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November 2024

Pollution Incident Response Management Plan

(Part of Site Emergency Response Plan)

Wauchope Cement Depot



Version 13: November 2024



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Document Control Sheet

Version	Date	Prepared by	Approved By	Revision Details
Rev.0	30 Aug 2012			Final draft approved
Rev.1	19 Dec 2012			New Fire & Rescue NSW number for Pollution Incident notifications (replacing calls to 000)
Rev.2	1 Sep 2013			Changes reflecting company restructure.
Rev 3	1 Sep 2014			Annual Review
Rev 4	1 Sept 2015			Annual review. Neighbour contacts updated.
Rev 5	10 Nov 2016			Annual Review – Environmental Manager details updated
Rev 6	1 Nov 2017			Annual Review – HSE Manager details updated
Rev 7	1 Nov 2018			Annual Review – HSE Manager details updated
Rev 8	10 May 2020			Annual Review – contact details updated
Rev 9	25 Sep 2020			Annual Review – contact details updated
Rev 10	23 Nov 2021			Annual Review – contact details updated
Rev 11	30 Oct 2022			Annual Review – contact details updated
Rev 12	24 Nov 2023			Annual Review – contact details updated
Rev 13	20 Nov 2024			Annual Review. Updated format and change to contact details

Current Ver.	Date Implemented	PIRMP Test Schedule	Date for Next Review
13	November 2024	12 Months	November 2025



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1. Forward

This document was prepared to fulfil the requirements of the NSW Protection of the Environment Legislation Amendment Act 2011 (POELA Act) in terms of preparation and implementation of a pollution incident response management plan. This plan forms a part of the overall Boral Emergency Response Plan that was reviewed and amended to ensure that they cover all the new requirements of the POELA Act. The plan is kept, tested and implemented in accordance with the Act and the POEO(G) Regulation.

2. Purpose

The purpose of the Wauchope Cement Depot Pollution Incident Response Plan is to:

- Provide direction to the staff at Wauchope Cement Depot in responding to pollution incidents at the 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 Port Macquarie – Hastings 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 Wauchope Cement 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 kept on the site environmental board in the Wauchope Cement Main Office. A soft copy of the PIRMP and EPL 1503 are made available online at <https://www.boral.com.au/our-commitment/environmental-reporting>.

3. Legislative Requirements

The specific requirements for a 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). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).



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- 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).

4. Definition of Pollution Incident

The definition of a pollution incident is:

“A pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on 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.

Wauchope Cement is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

5. Scope

This PIRMP must be followed by employees, contractors and visitors of Wauchope Cement, to assist in the early response to and reporting of a pollution incident.

6. Potential Site Risks

Potential environmental pollutants are summarised in a site risk register entitled “Environment Aspects and Impacts” (**CMT-ENV-002-Form1 Wauchope Environmental Aspects and Impacts Register**) (see appendix C). This document considers; Aspect, Impact, Controls and Improvements for the sites known environmental hazards in the following areas:

- Fugitive Dust Emissions from plant areas
- Spills of liquids (e.g. diesel, oil) or powdered solid materials (e.g. cement), potentially leaving the site. Large spill of powdered solids may result in significant dust nuisance or lead to deposition of significant quantities of high pH particulate matter in the natural water courses.

- Fire and Smoke

No Hazardous Substances or Dangerous Goods are stored on site in the Wauchope Depot.

7. Harm Reduction

Spill Prevention (liquids and solids):

The risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out is reduced by measures outlined in Boral Cement Corporate SOP "CEM-ENV-014 Spill Prevention and Control. These measures include:

- Placement of spill-risk facilities away from sensitive environments (sufficient to allow for effective intervention prior to pollution occurring in the event of a spill)
- Use of secondary spill containment facilities such as bunding around all storage tanks and other areas where hazardous substances are stored;
- Ensuring that areas where risky activities such as storage tank/silo loading are undertaken are bunded and sealed;
- Avoiding risky activities at times when weather events may magnify the harm caused by a spill;
- Ensuring drainage structures can be sealed to halt passage of spilt fluids or powdered solids;
- Training of employees and contractors in good environmental practice.

The bunded areas must be capable of preventing the migration of any spillage or leakage to the surrounding environment. The requirement for bunding is relative to the level of risk and type of area. Bunding specifications are summarised in Australian Standard AS 1940:2004.

Maintenance:

All silos, tanks and pipe-work are inspected regularly and at least annually for signs of damage. Any defect in the walls or lining is repaired immediately using appropriate techniques. Damage to the tank or transfer hoses is dealt with immediately to prevent failure.

Any spilt liquid or powdered solid material must be promptly cleaned up in an appropriate manner – usually as contaminated matter.

Do not allow spilt liquid or stormwater to remain in the bund – it may accumulate and lead to overflowing. Rainwater entering the sump or bunded area should be regarded as potentially contaminated and must be disposed of in an authorised manner.

8. Safety Equipment

The site utilises a portable oil spill kit in a bag from Mantek (Spill Shark), located in the Office. This kit is capable of containing hydrocarbon spills up to 40L in volume. The bag's contents include:

- 10 x Polypropylene oil absorbent pads
- 1 x Spill Shark petroleum-based absorbent



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- 1 x waterless hand cleaner (Tomahawk)
- 1 x Quick Cure (steel-filled repair compound)
- 1 x brush and pan
- 1 Pair nitrile gloves (solvent resistant)
- 1 Pair of safety glasses
- Instruction for use and a bag with ties for disposal.

Fire protection system on site is addressed in the Emergency Response Plan. The types of fire extinguishers used on site are appropriate for their application.

9. Site Maps

The detailed map overleaf shows the location of the premises the licence refers to, the location of potential pollutants on the premises and the location of any stormwater drains on the premises

10. 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 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 personnel must be contacted immediately:

Name	Function	Phone number	Mobile number
██████	Operations Manager Cement – Supply Chain (NSW/ACT)		██████
██████	Depot Manager Cement		██████
██████	Environmental Business Support (NNSW)		██████
██████	Environmental Manager – NSW/ACT	██████	██████

4. The Site Manager or in case of his unavailability one of the Senior Management personnel listed above, is to immediately notify all Appropriate Regulatory Authorities specified in Section 12.
5. 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.
6. Boral’s Senior Management including environmental team members must be informed promptly of the fact of immediate notification to the Authorities.

All notifications are to be in line with standard operation procedure **CMT-ENV-001 – Wauchope Pollution Incident Notification**, located in WizBiz Reference Library (Site Procedures - Depots - NSW).

11. 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 in 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:

- i. **location and time of the pollution incident**
- ii. **type of the incident (spill, fire, unlicensed harmful discharge, etc)**
- iii. **assessed level of incident gravity: “it seems to be...” (e.g. “a relatively minor spill”; “major fire”, “explosion limited to one building”, etc.)**
- iv. **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 (Site/Operations Manager or Environment Manager) about the incident must prepare a Notification Log (a suitable form is attached) with the details of time of notifications and the persons who took to the call. The Authorities are expected to log the calls.

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.

12. Pollution Incident Authority Contact List

Government Authority – Compulsory Notifications	Emergency Notification Phone Number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Port Macquarie – Hastings Council	02 6648 4000
Public Health Unit – Port Macquarie	BH: 02 6588 2750 AH: 1300 555 555; 149377 Ask for Public Health Officer on call
WorkCover Authority of NSW	131 050 Company ABN asked: 62 008 528 523
Government Authority – ring if relevant	Emergency notification phone number
Police & Ambulance	000
Roads and Maritime Services (road spills)	132 701
NSW Office of Water	02 8838 7885
Bush Fire Control Officer	1800 049 933
Poisons Information Centre	131 126

13. Notification of Neighbours

Communication with the local community may also be undertaken depending on the circumstances of the pollution incident. Wauchope Cement 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.
- Door Knock

The current contact list for neighbours is attached in **Appendix B**. The initial notification should be brief and contain only a description of the environmental threat together with instructions what to do. For example:

- Due to a dust baghouse failure, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.

- Due to a diesel spillage onto a street from the site, a cleanup operation is being organised. Please be watchful for road closures in relation to this operation.

A follow up information on the resolution of emergency situation would be timely conducted also on the phone. If required, further information would be disseminated by means of leaflets in a letterbox drop.

14. Incident Response Training

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

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.

15. PIRMP Audit

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 plan will be conducted annually, and can be completed through the following methods:

- Simulated environmental emergency, or
- Desktop simulations.

16. 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.

A) 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.

B) TIME BASED

Wauchope Cement will review this management plan routinely every 12 months. The Plan review will include:

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

The Table below displays the testing of the PIRMP undertaken by the site

Version Tested	Description of Drill / Team Lead	Date
V6		08/03/2019
V7		14/5/2019
V8		01/10/20
V9		02/10/21
V10		29/10/22
V11		01/01/2023
V12		21/10/2024

APPENDIX A: Pollution Incident Emergency Response

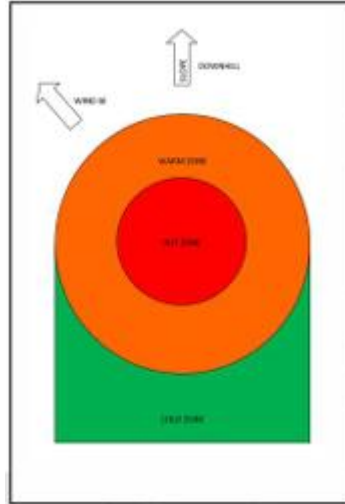
In the event of a pollution incident the risk of harm to human health will be minimised by engaging an appropriate pollution response as outlined below

1. **Stop the source:** If it's safe to do so, stop the process causing the spill/leak or other environmental incident.
2. **Isolate the area:** The first person to notice the spill or leak should remove themselves from the immediate area and take measures such as barricading the area to reduce the risk of exposure to others. This must occur without exposure to danger.
3. **Commence early notification:** The Manager or Supervisor must be notified immediately of the environmental incident. They in turn must immediately inform one of the persons nominated for notification of Authorities. If the environmental incident is significant, the nominated person implements early notification procedures to the relevant Authorities including emergency services. Alerting the potentially affected neighbours may also be required with regular updates provided as needed.
4. **Provide a 1st aid response (if required):** First aid kit including a trauma pack and instruction for use is located in the lunch room. Emergency shower is available in the blending shed, near the door. Eye wash is located in the lunch room. Appropriate PPE is worn by all staff during periods of potential exposure as outlined in relevant SDS.
5. **Identify the release to the greatest extent possible:** Do so without being at risk. This includes identifying:
 - The type of material released, e.g.
 - Class 2 Gases - compressed, liquefied or dissolved under pressure.
 - Class 3 Flammable Liquids
 - Solid material spill.
 - The label and Safety Data Sheet for the product should give information on safe clean-up.
 - The size of the release and whether the release has stopped;
 - Whether chemicals involved may be potentially incompatible; and
 - Any unusual features such as foaming, odour, smoke, etc.
6. **Determine the level of emergency:** review chemical risk assessments, seek internal advice from area specialists, review SDS's and seek professional advice from the fire brigade and/or hazardous material specialists.
7. **Determine if evacuation is required** and consider the impact that wind, rain, local geographical features such as hills and stormwater drainage systems may have in exposing persons at emergency assembly points. If in doubt commence evacuation to "cold zones" Following a Pollution / Hazardous Material Incident the Emergency Site is to be divided into Hot, Warm and Cold Zones - for management purposes. The Site Manager (or Weighbridge Operator if not present) is responsible for the management of the COLD ZONE, all personnel are to be evacuated from the hot/warm zone.

Hot Zone: This is the area of likely contamination. Only personnel wearing the appropriate level of protective clothing and equipment are to enter this zone. The area of the Hot Zone is defined, controlled and co-ordinated by the Hazmat Controller (FIRE BRIGADE).

Warm Zone: This is the area immediately surrounding the Hot Zone where decontamination takes place and personnel and equipment are prepared for deployment. Only personnel wearing the appropriate level of protective clothing and equipment are to enter this zone. The area of the Warm Zone is defined, controlled and co-ordinated by the Hazmat Controller (FIRE BRIGADE).

Cold Zone: This is the area immediately surrounding the warm zone. It is the support area where access is limited to support agencies personnel and equipment. This zone contains the Site Control, triage and treatment facilities and other marshalling and assembly areas. The Cold Zone is free of contamination and personnel protective clothing is not required. The area of the cold zone is defined by the site controller in consultation with the Hazmat Controller and managed by the Site Manager (or Weighbridge Operator if not present).



8. **Stop further release (if not done prior):** prevent further release by isolating the source of the release. (Trained personnel only with suitable PPE)
9. **Stop the release from spreading (if safe to do so):**
 - Prevent off-site release of contaminated stormwater: Protect stormwater grates with booms, covers or drain socks.
 - Liquid spills: Deploy spill kits to prevent further contamination dispersal, using appropriate absorbent/containment materials such as loose absorbent, socks or pads (land) and booms (water). See also CEM-ENV-014 Spill Prevention and Control.
 - Powdered solid spills: Lower down the silo rolling doors to minimise dust, cover stormwater grates to prevent ingress of solids.
 - Releases of pollutants into the air: Shut down ventilation systems to keep gases, vapours and dust from spreading.
10. **Large spills:** Summon specialist spill emergency response contractors (e.g. Transpacific Industrial Solutions, 1800 SPILLS).
11. **Fire:** If possible, endeavour to prevent fire-fighting water from entering the stormwater drains as it typically carries contamination. If possible, divert fire from areas containing materials that may generate toxic fumes when burned (e.g. stores of chemicals, cleaning aids, motor oil, etc).
12. **Dispose of contaminated spill clean materials and wastes using a licensed contractor.**
13. **If required, remediate the site.**

ALERT WEIGHBRIDGE, TEL 6585 1428

WEIGHBRIDGE OPERATOR

EARLY NOTIFICATION

**IMMEDIATELY CONTACT
BORAL CEMENT MANAGEMENT**

IMMEDIATE NOTIFICATION OF AUTHORITIES

- EPA – ENVIRONMENT LINE
- FIRE & RESCUE NSW
- COFFS HARBOUR COUNCIL
- WORKCOVER
- PUBLIC HEALTH UNIT (PORT MACQUARIE)
- OTHER AS APPROPRIATE

COMPLETE NOTIFICATION LOG

CMT-ENV-001

INFORM SENIOR BORAL MANAGEMENT:

**Site Manager to determine
IF ALERTING THE NEIGHBOURS is required**

EMERGENCY RESPONSE

**PROVIDE 1ST AID
ENSURE SAFETY OF OTHERS**

IDENTIFY THE SPILL/RELEASE

- The type of material released;
- The size of the release and whether it has stopped;
- Whether potentially incompatible chemicals are involved
- Any unusual features such as foaming, odour, smoke, etc.
- Discuss with hazardous material specialist / fire brigade
- Review SDS

CONTAIN THE SPILL / PREVENT FURTHER RELEASE

(If safe and if trained to do so)

**DETERMINE “COLD ZONE”
RESTRICT ENTRY TO WARM & HOT ZONES**

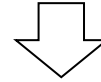
**Site Manager to determine
IF EVACUATION is required**

**WEIGHBRIDGE OPERATOR TO ALERT THE
NEIGHBOURS BY PHONE AND/OR DOOR
KNOCK**

**REFER TO APPENDIX B FOR NEIGHBOUR CONTACT
DETAILS**

**SUMMON EMERGENCY CLEANUP
CONTRACTORS**

Transpacific/Cleanaway, 1800 SPILLS



REMEDiate

APPENDIX B: Neighbours Contact List

Neighbours	Address	Emergency Notification Phone Number	Method
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

APPENDIX C: 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:				

Person undertaking notification (Name/Function):		
Date and time when additional information become available:		
Comments:		

Immediate notification of further pertinent information (if applicable)				
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 additional communication				

Wauchope Cement – Immediate Reporting Contact Sheet

INTERNAL NOTIFICATIONS			
Name	Function	Phone number	Mobile number
██████████	Operations Manager Cement – Supply Chain (NSW/ACT)		██████████
██████████	Depot Manager Cement		██████████
██████████	Environmental Business Support (NNSW)		██████████
██████████	Environmental Manager – NSW/ACT	██████████	██████████

EXTERNAL NOTIFICATIONS	
Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	1300 729 579
Port Macquarie – Hastings Council	02 6648 4000
Public Health Unit – Port Macquarie	BH: 02 6588 2750 AH: 1300 555 555; 149377 Ask for Public Health Officer on call
WorkCover Authority of NSW	131 050 Company ABN asked: 62 008 528 523

NOTE: A full listing of contact phone numbers of other potentially relevant government agencies is included in the PIRMP.