

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



**71 CUT HILL ROAD
COBBITY
“KENMERE”**

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
Document Owner:	Compliance Officer – Safety, Environment. Karen Sutton			Start Date:	17.01.23
Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page i of 25

TABLE OF CONTENTS

INTRODUCTION.....	1
1.1 BACKGROUND.....	1
1.2 LEGISLATIVE REQUIREMENTS.....	1
1.3 LICENCED PREMISE.....	1
1.4 KEY DEFINITIONS.....	2
1.4.1 POLLUTION INCIDENT.....	2
1.4.2 MATERIAL HARM.....	2
1.4.3 IMMEDIATELY.....	2
1.4.4 RELEVANT AUTHORITIES.....	2
PIRMP REQUIREMENTS.....	3
2.1 NOTE.....	3
2.2 PLAN FORM.....	3
2.3 CONTENT AND SCOPE.....	3
2.4 PLAN AVAILABILITY.....	4
2.5 PLAN TESTING.....	4
2.6 RELATIONSHIP TO EMERGENCY RESPONSE PLAN.....	5
HAZARDS.....	6
3.1 REQUIREMENT.....	6
3.2 ACTIVITIES.....	6
3.3 ENVIRONMENT.....	6
3.4 HAZARDS.....	7
3.5 LIKELIHOOD.....	7
PRE-EMPTIVE ACTIONS.....	8
4.1 REQUIREMENT.....	8
4.2 DESIGN SAFEGUARDS.....	8
4.3 ENVIRONMENTAL MONITORING.....	8
4.4 DUE DILIGENCE.....	9
4.5 RESTRICTED ACCESS.....	9
POLLUTANT INVENTORY.....	10
5.1 REQUIREMENT.....	10
5.2 POLLUTANTS.....	10
SAFETY EQUIPMENT.....	11
6.1 REQUIREMENT.....	11
6.2 SAFETY DATA SHEETS.....	11
6.3 EQUIPMENT.....	11
CONTACT DETAILS.....	12
7.1 REQUIREMENT.....	12
7.2 LICENSEE CONTACT.....	12
7.3 RELEVANT AUTHORITY.....	12
NEIGHBOUR COMMUNICATION.....	14
8.1 REQUIREMENT.....	14
8.2 COMMUNICATION.....	14

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
Document Owner:	Compliance Officer – Safety, Environment. Karen Sutton			Start Date:	17.01.23
Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page ii of 25

RISK OF HARM TO PERSONS..... 15

 9.1 REQUIREMENT 15

 9.2 EMERGENCY RESPONSE..... 15

MAPS 16

 10.1 REQUIREMENT 16

 10.2 MAPS 16

ACTIONS TO BE TAKEN 17

 11.1 REQUIREMENT 17

 11.2 INTERNAL REPORTING..... 17

 11.3 CONTAINMENT..... 17

 11.4 EXTERNAL NOTIFICATION 17

 11.4.1 RELEVANT AUTHORITY..... 17

 11.4.2 COMMUNITY 18

 11.5 INFORMATION TO BE NOTIFIED 18

 11.6 FOLLOWING DIRECTIONS 18

STAFF TRAINING 19

 12.1 REQUIREMENT 19

 12.2 TRAINING OBJECTIVES 19

 12.3 INDUCTION PROGRAM 19

 12.4 INCIDENT DE-BRIEFING..... 19

 12.5 ACTIVITY SPECIFIC 19

 12.6 SIMULATION 19

TESTING..... 20

 13.1 REQUIREMENT 20

 13.2 SIMULATIONS/DRILLS 20

 13.3 POST INCIDENT 20

 13.4 RECORDS 20

REVIEW AND UPDATES 21

 14.1 CONTINUAL IMPROVEMENT 21

 14.2 DOCUMENT CONTROL..... 21

 14.3 DOCUMENT ISSUE 21

TABLES

Table 2.1 – Requisite Scope and Content 3

Table 3.1 – Likelihood of Hazards..... 7

Table 4.1 – Sustainability Triggers..... **Error! Bookmark not defined.**

Table 5.1 – Chemicals stored on-site..... 10

Table 7.1 – Relevant Authority Contact Numbers..... 13

Table 10.1 – PIRMP Maps 16

APPENDICES

APPENDIX A

Maps

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
Document Owner:	Compliance Officer – Safety, Environment. Karen Sutton			Start Date:	17.01.23
Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page iii of 25

Introduction

1.1 BACKGROUND

The *Protection of the Environment Operations Act 1997* (POEO Act) specifies requirements to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

The objectives of a PRIMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

1.2 LEGISLATIVE REQUIREMENTS

The specific requirements for this PIRMP are set out in Part 5.7A of the POEO Act and the *Protection of the Environment Operations (General) Regulation 2009* (POEOG Regulation). In summary, these provisions require the following:

- All holders of an Environment Protection Licence (EPL) must prepare a PRIMP.
- The PIRMP must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEOG Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the EPL relates.
- Licensees must test the plan in accordance with the POEOG 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).

There are offences for individuals and licensees for not preparing a PIRMP, not keeping the PIRMP at the premises to which it relates, not testing the PIRMP in accordance with the Regulations and not implementing the PIRMP in the case of an incident.

1.3 LICENCED PREMISE

Leppington Pastoral Co Pty Ltd is the licensee of EPL 2767 that authorises extractive activities at Cut Hill Road, Cobbitty NSW 2570.

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 1 of 25

1.4 KEY DEFINITIONS

1.4.1 POLLUTION INCIDENT

The definition of a pollution incident is:

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.

1.4.2 MATERIAL HARM

A pollution incident is required to be notified if there is a risk of ‘*material harm to the environment*’, which is defined in 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.*

1.4.3 IMMEDIATELY

The POEO Act requires the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to **immediately** notify the relevant authority when material harm to the environment is caused or threatened.

Immediately has its ordinary dictionary meaning of promptly and without delay.

The objective is to ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

1.4.4 RELEVANT AUTHORITIES

Relevant authorities include:

- Environment Protection Authority
- Camden Council
- Ministry of Health
- Safework NSW
- Camden West Rural Fire Brigade
- NSW Fire and Rescue
- NSW Police
- NSW Ambulance

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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This document cannot be modified without approval of the Director Operations					Page 2 of 25

PIRMP Requirements

2.1 NOTE

In the following, use of the term 'section' refers to provisions in the POEO Act and 'clause' to provisions of the POEOG Regulation.

2.2 PLAN FORM

Pursuant to section 153D and clause 98B(1), as the purpose of the PIRMP is to improve the management of pollution incidents and facilitate better coordination with the relevant response agencies, the PRIMP must be:

- able to be provided in written form;
- be available at the premises; and
- able to be provided to an authorised EPA officer on request.

While the PIRMP can be prepared and stored in other forms, a written copy of this PIRMP must be available to an authorised EPA officer and to any person who is responsible for implementing the plan.

2.3 CONTENT AND SCOPE

The required content and scope of this PIRMP, including the statutory basis, is summarised in the table below.

Table 2.1 – Requisite Scope and Content

Scope	Content	Statutory Basis
Hazards	A description of the main hazards to human health or the environment associated with the activity being undertaken at the premises, the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood.	cl 98C (1)(a)(b)
Pre-emptive Actions	Detailed descriptions of the 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.	cl 98C(1)(c)
Pollutant Inventory	An inventory of potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises. Details of the pollutant storage locations, including underground storage tanks and storage methods, must also be included.	cl 98C(1)(d)(e)
Safety Equipment	A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident. Specific details must be provided in relation to any site or activity-specific safety equipment and must include the location where this equipment is stored and the material safety data information for any chemicals or fuels used or stored at the premises.	cl 98C(1)(f)
Contact Details	The names, position titles and 24-hour contact details of those key individuals who are responsible for activating the PIRMP and managing the response; those authorised to notify relevant authorities, and those responsible for managing the response to a pollution incident. The contact details of the relevant authorities for notification.	cl 98C(1)(g)(h)

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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Approved by:	Director Operations- Wayne Perich	Next Review Date:			17.01.24
This document cannot be modified without approval of the Director Operations					Page 3 of 25

Table 2.1 – Requisite Scope and Content

Scope	Content	Statutory Basis
Neighbour Communication	Details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of lands who may be affected by an incident occurring on the premises; including any specific information that could be provided to the community so it can minimise the risk of harm.	cl 98C(1)(i)
Minimising Harm	Actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises should an incident occur.	cl 98C(1)(j)
Maps	A detailed map (or set of maps) showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, discharge locations to the nearest watercourse or water body.	cl 98C(1)(k)
Actions to be Taken	Detailed descriptions of the actions that will be taken by the licensee immediately after a pollution incident to reduce or control any pollution. These should include, as a minimum, early warnings, updates and actions to be taken during and after an incident.	cl 98C(1)(l)
Staff Training	Detail on the nature and objectives of any staff training program on implementing the PIRMP. Details of the training program must include the frequency of training and how the records of any training are kept.	cl 98C(1)(m)

2.4 PLAN AVAILABILITY

Pursuant to clause 98D this PIRMP must be maintained at the premises to which the EPL relates so that it is readily available to those responsible for its implementation and to an authorised officer on request.

Some sections of the plans must be made publicly available within 14 days after they have been prepared by:

- placing them in a prominent position on a publicly accessible website of the licensee;
- providing copies of them, without charge, to any person who makes a written request for a copy if the licensee does not have a website.

The information to be made available to the public:

- must include the procedures for contacting the relevant authorities; and
- must include the procedures for communicating with the community; but
- may be exclusive of any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998*.

2.5 PLAN TESTING

Pursuant to clauses 98C(1)(n),(o) and (p), 98C(2)(f) and (g), 98E(1) and 98E(2) this PIRMP must be tested routinely at least once every 12 months. The 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 capable of being implemented in a workable and effective manner.

The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including the effectiveness of training.

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This document cannot be modified without approval of the Director Operations					Page 4 of 25

A PIRMP must include details such as:

- the manner in which they are to be tested and maintained;
- the dates on which they have been tested and the name of the staff members who carried out the testing; and
- the dates on they are updated.

A PIRMP must also be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates to assess, in the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

2.6 RELATIONSHIP TO EMERGENCY RESPONSE PLAN

Pursuant to clause 98B(2) a PIRMP may form part of another existing plan (eg. emergency response plan -ERP) as long as the information required to be included in the PIRMP is readily identified in the ERP and meets the requirements of section 153C of the POEO Act and the POEOG Regulation.

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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This document cannot be modified without approval of the Director Operations					Page 5 of 25

Hazards

3.1 REQUIREMENT

This section of the PIRMP provides:

- a description of the main hazards to human health or the environment associated with the activity being undertaken at the premises;
- the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood.

3.2 ACTIVITIES

The site is used for extractive activities, namely topsoil removal, with a 30,000-50,000 tonne annual capacity. The previous methods of operation related to a former owner of the land and are not known.

3.3 ENVIRONMENT

The premise is bounded by the Nepean River to the west and by land zoned RU1 - Primary Production to the north, south and east. The property is located approximately 6.5 kilometres west of Oran Park. The dominant surrounding land uses are primary production, including horticulture and animal husbandry.

The premise is a rural environment and is located near a densely populated area. There are 14 residences within 500 m of the premise boundary.

The Nepean River is located adjacent to the site, however, the site is not mapped as being impacted by flooding. There is no infrastructure located on the site.

Access to the site is off Cut Hill Road. A sealed road leads to the front gate of the site. The sealed road is used to access multiple landholdings.

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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 6 of 25

3.4 HAZARDS

The main potential hazards to human health or the environment associated with the activities undertaken at the premises include:

- sedimentation runoff,
- fire;
- acts of vandalism or target of terrorist activity;
- excessive dust
- flooding of the Nepean River; and
- soil and stockpile instability.

3.5 LIKELIHOOD

The likelihood of any the above hazards occurring is increased if activities are not undertaken in the correct manner.

Table 3.1 – Likelihood of Hazards

Hazard	Likelihood	Impact
Sedimentation runoff	Medium	Medium
Bushfire	Medium	High
Acts of vandalism or target of terrorist activity	Low	Medium
Excessive dust	Low	Medium
Flooding of the Nepean River	Low	High
Soil and stockpile instability	Low	Low

As it relates to reducing the risk of a pollution incident occurring, the adoption of the pre-emptive arrangements and actions identified in **Section 4** provide the best practicable means of minimising risk. Notwithstanding, equipment and machinery does fail, people make mistakes and climatic extremes do occur.

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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This document cannot be modified without approval of the Director Operations					Page 7 of 25

Pre-Emptive Actions

4.1 REQUIREMENT

This section of the PIRMP provides descriptions of the pre-emptive arrangements in place and the actions taken to minimise or prevent any risk of harm to human health or the environment.

4.2 DESIGN SAFEGUARDS

Vegetation has been reinstated along the western bank of the Nepean River. The reinstated vegetation acts to improve soil stability along the western bank of the Nepean River while also acting to minimise the potential for stormwater run-off. Established vegetation also minimises the risk of sedimentation entering the river system and dust generation.

4.3 ENVIRONMENTAL MONITORING

Monitoring of the site after significant rainfall events to determine if potential sedimentation has occurred.

Surface water is monitored in the Nepean River upstream and downstream of the site. A grab sample is obtained from these locations after significant rainfall event of greater than 15 mm in 24 hours.

Environmental monitoring assists with site management and identifies if changes to site controls or management actions are required.

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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 8 of 25

4.4 DUE DILIGENCE

Staff and contractors are provided due diligence training specific to the tasks they undertake on the premises. This training focusses on:

- Immediate reporting obligations to their site manager in the event of any incident with the potential to cause environmental impact, including notification of any spill of chemical or other event;
- Regular inspections of the site system to check no sedimentation events or trespassing and/or vandalism;
- Appropriate maintenance of plant and equipment in good working order; and
- The location of spill containment equipment held at the premises.

4.5 RESTRICTED ACCESS

The site is fully fenced with stock fence which limits unauthorised access outside operational hours and a gate at the entrance restricts access by uninvited third parties. All staff are required to be vigilant and aware that the site is a potential target for vandalism.

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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This document cannot be modified without approval of the Director Operations					Page 9 of 25

Pollutant Inventory

5.1 REQUIREMENT

This section of the PIRMP includes an inventory of potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity stored.

5.2 POLLUTANTS

Pollutants can include, but are not limited to, chemicals used in cleaning and maintenance processes as well as fuels and lubricants used for equipment or machinery.

There is not suitable storage area located onsite allocated to the storage of chemicals. As such, there are no chemicals proposed to be stored onsite.

Table 5.1 – Chemicals stored on-site

Chemical/product	Dangerous Good?	Maximum Quantity Stored
Diesel	Yes. Hazchem Code 3Z	7000 – 10000 Lt

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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 10 of 25

Safety Equipment

6.1 REQUIREMENT

This section of the PIRMP includes a description of the safety equipment and other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident. It provides detail on the location of where this equipment is stored –. See blow

6.2 SAFETY DATA SHEETS

Safety Data Sheets (SDS) for chemicals used and stored at the site are kept in the *Chemical and SDS Register*. A hardcopy of SDS will also be kept on site in the demountable / Common Room

6.3 EQUIPMENT

The site maintains the following safety equipment

Health and safety equipment stored in the demountable/ Common room:

- Face Mask
- Safety Glasses
- Hearing Protection
- First aid kit
- Fire extinguishers

Pollution Incident control equipment:

- Spill kit (minor spills)
- Earth moving plant and machinery (major spills)

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This document cannot be modified without approval of the Director Operations					Page 11 of 25

Contact Details

7.1 REQUIREMENT

The PIRMP is required to include the names, position titles and 24-hour contact details of those key individuals who are responsible for activating the PIRMP and managing the response; those authorised to notify relevant authorities and those responsible for managing the response to a pollution incident. The PIRMP must also provide the contact details of the relevant authorities.

7.2 LICENSEE CONTACT

The ?role/position? responsible for:

- activating the PIRMP;
- managing the response;
- authorised to notify relevant authorities; and
- responsible for managing the response to a pollution incident.

Wayne Perich
Director
0418 977 917

Karen Sutton
Compliance Safety & Environment
0438 353 993

The 24 hour contact number is 0418 977 917

7.3 RELEVANT AUTHORITY

Pursuant to section 148 of the POEO Act relevant authority means any of the following:

- (a) *the appropriate regulatory authority,*
- (b) *if the EPA is not the appropriate regulatory authority—the EPA,*
- (c) *if the EPA is the appropriate regulatory authority—the local authority for the area in which the pollution incident occurs,*
- (d) *the Ministry of Health,*
- (e) *SafeWork NSW,*
- (f) *Fire and Rescue NSW.*

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This document cannot be modified without approval of the Director Operations					Page 12 of 25

As it relates to activities associated with the operation of the site, the following clarifications are provided:

- If an incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the 'first responders', as they are responsible for controlling and containing incidents.
- As a scheduled premise operating under an EPL, the appropriate regulatory authority is the EPA.
- The premise is located within the Camden Council local government area and is the appropriate council authority.
- Whilst not included in cl 48, the NSW Rural Fire Service is also considered a relevant authority for the purposes of this PIRMP.

The contact details for these authorities is provided in **Table 7.1**.

Table 7.1 – Relevant Authority Contact Numbers

Authority	Contact Number
Emergency Call Services Fire and Rescue NSW, NSW Police NSW Ambulance Service	000
Environment Protection Authority Illawarra Regional Office Emergency Hotline Number (24 hours)	02 4224 4100 131 555
Camden Council	02 4654 7777
SafeWork NSW	131 050
Macarthur Rural Fire Service Camden West Rural Fire Brigade	02 9608 7777 02 9607 7777
Camden Fire Station	02 4658 1688
NSW Ministry of Health Public Health Unit Public Health Officer on Call (24 hours)	02 6339 5601 0428 400 526

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This document cannot be modified without approval of the Director Operations					Page 13 of 25

Neighbour Communication

8.1 REQUIREMENT

Communicating with potentially affected neighbours is an important element in managing the response to any incident. A PIRMP must include details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of lands who may be affected by an incident occurring on the premises.

The site is located in a rural environment and is located near a densely populated area. There are 14 residences within 500 m of the premise boundary.

8.2 COMMUNICATION

In the event of an incident for which there is a potential for impact to neighbours, Compliance Officer (or their nominee) will telephone call or 'door knock' all potentially impacted neighbours.

Details will be provided to these neighbours on the nature of the pollution incident, its cause and what containment/rectification action has been undertaken. If and as required by the neighbour, updates will then be provided.

In determining the extent of neighbour notification, the Compliance Officer (or their nominee) will consider aspects such as the area of the site the incident occurred.

Where the pollution incident causes or threatens material harm to the environment or human health and the EPA has been notified, the Compliance Officer will notify any other landowners (beyond the neighbours already contacted) as so may be instructed by the EPA.

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 14 of 25

Risk of Harm to Persons

9.1 REQUIREMENT

A PIRMP must include any actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises should an incident occur.

As detailed in **Section 2.6** this PIRMP is a stand-alone plan and separate to the site's Emergency Response Plan (ERP).

Any pollution incident that presents potential harm to the health or safety of human beings will result in immediately triggering implementation of the ERP. A copy of the ERP can be found On Site, in the demountable / Common Room

9.2 EMERGENCY RESPONSE

Potential harm to the health or safety of human beings at the premises will trigger the activation of evacuation procedures.

All staff and visitors will be contacted by radio and/or mobile and mustered to the Emergency Assembly Points, after which they will be safely evacuated from site where appropriate.

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Approved by:	Director Operations- Wayne Perich			Next Review Date:	17.01.24
This document cannot be modified without approval of the Director Operations					Page 15 of 25

Maps

10.1 REQUIREMENT

A PIRMP must include a set of maps showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the nearest receiving waters.

10.2 MAPS

Appendix A to this PIRMP provides maps identifying the above.

Table 10.1 – PIRMP Maps

Map	Comment
EV01	Locality of the site
EV02	Site Plan – access from road network and infrastructure.
EV03	Environs -including all neighbouring residences within 500 m of premise boundary; receiving waters Nepean; EPL monitoring points.
EV04	Emergency Assembly Points Site Plan

Document Ref:	Pollution Incident Response Management Plan	Revision:	2.0	Approval Date:	17.01.23
Document Owner:	Compliance Officer – Safety, Environment. Karen Sutton	Start Date:			17.01.23
Approved by:	Director Operations- Wayne Perich	Next Review Date:			17.01.24
This document cannot be modified without approval of the Director Operations					Page 16 of 25

Actions to be Taken

11.1 REQUIREMENT

A PIRMP must include detailed descriptions of the actions that will be taken by the licensee immediately after a pollution incident to reduce or control any pollution.

11.2 INTERNAL REPORTING

In the event of any pollution incident occurring, all staff and contractors have an obligation to immediately report the incident to the Compliance Officer- Safety, Environment

11.3 CONTAINMENT

All site personnel with relevant training must make every effort to contain any pollution incident on site, without putting themselves at risk of harm.

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately.

In the event of a chemical spill that is not contained by bunding, the chemical spill kits or other method must be used to restrict the spread of the chemical. Earthworks should be used to contain and isolate any spill to prevent discharge off-site.

Staff must follow the instructions of the Compliance Officer – Safety & Environment, who will assess how any clean up from an incident will be undertaken, including the procedures to be followed such as the engagement of contractors and use of clean-up equipment.

11.4 EXTERNAL NOTIFICATION

11.4.1 RELEVANT AUTHORITY

The Director of Operations and/or the Head of Safety, Quality and Logistics will make a determination of the potential for the incident to cause material harm and immediately notify the relevant authorities: noting that immediately means promptly and without delay.

If the incident presents an immediate threat to human health or property the first action is to call 000. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, the following notifications will be made:

- EPA;
- Council;
- Rural Fire Service;
- Ministry of Health
- SafeWork NSW

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This document cannot be modified without approval of the Director Operations					Page 17 of 25

- Fire and Rescue NSW (Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again).
- Department of Primary Industries (in the event of mass herd death).

11.4.2 COMMUNITY

Contingent on the nature of the incident and the potential for it to result in an off-site impact, the Safety & Environment Officer will make a determination on neighbours to be notified, consistent with the protocol specified in **Section 8**.

11.5 INFORMATION TO BE NOTIFIED

Under section 150 of the *POEO Act 1997* the information about a pollution incident that must be notified is:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- 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;
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Other information prescribed by the regulations.

The *Incident Notification/Investigation Report (MF-FORM-8.03-01)* must be completed. A copy of this form is provided in **Appendix B** to check.

11.6 FOLLOWING DIRECTIONS

Staff and contractors must act on any instruction issued by the EPA.

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This document cannot be modified without approval of the Director Operations					Page 18 of 25

Staff Training

12.1 REQUIREMENT

A PIRMP must include details on the nature and objectives of any staff training program on implementing the plan.

12.2 TRAINING OBJECTIVES

The training objective relating to the PIRMP is to ensure that all staff and contractors understand and have knowledge of:

- where copies of the PIRMP are located;
- the content, scope and function of the PIRMP;
- the requirement to immediately notify management of any pollution incident;
- where safety and spill containment equipment is located and how it is to be utilised; and
- where emergency assembly points are located.

12.3 INDUCTION PROGRAM

New members of staff and contractors working at the site will be provided induction training that includes clarification of their obligations relating to the requirements of this PIRMP.

Records that induction training has been provided, inclusive of PIRMP requirements, will be maintained by Compliance Officer – Safety & Environment

12.4 INCIDENT DE-BRIEFING

In the event of a pollution incident occurring, an incident debriefing will be conducted with relevant staff/contractors to review the effectiveness of the PIRMP and the extent to which procedures in this PIRMP were followed.

12.5 ACTIVITY SPECIFIC

Regular site briefings and toolbox meetings will be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to pre-emptive actions.

12.6 SIMULATION

At least once a year the Compliance Officer – Safety & Environment will undertake a simulated pollution incident response exercise.

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This document cannot be modified without approval of the Director Operations					Page 19 of 25

Testing

13.1 REQUIREMENT

A PIRMP must be tested routinely at least once every 12 months. The 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 capable of being implemented in a workable and effective manner.

13.2 SIMULATIONS/DRILLS

The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the PIRMP, including the effectiveness of training.

13.3 POST INCIDENT

A PIRMP must also be tested within one month of any pollution incident occurring to assess, in the light of that incident, whether the information included in this PIRMP is accurate and up to date, and that the PIRMP is still capable of being implemented in a workable and effective manner.

13.4 RECORDS

Records will be maintained by the Compliance Officer – Safety & Environment that document the manner in which the PIRMP has been tested and the dates on which the PIRMP was tested.

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This document cannot be modified without approval of the Director Operations					Page 20 of 25

Review and Updates

14.1 CONTINUAL IMPROVEMENT

The PIRMP is a living document that will be reviewed and (if required) updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

Where such a review establishes the need/opportunity to improve the PIRMP, the Compliance Officer – Safety & Environment will update the PIRMP accordingly.

14.2 DOCUMENT CONTROL

Document control is an important part of the site's third party accredited Environmental Management System.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version will be replaced in its entirety.

14.3 DOCUMENT ISSUE

The Compliance Officer – Safety & Environment will be responsible for ensuring all third parties are provided with the latest current version of this PIRMP.

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This document cannot be modified without approval of the Director Operations					Page 21 of 25

Appendix A

MAPS