



Pollution Incident Response Management Plan

JBS Riverina NSW

Document Owner:

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1. Introduction

1.1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to document the processes required to prepare for and respond to pollution incidents at the JBS Riverina Abattoir and Feedlot, Regulator Road, Yanco NSW.

The purpose of this plan is to:

- Comply with the legislative requirements outlined in the POEO Act.
- Outline the procedure for timely communication of an incident to staff, relevant authorities and appropriate stakeholders
- Ensure hazards to the environment, human health and safety are eliminated and where this is not possible minimized to an acceptable level.
- Detail the controls and policies in place to ensure that this plan is effectively implemented and regularly reviewed by management and staff
- Satisfy the requirements for publishing the PIRMP on the company website

1.2. Scope

This PIRMP applies to all JBS employees, contractors and visitors located at the JBS Riverina Abattoir and Feedlot, Regulator Road, Yanco NSW.

This document will act as a standalone document but will also be incorporated into JBS's Emergency Response Plan that has been developed in accordance with Australian Standard AS3745.

The Emergency Response Plan provides comprehensive details of emergency management procedures to be followed during an emergency event.

The JBS Riverina facility operates under the following Emergency Plans:

- Riverina Beef Abattoir Emergency Plan (WHS Form 11 01, last reviewed October 2019),
- Ammonia Emergency Response Manual (last updated November 2019); and
- Riverina Beef Feedlot Emergency Plan (last reviewed 02.09.2019)

The license details which this PIRMP apply to are provided in the table below:



TABLE 1: RIVERINA EPL

Environment Protection L	icence Summary	
Licence (EPL) Number:	3547	
Licensee's Name:	JBS Australia Pty Limited	
Premises Address:	Regulator Road, Yanco, NSW 2703	
Scheduled Activities:	Agricultural Processing Livestock Intensive Activities Livestock Processing Activities	
Fee Based Activities:	Cattle, sheep or horse accommodation General agricultural processing annual Slaughtering or processing animals capacity	Scale: > 2500 T accommodation > 100000-250000 T > 30000 T annual processing

All environmental risks and environmental incidents will be managed through the implementation of this Plan. The PIRMP also details the pre-emptive actions that have been implemented at the site, these include:

- Specific measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire;
- inventory of potential pollutants on site;
- minimum safety equipment requirements;
- · communication with the community;
- minimising harm to persons;
- · training of personnel; and
- testing of the PRIMP

1.3. Aims and Objectives

The PIRMP has been prepared to provide a system and resources to deal with emergency situations to protect people, property and the environment.

The objectives of the plan are to:

- maintain a high level of preparedness;
- to respond quickly and efficiently to limit the impacts of an emergency;
- to manage an emergency until the emergency services arrive and take control;
- to support emergency services with information, knowledge, skills and equipment;
- to protect emergency responders, personnel and the community from harm;
- Ensure correct regulatory notifications are satisfactorily completed in the event of potential or actual environmental harm.
- This version of the plan is to satisfy the requirement for publishing the PIRMP on the company website.





Dangerous Goods	Substances that may be corrosive, flammable, explosive, spontaneously combustible, toxic, oxidising or water reactive. If not controlled they can cause immediate injury, death and/or damage.
Emergency Controller (s)	The emergency controller is responsible for any incident from the time it occurs until the senior officer in charge of the emergency services arrives and assumes control of the situation. Control of the situation will be given back to the emergency controller only by the authority of the senior officer in charge of emergency services.
Emergency Response	Actions taken by personnel outside of the immediate work area to address an environmental incident.
Emergency	A non-routine incident or activity that could have serious effects on the environment, property or the health or safety of employees, contract employees, customers or the community. It may be caused on the site or by an external factor (e.g. weather) and may also occur as a knock on effect from an off-site occurrence which has impacts within the facility boundaries.
External Emergency	An emergency where the impacts are expected both within the facility and beyond the boundary of the facility. Emergency services will be required.
Hazardous Substance	Substances that may have the potential to harm human health. These substances may be solids, liquids or gases (they may be pure substances or mixtures). When used, opened, consumed or spilt, these substances can generate vapours, fumes, dusts and mists.
Material Safety Data Sheets (MSDS)	A document that is supplied by the manufacturer and/or supplier of substances that describes the chemical composition and provides vital information on how persons should use these substances safely and in accordance with their designated use. All chemicals held on site must have an MSDS.





JBS Riverina is a beef processing facility with a cattle feedlot with a maximum holding capacity of 53,333 cattle at any one time. The abattoir and feedlot is located on Lot 359 DP751694, approximately 8 km from the town of Yanco, NSW (Refer Hazard and

Pollution Identification

).

Activities at the JBS Riverina site include:

Cattle Feedlot

- Cattle induction yards/holding pens for receiving & dispatching cattle via road transport
- Cattle Feedlotting
- Cattle feed mix preparations including feed batching, milling and delivery
- · Cattle welfare activities including downer management
- Pen maintenance, manure removal and composting activities
- Clay quarry extraction
- Crop generation, harvesting and silage storage
- Manure composting

Abattoir and Processing Plant

- Cattle holding pens prior to slaughter
- Beef slaughter and processing
- By-products plant Rendering
- Pre-treatment of hides
- Refrigeration, chilling and freezing activities
- Product dispatch
- Steam and power generation services including natural gas fired boilers and cogeneration plant
- Wastewater treatment system, which consists of primary, and secondary levels of wastewater treatment.
- Administration, amenities and canteen









2. Hazard and Pollution Identification

2.1. Potential Pollutant Inventory

A master Safety Data Sheet (SDS) spreadsheet contains an inventory of potential pollutants that are stored on the premises at Riverina. This inventory includes details of potential pollutants, the maximum quantity that is likely to be stored and whether the substances have the potential to be associated with a material pollution incident.

The following table identifies the primary potential pollutants and maximum quantity which may be stored on site at any time. The storage locations are detailed within - Appendix A.

TABLE 2: POTENTIAL POLLUTANT INVENTORY

Potential Pollutant	Maximum Storage Quantity
Chlorine Gas	14 Cylinders
Sulphuric Acid	8,500 LT
Liquid CO2	11 tonnes
Ammonia	33 tonnes
Diesel	41,000 LT
Unleaded petrol	6,000 LT
Lube oil	8,000 LT
Waste oil	2,000 LT
Wastewater	Capacity of waste water system: Anaerobic pond 37ML 3 Aerobic ponds 7.8 ML ea
Solid Wastes	Maximum storage of 30ha within controlled drainage area
Pesticides and Herbicides	Average approx. 100 L
Veterinary chemicals	Average approx. 500 L

Environmental site inspections are completed on a regular basis as per the requirements set out in the sites EMP and CEMS. These inspections include an assessment of environmental controls (i.e. bunding, spill kits, etc) associated with chemical and other potential pollutant storage locations. If corrective actions are required, they are entered into a maintenance program for tracking and completion.



Hazard Identification and Assessment 2.2.

The JBS corporate EMS includes a standardised risk assessment process. This risk assessment process is illustrated in Error! Reference source not found. below and uses the Environmental Significance and Risk Assessment Tool to assign a significance score for each potential impact and then determine the level of risk.

A risk assessment of the potential environmental and health impacts associated with the Riverina Plant has been undertaken using the JBS risk assessment process. The outcomes of this risk assessment are detailed within Error! Reference source not found, below.

FIGURE 2: JBS RISK ASSESSMENT PROCESS

Applicable	e to the e	ENVIRONMENTAL valuation of Significant Env	parenter contact	CE & RISK ASSESSMENT T		pplicable only to Risk Level evalu
Significance Score	x	Control Rating	x	Probability	=	Risk Rating
Risk Rating:						
Scale	X	Severity	x	Sensitivity	=	Significance Score
Environmental Significa	nce Rat	ing				

	Applicable to the evalua	tion of Significant Environment	al Impacts	Applicable only to I	Risk Level evaluation
RATING:	SCALE: (Volume of discharge or usage/ Cost)	SEVERITY:	SENSITIVITY:	CONTROL RATING:	PROBABILITY: (With existing Controls in place)
1	Insignificant	No detectable change to the environment, internally contained	No complaints, no perceived legal / community threat	Fully Controlled	Rare/Remote – theoretically possible, has not occurred
2	Low	Reversible, internally contained requiring clean- up, short term change to the environment	Employees / neighbour / community concern / potential legal exposure	<75% Effective Controls	Unlikely – not expected, has not occurred in the past 10 years
3	Medium	Reversible change to the environment, off-site release (accidental or uncontrolled)	Community / local media attention / legal exposure (e.g. breach of license) / Non-Compliance with Kraft Policy	<50% Effective Controls	Possible - Likely – potential to occur multiple times per year
4	High	Irreversible change to the environment, uncontrolled off-site release	National media attention / legal exposure / Non- Compliance with Kraft Policy	<25% Effective Controls	Almost Certain – known to occur

to 11 Environmental Impact (EI)

12 to 64 Significant Environmental Impact (SEI)

129 to 431 Medium Risk (MR) 432 to 1024 High Risk (HR)

TABLE 3 POTENTIAL ENVIRONMENTAL AND HEALTH IMPACTS

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Water	Inadequate disposal / use of sewage, wastewater and/or residual water (contamination of local groundwater and surface water resources). Depletion of natural resources (water). Possible non-compliance with licence requirements.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	 Complete regular environmental inspections and reviews of risk assessments / registers. Regular inspections and maintenance of the stormwater drainage network. Complete groundwater and other environmental monitoring in accordance with licence requirements. Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process. Provide training to all staff on the risks associated with inappropriate disposal of effluent. Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage. Undertake regular sustainability reporting (i.e. water use) to track water usage and reduce where possible. 	Controls: 2 Probability: 2 Risk: 72 LR
Land/Soil	Inadequate disposal / use of sewage, wastewater and/or waste (contamination of soil e.g. oil spillage). Possible non-compliance with licence requirements.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	 Complete regular environmental inspections and reviews of risk assessments / registers Complete soil monitoring in accordance with licence requirements. All relevant employees to complete waste management training. Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process. 	Controls: 2 Probability: 2 Risk: 72 LR

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Hazardous Substances	Spills or leaks of chemicals resulting in emissions to air, water or soil. Breaches of EPA licence and associated legislation. Production of Hazardous waste.	Scale: 3 Severity: 3 Sensitivity: 3 Score: 27 SEI	 Establish and maintain a SDS register Complete regular environmental inspections and reviews of risk assessments / registers. All relevant staff to complete spill response training and ensure adequate clean-up of any spills. Ensure effective implementation of this PIRMP and the Emergency Response Plan Ensure spill containment devices are available and appropriately serviced at regular intervals. Ensure all hazardous substances are appropriately stored, bunded and labelled. Undertake a chemical tracking and risk assessment process for all new chemicals brought onto site. Ensure that employees only handle hazardous substances after appropriate training and assessment. 	Controls: 2 Probability: 2 Risk: 108 LR
Fire and Explosion	Fire and / or explosion caused by the ignition of flammable and explosive products stored on site.	Scale: 3 Severity: 3 Sensitivity: 3 Score: 27 SEI	 Establish and maintain a SDS register. Complete regular environmental inspections and reviews of risk assessments / registers. Ensure all hazardous substances are appropriate stored and labelled. Undertake a chemical tracking and risk assessment process for all new chemicals brought onto site. Ensure adequate firefighting equipment and training is available and provided to appropriate staff Ensure effective implementation of this PIRMP and the Emergency Response Plan 	Controls: 1 Probability: 2 Risk: 54 LR

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Biological Hazards	Production of hazardous biological waste. Environmental pollution due to spills or leaks of chemicals resulting in emissions to air, water or soil. Breaches of EPA licence and associated legislation.	Scale: 2 Severity: 2 Sensitivity: 3 Score: 12 SEI	 Develop, review and maintain a program to control the risk of blood borne diseases. Appropriate storage and disposal of biological waste products. Ensure effective implementation of this PIRMP and the Emergency Response Plan 	Controls: 2 Probability: 2 Risk: 48 LR
Air	Emissions to air including chemical emissions, airborne contaminants, dust, vehicle emissions and odour causing potential compliance issues and community complaints. Possible hazards to staff and local community if hazardous emissions to air arise.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	 Complete regular environmental inspections and reviews of risk assessments / registers. Regular maintenance and inspection of point source emission sources (i.e. boilers) in accordance with manufacturer specifications. Undertake dust suppression activities where appropriate Maintain a community compliant register and investigate dust or odour complaints (if received). Ensure hazardous waste is stored in designated facilities as per the SDS spreadsheet. Provide environmental awareness training to all appropriate staff. 	Controls: 2 Probability: 2 Risk: 72 LR
Noise exposure	Noise pollution causing nuisance to nearby sensitive receptors. Compliance issues /breach of licence.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	 Noise dampening on appropriate equipment and machinery has been undertaken to reduce noise emissions. Complete occupational health and safety noise monitoring as required. Maintain a community compliant register and investigate noise complaints (if received). Provide environmental awareness training to all appropriate staff. 	Controls: 2 Probability: 2 Risk: 48

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Security Risks	Unauthorised persons accessing the facility and causing damage to equipment or processes, leading to	Scale: 2 Severity: 2	 Provide appropriate security to prevent unauthorised persons entering site and ensure appropriate control devices (i.e. vales) and locked or secured where possible. 	Controls: 1 Probability: 1
	environmental damage.	Sensitivity: 3 Score: 12 SEI		Risk: 12 LR





Safety equipment is located at a number of locations throughout the site. This equipment is checked regularly in accordance with the Occupational Health and Safety Plan (OH&S) plan.

Spill response kits are stored in the Emergency Response Shed (Appendix A) along with confined space and emergency rescue equipment. The kits are inspected and replenished as required.

The site has a trained emergency response team and Electronic Warden Intercom System (EWIS) through the abattoir complex.

For the:

Abattoir Site, all two-way communication during an emergency is on channel 1.

Feedlot communication is via internal/mobile phones and CB radio (Channel 52 & 51).

An equipped first aid facility is located in the Abattoir and is maintained by an occupational First Aider.

The Maps located in Appendix A detail the locations of emergency & evacuation response equipment throughout the site.

2.4. Incident Response

The incident response process is outlined in **Error! Reference source not found.** and includes initial containment, clean-up, notification and investigation. In addition, incident response procedures are further detailed within the following documents:

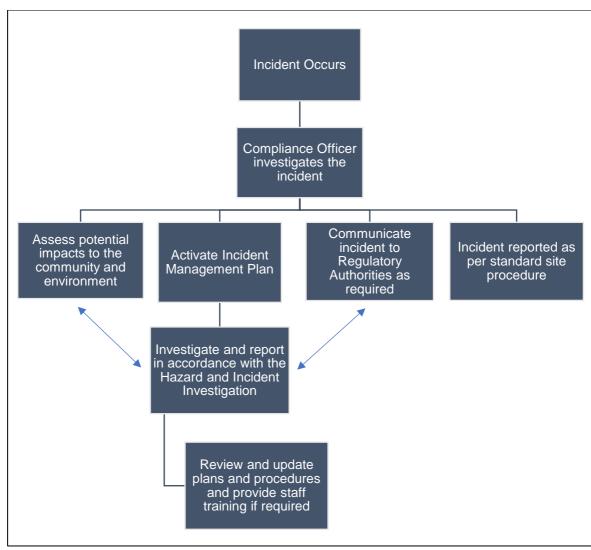
Emergency Response Plan: Provides procedures to be followed in the event of an emergency (including environmental incidents)

Spill Response Procedure: Details requirements for notification, containment and cleanup of spills (Appendix C).

Environmental Hazard / Incident Report: Is used for the reporting and investigation of environmental incidents. Includes a description of the incident, risk assessment and identification of corrective actions (Appendix B).



FIGURE 3: JBS INCIDENT RESPONSE PROTOCOL







3. Communication

3.1. Communication with Regulatory Authorities

In the unlikely event that a significant environmental incident occurs (i.e breach of EPA license) a phone call will be made to the appropriate authority by the Environmental Compliance Manager or delegate or another member of the Emergency Planning Committee as nominated by the Management Team. Contact details are provided in **Error! Reference source not found.**

TABLE 4: INCIDENT OR EMERGENCY CONTACTS

JBS Contacts	
Brett Meads - Plant Manager – Emergency Incident Manager	(02) 6951 1169
Will McCrohon - Feedlot Manager – Emergency Incident Manager Feedlot and Farm	(02) 6951 1100
Helen Ringuet – Plant WHS/ Environmental Officer	(02) 6951 1121
Sue Blackburn – Plant First Aid/HR Officer	(02) 6951 1163
William Green – Environmental Compliance Manager	(07) 3810 5482
Government Contacts	
FPA	
LIA	131 555
Leeton Shire Council	131 555 (02) 6953 0911
Leeton Shire Council	(02) 6953 0911
Leeton Shire Council SafeWork	(02) 6953 0911 131 050





3.2. Communicating with Local Residents

Community stakeholders that are potentially affected by an environmental incident at the JBS Riverina facility will be notified immediately by one of the following methods:

- Phone call by the WHS/ Environmental Officer/ Plant Manager or Feedlot Manager; or
- Door knocking by an appropriate site representative.

Any additional communication will be determined by the nature of the event or as directed by the relevant agency. Regular updates will be provided to the affected community stakeholders throughout the course of the event.

In the event of a major pollution incident, residents or businesses may be further contacted by an emergency service representative, such as in a case where evacuation or critical safety actions are necessary.

An 'all-clear' telephone call will also be made to residents when the incident is no longer of concern or normality has been restored.

Note: In the event of an emergency, the Chief Executive (or their delegate) may only make Press Statements on behalf of JBS Australia.

4. Training

Relevant staff and contractors complete an induction that includes environmental components relating to the following:

- General environmental duties under relevant legislation;
- Providing details on the sensitivity of the site and importance of adhering to environmental procedures;
- Raising awareness of environmental signage that is displayed on the site;
- Emergency numbers are to be clearly displayed; and
- Environmental procedures to be followed.

In addition, Feedlot employees will also participate in environmental awareness training as part of the Feedlot Cert III Programme and Task Technical Training Programme.

All persons who complete this training will be made aware of the contents of this plan.



5. Document Availability

In accordance with Section 153D of the POEO Act, this PIRMP will be made available to all site personnel via the site document control system. A hard copy of the plan will also be available at the Riverina site office.

In addition, this plan will be made available to the public via the following methods:

- Uploading a public version of the plan to the JBS Australia website at http://www.jbssa.com.au/
- Providing copies of the public version of the Plan, without charge, to any member of the public who may request a copy.

6. Testing of Plan

This Plan will be tested and reviewed at least once every twelve (12) months to ensure that the information contained within the plan is accurate and up to date, and that the Plan is capable of being implemented in a workable and effective manner.

The review will consist of a desktop review of the content within this PIRMP to ensure accuracy. A review of the testing of the plan (i.e. emergency exercise) will be undertaken following each exercise to determine any required modifications to this PIRMP.

TABLE 5: PIRMP TEST RECORD

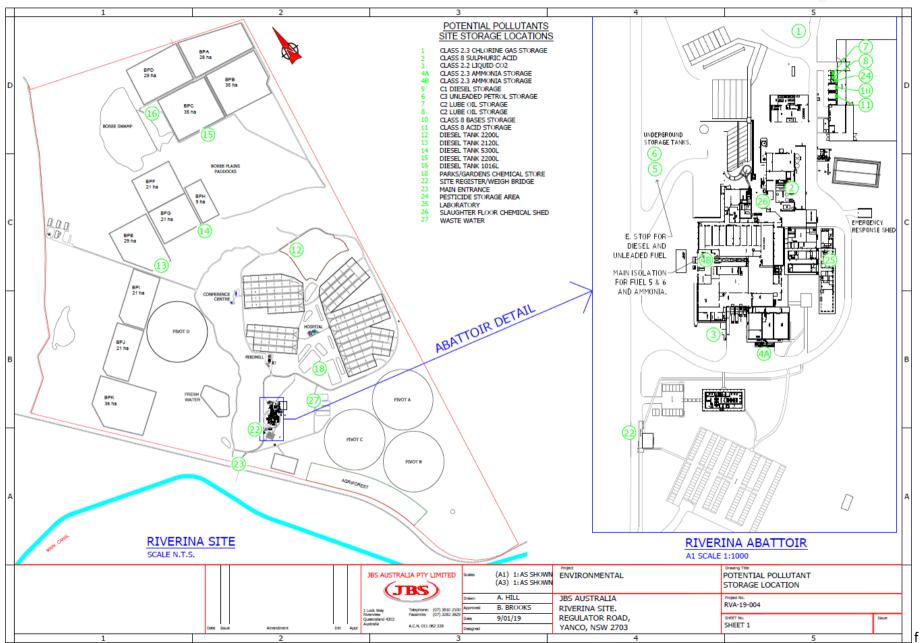
Method	Staff Members	Incident Type	Date
Desktop Revision	Will McCrohon, Kelly Ainsworth, Brett Meads, Mark Savage, Helen Ringuet	Desktop review to ensure PIRMP content is valid and can be followed in the event of an incident.	19.07.2021
Desktop Revision	Will McCrohon, Kelly Ainsworth, Brett Meads, Helen Ringuet, Ray Chirumalle, Graham Thorne and Jack Tunnicliffe.	Desktop review to ensure PIRMP content is valid and can be followed in the event of an incident.	20.01.2020
Emergency Evacuation Drill	All employees, visitors and contractors	Total Site Emergency Evacuation Drill – first shift	17.6.2019
Emergency Evacuation Drill	All employees, visitors and contractors	Total Site Emergency Evacuation Drill – second shift	04.07.2019
Emergency Evacuation Drill	All employees, visitors and contractors	Total Site Emergency Evacuation Drill – first shift	02.05.2018
Emergency Evacuation Drill	All employees, visitors and contractors	Total Site Emergency Evacuation Drill – second shift	25.05.2018
Scenario drill	Kennedy C & Daniel S suited up assisted by maintenance team members	Ammonia Response Drill – full encapsulation suit & breathing apparatus scenario drill to access the manual plate freezer ammonia valve	03.05.2018
Scenario drill	Richard S, Nathaniel S, Jack T & Peter W, assisted by 4 maintenance team members	Ammonia Response Drill – full encapsulation suit & breathing apparatus scenario drill to access roof space to gain access to chiller 25 ammonia valve	04.06.2016
Scenario drill	Bryce D, Matthew P, Nigel C, & Lee A, assisted by 4 maintenance team members	Ammonia Response Drill – full encapsulation suit & breathing apparatus	6.6.2016





scenario drill to access king valve at the ammonia accumulator

Appendix A:- Chemical Storage & Isolation Locations







Appendix B:- Environmental Hazard or Incident Investigation Report









Document Subject: Corporate Environmental Management System (CEMS) Environmental Hazard or Incident Investigation / **Regulatory Contact Report**

DOCUMENT NUMBER: CEMS_10.2_CA_F1

Report Date:				Report	Number:		
Site/Location				Area of Incident:			
Aspect & Impact R	egister Referen	ce#					
Incident date			'	Incident time:			
Type of notification				·			
Regulatory Body Notified							
Contact person details?							
Name of person/s reporting							
Nature of Incident							
What happened?							
Evaluation of Environmental Risk	Scale	Severity	Sensitivity	Significance Rating	Control	Probability	Risk Rating
(refer EV 2-1)	х	х	=	х	х	=	
Immediate corrective action/s taken							
Corrective actions to be taken							
Status of investigation:							
Further information contact:	Name:			Position	:		
	Phone:			Mobile:			
Site Manager Approval	Name:			1			
	Signature:			Date:			









JBS Spill Response Procedure

Notification

All spills need to be considered serious until verified otherwise. The factors which will determine the seriousness of the spill are the nature of the material, the location of the spill and the volume of material released. As a spill can result in WHS, Environmental or Production risk, any spill which is not consistent with NORMAL discharge is to be reported to the area supervisor.

- 1. Notify the area Supervisor immediately.
- 2. The area Supervisor must determine whether or not the Weighbridge is notified and thus the Emergency Response Team. At this point the spill will be treated as an incident.
- 3. If the spill is determined to be normal, the clean up as per normal operations or consult the MSDS or environmental / compliance officer.

For the purpose of the environment, the weighbridge should be notified if:

- Spills escape the Bunded Areas and cannot be controlled;
- When spills are discharged into effluent;
- The material cannot be disposed of to effluent;
- The material must not directly enter the effluent ponds; and
- The material may result directly or indirectly in odour.

Areas outside effluent Catchment:

- The material could contaminate soils or kill plants/trees;
- Could contaminate water courses including storm water; and
- Could contaminate ground water.

Spills should be cleaned up as instructed. However in Principle:

- Contain the spill;
- Control the discharge;
- Determine the disposition of spill and adsorbent material; and
- Clean the area thoroughly to prevent further contamination.

The incident and clean-up is performed in consultation with the Compliance Officer, Feedlot Manager and/or Corporate Environmental Team.

Environmental Spills should be recorded in CEMS_10.2_CA_F1 Environmental Hazard or Incident Investigation and Regulatory Contact Reporting and may require reporting to the EPA.