	3	1
<b>Administration</b>		1	1
<b>Blocking</b>			
Blocking Shed	2	3	2
Loading Dock	2		1

## 8 CONTACT DETAILS

The Elf Farm Supplies Board has ultimate responsibility for the development and operation of the Mulgrave substrate plant. Reporting to the Board is the Management Team.

Elf Farm Supplies can be contacted using the following phone numbers:

- Office Hours: **(02) 4577 5000**
- 24-Hour Complaints Line: **1800 155 079**

### 8.1 Emergency Contact Details

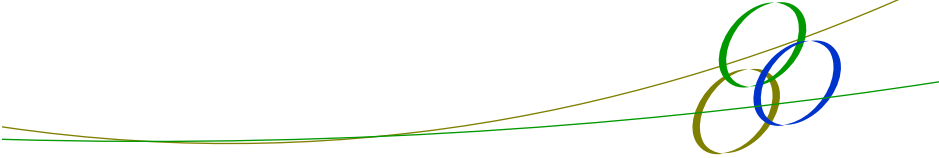
Table 8-1: Emergency Contact Details

Agency	Contact Details
<b>NSW Police Force</b>	Windsor 13 Mileham Street Windsor 2756 Phone: 02 4587 4099 Fax: 02 4587 4011 Open 24 hours
<b>Ambulance Service</b>	Emergency Contact: 000 Mobile Phone: 112 Available 24 hours
<b>Fire Brigade</b>	Windsor 19 Fitzgerald Street Windsor NSW 2756 Phone: 02 4577 3182

All emergency personnel must be informed of the following information:

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





Any information that is not known at the time of notification of the emergency personnel must be reported to these authorities immediately after becoming known.

## 8.2 Relevant Agency Details

Table 8-2: Agency Contact Details

Agency	In case of	Contact Details
<b>Hazmat</b>	Hazardous material incident	Hazmat Advice Unit Phone: 02 9995 5959 Email: Hazmat@environment.nsw.gov.au
<b>Environmental Protection Authority</b>	All pollution incidents	EPA Head Office PO Box A290 Sydney South, NSW 1232. Phone: 131 555
<b>Penrith Public Ministry of Health Unit</b>	Pollution incident causing personal harm	Phone: 4734 2022 After 5pm Phone: 4734 2000 Westmead Hospital, ask for Public Health Officer on call
<b>SafeWork NSW</b>	Pollution incident causing personal harm	Phone: 13 10 50
<b>Hawkesbury City Council</b>	Pollution incident with offsite environmental impacts	Phone: 4560 4444

All relevant authorities must be informed of the following information:

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

Any information that is not known at the time of notification of the relevant authorities must be reported to these authorities immediately after becoming known.





## 9 COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

Elf Farm Supplies recognises that consultation can play a major role in ensuring landowners, neighbours and local residents are informed in any pollution incident within the Elf Farm Supplies site. Ultimately, consultation can be utilised to mitigate and minimise any misunderstandings within the public realm. Because of this, Elf Farm Supplies is committed to ensuring the surrounding neighbours and local community are informed of any pollution incident that may occur on site. This section identifies the premises immediately surrounding the site, and the consultation methods that will be undertaken following any pollution incident.

Surrounding premises include:

- Mulgrave railway station (unmanned);
- Mulgrave village;
- Mulgrave industrial estate; and
- Chisholm Place, Windsor (Residential area).

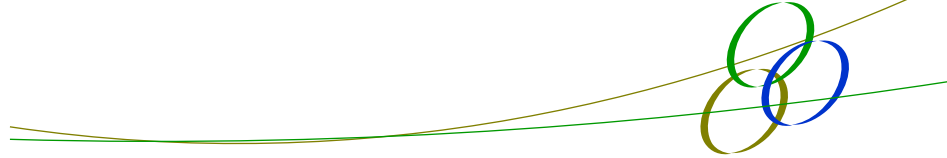
The surrounding premises and their locations are identified in the Substrate Plant Location Map attached at Appendix 8.

In case of an environmental incident the following consultation and communication methods will be used:

- Company representatives will personally notify members of the premises about the situation;
- Information statements regarding any safety measures will be prepared and issued to neighbouring properties; and
- Neighbouring properties and residents can utilise the 24 hour complaints line for instances where site operations cause concern.

This line is: **1800 155 079**

While every attempt will be made to comfort and inform local community members, there remains potential for landowners and the wider community to be inconvenienced or unconvinced of the pollution incident.



Elf Farm Supplies aims to manage and respond to these concerns by:

- Providing team members with the ability to respond to general enquiries about the pollution incident, and resolve basic concerns and complaints;
- Ensure team members are aware of issues/complaints that may impact the operation of the site; and
- Ensure a consistent approach across the board by all team members.

WEBSITE VERSION



## 10 MINIMISING HARM TO PERSONS ON THE PREMISES

In addition to measures such as Personal Protective Equipment outlined above, Elf Farm Supplies has an effective risk management process to minimise potential harm to person on the premises. The Risk Management process is used by management in consultation with employees to logically and systematically manage the risks associated with hazards in the workplace and in systems of work.

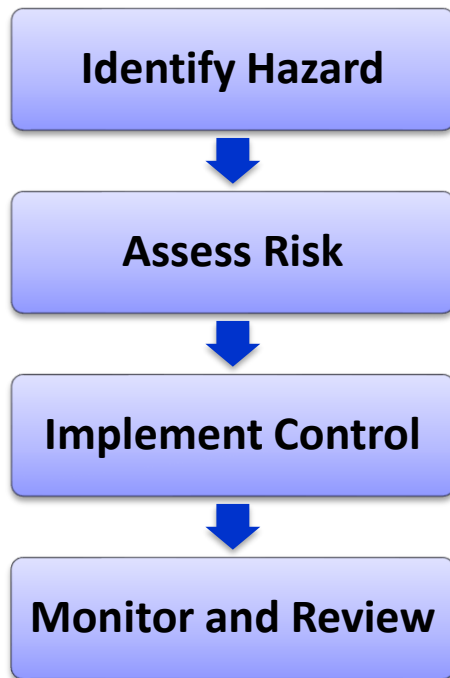
Elf Farm Supplies recognises that involving staff in the risk management process is an essential step in making the workplace safe.

Employees are responsible to immediately identify hazards to management, eliminate hazards immediately if possible, work safely and not put themselves or others at risk.

The risk management process is used:

- To Assess the current workplace and systems of work;
- Prior to setting up and using a workplace;
- When planning new work processes;
- Before installing, commissioning or erecting plant;
- Whenever changes are made to the workplace, the systems or method of work, plant and equipment or the chemicals used; and
- Whenever new information regarding work processes becomes available.

The risk management process operates as follows:



**Figure 10-1: Risk Management Process**

The following measures are implemented to reduce harm to persons on site:

- Contracted and subcontracted workers are required to review all documentation relating to safe work procedures prior to commencement of any on-site work activities;
- Staff must undergo relevant training; a detailed account of staff training programs is included in section 13 below;
- Fire drills are carried out annually, including audible testing of the fire alarm and employees are required to attend the assigned muster points;
- All hazardous substances and dangerous goods on premises are labeled as hazardous, and signage pertaining to a hazard is clearly discernible to all staff members and visitors;
- Dangerous goods are kept sealed and away from combustible items and ignition sources;
- Smoking and naked flames are prohibited within the site;
- Plan testing is regularly undertaken to ensure procedures are followed correctly and allow identification of alterations to plans. A copy of the Pollution Incident Response Plan Test Register is attached at Appendix 9; and
- All personnel are supplied and trained with PPE relevant to any potential hazards that may arise on site. A complete record of the supplied PPE is retained in worker files.



## 11 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTANT INCIDENT

This section of the Plan outlines the actions that will be taken by Elf Farm Supplies immediately after a pollutant incident to reduce or control the pollution impacts. A pollutant incident is defined as:

*An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.*

Warnings, updates and actions to be taken during or after such an incident have been considered and detailed below.

### 11.1 Notification of Emergencies and Incidents

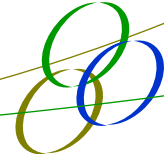
As a legislative requirement, the Manager must **IMMEDIATELY** notify the EPA of a pollution incident in the following circumstances:

- If the actual or potential harm to the health or safety of human beings or ecosystems is not minor; and
- If actual or potential loss or property damage (including clean-up costs) associated with a pollution incident exceeds \$10,000.

The EPA pollution line is: **131 555**

Pollution incidences that could constitute 'material harm' include, but are not limited to:

- Chemical spills such as:
  - Diesel Fuel; and
  - Acid;
- Fire; and
- Overflow of contaminants into waterway.



As soon as practicable after notifying the EPA, the General Manager and any other relevant agency must be notified and provided with the following details:

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

Within seven days of the initial notification a detailed report of the incident must be given to the General Manager and any other relevant agency.

Relevant agencies include:

1. **Fire and Rescue NSW**, the NSW Police and/or the NSW Ambulance Service (if the incident presents an immediate threat to human health or property)  
Contact Number: 000
2. **Penrith Public Ministry of Health Unit**  
Contact Number: 4734 2002  
Contact Number (After 5:00pm emergency number): 9845 555  
(Westmead Hospital; Ask for Public Health Officer on call)
3. **SafeWork NSW**  
Contact Number: 13 10 50
4. **Hawkesbury City Council**  
Contact Number: 4560 4444  
Contact Number (After 5:00pm emergency number): not supplied

Note: Any information that is not known at the time of notification of the relevant authorities must be reported to these authorities immediately after becoming known.



## 11.2 Record of Environmental Incidents

The Operations Manager is to document any environmental incidents that occur. The following information is to be recorded in the environmental journal, where applicable:

- the location of the incident;
- the name and telephone number of the person reporting the incident;
- the time of incident;
- the suspected cause of the incident;
- the environmental harm and/or environmental nuisance caused, threatened or suspected to be caused by the incident; and
- actions taken to prevent any further occurrence and mitigate any environmental harm and/or nuisance caused by the incident.

The Elf Farm Supplies reporting procedure is outlined below.

## 11.3 Reporting Procedure

### 11.3.1 Hazard Reporting Procedure

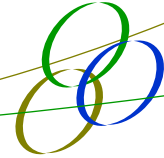
All employees have a responsibility to report workplace hazards. Supervisors and Managers have a responsibility to ensure all personnel are trained in this procedure and hazards are controlled using the documented OHS Risk Management Procedure, and Hazard Reporting Procedure. A copy of these procedures is attached at Appendix 10 and Appendix 11 respectively.

## 11.4 Incident Investigation

Elf Farm Supplies employee's and supervisors have the following responsibilities to investigate, report and mitigate pollution incidents:

### **Employees Responsibilities:**

- It is the employee's responsibility, as soon as they become aware of a hazard where material harm to the environment is caused or threatened, to notify the supervisor immediately of the incident; and
- If the supervisor cannot be immediately notified, it is the duty of the employee to notify all relevant authorities as listed in section 12.1 above.



### **Supervisor's Responsibilities:**

- Upon receiving notification of a hazard from an employee, notifying all relevant authorities of a hazard where material harm to the environment is caused or threatened, and ensuring they detail the hazard in a report form, the supervisor makes an assessment of the Risk Class of the hazard. This is to determine the appropriate level of response required to protect the health and safety of the workers i.e. immediate, within 24hrs, within 48hrs etc.
- The Supervisor then decides what Controls are required. Should the area be closed off for immediate rectification? Is a temporary control measure needed?
- Supervisor establishes a Corrective Action and deadline;
- Supervisor implements corrective action (may be by delegation);
- Supervisor's Manager confirms corrective action in place. The hazard is now controlled;
- The Supervisor and Manager sign off the Hazard Report; and
- The Hazard is reviewed to ascertain the Root Cause and establish if further action is required to prevent recurrence.

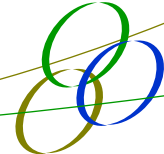
## **11.5 Hierarchy of Control Measures**

The Elf Farm Supplies hierarchy of control measures is as follows:

1. Elimination – this is a permanent solution and should be the first option;
2. Substitution – can another process, piece of plant or chemical with a lower risk be used as an alternative;
3. Engineering controls – changing the structure of the plant to prevent persons being exposed to the hazard eg guarding of machines;
4. Isolation – separate the person from the plant eg operate plant from an enclosed booth
5. Administrative controls – provision of safe working procedures, routine maintenance, supervision, pre-operational checklists, training, job rotation, etc; and
6. Personal protective equipment – Personal protective equipment (PPE) shall only be used as a short term control measure or as a supplement to other measures used, eg hearing and eye protection, gloves, safety footwear.

When all risks associated with a hazard have been identified and prioritized the organization will decide on which of the above control options is appropriate and who will be responsible for implementing such controls, given the degree of risk using the hierarchy of control. A hazard may use more than one method of control.





## 11.6 Review and Monitor

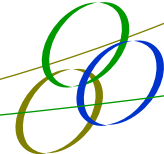
Controls shall be monitored and reviewed on a regular basis to ensure that controls implemented are effective, being used correctly and that the risk is reduced. The analysis of implemented controls will be made available to anyone who requests them in a hard copy form. Risks will be re-evaluated when there is evidence that the risk assessment is no longer valid, changes are made to the work environment, plant, equipment or processes, or an accident or incident occurs. Completing the risk assessment process will ensure that Elf Farm Supplies will meet their commitment for continuous improvement in the safety realm.

## 11.7 Clean-Up

Any foreseeable environmental incident will be managed via Elf Farm Supplies' extensive in-house resource pool, in a manner compliant with the relevant legislation and guidelines. External resources will be sought to provide additional support for internal procedures if deemed necessary by Elf Farm Supplies management.

## 11.8 Costs

The costs associated with any foreseeable environmental incident at Elf Farm Supplies has been considered and deemed manageable via the utilisation of in-house funding.



## 12 STAFF TRAINING

All staff employed at the Mulgrave substrate plant are trained in their responsibilities. Any new operational personnel are given refresher training by the plant manager. New office personnel are trained by the general manager. Refresher training is provided as required with a maximum time between training of two years.

Staff members undergo off-site training for handling hazardous materials via Chemcert Chemical Training. This course covers a range of chemical handling procedures including the proper application of chemicals, basic chemical safety rules, transport, handling and storage of chemicals, and preparation for application of chemicals. The company's staff training register is constantly reviewed to ensure as many staff as is reasonably practicable have undergone such training.

Fortnightly toolbox talks involving both employees and management are undertaken to ensure the opportunity to confront any safety issues, environmental or otherwise. A record of such talks is kept on site for follow-up purposes.

### 12.1 Incident Management Training

Staff training procedures related to pollution incident notification is contained within the Hazard Reporting Procedure attached at Appendix 11.

The procedure gives detailed descriptions of procedures in regards to reporting a pollution incident, identifying the severity of the incident and taking action in relation to rectifying the pollution incident.



## 13 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

### TESTING AND REVIEW

In accordance with the legislative requirements, Elf Farm Supplies has a two-part review system for the Pollution Incident Response Management Plan:

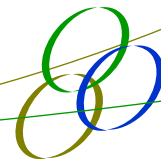
#### **Formal Review:**

Elf Farm Supplies is committed to an annual review of this Pollution Incident Response Management Plan. The PIRMP is to be formally reviewed prior to the 1<sup>st</sup> of June each year. This version of the PIRMP is to be formally reviewed and updated prior to the **1<sup>st</sup> of June 2019**.

Plan must be tested within one month of any pollution incident occurring and in light of that incident, review the plan for accuracy and to ensure the plan is still capable and effective.

#### **Informal Review:**

The plan will be informally tested at regular intervals by appropriately qualified personnel to ensure the plan functions as anticipated. These regular tests will be recorded in the Pollution Incident Response Plan Test Register as attached at Appendix 9. If the test indicates a particular procedure is not functioning as anticipated, site management will amend the procedure and the PIRMP accordingly. A copy of the test register will be kept on site at all times.



## **Appendix 5**

### *Chemical Spill Procedure*

WEBSITE VERSION

# ***Chemical Spill Procedure***



Elf Farm Supplies Pty Ltd  
Document Management System  
*EFS.OHS.048*  
Issue Date: 10.10.12

Procedure Setup by:            Nicholas Fittock  
Position held at EFS:        Assistant Manager

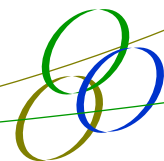
At any time that a chemical or fuel spill occurs it is necessary to ensure that the spill remains contained and does not run off into stormwater drains and waterways. The spill must also be handled in line with that specific substance's MSDS requirements. **Always consult the Dangerous Goods Risk Management procedure before attempting containment. A copy can be found in all Safe Work Procedure folders on site.**

Spill kits can be located in the Workshop and at all of the 3 Re-fuelling stations on site. The spill kits located at the refueling stations contain gypsum, an inert substance capable of soaking up large spills. The spill kit in the workshop contains soc, pad and pillow style absorbents. Soft bunding can also be located with these spill kits.

Liberally apply the absorbents to the spill area and make use of the portable bunds to control the flow of the spilt material. All spillage must be collected and stored in appropriate, sealable containers prior to disposal. Ensure that recovery is completed in a safe and practical manner i.e. via vacuum, and that all necessary Personal Protective Equipment is used at all times during recovery.

It is necessary to ensure management is notified of the spill as soon as it is reasonably practicable to do so.

**If a quantity of the spill does make its way into the drains or storm waterways management must be informed immediately.**



## **Appendix 6**

### *Transport Pollution Incident Procedure*

WEBSITE VERSION

## ***Transport Pollution Incident Procedure***



Elf Farm Supplies Pty Ltd  
Document Management System  
*EFS.OHS.049*  
*Issue Date: 08.05.2013*

It is the duty of all drivers working for Elf Farm Supplies to ensure the notification of Elf Farm Supplies management as soon as is reasonably practicable of any incident that results in a loss of fuel or substrate from the confines of the vehicle.

Details to be passed on include **location of incident** and an approximation of the **quantity of material** that has been lost.

Elf Farm Supplies management will then contact the Environmental Protection Authority immediately and forward the details of the situation.

This procedure applies at all times in which the employee is completing a task for Elf Farm Supplies.

Driver:.....

Signature: .....