HILLSTON GIN POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

APPROVED SEPTEMBER 2023
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1. DOCUMENT PURPOSE

The pollution incident response management plan (PIRMP) details the actions to be implemented should a pollution incident occur at the premises. The plan addresses reasonably foreseeable environmentally relevant activities associated with Namoi Cotton's operations and is developed with the intent of:

- Identify environmental impacts and aspects relevant to the site.
- Minimise the risk of a pollution incident by planning and implementing controls to effectively manage the risk.
- Ensure the plan is fully implemented by trained staff, identifying persons responsible.
- Ensuring the plan is regularly tested for accuracy, currency, and suitability.
- Ensure comprehensive and timely communication about a pollution incident to staff, relevant authorities and stake holders who may be affected by the impacts of the pollution incident.

The PIRMP is to be read in conjunction with the Safety, Health, and Environmental Management System (SHEMS) developed by Namoi Cotton and for this site. This document has been developed to comply with the POEO Act in relation to the activity to which the licence relates and risks as assessed in HIL-RA-2802 Environmental Management Risk Assessment for the Hillston Gin. This risk assessment was reviewed on 15/08/2023 and PIRMP updated on 01/09/2023.

2. ENVIRONMENTAL PROTECTION LICENCE (EPL) DETAILS

Name of licensee:	Namoi Cotton Limited
Licensee ABN / ACN:	76 010 485 588 / 010 485 588
EPL number:	EPL10856
Premises name and address:	Hillston Cotton Gin Roto Road Hillston NSW 2675
Company details:	Namoi Cotton Limited 259 Ruthven Street Toowoomba QLD 4350 P: 07 4631 6100
Company contact person:	Tanya Venz Safety, Health, Environment Manager M: 0429 458087 E: tvenz@namoicotton.com.au
Website address:	www.namoicotton.com.au
Scheduled activity:	Agricultural processing
Fee based activity:	General agricultural processing

3. POLLUTION INCIDENT – PERSON/S RESPONSIBLE

3.1 PIRMP ACTIVATION

Name of person responsible:	Toby Ison
Position:	Site Manager
Business hours contact number/s:	02 6967 2951 / 0418 362677
After hours contact number/s:	0418 362677
Email:	tison@namoicotton.com.au
Alternate contact person name:	Ross Kealy (in the absence of appointed site manager)
Position:	Operations General Manager
Business hours contact number/s:	07 4631 6100 0418 739 158
After hours contact number/s:	0418 739 158
Email:	rkealy@namoicotton.com.au

3.2 NOTIFYING RELEVANT AUTHORITIES

Name of person responsible:	Tanya Venz
Position:	SHE Manager
Business hours contact number/s:	07 4631 6100 0429 458 087
After hours contact number/s:	0429 458 087
Email:	tvenz@namoicotton.com.au
Alternate responsible person name:	Ross Kealy
Position:	Operations General Manager
Business hours contact number/s:	02 6872 1453 07 4631 6100 0418 739 158
After hours contact number/s:	0418 739 158
Email:	rkealy@namoicotton.com.au

3.3 MANAGING RESPONSE TO A POLLUTION INCIDENT

Name of person responsible:	Tanya Venz
Position:	SHE Manager
Business hours contact number/s:	07 4631 6100 0429 458 087
After hours contact number/s:	0429 458 087
Email:	tvenz@namoicotton.com.au
Alternate responsible person name:	Ross Kealy
Position:	Operations General Manager
Business hours contact number/s:	02 6967 2951 07 4631 6100 0418 739 158
After hours contact number/s:	0418 739 158
Email:	rkealy@namoicotton.com.au
Alternate responsible person name:	Toby Ison
Position:	Site Manager
Business hours contact number/s:	02 6967 2951 / 0418 362677
After hours contact number/s:	0418 362677
Email:	tison@namoicotton.com.au

4. NOTIFICATION TO RELEVANT AUTHORITIES

4.1 REGULATORY AUTHORITIES

Fire & Rescue NSW and/or Rural Fire Service	000
EPA	131 555
Ministry of Health (local Public Health Unit (PHU)	02 6841 5569
SafeWork NSW	131 050
Carrathool Shire Council	02 6967 2555

4.2 NEIGHBOURS AND LOCAL COMMUNITY

Name	Address	Telephone
R Collins	"Merrowie Station" Roto Road Hillston NSW 2675	P: 02 6967 2340
P & M Storrier	"Riverview" Roto Road Hillston NSW 2675	P: 02 6967 2775

5. RISK ASSESSMENT

Appendix 1: HIL-RA-2802 Environmental Management Risk Assessment for the Hillston Gin provides a description of the hazards to human health, or the environment associated with Namoi Cotton operations at the Hillston Cotton Gin. The risk assessment identifies the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood. Controls identified and documented in the Hillston Environmental Management Risk Assessment are the pre-emptive actions to be undertaken to prevent any risk of harm to human health or the environment arising from the activities undertaken at the Hillston Cotton Gin.

6. INVENTORY OF POLLUTANTS

The following hazardous substances are held onsite and identified as potential pollutants.

Location / tank	Hazardous substance
Workshop	Oils
Gin	Acetylene
Tank 1	LPG
Tank 2	LPG
Trash Yard	Cotton trash
Bulk storage	Diesel
Chemical container	Herbicides

7. SAFETY EQUIPMENT

The Site Manager in consultation with the Safety, Health and Environmental Manager shall ensure that emergency equipment is available at the site, and appropriately located and maintained in good working order.

An equipped first aid kit that can be utilised in an emergency is located at the cotton gin building site.
Materials for handling environmental spills, etc. will include oil spill kits, together with other items as deemed to be appropriate.

Specialised equipment available for an emergency response will be maintained in a "fit for purpose" state. On call equipment will be obtained through hire companies when necessary.

The Site Manager in consultation with the Safety, Health, and Environment Manager:

- Shall maintain a list of safety and environmental emergency response equipment held at the premises.
- Ensure the ongoing availability of an adequate stock of consumable equipment; and
- Ensure all emergency equipment is being inspected, tested, and maintained as necessary.

Safety equipment that is maintained and accessible to be used to minimise the risks to human health or the environment and to contain or control a pollution incident includes:

Type of Equipment	Location	Comments
Water Truck for Fires	Parked In Mobile Equipment Parking Bay - approx. 15,000 litres	
Fire Extinguisher Station 1	Main door entrance	2 x CO2 1 hose reel
Fire Extinguisher Station 2	In front of gin stands	4 x water 1x co2 1 dry powder 4 water 2 hose reels
Fire Extinguisher Station 3	At entrance to press pit	1 x dry powder 1 x CO2 3 x water 3 hose reels
Fire Extinguisher	Feeder bay and fan bay	6 hose reels 5 hose reels 3 hydrants w/ hoses
Fire Extinguisher	Weighbridge	1 x CO2 1 x water 2 hose reels
Fire Extinguisher	Mote building	1 x dry powder 2 x CO2
Fire Extinguisher	Diesel tank	1 x dry powder

		1 hose reel
Fire Extinguisher	Trash shed	3 hose reels hydrant w/hoses
Fire Extinguisher	Moon buggy x 2	2 x water
Fire Extinguisher	Console room and kitchen	2 x CO2 1 dry powder 1 blanket
Fire Extinguisher	Switch room	2 x CO2
Fire Extinguisher	Upper part of ginning machinery (inside)	4 x water 8 hose reels
Spare Fire Extinguishers	Main gin area	2 of each
Spill Kit 1	Main press hydraulics	
Spill Kit Spares	Hazardous goods shed	
First Aid Kit 1	Console room permanent fixture	
First Aid Kit 2	Console room grab kit	
Frontend Loader	Bale pad area	
Stretcher Bed	Console room	
BA Equipment	Console room	
Gas Monitor	Console room	

8.COMMUNICATION WITH NEIGHBOURS AND THE LOCAL COMMUNITY

Community notification shall be undertaken at the determination of the Safety, Health and Environment Manager or the EPA Compliance Liaison Officer or the Executive General Manager.

Names and contact details of relevant community members as defined in section 4.2 of this PIRMP, including local and adjacent residents.

The following notification methodology is proposed to be utilised as required:

- Early warnings: same day telephone notification to landholders who may be affected by the pollution incident over the subsequent 24-hour period.
- Updates: follow up phone calls to all landholders who may have been notified by the initial early warning. Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, Community Consultative Committee meetings, Namoi Cotton website, media statements or any other strategy.

Information provided to the community will be relevant to the pollution incident and may include the following details:

- Type of pollution incident that has occurred.
- Potential impacts for local landholders and the community.
- Site contact detail.
- Advice or recommendations based on the pollution incident type and scale.

9. MINIMISING HARM TO PERSONS ON THE PREMISES

The Site Manager in consultation with the Safety, Health, and Environment Manager (or delegate) shall ensure that emergency equipment is available at the site, and appropriately located and maintained in good working order.

Minimum emergency equipment at the site is identified in section 7 of this PIRMP which specifies the following resources that are available for minimising harm to persons on the premises:

- A serviced and maintained first aid kit that can be utilised in an emergency is located at the cotton gin building site.
- Materials for handling environmental spills, etc. will include oil spill kits and sandbags, together with other items as deemed to be appropriate.

Specialised equipment available for an emergency response will be maintained in a “fit for purpose” state.
On call equipment will be obtained through hire companies when necessary.

The Site Manager in consultation with the Safety, Health and Environment Manager or delegate will:

- Maintain a list of safety and environmental emergency response equipment held at the premises.
- Ensure the ongoing availability of an adequate stock of consumable equipment.
- Ensure all emergency equipment is being inspected, tested, and maintained as necessary.

10. PRE-EMPTIVE ACTIONS TO REDUCE THE RISK OF HARM

Safety, Health, and Environment Manager (or delegate) in consultation with the person(s) responsible for the activity (Site Manager) will determine how the risks can be successfully remedied to ensure sound environmental management. This process will be undertaken with the supervision of the Ginning Operations Manager and General Manager.
This may include updating the Namoi Cotton workplace policies or associated documents to cover any further identified management measures and mitigation strategies.

During the Environmental Risk Assessment, the key environmental risks identified were:

- Fire – Cotton seed, bales, modules, and cotton mulch/trash.
- Cotton Mulch escaping off-site in a severe weather event (flood).
- Redundant plant and equipment leaving the site in a severe weather event.
- Plastic generated through operations leaving the site by wind/flood.
- Large spills (oil/gas/fuel/diesel), storage spill or delivery spill and
- Dust.

The key to effective prevention of harm to the environment is risk assessment, procedure development, monitoring, and training. During operational activities, Namoi Cotton’s inspections and preventive actions include:

- Activity specific and daily risk checks.
- Development of work procedures in consultation with relevant Namoi Cotton staff to manage and mitigate environmental risks.
- Daily inspections of active work Site.
- Issue and quick close-out of non-compliance notices.
- On-going environmental training; and
- Environmental audits.

The Namoi Cotton intranet contains records of the sites Environmental Management Risk Assessment, Environmental Management Plans which include Waste Management and Pollution Incident Response Management Plans to assist employees to manage environmental risk and incidents.

In addition, the following guidance measures are to be implemented (if appropriate) to minimise the Environmental Risk of a pollution incidents occurring due to spillage, leaks, storage of hazardous materials, water storage discharge, dust, or fire.

10.1 SPILLS AND LEAKS (CHEMICALS, FUEL, HAZARDOUS LIQUIDS, COTTON MULCH/TRASH)

- Plan and implement works involving the use of chemicals, dangerous goods, or other potential contaminants, to minimise the possibility of pollution.
- Use and store chemicals and dangerous goods strictly in accordance with relevant legislation, manufacturer instructions.
- Establish transport, handling, storage, and application methods (with the relevant method statement) to prevent chemical, fuel, and lubricant spillage on or around the site.
- Keep adequate quantities of emergency response materials, such as oil spill kits, absorbent materials, sandbags, flocculating agents, and pH buffer solutions, readily available and in designated compounds.
- Provide bunded areas for refuelling or maintenance of plant and equipment, mixing cutting oil with bitumen or spill Kits for managing spill areas.
- Ensure chemical drums removed from bunded areas are returned to a secured storage area.
- The major response to spills and leaks will involve containing the offending material.
- Where safe to do so, install containment measures such as sandbags, booms, earth bunds or cut drains to capture and retain spilled material and prevent it from leaving the site, entering any watercourse or external property.
- Inspect the Site post heavy rain events or flood events.

10.2 STORAGE OF LIQUIDS (CHEMICALS, FUEL, HAZARDOUS MATERIALS)

- Bund and cover liquid storage areas – liquids stored can be captured within the bund.
    - If there is no bunding the interim process is to store liquid waste of all kinds in safe areas to minimise scape off-site, with the mitigation steps for any spill to be enacted in the above section.

10.3 WATER STORAGE DISCHARGE

- Ensure records are kept of water quality checks (for EPA licensed Sites with water testing conditions), discharges and any remedial actions taken.
- Regularly inspect drainage to Site dams, exit channels and gates and site levee.
- Carry out maintenance to site drainage.

10.4 FIRE

- Firefighting equipment will be available on Site to facilitate an immediate response to a fire incident and help ensure that safety of public and property.
- No non-ginning activities with the potential to generate sparks will take place in the open on total fire ban days.
- Provide personnel involved in work where there is a risk of fire with adequate training about fire prevention, safety, and basic firefighting skills.
- Isolate hot modules, bales, or cotton seed.
- Monitor cotton seed temperatures.
- Advise growers to not deliver hot modules.

10.5 DUST

- Monitor dust created by mobile plant operation for site.
- Use water trucks to reduce mobile plant dust.
- Monitor dust from gin cyclones.

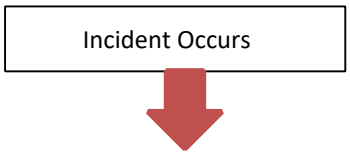
11. MAPS

Appendix 2 Provides a detailed set of maps showing the:

- Location of the premises to which the licence relates.
- Surrounding area likely to be affected by a pollution incident.
- Location of potential pollutants on the premises.
- Location of any stormwater drains on the premises.
- Monitoring Point 1 - Stormwater discharge.

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

If a pollution incident occurs the following actions should be taken by the Site Manager or delegate:
Below is the Incident Response Protocol:



1. ASSESS RISK MATERIALITY (POLLUTION INCIDENT OCCURS)

- Call 000 if the incident presents an immediate threat to human health or property or there are injured persons.
- Ensure the safety of all persons on the site.
- Identify the severity, risks, and extent of the incident:
  - What is the substance emitted?
  - What are its properties?
  - Is there a risk to health and safety?
  - Do you have the necessary PPE to manage the emission?
  - What is the volume of the emission?
- Assess potential for off-site impacts to the community and the environment.
- If the emission has the potential to cause material harm to persons or property or the environment, proceed to notify.

2. RESPOND

Prioritise the spread of or emission from discharging any further to minimise the impact of potential and harm and the discharge spreading off-site.

- If a substance has been released, read “Safety Data Sheet” and label for response.
- If safe to do so, stop the source of the emission.
- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission or leak from spreading.
- Clean up and remedial actions to restore the environment.
- Disposal of pollutants in accordance with SDS and local regulations
- If pollutant or contaminant cannot be identified wait for relevant public service (e.g., Fire and Rescue) or instruction from the Environment, Health and Safety Manager or delegate.

3. NOTIFY

Contact key individuals:

- Responsibilities for activating the PIRMP and making notifications as detailed in section 3 of this PIRMP.

- Notification to be made and coordination of relevant authorities as set out in responsibilities assigned in section 3 of this PIRMP.
- Notification to relevant authorities to be made in pollution incident causes material harm.
- Following control of the incident the Safety, Health and Environment Manager or delegate shall, if required by legislation making notification for the following:
    - Regulating Environmental Protection Agency.
    - WorkCover Authority.
    - Police, Fire and Rescue NSW.
    - Community members as detailed in section 8 of this PIRMP.

4. REVIEW

- Investigate the incident and assist the EPA and investigators with external enquiries (if applicable).
- Complete internal reporting.
- Test the effectiveness of the PIRMP within one month after the incident to ensure controls are replenished.

12.1 COORDINATING WITH PERSONS INTERNALLY

If a pollution incident occurs in the course of an activity at the site so that material harm to the environment is caused or threatened, the person carrying out the activity must immediately implement this PIRMP. Responsibilities for the actioning of the PIRMP, controlling the incident and making notifications are detailed in section 3 of this PIRMP.

Responsibilities for the actioning of the PIRMP, controlling the incident and making notifications are detailed in section 3 of this PIRMP.

If a material pollution incident occurs at the site or outside the site as a consequence of the site activities then the Site Manager or Acting Site Manager or senior employee for the site must promptly notify (by telephone) notify the Environment, Health and Safety Manager and General Manager. The Environment, Health and Safety Manager and the General Manager must then promptly (within two hours of discovering a pollution incident is present) advise the Executive General manager and the EPA Compliance Liaison Officer of any notification they decide is a pollution incident.

12.2 COMMUNICATING WITH THE COMMUNITY

Community notification shall be undertaken at the determination of the Environment, Health and Safety Manager or the EPA Compliance Liaison Officer or the Executive General Manager.

Names and contact details of relevant community members are listed in section 4, including local and adjacent residents. The following notification methodology is proposed to be utilised as required:

- Early warnings: same day telephone notification to landholders who may be affected by the pollution incident over the subsequent 24-hour period.
- Updates: follow up phone calls to all landholders who may have been notified by the initial early warning. Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, Community Consultative Committee meetings, Namoi Cotton website, media statements or any other strategy.

Information provided to the community will be relevant to the pollution incident and may include the following details:

- Type of pollution incident that has occurred.
- Potential impacts for local landholders and the community.
- Site contact details.
- Advice or recommendations based on the pollution incident type and scale.

12.3 RESPONSIBILITIES AND DUTIES

If a pollution incident occurs in the course of an activity at the site so that material harm to the environment is caused or threatened, the person carrying out the activity must immediately implement this PIRMP. In the event that the person authorised to activate the PIRMP is not able to be contacted, the person notifying the activity must follow the notification process set out in section 3.

13. REPORTING

The relevant information to be provided for a pollution incident required under *section 150 of the POEO Act,* consists of the following:

- The time, date, nature, duration, and location of the pollution 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 pollution incident occurred (including the cause of the pollution incident, if known).
- The action taken or proposed to be taken to deal with the pollution incident and any resulting pollution or threatened pollution, if known.
- Other information prescribed by the regulators.

This information will be recorded in the Pollution Incident Notification Form (please see Appendix 4) and submitted/communicated to the Environment, Health and Safety Manager and the EPA Compliance Liaison Officer**.**

14. FOLLOW UP ACTION

Subsequent to a pollution incident the following must be undertaken:

- Undertake further monitoring/testing if required.
- Complete pollution incident report.
- Organise restocking of spill equipment.
- Implement corrective actions to avoid reoccurrence.
- Test the PIRMP within one month of a material incident.

15. STAFF TRAINING

All Namoi Cotton operational workers shall be trained (and deemed competent) in environmental management (mandatory training module at Namoi Cotton) upon commencement of work and annually as a refresher. In consultation with the Safety, Health, and Environment Manager (or delegate), the site manager must ensure that information, training, and instruction provided to workers is suitable and adequate with regard to the nature of the environmental activities carried out by workers, the nature of the risks associated with the work and the control measures implemented.

The information, training and instruction should be provided in a way that is readily understandable.
Training to enable adequate response to a pollution incident will provide:

- Instructions for managing and containing a pollution incident.
- Instructions for the safe use of emergency response and containment equipment.
- Details of responsibilities for the notification requirements for pollution incidents.
- Legal requirements.
- Annual training drill for a pollution incident.

- Familiarity with the provisions of this PIRMP.

Outcomes of testing of the PIRMP or when changes are made to the PIRMP will be communicated to all workers via training and instructions, and/or toolbox talks, email communications or Safety, Health, and Environment Working Group Meetings.
All records will be retained by the Safety, Health, and Environment Team and as per Namoi Cotton Corporate document control procedure.

16.TESTING OF THE PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.
This plan will be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner.

The Safety, Health, and Environment Manager (or delegate) will coordinate the testing of the sites PIRMP and retain a record of the test which includes:

- Date of testing exercise.
- Site/location of testing.
- Persons involved in testing.
- Type of test (live drill / desktop drill).
- Incident classification (Environmental / near miss / equipment damage / injury or illness).
- Details and circumstances of pollution incident tested.
- Extent of possible pollution and impact severity.
- Who notification should be made to.
- Actions taken as part of the exercise.
- Findings of the testing of PIRMP.
- Follow up actions if required.
- Next scheduled date for testing of the PIRMP.

All records will be retained by the Safety, Health, and Environment Team and as per Namoi Cotton Corporate document control procedure.

Testing of the PIRMP has been conducted on the following dates:

Activity	Type of Drill	Location	Attendance	Date Completed
Test PIRMP	Drill (desktop)	Online/desk-top	As attached - Toby Ison (Site Manager)	07/09/2022
Test PIRMP	Drill (simulation)	Hillston Trash Yard	As attached - Toby Ison (Site Manager)	19/10/2023

17. REVIEW AND UPDATING OF PIRMP

It is the responsibility of Safety, Health, and Environment Manager (or delegate) to ensure the PIRMP will be reviewed and updated every 12 months.
The PIRMP will record:

- The date of review.

- Person and position of person who reviewed the PIRMP.
- Version number.
- Next review date.
- Details of changes made to the PIRMP.

A copy of the updated PIRMP will be provided to the authorised person for uploading onto the Namoi Cotton website as per legal requirements.

All records will be retained by the Safety, Health, and Environment Team and as per Namoi Cotton Corporate document control procedure.

Version	Issue / Review date	Author / Reviewer	Position	Nature of review / amendment
1	11/06/2015	Bailey Garcha	SHE Advisor	Document developed
2	01/07/2020	John Fox	SHE Advisor	Annual review
3	23/04/2021	John Fox	SHE Advisor	Annual review Changes to personnel and key contacts
4	21/07/2022	Tanya Venz	SHE Manager	Annual review Changes to document format Added document control and site identification number. Inclusion of additional content in line with regulatory requirements and guidelines Changes to personnel and key contacts Next review: 21/07/2023
5	27/09/2023	Tanya Venz	SHE Manager	Review against risk assessment updated 19/10/2023. Added table to include dates the PIRMP was tested. Annual review completed. Next review: 27/09/2024.

END OF DOCUMENT

APPENDIX 1: ENVIRONMENTAL RISK ASSESSMENT

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Cotton Mulch/ • Bale/ Module/ • Seed/ • Commodities • –Fires (“Products”)	• Fires	• Air • Soil • Water	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Regularly inspect Products for hot spots. • Isolate Products suspected of having hot spots. • Advise Growers not to deliver Products with hot spots. • Water trucks available on Site. • Supply and maintenance of firefighting equipment. • Train staff on procedures to isolate Products with hot spots and to manage Products which may be subject to fire. • Site Waste Management Policy. • Continued Risk Assessments. • Environmental related training/certification.	C	2	Moderate	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Dirty Water • Runoff	• There may be excessive runoff from large rain events that could possibly enter the diversion drains and Site dam	• Surface water (Rain)	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Run off drainage directed to on Site storage dam. • Regular inspection of drainage. • Maintenance of drainage. • Emergency drainage implemented if required. • Site Waste Management Policy. • Train staff on drainage maintenance. • Train staff on clean-up process if required. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Cotton Mulch	• Cotton Mulch	• Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Cotton Mulch from the ginning process is to remain on Site in windrows for organic breakdown, unless approved otherwise by the Chief Operations Officer and CEO. • Staff need to check the integrity of the Site levee (if applicable) on a regular basis. • Maintenance of levee if required. • Monitor Cotton Mulch on a regular basis for wind blowing, odour, leaching and run-off from Site. • Inspect Cotton Mulch promptly after storm or flood event. • If necessary, install dirt bunding around Cotton Mulch if there is an imminent risk of it escaping off-Site. • Train staff in the management of Cotton Mulch stored on Site. • Continued Risk Assessments. • Environmental related training/certification for staff. • Site Waste Management Policy. PIRMP developed for the Site. • Seek external legal advice on a continued basis for Cotton Mulch. • Continued project to investigate the use of Cotton Mulch for fuel generation.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Redundant Plant and Equipment	• Property and items	• Air • Surface Water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	During the Environmental Risk Assessment various redundant plant and equipment was identified. Currently the process is to log what items can be reused and what items can be salvaged by an external salvage contactor. Due to the remote location of the Sites this will be a continuing process over the next 12 months. After the identification of reusable items and collection of items by the external salvage contractor the balance of non-useable items will be disposed of after such review by Management. In the interim the following actions are applicable: • Store redundant plant and equipment securely. • Train staff in the storage of redundant plant and equipment. • Check the redundant plant and equipment after severe storms and flood events. • Continued Risk Assessments. • Site Waste Management Policy. • Environmental training/certification for staff.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• Plastic	• Fire, Blowing Offsite	• Air • Surface Water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Recycle cotton module plastic. • Recycle other plastic if possible. • Dispose of plastic which is not recyclable in waste bins. • Store plastic which is ready to be collected by recycling contractor in secure area. • To minimise plastic on Site, have the recycled plastic and waste bins collected by external contractors on a regular basis. • Inspect Site for windblown plastic items on a regular basis. • Train staff on plastic recycling and disposal process. • Site Waste Management Policy. • Environmental related training/certification for staff.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• Empty Chemical Drums	• Leaching – Chemicals could end up offsite during an extreme weather event.	• Air • Surface Water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Regularly check site for empty Chemical Drums. • Store Chemical Drums in the appropriate area. • Store away from drainage areas and waterways. • Train staff on Chemical Drums storage and disposal process. • Arrange for collection of Chemical Drums by Drum muster or dispose of at waste facility to reduce the quantity of Chemical Drums on Site. • Site Waste Management Policy. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• Waste oil vat on Site	• Accidental spill, leak, or loss of integrity of storage container	• Surface water (Rain) • General Spill • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	B	3	Moderate	• Restrict the quantity stored on Site, currently 5,000L. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for waste oil vats to mitigate spills. • Train staff on the use of waste oil vats and transfer of waste oil to and from containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy for spills. • Arrange for the collection of used waste oil on a regular basis by an external contractor to minimise the quantity of oil stored on Site. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site. **Management investigating the implementation of Bunded Storage Area. Residual risk assumes currently not implemented.**	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Hydrocarbons (Oil for Mobile Equipment)	• Oil/Fuel Water • Separator • (Workshop) may overflow or leak or spill	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	B	3	Moderate	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for oil –mobile plant to mitigate spills. • Train staff on the use of and transfer of oil –mobile plant and containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the oil –mobile plant away from drainage areas and boundaries near waterways. • Arrange for the collection of used oil – mobile plant on a regular basis by an external contractor to minimise quantity stored on Site. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• General Site Dust	• Mobile Plant Site Dust	• Air	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	D	2	Moderate	• Monitor dust from operations. • Use water trucks to mitigate against dust. • Train staff on use of water trucks for dust control. • Site Waste Management Policy. Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Oils (Engine, Hydraulic) and Diesel	• Failure in machinery causing a spill	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	2	Moderate	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for engine oil to mitigate spills. • Train staff on the use of and transfer of engine oil and containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the engine oil away from drainage areas and boundaries near waterways. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• Dust from Ginning Process	• Dusty Environment from Ginning	• Air	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Low	• Monitor dust during operations. • Maintenance and inspections of Dust House (if any). • Maintenance and inspections of dust Gin cyclones. • Train staff in the use of Dust House (if any) and dust Gin cyclones. • Site Waste Management Policy. • Continued Risk Assessments. • Environmental related training/certification for staff.	B	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Diesel	• Diesel Tank (hose)/separator system may leak over a period of time unnoticed or have its integrity compromised and fail	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for diesel tanks to mitigate spills. • Train staff on the use of and transfer of diesel. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the diesel tanks away from drainage areas and boundaries near waterways. • Bunded. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENSE	RISK	
• Water Storage Dams	• May overflow during extreme wet weather events or have its integrity compromised and fail	• Surface water (Rain)	• Adjacent Stock Route • Adjacent Floodway • Local Waterways • Adjacent Neighbours	C	3	Moderate	• EPA License obtained to permit water discharge off-Site via designated points. • Undertake regular inspection of the Water Storage Dam and exit drainage and discharge points. • Integrity maintenance of Site drainage. • Water testing of water discharged from Site. • Train staff on water testing and EPA Licence process. • Continued Risk Assessments. • Site Waste Management Policy. • Environmental related training/certification for staff.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Empty Grease, Diesel/Fuel Containers • "EGDFC"	• Leaching - and could end up Offsite in an extreme weather event.	• Air • Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Regularly check site for empty EGDFC. • Store EGDFC in the appropriate storage area. • Store away from drainage areas and waterways. • Train staff on EGDFC storage and disposal process. • Arrange for collection of EGDFC by external contractor or dispose of at waste facility to reduce the quantity of EGDFC's on Site. • Site Waste Management Policy. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
Diesel/Petrol	Accidental spill, leak, or loss of integrity of storage container	Surface water (Rain), General spill, Soil	Soil On Site Workers Site Dam Adjacent Stock Route Adjacent Floodway Water Aquifer Public Waterway Adjacent Neighbours	B	3	Moderate	• Restrict the quantity stored on Site, currently 5,000L. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for fuel tanks to mitigate spills. • Train staff on the use of and transfer of fuel from storage tanks and containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy for spills. • Train staff on clean up procedures. • Isolate the fuel tanks and containers away from drainage areas and boundaries near waterways. • Continued Risk Assessments. • Environmental related training/certification for staff. • Site Waste Management Policy. • PIRMP developed for the Site. • Bunding for fuel tanks. • Maintenance of refuelling equipment.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Sewage	• May back up during extreme wet weather events or have a pipe leak or burst	• Surface water (Rain) • Sewage water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	2	Moderate	• Restrict the quantity stored on Site. • Undertake regular inspections for sewage system and rectify leaks or issues promptly. • Redesign of the storage and use process for sewage to mitigate spills. • Carry out maintenance. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate sewage away from drainage areas and boundaries near waterways. • Arrange for the collection of sewage on a regular basis by an external contractor. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

• Steel/Metal	• Property and items	• Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	2	Low	• Recycle steel if possible. • Dispose of steel which is not recyclable in waste bins. • Store steel which is ready to be collected by recycling contractor in secure area. • To minimise steel on Site, have the recycled steel and waste bins collected by external contractors on a regular basis. • Inspect Site for steel on a regular basis. • Train staff on steel recycling and disposal process. • Continued Risk Assessments. • Site Waste Management Policy. • Environmental related training/certification for staff.	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Lubricant	• May be spilt within the Site	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	1	Low	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for lubricants to mitigate spills. • Train staff on the use of and transfer of lubricants and containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the lubricants away from drainage areas and boundaries near waterways. • Arrange for the collection of used lubricants on a regular basis by an external contractor to minimise the quantity stored on Site. • Continued Risk Assessments. • Environmental related training/certification for	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Grease	• May be spilt within the Site	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	1	Low	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for grease to mitigate spills. • Train staff on the use of and transfer of grease containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the grease away from drainage areas and boundaries near waterways. • Arrange for the collection of used waste grease on a regular basis by an external contractor to minimise the quantity on Site. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site. **Management investigating the implementation of Bunded Storage Area.**	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENSE	RISK	
• Paints	• May be spilt within the Site	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	1	Low	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly or dispose in waste bins for the Site. • Redesign of the storage and use process for paint to mitigate spills. • Train staff on the use of and transfer of paint. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the paint away from drainage areas and boundaries near waterways. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site. **Management investigating the implementation of Bunded Storage Area.**	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENCE	RISK	
• General Agricultural Chemicals (Herbicides)("GAC")	• May be spilt within the Site	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	1	Low	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for GAC to mitigate spills. • Train staff on the use of and transfer of GAC containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the GAC containers away from drainage areas and boundaries near waterways. • Arrange for the collection of used GAC by Drum Muster on a regular basis by an external contractor. • Train staff on interim storage and disposal of GAC containers. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site. **Management investigating the implementation of Bunded Storage Area.**	B	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENCE	RISK	
• Fuel supply trucks (diesel)	• May have an accident whilst entering the site and have fuel released to the environment	• Surface water (Rain) (In case of accidents) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	B	4	Moderate	• Restrict the quantity delivered to and stored on Site. • Speed limits on Site for fuel trucks. • Redesign fuel delivery and receipt process to mitigate spills. • Train staff on fuel transfer process. • Supply spill kits to mitigate the spread. • Site Waste Management Policy. • Train staff on clean-up process. • Isolate transfer process away from drainage areas and waterways. • Continued Risk Assessments • Training/certification for staff. • PIRMP developed for the Site. • Fuel tank bunded area.	A	3	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Liquid Petroleum Gas	• May be accidently left open or mishandled for gas to be released	• Air	• On Site Workers • Adjacent Neighbours • Air	B	2	Low	• Restrict the quantity stored on Site. • LPG Gas tanks installed by licensed contractor. • Undertake regular inspections for leaks of storage tanks and pipes, report leaks to ELGAS promptly. • Redesign of the storage and use process for gas tank to mitigate spills. • Train staff on the use of and transfer of gas. • Site Waste Management Policy. • Train staff on emergency procedures. • Training/certification for staff. • PIRMP developed for the Site.	A	2	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

• Tyres	• Property and items Fire	• Air • Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	3	Moderate	• Recycle tyres for alternate use on Site if possible. • Dispose of tyres at licensed waste facility or for collection by external contractor. • Store tyres which are ready to be collected by external contractor in secure area. • To minimise tyres on Site, have the recycled tyres collected by external contractors on a regular basis. • Inspect Site for tyres on a regular basis. • Train staff on tyre recycling and disposal process. • Do not store tyres near waterways. • Continued Risk Assessments. • Site Waste Management Policy. • Environmental related training/certification for staff.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

				INHERENT RISK		RESIDUAL RISK	RESPONSIBILITY

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	LIKELIHOOD	CONSEQUENCE	RISK	PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	LIKELIHOOD	CONSEQUENCE	RISK	
Non-chemical Containers	Property and items	Air Surface water Soil	Soil On Site Workers Site Dam Adjacent Stock Route Adjacent Floodway Water Aquifer Public Waterway Adjacent Neighbours	C	2	Low	• Recycle Non-chemical Containers if possible. • Dispose of Non-chemical Containers which are not recyclable in waste bins. • Store Non-chemical Containers which are ready to be collected by recycling contractor in secure area. • To minimise Non-chemical Containers on Site have the recycled Non-chemical Containers and waste bins collected by external contractors on a regular basis. • Inspect Site for Non-chemical Containers on a regular basis. • Train staff on tyre recycling and disposal process. • Continued Risk Assessments. • Site Waste Management Policy. • Environmental related training/certification for staff.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENCE	RISK	
• Waste Bins and General Waste	• General rubbish blowing off-Site	• Air • Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	2	Low	• Check waste bins for integrity on a regular basis. • Train staff on use of waste bins - maintenance/what can be disposed in which waste bins. • To minimise waste on Site, have waste bins collected by external contractor for disposal on a regular basis. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer
• Excess Cotton Lint • Off-Cuts	• Blow off-Site!	• Air • Surface water • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	C	2	Low	• Monitor excess Lint Off-Cuts on Site. • Collect excess Lint Off-Cuts by sweeping or retrieval process. • Provide and maintain equipment to enable collection of excess Lint Offcuts. • Train staff in collection and disposal of excess Lint Off-Cuts. • Site Waste Management Policy. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

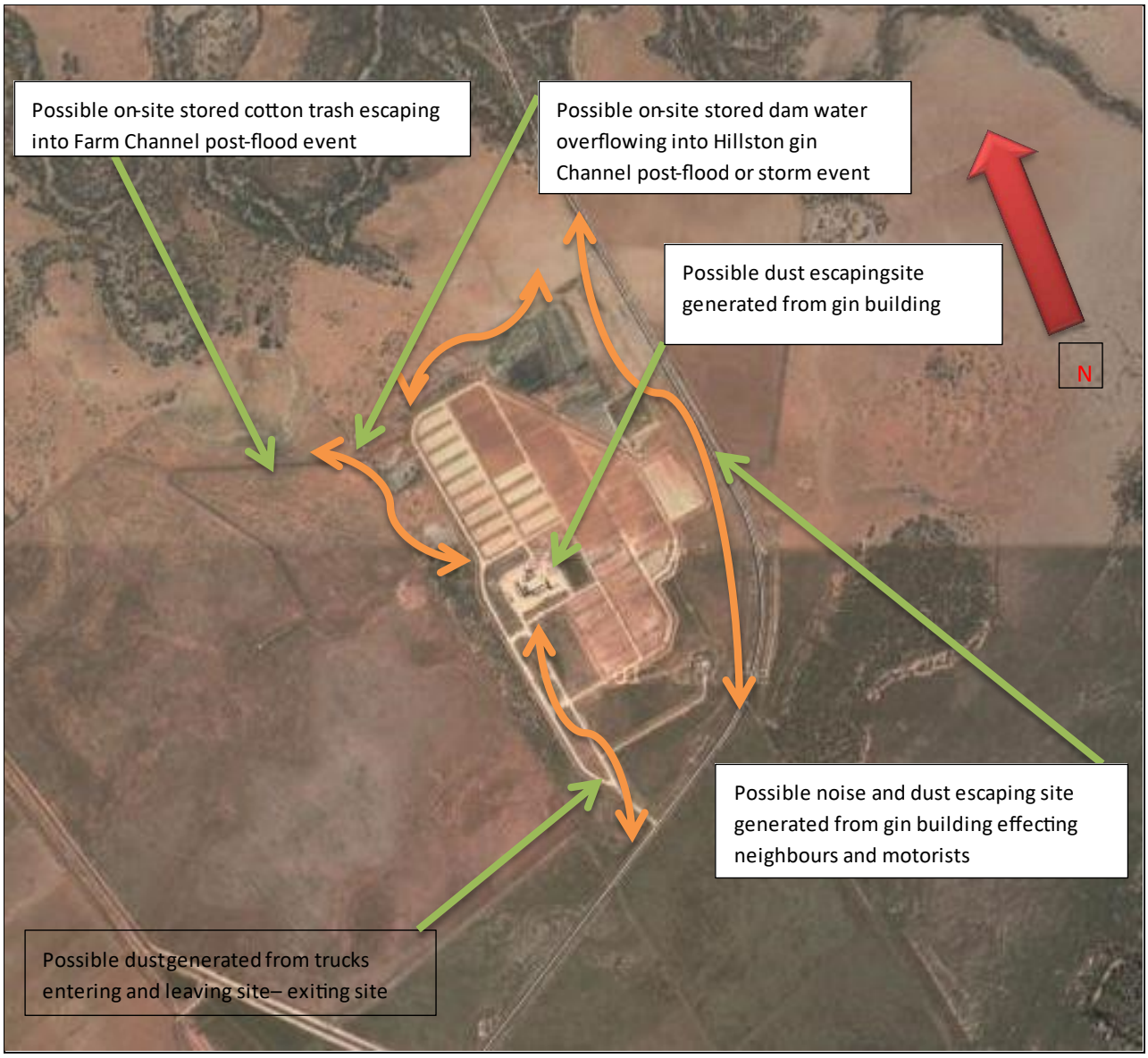
POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENCE	RISK	
• Effluent removal trucks (possible onsite accident)	• May have an accident leaving the surface facilities area (whilst still on Namoi Cotton property)	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	B	2	Low	• Restrict the quantity stored on Site. • Redesign sewage receipt process to mitigate spills. • Train staff on sewage collection process. • Supply spill kits to mitigate the spread of spills. • Site Waste Management Policy. • Train staff on clean-up process. • Isolate transfer process away from drainage areas and waterways. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site. • Sewage tank bunded area.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

Unleaded Petrol	May be spilt within the Site	Surface water (Rain) Soil	Soil On Site Workers Site Dam Adjacent Stock Route Adjacent Floodway Water Aquifer Public Waterway Adjacent Neighbours	B	2	Low	• Restrict the quantity stored on Site. • Undertake regular inspections for leaks of storage containers and rectify container leaks promptly. • Redesign of the storage and use process for unleaded petrol to mitigate. • Train staff on the use of and transfer of unleaded petrol containers. • Supply spill kits to mitigate the spread of spills and train staff to use spill kits. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the unleaded petrol away from drainage areas and boundaries near waterways. • Continued Risk Assessments.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

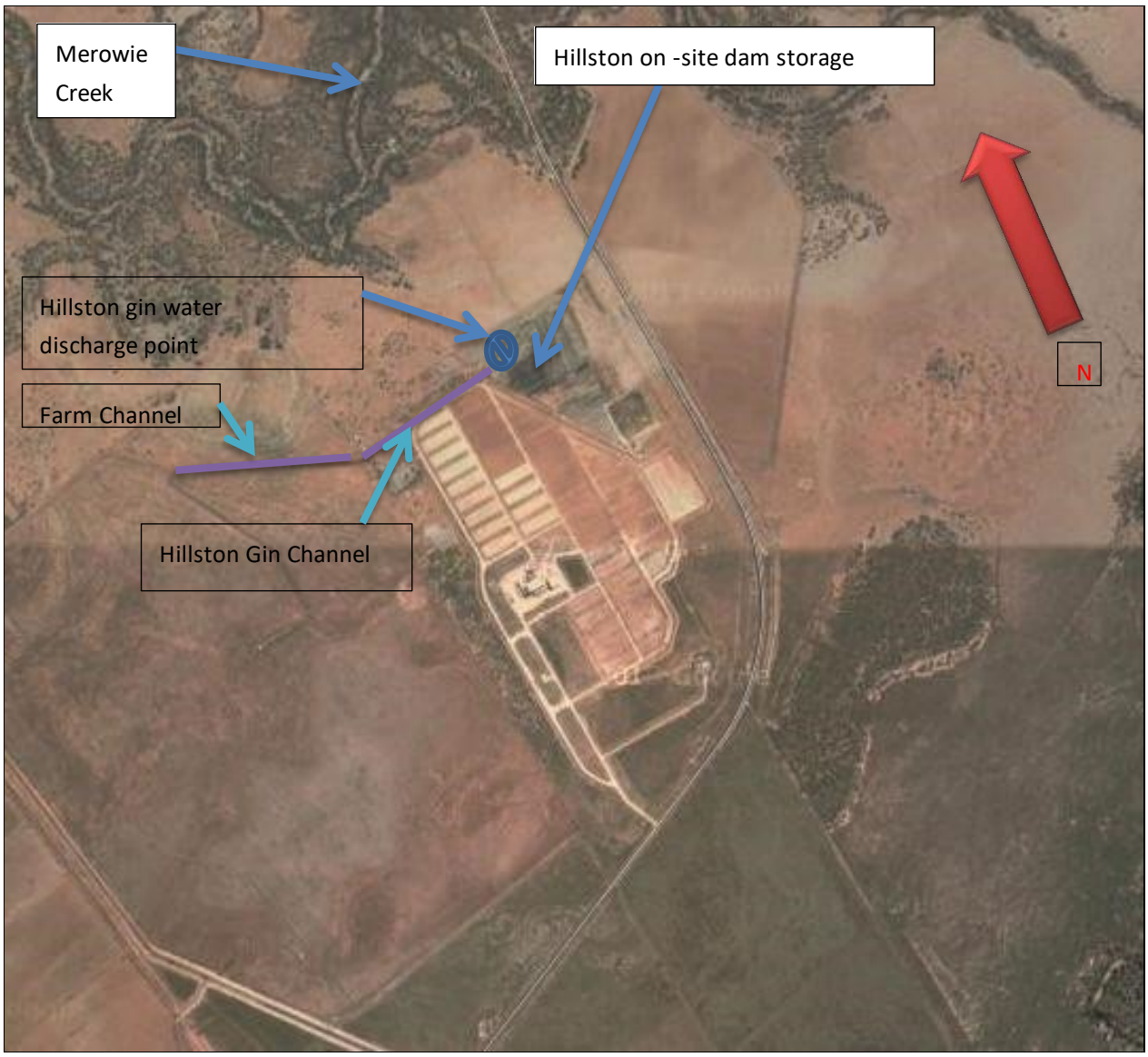
POTENTIAL POLLUTANT/ACTIVITY	DESCRIPTION OF HAZARD	POTENTIAL PATHWAY (MEDIA)	POTENTIAL RECEPTOR POLLUTION RISK	INHERENT RISK			PRE-EMPTIVE/MANAGEMENT ACTION OR CORRECTIVE ACTION PLAN	RESIDUAL RISK			RESPONSIBILITY
				LIKELIHOOD	CONSEQUENCE	RISK		LIKELIHOOD	CONSEQUENCE	RISK	
• Absorbents (spent oil spill material)	• Incorrect disposal	• Surface water (Rain) • Soil	• Soil • On Site Workers • Site Dam • Adjacent Stock Route • Adjacent Floodway • Water Aquifer • Public Waterway • Adjacent Neighbours	B	1	Low	• Redesign disposal process for absorbents. • Train staff on the disposal of absorbents. • Site Waste Management Policy. • Train staff on clean up procedures. • Isolate the absorbents away from drainage areas and boundaries near waterways. • Continued Risk Assessments. • Environmental related training/certification for staff. • PIRMP developed for the Site.	A	1	Low	1st – Gin Manager 2nd – EH&S Manager 3rd – Chief Operations Officer 4th – Chief Executive Officer

APPENDIX 2: SITE PLANS

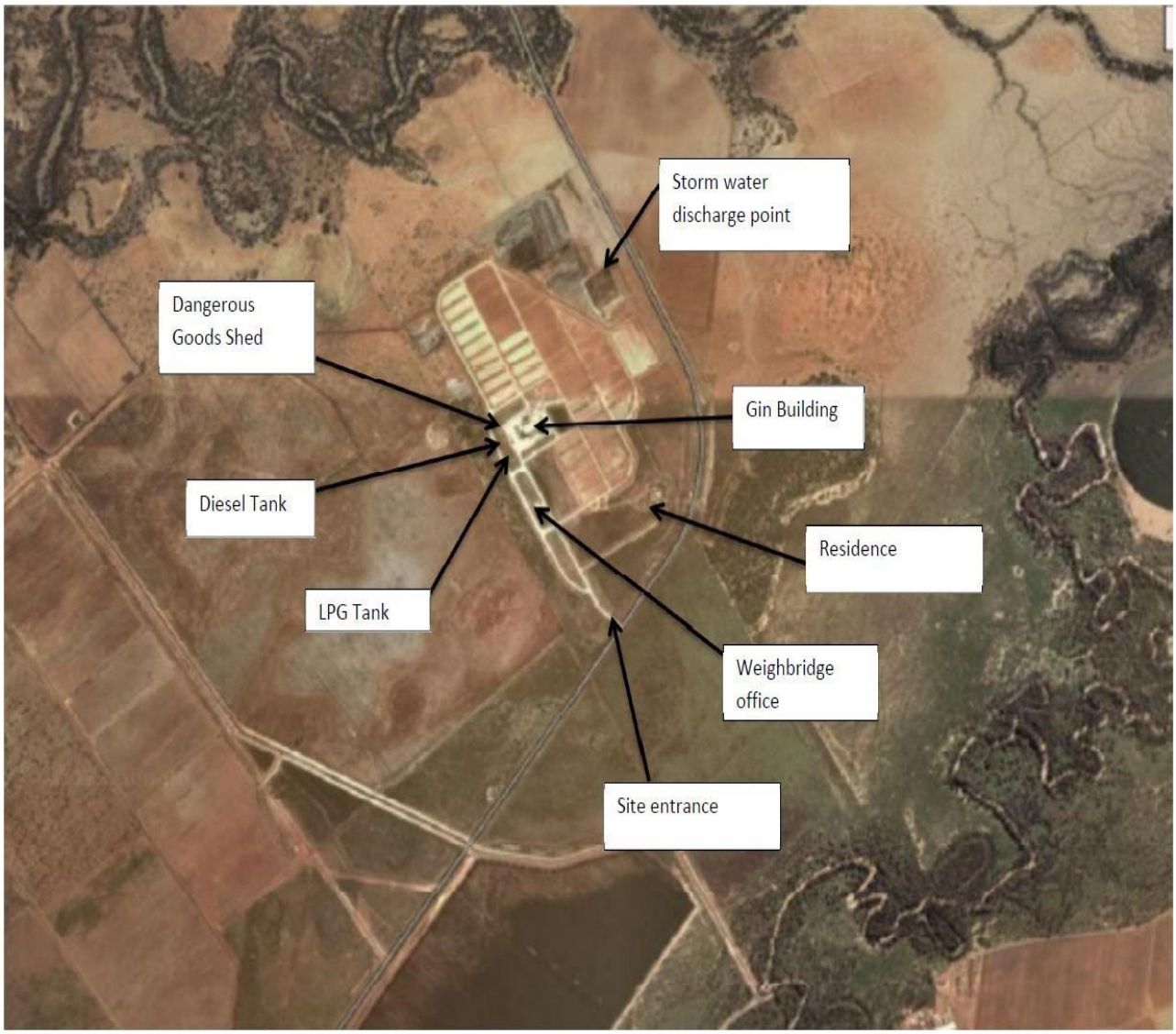
POSSIBLE POLLUTION ZONES



WATER DISCHARGE POINTS



SITE PLANS


Storm water discharge point
Dangerous Goods Shed
Gin Building
Diesel Tank
Residence
LPG Tank
Weighbridge office
Site entrance

APPENDIX 3: PIRMP TEST