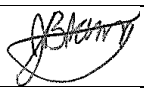

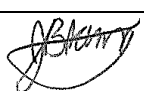


POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

PINE HILL

48 - 54 GILHOLMES ROAD, OBERON

Document Control

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Pine Hill

Pollution Incident Response Management Plan

A Pollution Incident Response Management Plan (PIRMP) must be prepared for all Projects based in NSW that hold an Environmental Protection Licence (EPL), or for any project if directed to prepare one by the EPA. This PIRMP has been prepared for Plantation Pine Products Pine Hill quarry premises which holds EPL 20946.

It is a requirement under Clause 98D of the Protection of the Environment Operation Amendment Regulations 2009 that certain sections of the Plan are made publicly available on a website within 14 days after being prepared and approved for issue/use, or if the licensee does not have a website, provide a copy of the Plan, without charge, to any person who makes a written request. The latter applies to Pine Hill. The sections are those that cover procedures for contacting the relevant authorities and the local community, and mechanisms for providing early warnings and regular updates to premises in the vicinity.

The objective of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority and other relevant authorities specified in the POEO Act (such as local Councils, NSW Ministry for Health, SafeWork NSW, and Fire and Rescue Services NSW), and people outside the project who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident associated with the premises by identifying risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for enacting it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

1. External Notification Protocol

The authorities listed in Table 1 must be contacted in the order below immediately for pollution incidents that threaten or cause material harm to the environment.

Table 1 External Notification Protocol

Authority	Phone Number
Emergency Services – Fire and Rescue NSW Police NSW Ambulance Service	000*
*Only ring 000 if the incident presents an immediate threat to human health or property and requires Emergency Services. If the incident does not require an initial combat agency or once the 000 call has been made, notify as listed below	
EPA Pollution Hotline	131 555
Ministry of Health – Oberon District Hospital	6336 7200
SafeWork NSW	131 050
Local Authority – Oberon Council	6329 8100
Fire and Rescue NSW	6336 0331 (when HAZMAT not required)

When notifying authorities that a pollution incident has occurred, the following information must be provided:

1. The time, date, nature, duration and location of the incident
2. The location of the place where pollution is occurring or is likely to occur
3. The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
4. The circumstances in which the incident occurred (including the cause of the incident, if known)
5. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If information required in items 3, 4 and 5 are not known when the initial notification is made but becomes known afterwards, that information must be provided to the authority immediately after it becomes known.

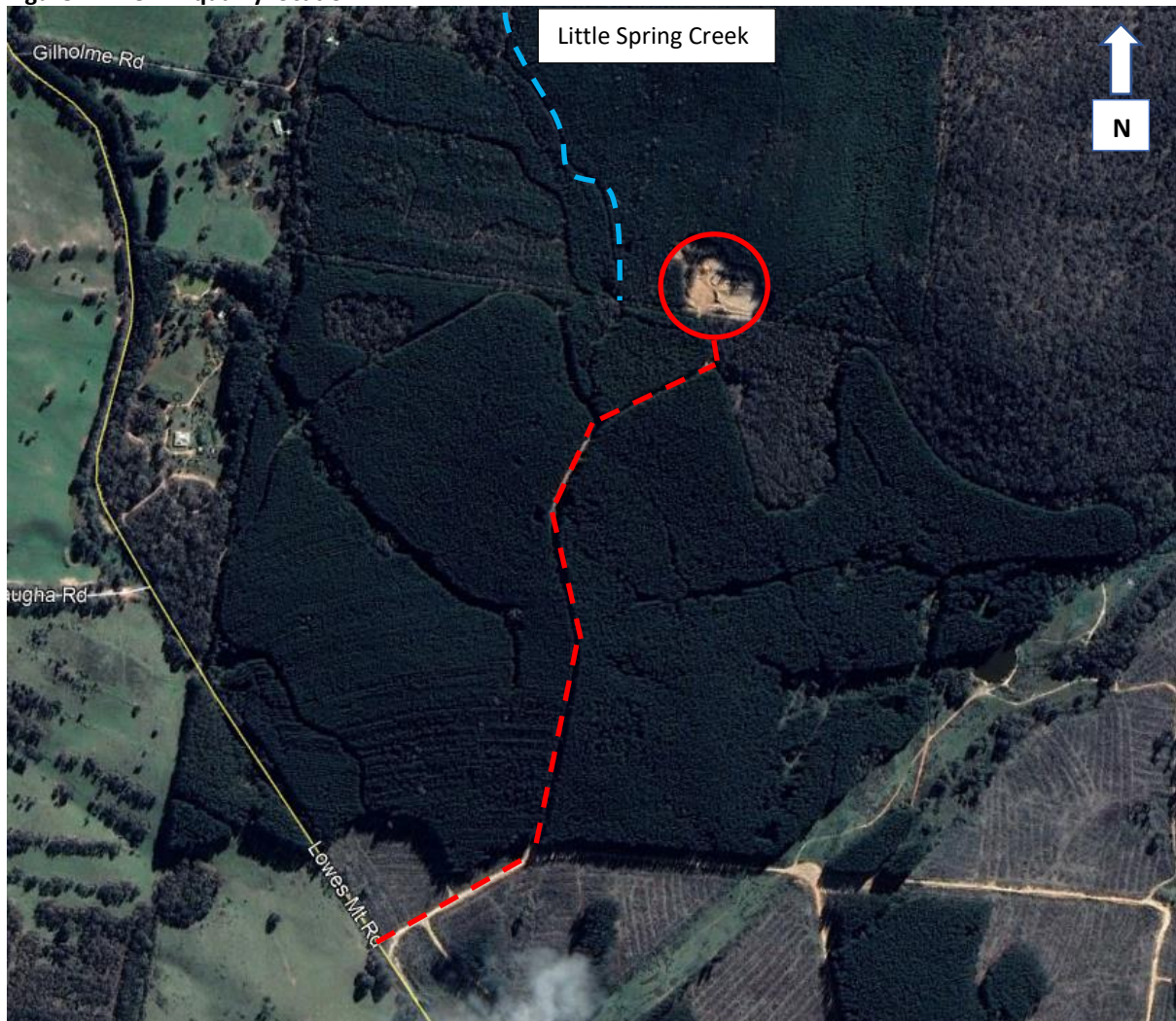
2. Community Notification & Action Protocol

Notification to any premises that may be affected by the pollution incident may include the following:

1. Details of the pollution incident and extent of impact (as known at the time)
2. Safety warnings and recommendations to prevent/minimise impacts, if required
3. Potential impacts on the operation of local businesses, if required.

In the event of a pollution incident which has the potential to impact the local community, the Site Operator will immediately notify the Site Manager who will determine if community notification is required. Figure 1 shows the site location. Figure 2 shows adjacent land ownership and residences.

Figure 1 Pine Hill quarry location



--- Quarry Access Track off Lowes Mount Road

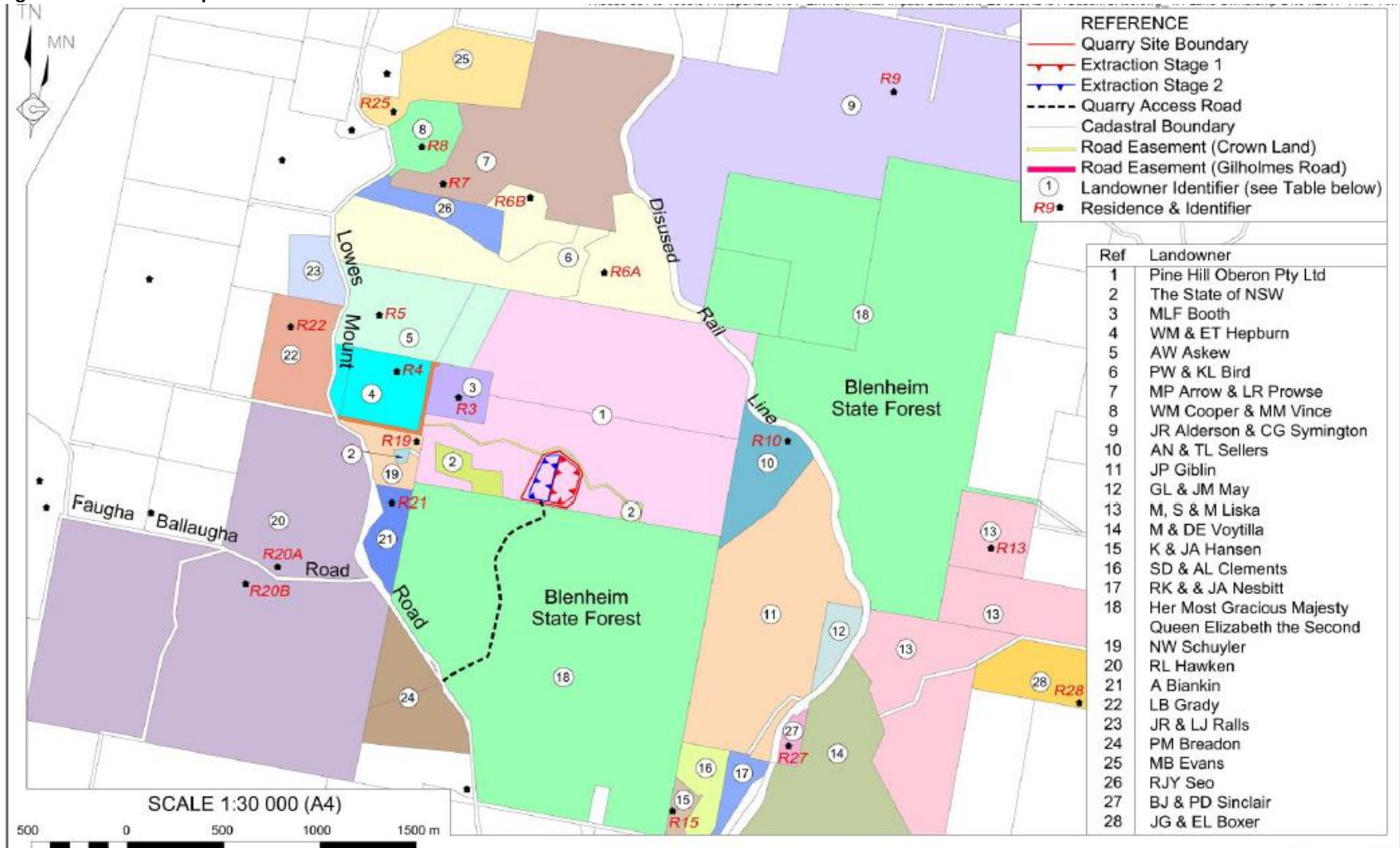
Figure 2 Land ownership and residences


Table 2 lists the mechanisms to be followed in the event that a pollution incident has the potential to impact the community/surrounding receivers, in order to minimise the risk of harm.

Table 2 Community Notification and Action Protocol

Scenario	Potential Impacts	What to do (response)	Who to Notify	When to Notify	Communication Mechanism
Sediment laden water/silt leaving site from sediment basin	Pollution to land Pollution to watercourse (Little Spring Creek)	Using excavator, dam up basin and place soil to stop any further release	EPA Oberon Council	Immediately after controlling/stopping the discharge	Phone
Hydrocarbon/hydraulic fluid leak Hydrocarbon spill during refuelling activities	Pollution to land	Control/stop and contain leak/spill Place absorbent material from spill kit to spill/leak If potential for fluid/fuel to go off site, use excavator to create earthen bund to contain on site	EPA Oberon Council	When off-site pollution occurs, during clean up	Phone
Dust leaving site causing nuisance from extractive, loading, crushing, grinding, separating activities	Air quality issues Loss of amenity Community complaints	Cease works immediately especially where weather conditions are unfavourable (windy and /or dry conditions) Use water from sed basin as dust suppression Use water cart as required for dust suppression Mobile crushing plant to be located in extraction area as identified on the site plan which provides topographical shielding	EPA Oberon Council Adjacent residences if excessive and likely to affect them	When off-site pollution occurs, immediately after becoming aware	Phone Door knock

Scenario	Potential Impacts	What to do (response)	Who to Notify	When to Notify	Communication Mechanism
		All trucks entering or exiting the quarry that are carrying loads of dust generating materials must have their loads covered			
Bush fire resultant from site activities	Air quality issues Loss of amenity Community complaints	Cease works immediately Attempt firefighting with fire extinguisher/portable pump if capable and confident, and safe to do so	Fire & Rescue NSW Oberon Council EPA SafeWork NSW Adjacent residences (see Figure 2)	Immediately after becoming aware of incident	Phone Door knock

3. Definition of a Pollution Incident

A pollution incident that requires notification to authorities is defined in section 147 of the *Protection of the Environment Operations Act 1997* 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) If 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.

Note: anyone on site can activate the PIRMP though external notification is the responsibility of Management

4. Hazard Identification & Pre-emptive Measures

The environmental management plans developed for Pine Hill identify environmental aspects of the site including potential hazards and management measures to be employed relevant to pollution including soil and water, air quality, and bush fire management.

Table 3 lists the main potential hazards and Table 4 provides a risk assessment of these hazards and include applicable pre-emptive measures. Refer to *Site Emergency Plan* for actions and arrangements to minimise the risk of harm to any persons on the premise should an incident occur. This includes identification of muster points, evacuation procedures and immediate actions to be taken in the event of an emergency or an environmental incident.

Table 3 Hazard Identification

Aspect	Hazards
Soil & Water	Refuelling activities Plant service activities Hydraulic fluids Oil/grease Fuel Extractive activities increasing the risk of erosion and sedimentation Poor management of site surface water/stormwater system Adverse weather conditions
Waste	<u>Liquid waste:</u> Fuels, oils, greases, engine coolant <u>Hazardous waste:</u> Lubricants <u>General Solid Waste:</u> Non-recyclable and other putrescible general solid waste Drained (and crushed) oil filters, rags and other absorbent material that do not contain free liquid Sediment from sediment basins
Air	Dust Smoke/fire Adverse weather conditions

Table 4 Risk Assessment

Hazard	Impact (Human Health &/or Environment)	Inherited Risk Level	Pre-emptive Actions	Residual Risk Level
Off-site silt displacement including mud tracking onto public roadways Likelihood increased during wet weather	Environment	18 EXTREME	<ul style="list-style-type: none"> - stabilised access/egress point - surface water/stormwater management system consisting of swales and sediment basins - silt fence to sections of quarry boundary and stockpiles as required/as works progress - operations will cease during wet weather 	5 LOW
Uncontrolled off-site discharge from sediment basin Likelihood increased during wet weather	Environment	18 EXTREME	<ul style="list-style-type: none"> - monitoring of meteorological conditions (Borg Panels weather station) - monitoring of weather forecasts for rain events (BOM) - regular inspection (at least weekly) of basin to check capacity and discharge in accordance with EPL 20946 if required 	
Pollution of land or water from hydrocarbon spills/leaks from machinery during refuelling or servicing, from site stored fuel	Human Health &/or Environment	17 HIGH	<ul style="list-style-type: none"> - plant hazard assessment conducted - regular plant checks - refuelling truck to attend site as necessary - maintenance/service to plant undertaken by mobile service unit - Maximum 2 x 20L fuel/jerry cans stored on site in a bund - adequately stocked spill kit 	9 MEDIUM
Generation of dust from excavator, mobile crushing equipment, trucks, vehicles or exposed areas	Human Health &/or Environment	17 HIGH	<ul style="list-style-type: none"> - traffic movements restricted to 15km/hr on site (unless sign posted otherwise) - dust suppression on site, water cart and/or pump for sed basin water - loaded trucks entering or exiting site to have loads covered 	5 LOW
Bushfire ignited by employee behaviour (i.e. smoking), spark from vehicle or mobile plant	Human Health & Environment	13 HIGH	<ul style="list-style-type: none"> - no smoking policy on site - plant hazard assessment conducted - regular plant checks - all vehicles and mobile plant fitted with fire extinguishers - Quarry personnel to undergo specific fire management/response training - all service/maintenance/refuelling undertaken within laydown area shown on site map with vehicle/plant turned off - <i>Site Emergency Plan</i> 	9 MEDIUM

Table 5 Risk Assessment Matrix

		POTENTIAL CONSEQUENCE				
		INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS
CATEGORY OF HARM	HEALTH & SAFETY →	<ul style="list-style-type: none"> • Temporary discomfort or pain 	<ul style="list-style-type: none"> • First aid treatment 	<ul style="list-style-type: none"> • <i>Medical treatment</i> • <i>Lost work time</i> 	<ul style="list-style-type: none"> • <i>Serious injury (amputation, admittance to hospital, permanent loss of body function)</i> 	<ul style="list-style-type: none"> • <i>Fatality</i>
	ENVIRONMENT →	<ul style="list-style-type: none"> • No adverse impact (e.g. appearance issue only) 	<ul style="list-style-type: none"> • Impact contained to site with simple clean-up process 	<ul style="list-style-type: none"> • Impact contained to site requiring specialist clean-up 	<i>Hazard may be "Significant"</i>	
	BUSINESS CONTINUITY →	<ul style="list-style-type: none"> • Process disruption, no impact on customer 	<ul style="list-style-type: none"> • Process disruption with minor customer impact (e.g. late delivery) 	<ul style="list-style-type: none"> • Damage to non-critical process (e.g. can transfer work to another process) • Customer inconvenienced (e.g. customer suffers a loss) 	<ul style="list-style-type: none"> • Significant local environmental impact • Specialist clean-up required 	<ul style="list-style-type: none"> • Environmental impact of regional or national significance • Long term damage
	REPUTATION →	<ul style="list-style-type: none"> • Public concern limited to individuals • No broader political concern or media coverage 	<ul style="list-style-type: none"> • Local community concern, political enquiry or media coverage 	<ul style="list-style-type: none"> • Regional public concern, political enquiry or media coverage 	<ul style="list-style-type: none"> • Loss of key processes • Structural damage to facilities • Loss of key supplier or customer • Financial loss >\$500k 	<ul style="list-style-type: none"> • Effective loss of site • Long term loss of market share
	REGULATORY COMPLIANCE →	<ul style="list-style-type: none"> • No requirement to report to authority 	<ul style="list-style-type: none"> • Mandatory reporting but authority unlikely to take any action 	<ul style="list-style-type: none"> • Authority likely to give informal warning 	<ul style="list-style-type: none"> • National public concern, political enquiry or media coverage • Reduced ability to obtain capital or insurance 	<ul style="list-style-type: none"> • International public concern, political enquiry or media coverage • Reduced company or brand market value
		<ul style="list-style-type: none"> • No requirement to report to authority 		<ul style="list-style-type: none"> • Authority likely to give formal warning or on the spot fine • Litigation/ prosecution possible 	<ul style="list-style-type: none"> • Litigation/ prosecution likely 	

LIKELIHOOD	<u>ALMOST CERTAIN</u> >99% probability, or is expected to occur in most circumstances, or could occur within days to weeks, or will occur repeatedly without corrective action	11 HIGH	16 HIGH	20 EXTREME	23 EXTREME	25 EXTREME
	<u>LIKELY</u> 50-99% probability, or will probably occur in most circumstances, or could occur within weeks to months	7 MEDIUM	12 HIGH	17 HIGH	21 EXTREME	24 EXTREME
	<u>POSSIBLE</u> 20-50% probability, or should occur at some time, or could occur within months to years	4 LOW	8 MEDIUM	13 HIGH	18 EXTREME	22 EXTREME
	<u>UNLIKELY</u> 1-20% probability, or could occur but would not be expected, or could occur in years to decades	2 LOW	5 LOW	9 MEDIUM	14 HIGH	19 EXTREME
	<u>EXTREMELY UNLIKELY</u> <1% probability, or may occur but only in exceptional circumstances, or only occur as a 100 year event	1 LOW	3 LOW	6 MEDIUM	10 HIGH	15 HIGH

5. Contact Details & Notification Protocol

Table 6 below provides information for key personal who are responsible for managing the response to a pollution incident on site, and those who are authorised to notify the relevant authorities as noted above in Table 1 External Notification Protocol.

Table 6 Contact Details & Level of Authority

Name	Position	Phone Number	Notify Authorities (Y/N)
Zac Kay	Chief Warden	0400 346 151	*Y
Levi Yates	Site Manager/Deputy Warden	0488 037 441	*Y
Nathan Booth	Site Supervisor	0457 462 107	N
Jacqueline Blomberg	Environmental Manager	0436 609 556	*Y
Victor Bendevski	Environment and Regulatory Compliance	0410 327 635	Y

***Consult with Environmental and Regulatory Compliance prior to EPA notification**

In the event that a potential pollution incident has occurred, the person who discovered this is to take charge until relieved by more senior employee or emergency services personnel.

Appendix 1 Notification of Incident and First Response is the on-site 'Go-To' information sheet for activating the PIRMP. This is located on site in the site shed.

Two-way radios are in all plant on site. In the event of a pollution incident or where an evacuation is necessary, the operator can communicate via channel 25.

Mechanisms used to communicate with the public to provide, where possible, early warning of and following a pollution event that has the potential to impact the surrounding community can be found above in Section 2 and Table 2. These mechanisms will also be used to regularly update those affected by an incident.

6. Inventory

Table 7 provides for information on potential pollutants at the site.

Table 7 Pollution Inventory

Potential Pollutant	Location on site	Type of containment	Maximum quantity on site
Sediment laden surface water/stormwater	All exposed areas	Surface water management system including sediment basin, runoff diversion swales to the sediment basin	400m ³
Sediment/silt	All exposed areas	Silt fence on downslope of mobile crushing area and any stockpiles intended to remain on site for >10 days Stabilised/graded site access/egress point	N/A
Diesel	Site shed	Bund	2x20L jerry cans

7. Pollution Incident Response Scenarios

Pollution incident response scenarios are included in *Site Emergency Plan Pine Hill* under Types of Emergencies.

Fire – refer to section 8.2 Fire and Smoke

Spills or Releases – refer to section 8.8 Spill

Pine Hill also maintains a *Bush Fire Management Plan*.

8. Safety Equipment

Safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident including bushfire at Pine Hill are listed in Table 8 below. In the event that additional plant or equipment is required, the Site Operator is to contact the Site Manager who will bring these from Borg Panels (approx. 5km from Pine Hill quarry).

Table 8 Safety Equipment & Storage Locations

Equipment	Located
Fully stocked 120L spill kit	Site Shed
Water cart	Borg Panels
SDS	Site Shed
Excavator	Site plant
Fire extinguishers	Site Shed Excavator
Water pump and hose	Borg Panels
Metal shovels	Site Shed
Metal rakes	Site Shed

The Borg chemical management system will be used for Pine Hill as there will be no unique substances stored or used on site other than that which is currently used and stored on the Borg Panels site (i.e. diesel). Soft copies of Safety Data Sheets and Chemical Risk Assessments are maintained on Borg SharePoint/Oberon Intranet, Substances Register and ChemAlert. Hard copies of SDS's and Chemical Risk Assessments will also be stored on site in a folder in the site shed.

The spill kit located next to the site shed is identified as a LIME GREEN wheelie bin. In the event of a significant spill, immediately use the excavator to create an earthen bund to contain the spill and notify the Site Manager.

9. Site Map

Appendix 2 Site Environmental Maps shows the extraction stages at the quarry and location of site pollution/incident controls and includes stormwater/surface water system comprising swales, sediment basins and sediment controls.

These maps are displayed in the site shed.

10. Training

Details regarding the nature and objectives of any staff competence, training and awareness are outlined in *Site Emergency Plan*. Several forms of environmental training will be provided. Examples include:

- A site induction, including environmental roles and responsibilities;
- Toolbox talks;
- Environmental Awareness Training for specific issues;
- Truck Drivers Code of Conduct
- Safe Operating Procedures; and
- Job Safety Analysis.

Training records are maintained on the electronic management system.

11. PIRMP Testing & Review

The testing of this plan shall be carried out in such a manner as to ensure that the information included in this plan is accurate and up to date, and the plan is capable of being implemented in a workable and effective manner. Any such test is to be carried out:

- Routinely at least once every 12 months, and
- Within one month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether 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.

Testing of the PIRMP will cover all components of the plan, including the effectiveness of training and will involve:

- Desktop simulation; and
- Practical exercise or drill.

PINE HILL

PIRMP Appendix 1: Notification of Incident and First Response

Activating the PIRMP is required when a leak, spill or escape of a substance including uncontrolled discharge from the sediment basin or smoke which has caused, is causing, or is likely to cause pollution. Anyone can activate the PIRMP (Observer) where this is observed or is otherwise notified. This flowchart is to be followed immediately upon identification of a potential or actual pollution incident.

IMMEDIATE ACTIONS	<ul style="list-style-type: none"> •OBTAIN SAFETY DATA SHEET – this will let you know any danger to yourself or others, correct PPE to be worn, what type of substance it is and best method for clean up. •Prevent unnecessary risk to health and safety – remove workers from work area if necessary. •Prevent any further risk to the environment – stop the pollutant source. If liquid including sed basin, contain the pollutant using spill kit items or use the excavator to create an earthen bund.
IMMEDIATE COMMUNICATION	<ul style="list-style-type: none"> •Observer to inform Chief Warden <u>Zac Kay</u> and/or Site Manager <u>Levi yates</u> •Chief Warden requests emergency services if necessary i.e. if spill cannot be contained with on-site spill kits or earth, or in event of uncontrolled fire •Chief Warden request assistance from WHS Coordinator/Deputy Warden <u>Levi Yates</u> if necessary •Chief Warden informs <u>Site Manager</u> who will assist with managing the incident •Chief Warden/Site Manager to advise adjacent residences if impacted
IMMEDIATE ASSESSMENT	<p>Site Manager in consultation with Environmental Manger <u>Jacqui Blomberg</u> and/or Environmental & Regulatory Compliance <u>Victor Bendeovski</u> assess the impact</p> <ul style="list-style-type: none"> •CASE 1: cost >\$10K EPA Notification REQUIRED •CASE 2: cost <\$10K WITH discharge from site EPA Notification REQUIRED •CASE 3: cost <\$10K WITHOUT discharge from site EPA Notification NOT REQUIRED
INTERNAL COMMUNICATION	<p>If CASE 1 or 2 : Site Manager immediately informs Environmental & Regulatory Compliance</p> <p>If CASE 3: Site Manager informs Environmental Manager and/or Environmental & Regulatory Compliance</p>
EXTERNAL NOTIFICATION	<p>If CASE 1 or CASE 2 Manager with <u>Authority for External Notification</u> is to contact, in order, those listed on the <u>CONTACT LIST</u></p>
OTHER EXTERNAL NOTIFICATION	<p>If CASE 1 of CASE 2: Chief Warden or Site Manager to contact/door knock adjacent residences as necessary if impacted from incident</p>

PINE HILL
PIRMP Appendix 1: Notification of Incident and First Response
CONTACT LIST

PINE HILL QUARRY CONTACT LIST

Chief Warden
Zac Kay
0400 346 151

Site Manager/Deputy Warden
Levi Yates
0488 037 441

Site Supervisor
Nathan Booth
0457 462 107

Environmental Manager
Jacqui Blomberg
0436 609 556

Environmental & Regulatory Compliance Manager
Victor Bendeovski
0410 327 635

EXTERNAL NOTIFICATION

Emergency Services
only if the incident is an immediate threat to human
health or property
000

EPA Pollution Hotline
131 555

Oberon District Hospital
6336 7200

SafeWork NSW
131 050

Oberon Council
6329 8100

Fire & Rescue NSW
6336 0331

**Pine Hill
PIRMP Appendix 2: Site Environmental Maps**

