



# Pollution Incident Response Management Plan

Duxton Winery Buronga

EPL 3657 Silver City Highway Mourquong

For Notification Procedures  
See Sections 6 & 7

In the event of an emergency please contact  
Jamie Forte, Site Manager, on 0434 757 047





# Pollution Incident Response Management Plan

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# Pollution Incident Response Management Plan

## 1 WHAT IS THIS PLAN?

### 1.1 Why do we need a PIRMP?

The *Protection of the Environment Operations Act 1997*<sup>i</sup> (**POEO Act**) imposes a duty on the holder of an Environment Protection Licence issued under the POEO Act to prepare and implement a pollution incident response management plan (PIRMP) which complies with the POEO Act and its Regulations in relation to the activity to which the Licence relates.

Duxton Winery Buronga Pty Ltd (ACN 007 516 529) (formerly known as “The Stanley Wine Company Proprietary Limited”) holds Environment Protection Licence No. 3657 in relation to the activities of Agricultural Processing and Grape Processing at its premises at Silver City Highway, Mourquong, NSW 2648.

This document is the Duxton Winery Buronga PIRMP and sets out how Duxton Winery Buronga will report and manage pollution incidents which occur at the Mourquong Site.

### 1.2 What needs to be in a PIRMP?

The specific requirements for PIRMPs are set out in the POEO Act<sup>ii</sup> and the *Protection of the Environment Operations (General) Regulations 2021*<sup>iii</sup> (**POEO (G) Regulation**).

Specific detail is required for inclusion in the PIRMP. Section 9.2 of this plan headed “PIRMP Compliance with Legislation”, sets out a chart of the legislative requirements and where each is addressed in this plan.

It is important to note that Duxton Winery Buronga:

- Is required to have a plan in place and to implement it if a “pollution incident” is caused or threatened<sup>iv</sup>;
- must keep the plan readily available at the premises to which the EPL relates<sup>v</sup>;
- must test the plan at least once every 12 months and after a pollution incident has occurred at the Mourquong Site<sup>vi</sup>; and
- must immediately act under this plan if a “pollution incident” occurs that causes or threatens material harm to the environment.

This document details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. The notification of environmental incidents under this PIRMP is only required for those incidents causing, or threatening to result in, material environmental harm.<sup>vii</sup>

### 1.3 Questions about this Plan





# Pollution Incident Response Management Plan

If you have questions about this plan, or suggested revisions, please contact Jamie Forte, Site Manager on 0434 757 047.

## 2 PIRMP SITE DETAILS

### 2.1 Premises Covered by this PIRMP

This PIRMP applies to the Duxton Winery Buronga premises, operating under EPL 3657, at 514 Silver City Highway, Mourquong NSW 2739

### 2.2 Location of Site

#### a) Where is it?

The site is located approximately 8 kilometres North-East of Mildura in South-Western New South Wales (NSW).

#### b) Why do we need an EPL?

The need for the EPL arises from the fact that the site crushes more than 30,000 tonnes of grapes annually and those processes generate an average of 85 ML wastewater.

All wastewater and stormwater enters the site's wastewater system. The wastewater system serving the winery commences with the flow being passed through a spirac screen for coarse solids separation followed by a large set of wedges for settlement of the finer solids.

The discharge from the wedges then passes to a woodlot area after pH adjustment. This is the final destination for the site to dispose and reuse water. A monitoring program is in place in-line with the EPL requirements.

#### c) What are our closest sensitive receptors?

The closest sensitive receptor is the Murray River which is located approximately 1-kilometre south-west from the site.

The depth to groundwater around the site is more than 30 m deep.

### 2.3 Surrounding Area

The surrounding area, which may potentially be impacted by a pollution incident occurring at the site, includes the following:

- Landholders adjacent to the property;
- Australian Premium Dried Fruits
- Ash Lanyon (Neighbour)
- Russell Hammet (Neighbour)
- Orange World.





## Pollution Incident Response Management Plan

### 2.4 Plan Showing Location

Set out below are two plans.

The first shows the location of the site and the surrounding area that could potentially be impacted by a pollution incident occurring on the site.

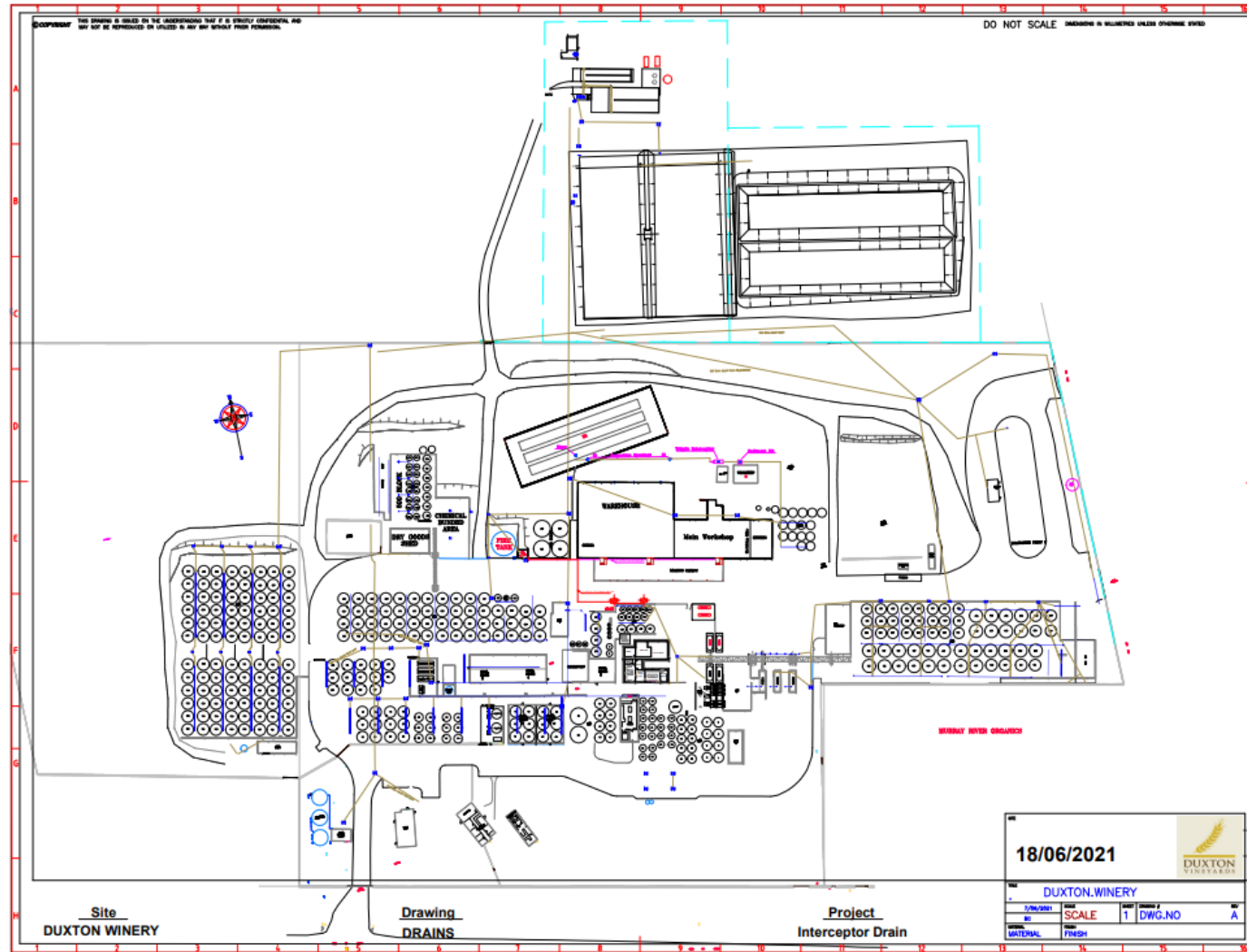
The second is a more detailed site plan which shows the location of potential pollutants on the site and the stormwater drains.







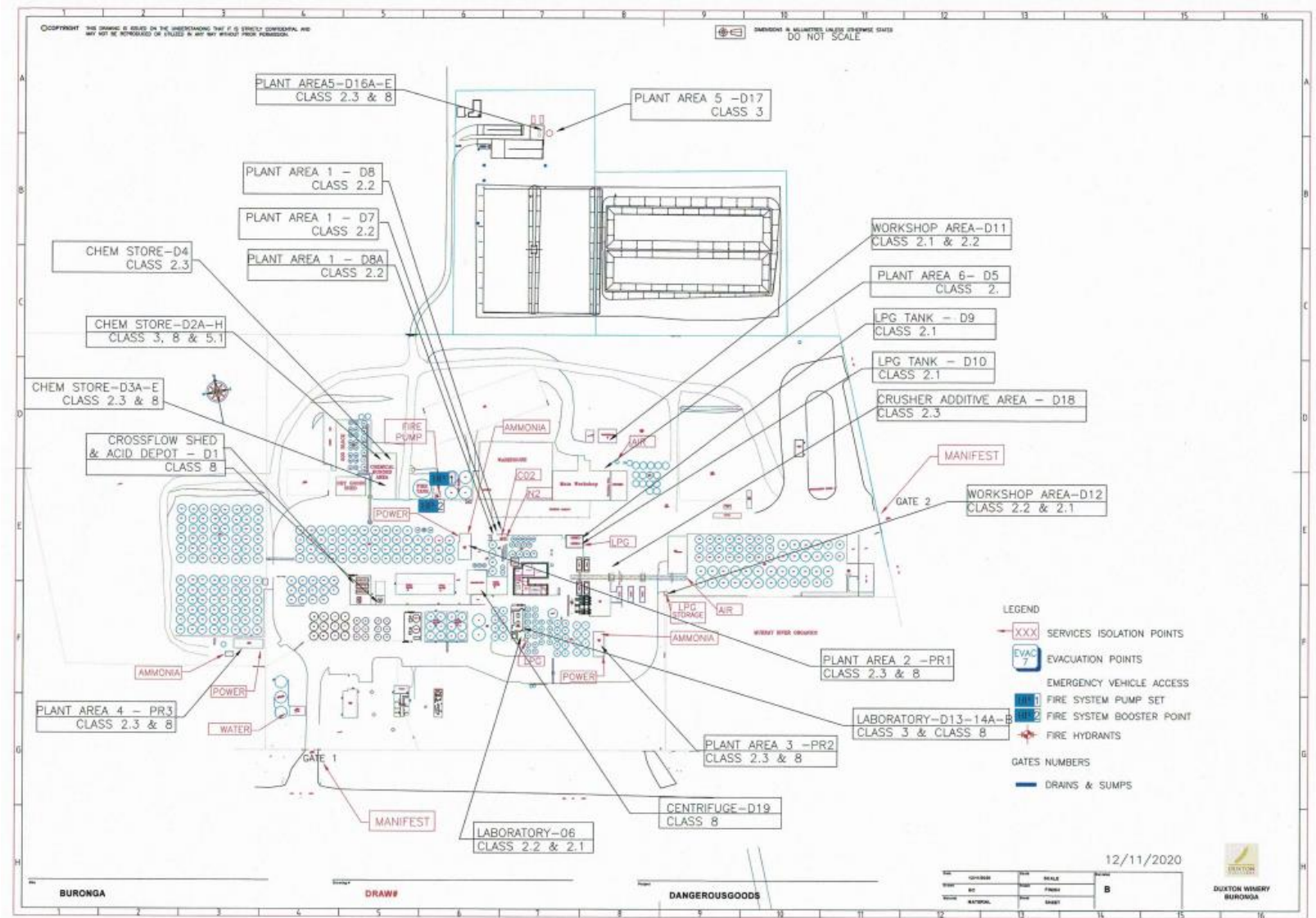
# Pollution Incident Response Management Plan







# Pollution Incident Response Management Plan







# Pollution Incident Response Management Plan

## 3 RESPONSIBILITIES UNDER THIS PIRMP

### 3.1 Who has responsibilities under this PIRMP?

The people with specific responsibilities associated with the management and implementation of this PIRMP are set out in the table below.

NAME	CONTACT DETAILS	POSITION	RESPONSIBILITY
Jamie Forte	Mobile: 0434757047	Site Manager	<ul style="list-style-type: none"> <li>Responsible for authorising the PIRMP and all subsequent updates</li> <li>Responsible for ensuring adequate resourcing for implementation of the PIRMP</li> <li>Responsible for communicating PIRMP to site personnel</li> </ul>
Bailey Surgey	Mobile: 0427009961	Environmental Manager	<ul style="list-style-type: none"> <li>Responsible for undertaking notification as defined in this PIRMP Responsible for managing the response to a pollution incident</li> <li>Responsible for arranging testing and updating of the PIRMP Responsible for ensuring notification and training of PIRMP</li> <li>Responsible for coordinating communications with affected community members</li> </ul>
Wayne Ellis	Mobile: 0407369586	General Manager	<ul style="list-style-type: none"> <li>Responsible for undertaking notification as defined in this PIRMP.</li> <li>Responsible for coordinating the response to a pollution incident.</li> <li>Ensure site personnel are aware of this PIRMP</li> </ul>
Duxton Capital Legal	Phone: (08) 8130 9500	Head of Legal, Governance and Reporting	<ul style="list-style-type: none"> <li>Responsible for notifying agencies if material harm is caused or threatened.</li> </ul>





# Pollution Incident Response Management Plan

## 3.2 Where is the PIRMP kept?

This PIRMP must be:

- a) kept in written form at the site;
- b) made available to all personnel responsible for implementing the plan (see table above in Section 3.1);
- c) made available to an authorised officer on request, including an EPA officer; and
- d) posted on the Duxton Vineyards website, in a prominent position and on a publicly available page, within 14 days of it being finalised.

Please note that no personal information<sup>viii</sup> will be made publicly available as part of the PIRMP.

## 4 PRE-PLANNING FOR ENVIRONMENTAL INCIDENTS

### 4.1 Our Major Site Health & Environmental Hazards

A crucial part of the PIRMP process is to ensure pre-planning around the management of potential environmental incidents.

To that end, Duxton Winery Buronga has a site-based Environmental Committee ('Committee'). The purpose of that committee is to identify the significant environmental risks and community impacts, to assess the risk they pose and to develop the controls necessary to effectively manage them in accordance with the established hierarchy of controls for environmental management.

The Committee has examined the likelihood of hazards occurring at the site with the potential to cause material harm to the environment. We have also assessed the likelihood of such hazards occurring (including conditions or events that could or would increase the likelihood of those hazards occurring).





## Pollution Incident Response Management Plan

POTENTIAL INCIDENT	ENVIRONMENTAL HAZARDS	POTENTIAL HEALTH HAZARDS	LIKELIHOOD OF OCCURRENCE	CONDITIONS THAT COULD INCREASE THAT LIKELIHOOD	PRE-EMPTIVE ACTION WE WILL TAKE TO MINIMISE OR PREVENT THAT RISK
Dangerous goods spills and fire resulting in a release of hazardous materials from the Site	Air pollution Soil or groundwater contamination	Illness from inhaling thick smoke	Low	Failure to maintain control measures	<ul style="list-style-type: none"> <li>▪ Appropriate bunding, spill kits and fire extinguishers are provided around the site</li> <li>▪ Staff are trained in chemical handling and spill management</li> </ul>
Hazardous materials causing a release of fibres, odours or emissions	Environmental nuisance - odour Air pollution	Illness due to exposure to high level of fibres release	Low	Failure to maintain control measures	<ul style="list-style-type: none"> <li>▪ Asbestos Management Plan.</li> <li>▪ Asbestos register.</li> <li>▪ Regular service of Ammonia Plant</li> <li>▪ Ammonia detection equipment available in Plant Room for ongoing monitoring</li> <li>▪ Procedures in place for handling ammonia</li> <li>▪ Pressure vessels are inspected and</li> </ul>





## Pollution Incident Response Management Plan

POTENTIAL INCIDENT	ENVIRONMENTAL HAZARDS	POTENTIAL HEALTH HAZARDS	LIKELIHOOD OF OCCURRENCE	CONDITIONS THAT COULD INCREASE THAT LIKELIHOOD	PRE-EMPTIVE ACTION WE WILL TAKE TO MINIMISE OR PREVENT THAT RISK
					served as per schedule
Environmental contamination of soil or groundwater with the potential to leave the site in stormwater, surface waters or through groundwater migration	Soil or groundwater contamination	Illness causing from consuming fresh produce from contaminated soil or groundwater	Low	Failure to maintain control measures	<ul style="list-style-type: none"> <li>▪ Ongoing soil and groundwater monitoring in compliance with EPA licence conditions</li> <li>▪ Contingency dam for capturing any contaminated or out-of-spec wastewater</li> </ul>
Ventilation system contamination	NIL	Outbreaks of Legionnaires' disease	Low	Failure to maintain control measures	<ul style="list-style-type: none"> <li>▪ Maintain registration with the local council</li> <li>▪ Complete cooling tower water treatment program monthly</li> <li>▪ Complete legionella testing of cooling tower every 2 months</li> <li>▪ Cooling towers are cleaned as per AS3666</li> </ul>



POTENTIAL INCIDENT	ENVIRONMENTAL HAZARDS	POTENTIAL HEALTH HAZARDS	LIKELIHOOD OF OCCURRENCE	CONDITIONS THAT COULD INCREASE THAT LIKELIHOOD	PRE-EMPTIVE ACTION WE WILL TAKE TO MINIMISE OR PREVENT THAT RISK
					<p>requirements every 4 months</p> <ul style="list-style-type: none"> <li>▪ No positive legionella tests in the last 7 years</li> <li>▪ Consistent conformance over the last 7 years</li> <li>▪ Evaporative systems are cleaned twice a year</li> </ul>

## 4.2 Our Inventory of Potential Pollutants

Set out below are the list of chemicals and other potential pollutants used on the site. Remember that even inert substances such as milk can cause pollution, so think broadly about the list of potential pollutants.





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The SDS for the listed chemicals are available on ChemAlert.

Summary Information - Classes of Dangerous Goods		
Class	Packing Group	Maximum Quantity
2	N/A	55 kL
2.1	N/A	16 kL
2.2	N/A	30 kL
2.3	N/A	3 kL
3	II / III	1.25 kL
5.1	N/A	1.1 T
8	II	45.7 kL
C1	N/A	1.25 kL

## LEGEND

S = Storage

P= Process

kgs = kilograms

kL= Kilolitres

T= Tonnes

Its = Litres

Sub Risk= subsidiary Risk

Dangerous Goods Depot Types	
IBC	Intermediate bulk container
CIP	Cylinders in process
GTD	Tank situated normally at ground level
PDA	Depot in the open air for package stores





## Pollution Incident Response Management Plan

PP	Process plant
PDB	Depot within a building, for package stores

Depot Name / Number:		ACID DEPOT & CFF		D1		(Winery Process)	
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type	
Sodium Hydroxide (Liquid)	1824	8	N/A	II	2 x 1 kL	IBC	
Hydrogen Peroxide+Peroxyacetic Mix	3149	5.1	N/A	II	100 kgs	PDA	

Depot Name / Number:		CHEMICAL STORE		D2A-H		(Winery Process)	
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type	
Sodium Hydroxide (Liquid)	1824	8	N/A	II	3 x 1 kL	IBC	
Sodium Hydroxide (Solid)	1823	8	N/A	II	2.5 T	PDA	
Hypochlorite Solution	1791	8	N/A	III	1 x 1 kL	IBC	
Ethanol	1170	3	N/A	N/A	1 x 1 kL	PDB	
Hydrogen Peroxide+Peroxyacetic Mix	3149	5.1	N/A	II	2 T	PDA	

Depot Name / Number:		Chemical Store		D3A-E		(Effluent Processing)	
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type	
Anhydrous Ammonia (NH8)	1005	8	8	N/A	5 x 1.15 kL	GTD	

Depot Name / Number:		Chemical Store		D4		(Winery Process)	
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Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Sulphur Dioxide (SO <sub>2</sub> )	1079	2.3	8	N/A	4 x 600 lts	GTD

Depot Name / Number: LABORATORY D6 (Cylinders in use)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Nitrogen Compressed	1066	2.2	N/A	N/A	150 lts	CIP
Air Compressed	1002	2.2	N/A	N/A	100 lts	CIP
Acetylene	1001	2.1	N/A	N/A	100 lts	CIP
Liquid Petroleum Gas (LPG)	1075	2.1		N/A	2 x45 kgs	CIP

Depot Name / Number: PLANT AREA 5 D8 (Winery Process)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Carbon Dioxide Refrigerated Liquid (CO <sub>2</sub> )	2187	2.2	N/A	N/A	7.0 kL	CIP
Nitrogen Compressed (liquid) tank & receiver (N <sub>2</sub> )	1977	2.2	N/A	N/A	15 kL	CIP
Nitrogen Compressed (gaseous)	1066	2.2	N/A	N/A	15 kL	CIP

Depot Name / Number: LPG GAS TANKS D9 (Winery Process)						
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# Pollution Incident Response Management Plan

Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Liquid Petroleum Gas Bullets (LPG)	1075	2.1		N/A	1 x 7.5 kL	CIP

Depot Name / Number: LPG GAS TANKS D10 (Winery Process)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Liquid Petroleum Gas Bullets (LPG)	1075	2.1		N/A	1 x 7.5 kL	CIP

Depot Name / Number: WORKSHOP 2 AREA D11 (Gas Cage/Workshop)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Acetylene Bottle	1001	2.1		N/A	4 x 50 lts	PDA
Carbon Dioxide (refrigerated)	2187	2.2		N/A	2 x 50 lts	PDA
Carbon Dioxide	1013	2.2		N/A	2 x 50 lts	PDA
Argon Bottle	1006	2.2		N/A	8 x 50lts & 4 x 15lts	PDA
Arcol	1956	2.2		N/A	2 x 50lts	PDA
Oxygen Compressed	1072	2.2	5.1	N/A	4 x 50lts	PDA
Nitrogen	1066	2.2		N/A	3 x 50lts	PDA

Depot Name / Number: PLANT AREA 5 D12 (Winery Services)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Air Compressed - Receiver	1002	2		N/A	50 kL	CIP





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Liquid Petroleum Gas Bullets (LPG)	1075	2.1		N/A	2 x 210 kgs & 11 x 15 kgs	PDA
Depot Name / Number: LABORATORY D13 (Chemical Storage Cabinets)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Ethanol	1170	3	N/A	N/A	250 lts	PDB

Depot Name / Number: LABORATORY D14A (Chemical Storage Cabinets)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Acetic Acid	2789	8	N/A	II	5 lts	PDB
Hydrochloric Acid	1789	8	N/A	II	5 lts	PDB
Phosphoric Acid	1805	8	N/A	III	40 lts	PDB
Sulfuric Acid	1830	8	N/A	II	2.5 lts	PDB

Depot Name / Number: LABORATORY D14B (Chemical Storage Cabinets)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Quantity	Depot Type
Sodium Hydroxide	1824	8	N/A	III	40 lts	PDB

Depot Name / Number: PLANT AREA 5 D16A-E (Winery Services)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Anhydrous Ammonia	1005	8	N/A	N/A	5 x 1.15 kL	GTD





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Depot Name / Number: PLANT AREA 5 D17 (Winery Services)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Diesel (Combustible Liquid)	1202	C1	N/A	N/A	1.25 kL	GTD

Depot Name / Number: CRUSHER AREA D18 (Winery Services)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Sulphur Dioxide (SO2)	1079	2.3	8	N/A	1 x 600 lts	GTD

Depot Name / Number: CENTRIFUGE AREA D19 (Winery Services)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	QTY	Depot Type
Sodium Hydroxide (Liquid)	1824	8	N/A	II	1 x 1 kL	IBC

Depot Name / Number: PLANT AREA 1 PR1 (Refrigeration Plant)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Qty	Depot Type
Anhydrous Ammonia	1005	8	8	N/A	1.5 kL	PP

Depot Name / Number: PLANT AREA 2 PR2 (Refrigeration Plant)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Qty	Depot Type
Anhydrous Ammonia	1005	8	8	N/A	2 kL	PP





# Pollution Incident Response Management Plan

Depot Name / Number: PLANT AREA 3 PR3 (Refrigeration Plant)						
Correct Shipping Name	UN No.	Class	Sub-Risk	P.G	Qty	Depot Type
Anhydrous Ammonia	1005	8	8	N/A	3.2 kL	PP





# Pollution Incident Response Management Plan

## 5 PRE-PLANNING FOR POLLUTION INCIDENTS

### 5.1 Preparing our Incident Response Infrastructure and Equipment

A crucial part of pre-planning for pollution incidents, which may arise on site, relates to having the necessary infrastructure and equipment.

That equipment should be focused around minimising the risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident.

In the event of an environmental spill, the management documentation and response equipment shall include, but not be limited to:

- Emergency Response Manual;
- Environmental hazard register;
- SDS (available on ChemAlert);
- Drain plugging materials;
- Plan of drainage system (part of Site Emergency Plan);
- Protective Aprons;
- If required, SCBA hooker line system or respirator;
- Key neutralizing equipment;
- Foam extinguisher;
- List of key personnel;
- Response requirements for vacuum truck;
- Spill response over drums; and
- Location of decontamination safety showers.

### 5.2 Staff & Contractor Induction

All Duxton Winery Buronga employees and contractors must be made aware of their roles and responsibilities in the case of incidents during their induction.

### 5.3 Training

In addition, regular training and instruction regarding this PIRMP must be conducted in accordance with legislative requirements.

All training records, including the name of the person undertaking training and the date of training, shall be maintained in compliance with legal requirements.

### 5.4 Testing, Review and Maintenance





# Pollution Incident Response Management Plan

Incident management will be included in the testing of our emergency response procedure, which occurs annually.

The testing of this PIRMP will be undertaken to check that the information is accurate and current, and that the plan is capable of being implemented in a workable and effective manner.

Testing shall be undertaken in the following ways:

- First, the PIRMP will be tested by assessing and reviewing it and making any necessary changes, as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training requirements;
- Secondly, a review of the PIRMP will occur every 12 months commencing from the date of authorisation by the Site Manager. Contact details in this document must be kept current at all times; and
- Thirdly, the PIRMP will be reviewed within one month from the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to ensure that the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

## 5.5 Review Register

Records must be kept in accordance with legal requirements and will be included in the Review Register (see below) for this plan.

Information to be retained in relation to the PIRMP testing includes the:

- manner in which the test was undertaken;
- dates when the plan has been tested;
- person who carried out the testing; and
- Date and description of any update of, or amendment to, the plan.



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DATE OF TEST	NAME OF PERSONNEL UNDERTAKING TEST	MANNER OF TESTING	SUMMARY OF CHANGES (INCLUDE BRIEF DETAIL AND SECTION NUMBER)	DATE OF UPDATE
11/11/2019	Leonie Stanborough	Desktop Audit -Document Review	Updated contact details neighbours and responsible persons. Business was taken over on 30/9/19. Details updated to reflect these business changes	11/11/2019
24/1/2020	Paul Gordon Leonie Stanborough	Fire Drill Evacuation	Chemical Compound SO2 bottle ruptured.	10/11/2020
29/9/2020	Leonie Stanborough Brodie Lawn	Desktop Audit -Document Review	Updated contact details neighbours and responsible persons. Updated formatting & amendments as advised by Piper Alderman. Updated chemical manifest. Inclusion of a site asbestos management plan & register after a comprehensive site assessment identified low grade asbestos onsite.	10/11/2020
2/11/2020	Piper Alderman Cathy Oster James Moriarty	Document Review	Updated currency of legislation & inclusion of Head of Legal, inclusion of Annexures & references	2/11/2020
21/01/2021	Paul Gordon Leonie Stanborough	Fire Drill Evacuation	Evacuation Drill for ERM & PIRMP compliance Scenario : LPG Gas Cylinder fire near MRO & 600 block	4/11/2021





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1/09/2021	Paul Gordon Leonie Stanborough	Fire Drill Evacuation	Evacuation Drill - Ammonia leak in chemical compound - diverted to Evac 1 Link Rd due to wind direction	4/11/2021
4/11/2021	Leonie Stanborough Dylan Klingbiel	Desktop Audit - Document Review	Updated contacts -internal & external. Updated DG & drains map. Updated chemical manifest. Contacted neighbours.	3-19/11/2021
19/11/2021	Piper Alderman	Document Review	Updated currency of legislation and regulations	19/11/2021
1/12/2022	Jamie Forte Dylan Klingbiel	Document review	Updated contacts and responsibilities table Removed bulk sulphuric acid storage	1/12/2022
7/12/2023	Levi Jones	Document review	Updated contact information	7/12/2023





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## 6 WHEN IS NOTIFICATION REQUIRED?

Not every environmental incident needs to be notified to the EPA.

Notification is required where there is a:

- pollution incident (of water, air or land) that causes or threatens to cause 'material harm' to the environment (subject to some exceptions); or
- Breach of a licence condition.

'Material harm' is defined under the POEO Act. In order to be satisfied, required tests must be met.

'Material harm' includes harm that is not trivial and where the rectification costs exceed \$10,000.

If you are uncertain as to when notification is required and whether there is in fact a 'material harm', refer to and quickly work through **Annexure 1**.

## 7 NOTIFICATION PROTOCOLS

### 7.1 If a Notifiable Pollution Incident Occurs Who Must Notify?

All Duxton Winery Buronga employees and contractors working at the premises are responsible for alerting management personnel to all environmental incidents or hazards, which may result in a material environmental incident, regardless of its nature or scale.

Notification responsibilities are detailed in the POEO Act<sup>ix</sup>, which encompasses all site personnel, including contractors and sub-contractors. These can be categorised broadly as:

- the duty of an employee or any person undertaking an activity:
  - Any person engaged as an employee or undertaking an activity (at the premises) must, immediately after becoming aware of any potential incident, notify their relevant manager or employer of the incident and all relevant information about it. This is to be undertaken as per Section 7.3; and
- the duty of the employer or occupier of a premises to notify:
  - An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake notification to the appropriate regulatory authority of any "material harm incidents", including relevant information. Notification shall be undertaken as per Section 7.3.

### 7.2 Who do you need to notify?

#### a) Internal Notification

As discussed in Section 7.1, internal notification of an environmental incident is the responsibility of all site and contractor personnel. In the instance of identification of an environmental incident or hazard, the personnel will report the issue immediately to their





# Pollution Incident Response Management Plan

manager.

'Immediately' is taken to mean 'promptly and without delay'.

## b) External Notification

The Head of Legal, Governance and Reporting must notify the agencies (as applicable) listed in the table below, in that order, of the occurrence and details of a material harm incident immediately.

Pursuant to the guidance provided by the EPA, the decision on whether to report the incident<sup>x</sup> should not delay immediate actions to ensure the safety of people or contain the pollution incident. However, incident notification will be made as soon as it is safe to do so.

AGENCY	CONTACT DETAILS
Fire and Rescue	000 (To be contacted first in this order if the incident presents an immediate threat to human health or property and emergency services are required, or last in this order if emergency response is not required.)
EPA	131 555
Ministry of Health	(02) 9391 9000
Work Cover	13 10 50
Wentworth Shire	(03) 5027 5027 (office hours) Directed to Marshall security after hours

## c) Notification to Local Landholders and Community

(see Section 8.3)

## 7.3 Reporting an Environmental Incident Flowchart

Below is a detailed graphical representation of the above requirements.

A level 1 incident involves the situation where there is a (see, also, Section 6 above):

- pollution incident (of water, air or land) that causes or threatens to cause material harm to the environment (subject to some exceptions); or
- Breach of a licence condition.

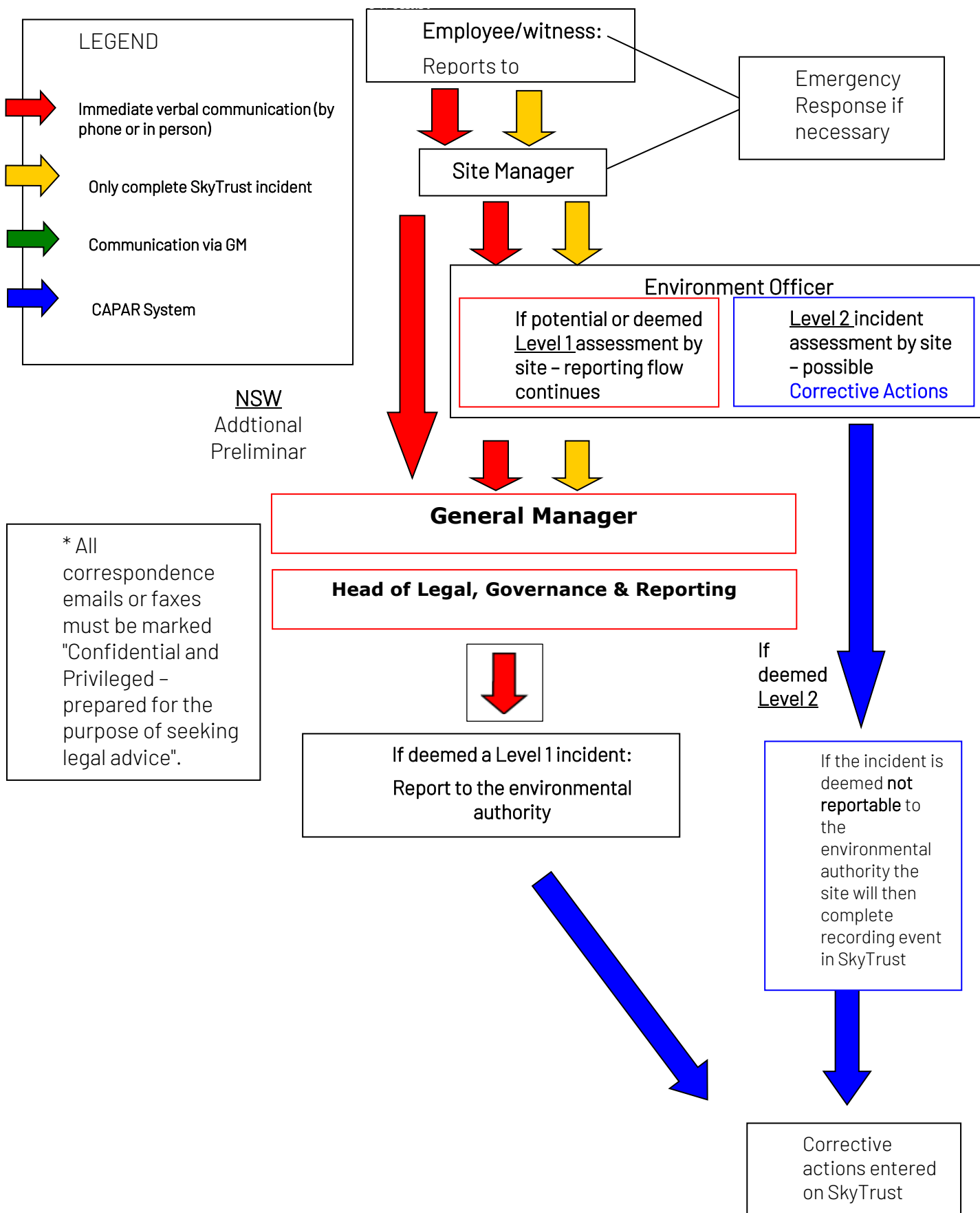
A level 2 incident involves the situation where there is:

- no pollution incident (of water, air or land) that causes or threatens to cause material harm to the environment (subject to some exceptions); and
- no breach of a licence condition.





# Pollution Incident Response Management Plan







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## 8 ACTIONS FOLLOWING NOTIFICATION

### 8.1 What actions do you take on Site?

In accordance with Incident Management, the following actions are to be implemented at the site following a material harm incident:

- First, alert the specific supervisor/ Site Manager;
- Attempt to control spill when it is safe to do so, report to Chief Warden, if possible, assist spill team;
- Site Manager to notify General Manager and Head of Legal, Governance and Reporting;
- General Manager/Head of Legal, Governance and Reporting to notify the relevant authorities (where considered necessary);
- Chief Warden – liaison functions to police, EPA, and Ambulance;
- Arrange all management interaction with authorities, and community where necessary;
- Media responses, with consent of the General Manager;
- Situation controlled – Chief Warden organizes a debrief with all key personnel;
- Incident assessment – assessment on required in-house controls;
- Medical intervention – assessment of employee/community medical exposure, including the need for follow-up treatment; and
- Follow Environmental Incident Reporting protocols.

Incident management at the site should focus on actions to:

- secure and assign the necessary tactical response resources, which are documented in the Duxton Winery Buronga Emergency Response Manual, including equipment and/or personnel to minimise the environmental impacts associated with the incident;
- establish that tactical response operations are carried out in a safe, well-organised, legal, and effective fashion;
- provide for the safety and welfare of all responders, employees, contractors, and visitors;
- continuously assess the incident to determine the adequacy of tactical response operations and the need for assistance from any external organizations;
- manage stakeholders arriving at site;
- minimise effects on people, the environment, property, production, and company reputation; and
- implement an environmental monitoring program to quantify impacts as a result of the incident as well as to be used as the basis to notify adjacent landholders and downstream water users as to whether avoidance or remediation measures are required; and

### 8.2 Specific Hazard Response Procedures

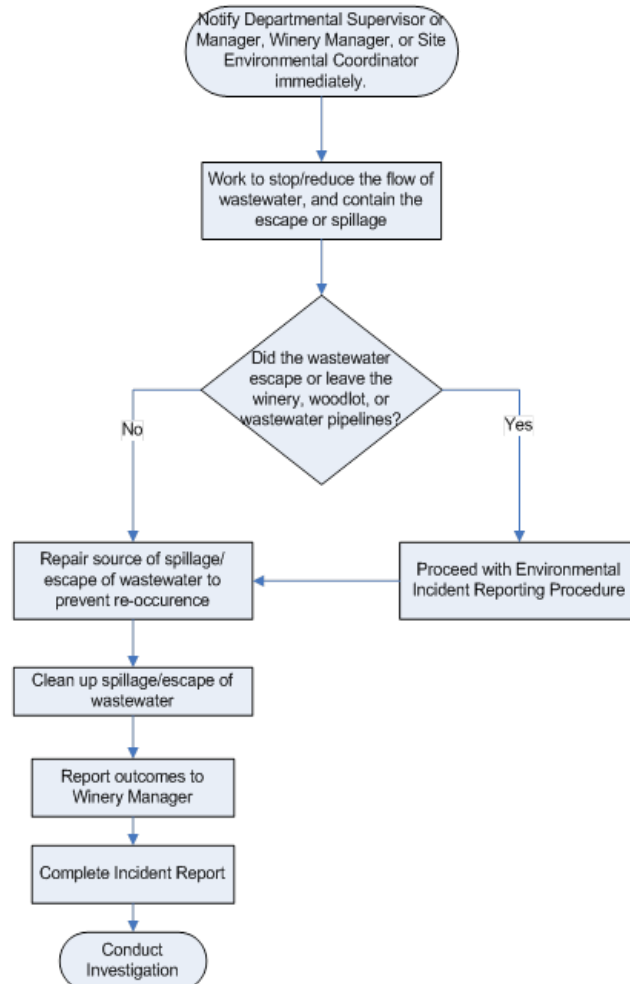
- a) Escape or Spillage of Wastewater





# Pollution Incident Response Management Plan

## EMERGENCY RESPONSE FLOWCHART: ESCAPE OR SPILLAGE OF WASTEWATER



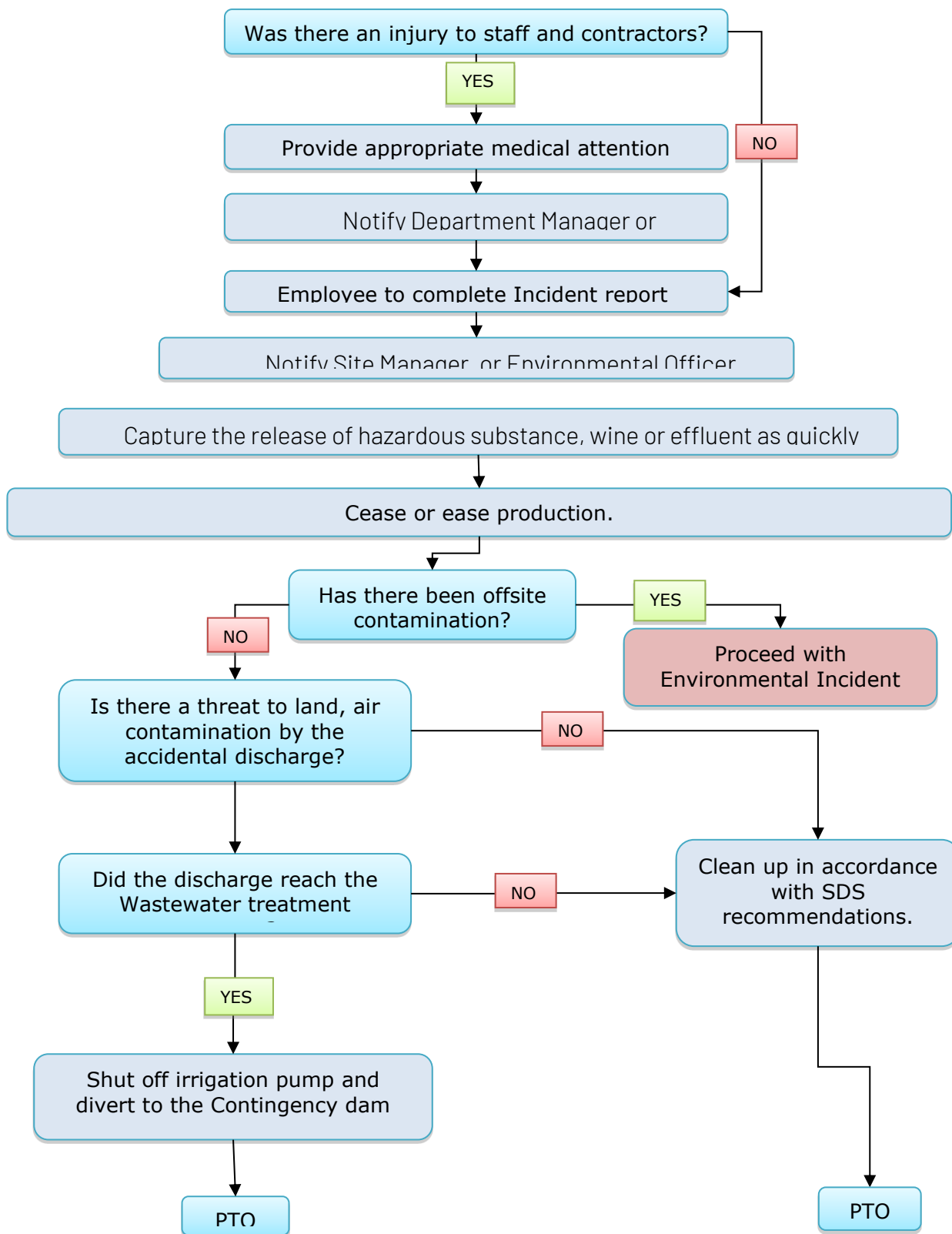
### b) Minor Hazardous and Non-Hazardous Spills

The process to be followed for minor hazardous or non-hazardous spills associated with chemicals listed in Section 4.2 is detailed below:





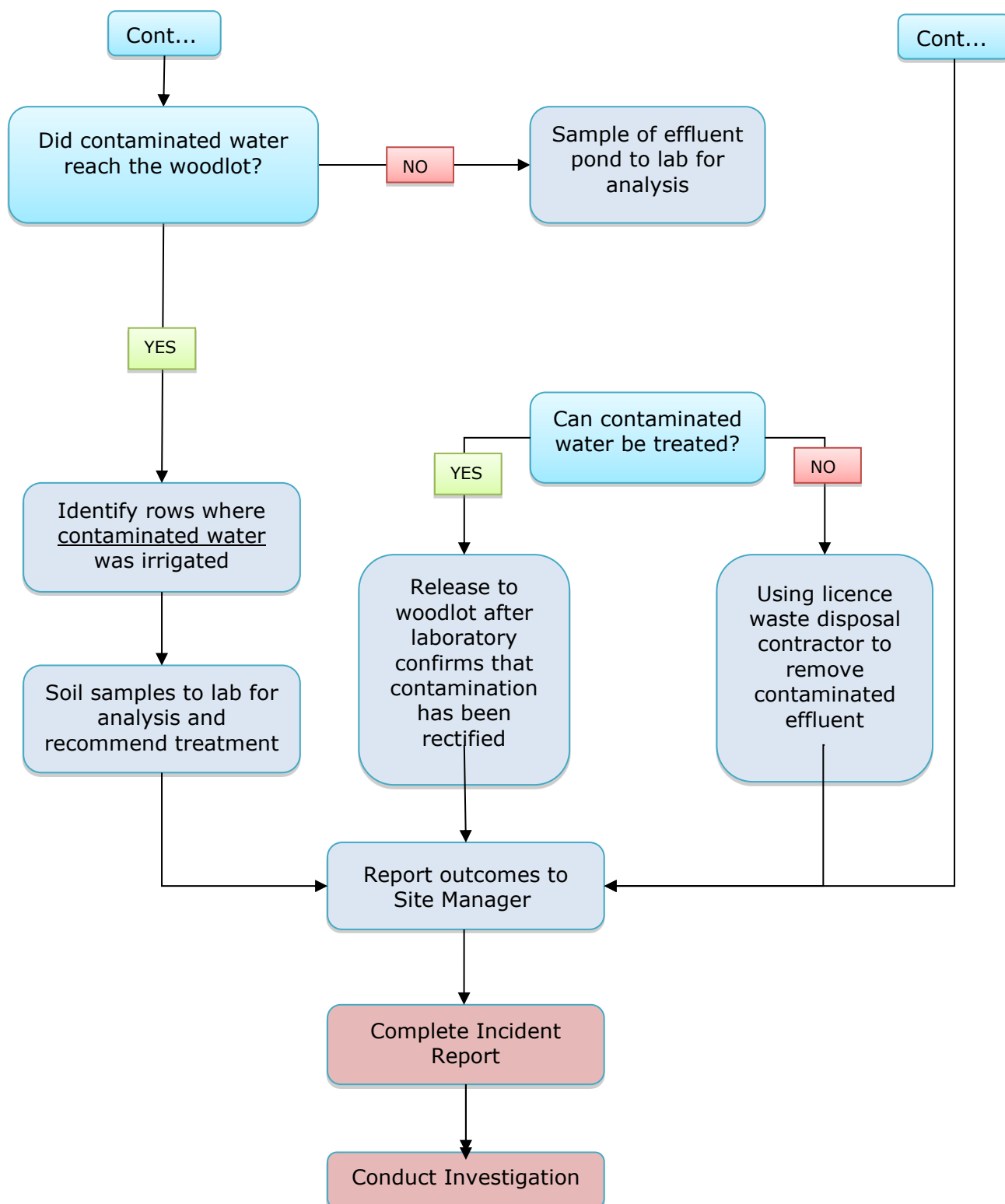
# Pollution Incident Response Management Plan







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## 8.3 Notification to Local Landholders and Community

Notification of the surrounding community and land holders is a crucial consideration and action if they are at risk.

The closest residence is approximately 200 m from the Site.

Information to be provided to the community will include the following:

- that an incident has occurred and what it is;
- potential impacts to local landholders and the community;
- site contact details; and
- advice or recommendations based on the incident type and scale.

The site will maintain contact with all neighbouring property owners that might be affected by the incident personally.

Their contact numbers are set out below:

NAME	CONTACT NUMBER
Australian Premium Dried Fruits – Adam Surgey	Mobile 0417131368
Russell Hammet (Neighbour)	Mobile 0407884872
Orange World	(03) 5023 5197
Ash Lanyon (Neighbour)	Mobile 0428500131

## 9 KEEPING THIS PIRMP UP TO DATE

### 9.1 Be alert, to changes triggering amendment!



It is important that this PIRMP is kept up to date with changes:

- to site activities (where things are stored, new chemicals, risks arising from new activities, etc.);
- to neighbours and surrounding land uses (i.e. retirement village now on our boundary);
- in legislation and guidelines; and
- in personnel responsible for activities under this plan.

## 9.2 PIRMP Compliance with Legislation

The chart below sets out the requirements of the relevant NSW legislation relating to PIRMPs and where those requirements are satisfied in this document. It should be updated as and when the legislation changes.

SECTION 153C	REQUIREMENTS	LOCATION IN DOCUMENT
(a)	<b>POEO Act</b> The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to: (i) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates, and (ii) The local authority for the area in which the premises to which the EPL relates are located and any area affected, or potentially affected, by the pollution, and (iii) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act)	Section 7.1  Section 8.3  Section 7.2



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SECTION 153C	REQUIREMENTS	LOCATION IN DOCUMENT
	<b>POEO Act</b>	
(b)	A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant EPL to reduce or control any pollution,	Sections 8.1 and 8.2
(c)	The procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,	Section 7.3
(d)	<b>POEO(G) Regulations</b> Any other matter required by the POEO (G) A Regulation (as set out below): <b>131(1)(a)</b> A description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity").	Section 4.1
	<b>131(1)(b)</b> The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	Section 4.1
	<b>131(1)(c)</b> Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.	Section 4.1
	<b>131(1)(d)</b> An inventory of potential pollutants on the premises or used in carrying out the relevant activity.	Section 4.2



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SECTION 153C	REQUIREMENTS	LOCATION IN DOCUMENT
	<b>POEO Act</b>	
	<b>131(1)(e)</b> The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.	Section 4.2
	<b>131(1)(f)</b> A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.	Section 5.1
	<b>131(1)(g)</b> The names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the POEO Act, and (iii) are responsible for managing the response to a pollution incident.	Section 3.1
	<b>131(1)(h)</b> The contact details of each relevant authority referred to in section 148 of the POEO Act.	Section 7.2
	<b>131(1)(i)</b> Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.	Section 8.3
	<b>131(1)(j)</b>	Section 4.1



# Pollution Incident Response Management Plan

SECTION 153C	REQUIREMENTS	LOCATION IN DOCUMENT
	<b>POEO Act</b>	
	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 on.	
	<b>131(1)(k)</b> A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any storm water drains on the premises.	Section 2.4
	<b>131(1)(l)</b> A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.	Section 4.1
	<b>131(1)(m)</b> The nature and objectives of any staff training program in relation to the plan.	Section 5.3
	<b>131(1)(n)</b> The dates on which the plan has been tested and the name of the person who carried out the test.	Section 5.5
	<b>131(1)(o)</b> The dates on which the plan is updated.	Section 9.3
	<b>131(1)(p)</b> The manner in which the plan is to be tested and maintained.	Section 5.4



## 9.3 Version Control

VERSION NO.	ISSUED TO	DATE
1	Wayne Ellis, Jamie Forte, Leonie Stanborough	November 11, 2019
2	Wayne Ellis, Jamie Forte, Leonie Stanborough	November 10, 2020
3	DW Site, Wayne Ellis, Jamie Forte, Leonie Stanborough, Cathy Oster, James Moriaty, Dylan Klingbiel	November 4, 2021
4	DW Site, Dylan Klingbiel, Jamie Forte, DCA	Decemeber 1, 2022

## 10 ANNEXURE 1 – CHECKLIST TO DETERMINE NOTIFICATION UNDER NSW LEGISLATION<sup>xi</sup>

QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
1	First, determine whether Duxton Winery had a "Pollution Incident"?	<ul style="list-style-type: none"> <li>Has there been an incident, event or set of circumstances which have caused or threatened a leak, spill or other escape or deposit of a substance either on-site or offsite?</li> <li>Note that this includes an incident, accident, event or set of circumstances in which a substance has been placed or disposed of on premises.</li> </ul>		



## Pollution Incident Response Management Plan

QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
2		<ul style="list-style-type: none"> <li>If 'Yes' to Question 1, has that leak, spill or escape or deposit resulted in "pollution" occurring or being likely to occur?</li> <li>You have "pollution" if you answer 'Yes' to questions 3, 4 or 5</li> </ul>		
3		<ul style="list-style-type: none"> <li>First, you will have <b>Water Pollution</b> if you answer 'Yes to any of the following questions: <ul style="list-style-type: none"> <li>Has any substance, whether solid, liquid or gas been placed in or on or introduced into or onto waters (whether through an act, accident or omission) so that the physical, chemical or biological condition of the waters is changed?</li> <li>Has any refuse, litter, debris or other matter, whether solid liquid or gas been placed in or on or otherwise introduced into waters so that the change in the condition of the waters or the refuse, litter, debris or other matter, either alone or together, makes or is likely to make the waters: <ul style="list-style-type: none"> <li>unclean, noxious, poisonous or impure, detrimental to the health, safety , welfare or property of persons;</li> <li>undrinkable for farm animals, poisonous or harmful to aquatic life, animals, birds or fish in or around the waters; or</li> </ul> </li> </ul> </li> </ul>		



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QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
		<ul style="list-style-type: none"> <li>unsuitable for use in irrigation; or</li> <li>obstructs or interferes with, or is likely to obstruct or interfere with persons in the exercise or enjoyment of any right in relation to the waters;</li> <li>Has any substance, whether solid, liquid or gaseous been placed in or on or otherwise introduced into or onto the waters (whether through an act, accident or omission), that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter?</li> </ul>		
4		<p>You will have <b>Air Pollution</b> if you answer 'Yes' to any of the following questions?</p> <ul style="list-style-type: none"> <li>Has there been an emission into the air of any air substance: <ul style="list-style-type: none"> <li>including smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists, odours and radioactive substances</li> </ul> </li> </ul>		



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QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
5		<p>You will have <b>Land Pollution</b> if you answer Yes to any of the following questions?</p> <ul style="list-style-type: none"> <li>Has any substance (solid, liquid or gas) been placed in or on, or otherwise introduced into or onto land (whether through an act or omission) that: <ul style="list-style-type: none"> <li>causes or is likely to cause degradation of the land, resulting in actual or potential harm to the health or safety of people, animals or other terrestrial life or ecosystems, or actual or potential loss or property damage that is not trivial?</li> <li>is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter?</li> </ul> </li> <li>Note this does not include any substance excluded by the regulations</li> </ul>		
		Note that although Pollution is defined to include Noise Pollution, if your incident or circumstances is only the emission of noise, then you do not have a 'Pollution Incident' to report.		
6	If a "Pollution Incident" is identified (as a result of the answers to	If based on the answers to the above questions you have a leak, spill, release, escape or deposition which has caused or has the potential to cause, Pollution (of air, land or water) then we have a Pollution Incident.		





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QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
	Questions 1-5 above), then we need to determine whether material harm to the environment has been caused or threatened?	<p>However, Pollution Incidents only need to be reported if they cause or threaten to cause Material Harm to the environment.</p> <p>To determine whether your Pollution Incident is causing or threatens to cause Material Harm to the environment the answer is 'Yes' it is, if you answer positively to any of the following questions:</p> <ul style="list-style-type: none"><li>• Has the Pollution Incident involved actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or</li><li>• Has the Pollution Incident result in actual or potential loss or property damage of an amount, or amounts in aggregate exceeding \$10,000?</li></ul> <p>(Note: loss includes the reasonable costs and expenses that would have been incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.)</p>		



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QUESTION NO.	QUESTION	QUESTIONS TO DETERMINE IF DUXTON WINERY NEEDS TO NOTIFY	YES / NO	NOTES
7	Exemptions	<p>You <b>do not</b> need to notify the following incidents:</p> <ul style="list-style-type: none"> <li>If you are aware that the incident has already been notified to the authority; or</li> <li>If the incident is an ordinary result of action required to be taken to comply with an environment protection licence or an environment protection notice.</li> </ul>		
8	If you have a "Pollution Incident" and it threatens or causes "Material Harm to the Environment" you must notify Immediately	<p>If the answers to the questions above indicate that:</p> <ul style="list-style-type: none"> <li>Duxton Winery has had a Pollution Incident (questions 1-5); and</li> <li>that Pollution Incident has caused or threatens to cause 'material harm to the environment' (question 6); and</li> <li>the Pollution Incident does not fall within a reporting exemption (question 7)</li> </ul> <p><b>then</b> you have an obligation to notify Immediately in accordance with this PIRMP.</p>		





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## 11 ANNEXURE 2 LEGISLATIVE REFERENCES

The following are the references to specific legislation which are footnoted throughout this document. As noted above, they should be checked at appropriate intervals of not less than 6 months to ensure that the legislation has not changed.

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<sup>i</sup> *Protection of the Environment Operations Act 1997 (POEO Act)*

<sup>ii</sup> Part 5.7A POEO Act.

<sup>iii</sup> Chapter 8, Part 4 POEO (G) Regulation.

<sup>iv</sup> Section 153F, POEO Act.

<sup>v</sup> Section 153D, POEO Act; and clause 132, POEO (G) Regulation.

<sup>vi</sup> Section 153E, POEO Act and clause 133, POEO (G) Regulation.

<sup>vii</sup> A 'material harm incident' as defined in Part 5.7 of the POEO Act.

<sup>viii</sup> Within the meaning of the *Privacy and Personal Information Protection Act 1998*.

<sup>ix</sup> Section 148, POEO Act.

<sup>x</sup> In accordance with Part 5.7, POEO Act.

<sup>xi</sup> Part 5.7 POEO Act.

Amendment recommendations Piper Alderman Ref AHW.424785 dated 21 October 2020.

Amendment recommendations Piper Alderman Ref AHW.431815 dated 19 November 2021.

Duxton Vineyards Asbestos Management Plan – Carter Corporation P/L

Duxton Vineyards Asbestos Register – Carter Corporation P/L