



Howard & Sons Pyrotechnics

Wallerawang Pollution Incident Response Management Plan

This document is to be viewed in conjunction with the Emergency Management Plan.

Issued Christian Howard
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1.0 INTRODUCTION

Howard & Sons Pyrotechnics have developed the Pollution Incident Response Management Plan (PIRMP) in accordance with the requirements of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulations 2012. 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 timely and comprehensive communication about a pollution incident on site to all staff at the premises, the Environmental Protection Authority (EPA), other authorities and the
2. Minimise and control the risk of a pollution incident at the facility by identifying any environmental risks that are present and develop action plans to minimise and manage those identified risks.
3. Ensure the plan is implemented by trained employees, identify and train employees responsible for its implementation, and ensure the plan is regularly tested and modified where required to its effectiveness.

This Plan considers both air and water based pollution incident impacts. Overall well designed and documented environmental management systems are in place to effectively minimise the likelihood and impact of any of these potential pollution incidents.

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:*

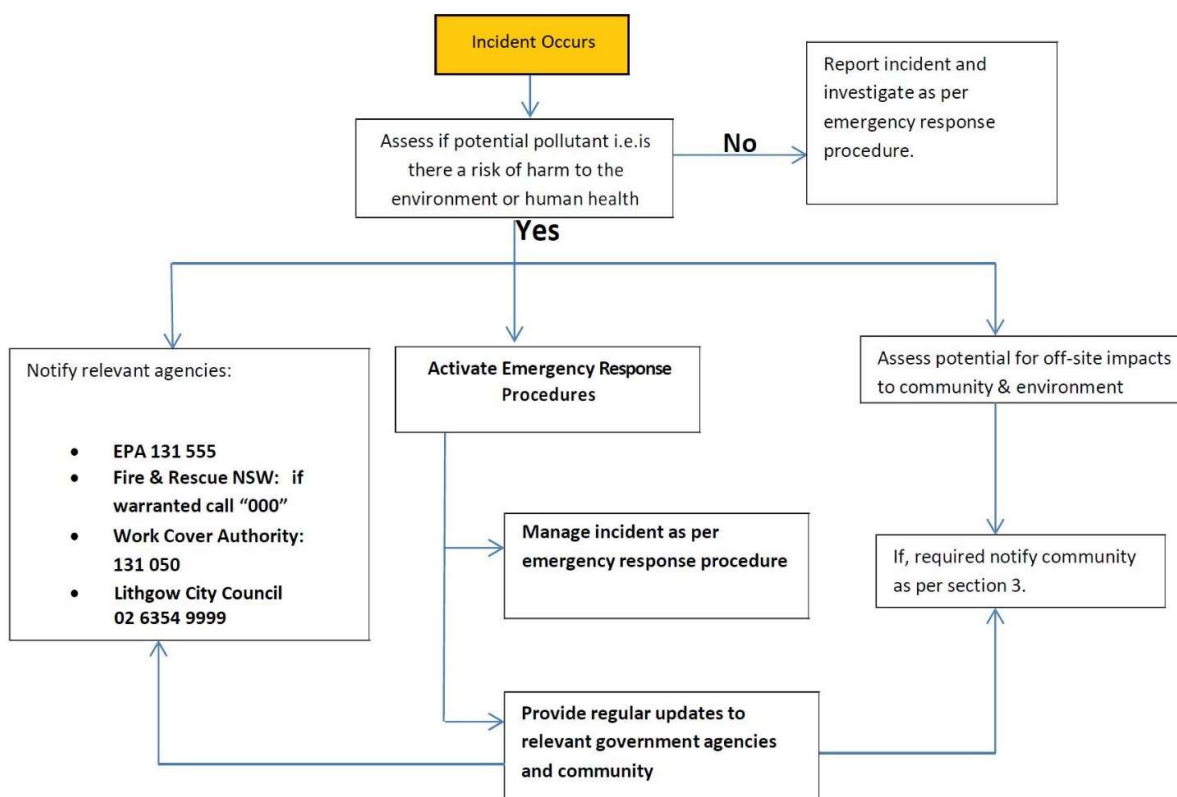
(i) *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*

(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. This section provides details on the incident response, including the communication and on-site emergency response actions for responding to an incident that has resulted in a material impact to human health or the environment.



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)	131 555 or 9995 5555	info@environment.nsw.gov.au
SafeWork NSW	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	council@lithgow.nsw.gov.au
NSW Fire and Rescue	000	

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

Community stakeholders that are potentially affected by an incident will be notified immediately by phone call after being instructed by one of the key site contacts. As detailed in the emergency response procedure any incident is communicated to immediate neighbours.

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 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
Andrew Howard	0419 270 535 andrew@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 SafeWork NSW 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 3 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 are outlined in Table 2 below:

Table 2: Pre-Emptive Actions to Potential Hazards

Potential Hazards	Hazards	Major Incidents
Class 1 Explosive	Heat, shock or friction Ignition sources	Fire, Explosion, may produce irritating, toxic, and/or corrosive gases.
Class 2.1 Flammable Gas	Loss of Containment Ignition sources	Fire, Explosion, Adverse Exposure to Substance, Chemical Spill
Class 3 Flammable Liquid	Loss of Containment Ignition sources	Fire, Explosion, Adverse Exposure to Substance, Chemical Spill
Class 4.1 Flammable Solid	Loss of Containment Ignition sources	Fire, Explosion, Adverse Exposure to Substance, Chemical Spill
Class 4.2 Spontaneously Combustible	Loss of Containment Ignition sources	Fire, Explosion, Adverse Exposure to Substance (May release toxic gas when in fire)
Class 4.3 Dangerous When Wet	Loss of Containment Ignition sources Contact with water	Fire, Explosion, Adverse Exposure to Substance (May release toxic gas when in contact with moisture, water or acids), Chemical Spill
Class 5.1 Oxidizing Agent	Loss of Containment Ignition sources Increases risk and intensity of fire by contributing oxygen	Fire, Explosion, Adverse Exposure to Substance, Chemical Spill
Class 6.1 Toxic	Loss of Containment Ignition sources	Fire, Explosion, Adverse Exposure to Substance (Will release toxic smoke when in fire), Chemical Spill

11.0 CONTROLS AND SAFETY EQUIPMENT

The table below outlines the safety equipment kept on site.

Table 3: Controls

Preventative Controls:
Work Permit Guidelines
Training, induction and instruction
Control of ignition sources on site
Segregation of incompatible substances
Alarmed/monitored stores
Mitigating Controls:
Fire hydrants and fire hose reels (water)
Portable fire extinguishers (dry chemical, foam, water)
Warden for initial control of fire and assistance to Emergency Services
Store/ Site spill and firewater containment capacities:
Emergency Recovery Bins containing equipment for spill management and recovery
Emergency Personal Protective Equipment (PPE) Kits in each Store
Emergency safety showers and eyewash stations
First Aid facility and Senior First Aid personnel
Emergency Response Procedures:

Stores constructed of non-combustible materials

Non-Emergency Equipment

Howard & Sons Pyrotechnics retains additional spill equipment and PPE inside the Administration Office and Warehouses which could be used a resource in the event of an emergency.

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

In accordance with Section 153D of the POEO Act, the plan is available to all site employees via dropbox and is a controlled copy.

This plan has also been placed on the internet. 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**



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

Appendix 1.1 - Incident Notification Record:

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

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"/> 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: _____

Email Address: _____

Other Contact Details / preferred method of contact: _____

Details of Complaint:

Person Preparing this Report: _____

Signature: _____

2. Details of Follow up:

Person responsible to follow up: _____

Follow up/ Response Plan:

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: _____

Reference Number: _____

APPENDIX 3 – Neighbouring Contact Details



APPENDIX 4 – Site Plans

