Porta Products Pty Ltd
ABN 31 003 246 357

2 Wella Way
Somersby NSW 2250
Australia

BOMBALA MILL
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Environment Protection Licence (EPL) Number: 11205

Date of Issue: 25 May 2026

Name of approving officer	Glen Hampshire
Title of approving officer	Manager
Signature of approving officer	
Date	25 May 2026

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GLOSSARY

Term	Definition
CCA	Copper Chrome Arsenate
IBC	Intermediate Bulk Container
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence under the POEO Act
Incident	A set of circumstances that causes or threatens to cause material harm to the environment, and/or breaches or exceeds the limits or performance measures/criteria in this approval
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Porta	Porta Products Pty Ltd
Pollution Incident	An incident or set of circumstances during, or as a consequence of which, there 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 does not include an incident or set of circumstances involving only the emission of any noise.
(the) Project	Bombala Sawmill

1 INTRODUCTION

Porta Products Pty Ltd (Porta) holds an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for the Bombala Sawmill and timber processing facility located at 1 Sandy Lane in Bombala, NSW. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

Copies of this plan are kept at the licensed premise within the Workshop, Green Mill, Treatment plant and the production office. In addition, the plan can be viewed at: https://www.porta.com.au/documents/environmental-reports

This plan has been developed in accordance with EPA's Guideline for Pollution Incident Response Management Plans (2022).

2 LICENCE DETAILS

Licence details are provided within Table 1, below.

Table 1: Licence Details

Name of Licensee:	Porta Products Pty Ltd **ABN:** 31 003 246 357
EPL Number:	11205
Premises name and address:	Bombala Sawmill and timber processing facility 1 Sandy Lane, Bombala NSW 2632
Company contact details:	**Name:** Victor Bendevski **Position:** Environmental and Regulatory Compliance **Business hours contact number:** (02) 4340 9827 **After hours contact number:** 0410 327 635 **Email:** bendevskiv@borgs.com.au
Website address:	https://www.dongwha.com/au/main/main.asp
Scheduled activity/activities on EPL:	Wood or timber milling or processing Wood preservation
Fee-based activity/activities on EPL:	Wood or timber milling or processing Wood preservation

3 POLLUTION INCIDENT NOTIFICATION

The following table, Table 2, provides contact details for pollution incident notification.

Table 2: Contact Details for Pollution Incident Notification

Action	Contact Details
PIRMP activation	**Name of person responsible**: Glen Hampshire **Position:** Manager **Business hours contact number:** (02) 6459 5544 **After hours contact number**: 0408 583 936 **Email:** hampshireg@porta.com.au **Name of alternative person responsible:** William Fleming **Position:** Work Health,Safety and Environment Officer **Business hours contact number: (**02) 6459 5543 **After hours contact number**: 0448 805 349 **Email:** flemingw@porta.com.au
Notification of relevant authorities (Note: Notification will be made by a person with an appropriate level of authority within the company)	**Name of person responsible**: Victor Bendevski **Position:** Environmental and Regulatory Compliance **Business hours contact number:** (02) 4340 9827 **After hours contact number**: 0410 327 635 **Email:** bendevskiv@borgs.com.au **Name of alternative person responsible**: Glen Hampshire **Position:** Manager **Business hours contact number:** (02) 6459 5544 **After hours contact number**: 0408 583 936 **Email:** hampshireg@porta.com.au
Managing response to pollution incident	**Name of alternative person responsible:** William Fleming **Position:** Work Health, Safety and Environment Officer **Business hours contact number:** (02) 6459 5543 **After hours contact number**: 0448 805 349 **Email:** flemingw@porta.com.au **Name of alternative person responsible**: Glen Hampshire **Position:** Manager **Business hours contact number:** (02) 6459 5544 **After hours contact number**: 0408 583 936 **Email:** hampshireg@porta.com.au

The following relevant authorities are required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment:

- Fire and Rescue NSW and/or Rural Fire Service as applicable: Phone 000 (first notification), general enquiries (02) 9265 2999
- EPA: Phone 131 555
- The Ministry of Health via Goulburn Public Health Unit: Phone (02) 4824 4944, after hours (02) 6053 4800
- SafeWork NSW: Phone 131 050
- Local Council - Snowy Monaro Regional Council – 1300 345 345

In addition, the Department of Planning, Housing and Infrastructure (DPHI) may need to be notified of an incident in accordance with the Project Approval.

When notifying authorities that a pollution incident has occurred, the following information must be provided:

1. The time, date, nature, duration and location of the incident;
2. The location of the place where pollution is occurring or is likely to occur;
3. The nature, estimated quantity or volume and the concentration of any pollutants involved, if known;
4. The circumstances in which the incident occurred (including the cause of the incident, if known); and
5. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If information required in items 3, 4 and 5 are not known when the initial notification is made but becomes known afterwards, that information must be provided to the authority immediately after it becomes known.

These early warning and updates will ensure the stakeholders have the information needed to minimise any risk of harm from the incident.

All information that is communicated to external stakeholders must be authorised by Glen Hampshire (Primary Contact as listed within Table 2). Decisions to notify neighbours and the local community will be made in consultation with regulatory authorities. There are two close residential neighbours; one is located approximately 400m northeast of the site ("The Parsonage" at 15 Delegate Road, Bombala) and one is located approximately 300 metres west of the site (114 Wedmore Road, Bombala). There is also one commercial neighbour, Straw services (sawdust supplier), located adjacent to the west of the site on Delegate Road.

Stakeholders that may require notification include:

- Neighbours, local landowners and community representatives;
- Porta employees and family members;
- Media; and
- Insurers and lawyers.

Communication to the community would be via one or more of the following methods:

- Personal visits;
- Letter box drops and newsletters;
- Emails to community representatives;
- Local radio announcements;
- Newspaper advertisements; and
- Telephone calls, SMS or other messaging systems.

4 DESCRIPTION AND LIKELIHOOD OF HAZARDS

A risk assessment of the licenced premises has been conducted to identify potential hazards to human health or the environment that require management to minimise potential for an incident.

Details of the risk matrices are provided below in Tables 3-6.

Table 3: Risk Matrix

Risk	Likelihood	Consequence	Risk Rating	Action
Oil, or other potential contaminant, spill	Possible	Insignificant	Low	Clean–up using spill kits
Forklifts or other authorised vehicle on site hitting above ground self-bunded diesel tank and potentially causing a leak of diesel fuel.	Possible	Insignificant	Low	Clean-up
Raised dust on site and leaving the site	Likely	Moderate	High	Water cart to be used regularly
Overflow of effluent storage septic tanks	Rare	Insignificant	Low	Clean–up. Waste contractor engaged to transport waste off site for disposal.
CCA Oxide liquid spillage	Possible	Minor	Medium	Clean up using spill kits
H2F liquid Spillage	Possible	Minor	Medium	Clean up using spill kits

Table 4: Rating of Consequences for Risk Matrix

Level	Descriptor	Consequences examples
1	Catastrophic	Long-term environmental damage (5 years or longer), requiring $5 million to correct
2	Major	Medium-term (1-5 years) environmental damage, requiring $1 to 5 million to correct
3	Moderate	Short-term (less than 1 year) environmental damage, requiring $150,000 to $1 million to correct
4	Minor	Environmental damage, requiring up to $100,000 to correct
5	Insignificant	Negligible environmental impact, managed within operational budget

Table 5: Rating of Likelihood for Risk Matrix

Level	Descriptor	Likelihood of the risk arising and leading to the assessed level of consequence	Frequency
A	Almost certain	Is expected to occur in most circumstances and has a history of occurrence	Once a year or more frequent
B	Likely	Will probably occur in most circumstances	Once in 1 to 3 years
C	Possible	Could occur at the same time	Once in 3 to 10 years
D	Unlikely	Not Likely to occur in normal circumstances	Once in 10 to 50 years
E	Rare	May occur only in exceptional circumstances	Once in 100 years or more

Table 6: Risk Rating

	Consequences				
Likelihood	Catastrophic 1	Major 2	Moderate 3	Minor 4	Insignificant 5
Almost certain A	Extreme	Extreme	High	High	Medium
Likely B	Extreme	Extreme	High	Medium	Low
Possible C	Extreme	High	Medium	Medium	Low
Unlikely D	High	Medium	Medium	Low	Low
Rare E	High	Medium	Low	Low	Low

4.1 Chemical Hazards

Copper Chromium Arsenate (CCA) Wood Preservative and Impretect CS (CCA Oxide) have been identified as chemical hazards.

CCA can create a significant environmental hazard and is classified as a Dangerous Good by the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (ADG Code) and under relevant State Legislation. CCA is a waterborne chemical and is not flammable. However, heating of the liquid can produce toxic vapors so care must

be taken in the event of a fire at the plant. In liquid form, CCA Wood Preservatives are acidic with a pH range from 1.0 to 2.6. The constituents of CCA will form insoluble complexes with an increase in pH, therefore becoming less mobile in alkaline conditions.

CCA Oxide is classed as a Dangerous Good (class 8, sub-risk 6.1) and hazardous substance and should be handled with caution. All efforts are made when handling CCA Oxide to minimise human contact as it can prove toxic to humans by ingestion, inhalation and skin contact.

4.2 Other Hazards

Other potential, non-chemical, hazards include:

- General hazards associated with the workshop;
- Above ground self-bunded diesel tank;
- Dust generated on site; and
- Effluent storage in septic tanks.

4.3 Additional Circumstances

Porta has considered other circumstances that may contribute to a pollution incident. These circumstances could include:

- Power Failure;
- High Winds;
- Localised fire or bushfire; and
- Flooding.

5 PRE-EMPTIVE ACTIONS TO BE TAKEN

The following list includes pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

- An Environmental Management Strategy is in place with quality assurance and quality control programs and preventative maintenance procedures;
- The above-ground diesel storage tank is self-bunded and bunding is provided where liquids are stored. IBC's are stored in a slightly elevated position in order to minimise potential damage as well as allow staff to identify any leaks. These measures are discussed further in Section 6 of this report;
- Alarms and notification systems are located in the Green Mill, Satellite, Dry Mill and other areas;
- The use of UHF radios has been implemented to allow for efficient alerts to be sent to responsible personnel in the event of an incident;
- Standard Operating Procedures (SOPs) have been developed for use on site. The SOPs are maintained by the on-site WHS officer;
- Some areas have restricted access and can only be accessed by more specifically trained and qualified personnel;
- Spill containment kits are maintained and located at different parts of the site;
- Stormwater cut-off valves and fire water tanks are present on-site;

- Testing of air emissions, noise, soil, surface water and groundwater are completed in accordance with the EPL licencing requirements.;
- Noise implementation strategies have been introduced to the site in order to mitigate noise levels to surrounding residences and Porta remains committed to trialling new technologies in an endeavour to further reduce the impacts where feasible. Mitigation measures include implementation of a noise barrier wall for the log sorting line, an enclosure for the wood-chipper, a rolling shutter door for the Satellite and Dry Mill production facilities and investment into a natural acoustic sound barrier at the outskirts of the site;
- Stormwater on site is managed by capturing all stormwater generated at the site in three ponds, i.e. Northern Pond, Pond 1 and Pond 2. In addition, ground contours, silt trap and automatic pumps have been installed as part of the development. The automatic pump will assist the flow of water from Pond 1 into Pond 2 to avoid overflow. In the event of an emergency/flood, Pond 1 will offer additional storage capacity. In combination, both Pond 1 and Pond 2 can contain uncontaminated water, and will have sufficient capacity to contain a 144-hour rainfall event. While the Northern Pond has the potential to capture contaminated storm water, it also has sufficient storage capacity to capture a 1 in 100, 72-hour storm event, of which there is only a 1% chance;
- Wastewater streams are managed on site and considered as an integral process. Wastewater streams include condensate generated from redry kilns and boilers, sewage generated on site and CCA waste generated within the treatment plant;
- A dedicated water cart is used for dust suppression purposes to manage dust at the site. The water cart uses water from the on-site dam and roads and affected areas are sprayed daily unless there is sufficient rainfall. ;
- Street sweeping of the site's exit road, where heavy vehicles exit, is completed as necessary. During summer, the street sweeping program is reviewed and adjusted as required; and
- Regular environmental checklists are completed by the leading hands of each milling/processing department and independent environmental audits are undertaken every three (3) years. Internal systems and procedures are routinely updated to remain practical and valid.

6 INVENTORY OF POLLUTANTS

The following section provides information regarding pollutants stored at the site. There are five (5) locations where hazardous materials are stored on the site and details including type of goods, UN #, class, packing group, Hazchem code, maximum capacity and typical capacity for each location are provided in the tables following. The locations are also shown on a site plan presented as Figure 1 in Section 10 of this report.

Location 1

Fully bunded roofed bunker

Goods	UN #	Class	Packing Group	Hazchem Code	Max Capacity	Typical Capacity

Protim Optimum RTU (Hi-Flash) LOSP	UN 3082		III	3Z	70,000L Steel Vertical Tank	70,000L
CCA Oxide Work Solution	N/A	N/A	N/A	N/A	70,000L Steel Vertical Tank	70,000L
Osmose Sarmix Oxcell C680o	UN 2922		III	2X	26,000L Stainless Steel Vertical Tank	17,000L
Osmose Micropro Work Solution	N/A	N/A	N/A	N/A	70,000L Steel Veritical Tank	70,000L

Location 2

Bunded roofed store

Goods	UN #	Class	Packing Group	Hazchem Code	Max Capacity	Typical Capacity
Osmose Micropro 200c	UN 3082		III	2X	12,000L (12 x 1000L) IBC's	12,000L
Koppers CMIT 14%	UN 2922		II	2XE	2,000L (2 x 1000L IBC's)	2,000L
Micronised Tebuconazole (73G/L) Pre-Mix	UN 3082		III	•3Z	10,000L (10 x 1000L IBC's)	5,000L

Location 3

Self-Contained Storage

Goods	UN #	Class	Packing Group	Hazchem Code	Max Capacity	Typical Capacity
Diesel	UN 3082		III	NA	70,000L Self-Bunded Steel Tank	45,000L

Location 4
Bunded roofed store

Goods	UN #	Class	Packing Group	Hazchem Code	Max Capacity	Typical Capacity
Koppers H2F Timber Preservative	UN 3082		III	•3Z	1000L IBC	1000L
Koppers H2F Work Solution	N/A	N/A	N/A	N/A	3000L (3 x 1000L IBC's)	3000L

Location 5
Self-Contained Storage

Goods	UN #	Class	Packing Group	Hazchem Code	Max Capacity	Typical Capacity
Protim Optimum RTU (Hi-Flash) LOSP	UN 3082		III	•3Z	50,000L Self-Bunded Steel Tank. Safe fill 48,000L	48,000L

7 SAFETY EQUIPMENT

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

- Personal protective equipment including hazmat suits, face masks and shields, hard hats, chemical-specific gloves;
- Tank gauges and high/low level switches to minimise potential for overflows resulting in uncontrolled product release;
- Audible alarms and instrumentation;
- Fire suppression and fire-fighting equipment. In addition, all areas have a noted Fire Warden;

- Safety data sheets and product labelling;
- Eye-wash stations and showers;
- Emergency backup generator for the biomass boiler and main office; and
- Safety equipment and other devices.

8 COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

During an emergency situation, it may be necessary to communicate the state or type of emergency, the possible cause, its effects/consequences, likely duration and impact to potential stakeholders. These early warning and updates will ensure the stakeholders have the information needed to minimise any risk of harm from the incident.

There are two close residential neighbours; one is located approximately 400m northeast of the site ("The Parsonage" at 15 Delegate Road, Bombala) and one is located approximately 300 metres west of the site (114 Wedmore Road, Bombala). There is also one commercial neighbour, Straw services (sawdust supplier), located adjacent to the west of the site on Delegate Road.

Communication to the community would be via one or more of the following methods:

- Personal visits;
- Letter box drops and newsletters;
- Emails to community representatives;
- Local radio announcements;
- Newspaper advertisements; and
- Telephone calls, SMS or other messaging systems.

9 MINIMISING HARM TO PERSONS ON THE PREMISES

The following arrangements are in place to minimise the risk of harm to any persons who are on the premises or who are present:

- All personnel and visitors are required to complete a Site Induction prior to entering the site. This induction covers information such as site hazards and associated mitigation measures, emergency procedures including location of muster points, communications protocols and incident reporting protocols;

- In the event of an emergency chemical spill of CCA Wood Preservative, the following equipment will be made readily available to contain the spill and minimise impacts to human health:
    - Personal protective equipment;
    - Witches hats and bunting to mark out emergency areas and to keep unauthorised personnel out of the area;
    - Dry sand, earth, vermiculite or other clean, dry inert material of sufficient quantity to create containment bunding around potential spill areas;
    - Lime of sufficient quantity to cover spill areas so as to neutralise potential pollutants;
    - Shovels and brooms for placement/management of spill clean-up materials and containment measures;
    - Sheets of plastic to cover drains in the event that spilt materials could enter drains; and

- Approved containers/drums to store recovered wastes.

10 MAPS

Figure 1: *Porta Hazardous Materials Locations*
GPS Co-ordinates Latitude: -36.93048 Longitude: 149.21133

11 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

In the event of an emergency chemical spill, UHF radios will be used to notify personnel. At all times during operations like CCA emergencies, whether a contained or emergency spill, personal protective equipment and clothing must be worn. Regulated requirements for staff include:

- Impervious Gloves;
- Disposable overalls (preferably waterproof) or impervious apron;
- Respirator mask;
- Safety footwear gum boots (not leather);
- Chemical goggles or eye protection with side shields; and
- Protective clothing.

In accordance with the *Porta Emergency Management Plan* in the event of a site evacuation, site workers must:

- Proceed to the assembly area;
- Remain in the assembly area until advised the emergency is over; and
- Not re-enter the site until advised it is safe to do so.

In the event of an emergency spill that is not contained by site personnel, personnel are not to hose down the spill outside the bunded area. The plant operator and other trained personnel shall:

1. Ensure all personal protective equipment is worn;

2. Alert Emergency Controller or a member of his/her team who shall alert relevant internal and/or external parties (as discussed in Section 3 of this plan);

3. Stop the spill at its source to prevent further spillage (if safe to do so);

4. Shut down relevant equipment;

5. Contain spillage with sand, earth or vermiculite;

6. Clear area of personnel and move up-wind if practicable (set up witches' hats or bunting around area);

7. Prevent spillage from entering drains or dams;

8. Contact Waste Disposal Provider to collect any recoverable chemical;

9. Neutralise/decontaminate chemical residues using lime;

10. Collect soil residues and place into approved labelled drums;

11. After clean-up operations, ensure to decontaminate and launder all protective clothing and equipment before re-using;

12. Investigate the cause of incident to prevent from re-occurring;

13. Engineering/Compliance Manager to inform EPA and other relevant authorities of the incident and corrective action (as discussed in Section 3 of this plan);

14. Contact immediate neighbours (as discussed in Section 3 of this plan); and

15. Monitor any environmental effects.

In the event of the dam on Delegate Road looking like it might reach maximum capacity, Porta will ensure the dam does not overflow onto neighbouring rivers or banks by adjusting the water level. In case of an emergency, sandbags may also be used to control the overflow of water.

12 COORDINATING WITH PERSONS

During an emergency situation, it may be necessary to communicate the state or type of emergency, the possible cause, its effects/consequences, likely duration and impact to potential stakeholders. These early warning and updates will ensure the stakeholders have the information needed to minimise any risk of harm from the incident.

All information that is communicated to external stakeholders must be authorised by responsible: Victor Bendevski (Primary Contact as listed within Table 2). Decisions to notify neighbours and the local community will be made in consultation with regulatory authorities. The only immediate neighbour is Straw services which is a commercial sawdust supplier.

In order to ensure personnel are suitably equipped to implement this plan, the following measures are implemented:

- Several members of staff are current members of the Rural Fire Service (RFS) and Retained Fire Fighters and have obtained various certificates of attainment through the RFS pertinent to fire suppression methods;
- All site fire wardens have undergone training as wardens as well as training on the use of fire extinguishers;
- Local combat agencies and emergency response organisations have all indicated interest to be involved in annual training exercises on site which will ensure combat agencies and emergency response organisations remain familiar with site conditions as well as assets; and
- Practical exercises will be arranged by the Work Health Safety Officer on site.

13 TESTING AND UPDATING OF THE PIRMP

The PIRMP is tested every 12 months (and within one month of any pollution incident that causes or threatens material harm to the environment.

A mock spill clean-up was completed at the Dry Mill (on 11 May 2026.

The results of all testing of the PIRMP is recorded and kept on site. The following table, Table 7, provides details regarding the testing of the PIRMP.

Table 7: PIRMP Testing Details

Date Tested	Tested by	Details of test	Date scheduled for next test	Issues identified
11 May 2026	Ethan Harpley (Stress Grader operator) Will Fleming (Work, Health, Safety and Environment Officer)	Mock Spill of Stress Grader Ink at the Dry Mill	15 April 2027	None

The following table, Table 8, provides details regarding updating of the PIRMP.

Table 8: PIRMP Updating Details

Reason for update **(e.g. address issues identified in testing, contact details/personnel have changed)**	**Details of updates** **(nature of changes to PIRMP)**	**Date of completion**	**Date the updated version uploaded to website**
Update of personnel/contact details and minor edits	Included details for new site personnel	25 May 2026	29 May 2026