

Enfield Pollution Incident Response Management Plan

MAU-HSE-PLN-SYD-10-98

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1. Scope

This Pollution Incident Response Plan (PIRP) has been developed to describe MAURI – Enfield’s response to a potential pollution incident and to meet the requirements of the Protection of the Environment Operations Act (POEO Act 1997)

The PIRP covers the Enfield site which has an Environmental Protection Licence (EPL).

The plan covers description of potential hazards, actions to be taken to prevent additional environmental harm and details of communication required in the event of an incident. The plan is based on a risk assessment for the site.

2. Definitions

Pollution	<p><i>pollution</i> means:</p> <ul style="list-style-type: none">(a) water pollution, or(b) air pollution, or(c) noise pollution, or(d) land pollution.
Pollution incident	<p><i>A pollution incident</i> means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.</p> <p>It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.</p> <p>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:</p> <ul style="list-style-type: none">(a) harm to the environment is material if:<ul style="list-style-type: none">(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

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3. Responsibilities

Site Manager	Jamal Waris
Site HSE Business Partner	Joshua Goldsmith
Quality Manager	Madhu Shekhwat
Flour Mill Manager	Charles McGrillen
Warehouse Supervisor	Gayellen White
WAN Mill Manager	Kobus Tolken
Environment Advisor	Brendan Cornell
Chief Warden	Chris Moog
Wardens	As per warden list

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4. Description and Likelihood of hazards at Enfield

Potential pollution incidents identified include:

Ref #	Item #	Item Sub #	Assessment Type	Area	Aspects	Impacts	Controls in Place	Current Risk Rating
1000	1	a	Aspect Assess	Grain Receipt (Road & Rail)	Receival of Wheat	Dust entering adjaocent properties	Location, Vehicles Covered, Cleaning.	LOW
1000	1	b	Aspect Assess	Grain Receipt (Road & Rail)	Receival of Wheat	Dust Explosion	Dust Collectors, Preventative Maintenance, Hot Work Permits	LOW
1000	2	a	Aspect Assess	Grain Intake & Movement	Wheat movement on site	Dust entering adjaocent properties	Dust Collectors, Preventative Maintenance, Machinery within buildings & Cleaning	LOW
1000	2	b	Aspect Assess	Grain Intake & Movement	Wheat movement on site	Dust Explosion	Dust Collectors, Preventative Maintenance, Hot Work Permits	LOW
1000	3	a	Aspect Assess	Grain Cleaning	Cleaning of Wheat	Dust entering adjaocent properties	Dust Collectors, Preventative Maintenance, Aspiration System, Machinery within buildings & Cleaning	LOW
1000	3	b	Aspect Assess	Grain Cleaning	Cleaning of Wheat	Dust Explosion	Dust Collectors, Preventative Maintenance, Hot Work Permits	LOW
1000	4	a	Aspect Assess	Grain Milling	Milling of Wheat	Dust entering adjaocent properties	Dust Collectors, Preventative Maintenance, Mill controlled by pneumatic System, Machinery within buildings & Cleaning & Inspection of plant each shift	LOW
1000	4	b	Aspect Assess	Grain Milling	Milling of Wheat	Dust Explosion	Dust Collectors, Preventative Maintenance, Hot Work Permits	LOW
1000	5	a	Aspect Assess	Packing of finished product	Packing Flour	Dust entering adjaocent properties	Preventative maintenance of equipment, dust collection system in place. All machinery within enclosed buildings. Good housekeeping practices.	LOW
1000	5	b	Aspect Assess	Packing of finished product	Packing Flour	Dust Explosion	Dust collection system throughout intake area. Preventative maintenance undertaken. Hot Work Permits	LOW
1000	6	a	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Dust entering adjaocent properties	Preventative maintenance of equipment, dust collection system in place. All machinery within enclosed buildings. Good housekeeping practices.	SUB
1000	6	b	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Dust Explosion	Dust collection system throughout intake area. Preventative maintenance undertaken. Hot Work Permits	LOW
1000	7	a	Aspect Assess	Millmix Collection	Millmix Packing	Dust entering adjaocent properties	MillMIX shed located in central location on site in dedicated confined area (shed). Curtain area around truck when loading. Area cleaned regularly with manual and mechanical sweeping.	SUB
1000	7	b	Aspect Assess	Millmix Collection	Millmix Packing	Dust Explosion	Dust collection system throughout intake area, preventative maintenance undertaken.	LOW
1000	8	a	Aspect Assess	Cleaning	Cleaning of Mill	Dust entering adjaocent properties	All dust contained within buildings. Good housekeeping practices. Manual and mechanical sweeping. Minimal blowing down with compressed air.	LOW
1000	9	a	Aspect Assess	Waste Bins & Bags	Rubbish Removal	Dust entering adjaocent properties	Emptied daily. Most product bagged before disposal.	MOD
1001	4	a	Aspect Assess	Grain Milling	Milling of Wheat	Industrial noise pollution to neighbouring properties / businesses	All plant enclosed within buildings. Regular noise surveys undertaken to monitor trends & implement noise control reduction strategies. Visual inspection of plant each shift.	LOW
1001	5	a	Aspect Assess	Packing of finished product	Packing Flour	Industrial noise pollution to neighbouring properties / businesses	All plant enclosed within buildings. Regular noise surveys undertaken to monitor trends & implement noise control reduction strategies.	LOW
1001	6	a	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Industrial noise pollution to neighbouring properties / businesses	Bulk outload area located within buildings on site(buffering noise). Majority of trucks loaded from 6am – 2pm.	LOW
1001	6	b	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Atmospheric noise from diesel blower engines unloading at customer's premises	Engine enclosed within noise retardant material, noise checks undertaken by external contractor, truck deliveries between 7am – 6pm.	LOW
1001	6	c	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Negative public image / community outrage	Immediate incident investigation upon receipt of complaint	LOW
1001	7	a	Aspect Assess	Millmix Collection	Millmix Packing	Industrial noise pollution to neighbouring properties / businesses	Millmix shed located in central location on site in dedicated confined area (shed). Majority of truck movement during normal work hours.	MOD
1001	7	b	Aspect Assess	Millmix Collection	Millmix Packing	Compressed Air Usage	Leaks monitored and rectified, maintenance contract with external company.	LOW
1001	8	a	Aspect Assess	Waste Bins & Bags	Rubbish Removal	Industrial noise pollution to neighbouring properties / businesses	Serviced at approximately 8am each morning – generally only 1 or 2 tips, bins back on to unoccupied car park (at this time of day)	LOW
1001	9	a	Aspect Assess	Maintenance	Maintenance of Plant	Atmospheric noise generation	Majority of maintenance undertaken in workshop or within buildings	LOW
1001	10	a	Aspect Assess	Warehouse & Distribution Activities	Warehouse & Transport of Product	Industrial noise pollution to neighbouring properties / businesses	Truck deliveries & receipts between 8am and 4pm, location of vehicles not on perimeter of site, Trucks loaded & unloaded within enclosed dock.	LOW
1002	1	a	Aspect Assess	Grain Receipt (Road & Rail)	Receival of Wheat	No Risks Identified		N/A
1002	2	a	Aspect Assess	Grain Intake & Movement	Wheat movement on site	Compressed air usage - Resource reduction – energy lost	Maintenance undertaken by internal maintenance personnel.	LOW
1002	2	b	Aspect Assess	Grain Intake & Movement	Wheat movement on site	Electricity usage - Resource reduction	Site has power factor correction. High efficiency motors fitted when replaced. Equipment switched off when not in use. Equipment is correctly sized for application. High efficiency lights installed when replaced. Plant operates in off peak periods in preference to peak.	LOW
1002	3	a	Aspect Assess	Grain Cleaning	Cleaning of Wheat	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance undertaken by internal maintenance personnel.	LOW

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1002	3	b	Aspect Assess	Grain Cleaning	Cleaning of Wheat	Electricity usage - Resource reduction	Site has power factor correction. High efficiency motors fitted when replaced. Equipment switched off when not in use. Equipment is correctly sized for application. High efficiency lights installed when replaced. Plant operates in off peak periods in preference to peak.	LOW
1002	4	a	Aspect Assess	Grain Milling	Milling of Wheat	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance undertaken by internal maintenance personnel.	LOW
1002	4	b	Aspect Assess	Grain Milling	Milling of Wheat	Electricity usage - Resource reduction	Site has power factor correction. High efficiency motors fitted when replaced. Equipment switched off when not in use. Equipment is correctly sized for application. High efficiency lights installed when replaced. Plant operates in off peak periods in preference to peak.	LOW
1002	5	a	Aspect Assess	Packing of finished product	Packing Flour	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance undertaken by internal maintenance personnel.	LOW
1002	5	b	Aspect Assess	Packing of finished product	Packing Flour	Electricity usage - Resource reduction	Site has power factor correction. High efficiency motors fitted when replaced. Equipment switched off when not in use. Equipment is correctly sized for application. High efficiency lights installed when replaced. Plant operates in off peak periods in preference to peak.	LOW
1002	6	a	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance undertaken by internal maintenance personnel.	LOW
1002	6	b	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Electricity usage - Resource reduction	Site has power factor correction. High efficiency motors fitted when replaced. Equipment switched off when not in use. Equipment is correctly sized for application. High efficiency lights installed when replaced. Plant operates in off peak periods in preference to peak.	LOW
1002	7	a	Aspect Assess	Milmmix Collection	Milmmix Packing	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance undertaken by internal maintenance personnel.	LOW
1002	8	a	Aspect Assess	Warehouse & Distribution Activities	Warehouse & Transport of Product	Electricity Usage – Resource Reduction	Site has power factor correction. High efficiency lights installed when replaced.	LOW
1002	9	a	Aspect Assess	Cleaning	Cleaning of Mill	Compressed air usage - Resource reduction – energy lost due to leaks	Maintenance contract with external company	LOW
1003	1		Aspect Assess	Grain Reveal (Road & Rail)	Receival of Wheat	Spill or leaking of grain from trucks on route to site – Negative public image, community outrage.	Grain trucks covered when delivering grain. Trains fully enclosed.	LOW
1003	2		Aspect Assess	Grain Intake & Movement	Wheat movement on site	No Risks Identified		N/A
1003	3		Aspect Assess	Grain Cleaning	Cleaning of Wheat	No Risks Identified		N/A
1003	4		Aspect Assess	Grain Milling	Milling of Wheat	No Risks Identified		N/A
1003	5		Aspect Assess	Packing of finished product	Packing Flour	No Risks Identified		N/A
1003	6	a	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Spills or leaks of product / dust from vehicles in transport / at	Regular maintenance of vehicles. Good housekeeping practices (cleaning tools in trucks). Cleaning of trucks before leaving site where possible.	MOD
1003	6	b	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Spills or leaks of product / dust from vehicles in transport / at	Immediate response to complaints	MOD
1003	7		Aspect Assess	Milmmix Collection	Milmmix Packing	No Risks Identified		N/A
1004	1	a	Aspect Assess	Grain Reveal (Road & Rail)	Receival of Wheat	Fuel tanks and oil on delivery trucks - Ground and stormwater	Spill kits throughout site. All relevant employees trained in hazardous substance use including spill kits, ground asphalted.	LOW
1004	2		Aspect Assess	Grain Intake & Movement	Wheat movement on site	No Risks Identified		N/A
1004	3		Aspect Assess	Grain Cleaning	Cleaning of Wheat	No Risks Identified		N/A
1004	4		Aspect Assess	Grain Milling	Milling of Wheat	No Risks Identified		N/A
1004	5		Aspect Assess	Packing of finished product	Packing Flour	No Risks Identified		N/A
1004	6	a	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Diesel or oil leaks from trucks on/off site	Spill kits located on site near truck movement areas. Regular maintenance of vehicles.	LOW
1004	6	b	Aspect Assess	Outload and transport of bulk flour	Packing & Transporting Bulk Flour	Negative public image/community outrage	Immediate response to complaints.	MOD
1004	7	a	Aspect Assess	Milmmix Collection	Milmmix Packing	Fuel tanks and oil on delivery trucks - Ground and stormwater	Spill kits throughout site. All relevant employees trained in hazardous substance use including spill kits, ground asphalted.	LOW
1004	8		Aspect Assess	Warehouse & Distribution Activities	Warehouse & Transport of Product	No Risks Identified		N/A
1004	9	a	Aspect Assess	Cleaning	Cleaning of Mill	Hazardous substance Storage/Usage - ground.	All hazardous substances stored in secure cabinets. Spill kits available throughout site. Current MSDS available for all. Employees trained in hazardous substance use.	LOW
1004	10	a	Aspect Assess	Quality Management	Product Quality	Hazardous substance Usage – contamination of ground.	Minimal use due to use of NIR for testing. Stored in secure cupboard. Current MSDS available for all. Spill kits available throughout site. Employees trained in hazardous	MOD

Ref #	Item #	Item Sub #	Assessment Type	Area	Aspects	Impacts	Controls in Place	Current Risk Rating
1004	11	a	Aspect Assess	Maintenance	Maintenance of Plant	Hazardous substance Storage & Usage – contamination of ground, stormwater system to neighbouring properties and businesses	All hazardous substances stored in bunded storage sheds or locked cabinets. Spill kits available throughout site. Current MSDS available for all. Employees trained in hazardous substance use.	MOD
1004	12	a	Aspect Assess	Fumigation	Pest Control	Hazardous substance Storage & Usage – contamination of ground.	All hazardous substances stored in bunded storage sheds or locked cabinets. Spill kits available throughout site. Current MSDS available for all. Employees trained in	MOD
1004	13	a	Aspect Assess	Sales	Sales	Fuel/oil leaks from vehicles off/on site	Vehicles maintained regularly. Spill kits available on site.	LOW
1001	1	a	Aspect Assess	Grain Reveal (Road & Rail)	Receival of Wheat	Atmospheric noise from truck movement, truck reversing beepers, roller doors, tipping of grain	Located in centre of site. Truck movement from 5am – 5pm only.	LOW
1001	2	a	Aspect Assess	Grain Intake & Movement	Wheat movement on site	Atmospheric noise from plant & machinery	All plant enclosed within buildings. Machinery only operates when truck is tipping grain. Regular noise surveys undertaken to monitor trends & implement noise control reduction strategies.	LOW
1001	3	a	Aspect Assess	Grain Cleaning	Cleaning of Wheat	Industrial noise pollution to neighbouring properties / businesses	All plant enclosed within buildings. Regular noise surveys undertaken to monitor trends & implement noise control reduction strategies.	LOW
1001	10	b	Aspect Assess	Warehouse & Distribution Activities	Warehouse & Transport of Product	Industrial noise pollution to neighbouring properties /	Site area used for forklift movement is isolated from neighbouring properties with buffers in place (silos etc). Majority of forklift movement between 7am – 4pm, forklift	LOW

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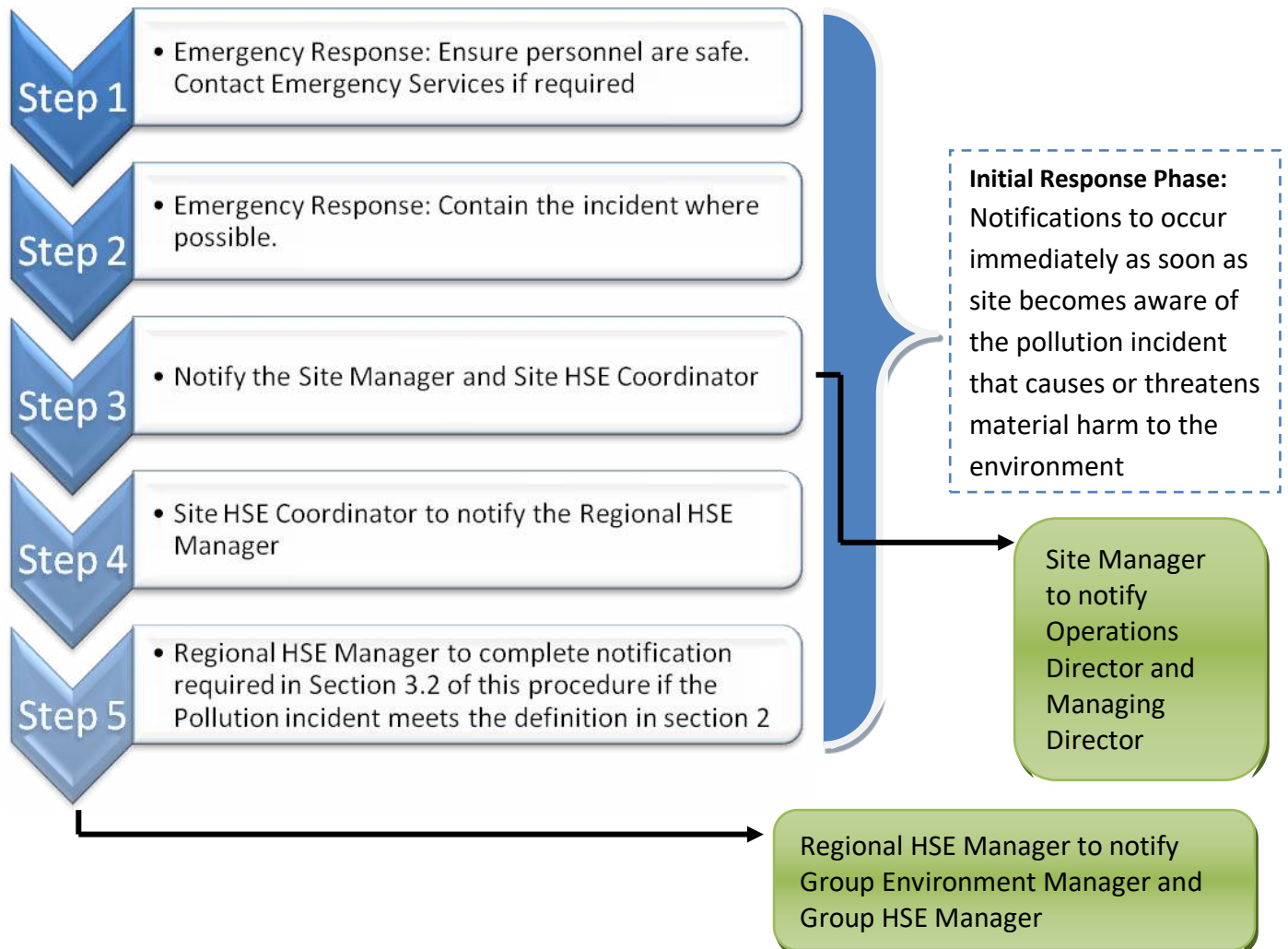
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5. Incident Management Procedure

5.1. In the event of a pollution incident:



Refer to GWF Incident/Injury Reporting and Recording Procedure and Incident Investigation Procedure requirements following the initial incident response phase.

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5.2 Notification to External Parties

The following table outlines the contact details and correct sequence for notification in the event of a notifiable pollution incident. Notification should be made by the most senior person available. (Contact Group Environment if available)

Authority		Contact Details
EPA	Environmental Line	131515
Ministry of Health	Eastern Zone (Camperdown Office) Public Health Unit	Ph: 02 9515 9420 Fax: 02 9515 9440 Fax: 02 9515 9467 (s) After hours: Ph: 02 9515 6111 (Royal Prince Alfred Hospital) - ask Public Health Officer on call PO Box 374, Camperdown 2050
SafeWork NSW		131050
Fire and Rescue NSW (Police, Fire, Ambulance)	(to be notified of an incident that is not an emergency)	000
Local Council	Strathfield Municipal Council	(02) 9748 9999 (24 hours, 7 days per week)

5.3. Information given to Authorities

- 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
- 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
- Other information prescribed by the regulations

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5.4. Communicating with Neighbours and Local Community

In the event of a notifiable incident neighbouring properties will be door knocked or phoned to advise of the situation. The nature and direction of the incident will determine the most appropriate properties to be notified. The Site Chief Warden will allocate the appropriate personnel to contact the relevant neighbours as per the site emergency response plan.

The MAURI website lists the Customer Service number (1800 206 219). Members of the public can call this number if they have a complaint or enquiry.

Neighbour	Location	Contact details
Coles Express Service Station	Braidwood St/Hume Hwy, Sth Strathfield	9642 8560
Formula 1 Hotel	Hume Hwy, Sth Strathfield	9642 0666
KFC	Hume Hwy, Sth Strathfield	9742 6321
McDonalds	Gould St/Hume Hwy, Sth Strathfield	9742 6334
Western Containers	23/25 Gould Street, Sth Strathfield	9742 6302
Westside Concrete Constructions	U1, 6 Braidwood St, Sth Strathfield	9642 3333
Fratelli's Fresh Pasta	U2, 6 Braidwood St, Sth Strathfield	9742 3269
Etna Bakery	U3, 6 Braidwood St, Sth Strathfield	9742 5866
Zonie Construction	U1/ 6-20 Braidwood St, Sth Strathfield	9642 7676
PHJ Plumbing	U5/ 6-20 Braidwood St, Sth Strathfield	9642 6788
Lonaport P/L	U8/ 6-20 Braidwood St, Sth Strathfield	975808966
SmartHeat	U9/ 6-20 Braidwood St, Sth Strathfield	1300 186 667
Trade Ocean International	U10/ 6-20 Braidwood St, Sth Strathfield	9642 8887
Ross Mitchell & Associates	U12/ 6-20 Braidwood St, Sth Strathfield	9642 0011 or 1300 798 808
Carl's Glass Service	U13/ 6-20 Braidwood St, Sth Strathfield	9642 1479 or 0411 325 365
Power Floors	U14/ 6-20 Braidwood St, Sth Strathfield	9642 2138

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Neighbour	Location	Contact details
Ausbrothers Import & Export	U16/ 6-20 Braidwood St, Sth Strathfield	9742 6400
Yammine Constructions	U17/ 6-20 Braidwood St, Sth Strathfield	0419 032 320
IGagu	U18/ 6-20 Braidwood St, Sth Strathfield	9742 3220
Dasco Australia	U19/ 6-20 Braidwood St, Sth Strathfield	9758 7100
Softcom Web Solutions	U22/ 6-20 Braidwood St, Sth Strathfield	9642 2924
Prosper Socks & Accessories	U23/ 6-20 Braidwood St, Sth Strathfield	9758 7533
Winmax	U24/ 6-20 Braidwood St, Sth Strathfield	0414 678 615
South Strathfield High School	Hedges Ave/Hume Hwy, Sth Strathfield	9642 4422
Various residential areas to the west and north of the site.		

NOTE: Phone numbers are current as at the date of this document.

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5.5. Minimising harm to persons on the premises

Refer to Site Emergency Response Plan – Appendix 2. At all times minimising harm to persons shall be a priority.

Role	Name	Contact details
Site Leader	Jamal Waris	0420 917 650
Chief Warden	Chris Moog	0450 445 129

NOTE: Phone numbers are current as at the date of this document.

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

Refer to Site Emergency Response Plan (Appendix 2), GWF Incident/Injury Reporting and Recording Procedure (Appendix 3) and GWF Hazard and Risk Management Procedure (Appendix 4).

6. Risk Control

6.3. Pre-emptive actions to be taken are site cleaning on a daily basis, dust collectors within plant, storm water retention ponds and shut off valve at end of site, spill kits throughout the site.

The most likely forms of pollution incident are Dust, storm water contamination, Noise and spill within the site.

6.4. Inventory of Pollutants

- Grain Dust.
- Noise.
- Diesel (Road & Rail).
- Liquefied Chlorine Gas.
- LPG.

6.5. Safety Equipment

Spill kits are available on site.

Plant and equipment are available to create additional bunding in the event of significant sediment runoff or a fuel spill using material available on site. Any material used for bunding will be assessed in accordance with the Waste Classification Guideline for appropriate disposal.

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6.6. Product Safety and Quality control

The impact of risk to product from a pollution incident is to be evaluated by the most senior quality person on site and Site leader using a food safety and quality risk assessment. This risk assessment must cover risk to;

1. Product already sent to customers
2. Finished product in warehouse
3. Product in storage
4. Contamination of raw materials
5. Risk of recommencing production.

Should a risk to product that has already been produced exist the Food Safety and Quality incident procedure must be followed and customers notified within 24 hours.

The risk assessment must define corrective action required. Production is not to be recommenced until corrective action determined through the risk assessment has been completed. Verification of the corrective action will be completed and signed off by the Site Manager and Quality Manager.

6.7. Training, Testing and Review.

The Site Management team will review the PIRP after 12 months and any updates required from the findings of the review will be completed. Testing the plan will be carried out at the time of the Business Continuity Review All staff will be trained in the PIRP and records maintained at the site. A copy of this plan will be uploaded to the MAURI website and kept within the site Environmental folder.

Also refer to Site Training Matrix and Training procedure.

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7. Site Maps – Appendix 1



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Reviewed by Attendees in conjunction with the BCP Plan and the Emergency Response Plan 18.06.2020

HSE Business Partner (Chair) Joshua Goldsmith
HSE Partners Debra Tucker
Maintenance Manager Chris Moog
Production Manager Charlie McGrillen
Site Leader Jamal Waris
WAN Manager Jacobus Tolken
Quality Manager Madhu Shekhwat
Warehouse Manager Gayellen White
WAN Team Leader Narleen Ruhe