



Pollution Incident Response Management Plan Public Information

Highland Pine Products NSW Environmental Protection Licences.

- Highland Pine Site 1 – EPL 887
- Highland Pine Site 2 – EPL 11229
- Highland Pine Bathurst – EPL 105

Review Register

Review Date	Review Team	Changes Made (Section)
1. 1/12/18	DM, SK	Update of original document drafted for review.
2. 1/03/19	SK, BG, DK	Approved for website publication
3. 14/5/20	Sk/BG,DK	Reviewed - Updated
4. 13/10/20	SK	Appendices – updated wall chart and protocol docs
5. 27/07/21	SK	Wording/format change. Update appendices.

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	Related to	POEO Act 1997	Revision	A
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Introduction.

This Pollution Incident Response Management Plan (PIRMP) has been developed to conform to requirements as outlined in the Protection of the Environment Operations Act (POEO Act) 1997 and subordinate legislation. This document covers Highland Pine Products (HPP) NSW operations. The plan applies to emergency services, all employees, visitors, contractors and also potentially impacted off site receptors in the event of a pollution incident.

The purpose of this plan is to:

- Detail how the business will assess and respond to a pollution incident to minimize the potential harm to human health and the environment.
- Detail the process to ensure timely reporting of incidents, and
- Detail how the business will notify those within the vicinity of the operations of potential impacts should a pollution incident occur.

HPP NSW Operations.

This plan is applicable to the following Highland Pine Products premises.

Site	Location	Environmental protection licence	Link
Highland Pine Site 1 Oberon	Gate 3 Albion St Oberon	EPL 887	https://apps.epa.nsw.gov.au/prpoeoapp/
Highland Pine Site 2 Oberon	Gate 3 Albion St Oberon	EPL 11229	
Highland Pine Treatment Plant Bathurst	Stuart St Bathurst	EPL 105	

Table 1: HPP Operations in NSW.

Legal Requirements.

Under the Protection of the Environment (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, **key parts of the overall plan must be made available** and easily accessible to the general public via the business website.

This PIRMP must be tested/reviewed within 1 month of a pollution incident and at least once annually. The Act imposes significant penalties for not preparing, keeping on site, maintaining, testing and implementing a PIRMP.

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This plan is available electronically and can be accessed via the HPP website or can be viewed in hard copy at Gate 3 Security (24hrs), Albion St Oberon NSW 2787.

Activation of this Plan.

All pollution incidents will be measured against this plan which will be activated when a pollution incident has the potential to cause material harm.

An incident is considered material under s.147 of the POEO Act if;

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
 - the loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.
- It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

The incumbent in the following roles are authorised to activate the PIRMP and notify the required authorities.

- General Manager
- Site Services Manager
- Operations Manager
- Site Lead Team Members.

When an immediate threat to human life or property exists, all personnel are authorised to Dial 000 for emergency services and enact individual site emergency response plans.

Plan Objectives.

The objective of this plan is to;

- Detail methods used to assess main hazards.
- Detail controls that may be implemented to reduce risk of hazards impacting on the receiving environment.
- Describe systems for dealing with pollution incidents.
- Outline incident management structures. And,

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- Detail the required review and update process.

Description and Loss Likelihood of Main Hazards.

A survey of potential pollutants on each site has been conducted. This process has identified hazards with potential to impact on the environment which are then assessed using a consequence matrix as detailed in **Table 2**. Potential pollutants with risks scores of Insignificant are not considered main hazards.

Consequences	Risk of Hazard to Environment and/or People				
	Insignificant	Minor	Moderate	Major	Disastrous
	No measurable environmental impact. Very low level toxic and not dangerous.	Measurable environmental impact. Mildly toxic or low level dangerous.	Noticeable environmental impact. Toxic and medium level dangerous.	Significant environmental impact. Very toxic and high level dangerous.	Catastrophic environmental impact. Extremely toxic and very dangerous.

Table 2: Consequence Matrix – Main Hazard Identification.

Risk Reduction Controls.

Infrastructure controls have been installed across all sites to reduce the potential for harm to human health and the environment. Where appropriate, administrative controls may also be used and subject to the potential risk several controls may be implemented for a specific hazard. The effectiveness of risk reduction controls (both infrastructure and administrative) have been assessed using the business risk rating matrix.

Types of controls implemented to date are detailed in **Table 3: Infrastructure controls** and **Table 4: Administrative controls**. As new risks are identified and in the event of a loss, controls will be assessed for effectiveness and suitability.

Control	Purpose
Bunding	Act as secondary containment for liquid pollutants. Key control for bulk liquid storage systems.
Sprinkler System	Reduce risk and extent of fires.
Spill Kits	Limit impact of liquid pollutant spills for minor to moderate spill events.
Triple/Single Interceptors	Reduce amount of pollutants discharged from site. Control of gross solids and oils.
First Flush Dams	Reduce amount of solid pollutants discharged from site.
Water Treatment Plant	Reduce amounts of contaminants discharging from site.

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Over/Under Interceptors	Reduce amount of solid pollutants discharged from site.
Gate Valves	Contain spills to site for more effective clean up.
Back Flow Prevention Devices	Prevents process water backflow from re-entering town supply.
Fire Hydrants	Reduce risk and extent of fires
Crash Barriers	Protect infrastructure from mobile plant collisions.

Table 3: Infrastructure Controls implemented across HPP's NSW operations.

Control	Purpose
Standard Operating Procedures and Permit to Work System	Provide instruction for proper response to incidents and safe work procedures. Reduces the risk of an incident through operator error/lack of understanding.
Housekeeping Inspections	Identify risks, highlights failures in process and recommend corrective actions.
Walkaround check-sheets	Identifies and reports on potential plant failures that could impact on the environment if not addressed.
Preventative maintenance program	Routine maintenance of plant where failures impacting on the environment and productivity have been known to occur.
Audits	Identify risks and recommend corrective actions.
Incident/Hazard/Near Miss Reporting	Identify risks and recommend corrective actions. Identify training, work procedure and infrastructure improvement requirements. Essential to continual improvement.
Environmental Monitoring	Comply with license conditions. Monitor performance.
Change Management	Reduce risk posed by changes to process.
Emergency Plan	Reduce impact of emergencies on environment and business continuity. Reduce risks to human health/Safety.
Induction Training	Alert all employees and visitors to their environmental responsibilities.

Table 4: Administrative Controls implemented across HPP's NSW Operations.

Procedure for Internal and External Incident Reporting.

All incidents must be reported and investigated. Protocols have been developed to provide guidance on the level of environmental reporting as required under the POEO Act and Regulations. Complying with the PIRMP notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW.

Internal Incident Reporting.

All incidents, hazards and near misses must be reported under well-established reporting procedures utilizing a risk matrix. This provides all internal stakeholders with information regarding severity of a risk or incident and details corrective actions

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required. These procedures include a review system to ensure all corrective actions are completed.

External Incident Reporting.

The HPP incident notification procedure has been developed to provide specific direction for site-based personnel in the event of a loss of containment. Training to ensure each level of the business understands its obligations with regard to notification is completed annually and also forms part of the review process in the event the plan is activated.

The process involves the use of a wall chart (**Appendix 1**) notification assessment worksheet (**Appendix 2**) and notification protocol (**Appendix 3**).

The procedure and associated documentation provide clear guidelines for reporting to external parties and was developed to comply with the POEO Act and regulations.

Mechanisms for providing early warnings and updates to Neighbours.

If an incident has occurred that requires first response emergency services, all communication to external parties will be managed by the person authorised to activate the plan. Each site and incident will require a unique response regarding communication with residents adjacent to the site and subject to the incident, the following mechanisms may be used.

- Notification on website
- Twitter
- Facebook
- Telephone calls
- SMS
- Email to community representatives e.g. consultative committee.
- Letter box drops for updates.
- Door knock.
- Town meetings for updates.

Initial communication with neighbours will be completed in consultation with emergency service advice and directives such as evacuation.

Manner in which plan will be tested and maintained.

This PIRMP requires scheduled testing and maintenance to ensure the process remains current and incident response/notification is completed without delay. As a minimum, the following summary details the review requirements for this plan.

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- Review at least once every 12 months and after every incident.
 - Record annual review in Routine Activities of Site EHSR Improvement Plan.
 - Senior management sign off is required for annual review.
- Spill response training and drills every 12 months.
- Provide relevant training on regular basis.
- Amend this PIRMP and record details in Amendment Register.

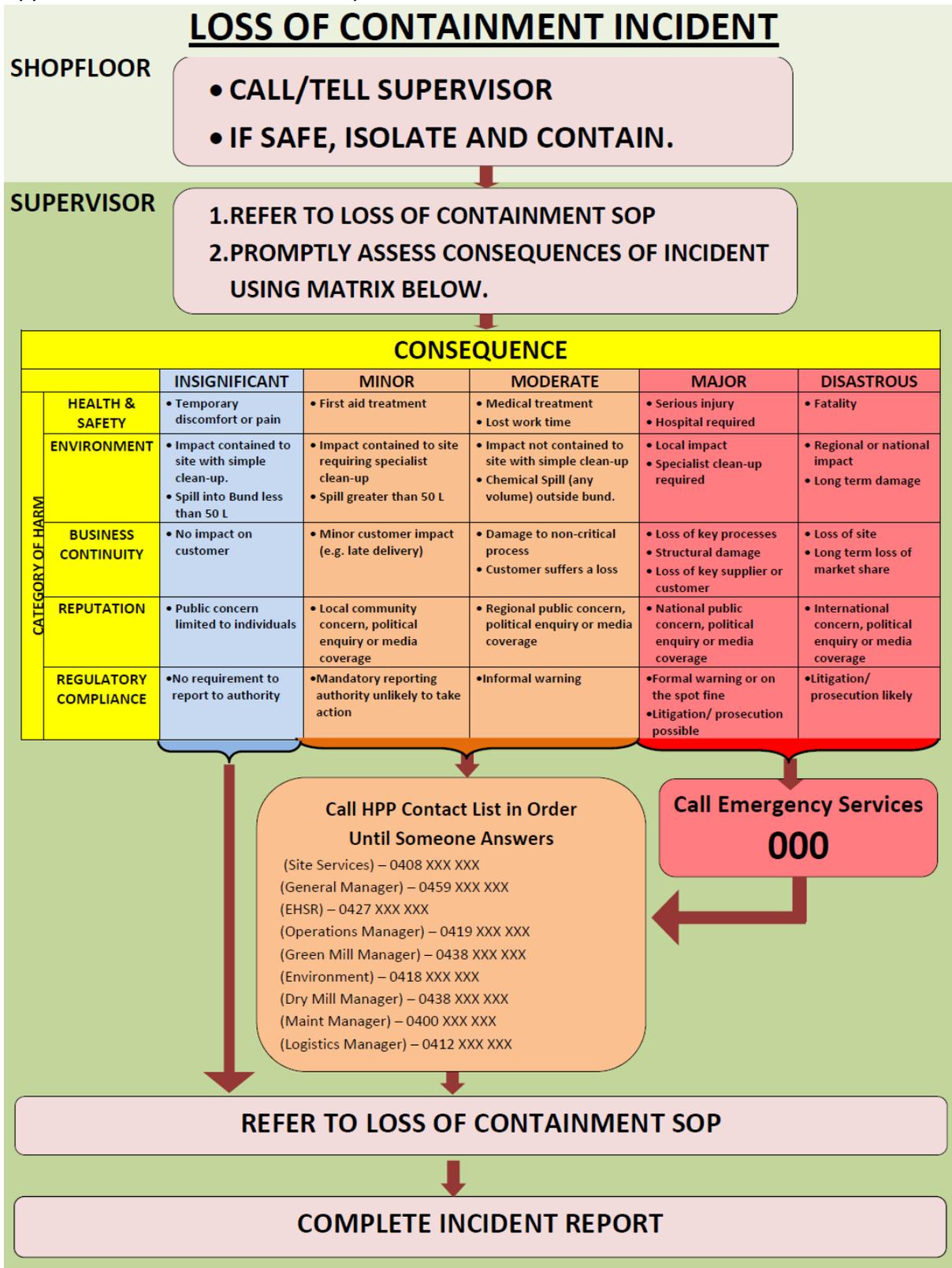
Task	Who	Frequency
Full review of plan including chemical risk assessment. Review must be documented.	Site EHSR, Engineering Dept, Production Dept. Site Manager	Annual
Post incident plan review.	Site EHSR, Engineering Dept, Production Dept. Site Manager	Within 30 days of this plan being activated.
Spill response training drills	All shop floor personnel	Annually
PIRMP responsibility training	All site personnel	Annually
PIRMP review signoff	Site Manager, Site EHSR	Annually
Amend register and update records	Site EHSR	Annually or as updates occur.

Table 5: PIRMP Testing and maintenance.

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Appendix 1: Pollution Incident Response Loss of Containment Wallchart



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Appendix 2: Notification Assessment Worksheet.

NOTIFICATION ASSESSMENT

Date	Time	Name	Incident Report Number
Description of Incident			

CONSEQUENCE(TICK THE BOX)						
		INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS
CATEGORY OF HARM	HEALTH & SAFETY	• Temporary discomfort or pain <input type="checkbox"/>	• First aid treatment <input type="checkbox"/>	• Medical treatment • Lost work time <input type="checkbox"/>	• Serious injury • Hospital required <input type="checkbox"/>	• Fatality <input type="checkbox"/>
	ENVIRONMENT	• Impact contained to site with simple clean-up • Spill into a bund less than 50 L <input type="checkbox"/>	• Impact contained to site requiring specialist clean-up. • Spill greater than 50 litres <input type="checkbox"/>	• Impact not contained to site requiring simple clean-up • Chemical spill (any volume) outside bund. <input type="checkbox"/>	• Local impact • Specialist clean-up required <input type="checkbox"/>	• Regional or national impact • Long term damage <input type="checkbox"/>
	BUSINESS CONTINUITY	• No impact on customer <input type="checkbox"/>	• Minor customer impact (e.g. late delivery) <input type="checkbox"/>	• Damage to non-critical process • Customer suffers a loss <input type="checkbox"/>	• Loss of key processes • Structural damage • Loss of key supplier or customer <input type="checkbox"/>	• Loss of site • Long term loss of market share <input type="checkbox"/>
	REPUTATION	• Public concern limited to individuals <input type="checkbox"/>	• Local community concern, political enquiry or media coverage <input type="checkbox"/>	• Regional public concern, political enquiry or media coverage <input type="checkbox"/>	• National public concern, political enquiry or media coverage <input type="checkbox"/>	• International concern, political enquiry or media coverage <input type="checkbox"/>
	REGULATORY COMPLIANCE	• No requirement to report to authority <input type="checkbox"/>	• Mandatory reporting authority unlikely to take action <input type="checkbox"/>	• Informal warning <input type="checkbox"/>	• Formal warning or on the spot fine • Litigation/prosecution possible <input type="checkbox"/>	• Litigation/prosecution likely <input type="checkbox"/>

FILL IN THE WHITE BOXES			
Cost of material lost			Estimated Cost \$
Oil (any type)	L	X	\$10.00/L
Liquid wastes (Non-H2)	L	X	\$10.00/L
H2 Liquid Wastes	L	X	\$200.00/L
Boiler Chemicals	L	X	\$20.00/L
Fuel	L	X	\$10.00/L
Chip/dust	T	X	\$105.00/T
Waste Water	L	X	\$10.00/L
H2 Treatment Chems	L	X	\$200.00/L
What critical process went down?			
	Hrs	Down	X \$1250
What non-critical process went down?			
	Hrs	Down	X \$250
Clean up			
	Hrs	X	Men X \$50
Sucker truck		Hrs	X \$180
spill kits x \$700			half kits x \$350
Waste disposal			
Tip fees		M3	X \$100
Special disposal		T	X \$200
Waste testing	1		X \$500
Total Cost =			

CALLS MADE CHECKLIST (FILL IN THE WHITE BOXES)		
AUTHORITY	CALLED	REFERENCE NO.
No call necessary	<input type="checkbox"/>	NA
Emergency Services 000	<input type="checkbox"/>	
Fire & Rescue NSW	<input type="checkbox"/>	
EPA	<input type="checkbox"/>	
Health Department	<input type="checkbox"/>	
Safework NSW	<input type="checkbox"/>	
Local Council	<input type="checkbox"/>	

WHAT TO TELL AUTHORITIES (KEEP TO THE FACTS)
<ul style="list-style-type: none"> • Time • Date • Location – site address • Environment Protection Licence Number (EPL) • Nature of Issue – fire, spill etc • Quantity of material lost • Other relevant information known at the time.

EPL Numbers HPP1 – 887 HPP2 – 11229 LOSP – 105

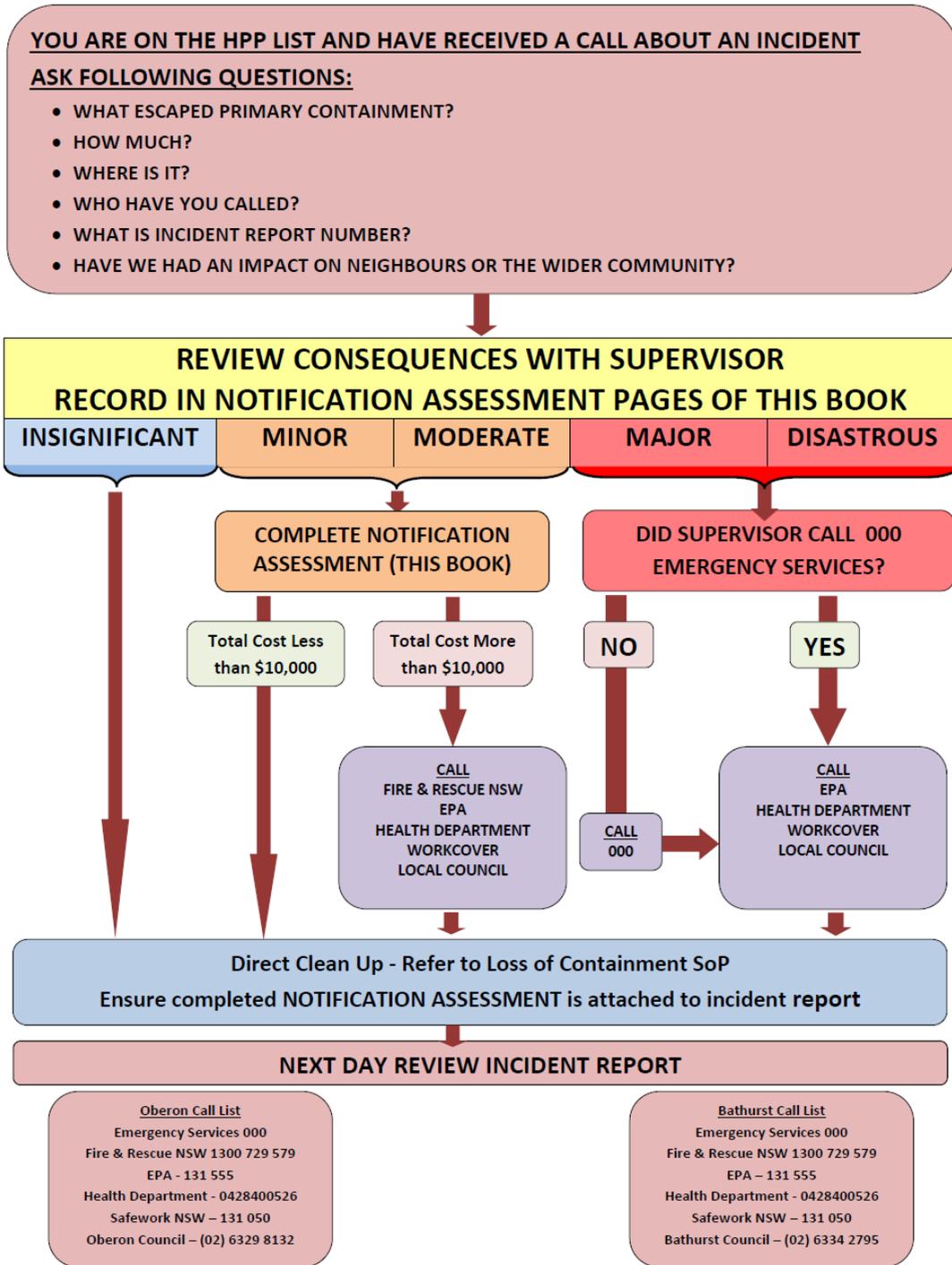
This estimation tool provides guidance when assessing potential cost of an incident. Signed: _____

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Appendix 3: Notification Assessment Protocol.

NOTIFICATION ASSESSMENT



Safely Home – Every Day

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