

Ingredion ANZ Pty Ltd

170 Epping Road, Lane Cove, NSW 2066

EPL: 518

1. Purpose and Background

The purpose of this Pollution Incident Response Management Plan (PIRMP) is to provide the requirements to satisfy the obligations under the *Protection of the Environment Operations Act 1997* (the “POEO Act”) for licensed facilities.

Under Ingredion’s Lane Cove Site Crisis Management and Emergency Action Plan (the “Red Book”), detailed emergency response procedures are in place for the management of pollution incidents across the facility. Under the provisions of Part 3A of Chapter 7 of the *Protection of the Environment Operations (General) Regulations 2009* (the “POEO Regulations”), Ingredion’s obligations regarding the existence and content of a PIRMP can be satisfied through Ingredion’s existing plans in the Red Book, provided they are readily identifiable as such.

This PIRMP has been developed as a reference to the site’s existing crisis and emergency response plans. It also details additional supplementary site specific information as required under the POEO Act in respect to the facility’s Environment Protection Licence (EPL), Licence Number 518.

A copy of this PIRMP is available for the public on Ingredion’s web site. Alternatively, Ingredion will make a copy available without charge to anyone who makes a written request.

2. Scope

This PIRMP covers Ingredion ANZ Pty Ltd’s Lane Cove site. This PIRMP applies to all activities, products and services on the site over which Ingredion has operational control and applies to all staff.

3. Legislative Requirements

This PIRMP has been developed and implemented to satisfy Ingredion’s obligations under:

- a) Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act);
- b) *The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*; and
- c) The site Environment Protection Licence (EPL).

4. Notification of a Pollution Incident

4.1 What must be notified

A pollution incident is required to be immediately notified if there is a risk of “material harm to the environment”, which is defined under Section 147 of the POEO Act as:

- actual or potential harm to the health or safety of human beings, or to eco-systems, that is not trivial, or
- actual or potential loss or property damage exceeding \$10,000 in total (or such other amount as is prescribed by the regulations),

“Loss” includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good the harm to the environment in relation to the incident.

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4.2 Responsibility to notify

Under Section 148 of the POEO Act, Ingredion has a duty to notify immediately (i.e. promptly, and without delay, after it becomes aware of the incident) if there is a pollution incident in the course of our activity on the Site that causes or threatens material harm to the environment. Our staff are required to notify Ingredion as soon as they become aware of such an incident, so that Ingredion can then discharge its reporting obligations.

Details of who must be notified and the relevant contact details are at 7.1 below.

5. Identification of Likely Hazards

5.1 Risk assessment

A risk assessment process was carried out to identify and evaluate any aspects and impacts at the Lane Cove site that are likely to pose a risk to the health and safety of staff and others on or near the site, or to the environment, in the event of an emergency situation.

5.2 Risk Rating

Measures the Consequence (or impact) of the potential hazard:

Level	Descriptor	Description
1	Low	<ul style="list-style-type: none"> - Impact on operations, result of \$500 - \$5,000 - Minor adverse impact to public or staff - First aid treatment required - Environmental spill of <50 litres
2	Medium	<ul style="list-style-type: none"> - Impact on operations, result of \$5000 - \$50,000 - Temporary shutdown of process - Moderate adverse impact to public or staff - Medical treatment required - Moderate environmental damage without affecting eco-system
3	High	<ul style="list-style-type: none"> - Impact on operations, result of \$50,000 - ≥\$1,000,000 - Loss of business capability - Major adverse impact to public or staff - Extreme injuries - Significant damage to environment, major breaches of legislation with significant fines

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5.3 Description and likelihood of hazards

The main potential hazards to health or the environment identified are as follows:

Description	Event	Likelihood *H / M / L	Current Control
Hazardous Chemicals	Chemical Spill / Release of liquid	L	<ul style="list-style-type: none"> • Regular inspections of storage vessels. • All chemical storage areas are bunded. • Spill Kits are located near locations where significant quantities of chemicals are stored or used • Level indication on all chemical storage tanks.
Spill / Release from site into river.	Heavy rain event washing contaminants from site roadways	L	<ul style="list-style-type: none"> • All rain water from manufacturing areas is captured into first flush pits. If contaminated, the water is sent to the on-site waste water treatment plant instead of to storm water.
Spill / Release from site into river.	Failure of a liquid storage tank	L	<ul style="list-style-type: none"> • Regular inspections of storage vessels. • Bunding around tank storage areas. • Spill kits are available. • Run off from manufacturing areas is captured into first flush pits. If contaminated, the water is sent to the on-site waste water treatment plant instead of to storm water.
Spill / Release from site into river.	Spill during loading or unloading of liquids	L	<ul style="list-style-type: none"> • Safe Work Operating Procedures for loading/unloading. • Bunding around storage and loading/unloading areas. • Spill Kits are available. • Run off from manufacturing areas is captured into first flush pits. If contaminated the water is sent to the on-site waste water treatment plant instead of to storm water.
Spill / Release from site into river	Burst liquid transfer pipe	L	<ul style="list-style-type: none"> • Regular inspection of pipes. • Spill Kits are available. • Run off from manufacturing areas is captured into first flush pits. If contaminated the water is sent to the on-site waste water treatment plant instead of to storm water. •

*H – High / M – Medium / L – Low Risk

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5.4 Summary of Typical Pollutants

The Ingredion Lane Cove facility has a limited list of typical pollutants which have been considered. The list below covers the main types:

Description	Comments
Air Based Emissions	
Dust	Dust from the process of manufacturing starch ingredients, for example corn dust, starch dust and gluten dust. Equipment and operating procedures have been developed to minimise dust.
Fire	Fire is not considered an environmental incident, however, the smoke from the fire can be and can affect the neighbours. Detailed Fire Management procedures are covered in the Red Book.
Noise	Noise is not considered a pollution incident and not covered further under this plan, however, it is included in the facility's Environment, Health, Safety and Sustainability Plan (EHSS).
Odour	Odour incidents are not considered to be material environmental harm. Odour is rarely associated with the activities undertaken on the site, however, detailed procedures are included in the Red Book.
Spill type emissions	
Flammable Chemicals, Class 3 and 4	Used for plant and equipment operations. Covered under: <ul style="list-style-type: none"> • Dangerous Goods notification acknowledged by NSW WorkCover • Site chemical inventory and Safety Data Sheet (SDS) Register, which can be found on the local X:\ISO Drive and the Ingredion ANZ intranet site. Also numerous hard copies are stored throughout the facility. • Details of safety equipment to protect staff from any health risks are contained in the relevant sections of the Red Book the facility's Environment, Health, Safety and Sustainability Plan (EHSS).
Other combustible Liquids Lubricants & hydraulic oils etc	<ul style="list-style-type: none"> • Site chemical inventory and Safety Data Sheet (SDS) Register, which can be found on the local X:\ISO Drive and the Ingredion ANZ intranet site. Also numerous hard copies are stored throughout the facility • Details of safety equipment to protect staff from any health risks are contained in the relevant sections of the Red Book the facility's Environment, Health, Safety and Sustainability Plan (EHSS).
Liquid starches	<ul style="list-style-type: none"> • These are food starch products and not hazardous and can be clean up without any additional safety precautions. • Details of how to clean up these spills are contained in the relevant section of the Red Book.
Other dangerous goods classes e.g. <ul style="list-style-type: none"> • Compressed gases • Corrosive substances • Oxidizing substances 	Used for plant and equipment operations. Covered under: <ul style="list-style-type: none"> • Dangerous Goods notification acknowledged by NSW WorkCover • Site chemical inventory and Safety Data Sheet (SDS) Register, which can be found on the local X:\ISO Drive and the Ingredion ANZ intranet site. Also numerous hard copies are stored throughout the facility. • Details of safety equipment to protect staff from any health risks are contained in the relevant sections of the Red Book the facility's Environment, Health, Safety and Sustainability Plan (EHSS).

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Paints, inks & surface coatings	Surface coatings are applied on site by preferred contractors, who adhere to site's contractor management program. A Permit to Work (PTW) is completed prior to any work being undertaken (environmental spill considerations form part of the PTW based on SDS).
Pesticides	Control of weeds and pests. These activities are undertaken by preferred contractors, who adhere to site's contractor management program. A Permit to Work (PTW) is completed prior to any work being undertaken (environmental spill considerations form part of the PTW based on SDS).
Other Chemicals	<p>Used for plant and equipment operations. Covered under:</p> <ul style="list-style-type: none"> • Dangerous Goods notification acknowledged by NSW WorkCover <p>Site chemical inventory and Safety Data Sheet (SDS) Register, which can be found on the local X:\ISO Drive and the Ingredion ANZ intranet site. Also numerous hard copies are stored throughout the facility</p> <p>Details of safety equipment to protect staff from any health risks are contained in the relevant sections of the Red Book the facility's Environment, Health, Safety and Sustainability Plan (EHSS).</p>
Aqueous wastes, Process water and Storm water	<p>Management of wastewater and storm water:</p> <ul style="list-style-type: none"> • All process water is treated in the on-site waste water treatment plant prior to release to sewer <p>Rain water from road surfaces is collected in First flush pits and transferred to on-site waste water treatment plant if contaminated.</p>
Wastes: General, Paper, Metal, Corn waste	<p>Management of waste. Waste streams are separated and recycled through contractors. General waste is sent to landfill. Process and contractors are managed through:</p> <ul style="list-style-type: none"> • Contractor Management Program <p>Waste Management Procedure (located located X:\ISO Drive; on the Ingredion ANZ intranet SharePoint</p>

6. Emergency response

If a pollution incident occurs, all necessary action must be taken to minimise the size and any adverse effects of the incident. The detailed procedure to be followed is covered in Part 1, Sections 1.4; 1.6, Part 2 & 3 in the Red Book and also Sections 5 and 7 of this PIRMP.

If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (call 000).

The other response agencies (Environment Protection Authority (EPA), NSW Health, WorkCover NSW and the local councils) will be contacted as soon as practicable after in accordance with our notification obligations.

7. Notification and Communication Procedures

7.1 Notification and Contact Details for Relevant Authorities

In the event an environmental incident causes or threatens material harm to the environment at the Lane Cove site, staff must immediately notify the first available of the following managers to report the matter:
 Manufacturing Manager, Frank Geurts - 9911 1201 or 0405 142 659
 EHSS Specialist, Elaine Koeford – 9911 1280 or 0450 005 386
 General Manager, Thomas Henriksen - 9911 1220 or 0410 163 143

Where there is an environmental incident that causes or threatens material harm to the environment the Manager will then ensure that the following relevant authorities, as appropriate, are contacted immediately:

Order	Authority	Phone Number
1.	If there is an immediate threat to human health, environment or property: Contact Emergency Services	000 (Or 0-000 if calling from site land line)
2.	Environment Protection Authority – Pollution Hotline	131 555
3.	NSW Ministry of Health	(02) 9391 9000
4.	NSW WorkCover	131 050
5.	Local Council: – Lane Cove Council – Willoughby Council	(02) 9911 3555 (02) 9777 1000
6.	Fire & Rescue Hotline (if 000 has not already been called)	1300 729 579

Complying with these notification requirements does not remove the need to comply with any other specific obligations for incident notification, for example under legislation administered by WorkCover NSW (refer to the Red Book for details of specific requirements).

7.2 Communication with the local community

Communication and updates to the local community (i.e. surrounding businesses and residents) regarding pollution incidents will be undertaken in accordance with the site’s existing crisis and emergency response procedures (detailed in Section 3 of the Red Book), dependent upon the nature and scale of the incident.

7.2.1 Immediate neighbours

In the event of a notifiable pollution incident, and dependent upon the nature and scale, immediate neighbouring properties will be contacted under the direction of Emergency Services with immediate response information.

7.2.2 Site Maps

The site maps are all contained in the relevant section of the “Red Book”, or upon request in writing. For security reasons, access by persons outside of Ingredion to these site maps is carefully controlled.

7.2.3 Testing of the PIRMP

The site will test the PIRMP as required by regulation. Currently this requires testing at least every 12 months and within 1 month of any pollution incident occurring. Testing of the PIRMP will include an assessment of whether

the information included in our PIRMP is accurate and up to date and the PIRMP can be implemented in a workable and effective manner.

7.8.4 Site Contact details

The Ingredion ANZ Pty Ltd (Lane Cove) site contact details are:

Address: 170 Epping Road,
LANE COVE NSW 2066

Phone: (02) 9911 1200 or (02) 9911 1282 / (02) 9911 1296 afterhours

8. Staff Training

Training will be conducted regarding the this PIRMP, including the relevant sections of the Red Book to ensure that relevant staff are aware of the actions to be taken in the event of a pollution incident on the site. Frequency of the training will be as identified by Ingredion's training needs assessment process. Records of the training will be maintained in accordance with Ingredion's record keeping procedures.