Pollution Incident Response Management Plan Borg Plantations Pty Ltd Bark / Timber Processing Facility 26 Endeavour Street Oberon February 2019

EXECUTIVE SUMMARY

This Pollution Incident Response Management Plan (PIRMP) has been developed for the Borg Plantation Bark/Timber Processing and Landscape Supplies Facility located at 26 Endeavour St, Oberon NSW.

This document has been set out to fulfil the requirements of Part 5.7A of the *Protection of the Environment Operations Act* 1997 and contains the details required for pollution incident response management plans as set out within Part 3A of the *Protection of the Environment Operations (General) Regulation* 2009.

The content of this plan includes:

- The procedures to be followed by the licence holder in notifying a pollution incident;
- A detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and
- The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and the persons through whom all communications are to be made.

It is important to note that this PIRMP is a working document. If operating conditions or resource recovery practices on the site change, the PIRMP needs to be updated to reflect the changes in practices. Borg Plantations is committed to working with the NSW Environment Protection Authority (EPA), and appropriate changes to the conditions of the Environment Protection Licence will be made before any site changes are implemented.

Below is a summary of the immediate steps to be taken in the event of a pollution incident (Table E.1).

Table E.1. Summary of Pollution Incident Response.

In the event o	of a pollution incident	Responsibility and Action Required	Section of Report
Step 1	Contact Director / Operations Manager		Section 7
Step 2	Is there an immediate threat to human health and the environment?	Call Emergency Services (000) or 112 for mobile phones	Section 8.1
Step 3	Does the site need to be evacuated?	Initiate evacuation procedure Safely follow pollution incident procedures	Section 8 & 10
Step 4	Inform other relevant authorities of the incident	Follow the pollution incident plan contacting the relevant authorities	Section 8.1
Additional staff	responsibilities		
Step 5	Onsite Staff	Operations Manager	Director
	Assist with Clean Up	Coordinate onsite plan	Call relevant regulatory authorities as specified in Section 8.1
	Follow instructions of Operations Manager	Barricade off area and notify staff onsite	Engage appropriate consultants
		Complete incident reporting form	Submit incident report form to EPA
			Review this plan within 30 days of report

It is recommended that all sections of this document are read, and the appropriate training undertaken, prior to responding to an incident.

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1. Purpose of This Plan

Under the *Protection of the Environment Operations Act* 1997, holders of an Environment Protection Licence (EPL) must prepare and implement a PIRMP.

The objectives of the PIRMP are to:

Ensure comprehensive and timely <u>communication</u> about a pollution incident to staff, EPA, authorities and other stakeholders



<u>Minimise and control the risk</u> of a pollution incident by identifying risks and planning actions to minimise and manage them



Ensure that the plan is properly implemented by nominated trained staff, and regularly tested

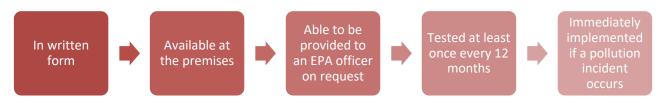
A "pollution incident" is defined as:

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 noise.

The PIRMP must be:



2. About the Site

Address

• 26 Endeavour St, Oberon

Lot number

- Lot 18/DP1249431
- Part of Lot 33/DP1228591
- Part of Lot 34/DP1228591

Development site size

• 50,885 m² in total.

LGA

• Oberon Council

Zoning

- Lot 18/DP1249431 IN1 General Industrial
- Lot 33/DP1228591 RU1 Primary Production
- Lot 34/DP1228591 IN1 General Industrial

Regulatory Controls

- Under the Oberon Local Environmental Plan 2013, waste or resource management facilities are permissible development under the IN1 -General Industrial zoning, with consent. As such, it is considered the proposed development is compatible with the LEP.
- The proposed development meets the definition of a "Resource recovery facility" under Section 120 of the *State Environmental Planning Policy (Infrastructure)* 2007. The development is considered to be consistent with Section 120 of the *State Environmental Planning Policy (Infrastructure)* 2007, being development which is permissible subject to development consent from council.
- An Environment Protection Licence is required for this facility under the *Protection of the Environment Operations Act* 1997

Waste types accepted

- •The facility will receive up to 99,000 tonnes of pinebark, wood pallets and sawdust.
- •Overall resource recovery rate for facility is expected to be close to 99%.

2.1 Location and Site Description

The site is located at 26 Endeavour St, Oberon, NSW (Lot 34 DP 1228591). The Site is located to the north of Oberon townsite, approximately 500m from the nearest residential dwelling. Oberon is located in the Central Plains region of New South Wales, 46 km south east of Bathurst, 77 km west of Katoomba and 195 km west of Sydney.

An aerial view of the site are given in Figure 2.1. The proposed site will occupy Lot 18 DP1249431 and parts of Lot 33 and 34 DP1228591.

The proposed site has a total area of approximately 5.09 hectares. This area was previously used for agricultural purposes but is currently vacant and unused. The site is unsealed, largely clear of vegetation and does not include any existing dwellings.

The proposed site is situated on land zoned IN1 General Industrial and RU1 Primary Production. There are a small number of nearby land use zones, including RU1 Primary Production to the north and adjoining to the east, R1 General Residential to the south, and B2 Local Centre further south. The nearest residential zoned land is approximately 500m to the south of the site boundary. The nearest residential receivers are separated by other industrial activities (including other un-associated outdoor waste processing and recycling activities) and a heavy vehicle bypass.

Pollution Incident Response Management Plan

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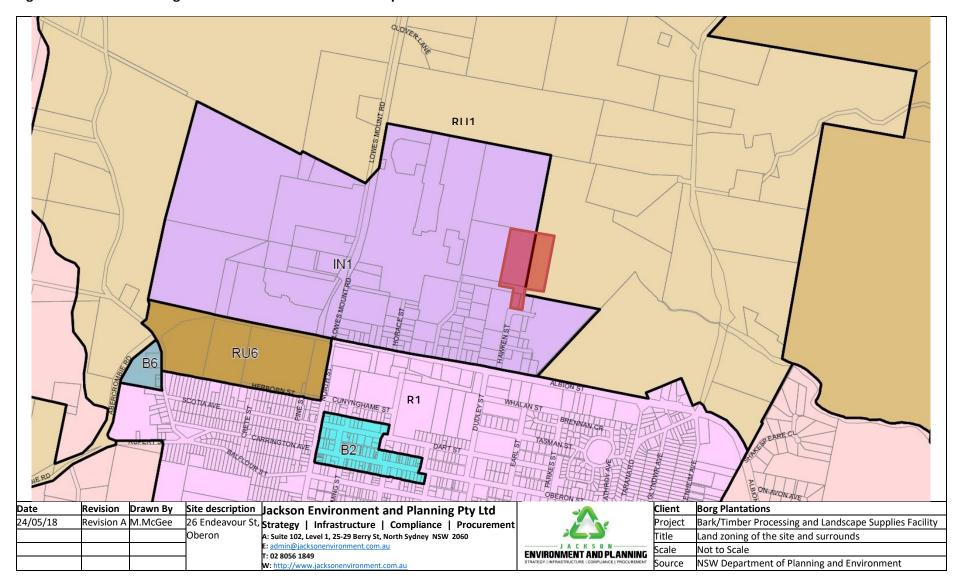
Figure 2.1. Aerial view of the subject site – development site coloured red.



Pollution Incident Response Management Plan

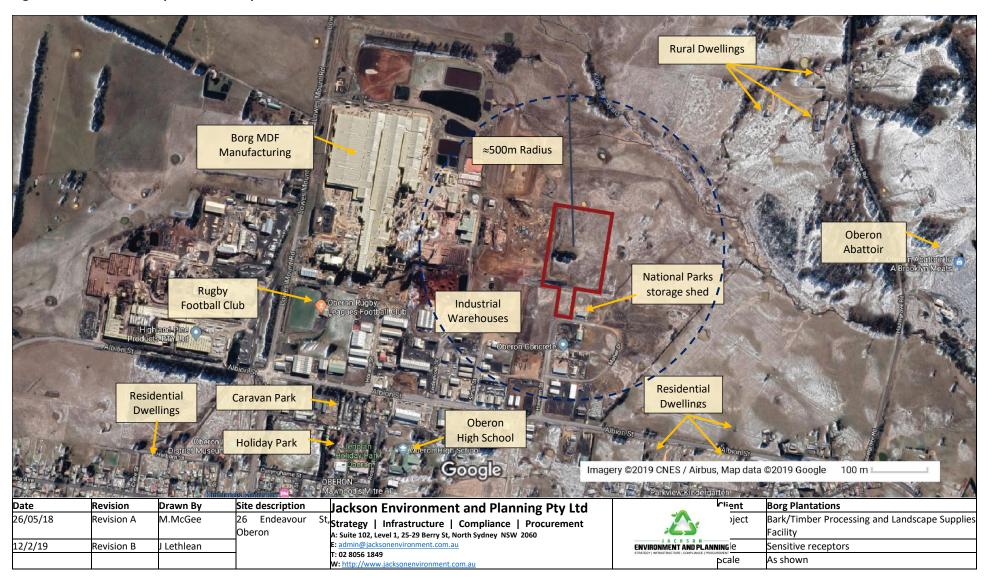
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Figure 2.2. Land use zoning of the site and surrounds – development site coloured red.



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Figure 2.3. Sensitive receptors – development site is coloured red.



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Figure 2.4. Named watercourse near the proposed development (Kings Stockyard Creek, in blue shading).



Table 2.1. Overview of waste receival and processing at maximum capacity (2023).

Waste Type	Tonnes Per Year	Process	Products	Customers
Pinebark residuals	64,350	 Shredded to meet mulch size requirements Processed to meet the appropriate NSW EPA Resource Recovery Order 	• Mulch	GovernmentLandscapers
Wooden pallets	29,700	 Shredded to reduce particle size Screened to different sizes with portable mobile screen Magnet to extract steel staples, etc. Processed to meet the requirements of the Recovered Aggregates Order 2014 	MulchScrap metal	 Government Landscapers Metal recycler Sims Group Australia Holdings Ltd, Milperra (EPL 2207)
Sawdust	4,950	 Blended with mulch to product small sized mulch product Stored Transported off site 	• Mulch	GovernmentLandscapers
TOTAL	99,000			

2.2 Topography

Topographically, the site and surrounding areas are relatively flat. The land to the North and East of the site is currently zoned RU1. This land is largely unoccupied.

The site will be levelled and formed such that the site will gently slope towards the on-site detention basin (OSD) in the north-east corner of the site.

2.3 Nearest Sensitive Receptors

2.3.1 Neighbouring properties

The subject site is located approximately 600m north of the residential zoned area (see Figure 2.3).

Land to the immediate south of the site consists of an industrial subdivision, with varied operators including automotive, self-storage, building supplies and recycling facilities. The area directly to the north and west of the site is owned and managed by Borg. Land adjoining to the east of the site is zoned RU1 Primary Production.

The nearest residential zoned land is approximately 600m to the south of the proposed site boundaries, and the closest residential premises are approximately 670m to the south east of the site.

Other key nearby sensitive receptors include:

- Oberon High School located approximately 650m south of the site;
- A caravan park located approximately 720m south west of the site; and
- Rural premises in RU1 zoned land approximately 650m north east of the site.

The only non-Borg owned premises currently directly adjoining the site is a National Parks and Wildlife storage shed and depot.

The adjoining and nearby premises/activities can be considered as sensitive receptors, and impacts on these properties will be carefully considered and mitigated as part of the environmental planning investigations in preparing the Environmental Impact Statement for the development. A key issue associated with the development is potentially noise generated by the processing equipment. It is proposed to mitigate the noise using a series of aesthetically designed noise barriers and landscaping.

2.3.2 Waterway

Stormwater from the site will be collected in an on-site detention basin (OSD) in the north-east corner of the site. The water will be re-used on site, mainly for dust suppression. The nearest watercourse is a small, named creek to the North-east of the site (Figure 2.4). The creek is approximately 290m from the main processing area.

In the event of a fire, fire-fighting water will be contained within the stormwater drainage and capture system, consisting of drainage channels, pollutant traps and an on-site storage pond. Contaminated water would be pumped out and disposed at an appropriate facility.

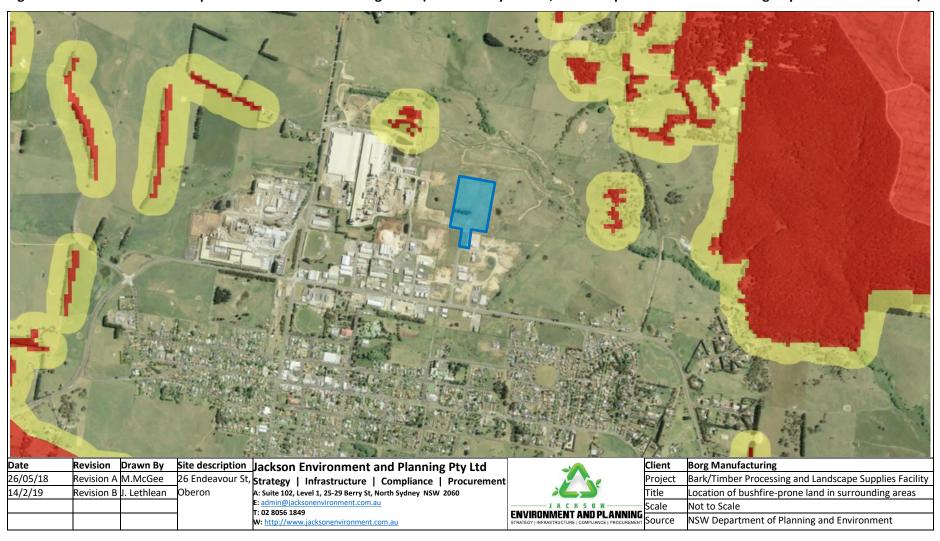
2.3.3 Vegetation and habitat

The development site is former farmland, which has been vacant for some years. There are several trees/shrubs in the centre of the site, with remainder of the site covered in grass. The highly disturbed nature of the site means that any significant vegetation on the site is highly unlikely.

2.3.4 Bushfire Prone Land

The site is not on or near any designated bushfire prone land. (Figure 2.5).

Figure 2.5. Location of bushfire-prone land in the surrounding areas (lot boundary in blue; bush fire prone land in red shading as per Oberon LEP 2013).



2.3.5 Surrounding Premises

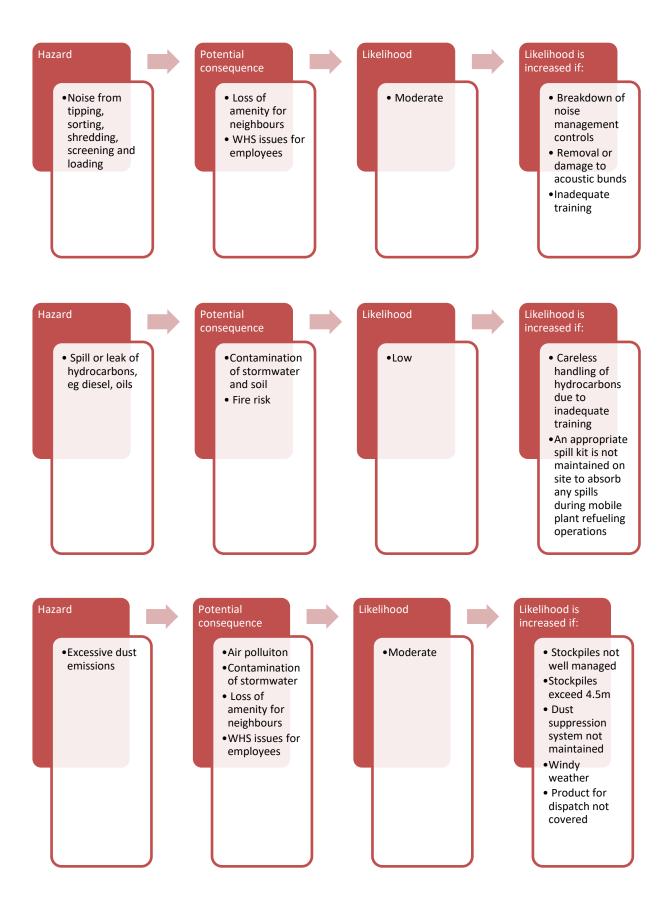
Figure 2.3 shows the Facility's immediate neighbours. The site is in an IN1 General Industrial area. The Facility is therefore considered compatible with the surrounding premises and land uses. The activities of the adjoining properties are summarised in Table 2.2. It should be noted that the list below does not include vacant properties.

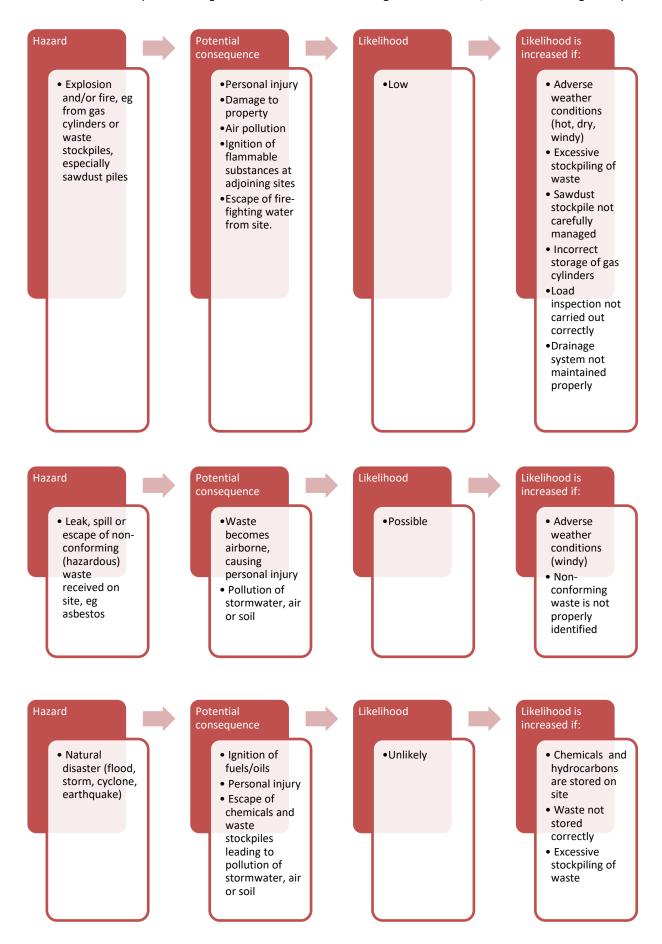
Table 2.2 . Properties within 500m of the development site.

No.	Address	Suburb	Zone	Zone Description	Occupied/Vacant
1	1 Sirius Street	Oberon	IN1	General Industrial	Occupied
2	2 Sirius Street	Oberon	IN1	General Industrial	Occupied
3	3 Sirius Street	Oberon	IN1	General Industrial	Occupied
4	4 Sirius Street	Oberon	IN1	General Industrial	Vacant
5	5 Sirius Street	Oberon	IN1	General Industrial	Occupied
6	6 Sirius Street	Oberon	IN1	General Industrial	Occupied
7	7 Sirus Street	Oberon	IN1	General Industrial	Occupied
8	8 Sirius Street	Oberon	IN1	General Industrial	Occupied
9	10 Sirius Street	Oberon	IN1	General Industrial	Occupied
10	30 Albion Street	Oberon	IN1	General Industrial	Occupied
11	36 Albion Street	Oberon	IN1	General Industrial	Occupied
12	38 Albion Street	Oberon	IN1	General Industrial	Occupied
13	46 Albion Street	Oberon	IN1	General Industrial	Vacant
14	37-39 Albion Street	Oberon	R1	General Residential	Occupied
15	41 Albion Street	Oberon	R1	General Residential	Occupied
16	45-51 Albion Street	Oberon	R1	General Residential	Occupied
17	53 Albion Street	Oberon	R1	General Residential	Occupied
18	57 Albion Street	Oberon	R1	General Residential	Occupied
19	66 Albion Street	Oberon	IN1	General Industrial	Occupied
20	72 Albion Street	Oberon	IN1	General Industrial	Occupied
21	1 Dudley Street	Oberon	R1	General Residential	Occupied
22	1 Hazelgrove Rd	Oberon	E1	National Parks and Nature Reserves	Vacant
23	123 Hazelgrove Rd	Oberon	E1	National Parks and Nature Reserves	Occupied
24	125 Hazelgrove Rd	Oberon	E1	National Parks and Nature Reserves	Occupied
25	1 Endeavour Street	Oberon	IN1	General Industrial	Occupied
26	2 Endeavour Street	Oberon	IN1	General Industrial	Occupied
27	3-5 Endeavour Street	Oberon	IN1	General Industrial	Occupied
28	4 Endeavour Street	Oberon	IN1	General Industrial	Occupied
29	6 Endeavour Street	Oberon	IN1	General Industrial	Occupied
30	7 Endeavour Street	Oberon	IN1	General Industrial	Occupied
31	8 Endeavour Street	Oberon	IN1	General Industrial	Occupied

No.	Address	Suburb	Zone	Zone Description	Occupied/Vacant
32	9 Endeavour Street	Oberon	IN1	General Industrial	Occupied
33	10 Endeavour Street	Oberon	IN1	General Industrial	Occupied
34	11 Endeavour Street	Oberon	IN1	General Industrial	Occupied
35	12 Endeavour Street	Oberon	IN1	General Industrial	Occupied
36	13 Endeavour Street	Oberon	IN1	General Industrial	Occupied
37	14 Endeavour Street	Oberon	IN1	General Industrial	Vacant
38	15 Endeavour Street	Oberon	IN1	General Industrial	Vacant
39	16 Endeavour Street	Oberon	IN1	General Industrial	Vacant
40	17 Endeavour Street	Oberon	IN1	General Industrial	Vacant
41	18 Endeavour Street	Oberon	IN1	General Industrial	Vacant
42	24 Endeavour Street	Oberon	IN1 E1	General Industrial National Parks and Nature Reserves	Vacant
43	31 Endeavour Street	Oberon	IN1	General Industrial	Occupied
44	10 Hawken Street	Oberon	IN1	General Industrial	Vacant
45	25 Hawken Street	Oberon	IN1	General Industrial	Vacant
46	45 Hawken Street	Oberon	IN1	General Industrial	Occupied
47	50 Hawken Street	Oberon	IN1	General Industrial	Occupied
48	8 Horace Street	Oberon	IN1	General Industrial	Occupied
49	11 Horace Street	Oberon	IN1	General Industrial	Occupied
50	13-15 Horace Street	Oberon	IN1	General Industrial	Occupied
51	17-19 Horace Street	Oberon	IN1	General Industrial	Occupied
52	124 Lowes Mount Road	Oberon	IN1	General Industrial	Occupied
53	26 Maher Drive	Oberon	IN1	General Industrial	Vacant
54	4 Maher Drive	Oberon	IN1	General Industrial	Vacant
55	57 Maher Drive	Oberon	IN1	General Industrial	Occupied
56	96-106 Maher Drive	Oberon	IN1	General Industrial	Occupied
57	9 Maher Drive	Oberon	IN1	General Industrial	Occupied

3. Description and Likelihood of the Main Hazards





4. **Pre-Emptive Actions to be taken**

The main hazards, and the mitigation measures in place for each one, are shown below.

Spill or leak of chemicals

- All chemicals will be appropriately stored , labelled and bunded
- •Spill kits will be ready accessible and maintained
- Material Safety Data Sheets for all chemicals will be available on site
- Drains will be protected with geotextile covers

Spill or leak of hydrocarbons

- Fully bunded diesel tank with covered and bunded concrete refuelling area to contain spills
- •An appropriate spill kit will be maintained on site to absorb any spills
- Any diesel spillages during refueling will be immediately contained and absorbed, and disposed of appropriately
- •Soils impacted by hydrocarbons will be disposed of to a suitably licenced facility

Excessive dust

- Dust will be manually suppressed via both a manual and fixed spray system
- Miscellaneous materials will be removed as they are identified and place in waste bins
- Water sprays will be in place on all equipment used to handle the waste materials
- A procedure will be in place to ensure maintenance of the equipment and that it meets requirements before coming to site

Explosion or fire

- Stockpiles will remain under the prescribed height limit
- Access roads surrounding site and stockpiles
- Fire hoses, general purpose fire extinguishers, and fire extinguishers suitable for control of oil/fuel fires, will be available on site
- Fire water to be contained in stormwater drainage and on-site storage system
- Staff will be trained in the use of fire extinguishers
- Gas cylinders will be stored and labelled correctly

Escape of non

- All incoming waste will be screened as per the Procedure for Non-conforming waste
- •Any non-conforming waste identified will be dealt with in accordance with the Procedure for Non-conforming waste
- Any asbestos identified will be handled as per the NSW EPA's Draft Protocol for Managing Asbestos During Resource Recovery of Construction and Demolition Waste
- •Stockpiles will remain under the prescribed height limit

- Appropriate insurance policies will be purchased
- •Staff will be trained in the emergency procedures

5. Inventory of Potential Pollutants

Table 5.1. Inventory of potential pollutants.

Potential pollutant	Storage location	Maximum quantity on site
Hydraulic oil	Workshop	200 Litres
Engine oil	Workshop	200 Litres
Gear oil	Workshop	200 Litres
Transmission oil	Workshop	200 Litres
Degreaser	Workshop	200 Litres
Brake fluid	Workshop	200 Litres
Grease drum cartridges	Workshop	100 Litres
Diesel	Refuelling area	65,000 Litres
LPG (gas)	Workshop	500 Kg

The storage and handling of the above pollutants are in accordance with:

- AS 1596:2014 The storage and handling of LP Gas
- AS 1940:2017 The storage and handling of flammable and combustible liquid
- AS 2030.1:2009 Gas cylinders General requirements
- Storage and Handling of Dangerous Goods Code of Practice 2005.

6. Safety and Clean-Up Equipment

Table 6.1. Type and Location of Safety and Clean-up Equipment.

Equipment	Location
Spill kits	 3 x 120L spill kites: 1 x maintenance shed near chemical store 1 x processing area 1 x fuel storage area
Safety Data Sheets (SDS)	Office
First Aid Kit	Office
Fire extinguishers	 5 x CO₂ fire extinguishers: 1 x main office 1 x maintenance shed 1 x waste storage area 1 x product storage area 1 x fuel storage area
Fire hydrant	1 x fire hydrant near site entrance.
Personal Protective Equipment	Worn by staff, spares in office
Traffic bollards and traffic cones	Office

7. Contact Details and Responsible Persons

The person responsible for implementing this plan is shown below.

In the case of a pollution incident, the following people should be notified immediately:

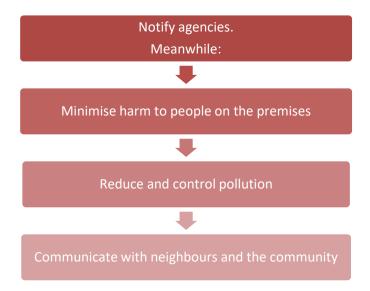
Primary site contact

 General Manager or Director

Secondary site contact

• Operations Manager

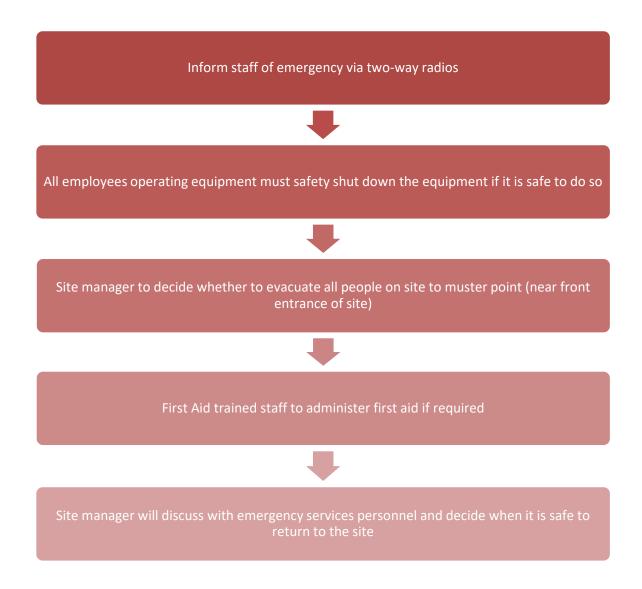
8. Actions to Be Taken During or Immediately After a Pollution Incident



8.1 Notify Agencies



8.2 Minimise Harm to People on the Premises



8.3 Reduce and Control Pollution

Spill or leak of chemicals

- Deploy spill kits
- Protect drains with sandbags / drain covers
- Follow instructions from emergency services/authorities if required
- Dispose of contaminated material through a licenced contractor and facility
- Erect appropriate barriers and signage during cleanup phase

Spill or leak of hydrocarbons

- Deploy spill kits
- Protect drains with sandbags / drain covers
- Follow instructions from emergency services/authorities if required
- Dispose of contaminated material and soil through a licenced contractor and facility
- Erect appropriate barriers and signage during cleanup phase

Excessive dust

- Cease operations
- •Ensure stockpile heights are complied with
- Wear PPE (dust masks, safety glasses)
- Apply dust suppression measures eg water cart, sprinklers
- Cover stockpiles where possible
- Protect drains with drain covers

Explosion or fire

- Deploy fire extinguishers if safe to do so
- Follow instructions from emergency services/authorities if required
- Erect appropriate barriers and signage during cleanup phase

Leak, spill or escape of hazardous waste

- Follow instructions from emergency services/authorities if required
- Protect drains with sandbags / drain covers
- Wear appropriate PPE and recover waste if safe to do so
- Engage a qualified contractor to recover and dispose of waste if required
- Erect appropriate barriers and signage during cleanup phase
- Follow instructions from emergency services/authorities
- Erect appropriate barriers and signage during cleanup phase
- Contact insurance company

Natural disaster

8.4 Communicate with Neighbours and the Community

Is there potential for off-site impacts to the community or environment? If yes, then contact the following business via telephone or where appropriate via door knocking.

Table 8.1. Contact Details for Adjacent Premises.

Premises	Address	Contact
National Parks storage shed	Maher Drive	(02) 6336 1972
Borg Manufacturing Pty Ltd – MDF plant	124 Lowes Mount Rd, Oberon	Jacqueline Blomberg Environmental Manager 0436 609 556
Oberon Concrete	LOT 6 Hawken St, Oberon	(02) 6336 0944
Biscione Automotive	9 Maher Dr, Oberon	0439 674 660
Australian Native Landscapes	7 Endeavour St, Oberon	(02) 6336 0288
Industrial premises	31 Endeavour Street, Oberon	Door knock
Industrial premises	14 Endeavour Street, Oberon	Door knock
Industrial premises	12 Endeavour Street, Oberon	Door knock
Industrial premises	57 Maher Drive, Oberon	Door knock

9. Staff Training and Testing This Plan

9.1 Staff Training

All new employees will be made aware of the requirements of the plan as part of their induction process.



All employees will be trained in the use of spill kits and fire extinguishers.



All employees are required to complete refresher training on a regular basis.



In addition to the above induction and training, details of this plan will be provided to key contacts on site and off site on request.

9.2 Testing this Plan

This plan will be reviewed once a year to ensure that the information contained within the plan is accurate and current. If necessary, the plan will be updated as a new version.



Evaculation drills will be carried out at least once a year.



Improvements identified in the review and drills will implemented.



Records will be kept of the reviews and drills, their outcomes and any improvements identified and implemented.

10. Location of Pollutant Storage, Evacuation Point and Drains

In the event of an emergency, staff will must at the evacuation point, outside the front entrance.

Figure 10.1. Location of stormwater storage and evacuation point.

