



# Howard & Sons Pyrotechnics

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## Wallerawang Pollution Incident Response Management Plan

Issued Rachel Nicoll  
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Author

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## 1.0 INTRODUCTION

Howard & Sons Pyrotechnics have developed the Pollution Incident Response Management Plan (PIRMP) to satisfy pollution reporting obligations under the *Protection of the Environment Operations Act 1997* (POEO Act). This PIRMP outlines the process of testing, reporting, communicating and management requirements of an environmental pollution incident.

The objectives of this plan are to:

1. ensure comprehensive and timely communication about the pollution incident is provided to;
  - Howard & Sons and sub-contractor personnel
  - Environmental Protection Authority
  - WorkCover NSW
  - Fire and Rescue NSW
  - Lithgow City Council
  - Residents and wider community outside the facility who may be affected by the impacts of the pollution incident.
2. minimise and control the risk of a pollution incident by identifying risks and developing planned actions to minimise and manage those risks;
3. ensure the PIRMP is implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the PIRMP is regularly tested for accuracy, currency and suitability.

The operations of Howard & Sons Pyrotechnics must comply with:

- Work Health and Safety Act 2011 (WHS Act)
- Work Health and Safety Regulations 2011 (WHS Regs)
- Protection of the Environment Operations Act 1997 (POEO Act)
- Environment Protection Licence No. 11640 Howard & Sons Pyrotechnics

## 1.1 LEGISLATIVE REQUIREMENTS

The specific requirements for Pollution Incident Response Management Plans (PIRMP) are set out in Part 5.7A of the Protection of the Environment Operations Act 1997 (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 or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (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).

## 2.0 DEFINITION OF A POLLUTION INCIDENT

The POEO Act 1997 defines a pollution incident as:

*"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 licensee is required to notify the relevant regulatory authorities of a pollution incident 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.*

## 3.0 IMMEDIATE NOTIFICATION OF POLLUTION INCIDENT

Licensees are required to report pollution incidents immediately so that a coordinated response to prevent or limit harm to the environment can be achieved.

Call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue, NSW Police and NSW Ambulance Service will be the first responders.

If the incident does not present an immediate threat, or following the 000 call being made, notify any pollution incident at Howard & Sons Pyrotechnics Wallerawang to the relevant Regulatory Authorities in the following order:

Regulatory Authority	Contact Telephone	Email
Environment Protection Authority (EPA)	131555 or 9995 5555	info@ environment.nsw.gov.au
WorkCover	13 10 50	
Ministry of Health Bathurst Office	02 6339 5601 AH: 0418 866 397 ask for Public Health Officer on call.	
Lithgow City Council	02 6354 9999 or 1300 661 303 AH: 02 6354 9999	council@lithgow.nsw.gov.au
Fire and Rescue NSW	1300 729 579	

Note: \*\*\*\* for privacy reasons neighbouring contact details are not displayed in this document. These numbers are available from the Howard & Sons Pyrotechnics Administration Office.

Notifications made under this plan are to be clear and concise. Initial notifications may be followed with subsequent notifications and may include additional or more detailed information. As a minimum, notifications should include:

- A brief statement on the nature and timing of the pollution incident;
- Which authority is responsible for attending?;
- The action (if any) required by the recipient of the notification.

### 3.1 Community Consultation

In addition to the above mechanisms when notifying of a pollution incident, Howard & Sons Pyrotechnics will contact by phone the owners and occupiers of the premises who may be affected by an incident occurring on the premises. The contact numbers of immediate owners and occupiers are listed in appendix 3 (Appendix 3 will be hidden in Website Version).

Notifications will include:

- Notification of the nature and time of the pollution incident;
- Regulatory Authorities notified or attending;
- Advising of any action required;
- Contact person to discuss developments or concerns with.

Neighbours and the local community will have the opportunity to discuss the plan and any improvements at Community Consultative Committee meetings held at the Howard & Sons Premises.

### 4.0 ACTIONS FOLLOWING A POLLUTION INCIDENT

On determining that an incident is a notifiable pollution incident, there will be a detailed incident investigation using the *Record of Pollution Incident Notification* form which must satisfy:

1. Incident location and estimate quantity and type of pollutant(s) involved;
2. Incident description (date, time, duration) and cause if known (do not speculate);
3. Immediate actions to be taken to address the pollution incident (do not speculate).

The completed report must be submitted to the directors within 24 hours.

Each relevant regulatory authority must then be notified (in writing) within 7 (seven) days of the pollution incident. The *Record of Pollution Incident Notification* form will be submitted. If notified of a pollution incident by the public then the complaint will be logged as per the Pollution Complaint Form Appendix 2.

Within a month following a pollution incident, the PIRMP will be reviewed and tested.

All staff and contractors will receive the necessary refresher training, and the key outcomes of the incident investigation will be reported to staff and contractors.

### 5.0 CONTACT DETAILS.

#### Details for those Managing the Response

The following Centennial personnel outlined in **Table 1** are responsible for reporting the environmental incidents.

Key Contact	Contact Details
Christian Howard	0418 218 432 christian@howardsfireworks.com.au
Rachel Nicoll	0448 920 548 rachel@howardsfireworks.com.au

## **6.0 INVENTORY OF POLLUTANTS**

Howard & Sons Pyrotechnics stores, handles and uses a number of chemicals in its production processes and has a comprehensive system for safe handling of such chemicals. To assist the correct storage, handling and use the company employs the following systems:

- Hazardous Chemicals Register and Manifest and Notification Procedure;
- Safety Data Sheets (SDS);
- Procedures for the approval of new chemicals on site;
- Procedures for safe storage and use of these chemicals;

In addition, to meet the requirements of Acts other than the environmental legislation, Howard & Sons Pyrotechnics updates the Hazardous Chemicals register and Manifest which is provided annually to NSW WorkCover Authority under the WHS legislation.

## **7.0 MINIMISING HARM TO PERSONS ON THE PREMISES**

All staff and contractors are to be inducted before completing any work on site. In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site Evacuation Procedure. All staff and contractors are trained on the location of evacuation points through site inductions, signage and on-going training.

## **8.0 MAPS**

The following maps are provided in Appendix 4 as a required in clause 98C (1) (k) of the Regulation.

1. Location of the area and surrounding premises;
2. Stormwater management plan.

## **9.0 DESCRIPTION AND LIKELIHOOD OF POTENTIAL HAZARDS AND PRE-EMPTIVE ACTIONS**

This section has been prepared to meet the requirements of clause 98C (1) (a), (b), (c) and (j) of the POEO (G) Regulation.

### **9.1 Actions to Minimise a Pollution Incident**

The Howard & Sons Wallerawang Emergency Risk Assessment identifies potential hazards to the environment and community. A number of controls have been identified and put in place to reduce the likelihood of a pollution incident occurring, these include:

- Site Safety Management Plans;
- Regular inspections and maintenance;
- Improvement to storage and waste management; and
- Training and awareness.

A summary of the potential hazards to the environment and community and the controls in place are outlined in Table 2 below:

Table 2: Pre-Emptive Actions to Potential Hazards

Potential Hazards	Likelihood	Controls
Breach of Environmental Licence Conditions	Possible	<ul style="list-style-type: none"> <li>• Audits and Inspections</li> <li>• Environmental Management System</li> </ul>
Incorrect Use, Storage & Handling Hazardous Materials	Remote	<ul style="list-style-type: none"> <li>• Hazardous substances provided with labels and Safety Data Sheets (SDS).</li> <li>• Employee Information and Training</li> <li>• Risk Assessment for the control of exposure to hazardous materials.</li> <li>• Storage and Handling contained in the relevant safety management plan or safe operating procedure for the safe use of a hazardous substance.</li> </ul>
Spill Hazardous Materials	Possible	<ul style="list-style-type: none"> <li>• Trained and competent personnel</li> <li>• Safe Operating Procedures</li> <li>• Environmental Management System</li> <li>• Inspection program in place</li> <li>• Fit for purpose equipment and spill kits on site</li> <li>• Hazardous Substances storage, handling, and risk assessment procedures</li> </ul>
Noise impacts on neighbours	Possible	<ul style="list-style-type: none"> <li>• Environmental Management System</li> <li>• Noise monitoring</li> <li>• Management representatives</li> </ul>
Airborne dust	Remote	<ul style="list-style-type: none"> <li>• Training of Staff and procedures to limit airborne dusts.</li> </ul>

## 10.0 INVENTORY OF POTENTIAL POLLUTANTS

Potential pollutants (chemicals) stored onsite at Howard & Sons Pyrotechnics Wallerawang are listed in the Acknowledgement of Dangerous Goods on Premises, Acknowledgement number 35/035157. The expiry date of this Acknowledgement is 07/12/2014.

The renewed Acknowledgement of Dangerous Goods on Premises will be attached as an appendix to this plan.

## 11.0 SAFETY EQUIPMENT

The table below outlines the safety equipment kept on site.

Table 3: Inventory of Safety Equipment:

Product Name:	Location of where equipment is stored:
Fire Extinguishers	Available in plant, vehicles and stores.
Fire Hydrant	Fire Hydrants located around the site.
First Aid Room & Supplies	Administration Offices, vehicles, workshops.
PPE	Administration Offices, Change Rooms and Workshops.
Spill Kit	Workshop

## **12.0 MINIMISING HARM TO PERSONS ON THE PREMISES**

### **12.1 Staff Training**

#### **Site Induction**

Management is responsible for ensuring that prior to work being undertaken; all personnel entering the site receive an Induction using the Employee or Contractors induction available in the Workplace Policy and Guidelines & Induction Manual.

This shall be in accordance with Howard & Sons Pyrotechnics Wallerawang Facility Site Security Plan.

Employee Induction: The purpose of the employee induction is to ensure that all personnel entering are aware of the hazards and control measures within the facility. Persons undertake the Induction on commencement of employment and refreshed following a change of conditions to such an extent that a new Induction of all persons is required.

Contractors Induction: The purpose of the employee induction is to instruct contractors on the operational procedures for safe working at the Howard and Sons Pyrotechnics Wallerawang Facility. Contractors undertake the Induction prior to commencing any works on site and following provision of the permit to work, insurance information, OH&S policies and SWMS.

The requirements of the PIRMP will be outlined in the site induction for all new employees and contractors.

The Business Administration Manager shall ensure a register is maintained of all persons Inducted into the facility.

#### **Training of Staff**

Safety profiles have been developed in employee position descriptions. Additional training required for specific positions has also been identified.

Employees should only undertake tasks for which they have received appropriate training or accreditation or have been deemed competent by their immediate supervisor.

Employees required to operate plant and equipment shall be appropriately qualified, competent, licensed or trained to operate the item of plant or equipment safely and competently. A record of appropriate qualifications, competencies and licences is available from Howard & Sons offices.

### **12.2 Site Evacuation**

As part of the site induction, an evacuation and emergency assembly point is established at the site entrance in accordance with Howard and Sons Wallerawang Emergency Plan. In case of an evacuation the Supervisor shall notify all persons on site to evacuate the site. Persons shall not leave the assembly point until instructed to do so by the Supervisor.

## **13.0 TESTING THE PLAN**

The Howard & Sons PIRMP will be tested routinely every twelve months as per the requirement of the POEO (G) Regulation. at least once every 12 months. This testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that the plan is



This plan shall be routinely tested by:

1. Conducting an emergency drill at the site based on a possible incident scenario. This will be in accordance with Howard & Sons Pyrotechnics Wallerawang Emergency Plan.
2. Simulating the communications process required as part of the incident response by individuals authorised to activate the PIRMP and managing the response to the pollution incident.

An evaluation of these tests shall be undertaken, and records retained by the Business Administration manager.

## **14.0 DOCUMENT DISTRIBUTION**

The controlled copy will be retained on the Howard & Sons Pyrotechnics server, accessible by personnel as necessary.

A controlled hardcopy of the PIRMP will be kept on the premises to which the licence relates. All other paper copies of this PIRMP will be considered as 'uncontrolled'.

The Protection of the Environment Operations (General) Regulation 2009 (clause 98D) establishes that pollution incident response management plans are to be available on public websites, specifically the procedures required under section 153C (a) of the Act for notifying a pollution incident, and the details required under clause 98C (1) (h)-(i) of the Regulation for contacting authorities and for providing warnings and updates. A copy of the PIRMP will be made available on our website in accordance with this requirement.

## **15.0 REFERENCES**

*NSW Environmental Protection Authority 2012, Environmental Guidelines: Preparation of Pollution Incident Response Management Plans*

*NSW Office of Environment and Heritage, Environmental Protection Licence (EPL) 11640*

*Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.*

**APPENDIX 1 - Record of Pollution Incident  
Notification Form**



<b>Date of Incident:</b>		<b>Time of Incident:</b>	
<b>Pollutant:</b>	<b>Name/nature:</b>  <b>Quantity/volume:</b>  <b>Concentration if applicable:</b>	<b>Duration of Incident:</b>	
<b>Location of Incident:</b>			
<b>Circumstances of the incident:</b>			
<b>Immediate cause of the incident:</b>			
<b>Immediate response actions taken:</b>		<b>Person Responsible for actions taken</b>	
<b>Response actions proposed:</b>			
<b>Comments:</b>			

**Appendix 1.1 - Incident Notification Record:**

<b>Authority (i.e. EPA / WorkCover)</b>	<b>Date of Notification (dd/mm/yyyy)</b>	<b>Name and contact details of the Officer</b>	<b>Reference number</b>	<b>Notification information provided</b>	<b>Comments</b>	<b>Follow up details:</b>



**APPENDIX 2 - Pollution Complaint Form**

**1. Complaint Details**

**Time and Date of Complaint:**

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Time of Complaint: \_\_\_\_:\_\_\_\_ am/pm

**Method of Complaint:**

- |                                    |   |
|------------------------------------|---|
| <input type="checkbox"/> Telephone | <input type="checkbox"/> Written Letter |
| <input type="checkbox"/> Email     | <input type="checkbox"/> Direct Contact |
| <input type="checkbox"/> Facsimile | <input type="checkbox"/> Other _____    |

**Pollution Complaint Reported:**

- |                                |                                      |
|--------------------------------|--------------------------------------|
| <input type="checkbox"/> Noise | <input type="checkbox"/> Fire        |
| <input type="checkbox"/> Dust  | <input type="checkbox"/> Explosion   |
| <input type="checkbox"/> Smoke | <input type="checkbox"/> Other _____ |

**Contact Details:**

Does the individual agree to their contact details being shared with Regulatory Authorities?

- |                              |                             |
|------------------------------|-----------------------------|
| <input type="checkbox"/> YES | <input type="checkbox"/> NO |
|------------------------------|-----------------------------|

Did the individual refuse to provide contact details?

- |                              |                             |
|------------------------------|-----------------------------|
| <input type="checkbox"/> YES | <input type="checkbox"/> NO |
|------------------------------|-----------------------------|

.....

Mr/Mrs/Ms/Miss/Dr

Surname: \_\_\_\_\_ First Name: \_\_\_\_\_

Unit Number: \_\_\_\_\_

Street Address: \_\_\_\_\_

Suburb: \_\_\_\_\_ Postcode: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax: \_\_\_\_\_

Email Address: \_\_\_\_\_

Other Contact Details / preferred method of contact: \_\_\_\_\_

Details of Complaint:

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Person Preparing this Report: \_\_\_\_\_

Signature: \_\_\_\_\_

**2. Details of Follow up:**

Person responsible to follow up: \_\_\_\_\_

Follow up/ Response Plan:

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Follow up date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Time: \_\_\_\_:\_\_\_\_ am/pm

Contact Method:

Telephone

Written Letter

Email

Direct Contact

Facsimile

Other \_\_\_\_\_

**3. Notification Details:**

Notification Required?  YES  NO

Date of Notification: \_\_\_\_/\_\_\_\_/\_\_\_\_ Time: \_\_\_\_:\_\_\_\_ am/pm

Notification made by: \_\_\_\_\_

Notification Reference Number: \_\_\_\_\_

**APPENDIX 3 – Neighbouring Contact Details**








WALLERAWANG  
WASTE DEPOT



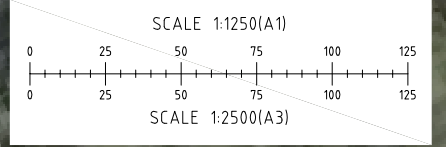
ROAD

PORTLAND

**LEGEND**

□ <sup>IP</sup>	COMMUNICATIONS PIT
■	STORMWATER PIT
○	SECURITY MONITORING
□ <sup>EP</sup>	ELECTRICITY PIT
□ <sup>WP</sup>	WATER PIT
⊕	VALVE
⊞	HYDRANT
⊞ <sup>H</sup>	HYDRANT WITH FIRE HOSE
E	EMERGENCY HOOTER

0.5m CONTOUR INTERVAL  
DATUM: AHD



**GEOLYSE**  
ORANGE  
154 PEISLEY STREET  
P.O. BOX 1963  
ORANGE, NSW 2800  
orange@geolyse.com  
www.geolyse.com  
Ph. (02) 6393 5000  
Fx. (02) 6393 5050

No	DATE	DRAFTING CHECK	PM CHECK	DETAILS
A	14/10/09	LRP	MDH	ISSUED TO CLIENT

PROJECT  
**STORMWATER MANAGEMENT PLAN**  
FILE REFERENCE: 0:\Projects\209148\Out\CAD\209148\_01A\_EV01-EV03.dwg

APPROVAL AUTHORITY  
**LITHGOW CITY COUNCIL**

CLIENT  
**HOWARD & SONS  
PYROTECHNICS**

DRAWING  
**SITE CATCHMENT  
FEATURES**  
PROJECT NUMBER: 209148 DRAWING NUMBER: 01A\_EV02 REV: A  
SOURCE: GOOGLE, CRAVEN ELLISTON & HAYES