Appendix B: PIRMP Snackbrands Blacktown - Premises **DOCUMENT REVISIONS (PIRMP Update details)**

REVISIONS										
Revision #	Reason for & Details of Updates (nature of changes to PIRMP)	Date	Author	Date Updated version Web Site						
Old format	Original PIRMP Issue	15/10/2018	Richard Stock	Feb 2020						
New V2	Draft - Blacktown PIRMP (old format) updated to new guideline issued by NSW EPA _April 2020	Jan 2021	Kate Robinson							
V3	Reviewed Version- Update to include changes in contacts, responsibilities. Site maps, DG list have been updated. Risk assessment descriptions updated.	July 2021	Head of Environment	August 2021						

APPROVALS

Title	Signature	Date
Head of Quality & Environmental Affairs		
HO of Workplace Health & Safety		
Blacktown Quality & Environmental Manager		
Blacktown Site Manager		
Director of Operations & Supply Chain		

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN LICENCE NUMBER: EPL 21243

Position/Title: Head of Quality and Environment Date: 30/08/21

PURPOSE:

SNACK BRANDS INDUSTRIES PTY LIMITED ACN 054 045 662 and SNACK BRANDS FOODS PTY LIMITED ACN 079 719 716 trading as SNACK BRANDS AUSTRALIA ABN 38 424 554 643 holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Blacktown Manufacturing Site 30-32 Bessemer St, Blacktown, NSW 2148. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, and/or by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's Guideline: Pollution incident response management plans.

Duty to notify pollution incidents

There is a duty to notify 'relevant authorities' as specified in section 148(8) of the POEO Act (the EPA, local authority, Ministry of Health, SafeWork NSW (formerly WorkCover) and Fire and Rescue NSW) of pollution incidents where material harm to the environment is caused or threatened.

Definitions:

<u>Pollution Incident:</u> An incident or set of circumstances during or as a consequence of which there is or is likely to be 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 a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

<u>Material Harm</u>: includes actual or potential harm to the health or safety of human beings or to ecosystems <u>that is not trivial</u> or that <u>results in actual or potential loss or property damage of an amount over \$10,000.</u>

Loss: the reasonable cost and expenses that would be incurred in taking all reasonable practicable measures to prevent, mitigate or make good harm to the environment

Relationship with other Emergency Plans: to be read in conjunction with:

WHS_PR_07_004B Emergency Procedures Manual _Blacktown WHS_PR_07_001 - SBA Emergency Management and Preparedness

SNACK BRANDS INDUSTRIES PTY LIMITED ACN 054 045 662 and SNACK BRANDS FOODS PTY LIMITED ACN 079 719 716 trading as SNACK BRANDS AUSTRALIA ABN 38 424 554 643
21243
Snackbrands Blacktown Manufacturing Site Site 30-32 Bessemer St, Blacktown, NSW 2148
Lot 1 DP 205360 Latitude: 33°45'16"S Longitude: 150°54'28"E
Environmental Complaints Line
Please call 1800 317 324
Position or title: Head of Quality & Environmental Affairs
Name: Kate Robinson
After hours contact number/s: 0408 529 138
Email: kate.robinson@snackbrands.com.au
Position or title: Blacktown Site Operations Manager
Name: Luke Phelps
After hours contact number/s: 0417 270 986
Email: luke.phelps@snackbrands.com.au
https://www.snackbrands.com.au/contactus
https://www.snackbrands.com.au

Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified. When a pollution incident occurs on site

- 1. Phase 1: Immediately engage in harm minimisation measures / spill containment as per procedures documented in the site Emergency Response Plan (ERP) or Pollution Incident Response Management Plan (PIRMP).
- 2. If the incident presents an immediate threat to human health or property contact emergency services on 000 immediately
- 3. Phase 2: Assess the level of actual or potential pollution and decide whether the incident is a 'notifiable' incident.
- **4.** Phase 3: If the incident is considered '**notifiable**' the following agencies must be notified immediately
- 5. If the incident impacts the community undertake telephone contact as outlined

Phase 3: Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment. *Relevant authorities include:*

Emergency Services		000
Fire and Rescue NSW - Blacktown Fire Station		(02) 9622-8932
EPA – General Contact	EPA Enviro Line 131 555 info@epa.nsw.gov.au	131-555 (02) 9995 5555
NSW Health- Parramatta Public Health Unit (Western Sydney LHD)	Phone: (02) 9840 3603	9840-3603
NSW Health- General Contact - Blacktown Hospital	Emergency Phone: (02) 98818215	(02) 9881 8000
See www.health.nsw.gov.au/Infectious/Pages/phus.aspx for local contact details.	- ask for Public Health Officer on call	
SafeWork NSW		131-050
Local authority/s		

	council@blacktown.nsw.gov.au	(02) 9839 6000
Blacktown City Council		
Any other identified organisation or agency requiring notification (if applicable)		
Sydney Water NSW- Troy Carruthers TROY.CARRUTHERS@sydneywater.com.au Sydney Water NSW- General Contact		0409 987 292 132-090
Spill mitigation		
Large volume spill – Veolia	After Hours Larry Sutton	0438 651 306
	Anter Houre Larry Carter	132 955
Approved Hazardous Contained Waste Removal – Veolia	Praneesh.Chand@Veolia.com	
		132 955

Phase 4 Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

No on map	Neighbour	Name	Address	Telephone Number
1	Nearby Property (North)	Fineseat	36 Bessemer St Blacktown	(02) 9771 6600
2		Caddy Storage	4/8 Gate Rd Blacktown	(02) 9831 2878
3	Nearby Property (East)	Scaffold King	1/6 Forge St Blacktown	0412558848
4		Briall Fabrications	2/6 Forge St Blacktown	0437499152
5		Parsram Foods and Spices	4/6 Forge St Blacktown	0434426548
6		Roof right Metal Roofing	1/8 Forge St Blacktown	1300729119
7		Amber Electrical	8 Forge St Blacktown	1800888171
8		Regal Steel Metal	5/8 Forge St Blacktown	(02) 9621 8556
9		Nayon	7/8 Forge St Blacktown	0406824475
10		Active Automotive Transmissions	3/10 Forge St Blacktown	(02)96224466
11		Martin Stainless	6/10 Forge St Blacktown	(02) 9621 7740
12.		Destiny Kitchens	7/10 Forge St Blacktown	0419 999 987
13		John R Truck	10 Forge St Blacktown	(02) 96715722
14		Cali's Kitchen	12 Forge St Blacktown	0404771919
15		Spirax Sarco	14 Forge Street Balcktown	(02)98523100

16	Nearby Property (South)	Brickwoods	30- 32 Bessemer St Blacktown	(02) 9671 1898
17	Nearby Property (West)	Snap Printing	1/3 Carnegie PI Blacktown	(02) 9621 6055
18		Big J's Automotive	3/1-3 Carnegie Pl Blacktown	0426829460
19		Believers of God Church	4/1-3 Carnegie Pl Blacktown	0432152090
20		Freemasons NSW + ACT	1/3 Carnegie Pl Blacktown	(02) 9284 2800
21		The Sandwich Shop	21 Bessemer St Blacktown	(02) 9831 4025
22		Specialised Architecture Engineering	2/23 Bessemer St Blacktown	(02) 96768804
23		B + E Foods	25 Bessemer St Blacktown	(02) 9757 3389
	Nearby Property (Down Stream)	Kevin Waters + Sons	28 Bessemer St Blacktown	(02) 9671 5719

Key High-Risk Community Stakeholders

Stakeholder Component	Name	Address	Telephone Number
School	Blacktown North Public School (900m)	1 Bessemer Street, Blacktown NSW 2148	(02) 96222968
School	Blacktown Boys' High School (1.9km)	Fifth Ave, Blacktown NSW 2148	(02) 96221558
School	Blacktown Girls' High School (2.5km)	87 Turner St, Blacktown NSW 2148	(02) 98317577

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):

By phone call

Communicating with neighbours and the local community

Communicating with Neighbours – Actions to be taken:

- 1. Site Manager upon becoming aware of a notifiable pollution incident assesses the severity of the incident with regard to impact on neighbouring properties
 - a. Consider the following

- i. Does the pollution incident have the potential to affect one or more neighbouring properties?
- ii. How will it affect them (including long- and short-term effects)?
- iii. What actions need to be taken by the neighbouring properties to protect them from harm?
- b. Site Manager contacts the Head of Quality and Environment within one hour of the incident occurring and informs of the incident & possible impact on neighbouring properties
- 2. Site Manager or designate contacts the neighbouring properties deemed necessary and provides them with the following information relevant to the pollution incident:
 - a. What has happened?
 - b. Any Health and Safety implications for them
 - c. Corrective Actions which have been activated to minimise the harm/prevent further harm
 - d. What to expect?
 - e. Further contact based on future updates
 - f. Site Manager contact details for further queries/concerns
- The Head of Quality and Environment liaises with the Director Supply Chain / ELT and provides the Site Manager on other communication strategies to be employed to inform nearby properties and the wider community of important information related to any incident as a result of the environmental incident

Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

The Site Activities in the manufacture of snack-foods has the following associated hazards:

- Emissions to Air
- Storm Water and Liquid Spills
- Dry Waste: Product, Agricultural Processing Offal and General Waste
- Impact on Flora & Fauna

	Risk			****		Revised Risk		
Key Environmental Hazard	L	С	R	Mitigation measures	L	С	R	
Emissions to air								
Excessive dust emissions	Unlikely	Minor	VLow (5)	Mechanical sweeping of yards Stop dust generating activities as necessary	Unlikely	Minor	V Low (5)	
2 Noise	Likely	Insignificant	Low (7)	Noise Emissions tested ; All equipment serviced and maintained in standard	Possible	Insignificant	VLow (4)	
Health Issues off site	Rare	Minor	V Low (3)	All liquid waste treated and discharged to sewer. All solid waste segregated. Putrescible solid waste treated off site by Licensed Contractor.	Rare	Moderate	V Low (6)	
4 Odour	Possible	Minor	Low (8)	Food Waste Skip closely managed to ensure they are covered and emptied as scheduled Stack emissions highly diluted with ambient air Odour ex Waste Treatment plant	Unlikely	Minor	VLow (5)	
Equipment exhaust emissions exceed limits (Odour /VOC/ /Particle Size	Possible	Minor	Low (8)	Emissions from fryer stacks tested and within standard All equipment is serviced and maintained FFA levels measured & controlled in Frying oil Excessive equipment emissions to trigger out of service procedures	Unlikely	Minor	V Low	
Storm water / Liquid spills	•							
1 Groundwater contamination	Unlikely	Moderate	(6)	Implement Monitoring and response Plane Ensure storage, handling and transport of dangerous goods are conducted in accordance with Australia, Standards and WHS Legislation Identify, classify, quantify & appropriately store hazardous waste Develop & implement oil & fuel spillage controls Ensure hazardous waste is minimised Licenced contractors to remove hazardous waste from site Keep records of all hazardous waste movements Implement bunding to appropriate areas as required	Rare	Moderate	V Low (6)	

Minimise hazardous waste storage quantities on site

2	Discharge of sediment	Possible	Moderate	Low (13)	Develop & implement Storm Water Management Plan Install and maintain Drains & shutoff valves Review routine inspections result quarterly & action as necessary Develop & implement surface & groundwater response plan	Unlikely	Moderate	(6)
3	Discharge of hazardous materials or process liquids	Possible	Major	Medium (18)	Where emergency storm water isolation valve installed test for effectiveness Ensure storage, handling and transport of dangerous goods are conducted in accordance with relevant Australian Standards Identify classify, quantify & appropriately store hazardous waste Develop & implement oil & fuel spillage controls Implement bunding to appropriate areas and routinely test for integrity Ensure adequate spill kits are available on site including adequate training for effective use Minimise hazardous waste storage quantities on site & Ensure use Bunding Appropriate location of hazardous materials storage areas to prevent off-site discharge	Unlikely	Major	Low (14)
4	Spill of liquid whilst in storage ingredients, chemical or wastewater	Possible	Moderate	Low (13)	Liquid stored according to Australia Standards bunding requirements. Measures in places to ensure spills do not leave site boundaries ie diverting flow away from boundaries, stormwater drains. Adequate spill kits, drain seals, stormwater isolation valves. Bunding, spill kits, drain seals and isolation valves submitted to regular inspection and maintenance	Unlikely	Moderate	Low (9)
4	Spill during delivery of fuels or liquid ingredients to storage tank	Possible	Moderate	Low (13)	Suppliers transfer procedure is known and approved Operators supporting unloading trained to SOP Transfer is supervised against SBA/ Suppliers procedures	Unlikely	Moderate	(6)
5	Improper storage and handling of liquid wastewater	Likely	Moderate	Medium (17)	Ensure water leachate is contained on site; Control Quantities and treatment outcomes to the specified Sydney Water Consent Agreement Location of storage close to processing point Waste materials are managed in accordance with approval conditions Excess waste materials are disposed of in accordance with legislative requirements Ensure WWTP equipment is serviced & maintained so will conform to the required operating specifications. Ensure suitable coverage and training by and of Waste Treatment Plant Operators	Unlikely	Moderate	(6)

6	Land contamination	Possible	Moderate	Low (13)	Ensure high risk areas of site are sealed and in good condition No storage of liquids or equipment on unsealed surfaces. All Hazardous materials to be stored in bunds or Dangerous storage cabinets	Unlikely	Moderate	(6)
Dry	y Waste: Product, Agricultural	Process	sing Offa	I and Gene	eral Waste			
1	Improper storage of Dry waste	Almost certain	Minor	Low (10)	Ensure Signage to identify Waste type Ensure Waste Bins where practical covered or enclosed to stop Native Birds- Ibis & Animals -possums; Rodents Clean up Spillages around bins- implications for Stormwater	Likely	Minor	Low (7)
		Possible	Major	Medium (18)	Registers & contracts setup to ensure Disposal by Registered / Licensed Contractors	Unlikely	Major	Low (14)
					Impact on Native flora and Fauna			
1	Damage to site fauna	Likely	Minor	Low (12)	Ensure measures devised to prevent native fauna occupying site – especially birds. Cover food waste skips and clean up solid spills Trap and relocate as required (e.g. Possums) Ensure all doors to Factory Facilities are closed	Unlikely	Minor	VLow (5)
2	Restrict weeds growing on site	Possible	Insignificant	V Low (4)	Ensure all declared or restricted weeds are removed from site as part of ground maintenance	Unlikely	Insignificant	V Low (2)

Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

- Training for the Handling of Dangerous Chemicals
- The development & documentation and the yearly refresher of PIRMP training, around a simulated spill.

- Bunding of storage tanks and IBCs
- Development, use and maintenance of Standard Operating Procedures
- Environmental Documentation stored and available for reference & revision on the Quality Management System Intranet system
- The use of Alarms (Audible and/or Red Flags on control screens)
- OH&SE audits
- Risk matrix identification and mitigation
- Check-sheets to enforce critical actions

Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Identify the maximum quantity of any pollutant/s likely to be stored or held at locations (including underground tanks) at or on the premises to which the licence relates.

Dangerous Goods Descriptions and Hazards							
Class	Description	Hazards					
2	Non-Flammable, Non Toxic Gases	Gases are capable of posing serious hazards due to their flammability, potential as asphyxiates, ability to oxidize and/or					
2.1	Flammable Gases	their toxicity or corrosiveness to humans					
8	Corrosives	Corrosives cause severe damage when in contact with living tissue or, in the case of leakage, damage or destroy surrounding materials					

Chemical Storage

Person Conducting the Business or Undertaking (PCBU): The Real McCoy Snackfood Co Pty Ltd Address of Premises: 30 – 32 Bessemer Street, Blacktown, NSW, 2148 Date of Preparation: 29th October 2021

Emergency Contacts

Name	Position	Telephone
A Mac	WHS Manager	B/H: 02 9831 9200
	_	A/H: 0427 797 945
L Phelps	Site Operations Manager	B/H: 02 9831 9200
		A/H: 0417 270 986
C Jones	Maintenance & Engineering	B/H: 02 9831 9200
	Manager	A/H: 0438 808 132

DANGEROUS GOODS COMBUSTIBLE LIQUIDS MANIFEST							
Identifier No.	Description	Chemical Name	DG Class	PG	UN No.	Maximum Capacity	Bunding
1a	Aboveground tank	Sodium hydroxide solution	8	II	1824	5000L	N/A
1b	IBC	Sulfuric Acid with more than 51% acid	8	II	1830	2000L	N/A
2a	Aboveground Tank	Nitrogen (Refrigerated)	2.2	N/A	1977	11870L	N/A
3a	Manufacturing Storage Cage	TOPAX 625	8	II	1760	1000L	√
3b	Manufacturing Storage Cage	Brutus	8	II	1760	1000L	✓
3c	Manufacturing Storage Cage	SANIMAXX	8	III	1760	800L	✓
3d	Manufacturing Storage Cage	TOPAX 32	8	II	1719	1000L	✓
3e	Manufacturing Storage Cage	Exelerate ZTF RTU	8	III	1824	500L	√
4a	QA Lab	Nitric Acid 62 – 70 %	8	II	UN2031	500L	√

Describe the safety equipme	Describe 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				
Devices and Safety Equipment					
Personal Protection Equipment					
PPE	When handling hazardous chemical, employees have access to PPE which includes the use of the following:				
	Gloves /Face field /Chemical resistant & protective Clothing & Footwear				
Safety Showers & Eye Wash Stations	If an individual is contaminated with a hazardous material they can access shower or eye wash stations to mitigate chemical ingress				
Material Containment systems					
High Sided Plastic IBC bunds	For storage, separation and containment of hazardous chemicals stored in IBCs				
Portable pallet bunds	For the storage and containment of Containers and Drums of materials such as Cleaners /Sanitisers				
Fixed Concrete Bunds	Storage and Containment of Above Ground Tanks of Sodium Hydroxide /Caustic Cleaners and Virgin and Waste Vegetable oil				
Storm Water Isolation Valves (North & South)	Isolation valves so that if spills occur the stormwater system can be closed to retain contaminated fluids at the Blacktown facility so protecting waterways and environs				
	North side – nearest Fineseat				
	South side – nearest Brickwoods				
	Stormwater drains fitted with drain filter covers (as required) and labelled highlighting links to local creeks & waterways				
Bags filled with Sand	To build retention walls/ barriers to aid in the containment of a major spill				
Spill kits	Kits containing Absorbent materials to contain spills				
	Hazchem (Yellow) Absorbent Pads & Booms and/or Granules				
	Oil / Fuel (White) Absorbent Pads & Booms and/or Granules				
Portable Pump out station interchangeable 1000litre capacity					
Dangerous Goods (DG) Cabinets	Are an important control measure and are specifically designed to keep chemicals and other hazardous materials safe and secure. Specific cabinets are designed for specific hazardous material and it's important to match the material to the storage cabinet. It is important to classify the hazardous materials (using the MSDS) and avoid storing incompatible materials together.				
Treatment systems					
Anti-pollution gear (KHS) on fryers	Fryer exhaust containing water vapor, cooking oil, odours and particulates passes through an Oil Mist Eliminator in the fryer stack and enters KleenHeat Exchange (KHS). The simple afterburner technology connects to the fryer exhaust stack and incinerates virtually all odours, oil & Volatile organic compounds (VOC) and particulates (TSP). Testing to validate performance every 3 years				

The Primary treatment using a pH controlled Dissolved Air Flocculation (DAF) unit which reduces, Grease, Nitrogen, Phosphorus, Sulphate, Suspended Solids (SS), Biological Oxygen Demand (BOD) & Ammonia to the agreed levels outlined in the Sydney Water Consent Agreement, Testing to validate performance every 2 days				
Procedures & Employee Training				
The following documents formalize requirements to support and ensure Environmental Protection and compliance to EPA license requirements:				
Environmental Policy Material Safety Data Sheets (MSDS)				
Emergency Procedure Manual				
Stormwater Management Plan including maps showing stormwater drains and flow				
Waste Management Plan				
Pollution Incident Response Management Plan				
Contractors for Waste / Recycle Service Agreement				
The following training courses are undertaken to ensure employees are aware of correct actions to take in Hazard analysis, handling chemicals and PPE use, mitigating /containing Spills and Evacuation protocols:				
Hazard /Risk Training & Analysis				
Chemical Handling & PPE use				
PIRMP training and Simulation				
Use of the Chemical resistant Portable Pumping Equipment with interchangeable 1000litre IBC- Critical				
Evacuation Training and Simulation				
_				

Minimising harm to persons on the premis

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- Activation of evacuation procedures, including the activation of audible alarms to notify the evacuation of personnel to assembly areas. These clearly communicated
 to site personnel via signage which are reinforced during induction and simulated evacuation training
- The availability and use of PPE
- The availability and use of Spill kits
- Requirement that contractors to complete OH&SE sign-on inductions
- All Persons to complete formal CoVID declarations & acknowledge site requirements to mitigate
- Contractors/Site personnel complete risk assessments / JSA (job safety analysis) & hot work permits before undertaking works

Maps

Provide a detailed map (or set of maps) showing the:

- location of the premises to which the licence relates- Figure 1
- surrounding area likely to be affected by a pollution incident- Figure 2

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).

Premise related to License no. 21243 is the area occupied by Lot 1 DP 205360 as shown below

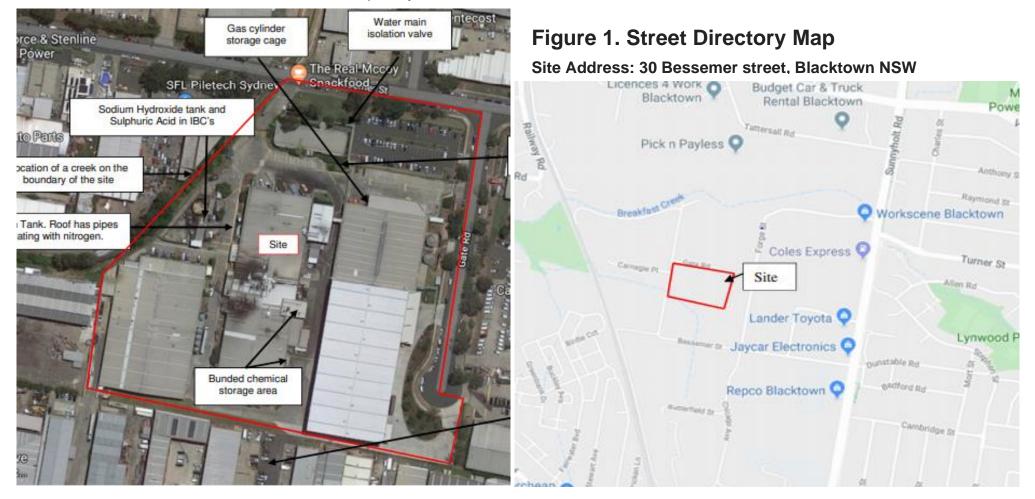
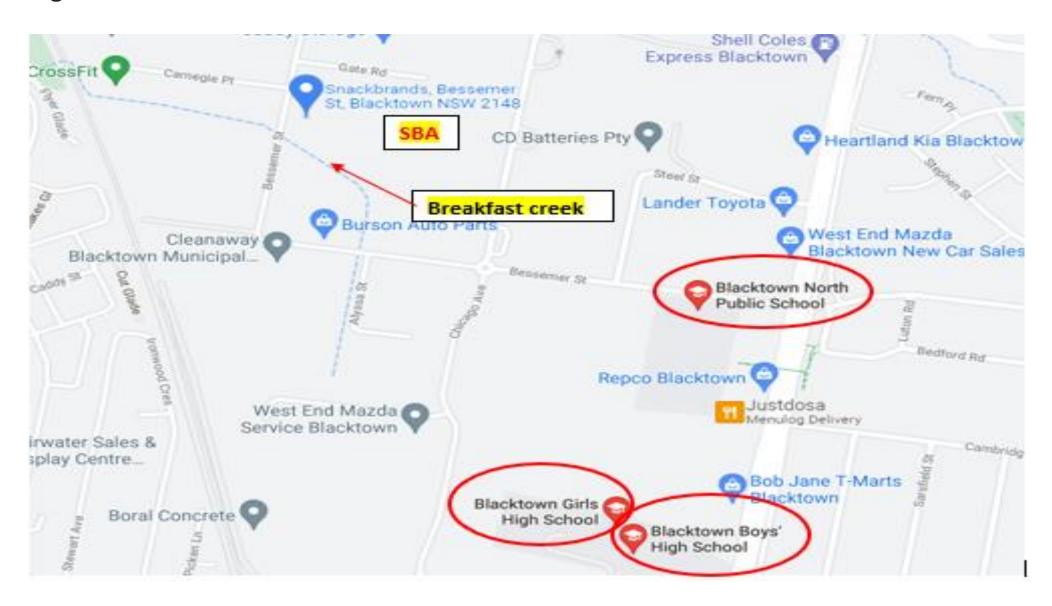


Figure 2 – Location of Snackbrands to relevant critical risk items



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