



DEVRO

ENVIRONMENTAL POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN			
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Pollution Incident Response Management Plan

for

Devro Australia Pty Ltd



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1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy pollution reporting obligations under the *Protection of the Environmental Operations Act 1997* (POEO ACT). This plan outlines the classification, testing, reporting and management requirements of an environmental pollution incident.

2. Scope

The PIRMP applies to Devro's plant operations at Vale Road Bathurst. The scope is to provide a reference document for the implementation of pre-emptive management actions, the location of hazardous materials, emergency response actions, communication procedures, safety equipment requirements and personnel responsibilities.

This plan has been developed in accordance with the "*Environmental Guidelines: Preparation of pollution incident response management plans*" EPA NSW 2012.

3. Background

Devro is a leading international provider of collagen products for the food industry. Devro has two manufacturing facilities in Australia, both located in Bathurst, NSW. The Vale Road facility processes hides to obtain collagen. The Kelso process plant uses this collagen to produce edible animal casings for a variety of sausage products.

4. Objectives

The objective of this plan is to ensure an occurrence of significant environmental pollution incidents is communicated to all relevant groups and individuals, to prevent, minimise and control the risk of an environmental pollution incident, and also, appropriately establish and maintain the plan.

5. Responsibilities

Personnel carrying out work under this Procedure are familiar with and comply with it in full. The following persons have specific responsibilities as listed below:

Role	Responsibility
Managing Director (MD)	Attend the pollution incident site Follow PIRMP and Emergency Response Procedures
Safety Coordinator	Notify Managing Director Activate Emergency Response Procedure if required
Environmental Coordinator	Activate PIRMP Notify Safety Coordinator of the incident Inform required government agencies of the pollution incident Notify Community
Departmental Manager	Report immediately of any pollution incident to the Environmental Coordinator Complete a Hazard Near Miss Report form
All Personnel	Report any pollution incidents immediately to their supervisor and the Environmental Coordinator



6. Hazards and Risk Management

The site specific Environmental Aspects and Impacts Register is utilised to identify which areas and activities onsite have the greatest potential environmental impact.

Having identified these risks, a risk assessment is carried out on those impacts that have a 'high' consequence (greater than 10) and control measures assessed. Action Plans are put together for each high consequence risk which details pre-emptive actions already in place, as well as a proposed response should the pre-emptive controls fail.

Hazardous Substances

Devro's Vale Road facility is licenced to store hazardous substances. They are stored in designated storage depots and are appropriately signed.

Waste Water Treatment Plant

Devro's Vale Road Facility operates a Waste Water Treatment Plant. This facility operates in a bunded area. All factory waste water flows into the sump pit and is then transferred into the balance tanks. The waste is then passed through a primary screen before entering the carousel, where a biological treatment process takes place. This is then transferred to the intermittent aeration tank before discharging to sewer.

7. Pre-emptive actions in place

Devro has taken several measures to reduce the pollution incidents on site. The pre-emptive actions at Devro, taken to minimise the likelihood of hazards include the following:

- Environmental Trade Waste Officer
- Staff inductions
- Contractor inductions
- Standard Operating Procedures
- Hazard Identification tools – SWMS & JSA's
- Regular inspections, monitoring and auditing of site environmental controls
- Spill containment kits on site
- Emergency response team
- Training – Spill Response, etc

Devro will implement appropriate measures to limit, as far as reasonably practicable, the risk of pollution due to our activities. Such measures are set out in the management plans and Standard Operating Procedures including:

- Environmental Management Plan and annual EMS audit
- Waste Management Plan
- WHS Management Plan
- Incident Near Miss Procedure
- Emergency Procedure Manual
- Spill Procedure
- Hazardous Substances

Hazardous Substances

- Minimum stock of all goods
- Inspection of Hazardous Substances is part of a regular audit
- Spill Kits are in place and checked regularly
- Notification of Dangerous Goods on Premises - Workcover
- Hazardous Substances Procedure 011015
- Spill Procedure 155048
- Emergency Response Procedure 210036
- Environmental Incident Near Miss Procedure 151032



Waste Water Treatment Plant

Equipment Inspections:	physical daily operational inspections, repairs and maintenance regularly
Water Testing:	Regular analysis of samples sent to Australian Laboratory Services
Regular Servicing/Cleaning:	Tanks are serviced and cleaned as required
Bunded Work Area:	Concrete bunding and drains

Emergency Procedure Manual - 210036

The Emergency Procedure Manual documents the resources and strategies to address the immediate response to an incident. It provides guidelines for all workers to facilitate safe, orderly and timely response to an emergency situation.

8. Inventory Pollutants

An inventory of all chemicals utilised on site is maintained via ChemAlert. If any new chemicals have to be brought to site other than the one already approved in ChemAlert, a 'Material Approval Request' form 013204 must be completed and approved, chemical risk assessment of the new substance and SDS are to be submitted.

A summary of pollutants found at the Vale Road Facility is provided in the Table at Annexure A.

Devro has a comprehensive system for safe handling of such materials. The Vale Road facility uses this system that includes, but not limited to:

- Notification of Dangerous Goods on Premises – Workcover NSW
- Hazardous Substances Procedure
- Safety Data Sheets
- ChemAlert

9. Safety Equipment

Some of the safety equipment at the Vale Road facility includes:

- Spill kits are available on site.
- Breathing apparatus
- PPE – for handling chemicals
- Gas monitoring meters
- First Aid Kit

10. Contacts

Devro 24 Hour contacts

Service or Position	Name	Contact Number
Environmental Coordinator	Cameron Thomas	0428 692 500
Shift Supervisor		02 6330 8200



Relevant Authority Contacts

Relevant Authority	Telephone	Devro Communications Responsibility
Fire & Rescue NSW	000	Safety Coordinator, Environmental Coordinator, Shift Supervisor
NSW EPA	131 555	Environmental Coordinator
Public Health Unit - Bathurst Base Hospital	6330 5311	Safety Coordinator, Environmental Coordinator
The WorkCover Authority	13 10 50	Safety Coordinator
Bathurst Regional Council	6333 6111	Safety Coordinator, Environmental Coordinator

11. Communication

On site / Internal Communication

During emergency situations all internal communications are managed as detailed in the Devro Emergency Procedure Manual and Environmental Communication Procedure.

Community Engagement

Devro will notify immediately (i.e without delay) of any major pollution incidents which may have direct impact to the surrounding neighbours by one of the following methods:

- Door knocking by company representatives or emergency services personnel (dependant on nature of event);
- Letterbox drop; or
- Phone call by company representative

The appropriate method for communication will be determined by the nature of the event or as directed by the relevant agency.

Regular updates will be provided to the affected community throughout the course of the event.

A final notification will be made by letter when the incident is officially over to provide an update on the above.

Community notifications will be approved by the Managing Director or his/her delegate.

12. Minimising harm to persons on the premises

Refer Emergency Procedure Manual 210036. At all times minimising harm to persons shall be a priority.



13. Map

Devro's Vale Road Hazardous Substances storage area locations and site stormwater map is located in Annexure B.

14. Reportable Pollution Incidents

All pollution incidents or potential near misses shall be recorded and captured within Devro's Environmental Incident Near Miss records.

A *pollution incident* 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. 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.

Notification of a pollution incident is required if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

- a) harm to the environment is material if:
 - i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - ii. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by 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.

Licensees are required to report pollution incidents immediately to the EPA as is required under Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act), NSW Health, Fire and Rescue NSW, Workcover and local council.

Actions to be taken when notifying the pollution incident

The relevant information to be given when notifying the incident to the regulatory authorities is as follows:

- a) Time, date, nature, duration and location of incident;
- b) The estimated quantity or volume and the concentration of any pollutants involved, if known;
- c) The circumstances in which the incident occurred (including the cause of the incident if known);
- d) Action taken or proposed to be taken to deal with the incident;

Actions to be taken immediately after a pollution incident

Those directly dealing with the incident will:

- a) Liaise with the appropriate authorities
- b) Engage a contractor that will organise any clean up (if necessary)
- c) Inform any neighbours of the impact on their property

15. Staff Training

All managers, supervisors and staff will be trained. Tool box talks will be presented regularly to educate workers of preventative actions, controls, PIRMP updates, site issues and environmental pollution incidents involved on the site. The tool box meetings will present the chance for employees to raise any concerns or issues with the PIRMP.

Records of training completed for individuals will be maintained on personnel files, records of evacuation or response drills will be maintained by the Safety Coordinator. Any non-conformance or opportunities for improvement identified through such drills will be logged in the Non-Conformance Register.

All employees, subcontractors, suppliers and visitors to the site will undertake a site induction.

Through tool box talks, subcontractors will be educated on those aspects of environmental management as appropriate to the task assigned to them.

16. Testing and Review

The PIRMP and supporting plans and procedures are reviewed at least every 12 months. These reviews will ensure that the information included in the plans are accurate and up to date and that the plans will be capable of being implemented in a workable and effective manner.

Plans will be tested within one month using an audit observation form of any pollution incident occurring in the course of an activity, to assess, in light of that incident. The audit observation form records details of scope and criteria. The audit observation form includes the date on which the Plans have been audited, the name of the staff member who carried out the audit and the recommendations for improvement.

All testing of this management plan and any supplementary amendments that are made are to be documented, implemented and made available to EPA when requested.

Devro emergency team on a regular basis undertake emergency evacuation scenarios involving environmental pollution incidents.



Annexure A Summary of Pollutants at Vale Rd



Customer Service Centre – Operations
Ph: 13 10 50 Fax: 02 9287 5500

WorkCover NSW
82-100 Donnison Street, Gosford, NSW 2250
Locked Bag 2906, Lisarow, NSW 2252
T 02 4321 5000 F 02 4325 4145
WorkCover Assistance Service 13 10 50
DX 731 Sydney workcover.nsw.gov.au

13 February 2015

DEVRO PTY LIMITED
139 Sydney Rd
KELSO NSW 2795

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS CHEMICALS ON PREMISES

ISSUED UNDER AND SUBJECT TO THE PROVISIONS OF THE WORK HEALTH AND SAFETY
ACT 2011 AND REGULATION THEREUNDER

Acknowledgement Number NDG028370

Issued To DEVRO PTY LIMITED

Trading as

Premises where notified hazardous chemicals are stored/handled

46 Vale Rd, SOUTH BATHURST NSW 2795, AUSTRALIA

Emergency Contacts for this site:

1. CAMERON THOMAS Ph. 02 6330 8286

Site Staffing Site Hours: Site Hours: 12 HRS 5 DAYS 18 STAFF

This acknowledgement must be retained as PROOF OF NOTIFICATION
You must notify WorkCover of applicable changes, specified in the Work Health and Safety
Regulation 2011, to the Hazardous Chemicals used, handled or stored on these premises.

WORK HOME



WorkCover NSW
 92-100 Donnison Street, Gosford, NSW 2250
 Locked Bag 2906, Lisarow, NSW 2252
 T 02 4321 6000 F 02 4326 4145
 WorkCover Assistance Service 13 10 50
 DX 731 Sydney workcover.nsw.gov.au

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Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V1	Cylinder(s) In Use	1000			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1075	PETROLEUM GASES, LIQUEFIED	2.1	500L		
Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V2	Roofed Store	3200			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1719	CAUSTIC ALKALI LIQUID, N.O.S.	8	1600L	III	
1760	CORROSIVE LIQUID, N.O.S.	8	1600L	III	
Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V3	Roofed Store	20000			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1849	SODIUM SULFIDE, HYDRATED	8	10000Kg	II	
2949	SODIUM HYDROSULFIDE	8	10000Kg	II	
Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V4	Above Ground Tank	11000			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1830	SULFURIC ACID	8	11000L	II	
Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V5	Roofed Store	1000			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1830	SULFURIC ACID	8	1000L	II	
Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)			
V6	Above Ground Tank	4500			
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group	
1830	SULFURIC ACID	8	4500L	II	



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Storage ID	Storage Type	Maximum Storage Capacity (Kg/L)		
V8	Roofed Store	2000		
UN Number	Product Name	Class/Division	Typical Quantity	Packing Group
1760	CORROSIVE LIQUID, N.O.S.	8	2000L	II



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Annexure B

