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Pollution Incident Response Management Plan

ENFIELD ASPHALT

Version five: 7 December 2024

DOCUMENT CONTROL SHEET

Rev.	Date	Prepared by	Approved By	Revision Details
01	15 Dec 2020			Document created
02	10 Dec 2021			Document updated for staff changes
03	10 Dec 2022			Document updated for staff changes/ review following EPP update and site review
04	07 Dec 2023			Document updated for staff changes
05	07 Dec 2024			Document updated for staff changes

Table 1: Document update details

Current Rev.	Date Implemented	PIRMP Test Schedule	Date for Next Review
5	7 th December 2024	12 months	15 th December 2025

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PART A: COMPLIANCE REQUIREMENTS, POLLUTION INVENTORIES AND RISK ASSESSMENTS

EXTERNAL

1. PURPOSE

The purpose of the Enfield Asphalt Pollution Incident Response Plan is to:

- Provide direction to the staff at Enfield Asphalt in responding to pollution incidents at the Enfield operations;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Blacktown Council, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident at Enfield Asphalt by identifying key risks and planned actions to minimise and manage those risks;
- Detail the training requirements for this plan, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.
- A hard copy of the PIRMP is to be kept on the site environmental board in the Enfield Asphalt Main Office. A soft copy of the PIRMP and EPL 21429 is made available online <https://www.boral.com.au/our-commitment/environmental-reporting>.

2. LEGISLATIVE REQUIREMENTS

The specific requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation). Part 3A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation) describes specific components and requirements of a PIRMP.

Table 2 summarises the location of these requirements within the document.

Table 2: Summary of Legislative Requirements of a PIRMP

Section/Clause	Requirement	Location in PIRMP
Part 5.7A POEO Act 1997		
147	(1) For the purposes of this Part— (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. (2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.	Section 3
153A	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.	EPL 21429 and this document
153C	A pollution incident response management plan must be in the form required by the regulations and must include the following— (a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to— (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and (iii) any persons or authorities required to be notified by Part	Section 7 and 8 Section 4 Section 6, 7, 8, 9 and 14 Section 6, 7, 8, 9 and

	5.7, (b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution, (c) the procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made, (d) any other matter required by the regulations.	14 Section 13 Section 6, 7, 8, 9 and 14 Section 8, 13
153D	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	Section 1
153E	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations	Section 10,11
153F	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part	Section 3, Section 13
Part 3A POEO(G) Regulation 2009 Pollution Incident Response Management Plans note: See also 153C (a)-(c) of the POEO Act 1997		
98C(1) (a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates,	Section 5, Appendix 1
98C(1) (b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Appendix 1
98C(1) (c)	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity	Section 8, Appendix 1, Section 13
98C(1) (d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity	Section 5
98C(1) (f)	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,	Section 5, Appendix 1
98C(1) (g)	the names, positions and 24-hour contact details of those key individuals who: I. are responsible for activating the plan, and II. are authorised to notify relevant authorities under section 148 of the Act, and III. are responsible for managing the response to a pollution incident,	Section 7, 14
98C(1) (h)	the contact details of each relevant authority referred to in section 148 of the Act,	Section 8, 14
98C(1) (i)	Details of the mechanisms for providing early warnings and	Section 9

	regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on	
98C(1) (j)	The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Section 8, Appendix 1
98C(1) (k)	A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises	Figure 1-3
98C(1) (l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,	Section 8, Appendix 1
98C(1) (m)	The nature and objectives of any staff training program in relation to the plan	Section 10
98C(1) (n)	The dates on which the plan has been tested and the name of the person who carried out the test,	Table 6
98C(1) (o)	The dates on which the plan is updated,	Document Control Sheet
98C(1) (p)	The manner in which the plan is to be tested and maintained.	Section 10, 11, 12

3. DEFINITION OF ‘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.”

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

a) Harm to the environment is material if:

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

ii. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Enfield Asphalt is now required to report **non-trivial** pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

4. SCOPE

This PIRMP must be followed by employees, contractors and visitors of Enfield Asphalt, to assist in the early response to and reporting of a pollution incident. Enfield asphalt is owned and occupied by Boral Resources (NSW) and is operated under Environmental Protection Licence 21429.

5. SITE LAYOUT

Figure 1: Enfield Asphalt Location Map



Figure 2: Enfield Asphalt Reference Map



6. POTENTIAL POLLUTING SUBSTANCES

Table 3 below is an inventory of potential pollutants kept on the premises. This inventory provides a description of the main hazards to human health or the environment, an assessment of the likelihood of the hazards occurring and also includes the current controls and safety equipment and/ or pre-emptive actions in place to minimise or prevent risk of harm to human health or the environment.

EXTERNAL

Table 3: Potential Pollutants

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment)							
Site Name: Enfield Asphalt					Responsible Person: Site Manager/Supervisor		Date: 07/12/2024
Name / description	Covered under Haz Chemicals/SDS?	Amount stored	Location of storage	Map reference	Need for early warning ¹	Current controls	See Risk Ass & PIRMP Response Action (see Below)
CHEMICALS/FUELS/LUBRICANTS (raw materials and products which can cause pollution)							
Bitumen Emulsion	Non DG	41,000 ltrs	Emulsion tank (emulsion is 60% bitumen, 38% water, 2% emulsifier)	Ref No #2	N/A	• Bunding • PMP • Training • Spill Kits • SOP • Inductions • Fire Fighting Equipment • Security • Digital level indicator • Discharge permit in use for fill process • CCTV covers area	Incident #1
Oils/Solvents	Class 3	Packaged goods up to 5000 ltrs	Oil Storage Shed at Workshop	Ref No #5	N/A	• Bunding • PMP • Training • Flammable Cabinet • Spill Kits • Inductions • Fire Fighting Equipment	Incident #2
		Packaged goods up to 26000 ltrs	Chemical Storage at production warehouse	Ref No #1			

¹ Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

		Waste Oil Tank 1,000 ltrs	Oil/water separator	Ref No #5		• Security • Individual package sizes no greater than 1000 ltrs • Annual servicing of interceptors	
Gases (LPG)	Class 2	Variable	Maintenance Workshop – Storeroom and Locked cage	Ref No #4 and #5	N/A	• Fire Extinguishers • Concrete Floor • Enclosed Shed/Locked cage • Stored in open air • Containment Cages and Cabinets	Incident #2
Automotive Diesel	Non DG	1000 ltrs	Diesel Tank	Ref No #3	N/A	• Self bunded double skin tank • Measuring indicator on tank • Fire Fighting Equipment • Locked key controlled tank • Spill Kits • Inductions • Pump controls inside lockable compartment • Power lead disconnected when not in use.	
MATERIALS (eg stockpiles, silos, bulk solids etc)							

Aggregate Stockpiles	N/A	Variable	Dedicated on site	Ref No #6 & #7	N/A	• 2 x Hose reel with connectable suppression head • Nighttime crushing only • Street sweeper – 2 visits / week • Bobcat with broom attachment • Maintain manageable levels • Security • Fixed dust suppression	Incident #3
Processed product	N/A	Variable	Dedicated on site	Ref No #9 & 10	N/A	• Hose reel with connectable suppression head • Street sweeper– 2 visits / week • Bobcat with broom attachment • Maintain manageable levels • Product is bituminous so does not produce dust	
AQUEOUS (eg dams, wastewater tanks, other water storage area)							
Storm Water Drains	N/A	Variable	Site	N/A	N/A	• Straw Bales • Rubber and Earthen Berms • Audits and Inspections • Stormceptor with coalescer x 2 • 6 monthly schedule	Incident #2

						for clean out of Stormceptor	
SUBSTANCES IN PROCESSES (substances which could be emitted from operational process i.e. treatment plants, vehicles etc)							
Name / description	Covered under Haz Chemicals/MSDS?	Amount stored	Location of storage	Map reference	Need for early warning²	Current controls	See Risk Ass & PIRMP Response Action (see Below)
Mobile Plant (BORAL)	Class 3	Up to 10 MP on site	Variable Locations	N/A	N/A	• Spill Kits • Prestart checks • PMP • Training	Incident #2
Mobile Plant (Contractor/ visitor)	Class 3	Variable	Variable Locations	N/A	N/A	• Spill Kits • Training • Inductions	Incident #2
Car Parking up to 30 vehicles	Class 3	Variable	Road crew and staff car parks	Ref No #8 & #9	N/A	• Spill Kits • Training	Incident #2
Traffic Areas (dust, chem. leaks & loss)	Class 3	N/A	Dedicated on site	N/A	N/A	• Training • Fixed dust suppression • Spill Kits • Skid Steer with broom attachment • 3 x fixed hose reel with attachable suppression head • Twice weekly street sweeper	Incident #2

² Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

7. ROLES AND RESPONSIBILITIES

Position	Responsibility
<i>Employees and Contractors</i>	Following the procedures outlined in the PIRMP and related documents Immediately alerting Supervisor or Team Leader of any environmental incidents or near-misses.
<i>Team Leaders / Front Line Supervisors</i>	Following the procedures outlined in the PIRMP and related documents (HSEQ MS 3-02) Immediately alerting Site/Operations Manager or, in case of their unavailability, Environmental Representative or Environment Manager of any potentially material environmental incidents or near-misses. Assist in conducting incident investigations.
<i>Site Manager and/or Site Environmental Advisor and/or Environment Manager</i>	Authorisation of the PIRMP Administration, maintenance and implementation of the PIRMP Assessing whether the incident is non-trivial and has caused or threatens “material environmental harm” and communicate details to management. Provide direction and advice on incident response Coordinate communication to neighbours through Stakeholder Relations Manager Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact.
<i>HSE Regional Manager and/or Regional Environment Manager</i>	Make a determination as to whether the incident (as defined in section 147 of the POEO Act) is non-trivial and therefore reportable to external agencies Inform Executive General manager and Group management of Notification to External Agencies Undertake notifications as defined in PIRMP Authorise notifications to public and/or media following GRP-HSEQ-2-02

8. INTERNAL POLLUTION INCIDENT REPORTING

Any pollution incident satisfying the **material harm** threshold must be immediately reported to relevant statutory authorities by either the Site/Operations Manager, or regional Environment Manager.

In cases where “material harm” level cannot be immediately assessed or insufficient information comes to hand on the severity of the incident, the general advice is to err on the side of caution and notify the Relevant Authorities with a qualification that the situation could not yet be fully assessed.

Until further notice the following procedure needs to be followed:

1. When a pollution incident occurs, a person who has become aware of it must immediately bring it to the attention of his/her immediate Supervisor or Manager
2. If necessary, first ring “000” for Emergency Services
- 3 At least one of the following BCM personnel must be contacted **immediately**:

Whilst personal contact details for the following are available in the Controlled on site Pollution Incident Response Management Plan they do not appear in this public document.

Table 4: Site Contacts

Name	Function	Phone number	Mobile number
	Manufacturing Supervisor		
	Health and Safety Business Partner		
	Manufacturing Operations Manager		
	Senior Environmental Business Partner		
	Environmental Business Partner		

4. The Enfield Site Manager, or in case of his unavailability one of the Senior Management personnel listed above, is to **immediately** notify the NSW HSE Regional Manager or Environment Manager NSW/ACT.
5. NSW HSE Regional Manager to immediately notify all Appropriate Regulatory Authorities specified in Section 9.
6. In borderline situations, where the exceedance of the trigger level of “material harm” of a pollution incident may not be clear, a quick assessment including consultation with Boral environmental personnel should be undertaken to help the decision whether to notify or not.
7. Boral’s Senior Management must be informed promptly of the fact of immediate notification to the Authorities.

9. EXTERNAL POLLUTION INCIDENT REPORTING

As the legislation requires that notification must be done immediately upon becoming aware of the pollution incident, it is unlikely that a detailed picture will be available for reporting. Notwithstanding, it seems that some of the Government Authorities prepared a detailed questionnaire, which is being filled at the time of this initial notification. Under the stress of incident handling it could be easy to provide a hasty, inaccurate estimate of the situation when answering these questions.

Therefore, the notification should be restricted to the facts known and nothing should be assumed or guessed. The details will be provided to the asking Authority later when more information comes to hand.

The initial notification should include as much of the following information (if known) as possible:

- Location and time of the pollution incident
- Type of the incident (spill, fire, unlicensed harmful discharge, etc)
- Assessed level of incident gravity: “it seems to be...” (e.g. “a relatively minor spill”; “major fire”, “explosion limited to one building”, etc.)
- Whether the Emergency Services have been required to attend.

Unless known for a fact, the answers to other questions should be politely deferred until a better assessment of the situation can be made.

The Boral person who is responsible for notifying the Authorities (NSW HSE Regional Manager or Regional Environment Manager) about the incident as per the contact details in Table 5, must prepare a Notification Log (a suitable form is attached in Section 14) with the details of time of notifications and the persons who took to the call. The Authorities will generally provide an Incident Notification Number.

Notification of all Appropriate Government Authorities (at least 5 entities) may take considerable time. Delays may be experienced connecting to the right person or no contact may be possible after hours. All such instances should be recorded in the Notification Log.

10. POLLUTION INCIDENT AUTHORITY CONTACT LIST

Table 5: External Authority Contact List

Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Strathfield City Council	(24hr) (02) 9748 9999
Public Health Unit (Camperdown) – Sydney South West AHS	HealthLink (24 hr): 0 - 1800 063 635 Head Office – Camperdown: 0 - (02) 9515 9420
WorkCover Authority of NSW	13 10 50 Company ABN if asked: 51 000 187 002
Government Authority - ring if relevant	Emergency notification phone number
Roads and Maritime Services (road spills)	132 701
NSW Office of Water	8838 7885
Bush Fire Control Officer	1800 049 933
Poisons Information Centre	131 126
Endeavour Energy (power line emergencies)	131 003

Police & Ambulance	000
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Communication with the local community may also be undertaken depending on the circumstances of the pollution incident. Enfield Asphalt would consider the following options for providing Early Warning and ongoing information to the community on pollution incidents:

- Direct phone contact with any local residents directly impacted by the pollution incident
- Letter Box drops of incident information and site contacts to local residents impacted by the pollution incident

The Stakeholder Relations Manager can assist in the process of communicating with the community, as per the Stakeholder Engagement Plan for the site.

11. INCIDENT RESPONSE TRAINING

Enfield Asphalt will implement the Pollution Incident Response Management Plan by training or providing information to relevant employees and contractors in relevant areas of the Plan.

The nature and objectives of staff training is to relate to site personnel the importance of early notification of any incidents and spills to site supervisors and key personnel.

Training or information will be provided on the following;

- The contents and intent of this PIRMP,
- The roles and responsibilities of site staff in relation to this PIRMP
- Spill response procedures;
- General environmental awareness; and / or
- Hazardous materials awareness.

Site inductions for visitors and sub-contractors also advise individuals to report any environmental incidents or spills to site supervisors and key personnel immediately. Key site personnel and supervisors participate in PIRMP Tests which are used as practical training and can also be used to identify any potential gaps or areas for improvement for the PIRMP. A summary of the PIRMP Drills undertaken at Enfield Asphalt is shown below in Table 6.

Table 6: PIRMP Drills Undertaken at Enfield Asphalt

Test Date	Version tested	Incident Drilled	Drill Team Lead
10 dec 2021	01	Desktop simulation	
10 Dec 2022	02	Desktop simulation and PIRMP review	
07 November 2023	03	PIRMP drill toolbox	
13 November 2024	04	Oil leak	

A sign-off sheet is kept of the personnel present for the undertaking of a PIRMP Drill and a record is kept on when and how the PIRMP is communicated to employees. This information forms a section of the PIRMP Drill document. For more information regarding each of the PIRMP Drills, refer to the specific drill document.

12. PIRMP TESTING

Plans 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 each plan is capable of being implemented in a workable and effective manner.

The objectives of an audit are to maintain compliance with this plan. Internal audits of this Plan will be undertaken every 3 years.

Routine testing of the PIRMP will be conducted annually, and can be completed through the following methods:

- Simulated environmental emergency; or
- Desktop simulations.

13. PIRMP REVIEW

Revisions are to be coordinated by the Site Manager and Environmental Representative.

The objectives of a review are:

- To maintain compliance with the statutory requirements, and
- To identify opportunities for improvement in the Plan, and reduce the risk to human health and the environment

13.1. EVENT BASED

Events which may trigger a review of this Plan or its associated documents include:

- Within 1 month of reporting to the nominated parties in accordance with the plan, after a pollution incident, or
- Modification/Improvement to the system

13.2. TIME BASED

Enfield Asphalt will review this management plan routinely every 12 months. The Plan review will include:

- This Document, and
- Legislation, Approval and Licence changes.

APPENDIX 1. RISK ASSESSMENT ON POTENTIAL IMPACTS

Hazard and Likelihood Risk Assessment and Corrective Control Measures								
Site: Enfield Asphalt				Responsible Person: Site Manager/Supervisor			Review Date: 07 December 2024	
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Likelihood	Risk	Factors that could increase risk	Control Measures Corrective Action Coverage under other Plans	Responsible person	Action date
Emulsion (bitumen)	Incident #1 Catastrophic failure of above ground emulsion tank resulting in material harm to the environment.	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have higher fire risk.	Consequence: (Minor): Failure resulting in loss of all or substantial volume of tanks would be captured entirely by existing primary bund with no release to soil or water. Likelihood: (Unlikely): Due to location within bund, damage to tanks is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity with low risk of failure through corrosion. Residual Risk Assessment = Minor (2) Vs Rare (1) = LOW (2)	As per PIRMP action plan	When required
	Incident #1 Catastrophic failure of drain valve resulting in material harm to the environment.	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with	Consequence: (Minor): Failure of drain valve resulting in loss of all or substantial volume of tanks would be captured entirely by existing primary bund with no release to soil or water Likelihood: (Unlikely): Due to location within bund, damage to tanks is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity	As per PIRMP action plan	When required

					equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have higher fire risk.	with low risk of failure through corrosion. Residual Risk Assessment = Minor (2) Vs Rare (1) = LOW (2) As per PIRMP action plan		
	Incident #1 Failure of delivery hose during fill up from emulsion tank	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have higher fire risk. Medical emergency of person conducting transfer	Consequence: (Minor): Failure of delivery hose during transfer would result in material spilling onto the specially prepared drip catchment area. This is countersunk sealed ground lined with builders sand, with no Likelihood: (Unlikely): Due to fill process incorporating two people. One stationed at the connection point to the receiving vessel and the other at the stop switch and valve for the transfer pump and lines. Secondary emergency stop button and additional inline valves installed as a failsafe measure. Hoses are inspected prior to use and tagged out if defective. Residual Risk Assessment = Minor (2) Vs Rare (1) = LOW (2)	As per PIRMP action plan	When required
Diesel/Oils / Solvents	Incident #2 Significant loss of oils or solvents inside bund and/or spill tray during delivery and/or use. <u>Risk to environment:</u> hydrocarbons smothering aquatic and plant life, decreases in water quality	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have	Consequence: (Incidental): Failure resulting in loss of oils/solvents from packaged goods would be captured entirely by existing primary bund with no release to soil or water due to the concrete sealed floor. Likelihood: (Unlikely): Due to location within the bund, spillage during delivery and use is unlikely to occur. In addition hoses and decanting equipment are maintained in good structural integrity with low risk of failure. Residual Risk Assessment = Incidental (1) Vs Unlikely (2) = LOW (2)	As per PIRMP action plan	When required

	<u>Risk to human health:</u> contamination of waterbodies				higher fire risk.			
	Incident #2 Significant loss of diesel. Ruptured fuel tank resulting in material harm to the environment <u>Risk to environment:</u> hydrocarbons smothering aquatic and plant life, decreases in water quality <u>Risk to human health:</u> contamination of waterbodies	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have higher fire risk.	Consequence: (Incidental): Rupturing of internal tank resulting loss of diesel would be captured entirely by bund formed by second skin of tank with no release to soil or water. Likelihood: (Unlikely): Due to the tank within a tank design housing all fill up points and transfer pump, spillage during delivery and use is unlikely to occur. In addition hoses and decanting equipment are maintained well with a low risk of failure. Residual Risk Assessment = Incidental (1) Vs Unlikely (2) = LOW (2)	As per PIRMP action plan	When required
Mobile Plant	Incident #2 Significant hydraulic hose or fuel tank failure. <u>Risk to environment:</u> hydrocarbons smothering aquatic and plant life, decreases in water quality <u>Risk to human health:</u> contamination of waterbodies	Minor (2)	Unlikely (2)	L	Weather: Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas) Location of spill: spills near drainage lines or with equipment near waterbodies have higher risk of material harm. Spills near vegetation or rehabilitation areas have higher fire risk.	Consequence: (Incidental): Failure from fuel tank or hydraulic hoses would be maintained to a small localised area on site. Likelihood: (Rare): Hose or fuel tank failure from mobile plant would be minimal as prestart and regular maintenance programs are in place to capture and prevent such occurrences. Spills kits are also maintained and available in various areas. Inductions for all contractors demonstrating their accountabilities and responsibilities for reporting environmental incidents. Residual Risk Assessment = Incidental (1) Vs Rare (1) = LOW (1)	As per PIRMP action plan	When required

Crushing Plant	Incident #3 Excessive dust from RAP crushing/ processing operations or surface dust from mobile plant that leaves the site <u>Risk to environment:</u> dust smothering aquatic and plant life <u>Risk to human health:</u> risk of ingestion of fines via respiration. Site is rated as Tier 3 (lowest) site for respirable crystalline silica.	Incidental (1)	Unlikely (2)	L	Weather: Dry, windy conditions (increase wind erosion and dust transport). Summer months with long periods of extended dry conditions.	Consequence: (Incidental): The nature of RAP and the bitumen content reduces the potential for dust generation while crushing. Water sprays are also used. Site is sealed to reduce dust emissions. Likelihood: (Unlikely): It is rare that dust would leave the site due to controls and that crushing is carried out on a campaign basis. Dust suppressed with sprays, operations can be restricted in high wind periods. Residual Risk Assessment = Incidental (1) Vs Unlikely (1) = LDW (2)	As per PIRMP action plan	When required
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PART B: INCIDENT RESPONSE ACTIONS AND NOTIFICATION LOGS

EXTERNAL

14. PIRMP RESPONSE ACTIONS

Incident #1	Catastrophic failure of above ground emulsion tank resulting in material harm to the environment. Loss of product due to filling from emulsion tank resulting in material harm to the environment. Failure of drain valve on emulsion bund resulting in material harm to the environment Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bunds are capturing full volume of emulsion • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination. • Repair/replace tank • Refuel tank Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Site Manager • Call service provider (Jaden Francis) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Jaden Francis)
Scale of incident	Incident would be restricted to emulsion storage area with minimal external impact, however, potential for bund overflow or failure may result in surface water contamination that will require specialist investigation. Soil contamination is unlikely, as the site is sealed.
Evacuate	Only if fire or explosion potential exists. Site Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Site Manager • Environment Manager &/or HS Representatives External mandatory: • Immediate Reporting Contact Sheet to be used External non-mandatory: N/A
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.
Reporting and re-preparedness	See SOPs: • Incident Notification SOP (GRP-HSEQ-3-02)

Incident #2	Significant loss of diesel, oils or solvents inside bund and/or spill tray during delivery and/or use. Ruptured fuel tank resulting in material harm to the environment Significant hydraulic hose or fuel tank failure. Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bunds and/or spill trays are capturing full volume of oil/solvents • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Site Manager • Call service provider (Jaden Francis) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Jaden Francis)
Scale of incident	Incident would be restricted to Production Shed or Workshop with minimal external impact. However, potential for bund overflow or failure may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Site Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Site Manager • Environment Manager &/or HS Representatives External mandatory: • Immediate Reporting Contact Sheet to be used External non-mandatory: N/A
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel, oil, grease and advise on required clean-up.
Reporting and re-preparedness	See SOPs: • Incident Notification SOP (GRP-HSEQ-3-02)

Incident #3	Excessive airborne dust from crushing operations resulting in material harm to the environment or community Actions Required: • If crushing is causing significant dust emissions that is leaving site, operation should cease • Employees, Contractor/Visitor to notify site representative of issue immediately • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Dust suppression activity to commence immediately at the crusher, if it has not been previously • Daily monitoring to be undertaken to assess weather and site conditions
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Site Manager • Call service provider (Jaden Francis) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site (Jaden Francis)
Scale of incident	Incident would be localised to the area surrounding stockpile area, with minimal external impact.
Evacuate	Only if fire or explosion potential exists. Site Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Site Manager • Environment Manager &/or HS Representatives External mandatory: • Immediate Reporting Contact Sheet to be used External non-mandatory: N/A
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.
Reporting and re-preparedness	See SOPs: • Incident Notification SOP (GRP-HSEQ-3-02)

15. POLLUTION INCIDENT NOTIFICATION LOG

Person undertaking notification (Name/Function):		
Date and time when first become aware of the incident:		
Incident type:		
Comments:		

Initial immediate notification log				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of initial communication:				

16. IMMEDIATE NOTIFICATION SHEET SUMMARY

Table 7: Internal Reporting List

Name	Function	Phone number	Mobile number
	Manufacturing Supervisor		
	Health and Safety Business Partner		
	Manufacturing Operations Manager		
	Environmental Business Partner		
	Senior Environmental Business Partner		

Whilst personal contact details for the following are available in the PIRMP Controlled Version they do not appear in this public document

Table 8: External Reporting List

Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Strathfield City Council	(24hr) (02) 9748 9999
Public Health Unit (Camperdown) – Sydney South West AHS	HealthLink (24 hr): 0 - 1800 063 635 Head Office – Camperdown: 0 - (02) 9515 9420
WorkCover Authority of NSW	13 10 50 Company ABN if asked: 51 000 187 002
Government Authority - ring if relevant	Emergency notification phone number
Roads and Maritime Services (road spills)	132 701
NSW Office of Water	8838 7885
Bush Fire Control Officer	1800 049 933
Poisons Information Centre	131 126
Endeavour Energy (power line emergencies)	131 003

Police & Ambulance	000
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EXTERNAL