

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Prepared for Elf Farm Supplies

Prepared by EPS

LOT 13 & 14 DP 1138749
108 MULGRAVE ROAD, MULGRAVE



CONTENTS

PIRMP Flow Chart	1
1. Introduction	2
2. Aims and Objectives.....	4
3. Relevant Legislation, Policy and Guidelines.....	6
4. Description and likelihood of Hazards.....	8
4.1. Definitions	8
4.2. Risk Identification, Assessment and Control	8
4.3. Hazard Matrix	9
4.4. Hazards	9
5. Pre-emptive Actions to be Taken	12
5.1. Corrective and Preventative Action Process	12
5.2. First Aid.....	15
5.3. Fire Safety	15
5.4. Emergency Evacuation Procedure.....	16
5.5. Chemical Spill Procedure	16
5.6. Gas Leak Procedure	16
5.7. Transport Pollution Incident Response	16
6. Inventory of Pollutants.....	18
7. Safety Equipment.....	19
7.1. Personal Protective Equipment.....	21
7.2. Fire Protection Equipment	21
8. Contact Details	23
8.1. Emergency Contact Details.....	23
8.2. Relevant Agency Details	24
9. Communicating with Neighbours and the Local Community	25
10. Minimising Harm to Persons on the Premises	27
11. Maps	28
12. Actions to be Taken During or Immediately After a Pollution Incident	29
12.1. Notification of Emergencies and Incidents	29
12.2. Record of Environmental Incidents	30

12.3.	Hazard Reporting Procedure	31
12.4.	Incident Investigation	31
12.5.	Hierarchy of Control Measures	31
12.6.	Review and Monitor	32
12.7.	Clean-up	32
12.8.	Costs	32
13.	Staff Training	33
13.1.	Incident Management Training	33
14.	Pollution Incident Response Management Plan Testing and Review	34

TABLE OF FIGURES

Figure 7-1: Spill Control Station and Signage - Elf Farm Site	19
Figure 7-2: Directive Drainage - Elf Farm Site.....	20

LIST OF TABLES

Table 4-1: Hazard Risk Matrix.....	9
Table 4-2: Risk Rating Groups.....	9
Table 4-3: Hazard Identification	10
Table 5-1: Risk Identification and Preventative Measures.....	13
Table 6-1: Inventory of Pollutants	18
Table 7-1: List of Safety Equipment.....	20
Table 7-2: Personal Protective Equipment Specifications: Face Respirator.....	21
Table 8-1: Emergency Contact Details.....	23
Table 8-2: Agency Contact Details.....	24

APPENDICES

APPENDIX 1 Hazardous Chemicals Manifest

APPENDIX 2 Raw Materials Specification

APPENDIX 3 Emergency Procedure

APPENDIX 4 Chemical Spill Procedure

APPENDIX 5 Gas Leak Procedure



APPENDIX 6 Transport Pollution Incident Procedure

APPENDIX 7 Pollutant Location Map

APPENDIX 8 Substrate Plant Location Map

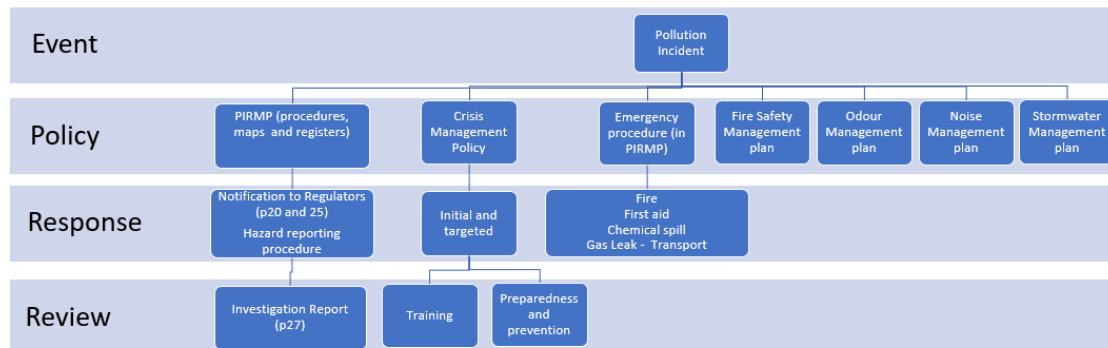
APPENDIX 9 Pollution Incident Response Plan Test Register

APPENDIX 10 WHS Risk Management Procedure

APPENDIX 11 Hazard Reporting Procedure

APPENDIX 12 Safety and Fire Equipment Location Map

PIRMP FLOW CHART





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 plant 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 (EPL) L6229 issued by the Environment Protection Authority (EPA) in accordance with 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* 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 2022, the EPA made several additional changes to the framework that governs PRIMPs. Specifically:

- A 1 September 2022 update to the 'Guideline: Pollution Incident Response Management Plan';
- A 1 September 2022 update to the *Protection of the Environment Operations Act 1997* (POEO Act);
- A new *Protection of the Environment Operations (General) Regulation 2022* was introduced; and
- A September 2022 update has been made to the EPA's PIRMP template.

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 and revised annually. This plan aims 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 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 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.



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 EPA issues EPL's to the owners and operators of various industrial premises under the POEO Act. An EPL contains a set of conditions relating to pollution prevention and monitoring, 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 72 of the Protection of the Environment Operations (General) Regulation 2022 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 coordinating, 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 72 of the POEO(General) Regulation states:

For the Act, section 153C(d), the following matters must be included in a PIRM plan—

- (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 the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,*
 - (c) details of the pre-emptive action to be taken to minimise or prevent a 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 a pollutant 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 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 individuals who—*
 - (i) are responsible for activating the PIRM plan, and*
 - (ii) are authorised to notify relevant authorities under the Act, section 148, and*
 - (iii) are responsible for managing the response to a pollution incident,*
 - (h) the contact details of each relevant authority referred to in the Act, section 148,*
 - (i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near 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 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 likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of stormwater drains on the premises,*
 - (l) a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,*
 - (m) the nature and objectives of a staff training program in relation to the PIRM plan,*
 - (n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,*
 - (o) the dates on which the PIRM plan is updated,*
 - (p) the way in which the PIRM plan must 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 Environment Protection Authority in March 2012. It has reviewed the PIRMP in accordance with the updated Pollution Incident Response Management Plans Guideline issued by the Environment Protection Authority in March 2020 , and updated again in September 2022.



4. DESCRIPTION AND LIKELIHOOD OF HAZARDS

In accordance with Clause 72 (a) and (b) of the *Protection of the Environment Operations (General) Regulation 2022*, 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

High – 1 or 2	Medium – 3 or 4	Low – 5 or 6
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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;
- Workplace inspections and audits results;
- Previous PIRMP testings;
- Employee knowledge and experience;
- Number of employees potentially affected;
- 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 and rating	Likelihood of Hazard Occurring	Consequence	Activities which may increase the potential of the hazard occurring
Chemical Spill (medium risk)	Unlikely	Moderate	Vehicle Collision, Plant failure, Human error, Transfer of substance
Contaminated Stormwater (medium risk)	Unlikely	Moderate	Excessive rainfall, Vandalism, Overflow of Stormwater Retention System/Dam
Fire (medium risk)	Unlikely	Major	Plant Failure, Smoking, Combustion, Bushfire
Dust (medium risk)	Likely	Minor	Dry weather, High traffic, Wind



Hazard and rating	Likelihood of Hazard Occurring	Consequence	Activities which may increase the potential of the hazard occurring
Noise (low risk)	Unlikely	Minor	Plant failure, High traffic
Diesel / Fuel Spill (low risk)	Unlikely	Minor	Infrastructure works, Plant Failure, Breaking caps, Excavation, Ground penetration, Human error
Diesel / Fuel Fire (medium risk)	Unlikely	Major	Plant Failure, Smoking, Combustion, Bushfire, Diesel/Fuel Spill
Odour (low risk)	Unlikely	Minor	Plant failure, Dry/Wet weather, Wind
Raw Material Spill (medium risk)	Likely	Minor	Handling error, Equipment failure
Raw Material Fire (medium risk)	Unlikely	Moderate	Equipment Failure, Combustion, Bushfire, Smoking, Raw Material Spill, Straw Bales

A comprehensive list of the chemicals and other dangerous goods kept on site is located in the Hazardous Chemicals Manifest. A copy of this manifest is attached at Appendix 1.

A comprehensive list of all raw materials used on site, including detailed specifications of each material type, is also 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:

- 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, sulphuric acid storage area 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.


Potentially significant environmental impacts can be reduced and/or the potential impacts mitigated by implementing appropriate preventative measures. The 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
Chemical Spill	Site contamination – onsite and off site Fire	<ul style="list-style-type: none"> • All areas containing hazardous chemicals bunded to ensure containment of potential spills • Labelled spill kits readily available within bunded areas • Repairs and maintenance • Secure access to chemicals
Contaminated Storm water	Onsite and offsite contamination Impact on surrounding flood plain land	<ul style="list-style-type: none"> • Continual monitoring of water storage levels on site • Stormwater Retention Basins • Water recycling pits located on site • Bunding • Automated plant (pump stations) • Physical barriers • Out of hours contact and staff supervision
Fire	Air pollution Infrastructure damage Plant damage Human health issues	<ul style="list-style-type: none"> • Fire hoses installed in all work areas • Smoking and naked flames restricted to designated smoking areas • Staff trained in fire procedures • Extinguishers kept on all mobile plant and in each work area • Diesel fuel stored underground and in above ground tank segregated from other storage and processing areas • Fuel dispensing area sealed and bunded with appropriate fire and hazard warning signs • Secure flammable chemicals • Plant maintenance • Management of vegetation: grazing of surrounding paddocks to reduce fuel loads • Ground management for fire safety • Implementation of Fire Safety Manual and Evacuation Plans
Dust	Air Pollution Impact on nearby neighbours	<ul style="list-style-type: none"> • Roads and surfaces kept sealed • Dry ingredients used on site protected from direct wind • Non-operational areas stabilised by hardstand areas, grassed or landscaped • Buildings and vegetation providing wind breaks to limit the effects of winds at a ground level within the plant • Traffic management



Risk	Impact	Preventative Action
Noise	Negligible Impact on nearby neighbours	<ul style="list-style-type: none"> Road repairs
		<ul style="list-style-type: none"> Noise levels kept to within appropriate standards for day and night time works for surrounding properties Best quality plant: All stationary noise making plant and equipment such as fans, pumps and conveyors are enclosed within buildings or structures Ventilation plant room, and all buildings walls are designed and constructed with thick concrete-filled block extending to the height of the roof-line Insulated roofing Truck filling area surrounded by buildings to reduce travel of noise Plant design and equipment purchases guided by acoustic considerations and professional input Traffic management (best practice): Truck drivers encouraged not to use exhaust brakes at night Best management practices adopted as endorsed by OEH Road repairs Doors to operation areas kept closed when not in direct use Equipment maintained and repaired where necessary to meet original specifications for noise attenuation
Diesel/Fuel Spill	Human health impacts Onsite and Offsite environmental damage and contamination Fire	<ul style="list-style-type: none"> All fuel stored in isolated, banded, double skinned tanks Refuelling taking place on porous concrete surfaces to assist in absorbing any contaminants in a spill Spill decks and spill kits located next to all diesel tanks and refuelling areas In the case of escaping spill contaminants, overflow channelled into a site wide drainage system feeding back to appropriate liquid recycling pits 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
Diesel/Fuel Fire	Plant damage/failure Human health impacts Offsite environmental damage and contamination	<ul style="list-style-type: none"> Prohibition of smoking and naked flames to reduce risk Dry chemical extinguishers located at all refuelling stations and diesel tanks Appropriate staff trained in fire safety management Staff handling fuel provided with appropriate Personal Protective Equipment All mitigation and prevention measures listed above
Odour	Air pollution	<ul style="list-style-type: none"> All aspects of operations managed to keep odour emissions as low as possible and always within the limit specified in the environmental protection licence



Risk	Impact	Preventative Action
		<ul style="list-style-type: none"> • Odorous compounds removed from exhaust air prior to release to atmosphere • Spillages cleaned up any daily
Raw Material Spill	Impact on nearby neighbours	<ul style="list-style-type: none"> • Hazardous raw material stored isolated from other materials (noting not all raw material is considered hazardous) • Product ordered on a routine 'just-in-time' basis to reduce amount of stock held on site at any one time
Raw Material Fire	On site environmental damage	<ul style="list-style-type: none"> • Materials kept in cool areas • Materials kept in well ventilated areas • Prohibition of smoking and naked flames to reduce risk • Appropriate staff trained in fire safety management • Fire hoses installed in all work areas • Extinguishers kept on all mobile plant and in each work area • Secure flammable chemicals • Implementation of Fire Safety Manual and Evacuation Plans

5.2. FIRST AID

In the event of a pollution incident impacting on the health of a person, the emergency first aid procedures must be followed. It is located at Appendix 3 "Emergency Procedure".

An emergency first aid data sheet is available in the emergency procedures.


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;
- Sign posting 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.

Fire Safety Procedures are included at Appendix 3 “Emergency procedure”.

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.

A copy of the Emergency Procedure, including the post emergency procedure, is attached at Appendix 3.

5.5. CHEMICAL SPILL PROCEDURE

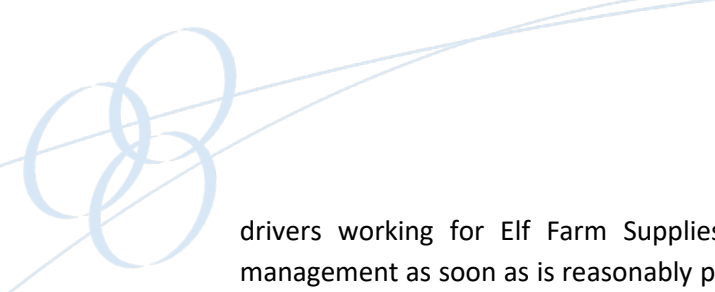
Elf Farm Supplies has in place a Chemical Spill Procedure to ensure all staff members are guided to effectively manage chemical spills on site. Most importantly, it is necessary to notify management of a spill as soon as it is reasonably practicable to do so. A copy of the Chemical Spill Procedure is attached at Appendix 4.

5.6. GAS LEAK PROCEDURE

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

5.7. 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 Hazardous Chemicals Manifest and a Raw Materials Specifications, which lists all hazardous material and potential pollutants stored on site. This manifest and specifications are periodically updated and provide a consistent and streamlined register of pollutants on site.

For the sake of consistency, the manifest has been attached at Appendix 1 and the raw materials specifications in Appendix 2 and should be regarded as the full inventory of pollutants. Table 6 1 below provides a summary of those registers for completeness.

Table 6-1: Inventory of Pollutants

Item	Quantity
Diesel Fuel Above Ground	Less than 52,000 litres
Diesel Fuel Below Ground	Less than 20,000 litres
Acids	Less than 20,000 litres
Chemicals used for cleaning and production	IBC less than 1,000 litres, less than 5 IBC
Stormwater Retention Basins	More than 10,000 litres
Raw Materials	
Gypsum	Less than 100 tonnes
Cotton Seed	Less than 150 tonnes
Straw Bales	Less than 1,500 tonnes
Stable Bedding	Less than 70 tonnes
Urea	Less than 20 tonnes
Feather Meal	Less than 25 tonnes
Chook Manure	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;
- **Fire fighting** water truck;
- **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. In addition, Elf Farm Supplies has a number of portable fire extinguishers, fire hydrants and fire hose reels located throughout the site. A map of all this equipment is attached at Appendix 12 (Safety and Fire Equipment Location Map).

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

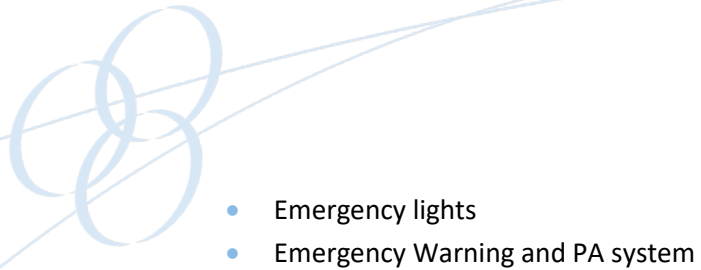
Management must ensure that:

- 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:

- Break glass
- Electrical switch rooms
- Emergency exits

- 
- Emergency lights
 - Emergency Warning and PA system
 - Extinguishers
 - Fire blankets
 - Fire control room (FCR)
 - Fire Hose reels
 - Fire Hydrants
 - Fire indicator panel (FIP)
 - First aid
 - Gas - main shutoff valve
 - Smoke detection
 - Spill Kits

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
NSW Police Force	Windsor 13 Mileham Street, Windsor 2756 Phone: 02 4587 4099 Fax: 02 4587 4011 Open 24 hours
Ambulance Service	Emergency Contact: 000 Mobile Phone: 112 Available 24 hours
Fire and Rescue NSW	Windsor 1 Anderson Place, South Windsor NSW 2756 Phone: 02 4588 4581
NSW Rural Fire Service (Bushfire)	1800 679 737 02 4577 3182
NSW SES	13 25 00
Poison Centre	13 11 26

All emergency personnel must be provided the following information (verbally and in writing):

- 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 actions 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.



The following Managers are available 24 hours a day to assist and manage environmental, production or personal emergencies:

General Manager
Phase 1 Manager
Phase 2/3 Manager
Maintenance Manager

8.2. RELEVANT AGENCY DETAILS

Table 8-2: Agency Contact Details

Agency	In case of	Contact Details
Hazmat	Hazardous material incident	Hazmat Advice Unit Phone: 02 9995 59599493 1863 Email: Hazmat@environment.nsw.gov.au
Environmental Protection Authority	All pollution incidents	EPA Head Office PO Box A2905022 Sydney South, NSW 1232.Paramatta NSW 2124 Phone: 131 555
Nepean Blue Mountains Local Health District	Pollution incident causing personal harm	Phone: 02 4734 20222000 After 5pm Phone: 02 4734 2000 Westmead Nepean Hospital, ask for Public Health Officer on call
SafeWork NSW	Pollution or notifiable incident causing personal harm	Phone: 13 10 50
Hawkesbury City Council	Pollution incident with offsite environmental impacts	Phone: 02 4560 4444 366 George Street, Windsor NSW 2756

All relevant authorities must be informed of the following information (verbally and in writing):

- 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 actions 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.

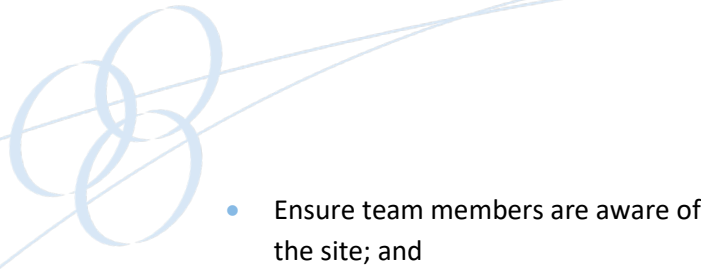
In case of an environmental incident the following consultation and communication methods will be used:

- Company representatives will personally notify members of the premises about the situation;
- Information statements regarding any safety measures will be prepared and issued in person to neighbouring properties;
- Neighbouring properties and residents can utilise the 24 hour complaints line for instances where site operations cause concern; and
- This line is: **1800 155 079**

A redacted version of this PIRMP will also be posted on the Elf Farm website.

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 by 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.



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.

The risk management process is used:

- To assess the current workplace and systems of work;
- Before 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.

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 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 labelled 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. MAPS

The following maps are included as attachments to this management plan:

- Pollutant Location Map – Appendix 7;
- Substrate Plant Location Map – Appendix 8;
- Safety and Fire Equipment Location Map – Appendix 12.



12. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION 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 pollution 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.

12.1. 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 it involves actual or potential harm to the health or safety of human beings or ecosystems is not trivial; and
- If it results in actual or potential loss or property damage (including clean-up costs) of an amount, or amounts in aggregate, exceeding \$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. **Nepean Blue Mountains Local Health District**
Contact Number: 02 4734 2000
Contact Number (After 5:00pm emergency number): 02 4734 2000
(Nepean 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.

12.2. 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.



12.3. 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 WHS Risk Management Procedure, and Hazard Reporting Procedure. A copy of these procedures is attached at Appendix 10 and Appendix 11 respectively.

12.4. INCIDENT INVESTIGATION

Elf Farm Supplies' employees 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 assesses 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.

12.5. 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 e.g. guarding of machines;
 4. Isolation – separate the person from the plant e.g. 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, e.g. 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.

12.6. 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.

12.7. 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.

12.8. 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.



13. STAFF TRAINING

All staff employed at the Mulgrave substrate plant are trained in their responsibilities. Any new personnel are given training by their 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.

Monthly 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.

13.1. 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 how to report a pollution incident, identify the severity of the incident and take action in relation to rectifying the pollution incident.



14. 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 1st of June each year. This version of the PIRMP is to be formally reviewed and updated prior to the 1st of June 2024.

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 are 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 1 Hazardous Chemicals Manifest

APPENDIX 2 Raw Materials Specification

APPENDIX 3 Emergency Procedure

APPENDIX 4 Chemical Spill Procedure

You must know and understand what to do if a spill occurs

Your first consideration is the immediate safety of all people present

If situation is uncontrollable, call emergency services.

Then contain the spill but only if it is safe to do so

If help is available, allocate responsibilities to others to create a competent emergency team to deal with the spill

Spill checklist

1. Raise the alarm
2. Evacuate people if necessary
3. Call emergency services (dial 000)
4. Close valve, plug leak or upright container, if safe to do so
5. Utilise safety equipment to contain the spill
6. Call on specialist advice
7. Clean up spill
8. Recover product or dispose of waste safely

Precautions

- Do not endanger yourself
- Wear personal protective equipment (PPE) appropriate for the spilled substance
- Do not leave the area unattended if there is a risk of a further spill
- If spill is likely to enter a waterway notify the local council
- Advise manager of the incident

Hazardous substance spills

- Raise the alarm by: Call point on fire panel, air horn (above fire panel), 2-way radio for loaders, mobile phone
- Evacuate if necessary
- Identify the nature of the spilled substance
- Put on safety equipment (e.g. overalls, boots, gloves, eye protection, etc.)
- If it is safe to do so, close off the source of the spill
- Remove sources of ignition if flammable substance present
- Identify the danger posed by the spill – only respond if it is safe to do so
- Refer to the safety data sheet or call on an approved handler or other specialists for advice
- Safety data sheets are available at office
- If necessary, call emergency services and advise EPA, Department of Planning, SafeWorkNSW and local Council
- Use your spill kit (contain the spill if it is safe to do so – utilise a drip tray or oversize container or absorbent to soak up a small spill)
- Large spills contained in bunded areas will probably require vacuum vessels/trucks to remove and dispose.
- Dispose of waste safely as set out in the safety data sheet

After the event

- Replenish your spill kit
- Complete an incident report
- Review the effectiveness of the emergency plan
- Undertake PIRMP testing within one month of incident

APPENDIX 5 Gas Leak Procedure

You must know and understand what to do if a leak occurs

Your first consideration is the immediate safety of all people present

Next call emergency services

Contain the leak but only if it is safe to do so

If help is available, allocate responsibilities to others to create a competent emergency team to deal with the leak

Gas leak checklist bulk facility

1. Raise the alarm
2. Evacuate people from the area
3. Activate any emergency shut down of systems
4. Activate any water spray protection systems
5. Call emergency services (dial 000)
6. Call your manager

Precautions

- Do not endanger yourself
- Make sure you have an escape route
- Keep hands and face clear of any escaping gas or liquid
- No smoking. Keep ignition sources at least 20 metres away until the area is safe
- Do not use equipment again until it has been inspected
- Do not leave the site unattended if there is a risk of a further leak
- Advise your manager of the incident

Leak suspected with cylinder or appliance

- If there is any possibility of cylinder(s) being engulfed by fire, evacuate adjacent areas
- Call the Fire Service, advise the location of the cylinder or appliance, that it is LPG and the cylinder size
- Keep cylinder cool with a water hose, sprayed from maximum possible distance
- Remove or extinguish sources of ignition
- Remove from heat source if it is possible and safe to do so
- Stop the leak by shutting the cylinder valve if it is safe to do so
- Do not interfere with any part of a fixed installation
- If gas is leaking ventilate the area thoroughly until the air is clear
- If the leak persists, remove the cylinder to a safe outdoor area if it is safe to do so
- If it is a minor leak, check the system for any indication of gas, such as a smell or hiss
- Test with soapy water solution, which will bubble at any point where gas escapes
- If a leak is found at a connection, re-make the connection and test again
- Do not use the cylinder or appliance again until inspected

Bulk storage system leak

- Activate alarm, evacuate the area
- Call the Fire Service
- Remove all sources of ignition
- Activate any fire protection systems
- If a pipeline leak, close isolation valves, if it is safe to do so

After the event

- Complete an incident report
- Review the effectiveness of the emergency plan

APPENDIX 6 Transport Pollution Incident Procedure

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.

APPENDIX 7 Pollutant Location Map

APPENDIX 8 Substrate Plant Location Map

APPENDIX 9 Pollution Incident Response Plan Test Register

APPENDIX 10 WHS Risk Management Procedure

APPENDIX 11 Hazard Reporting Procedure

APPENDIX 12 Safety and Fire Equipment Location Map