

Wood Preservation Treatment Line **(WPTL)**

2101-2113 Castlereagh Road, Penrith, NSW, 2750

Pollution Incident Response **Management Plan**

Revision History:

Rev 0: 18/4/2018 – Initial Issue
Rev 1: 16/4/2019 – Yearly Refresher
Rev 2: 12/5/2020 – Yearly Refresher
Rev 3: 12/5/2021 – Yearly Refresher
Rev 4: 12/05/2022 – Yearly Refresher

1.0 INTRODUCTION

1.1 BACKGROUND

An environment protection licence (EPL) (licence number 21087) was established by Meyer Timber NSW in 2018 for the Wood Preservation Treatment Line (WPTL) at Penrith. The licence is regulated by the NSW Environment Protection Authority (EPA) and is required under the *Protection of the Environment Operations Act 1997* due to the processing capacity of the WPTL.

Under part 5.7A of the POEO Act, licensees are required to prepare Pollution Incident Response Management Plans. These plans are designed to ensure that pollution incidents are minimised through the identification of risks and the development of planned actions to minimise and manage those risks, and to ensure that emergency response procedures are developed and implemented in the event that an incident occurs.

1.2 OBJECTIVES

The objectives of the pollution incident response management plan is to:

- provide guidance on responding to a pollution incident, such that potential harm to the environment and humans is minimised; and
- ensure timely and correct reporting of a pollution incident.

2.0 SITE INFORMATION

2.1 SITE ADDRESS AND DESCRIPTION

The Meyer Timber NSW warehouse facility is located at 2101-2113 Castlereagh Road, Penrith, NSW, 2750. The site is currently an operational timber distribution facility with the Wood Preservation Treatment Line (WPTL) allowing envelope spray treatment against termites for commonly available structural timber.

2.2 SURROUNDING LANDUSES

The land uses surrounding the Meyer Timber NSW facility are commercial in nature.

2.3 SURROUNDING SENSITIVE ENVIRONMENTS

The Nepean River is located approximately 1km to the west of the Meyer Timber NSW facility. There is also an easement adjacent to the Meyer Timber NSW site which drains into the Nepean River (refer to Photo 1 below).



Photo 1- Meyer Timber NSW location

2.4 ENVIRONMENTAL HAZARDS AND POLLUTANT INVENTORY

The primary environmental hazard at the WPTL is the potential for containment failures and consequent loss of preservation chemical to the surrounding environment.

The WPTL uses 1,000L IBC's for wood preservation, containing "Determite ULO Timber Framing Insecticide RTU". It should be noted that this chemical is not classified as hazardous according to Safe Work Australia criteria. There are a maximum of 5 IBC's on site at any one time, with 1 IBC being used in conjunction with the WPTL and another 4 IBC's stored as stock. Each of these is stored on an IBC containment pallet. See the following figures for more information:

- Figure A shows a site layout,
- Figure B details the location of the treatment line,
- Figure C shows the stormwater drainage plan around the WPTL.

2.5 LIKELIHOOD OF HAZARD

The hazards and risk associated with the activity is low and would extend to a chemical spill, potentially caused by:

- Delivery incident during unloading
- Damage to chemical storage IBC
- Bund Failure

3.0 RESPONDING TO POLLUTION INCIDENTS

3.1 SCOPE

In the event of a pollution incident:

Step 1: Emergency Response: Ensure personnel are safe.

Step 2: Emergency Response: Contain the incident using a combination of IBC containment pallets and WPTL spill response kits. If a spill does occur,

priority should be made to protecting the stormwater drains to ensure the spill does not migrate into the drains.

Step 3: Notify the Coordinator responsible for the works

Step 4: Coordinator to ensure relevant procedure is completed as required. Any spill that enters stormwater drains is to be treated as a reportable pollution incident.

Safety Datasheets (SDS) for relevant chemicals are retained at the WPTL and available from www.kopperspc.com.au.

3.2 POLLUTION CONTROL MEASURES

Preventive and mitigation controls established at Meyer Timber NSW WPTL include:

- All IBC's to be stored on IBC containment pallets.
- Spill kits to be located around the WPTL in proximity to both treatment line and chemical unloading areas. Spill kits to remain full of sawdust to soak up any liquid in the event of a spill



Photo 2- Onsite spill kits

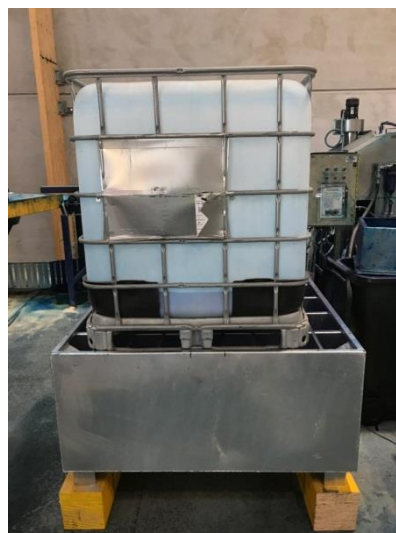


Photo 3- IBC containment pallets

3.3 CONTACT DETAILS

All environmental incidents must be reported as soon as practicable to the Meyer Timber NSW Warehouse Manager who is responsible for implementing this plan.

Role	Meyer Timber OHS Manager	Alternate Contact
Name	Tony Szczygiel	George Dolezal
Phone	02 4726 5962	02 4726 5900
Mobile	0411 131 921	0418 835 666
Email	tonys@meyertimber.com.au	georged@meyertimber.com.au

The responsible person will then report all pollution incidents IMMEDIATELY.

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.

If the pollution incident presents an immediate threat to human life or property, '000' must be called first. If the incident does not present an immediate threat to human life or property or once '000' has been called then the other relevant Authorities listed below must be notified IMMEDIATELY in the following order:

	Authority	Phone Number
1	EPA – Environment Line	131 555
2	Local Council – Penrith City Council	02 4732 7777
3	Safe Work NSW	13 10 50
4	Ministry of Health	02 9391 9000
5	Emergency Services Fire and Rescue NSW	000

Table 1- Contact details for external agencies

3.5 COMMUNITY COMMUNICATION

A pollution event from the Meyer Timber NSW WPTL may affect the neighbouring community through pollution of stormwater systems/creeks. In the event of a pollution incident occupiers of neighbouring premises will be notified and updated as required.

3.6 TESTING OF POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

In accordance with the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, this Pollution Incident Response Management Plan must be tested annually.

The NSW Warehouse Manager is responsible for the testing of this Plan. Testing may involve a "mock" spill event at the Meyer Timber NSW WPTL or a desktop "mock" exercise. A record will be maintained of test events in accordance with **Appendix A**.

In the unlikely event of a pollution incident, this plan must be tested within one month of the incident occurring.

3.7 STAFF TRAINING

A tool box talk will be completed with relevant staff located at Meyer Timber NSW WPTL annually as part of the testing of the management plan. The toolbox talk will include instruction on the use of the spill kits. A record of toolbox talks will be maintained in accordance with **Appendix A**.

FIGURES

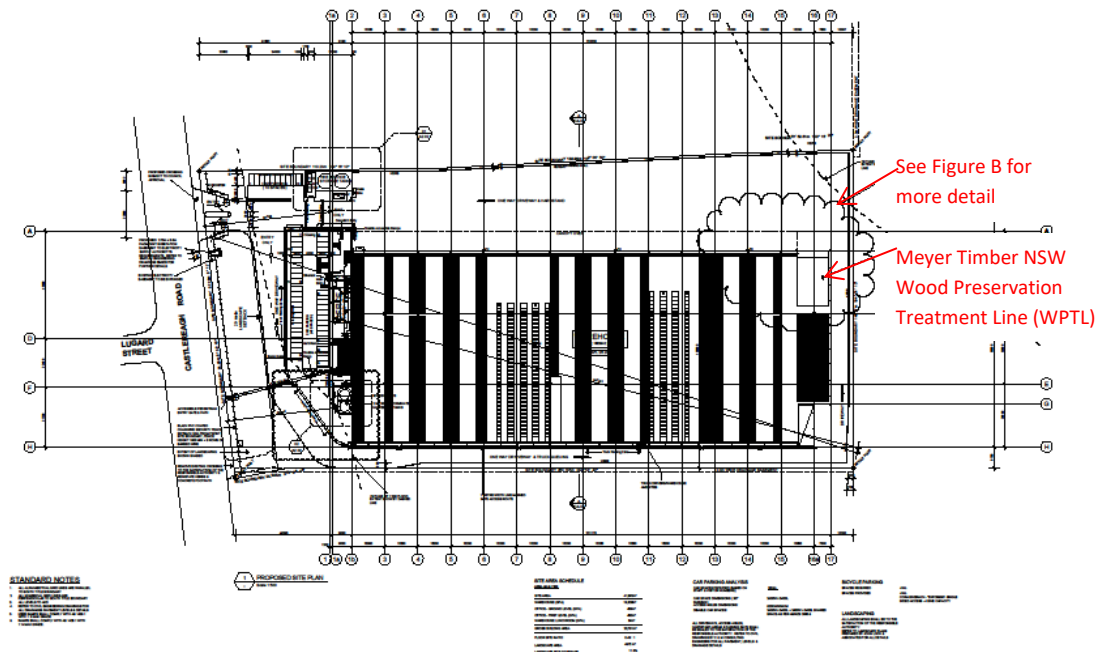


Figure A – Site Location

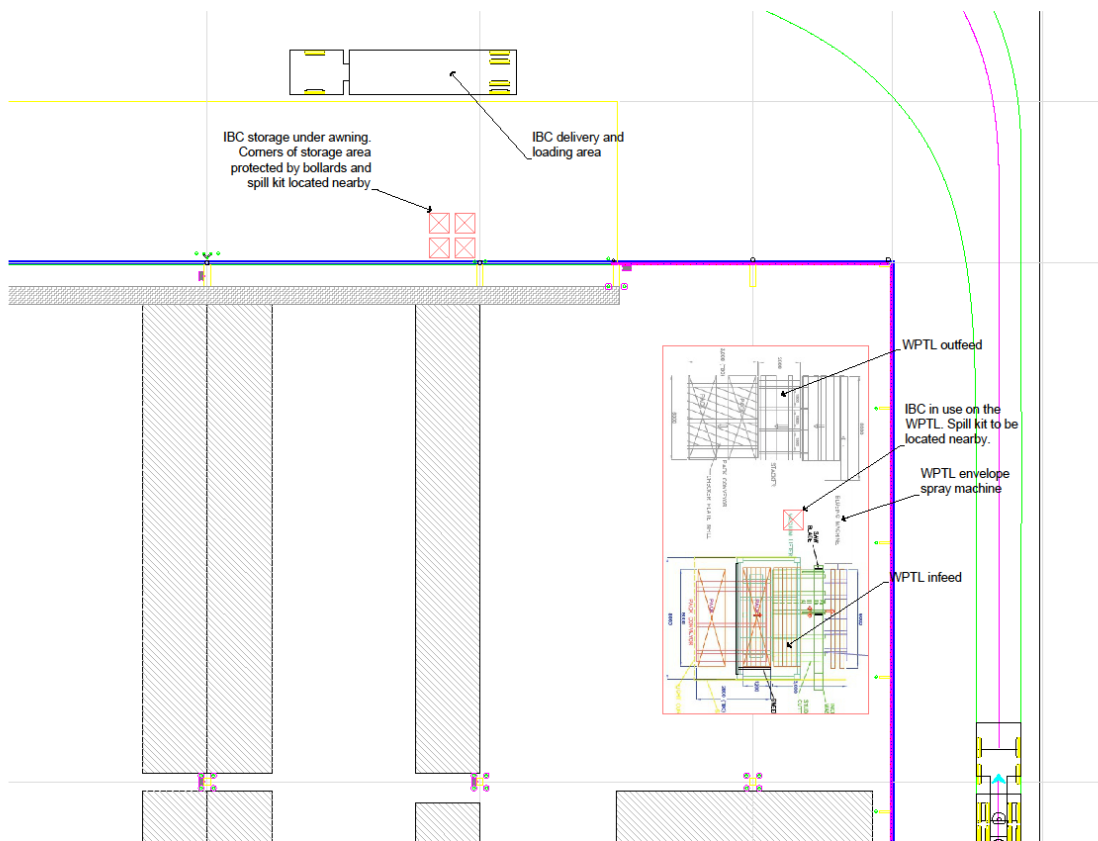


Figure B – Meyer Timber NSW WPTL Layout

APPENDIX A

Training, Testing and Incident Register

Date	Event Type	Comments (Personnel, outcomes, etc)
20/4/18	Initial Training	Co-ordinators, Forklift Drivers, WPTL Staff
16/4/18	Yearly revision	Co-ordinators, Forklift Drivers, WPTL Staff
4/1/19	Yearly revision	Co-ordinators, Forklift Drivers, WPTL Staff
12/05/20	Yearly revision	Co-ordinators, Forklift Drivers, WPTL Staff
12/05/21	Yearly revision	Co-ordinators, Forklift Drivers, WPTL Staff
12/05/22	Yearly revision	Co-ordinators, Forklift Drivers, WPTL Staff