



# **JBS Pollution Incident Response Management Plan**

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**JBS Australia Pty Limited – Yambinya Station,  
NSW**

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Document Owner

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Printed copies of this document are deemed uncontrolled



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# 1. Introduction

## 1.1. Background

This plan has been developed to document the processes required to prepare for and respond to pollution incidents at JBS's Yambinya Feedlot Station in Burraboi, NSW 2732. The purpose of this plan is to:

- Outline the procedure for timely communication of an incident to staff, relevant authorities and appropriate stakeholders;
- Ensure that hazards to the environment, human health and safety are eliminated and where this is not possible minimized to an acceptable level; and
- Detail the controls and policies in place to ensure that this plan is effectively implemented and regularly reviewed by management and staff.

This plan has been prepared in accordance with the requirements introduced by the Protection of the Environment Legislation Amendment Act 2011 and the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plan) Regulation, 2012.

## 1.2. Scope & Purpose:

This Pollution Incident Response Management Plan applies to JBS's Yambinya Feedlot Station situated near the townships of Coolah and Deniliqui in Southern NSW. The Yambinya feedlot has been closed since 2011 however this facility is still licenced by the EPA. Yambinya's EPA licence details are provided in the table below:

<b>Company</b>	JBS
<b>EPL Number:</b>	5245
<b>Scheduled Activities</b>	Extractive Activities Livestock Intensive Activities
<b>Site Name and address</b>	Yambinya Station, Jimbaringle Road, Burraboi, NSW 2732



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. Site Description**

The Yambinya feedlot is located near Coolah and Southwest of Deniliquin in South west NSW. The site was acquired by JBS in 2009 and has an operational capacity of 12,000 and 40,000 lamb. The site ceased operations in September 2011. The site is still licenced by the EPA under licence number 5245.

### **1.4. Pollution Incident Response Management Plan**

This PIRMP applies to all employees, visitors and contractors within the boundaries of the JBS Yambinya facility. This document is designed to satisfy the requirements of the EPA's Environmental guidelines: Preparation of pollution incident response management plans (2012). This document will act as a standalone document but will also be incorporated into JBS's Emergency Response Plan that has been drafted in accordance with Australian Standard AS3745. This plan provides comprehensive details of emergency management procedures to be followed during an emergency event.

## **2. Hazard and Pollution Identification**

A list of hazardous and dangerous goods listed in the permits held by Yambinya was developed with an appropriate spill response. The master MSDS spreadsheet contains an inventory of potential pollutants that are stored on the premises at Yambinya. This inventory includes details of potential pollutants at the storages, the maximum quantity that is likely to be stored or held at the facilities, and whether the storages have the potential to be associated with a material pollution incident.

As detailed above, the site is not operational at present so there is a very small quantity of chemicals and pollutants stored at the site. Site maps that detail the locations of pollutants and also the location of emergency response equipment are provided in Appendix A of this plan.



Environmental Site Inspections are completed on a regular basis. An example of this inspection form is contained in Appendix C.

## **2.1. Hazard Identification and Assessment**

JBS has developed a comprehensive Risk Register that details environmental and health risks that may occur due to a pollution incident. The figure below illustrates the risk assessment process that was developed to identify the appropriate management measures for environmental risks.

1. The likelihood of the incident having an impact on the environment
2. The potential consequence of the incident occurring
3. A risk rating is assigned based on how severe the potential impact might be
4. A risk priority of action is assigned based on the risk rating

When a significant impact to the environment is identified, robust measures will be put in place to reduce the risk to an acceptable level.

Yambinya Feedlot is non-operational at present therefore it is considered a very low risk site in terms of environmental hazards.



Figure 1: JBS Risk Assessment Process

	Consequences (1 to 4)			
Likelihood (1 to 4)	1 Extreme	2 Major	3 Moderate	4 Minor
1 Very Likely	1	2	3	4
2 Likely	2	3	4	5
3 Unlikely	3	4	5	6
4 Very Unlikely	4	5	6	7
Most Effective  Least Effective				
Eliminate	Substitute	Engineering	Administration	Personal Protective Equipment
Score	1, 2 or 3	4 or 5	6 or 7	
Risk Priority Actions	Do something about these risks immediately	Do something about risks as soon as possible	These risks may not need immediate action	



Table 1 provides an overview of the site specific environmental risks at Yambinya.

**Table 1: Overview of Potential Environmental Risk at Yambinya**

Risk Category	Description of Risk/Hazard	Mitigation Strategies
<b>Water</b>	Bad disposal of sewage and/or residual water (contamination of local ground / water resources). Depletion of natural resources (water). Possible non-compliance with licence requirements.	<ul style="list-style-type: none"> <li>• Complete regular environmental risk assessments of the site</li> <li>• Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process.</li> <li>• Ensure that processing facilities are not overloaded leading to a breakdown.</li> <li>• Provide training to all staff on the risks associated with inappropriate disposal of effluent.</li> <li>• Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> </ul>
<b>Land/Soil</b>	Bad disposal of sewage and/or waste (contamination of soil e.g. oil spillage). Depletion of natural resources Possible non-compliance with licence requirements.	<ul style="list-style-type: none"> <li>• Complete regular environmental risk assessments of the site</li> <li>• All employees to complete waste management training as part of the environmental training programme.</li> <li>• Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process.</li> <li>• Ensure that processing facilities are not overloaded leading to a breakdown.</li> <li>• Provide training to all staff on the risks associated with inappropriate disposal of effluent.</li> <li>• Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> </ul>



Risk Category	Description of Risk/Hazard	Mitigation Strategies
<b>Hazardous Substances</b>	Environmental Pollution due to spills or leaks of chemicals resulting in emissions to air, water soil or ground. Breaches of EPA licence and associated legislation. Production of Hazardous waste	<ul style="list-style-type: none"> <li>• Develop, review &amp; maintain a program for hazardous substances</li> <li>• Establish and maintain an MSDS register Provide safe storage for hazardous substances</li> <li>• Ensure all hazardous substances are labelled</li> <li>• Conduct risk assessments on hazardous substances</li> <li>• Chemical Tracking And Risk Assessment Process for all new chemicals</li> <li>• Ensure that employees only handle hazardous substances after training and assessment.</li> <li>• Storage should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> <li>• Comply with Emergency Response plan &amp; Dangerous Goods Management</li> </ul>
<b>Fire &amp; Explosion</b>	Flammable and explosive compounds are stored at the site, there is also fire risks associated with a number of processes e.g. bulk gas storage and other fuel storage.	<ul style="list-style-type: none"> <li>• Develop, review &amp; maintain a program for hazardous substances</li> <li>• Establish and maintain an MSDS register</li> <li>• Provide safe storage for hazardous substances</li> <li>• Ensure all hazardous substances are labelled</li> <li>• Conduct risk assessments on hazardous substances</li> <li>• Chemical Tracking And Risk Assessment Process for all new chemicals</li> <li>• Ensure that employees only handle hazardous substances after training and assessment</li> </ul>
<b>Biological Hazards</b>	Production of hazardous biological waste. Environmental Pollution due to spills or leaks of chemicals resulting in emissions to air, water soil or ground. Breaches of EPA licence and associated legislation. Production of Hazardous waste	<ul style="list-style-type: none"> <li>• Develop, review and maintain a program to control the risk of blood borne diseases.</li> <li>• Compliance training and audits. Adequate controls in place to ensure there is no release of these waste to the environment and community</li> </ul>
<b>Security Risks</b>	Unauthorised persons accessing the facility and causing damage to equipment or processes, leading to environmental damage.	<ul style="list-style-type: none"> <li>• Provide appropriate security to prevent unauthorised persons interfering with the tank or opening valves, etc. That may lead to a spillage of liquids and/or gases and a subsequent fire risk and/or environmental pollution risk.</li> </ul>





Risk Category	Description of Risk/Hazard	Mitigation Strategies
General	Carbon Emissions. Resource depletion. Previously unidentified and uncontrolled hazards.	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site</li> <li>Compliance with EPA licence.</li> <li>Environmental awareness training for staff.</li> </ul>

## 2.2. Safety Equipment & Maps

Safety equipment is located at a number of locations throughout the site. This equipment is checked regularly in accordance with the OH&S plan. The Maps located in Appendix A detail the locations of Emergency & Evacuation Response Equipment throughout the site.

As the site is currently unoccupied there is a low risk of an incident occurring that requires safety equipment.

## 2.3. Incident Response

JBS's Emergency Response Plan provides comprehensive details of the procedures to be followed in the event of an emergency incident occurring (including environmental emergencies)

In addition to this JBS has developed a Hazard, Incident Investigation and Regulatory Contact Reporting Procedure (CORPENV4 22/11/2010). The purpose of this procedure is to outline the processes for investigating and report all potential hazards, incidents and Regulatory Contact. The results of these investigation are then used to improve overall Environmental performance.

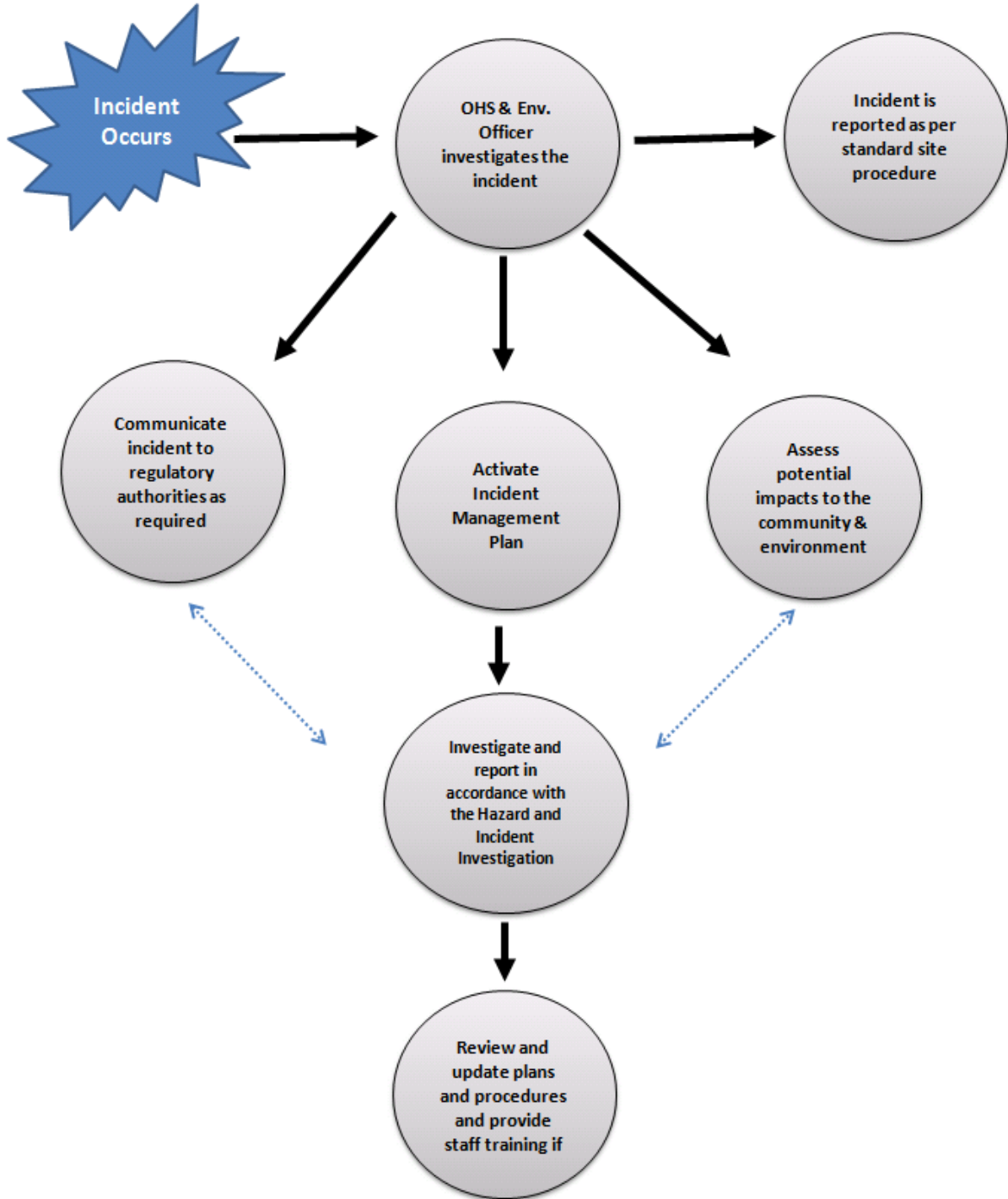
This plan details the procedure Environmental Incident Protocol in line with their Environmental Management Plan (EMP) which also details corrective actions if an environmental incident should occur. A sample Non Compliance, Incident and Corrective Action form is included in Appendix B.

JBS' Environmental Spill Response Procedure is provided in Appendix D.

The illustration below details the JBS process for responding to Environmental incidents at the Yambinya Site.



## JBS Incident Response Protocol





### 3. Communication

#### 3.1. Communicating 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 OHS & Environment Officer.

JBS Contacts	
Environmental Manager JBS	03 9316 4732
Government Contacts	
EPA	131 555
Albury Council	(02) 6022 0600
WorkCover	131 050
Fire & Rescue NSW	1300 729 579
Emergency Services	000

#### 3.2. Communicating with Local Residents:

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

- Phone call by OHS & Environment Officer
- 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 may only make Press Statements on behalf of JBS Australia. Administration staff is to be advised to respond to any queries with:

## 4. Training & Document Control

### 4.1. Staff Awareness and Training

All staff and contractors are required to complete the one day “Introduction to Environment-PRC61” induction training, all site staff are provided with sufficient environmental awareness training. The contents of this training include:

- Informing employees of their impacts on the environment and how they can prevent or minimise these impacts will lead to sound environmental practices;
- 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;
- Environmental procedures to be followed.

All persons who complete this training will be made aware of the contents of this plan. All persons will be required to complete refresher training on an annual basis.

### 4.2. Document Availability

In accordance with Section 153D of the POEO Act, the plan 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 Yambinya site office.

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

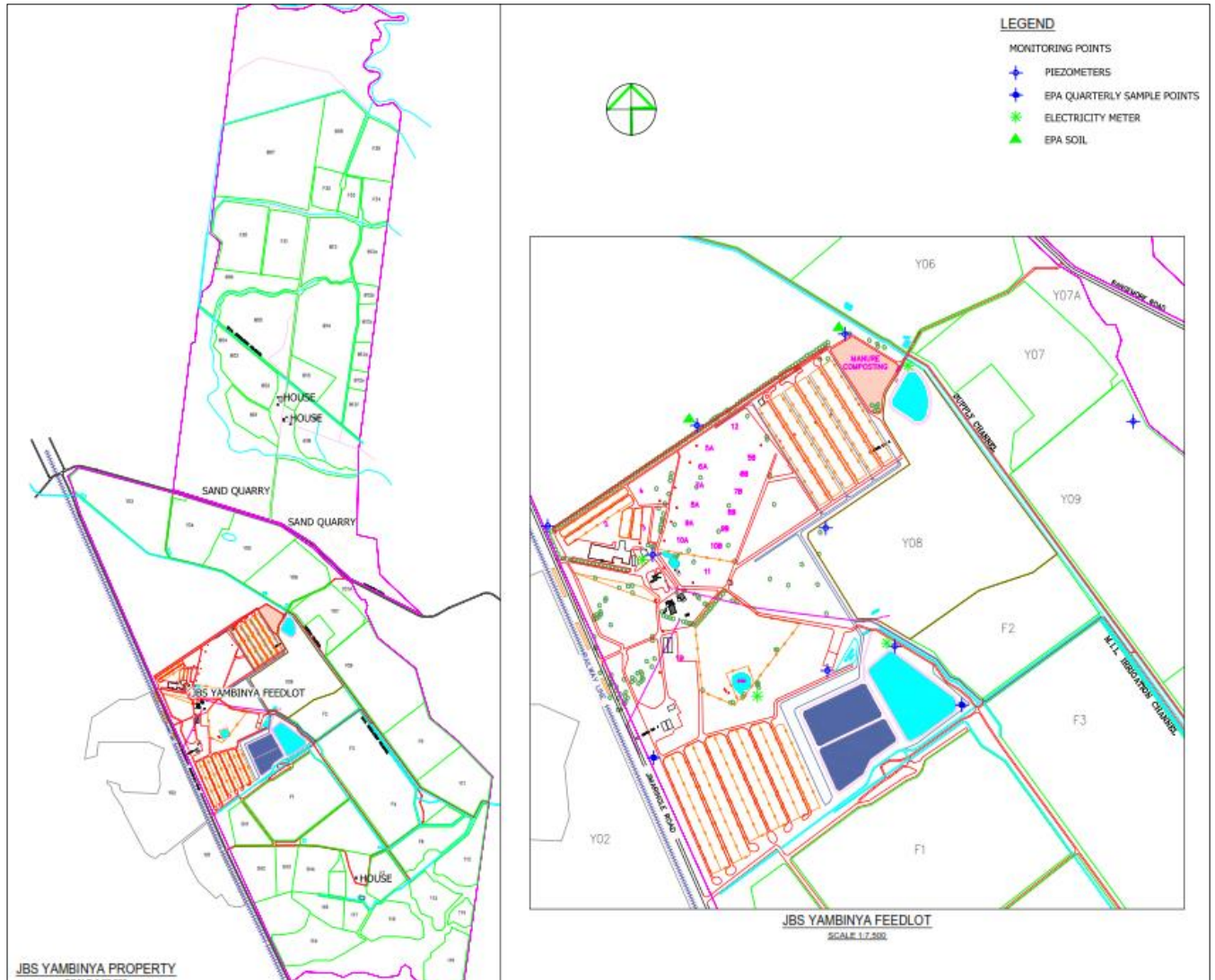
- Uploading a public version of the plan to the JBS Australia website at <http://www.jbssa.com.au/>
- Providing copies of the public version of the Plan, without charge, to any member of the public who may request a copy.



### **4.3. Testing of Plan**

This plan will be tested at least once every 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.

# Appendix A: Site Layout and Monitoring Locations



## Appendix B: Non-compliance, Incident and Corrective Action Form

Company/Department:	Project Name:	Registered Incident No:
Type of Construction Activity:	Location of Incident:	Date & Time of Incident: Date: . Time: .
Type of Incident:  Spill or leak of hazardous fluids onto unprotected ground. Fluid Type (Oil, diesel or gasoline): . Spill or leak of other chemicals and/or fluids (please list below): Other (Please describe):		
Incident Observed by:  Name:  Position:		
Short-Term Corrective Action: (Action taken to clean up any resulting contamination and to achieve compliance with regulations)		
Short-Term Corrective Action carried out by:  Name: Position:		
Long-Term Corrective Action: (Measures to be implemented to prevent repeated non-compliance incident of similar nature.)		
Long-Term Corrective Action carried out by:  Name: Position:		

Company/Department:	Project Name:	Registered Incident No:
Project Environmental Manager: (Short-term corrective action completed)  Signature: Date:		Project Environmental Manager: (Long-term corrective action completed)  Signature: Date:
Project Manager:  Signature: Date:		Project Manager:  Signature: Date:



## Appendix C: Environmental Site Inspection Form

Environmental Measures	Observations	Comments	Compliance Level
Waste Management			
Noise Management			
Combustion Gases & Dust Management			
Materials & Dangerous Materials/Substances Management			
Wastewater Management			
Other Environmental Measures			
TOTAL			

**(Use weighted average of results to determine the percentage of compliance)**

Compliance Level	
0 - Low	Several deviations observed.
1 - Medium	A few small deviations observed
2 - Good	No significant deviations observed
3 - Full	No deviations observed

## Appendix D: JBS Environmental 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 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
- 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
- Could contaminate ground water

The table below is a guide for normal and abnormal discharges to bunded areas, areas discharging to effluent and areas outside effluent Catchment. These items and levels are indicative for typical items at Caroon. Items not on this list should be reported to the weighbridge for a determination of correct procedures.

Material	Acceptable Level (Guide Only)	
	<i>Bunded Areas and Areas discharging to effluent</i>	<i>Areas outside effluent Catchment</i>
Effluent	2ML per day	0ML per day
Paunch	10T per day	50kg per day
Hot water screenings form save all	3T per day	50kg per day
Mineral Oil	0.5L per spill	0.5L per spill
Vegetable Oil	3L per day	3L per spill
Diesel	3L per spill	3L per spill
Petrol	3L per spill	3L per spill
Cleaning products	300L per day	25L per spill
Acids (concentrated)	207kg per day	1L per spill
Oxidising Agents (Chlorite)	129kg per day	10L per spill
Blood	7000L per day	200L per spill
Tallow	2T per day	0.2T per spill
Meat Meal	1T per day	0.1T per day
Medical Waste	0T per day	0T per day
Molasses	200kg per day	200kg per day

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

- Contain the spill
- Control the discharge
- Determine the disposition of spill and adsorbent material
- Clean the area

The incident is and clean up is performed in consultation with the Environmental Officer and/or Group Environmental Manager.

Environmental Spills should be recorded in CORPENV A1 4-1 Environmental Haz or Incident Investigation and Regulatory Contact Reporting and may require reporti