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Pollution Incident Response Management Plan

BATHURST TIMBER

Version Two: 7th August 2023

1. DOCUMENT CONTROL SHEET

Ver.	Date	Prepared by	Approved By	Revision Details
01	21 Aug 2022	Rod Johnson	Rod Johnson	Document Created
02	7 Aug 2023	Chris Brown	Chris Brown	Update contacts Added Incident #1

Current Ver.	Date Implemented	PIRMP Test Schedule	Date for Next Review
02	Aug 2023	12 months	Aug 2024

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1. PURPOSE

The purpose of the Bathurst Timber Pollution Incident Response Plan is to:

- Provide direction to the staff at Bathurst Timber in responding to pollution incidents at the Bathurst operations;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Bathurst Regional Council, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident at Bathurst Timber by identifying key risks and planned actions to minimise and manage those risks;
- Detail the training requirements for this plan, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

2. LEGISLATIVE REQUIREMENTS

The specific requirements for a PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).
- if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act)

3. DEFINITION OF 'POLLUTION INCIDENT'

The definition of a pollution incident is:

“pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

- a) harm to the environment is material if:
 - i. 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
- b) 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.

Bathurst Timber is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

4. SCOPE

This PIRMP must be followed by employees, contractors and visitors of Bathurst Timber, to assist in the early response to and reporting of a pollution incident.

5. POTENTIAL POLLUTING SUBSTANCES

The main hazards to human health and the environment at Bathurst Timber are included in the following table.

It is important to note that Bathurst Timber is currently in caretaker mode, in preparation for rehabilitation and possible divestment. No production has taken place at Bathurst Timber. The details recorded in the below tables will be updated routinely inline with any changes in the management of the operation and the closure/rehabilitation procedure of the site.

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment)							
Site Name: Bathurst Timber					Responsible Person: Operations Manager		Date: 7/8/2023
Name / description	Covered under Haz Chemicals/MSDS?	Amount stored	Location of storage	Map reference	Need for early warning ¹	Current controls	See Risk Ass & PIRMP Response Action (see Below)
CHEMICALS/FUELS/LUBRICANTS (raw materials and products which can cause pollution)							
There are currently no chemicals stored at the Bathurst Timber site. The site is in a Care and maintenance mode, with no production or operations occurring							
MATERIALS (eg stockpiles, silos, bulk solids etc)							
There are currently no materials stored at the Bathurst Timber site. The site is in a Care and maintenance mode, with no production or operations occurring							

¹ Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

Storm Water Drains							
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6. ROLES AND RESPONSIBILITIES

Position	Responsibility
<i>Employees and Contractors</i>	<p>Following the procedures outlined in the PIRMP and related documents</p> <p>Immediately alerting Supervisor or Team Leader of any environmental incidents or near-misses.</p>
<i>Team Leaders / Front Line Supervisors</i>	<p>Following the procedures outlined in the PIRMP and related documents</p> <p>Immediately alerting Site Manager or, in case of their unavailability, Environmental Representative or Environment Manager of any potentially material environmental incidents or near-misses.</p> <p>Conducting incident investigations.</p>
<i>Site / Operations Manager and/or Site Environmental Coordinator and/or Environment Manager</i>	<p>Authorisation of the PIRMP Administration, maintenance and implementation of the PIRMP</p> <p>Assessing whether the incident has caused or threatens “material environmental harm” and, if so, immediately notifying all Appropriate Regulatory Authorities.</p> <p>Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact.</p>

7. INTERNAL POLLUTION INCIDENT REPORTING

Any pollution incident satisfying the **material harm** threshold must be immediately reported to relevant statutory authorities by either the Site/Operations Manager, or Environment Manager.

In cases where “material harm” level cannot be immediately assessed or insufficient information comes to hand on the severity of the incident, the general advice is to err on the side of caution and notify the Relevant Authorities with a qualification that the situation could not yet be fully assessed.

Until further notice the following procedure needs to be followed:

1. When a pollution incident occurs, a person who has become aware of it must immediately bring it to the attention of his/her immediate Supervisor or Manager
2. If necessary, first ring “ 000 ” for Emergency Services
3. At least one of the following BCM personnel must be contacted **immediately**:

Whilst personal contact details for the following are available in the Controlled on site Pollution Incident Response Management Plan they do not appear in this public document.

Name	Function	Phone number	Mobile number
	Head of Property (operations manager)		
	HS Business Partner		
	Senior E Business Partner		

4. The Operations Manager or in case of there unavailability one of the Senior Management personnel listed above, is to **immediately** notify all Appropriate Regulatory Authorities specified in Section 4.3.
5. In borderline situations, where the exceedance of the trigger level of “material harm” of a pollution incident may not be clear, a quick assessment including consultation with Boral environmental personnel should be undertaken to help the decision whether to notify or not.
6. Boral’s Senior Management must be informed promptly of the fact of immediate notification to the Authorities. This includes environmental personnel listed above, as well as [REDACTED]

8. EXTERNAL POLLUTION INCIDENT REPORTING

As the legislation requires that notification must be done immediately upon becoming aware of the pollution incident, it is unlikely that a detailed picture will be available for reporting. Notwithstanding, it seems that some of the Government Authorities prepared a detailed questionnaire which is being filled at the time of this initial notification. Under the stress of incident handling it could be easy to provide a hasty, inaccurate estimate of the situation when answering these questions.

Therefore, the notification should be restricted to the facts known and nothing should be assumed or guessed. The details will be provided to the asking Authority later when more information comes to hand.

The initial notification should include as much of the following information (if known) as possible:

- location and time of the pollution incident
- type of the incident (spill, fire, unlicensed harmful discharge, etc)
- assessed level of incident gravity: “it seems to be...” (e.g. “a relatively minor spill”; “major fire”, “explosion limited to one building”, etc.)
- whether the Emergency Services have been required to attend.

Unless known for a fact, the answers to other questions should be politely deferred until a better assessment of the situation can be made.

The Boral person who is responsible for notifying the Authorities (Site/Operations Manager or Environment Manager) about the incident must prepare a Notification Log (a suitable form is attached) with the details of time of notifications and the persons who took to the call. The Authorities are expected to log the calls but early indications are that this is not always the case.

Notification of all Appropriate Government Authorities (at least 5 entities) may take considerable time. Delays may be experienced connecting to the right person or no contact may be possible after hours. All such instances should be recorded in the Notification Log.

9. POLLUTION INCIDENT AUTHORITY CONTACT LIST

Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Bathurst Regional Council	02 6333 6111
Public Health Unit (Bathurst Health Service)	02 6330 5000 (Diverts to Public Health Officer on Call)
WorkCover Authority of NSW	131050 Company ABN if asked: 51 000 187 002
Government Authority - ring if relevant	Emergency notification phone number
Police & Ambulance	000
Roads and Maritime Services (road spills)	132 701
NSW Office of Water	8838 7885
Bush Fire Control Officer	1800 049 933
Poisons Information Centre	131 126
Essential Energy (power line emergencies)	13 20 80

Communication with the local community may also be undertaken depending on the circumstances of the pollution incident. Bathurst Timber would consider the following options for providing Early Warning and ongoing information to the community on pollution incidents:

- Direct phone contact with any local residents directly impacted by the pollution incident
- Letter Box drops of incident information and site contacts to local residents impacted by the pollution incident
- The inclusion of incident details within the relevant Community Newsletter

The Stakeholder Relations Manager can assist in the process of communicating with the community, as per the Stakeholder Engagement Plan for the site.

10. INCIDENT RESPONSE TRAINING

Bathurst Timber will implement the Pollution Incident Response Management Plan by training or providing information to relevant employees and contractors in relevant areas of the Plan.

Training or information will be provided on the following;

- The contents and intent of this PIRMP,
- The roles and responsibilities of site staff in relation to this PIRMP
- Spill response procedures;
- General environmental awareness; and / or
- Hazardous materials awareness.

11. PIRMP AUDIT

The objectives of an audit are to maintain compliance with this plan. Internal audits of this Plan will be undertaken every 3 years.

Routine testing of the plan will be conducted annually, and can be completed through the following methods:

- Simulated environmental emergency, or
- Desktop simulations.

12. PIRMP REVIEW

Revisions are to be coordinated by the Site Manager and Environmental Representative.

The objectives of a review are:

- To maintain compliance with the statutory requirements, and
- To identify opportunities for improvement in the Plan, and reduce the risk to human health and the environment

12.1. EVENT BASED

Events which may trigger a review of this Plan or its associated documents include:

- Within 1 month of reporting to the nominated parties in accordance with the plan, after a pollution incident, or
- Modification/Improvement to the system

12.2. TIME BASED

Bathurst Timber will review this management plan routinely every 12 months. The Plan review will include:

- This Document, and
- Legislation, Approval and Licence changes.

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APPENDIX 1 – RISK ASSESSMENT on POTENTIAL IMPACTS

Hazard and Likelihood Risk Assessment and Corrective Control Measures

Site: Bathurst Timber			Responsible Person: Operations Manager			Review Date: 7th August 2023		
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Likely hood	Risk	Impact on neighbours ²	Control Measures Corrective Action Coverage under other Plans	Responsible person	Action date
Smoke	Incident #1 Excessive smoke/odour as a result of infrastructure or equipment fire causing significant and unexpected impact to the community	1	1	Low	N/A	Consequence: (minor) smoke/odour would be visible but due to distance to the nearest receivers would have little impact. Likelihood: (unlikely) fire fighting controls are in place in the operations and staff have been trained in fire fighting response. Maintenance schedule in place to ensure process and fire fighting equipment are in good working order. Emergency response training for Boral staff in place including fire response.	As per PIRMP action plan	When required

² If the incident may impact on neighbours then it will need to trigger the early warnings assessment and actions

APPENDIX 2 – PIRMP RESPONSE ACTIONS

Incident No 1

Incident #1	<p>Excessive smoke/odour as a result of infrastructure fire causing significant and unexpected impact to the community</p> <p>Actions Required:</p> <ul style="list-style-type: none"> • Employees, Contractor/Visitor to notify operations manager of issue immediately. • Area to be restricted to Incident Response Personnel • Affected neighbours to be alerted immediately • Emergency response plan to be activated as necessary including firefighting if possible or calling Emergency Services • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
Alarm raising	Any personnel involved or witnessing incident to report to operations manager and PIRMP actions to be implemented.
Emergency Controller	Operations manager or delegate
Scale of incident	Incident would be localised to the storage shed area with minimal external impact. Impact would be visual due to smoke
Evacuate	Advice to be provided by Fire Dept as part of attendance after immediate notification. No external evacuation required unless potential for explosion or for expansion of the fire, or if wind has the potential to carry smoke/odour to neighboring residences.
Communications	<p>Internal:</p> <ul style="list-style-type: none"> • Operations manager to use contact sheet for all internal (Boral) contacts <p>External mandatory:</p> <ul style="list-style-type: none"> • Immediate Reporting Contact Sheet to be used <p>External non-mandatory:</p> <ul style="list-style-type: none"> • Contact neighbors affected
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Burnt and damaged materials to be disposed externally and recycled if possible.
Reporting and re-preparedness	See SOPs:

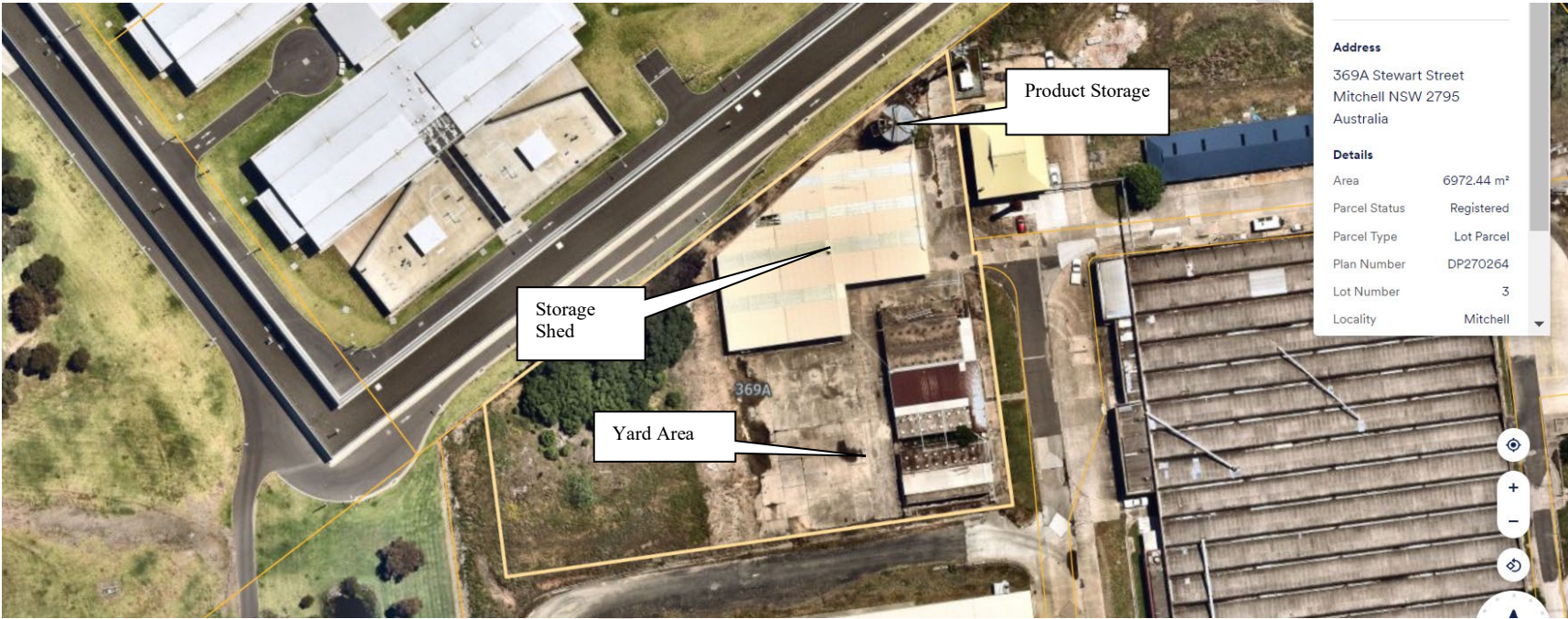
	<ul style="list-style-type: none">• Incident Notification SOP GRP-HSEQ-3-02Incident_Reporting_Investigation_and_Action_Management v3.2.pdf• Review of PIRMP• Review of relevant Management plan• Reporting as per Conditions of consent• Reporting as per EPL
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APPENDIX 3 – BATHURST TIMBER LOCATION MAP



APPENDIX 4 – BATHURST TIMBER REFERENCE MAP



APPENDIX 5 – BATHURST TIMBER – MAP OF AFFECTED AREAS



APPENDIX 6 – Pollution Incident Notification Log

Person undertaking notification (Name/Function):		
Date and time when first become aware of the incident:		
Incident type:		
Comments:		

Initial immediate notification log				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of initial communication:				

Person undertaking notification (Name/Function):		
Date and time when additional information become available:		
Comments:		

Immediate notification of further pertinent information (if applicable)				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of additional communication				

APPENDIX 7 – BATHURST TIMBER PIRMP – Immediate Reporting Contact Sheet

Whilst personal contact details for the following are available in the Controlled on site Pollution Incident Response Management Plan they do not appear in this public document.

Internal Reporting:			
Name	Function	Phone number	Mobile number
	Head of Property (operations manager)		
	HS Business Partner		
	Senior E Business Partner		

External Reporting:	
Emergency Services / Government Authority	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Bathurst Regional Council	02 6333 6111
Public Health Unit (Bathurst Health Service)	02 6330 5000 (Diverts to Public Health Officer on Call)
WorkCover Authority of NSW	131050 Company ABN if asked: 51 000 187 002

Refer to the Bathurst Timber PIRMP for other potentially relevant contact numbers.

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