

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

**Created 22 November 2012
Latest reviewed October 2023**

PIRMP

EPA Licence No. 10699

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Issue of Pollution Incident Response Management Plan (PIRMP)

This Pollution Incident Response Management Plan (PIRMP) is available for all personnel onsite at ECORR 155 Newton Road, Wetherill Park to peruse in our document control "Directory". All personnel are bound under a confidentiality requirement not to provide the PIRMP to any third party, except with the written permission of the Managing Director of Eco Cycle Materials Pty Limited.

It is the responsibility of the General Manager and QSE Advisor to those persons to whom this PIRMP is issued to safeguard and have available the PIRMP as and when required, and to maintain the currency of the PIRMP by inclusion of inserts and amendments, as and when issued. Copies of the manual may be issued to additional persons/ organisations, on the basis of need and relevance.

The initiation of any of the procedures set out in the PRIMP is the responsibility of the Environmental Management Representative (EMR) this will be either the Site Supervisor, General Manager or Managing Director.

PIRMP Document Register

Document #	Issued to	Company	Address	Date Issued	Issue #
1	Martin O'Connell	Eco Cycle P/L	Level 1, 1838 The Horsley Dr, Horsley Park	27/10/2023	9
2	ECORR Yard (all personnel)	ECORR	155 Newton Rd Wetherill Park	27/10/2023	9

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

1. Introduction – Pollution incident notification requirements

As of 6 February 2012, licensees under the POEO Act and anyone carrying on an activity or occupying a premises who becomes aware of a pollution incident are required to report pollution incidents **immediately** instead of 'as soon as practicable' under section 148 of the POEO Act.

The protocols for contact in the event of a pollution incident are outlined in **Section 2** of this PIRMP, relevant contact details are presented in **Section 4** and the adopted criteria for a pollution incident is outlined in **Section 3**.

Sections 5 to 7 outline the preventative actions and general operational response protocols to a pollution incident.

This pollution Incident Response Management Plan also forms part of ECORR's overall Operational Environmental Management Plan (OEMP))

2. Protocol for industry notification of pollution incidents

The NSW EPA describe the protocol for notification of pollution incidents on the webpage

[Report pollution \(nsw.gov.au\)](https://www.nsw.gov.au/report-pollution)

Notification for a pollution incident is required if;

- a pollution incident causes or threatens to cause ‘material harm to the environment’. Material harm 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.’

Notification is required even where ‘harm to the environment is caused only in the premises where the pollution incident occurs’, as specified in section 147(2).

Section 148 of the POEO Act sets out additional pollution incident notification requirements.

The occupier of premises, the employer or any person carrying on the activity which causes a pollution incident is to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.

- 2.1 *Call 000 if the 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.*
- 2.2 *If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:*
 - *the EPA phone Environment Line on 131 555*
 - *the Ministry of Health (02) 9391 9000*
 - *Fire and Rescue (000)*
 - [Disease notification - Infectious diseases \(nsw.gov.au\)](https://www.nsw.gov.au/disease-notification-infectious-diseases)
 - *SafeWork NSW – phone 13 10 50*
 - *Fairfield Council – phone 02 9725 0222*

3. Environmental incident definition, pollution incident notification criteria and response

A pollution incident is defined as:

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.’ (POEO Act)

Pollution incidents on or around the site are considered to have occurred in the course of the Contractor’s activities in the following circumstances:

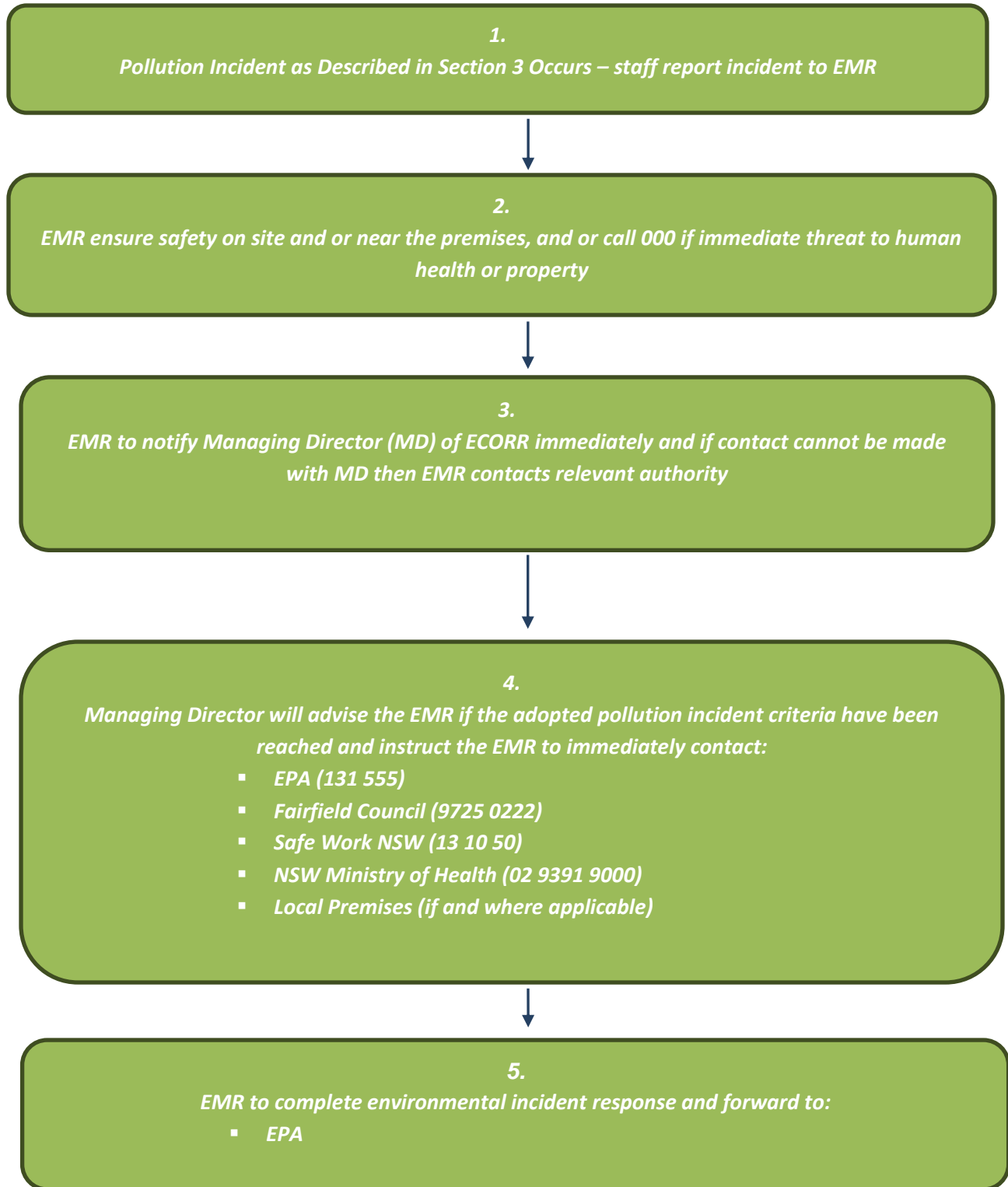
- *‘If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial; and*
- *If actual or potential loss or property damage (including clean-up costs) associated with a pollution incident exceeds \$10,000.’*

Above criteria is based on **s147** of the *Protection of the Environment Operations Act 1997* (NSW) and has been adopted in this PIRMP as the threshold for notification purposes.

The above definition has been adopted for the purposes of an environmental incident in this PIRMP. The proposed response to an environmental incident is as outlined below and in Table 1:

- EMR to ensure site safety, move people from immediate areas where safety is a concern;
- EMR to take any practical steps to contain the hazard and prevent it from spreading;
- EMR to notify the Managing Director of ECORR and if necessary, the relevant authority, if the Managing Director cannot be contacted EMR must notify each relevant authority.
- The Managing Director is to decide if the adopted pollution incident criteria threshold has been reached. If the adopted pollution incident threshold has been reached, the EMR is to contact immediately contact the relevant authorities listed in 2.2 (EPA and Fairfield Council); and the relevant information about a pollution incident required consists of the following:
 - The time, date, nature, duration and location of the incident,
 - The location of the place where pollution is occurring or is likely to occur,
 - 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,
 - Other information prescribed by the regulations.
- The EMR is to complete and environmental incident report form (FORM-008).
Once completed, a copy of the incident report form must be forwarded to Fairfield Council and the EPA and other legislative governing authorities if triggers reportable criteria.

TABLE 1
Flow Chart for PIRMP



4. Emergency contact details

Table 2 outlines emergency contact details and is to be maintained by the EMR.

Table 2. Emergency contact details

Service required	Company	Contact name	Phone number
EMR	ECORR	Joe Culmone	0407 381 426
EMR (alternate 1)	ECORR	Michael Harloff	0438 162 519
EMR (alternate 2)	ECORR	Martin O’Connell	0407 747 243
Police			000
Fire & Rescue			000
Ambulance			000
Report Environmental Incident	EPA Pollution Line		131 555
	Fairfield Council		(02) 9725 0222
	Department of Industry	Incident hotline	1300 814 609
	SafeWork NSW		13 10 50
	Ministry of Health		02 9391 9000
Injured wildlife	WIRES		1800 641 188
Infrastructure Services			
Water	Sydney Water Service Centre		132 090
Power	Ausgrid		131 388
Gas	AGL		131 003
Electricity	Integral Energy		131 909
Telecommunications	Telstra		132 203

5. Environmental incident preventative actions and responses

Table 3 outlines the potential environmental incidents identified during the environmental review process to-date, the proposed preventative actions, the response actions to be under-taken and the person/s responsible for implementation of appropriate actions. Other potential environmental incidents may be identified after the operation commences, these should be documented by the EMR and **Table 3** should be updated as they are identified.

In the Event of an incident on site methods of communicating with staff, subcontractors and visitors on site:

- All staff and sub-contractors can be contacted on site by two way radio or mobile phone
- All Visitors can be contacted via Mobile phone or by site staff.

Pre-emptive actions also include:

- Accreditation to ISO14001, IS9001 and ISO45001 to ensure effective management systems and procedures in place and implementation of systems and preventative maintenance
- Audits
- Regular Site Inspections and implementation of controls where identified
- Bunded and containment areas for fuel storage and stored liquids
- Restricted and limited access areas as per site signage and induction procedures
- Installation of equipment for combatting an incident
- Monitoring on site for air (dust), silica exposure levels, stormwater, asbestos and recovered aggregates testing and groundwater monitoring.

Table 3. Summary of potential environmental incidents, preventative actions, and proposed response actions.

Potential environmental incident	Potential Risk	Preventative actions	Responses actions to incident	Responsible persons
Excessive dust	2 – Frequent / Minor	<ul style="list-style-type: none"> Operate water trucks/irrigators Sprinklers – site/conveyor Cease or limit operations based on risk assessment Daily environmental inspection report Implementation of traffic management plan Grading/upkeep of unsealed haul roads Monthly environmental reviews Silt fencing 	<ul style="list-style-type: none"> Contact EMR; Water down areas identified as the source of dust immediately; and Cease works if weather conditions are adverse. 	All personnel and EMR
Silica	3 – Occasional / Critical	<ul style="list-style-type: none"> 6 monthly respirable dust report Pre-employment medical Employee health monitoring (annual for production staff including; labourers, spotters and maintenance coordinator and every two years for operators) Health and safety training in relation to respirable dust and silica P2 Fit testing (annual) Supply PPE Control dust on site Implement environmental management procedure and daily environmental inspections Monitor use of mandatory PPE on site Enclosed plant operation Implementing sign posted speed limits on site 	<ul style="list-style-type: none"> EMR, Human Resources and medical facility to work toward a return to work program. This may include additional health monitoring, adjustment to workers role/responsibilities, PPE etc Investigate cause of incident and respond accordingly. Record incidents of this kind and monitor for trends or deficiencies in Safety Management System. Ensure worker compliance to control measure. Dust control on site 	All personnel EMR HR
Asbestos	3 – Occasional / Critical	<ul style="list-style-type: none"> Reject all loads with contamination as per PROC 008 Incoming Loads & Unacceptable waste Procedure Asbestos not accepted on site and rejected – recorded and register kept All tipped materials wet down area 3 stage Inspection of all loads; weighbridge, as tipping and before loading, during tip off and 	<ul style="list-style-type: none"> Follow PROC 008 ‘Incoming Loads acceptable and unacceptable waste Procedure,’ Spotters to reject whole load when asbestos identified within, Rejected Load form and Register to be completed, Whole load to be wet down and reloaded All personnel to wear PPE – P2 dust mask, coveralls, gloves, goggles when outside of operating plant 	All personnel and EMP

		<p>after tipped as well as during the crusher feeding process</p> <ul style="list-style-type: none"> Worker PPE, and enclosed Plant operation 	<ul style="list-style-type: none"> Remove all personnel from the area Removal and disposal to approved facility by qualified personnel where required 	
Spills Fuel / Chemical spill / Fire	3 – Remote / Critical	<ul style="list-style-type: none"> All chemicals to be stored in accordance with the Code of Practice for safe use and storage in Agricultural / COP Managing Risks of Hazardous Chemicals in the Workplace / AS 1940: The storage and handling of flammable and combustible liquids All diesel/fuel storage tanks to be banded to contain spills and disposed of by qualified contractors. HS&DG Audits and Register with quantities and SDS for each. Refueler contractor to undergo SWMS review prior to site access 	<ul style="list-style-type: none"> Contact EMR All re-fueling vehicles are to contain a spill kit Re-fueler subcontractors to undergo SWMS review post incident Use spill kit to contain the spill at the mixing and storage sites. Dispose of contaminated materials appropriately; and clean and decontaminate this site. If discharge enters waterway and criteria outlined in Section 3 of this PIRMP is met ring EPA Pollution line 131 555. Emergency Evacuation plan implemented, contain fire if safe to do so, follow first aid plan and account for all on site at EEA. 	All personnel and EMR
Stored Pollutants spill, escape, unknown quantities	3 – Remote / Critical	<ul style="list-style-type: none"> All banded as per COP Know inventory of Maximum Storage Quantities: Diesel Engine oil 410l (2x205l drums), Hydraulic oil and Transmission oil 410l (1x 205l drum of each), Grease 80kg, Coolant 1x 205L drum. All chemical liquids stored within banded/spill kit designated areas with spill bund capacity more than stored drums. Conduct Audits and update SDS register and SDS's. 	<ul style="list-style-type: none"> All re-fueling vehicles are to contain a spill kit Spill kit at oil storage locations. Use spill kit to contain and absorb the spill at the mixing and storage sites. Dispose of contaminated materials appropriately; and clean and decontaminate this site. If discharge enters waterway and criteria outlined in Section 3 	All personnel and EMR
Stormwater and Sediment losses to waterways	2 – Remote / Minor	<ul style="list-style-type: none"> Maintain Erosion & Sediment Controls on site Follow EPM & SECMP 	<ul style="list-style-type: none"> Contact EMR Where relevant, repair sediment controls; and Cease works if weather conditions are adverse. If discharge enters waterway and criteria outlined in Section 3 of this PIRMP ring EPA Pollution Line 131 555. 	All personnel and EMR
Raw Stockpiles of Incoming feed stock. Concrete, Brick, Asphalt and GSW soils, potential Asbestos contamination,	2- Remote/Major	<ul style="list-style-type: none"> Reject all loads with contamination as per PROC 008 Asbestos not accepted on site and rejected – recorded and register kept 	<ul style="list-style-type: none"> Follow PROC 008 ‘incoming acceptable and unacceptable waste protocol procedure,’ Spotters to reject whole load when asbestos identified within, 	All personnel and EMR

Chemical contamination.		<ul style="list-style-type: none"> • All tipped materials wet down area • 3 stage Inspection of all loads; weighbridge, as tipping and before loading, during tip off and after tipped as well as during the crusher feeding process • Worker PPE, and enclosed Plant operation • GSW Reports comply with all site requirements as the training module NSW Standards for Managing Construction Waste Awareness & NSW C&D Waste Facilities Environmental Laws & Licence Awareness. 	<ul style="list-style-type: none"> • Rejected Load form and Register to be completed, • Whole load to be wet down and reloaded • All personnel to wear PPE – P2 dust mask, coveralls, gloves, goggles when outside of operating plant • Remove all personnel from the area • If there has been a breach of the licence or EPA guidelines after notifying senior management, ring EPA Pollution Line • 131 555.or nominated EPA officer by phone or Email. 	
Finished product Stockpiles (Aggregates, Roadbases, Sands, soils Etc). Potential Asbestos contamination, Chemical contamination, Potential RRO/RRE noncompliance.	2- Remote/Major	<ul style="list-style-type: none"> • Reject all incoming loads with contamination as per PROC 008 • Asbestos not accepted on site and rejected – recorded and register kept • All tipped materials wet down area • 3 stage Inspection of all loads; weighbridge, as tipping and before loading, during tip off and after tipped as well as during the crusher feeding process • Worker PPE, and enclosed Plant operation • Finished product is checked daily and complies with site requirements as the training module NSW Standards for Managing Construction Waste Awareness & NSW C&D Waste Facilities Environmental Laws & Licence Awareness. • Stockpile testing in accordance to ECO-MAN-15 and AS 1141.3.1:2021 • ECORR complaints register • ISO 14001 Accreditation achieved • Greenstar Accreditation achieved 	<ul style="list-style-type: none"> • Stockpiles to be isolated and barriers applied and notify management. • If there has been a breach of the licence or EPA guidelines after notifying senior management, ring EPA Pollution Line • 131 555 or nominated EPA officer by phone or Email. • ECORR Environmental Complaints Register • QSE Performance Summary 	All Personnel and EMR

An environmental risk assessment rating system adapted from **Environment Australia (2007)**, which is outlined in **Table 4**, has been adopted for the assessment of risks associated with potential environmental risks listed in **Table 3**.
The results of this assessment will be included in the operational EMP for this facility.

Table 3A Raw Stockpiles of Incoming feed stock. Concrete, Brick, Asphalt and GSW soils, Maximum Quantity

Product	Approx Maximum Quantity (Tonnes)
Concrete	100,000
Brick	100,000
Asphalt	50,000
GSW	100,000

Table 3B Finished Product Stockpiles

Product	Approx Maximum Quantity (Tonnes)
10mm Aggregate	20,000
20mm Aggregate	20,000
30mm Aggregate	20,000
30-40mm Aggregate	20,000
40-70mm Aggregate	20,000
DGB 20 Roadbase	50,000
Bedding Sand	50,000
RRO Material	50,000

Table 4. Environmental risk significance rating table*.

Risk of Occurrence						
May be as a result of a continuously operated process, activity or occurrence	Continuous	1	4	4	4	4
May be a result of a frequently used process, activity or occurrence.	Frequent	1	2	3	4	4
May be a result of a little used process, activity or occurrence.	Occasional	1	2	3	4	4
May be as a result of a chain of unusual events leading to an environmental incident	Remote	1	2	3	3	4
May be a result of a chain of extraordinary events leading to an environmental accident/disaster.	Improbable	1	2	3	3	4
		Positive	Minor	Critical	Major	Catastrophic
	Significance (Degree of Impact)	Positive impact on environment thus positive impact on business	Limited and/or localised impact on the environment and/or business	Medium scale impacts, wider implications to environment and/or business	Serious long term implications for environment and/or business	Serious permanent damage to business and/or environment (e.g. loss of licence, restriction of activity)

*From: Environment Australia, 2007. Model Environmental Management System for Commonwealth Agencies.

Key to Risk Significance Rating	1	Positive
	2	Low Risk
	3	Medium Risk
	4	High Risk

Incident Response Procedure to Water Pollution

Fuel, Oil or Chemical Spills

The works carried out on this premises include use of fuel, oil and chemicals, particularly in the workshop. The following is a sequential procedure implemented for any incidents involving these toxins which could potentially pollute the stormwater system

A. Control the spill

If a spill occurs identify the source and assess whether it can be controlled (stopped) in a safe manner. Protect storm water drains and waterways by placing earth, sand or absorbent material around storm water entrance points and alongside waterways to prevent pollution.

B. Contain the spill

Construct bunds of Spill Kit pillows to stop fuel, oil or chemical spreading out. Especially, prevent discharge into stormwater drainage, natural watercourses or onto private property.

→ For small spills

Spread absorbent material from Spill Kit to absorb fuel, oil or chemical.

→ For large spills

Use a grader to construct earth bunds around spill or use sandbags. Spread sand on ground to soak up fuel, oil or chemical. If discharge enters waterway and mixes with water, isolate it by booms.

C. Clean up the spill

Soak up the spill with absorbent material and ensure the surface is left clean. Material used to clean up the spill should be placed in a watertight container labelled "Spill Kit Waste". When this drum is full it should be removed from site as prescribed waste. In some instances, an EPA (DECC) licensed tanker (educator truck) may be required to vacuum up the liquid.

→ For small spills

Load used pads, pillows and absorbent material into watertight container for disposal at appropriate waste site.

→ For large spills

Load sand/earth/sandbags into watertight container on utility (small quantities) or truck lined with plastic (large quantities) for disposal at appropriate waste site. Sweep site with broom to collect all sand or earth for disposal, as appropriate.

Sediment / Silt Contamination to Storm Water

For uncontrolled release of dirty water into waterway from water quality control structure or bunded area.

If discharge enters waterway and mixes with water, isolate it by booms and call the EPA (DECC) Pollution Line 131 555 IMMEDIATELY.

Air / Noise Pollution

ECORR has an Operation Environmental Management Plan (OEMP) which clearly stipulates the allowable tolerances for Noise and Air pollution. It also includes details on what to do in the case of any infringements to Noise and Air pollution.

Dust Monitoring is carried out on a quarterly basis to ensure applied limits are adhered to.

Noise Monitoring is carried out on a yearly basis to ensure tolerances are not exceeded.

If either Air or Noise Pollution occurs which exceeds those stipulated in the OEMP the following response should be carried out:

A. Control the Source

Immediately stop the action / source that is causing the air / noise pollution.

B. Assess the Parameters

Assess what actions can be taken to prevent / stop / reduce air / noise pollution. Implement them before continuing with works.

C. Monitor the Source

Carry on with works while closely monitoring air / noise to ensure limits are not exceeded.

6. Emergency equipment requirements and storage locations

Table 6 outlines the locations of emergency response equipment.

Table 4: Emergency equipment requirements

Name of equipment	Storage location	Comment
Spill kit	On each re-fueling unit. Within hazardous substance storage area	Instructions are provided with kit. Training conducted of use of spill kits. Notify of use and replace items within. Locations on site map through induction process.
Fire extinguisher/s	On each piece of onsite equipment, office, fuel storage area, chemical storage area, offices and maintenance shed as per signage.	To be maintained in satisfactory working order and checked by qualified external contractor 6 monthly or after use. Only use when two people involved and safe to do so, never take on large or uncontrolled fires. Ensure staff trained in different types of extinguishers and safe use of extinguishers. Locations on site map through induction process.
Eyewash	At the maintenance area and weighbridge toilet facility Within First Aid Kits on site (see TMP)	Maintain in satisfactory working order and test to ensure working correctly. Locations on site map through induction process.

7. Incident reporting and Notification

As per conditions of consent within 7 days of detecting an exceedance of goals/limits/performance criteria of this PIRMP or an environmental incident (as defined in **Section 3**), ECORR shall report the exceedance to Fairfield Council. All Incidents are to be reported on an Incident Report Form.

The report shall:

- describe the date, time and nature of the exceedance/incident;
- identify the cause (or likely cause) of the exceedance/incident;
- describe what action has been taken to date; and
- describe the proposed measures to address the exceedance/incident.

7.1 Community Notification Strategy

Who Will Be Notified?

All community stakeholders that may be affected by an incident will be notified. Appropriate to the incident circumstance, these include:

- Neighbouring residential property owners (see attached map 5)
- Neighbouring commercial properties (see attached map 5)
- General public within the vicinity of the site:
 - Pedestrians
 - Motorists
 - Users of nearby recreational facilities (sporting facilities, parks etc)
 - Nearby water courses (rivers, streams, dams etc.) used for recreational and/or commercial purposes
- Facilities located downstream from water courses affected by a spill
- Schools
- Churches
- Nursing homes

When Will the Community be Notified?

If an incident presents a significant risk of causing material harm to persons, property, and/or the environment to an area that is not trivial, any community stakeholders within these areas will be notified at the earliest convenience.

What will be communicated?

Communication will be relevant to the incident and risk and consider:

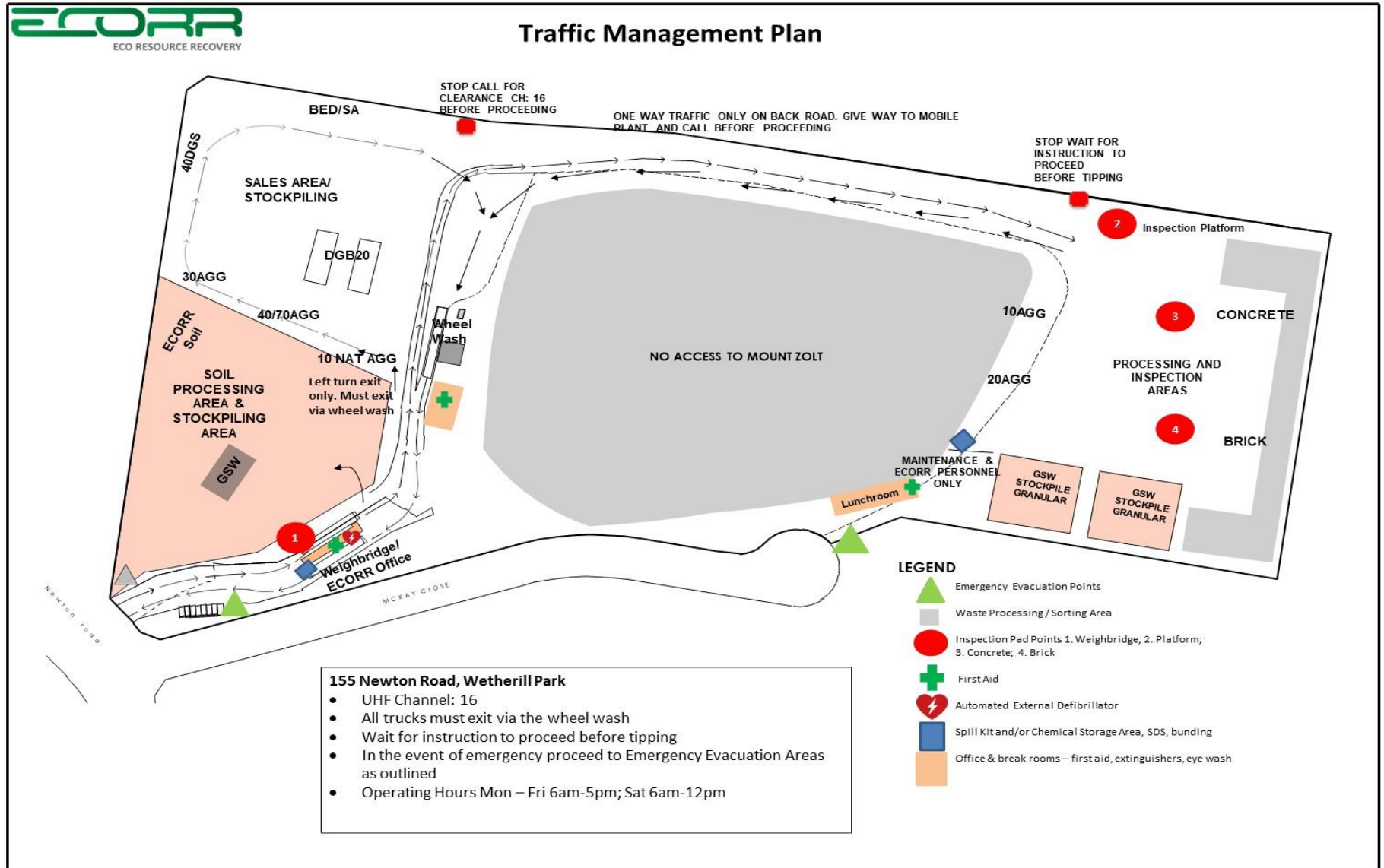
- The nature of the incident
- Phase of response (how it will be communicated)
- Type of pollutant
- Weather conditions and contribution to the incident
- Significance of emission
- Location and offsite impact or potential impacts
- Likelihood of exposure
- Possible impacts upon any sensitive receptors

How Will the Community be Notified?

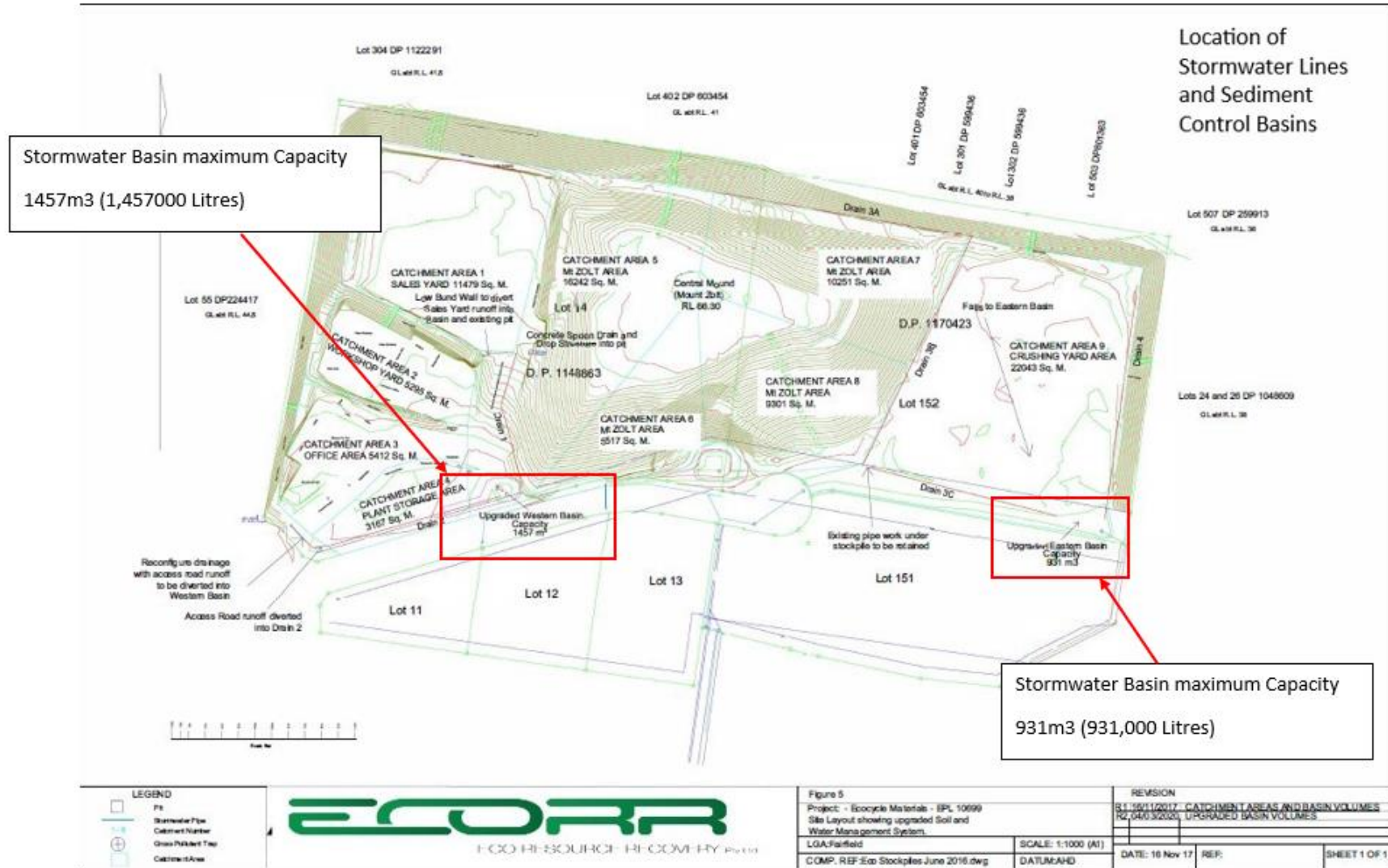
When it has been established that a community stakeholder is at risk from an incident that has the potential to cause material harm the following process will be implemented:

- 1) Community stakeholders will be contacted immediately after the relevant authorities have been contacted by telephone (or face to face if this is not possible).
- 2) Stakeholders will be advised of recommended actions that can be taken to prevent or minimise material harm e.g. evacuate area, shut all doors and windows, cease drawing water for irrigation purposes.
- 3) After the incident has been contained and managed by key personnel and authorities subsequent communication will be undertaken by the EPA / SafeWork Coordinators. Appropriate to the circumstance, these may include:
 - Follow up telephone calls and/or face to face contact (door knocking)
 - Meetings with stakeholders
 - Written correspondence containing updates in regard to safety and environmental concerns associated with the pollution incident
 - Letterbox drops
 - Website notification
 - Social media notification

Map 1 – Site, Infrastructure, Equipment, Storage Areas, Traffic and Evacuation Map



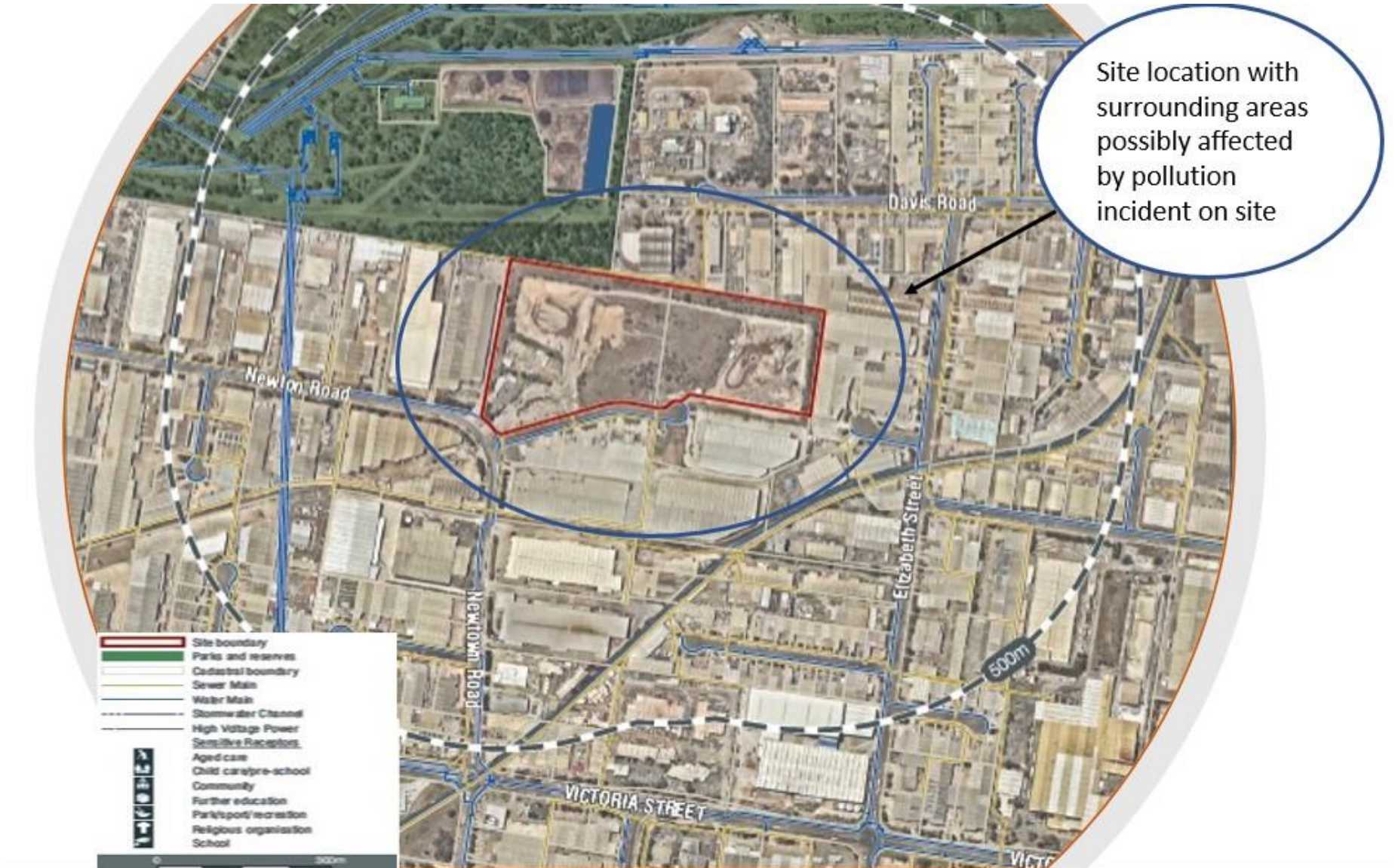
Map 2 – Site Stormwater Drainage Lines and Sediment Control Map



Map 3 – Site Stormwater Pits locations



Map 4 – Site Location and Surrounding areas possibly affected by a pollution incident – direct neighbor’s



Map 5 – Direct Neighbors surrounding ECORR site



Company Name	Contact Name	Contact Number	Contact Email Address
Austcor Packaging		02 9757 7500	reception@austcor.com
Suez Wetherill Park		02 9609 3377	
Forest One	Geoff Smith	02 9757 6904	nsw@forest1.com
Ron Crouch Transport	John Crouch	0439 133 502	
Thussenkrupp Materials Australia Pty Ltd	Darren Cook	0438 285 020 – 02 9757 7777	sales.tkmaterials.au@thyssenkrupp.com
Phibro Animal Health Pty Ltd		02 9616 3700	
Digga Australia - NSW Branch		1300 234 442	nsw@digga.com
H+K International (McD)		02 8031 6800	Sales.au@hki.com
Snapes Australia		02 9756 25 33	admin@snapesaustralia.com.au
BlastOne International		02 9193 9000	sales.nsw@blastone.com
Universal Mobile Tower Hire		02 9609 4111	admin@universaltowerhire.com.au
FlameStop Australia Western Sydney		02 9725 3322	westsyd@flamestop.com.au
Austasia Packaging		02 9725 1168	
CHEP		13 24 37	
AAA Packers		02 9729 1333	hello@aaafresh.com.au
Berendsen Fluid Power Sydney		1800 706369	
JR Waste & Recycling		1300 829278	info@jrwasteandrecycling.com.au
AYVA Packaging		02 97254080	

Map 6 – Location of PPE storage on site.



ECORR Weighbridge



ECORR Rear Yard Workshop Storage Area

8. COMPLAINTS

8.1 Complaints register

A telephone complaints line has been established to receive any complaints from members of the public in relation to this site. Details of the complaints line are below:

COMPLAINTS TELEPHONE LINE:

Environmental Management Representative

Joe Culmone 0407 381 426

Michael Harloff 0438 162 519 General Manager

Office 02 9757 3210

8.2 Complaints response protocol

If a complaint is received the following procedures are to be followed:

- Details of the complaint are to be recorded by the EMR in the complaints register and the complainant is to be advised verbally that the matter will be investigated by ECORR in accordance with the Environmental Management Plan for the operation.
- The EMR is to investigate the complaint and to liaise with the complainant to attempt to resolve the complaint. Where necessary, the EMR will make appropriate changes to onsite management practices / procedures to resolve the complaint.
- If, through a subsequent investigation, the EMR becomes aware of an environmental incident (as defined in **Section 3** of this PIRMP), then Fairfield Council is to be notified in writing at the first available opportunity.
- If the criterion outlined in **Section 5** of this PIRMP is met, then EPA is to be notified and at the first available opportunity.
- If the dispute is resolved, the agreed outcome is to be documented (in writing) and forwarded to the complainant, Fairfield Council and the EPA.
- If the dispute is not resolved, the EPA and Fairfield Council are to be advised in writing.
- If directed by the EPA or Fairfield Council, ECORR will contract the services of an independent consultant to review the specific details of the complaint and make appropriate recommendations to resolve the matter.

- At closure of the complaint the following information will have been recorded:
 - a. Date of complaint;
 - b. Name of complainant;
 - c. Contact details of complaint (if supplied);
 - d. A record of notification of Fairfield Council, EPA, DPE, WC;
 - e. A summary actions taken to address the subject matter of the complaint;
 - f. Investigation outcomes; and
 - g. A record of notification of the complainant of the investigation outcomes.

Records will be kept for at least 4 years after the complaint was registered.

9. REVIEW

This PIRMP is to be reviewed annually as part of the AEMR or on as needed basis. Updates of this PIRMP will be supplied to all persons listed in the document register at the beginning of this PIRMP and reviewed with relevant site personnel through informal and formal training and toolbox meetings. Training and procedure review will include the objective of staff training, staff trained, dates and comments. All changes to PIRMP and training records will be updated and kept as per site document control procedures. Reporting on compliance with PIRMP obligations will be reported to the EPA annually in the annual return submission.

10. Testing of PIRMP

This PIRMP will be tested at least once a year by means of a mock drill and within one calendar month of any pollution incident occurring where the plan has been activated. All records of drills conducted will be recorded on FORM-016 which includes the following details as a minimum:

- Type of drill tested
- Objective of the drill/training
- Date of drill
- Person(s) carrying (in charge) out testing
- Names of personnel involved in the drill
- Location
- Effectiveness of drill and training
- Debrief

Testing of the PIRMP as a result of a pollution incident occurring, does not qualify as an annual PIRMP drill/test. This test may take the form of a post-incident debrief to assess whether;

- The PIRMP was implemented efficiently during the activation
- There were areas of the PIRMP that did not work or could be improved
- All contact details were correct and up to date
- Maps were accurate and sufficiently detailed
- Any other details in the PIRMP need to be updated.

Reporting on compliance with PIRMP obligations will be reported to the EPA annually in the annual return submission.

A record of the testing of PIRMP will be maintained in this plan. See below table.

Pollution Incident Management

Response Plan Testing

Date of Test	Name of Person who coordinated testing	Recommended Actions/Outcomes from Testing or PIRMP Review
22/01/2014		PIRMP Dry test.
10/07/2014		PIRMP Tested - Excessive Dust during Windy Conditions.
01/12/2015		PIRMP Test.
14/12/2016		PIRMP Test. PIRMP Reviewed and Updated (now Issue2 14 th December 2016)
16/08/2017		PIRMP Test. PIRMP Reviewed and Updated (now Issue3 16 th June 2017)
03/04/2018	JC	PIRMP Test. PIRMP Spill emergency mock dill, see drill minutes and Sign off.
	JC	PIRMP Review and Updated (now Issue4 3 rd April 2018) see Sign off register.
	JC	Copies distributed to all operational site staff – office lunch shed.
13/05/2019	JC/NP	PIRMP Review and update to reflect PROC 008 Incoming Acceptable and
	JC/NP	Unacceptable Protocol and external training for all relevant site personnel on
	JC/NP	EPA Legislation, Standards for managing Construction Waste in NSW, EPL
	JC/NP/RB	And after PIRMP Drill conducted 13/5/19. See sign off register. Copies
	JC/NP	Distributed to all operational site staff – office lunch shed.
03/09/2019	JC/NP	PIRMP Chemical Spill Mock Drill. See drill minutes and sign off register
	JC/RB	Storage of Chemicals
	JC/RB	Bunding & maintenance of chemicals including spill kits
	JC/NP	Review of EPL & EPA Show Cause
22/05/2020	JC	PIRMP Test. PIRMP Mock Fire Drill. See drill minutes and sign off register
	JC/SN	PIRMP Review and Updated (now Issue 6) See sign off register
	SN	Copies distributed to all operational site staff
10/02/2021	MH	PIRMP Test. Mock Diesel spill. See spill minutes and attendance sheet
26/7/2021	MH	PIRMP review and updated (now issue 7) – insert neighbour contacts
	SN	Updated Traffic Management Plan
10/03/2022	MH	PIRMP Test. Site preparation for heavy rain/severe weather forecast. See Emergency Drill Briefing Checklist.
22/07/2023	MR	PIRMP Test. Mock diesel spill. See Emergency Drill Briefing Checklist.
27/10/2023	MR	PIRMP Review – Update TMP, Add Silica into Table 3

11. POLLUTION INCIDENT NOTIFICATION PROTOCOL

Step one: What is a Pollution Incident?

A Pollution Incident occurs when material harm to the Environment is caused or threatened.

Step Two: What is material harm to the Environment?

(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 and loss includes the reasonable costs or losses to prevent mitigate or make good harm to the environment.

Step Three: Who must notify?

- a) the person carrying on the activity
- b) an employee or agent carrying on the activity
- c) an employee carrying on the activity
- d) the occupier of the premises where the incident occurs.

Step Four: Who do I notify?

A person engaged as an employee in carrying on an activity must immediately after becoming aware of the incident, notify the employer of the incident and all relevant information about it.

Step Five: Who must be notified about a Pollution Incident?

1. Call 000 if the incident presents an immediate threat to human health or property.

Ask for: > Fire and Rescue NSW
> NSW Police
> NSW Ambulance Service

AND/OR

2. EPA 131 555
- Local Council, Fairfield Council Phone: (02) 9725 0222
 - Ministry of Health Phone: (02) 9391 9000
www.health.nsw.gov.au/publichealth/infectious/phos.asp
 - Safe Work NSW Phone: 131 050

Examples of Potential Environmental Incidents

Excessive Dust

- Cease work, and
- Contact Environmental Management Representative
- Water Areas identified as source of dust

Fuel/Oil/Chemical Spills

- Always refuel in a bunded area
- Use spill kits in the field
- If discharge enters a waterway and may cause \$10,000 damage and/or clean up costs notify employer immediately.

Sediment Loss to a Waterway

- Cease work and contact Environmental Management Representative
- Repair Sediment controls
- If discharge enters a waterway and may cause \$10,000 damage and/or clean up costs notify employer immediately.

Excluded Pollution Incidents

Odour

A pollution Incident does **NOT** include Odour. Odour incidents **DO NOT** have to be notified.