

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

## 1. Purpose

The Pollution Incident Response Management Plan (PIRMP) for Picton site has been prepared in accordance with WHSE-024 Environmental Management Plan including PIRMP, NSW Protection of the Environment Legislation Amendment Act 2014, Consent Conditions under NSW Dept of Planning, Industry and Environment, Site OEMP Operational Environmental Management Plan and the Site's EPA Licence.

The objectives of the PIRMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the site, the Environment Protection Authority (EPA), other relevant authorities and people outside the site who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the site by requiring identification of 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 implementing it, and ensuring that the PIRMP is regularly tested for accuracy, currency and suitability.

A copy of this PIRMP must be kept at the site at all times and must be made available to an authorised officer of the EPA NSW on request and to any person who makes a written request for a copy.

## 2. Site Implementation

**A copy of this PIRMP must be kept at the site at all times and must be made available to an authorised officer of the EPA NSW on request and to any person who makes a written request for a copy.**

**Site Management must follow the pre-emptive and responsive measures as per Section 4.12 of this procedure.**

**Testing of the PIRMP must be carried out annually.**

### 3.0 Responsibilities

Site Management shall ensure:

- As soon as a person becomes aware of a pollution incident, it must be immediately reported to a Site Supervisor/Manager whether or not it causes or threatens material harm to the environment so that the issue can be promptly considered and determined by the relevant Site Supervisor/Manager.
- The Site Manager must report all incidents to their relevant Senior Allied Pinnacle Manager & State and National WHS Manager if they can be promptly contacted.

If anyone in one particular level of authority cannot be promptly reached, contact should be made with the next level of authority.

All workers must report any environmental issues identified and to ensure the prevention of any environmental issues.

## 4.0 Method

### 4.1 What is "the Environment"?

The environment means components of the earth, including:

- **Land, air and water**
- **Any layer of the atmosphere**
- **Any organic or inorganic matter and any living organism**
- **Human-made or modified structures and areas**

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

## 4.2 Harm to the environment

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

It is important to remember that the “environment” is very broadly defined and an incident that only results in harm to a person or manmade structures could nevertheless be an environmental incident.

Harm to the environment is material if:

- a) It involves actual or potential harm to the health or safety of human beings or to an ecosystem that is not trivial; or
- b) It results in actual or potential loss or property damage, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by state regulations)

This is a very low threshold:

1. No actual harm is required, only threatened harm
2. The harm does not need to be significant, but only non-trivial
3. The \$10,000 measure (which includes any clean-up costs) is a separate and independent test for materiality and an incident may be reportable under (a) even if it does not meet (b).

## 4.3 Pollution incidents and the requirements to report

A 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 site.

Any pollution incident causing, or threatening material harm must be immediately reported to all relevant authorities.

## 4.4 Relevant Authorities

The relevant authority means any of the following:

- a) The appropriate state regulatory authority
- b) If the EPA is not the appropriate regulatory authority – the EPA
- c) If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs
- d) Each States Ministry of Health
- e) Each States WorkCover/Worksafe Authority
- f) Each States Fire and Rescue
- g) Each Sites Local Council

## 4.5 Relevant information

The relevant information about a pollution incident required must be provided to the relevant authority consists of the following:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known) and
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known

If any of the relevant information is not known when the initial notification is made to the relevant authority, but becomes known afterwards, that information must be notified immediately after it becomes known.

#### 4.6 Assessing whether an incident must be reported, and how to report

As soon as a person becomes aware of a pollution incident, it must be immediately reported if it causes or threatens material harm to the environment.

In considering whether or not an incident must be reported, a person must consider:

The likely impacts from the incident for example:

Are they trivial only, with no real risk of becoming anything more than trivial and not expected to result in \$10,000 of property damage or clean up costs? E.g. a spill of 1 tonne of flour in the premise’s car park, which can be cleaned up quickly and cheaply.

Are they trivial at the moment, but with the potential to become more than trivial? E.g. a spill of 20 tonnes of flour onto a dry riverbed that could take a day for site staff to clean up, when wet weather is imminently expected which could cause the river to fill and to carry the flour downstream.

Has any property damage been caused by the incident? What is the likely cost of the damage, combined with anticipated clean up cost – is it expected to be \$10,000 or more?

How should the incident be cleaned up and what are the likely costs of the clean up (are they likely to be \$10,000 or more?).

Where workers are unsure about whether or not an incident involves material harm to the environment, they must immediately report it to the relevant Site management so that this issue can be promptly considered and determined by the relevant Site management.

Contractors and site workers are not required to form a view about whether any environmental incident is a reportable pollution incident and should notify site management of **all** environmental incidents so that this issue can be considered at a higher level.

The Site Manager will have authority to report all incidents on behalf of Allied Pinnacle, after attempting to first discuss with their relevant General Manager, State and National WHS Manager if they can be promptly contacted.

In the event of uncertainty as to whether or not the incident is causing or threatening material harm to the environment, contact should be made with the General Manager and the issue should be considered at this level.

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

If the uncertainty cannot be resolved, the incident should be treated as a reportable incident.

In the unlikely event that no one within senior management is able to be contacted with reasonable promptness, the Site manager must report any incident causing or threatening material harm to the environment to the relevant authorities themselves.

#### 4.7 Contact Details – Relevant Authority

If the pollution incident presents an immediate threat to human health or property, call Triple Zero (000).

If the incident does not require an initial combat agency, or once Triple Zero has been contacted, notify the relevant authorities in the following order:

Relevant Authority	Contact Details
Environmental Protection Authority	131 555
NSW Dept of Planning, Industry and Environment (Only as per any breaches of Consent Conditions)	1300 305 695
Wollondilly Shire Council	(02) 4677 1100
Ministry of Health NSW	General 1300 066 055 Wollongong Office (02) 4221 6700
WorkSafe Authority NSW	13 10 50
Fire and Rescue NSW	1300 729 579

#### 4.8. Contact Details - Site

The following individuals must be contacted immediately in the event of a pollution incident and are responsible for activating the PIRMP and managing the response.

Name	Position	24-Hour Contact Details
<b>Henry Fouche</b>	Site Mill Manager	0424 973 415
<b>Mark Hughes</b>	Site Maintenance Manager	0421 816 538
<b>Dominika Paldyna</b>	NSW WHSE Coordinator	0413 053 957
<b>Rachid El Khayam</b>	Head of Milling and Mixing	0402 548 780
<b>Maria Hooker</b>	National WHSE Manager	0401 700 860
<b>David Pitt</b>	Chief Executive Officer	0419 756 775

#### 4.9 Contact with Neighbours and the Local Community

The site is in a rural area with no neighbours in close proximity where pollutants in Section 4.12 can cause extreme concern.

After raising an alarm and ensure that the emergency services are notified if required, the Site Manager or Designated person, if required, will contact the neighbouring properties of the incident by phone or in person.

Note: due to the location of the site the closest resident is approximately more than 500 metres away.

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

Note: Refer to **WHSE-019 Emergency Management** and **Picton WHSE-005 Picton Emergency Response Plan** on full steps to follow as per different types of incidents.

Advise neighbours to standby for further instructions by NSW Police or Fire Brigade Officers if required.

Also, advise neighbours to close windows and doors and remain inside for incidents involving the emission of air pollutants or chemical leaks.

#### 4.10 Inventory of Pollutants

Grain	Up to 45,000 tonnes
Finished product	Up to 4500 tonnes
Chlorine	Up to 560kg
LPG	2 x 250 litre tanks, 4 x 18 litre gas cylinders
Oil	200 litres (maximum)

#### 4.11 Safety Equipment

The following safety equipment or devices that are used to minimise the risks to human or health or the environment and to contain or control a pollution incident are as follows

##### 4.11.1 Dust – Grain and Flour

Dust Collectors and Extraction systems are located in the Grain Intake, Screening process, Mill, Mixing, and Packing area which are regularly inspected and maintained and included on the site Preventative Maintenance Schedule. Records are retained on site.

##### 4.11.2 Noise

Noise is minimised through the milling and mixing process with engineering controls on plant and equipment and most plant and equipment is used in an enclosed area. Minimal noise from truck and forklift movement.

##### 4.11.3 Chlorine

Chlorine is stored and locked in suitable area.

##### 4.11.4 Spill Kits

Spill Containment kits are located in the following areas:

**Large spill kit (240L):** Warehouse (dispatch dock)  
Admin Building (outside lunch room)  
Outloading Bay (wheat flour dispatch)

**Small spill kits (120L):** Maintenance Workshop  
Wheat Intake Area – rail

**Other spill kits:** Mill Control Room – Chlorine leak Protection Gear  
Lab – Hazardous Chemical Absorb kit

Only trained persons in spill control procedures will engage in spill containment.

Spill Containment Kits shall be inspected every three months.

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

#### 4.11.5 Personal Protective Equipment

- Gas monitors available for use
- Respiratory equipment available for use
- Hand protection, eye protection

#### 4.11.6 Safety Data Sheets

Safety Data Sheets (SDS) detailing action to be taken to safely control spills of hazardous materials and dangerous goods are available where hazardous chemicals are used.

#### 4.11.7 Extinguishers and Hose Reels

Fire extinguishers and hose reels are provided for first attack fire fighting, when safe, by workers trained in their use.

Extinguishers, hoses, and hydrants will be tested at least six monthly in accordance with the relevant Australian Standard (e.g. AS1851 for extinguishers).

#### 4.12 Hazard Identification, Risk Analysis and Management measures

Risks are calculated using the Potential Severity Matrix in Policy WHSE-008 Hazard ID, risk assessment and control measures.

Potential Severity Matrix					
Most likely consequence	Likelihood				
	Almost certain will occur	Good chance could occur	Likely to occur	Unlikely to occur	Extremely unlikely to occur
Disastrous	25	24	22	19	15
Critical	23	21	18	14	10
Serious	20	17	13	9	6
Significant	16	12	8	5	3
Minor	11	7	4	2	1



**Picton WHSE-001 Picton Pollution Incident Response Management Plan**

Version No:	<b>V07</b>
Issued:	<b>16 Apr 2024</b>
Next Review	<b>Apr 2025</b>

Hazard	Impact	Risk	Circumstances/events that increase or decrease likelihood of risk	Management measures
Noise	Minor short term harm to the environment.	Likely to occur, Minor Cat 4	Not complying with the applicable environmental noise limit criteria as defined within the NSW Protection of the Environment Operations (Noise Control) Regulation 2017 and Site EPA Licence	<p><u>Pre-emptive measures</u></p> <ul style="list-style-type: none"> <li>A noise survey must be completed every three years by a qualified external Contractor in accordance with NSW Protection of the Environment Operations (Noise Control) Regulation 2017 and all recommendations to be implemented.</li> <li>All plant and equipment will be maintained according to the preventative maintenance schedule and kept in good working order to minimise noise emissions.</li> <li>Noise emissions from the operations at Allied Pinnacle must not exceed the applicable environmental noise limit criteria as defined within the NSW Protection of the Environment Operations (Noise Control) Regulation 2017</li> </ul> <p><u>Responsive measures:</u></p> <ul style="list-style-type: none"> <li>Incident must be immediately reported to site management. Relevant authorities to be notified immediately as required.</li> <li>An incident report must be completed within 24 hours.</li> <li>At fault equipment to be repaired and reinstated when noise limits can be met.</li> <li>A noise survey <u>may</u> be required to be completed by a qualified external Contractor in accordance with NSW Protection of the Environment Operations (Noise Control) Regulation 2017 to ensure all recommendations have been implemented.</li> </ul>
Dust	Minor short term harm to the environment.	Likely to occur, Minor Cat 4	Dust extraction and collection systems are installed on site to minimise dust exposure and meet Part 5 of the Protection of the Environment Operations (Clean Air) Regulation	<p><u>Pre-emptive measures</u></p> <ul style="list-style-type: none"> <li>Air monitoring to be carried if required by a qualified external Contractor in accordance with Part 5 of the Protection of the Environment Operations (Clean Air) Regulation and all recommendations to be implemented.</li> <li>All activities in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust</li> </ul> <p><u>Responsive measures:</u></p> <ul style="list-style-type: none"> <li>Incident must be immediately reported to site management. Relevant authorities to be notified immediately as required.</li> <li>An incident report must be completed within 24 hours.</li> <li>At fault equipment to be repaired and reinstated when dust limits can be met.</li> <li>Air monitoring may be required by a qualified external Contractor in accordance with Part 5 of the Protection of the Environment Operations (Clean Air) Regulation to ensure all recommendations have been implemented.</li> </ul>
Grain spill	Insignificant harm to the environment.	Extremely Unlikely to occur, Minor Cat 4 (1)	Nature of product is not mobile to flow down to watercourse to cause exposure pathway to offsite impacts	<p><u>Pre-emptive measures:</u></p> <ul style="list-style-type: none"> <li>Ensure Delivery drivers are trained in the use of receival equipment.</li> <li>Train all relevant personnel in the use of spill kits.</li> <li>Ensure provision of spill containment kits.</li> </ul> <p><u>Responsive measures:</u></p> <ul style="list-style-type: none"> <li>Stop the flow of the product from the source.</li> <li>Use of spill containment kits.</li> <li>If possible, bund any drainage of spilled material to prevent from entering sewers, and work pits, or any place where its accumulation can be dangerous</li> </ul>



**Picton WHSE-001 Picton Pollution Incident Response Management Plan**

Version No:	<b>V07</b>
Issued:	<b>16 Apr 2024</b>
Next Review	<b>Apr 2025</b>

Flour spill	Minor short term harm to the environment.	Likely to occur, Minor Cat 4 (4)	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p><u>Pre-emptive measures:</u></p> <ul style="list-style-type: none"> <li>Installation of Storm guards in all areas where stormwater collection occurs</li> <li>All storm water drains to be marked with blue paint to clearly identify and raise awareness of stormwater infrastructure from other water drainage infrastructure at the site</li> <li>Signage to be displayed to remind workers and contractors to not wash down vehicles, equipment or pavement</li> <li>Regular monthly inspections of all stormwater sump pits to ensure there is no build up of product, residue, etc.</li> <li>Complete daily, weekly &amp; monthly cleaning and maintain documented cleaning checklists for areas identified on the Stormwater Maps</li> <li>Ensure provision and use of spill containment kits</li> <li>Train all relevant personnel in the use of spill containment kits and site management practices</li> <li>Any potential build up must be reported and recorded on maintenance request form. Maintenance Dept. to action and address</li> </ul> <p><u>Responsive measures</u></p> <ul style="list-style-type: none"> <li>Stop the flow of the product with use of Spill kits</li> <li>Site staff must report incident to the Site Management immediately, and an incident notification record must be produced within 24 hours of the incident</li> <li>The incident must be immediately reported to relevant authorities as required.</li> <li>Incident investigation must advise suitable controls to be implemented and to prevent recurrence</li> </ul>
LPG leak	Minor short term harm to the environment.	Likely to occur, Minor Cat 4 (4)	Leak could occur in out loading area which is in the open air.	<p><u>Pre-emptive measures:</u></p> <ul style="list-style-type: none"> <li>LPG stored according to Safety Data Sheets (SDS)</li> <li>LPG cylinders serviced by supplier</li> <li>Train all relevant personnel on how to turn off cylinder valve</li> </ul> <p><u>Responsive measures:</u></p> <ul style="list-style-type: none"> <li>If any leakage is detected or suspected from a cylinder, turn it off immediately by turning off the cylinder valve</li> <li>Complete any repairs required if necessary</li> </ul>
Water pollution from Spills Entering Stormwater	Moderate Medium Term Harm to the environment	Likely to occur, Serious Cat 3 (13)	<p>Installation of Storm guards in all areas where stormwater collection occurs</p> <p>All storm water drains to be marked with blue paint to clearly identify and raise awareness of stormwater infrastructure from other water drainage infrastructure at the site</p> <p>Must comply with Section 120 of the Protection of the Environment Operations Act 1997.</p>	<p><u>Pre-emptive measures</u></p> <p>Follow the Pre-emptive measures that are in place for pollutants that could possibly enter stormwater as per flour spill.</p> <p><u>Responsive measures</u></p> <p>Follow the responsive measures that are in place for pollutants that could possibly enter stormwater as per flour spill.</p>
Mechanical Oil spill	Minor short term harm to the environment.	Likely to occur, Minor Cat 4 (4)	Spill could occurs near a watercourse, providing exposure pathway for offsite impacts.	<p><u>Pre-emptive measures</u></p> <ul style="list-style-type: none"> <li>Provision and use of spill containment kits.</li> <li>Train all relevant personnel in the use of spill kits</li> <li>Storage of oils in isolation areas with suitable bunding. Bunding must be provided around the oil tank, with a minimum capacity of 110% the volume of the tank.</li> </ul> <p><u>Responsive measures</u></p> <p>Follow the responsive measures that are in place for pollutants that could possibly enter stormwater as per flour spill.</p>



	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>		Version No:	<b>V07</b>
			Issued:	<b>16 Apr 2024</b>
			Next Review	<b>Apr 2025</b>

<b>Chemical leak</b> Chlorine	Moderate medium term harm to the environment.	Likely to occur, Critical Cat 2 (18)	Leak could occur in relevant areas which are in the open air.	<p><u>Pre-emptive measures:</u></p> <ul style="list-style-type: none"> <li>Chlorine to be stored according to Safety Data Sheets (SDS)</li> <li>Dosing areas have quenching system</li> <li>Operators trained in handling Chlorine and emergency incident</li> <li>Cylinders to be maintained by Supplier</li> </ul> <p><u>Responsive measures:</u></p> <p><u>Minor Leaks</u></p> <ul style="list-style-type: none"> <li>All personnel must be removed from the area to an up wind position</li> <li>Trained personnel, wearing full BA equipment and gloves should enter Chlorine room and close off all gas cylinders</li> <li>The leak can then be found and then repaired</li> </ul> <p><u>Major Leaks</u></p> <ul style="list-style-type: none"> <li>Sound alarm</li> <li>All persons must be evacuated as per fire evacuation procedures by sounding alarm</li> <li>Relocate assembly point if it is situated down wind of a leak</li> <li>Call Chlorine provider and EPA and notify them that there is a major chlorine gas leak on site</li> <li>Relevant authorities to be notified immediately</li> <li>An incident report must be completed within 24 hours.</li> </ul>
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#### 4.13. Minimising Harm to Persons of the Premises

##### 4.13.1 Emergency evacuation

Upon hearing the alarm, the following needs to be considered:

- Ascertain the nature of the emergency and determine appropriate action.
- Ensure that the appropriate emergency service has been notified.
- Advise staff of the situation.
- Meet emergency services at evacuation area: **Behind Water Tank in Truck parking area**

##### 4.13.2 Emergency Equipment

Equipment has been installed around the site for use in response to emergencies.

It shall be maintained and accessible for immediate use, and its location appropriately sign posted.

The range of equipment installed at the Site is detailed in the site emergency plans displayed throughout the site.

##### 4.13.3 Alarm

The on-site alarm system can be triggered manually by pressing switches located around the site and also automatically by smoke and loss of water pressure in hydrants/sprinklers.

The alarm is audible throughout the site.

##### 4.13.5 Emergency Exits

Backlit emergency exit signs are installed within all parts of the building.

These “lights” are designed with an internal battery supply and operate independently of the main power system in an emergency situation.

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

#### 4.13.6 Minor Chemical Spills

- Minor spills should be dealt with immediately as detailed in the Safety Data Sheets.
- If a spill has occurred due to a plant problem or failure the Supervisor(s) or Operator(s) are to be advised so the problem can be contained & remedied.

#### 4.13.7 Major Chemical Spills

In the event of a major chemical spill the following procedure is to be adopted:

- Notify all personnel in the area that a spill has occurred. Where danger exists from spread of spill, the area should be evacuated immediately.
- One person to be detailed (if safe to do so) to notify the Supervisor(s) or Operator(s) who will immediately assess the need for outside assistance.
- Personnel dealing with chemical spills must wear the designated protective clothing, breathing apparatus etc. & have knowledge in using spill kits
- Initial action in controlling the spill should be directed towards closing off the source of the spill.
- Secondary action should be directed towards preventing the spread of the spill to other parts of the plant or outside the plant boundaries or into council drains.
- Once the spill is contained the material should be neutralised and then disposed of as detailed in the Safety Data Sheet.

#### 4.14. Staff training

A general training in emergency preparedness shall be provided to all site workers on the following as a minimum:

- Definition and types of emergency
- Emergency facilities, their function, location and how to use them
- Means of communication and the location of communication facilities
- Actions in case of emergency
- Evacuation procedures

Specific training shall be provided to the appropriate staff on:

- First aid (training company)
- Use of site supplied firefighting equipment (training company) FAA
- Use of supplied spill containment and clean up equipment (internal)

The relevant training shall be provided to all new workers at the start of their employment.

Retraining must be provided annually, and the training of each worker shall be recorded, and the records of training shall be retained in Allied Pinnacle Training Database.

#### 4.15. Testing of the PIRMP

Testing of the PIRMP must be carried out annually.

Whenever a scheduled mock evacuation occurs, the Chief Warden or designated person must notify the relevant authorities to ensure they do not attend the site.

Following an evacuation, a review will occur.

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

The following should be evaluated:

- Appropriateness of alarm
- If the alarm was heard by everyone
- Time took for completing roll calls
- Detail manner in which plan is to be tested and maintained.
- How was the communication process
- If fire doors were closed
- If gates were opened
- If everyone was accounted at evacuation point
- If personnel protection equipment was used
- Role of fire wardens
- Time took for completing the drill
- The evacuation must be reported in Allied Pinnacle’s Incident Reporting Database and any corrective actions to be raised following mock evacuation if there were any issues.

**Refer to WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work**

The PIRMP shall be evaluated by simulated emergencies.

## **8. Dispute Resolution**

This section is in reference to DP 731013 Development Plan for the site.

In the event that a dispute arises between Allied Pinnacle and Council or Allied Pinnacle and a public authority other than the Department, in relation to a specification or requirement applicable under this consent for DP 731013, the matter shall be referred by either party to the Director-General, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding on all parties.

For the purpose of this condition, "public authority" has the same meaning as provided under section 4 of the Act.

### **Related Documents**

- **WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work**
- **WHSE-019 Emergency Management**
- **WHSE-024 Environmental Management Plan including PIRMP**
- **WHSE-008 Hazard ID, risk assessment and control measures**
- **Picton WHSE-005 Picton Emergency Response Plan**

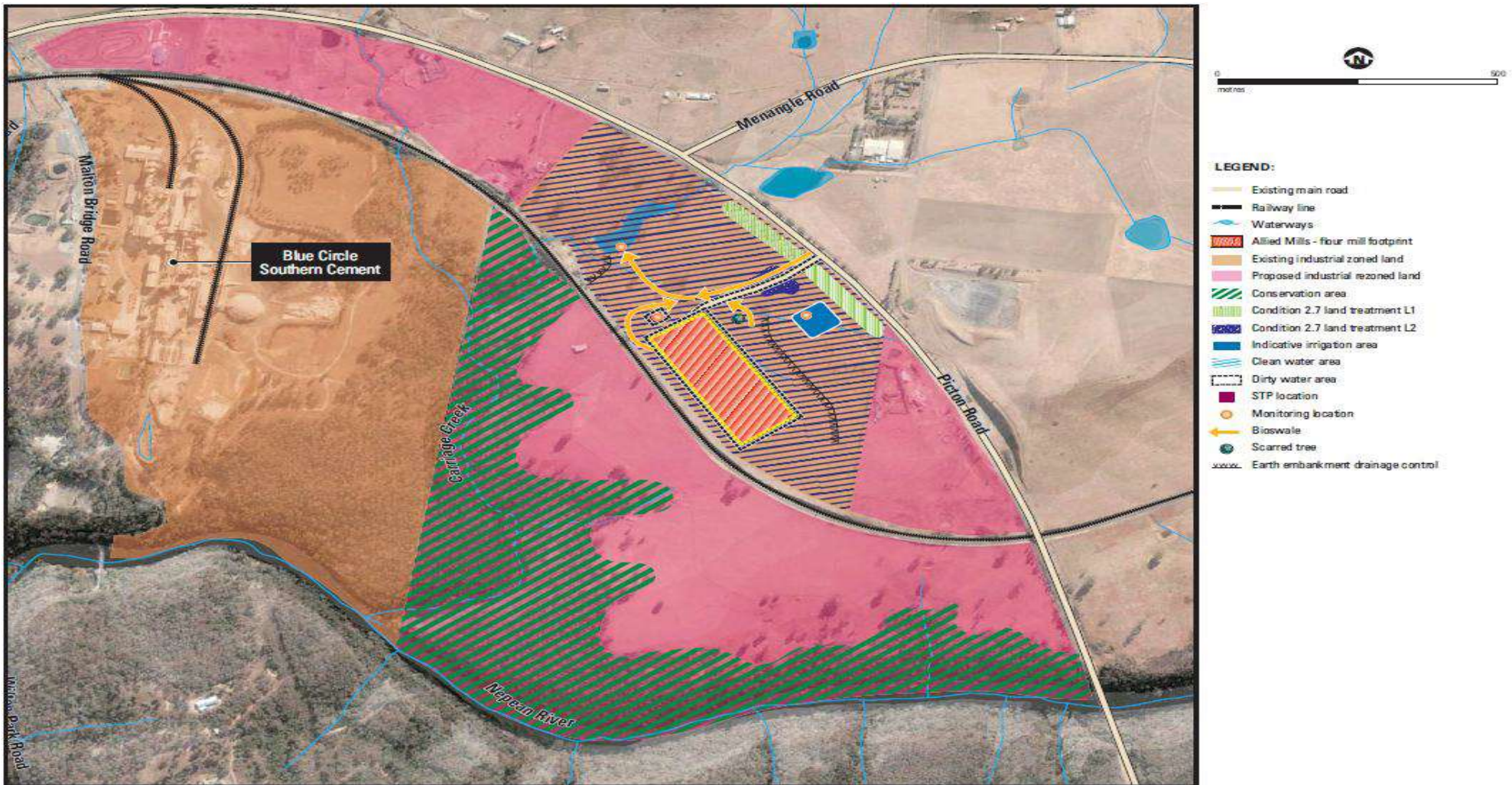
	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

**DOCUMENT APPROVAL and CHANGE HISTORY**

APPROVAL			
Action	Position Title	Name (s)	Date
New Document template controlled Version 2 to update to new format	National WHSE Manager	Maria Hooker	13/11/2018
Change to contact persons and to V03	National WHSE Manager	Maria Hooker	13/01/2020
Change to contact persons and to V04	National WHSE Manager	Maria Hooker	10/11/2020
Updated to next Version 05 with contact person changes and review date to annually	National WHSE Manager	Maria Hooker	15/11/2022
Add new logo and update contacts updated to V06	National WHSE Manager	Maria Hooker	19/4/2023
Reviewed annually, updated to V07	National WHSE Manager	Maria Hooker	16/4/2024

	<b>Picton WHSE-001 Picton Pollution Incident Response Management Plan</b>	Version No:	<b>V07</b>
		Issued:	<b>16 Apr 2024</b>
		Next Review	<b>Apr 2025</b>

**Location of Any Stormwater Drains on the Premises, and Discharge Locations of Any Stormwater Drains to the Nearest Watercourse or Water Body**





**Picton WHSE-001 Picton Pollution  
Incident Response Management Plan**

Version No:	<b>V07</b>
Issued:	<b>16 Apr 2024</b>
Next Review	<b>Apr 2025</b>

