

# **POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**Created 22 November 2012**

**Latest reviewed July 2025**

## **PIRMP**

**EPA Licence No. 10699**

|                                               |                                                             |                       |
|-----------------------------------------------|-------------------------------------------------------------|-----------------------|
| ECO-MAN-14 Issue 10<br>Review date: July 2025 | Authorised: Martin O'Connell<br>Position: Managing Director | PIRMP<br>Page 1 of 31 |
| Project: Lot 152 in DP 1170423                |                                                             |                       |

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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 ECORR Pty Ltd.

It is the responsibility of the Operations Manager, Production Manager and QSE Advisor to;

- Disperse this PIRMP to relevant personnel
- Safeguard and have available the PIRMP as and when required,
- 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, Operations Manager, Production 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,<br>Horsley Park | 27/10/2023  | 9       |
| 2          | ECORR Yard<br>(all personnel) | ECORR         | 155 Newton Rd Wetherill Park                  | 27/10/2023  | 9       |
| 3          | ECORR Yard<br>(all personnel) | ECORR         | 155 Newton Rd Wetherill Park                  | 24/03/2025  | 10      |
| 4          | ECORR Yard<br>(all personnel) | ECORR         | 155 Newton Rd Wetherill Park                  | 23/07/2025  | 11      |

## 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 \(nsw.gov.au\)](http://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.

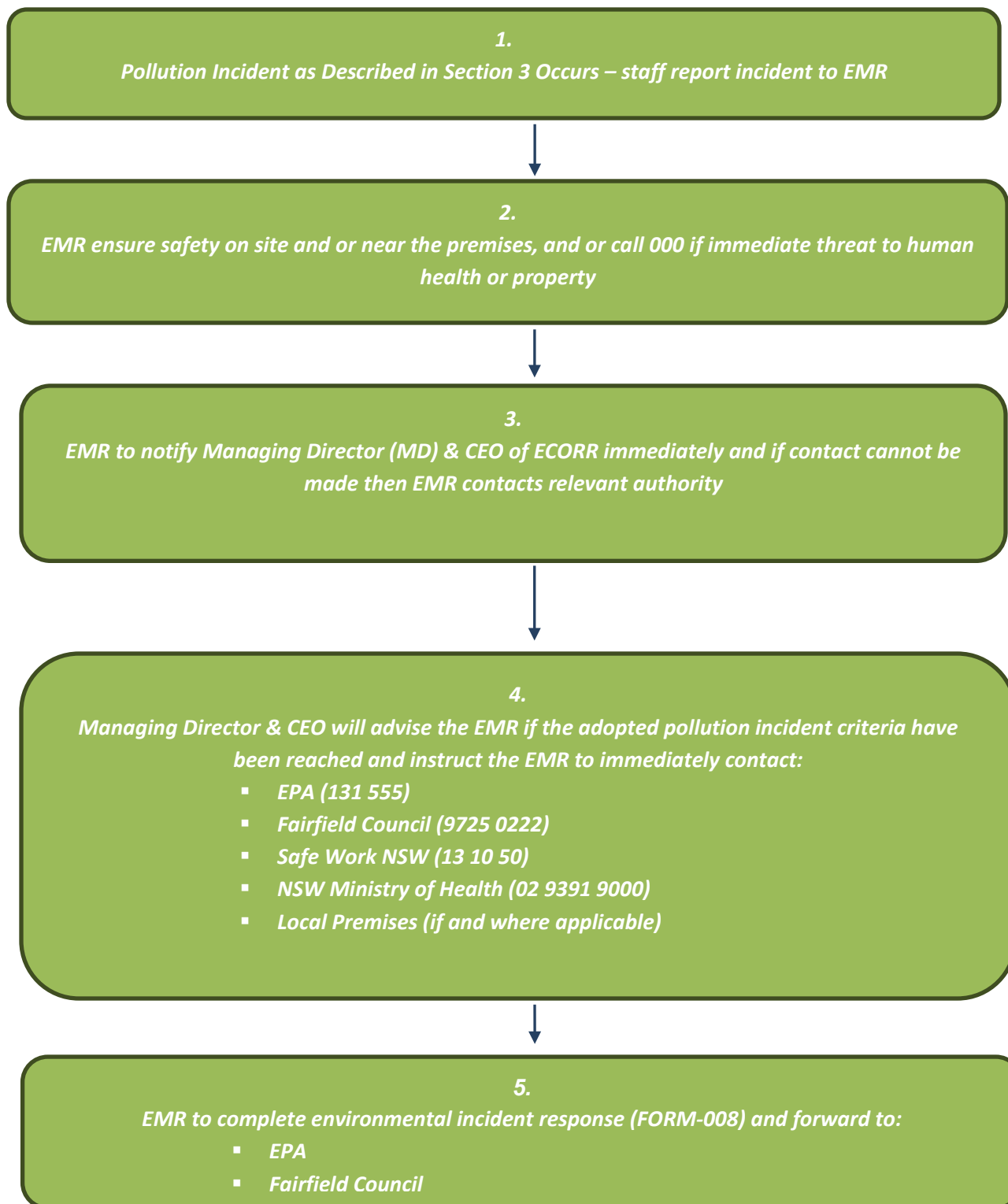
The above definition has been adopted for the purposes of an environmental incident in this PIRMP. The proposed response to an environmental incident is as outlined below and in Table 1:

- 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 and CEO of ECORR and if necessary, the relevant authority, if the Managing Director cannot be contacted EMR must notify each relevant authority.
- The Managing Director & CEO 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 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                       | Cameron Madeira   | 0438 782 214   |
| EMR (alternate 2)             | ECORR                       | Martin O'Connell  | 0407 747 243   |
| EMR (alternate 3)             | ECORR                       | Victoria Sherwood | 0401 892 386   |
| 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"> <li>• Operate water trucks/irrigators</li> <li>• Sprinklers – site/conveyor</li> <li>• Cease or limit operations based on risk assessment</li> <li>• Daily environmental inspection report</li> <li>• Implementation of traffic management plan</li> <li>• Grading/upkeep of unsealed haul roads</li> <li>• Monthly environmental reviews</li> <li>• Silt fencing</li> </ul>                                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Contact EMR;</li> <li>• Water down areas identified as the source of dust immediately; and</li> <li>• Cease works if weather conditions are adverse.</li> </ul>                                                                                                                                                                                                                                                                                                                           | All personnel and EMR      |
| Silica                           | 3 – Occasional / Critical | <ul style="list-style-type: none"> <li>• 6 monthly respirable dust report</li> <li>• Pre-employment medical</li> <li>• Employee health monitoring</li> <li>• Health and safety training in relation to respirable dust and silica</li> <li>• P2 Fit testing (annual)</li> <li>• Supply PPE</li> <li>• Control dust on site as above</li> <li>• Implement environmental management procedure and daily environmental inspections</li> <li>• Monitor use of mandatory PPE on site</li> <li>• Enclosed plant operation</li> <li>• Implementing sign posted speed limits on site</li> </ul> | <ul style="list-style-type: none"> <li>• 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</li> <li>• Investigate cause of incident and respond accordingly.</li> <li>• Record incidents of this kind and monitor for trends or deficiencies in Safety Management System.</li> <li>• Ensure worker compliance to control measure.</li> <li>• Dust control on site</li> </ul>                  | All personnel<br>EMR<br>HR |
| Asbestos                         | 3 – Occasional / Critical | <ul style="list-style-type: none"> <li>• Reject all loads with contamination as per PROC 008 Incoming Loads &amp; Unacceptable waste Procedure</li> <li>• Asbestos not accepted on site and rejected – recorded and register kept</li> <li>• All tipped materials wet down area</li> <li>• 3 stage Inspection of all loads; weighbridge, as tipping at point for concrete and at tipping point for brick.</li> <li>• Material is also checked during crusher feeder process.</li> <li>• Worker PPE</li> </ul>                                                                           | <ul style="list-style-type: none"> <li>• Follow PROC 008 ‘Incoming Loads acceptable and unacceptable waste Procedure,’</li> <li>• Spotters to reject whole load when asbestos identified within,</li> <li>• Rejected Load Register to be completed</li> <li>• Whole load to be wet down and reloaded</li> <li>• All personnel to wear PPE – P2 dust mask, coveralls, gloves, goggles when outside of operating plant</li> <li>• PAPR 3M mask for workers with facial hair</li> <li>• Remove all personnel from the area</li> </ul> | All personnel and EMP      |

|                                                                                                                                 |                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                          |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|                                                                                                                                 |                          | <ul style="list-style-type: none"> <li>Enclosed Plant operation</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Removal and disposal to approved facility by qualified personnel where required</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                          |
| Spills<br>Fuel / Chemical spill /<br>Fire                                                                                       | 3 – Remote /<br>Critical | <ul style="list-style-type: none"> <li>All chemicals to be stored in accordance with the Code of Practice for managing risks of hazardous chemicals in the workplace (SafeWork NSW) and AS 1940: The storage and handling of flammable and combustible liquids</li> <li>All diesel/fuel storage tanks to be bunded to contain spills and disposed of by qualified contractors.</li> <li>HS &amp; DG Audits as per WHS &amp; ENV reviews.</li> <li>Register with quantities and SDS for each HS &amp; DG</li> <li>Refueler contractor to undergo SWMS review prior to site access</li> </ul> | <ul style="list-style-type: none"> <li>Contact EMR</li> <li>All re-fueling vehicles are to contain a spill kit</li> <li>Re-fueler subcontractors to undergo SWMS review post incident</li> <li>Use spill kit to contain the spill at the mixing and storage sites.</li> <li>Dispose of contaminated materials appropriately; and clean and decontaminate this site.</li> <li>If discharge enters waterway and criteria outlined in <b>Section 3</b> of this PIRMP is met ring EPA Pollution line 131 555.</li> <li>Emergency Evacuation plan implemented, contain fire if safe to do so, follow first aid plan and account for all on site at EEA.</li> </ul> | All personnel<br>and EMR |
| Stored Pollutants spill,<br>escape, unknown<br>quantities                                                                       | 3 – Remote /<br>Critical | <ul style="list-style-type: none"> <li>All bunded as per COP</li> <li>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.</li> <li>All chemical liquids stored within bunded/spill kit designated areas with spill bund capacity more than stored drums.</li> <li>Conduct Audits and update SDS register and SDS's.</li> </ul>                                                                                                                          | <ul style="list-style-type: none"> <li>All re-fueling vehicles are to contain a spill kit</li> <li>Spill kit at oil storage locations.</li> <li>Use spill kit to contain and absorb the spill at the mixing and storage sites.</li> <li>Dispose of contaminated materials appropriately; and clean and decontaminate this site.</li> <li>If discharge enters waterway and criteria outlined in <b>Section 3</b></li> </ul>                                                                                                                                                                                                                                    | All personnel<br>and EMR |
| Stormwater and<br>Sediment losses to<br>waterways                                                                               | 2 – Remote / Minor       | <ul style="list-style-type: none"> <li>Maintain Erosion &amp; Sediment Controls on site</li> <li>Follow EPM &amp; SECMP</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Contact EMR</li> <li>Where relevant, repair sediment controls; and</li> <li>Cease works if weather conditions are adverse.</li> <li>If discharge enters waterway and criteria outlined in Section 3 of this PIRMP ring EPA Pollution Line 131 555.</li> </ul>                                                                                                                                                                                                                                                                                                                                                          | All personnel<br>and EMR |
| Raw Stockpiles of<br>Incoming feed stock.<br>Concrete, Brick, Asphalt<br>and GSW soils, potential<br>Asbestos<br>contamination, | 2- Remote/Major          | <ul style="list-style-type: none"> <li>Reject all loads with contamination as per PROC 008</li> <li>Asbestos not accepted on site and rejected – recorded and register kept</li> <li>All tipped materials wet down area</li> </ul>                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Follow PROC 008 'incoming acceptable and unacceptable waste protocol procedure,"</li> <li>Spotters to reject whole load when asbestos identified within,</li> <li>Rejected Load form and Register to be completed,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                          | All personnel<br>and EMR |

|                                                                                                                                                                                 |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Chemical contamination.                                                                                                                                                         |                 | <ul style="list-style-type: none"> <li>• 3 stage Inspection of all loads; weighbridge, as tipping at point for concrete and at tipping point for brick.</li> <li>• Material is also checked during crusher feeder process.</li> <li>• Worker PPE, and enclosed Plant operation</li> <li>• GSW Reports comply with all site requirements</li> <li>• onsite training module NSW Standards for Managing Construction Waste Awareness &amp; NSW C&amp;D Waste Facilities Environmental Laws &amp; Licence Awareness.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Whole load to be wet down and reloaded</li> <li>• All personnel to wear PPE – P2 dust mask, coveralls, gloves, goggles when outside of operating plant</li> <li>• PAPR 3M mask for workers with facial hair</li> <li>• Remove all personnel from the area</li> <li>• If there has been a breach of the licence or EPA guidelines after notifying senior management, ring EPA Pollution Line</li> <li>• 131 555.or nominated EPA officer by phone or Email.</li> </ul> |                       |
| <p>Finished product Stockpiles (Aggregates, Roadbases, Sands, soils Etc).</p> <p>Potential Asbestos contamination, Chemical contamination, Potential RRO/RRE noncompliance.</p> | 2- Remote/Major | <ul style="list-style-type: none"> <li>• Reject all incoming loads with contamination as per PROC 008</li> <li>• Asbestos not accepted on site and rejected – recorded and register kept</li> <li>• All tipped materials wet down area</li> <li>• 3 stage Inspection of all loads; weighbridge, as tipping at point for concrete and at tipping point for brick.</li> <li>• Material is also checked during crusher feeder process.</li> <li>• Worker PPE, and enclosed Plant operation</li> <li>• Finished product is checked daily and complies with site requirements as the training module NSW Standards for Managing Construction Waste Awareness &amp; NSW C&amp;D Waste Facilities Environmental Laws &amp; Licence Awareness.</li> <li>• Stockpile testing in accordance to ECO-MAN-15 and AS 1141.3.1:2021</li> <li>• ECORR complaints register</li> <li>• ISO 14001 Accreditation achieved</li> <li>• Greenstar Accreditation achieved</li> </ul> | <ul style="list-style-type: none"> <li>• Stockpiles to be isolated and barriers applied and notify management.</li> <li>• If there has been a breach of the licence or EPA guidelines after notifying senior management, ring EPA Pollution Line</li> <li>• 131 555 or nominated EPA officer by phone or Email.</li> <li>• ECORR Environmental Complaints Register</li> <li>• QSE Performance Summary</li> </ul>                                                                                               | 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                     | <b>Continuous</b>                      | 1                                                               | 4                                                                  | 4                                                                       | 4                                                              | 4                                                                                                       |
| May be a result of a frequently used process, activity or occurrence.                             | <b>Frequent</b>                        | 1                                                               | 2                                                                  | 3                                                                       | 4                                                              | 4                                                                                                       |
| May be a result of a little used process, activity or occurrence.                                 | <b>Occasional</b>                      | 1                                                               | 2                                                                  | 3                                                                       | 4                                                              | 4                                                                                                       |
| May be as a result of a chain of unusual events leading to an environmental incident              | <b>Remote</b>                          | 1                                                               | 2                                                                  | 3                                                                       | 3                                                              | 4                                                                                                       |
| May be a result of a chain of extraordinary events leading to an environmental accident/disaster. | <b>Improbable</b>                      | 1                                                               | 2                                                                  | 3                                                                       | 3                                                              | 4                                                                                                       |
|                                                                                                   |                                        | <b>Positive</b>                                                 | <b>Minor</b>                                                       | <b>Critical</b>                                                         | <b>Major</b>                                                   | <b>Catastrophic</b>                                                                                     |
|                                                                                                   | <b>Significance (Degree of Impact)</b> | 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.

|                                        |          |                    |
|----------------------------------------|----------|--------------------|
| <b>Key to Risk Significance Rating</b> | <b>1</b> | <b>Positive</b>    |
|                                        | <b>2</b> | <b>Low Risk</b>    |
|                                        | <b>3</b> | <b>Medium Risk</b> |
|                                        | <b>4</b> | <b>High Risk</b>   |

## 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.<br>Within hazardous substance storage area. At front of weighbridge.                             | Instructions are provided with kit. Training conducted of use of spill kits. Notify of use and replace items within. Locations on site identified on signage.                                                                                                                                                                                                |
| Fire extinguisher/s | On each piece of onsite equipment, 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<br>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 **FORM-008 Environmental Incident Near Miss 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?

**THE MANAGING DIRECTOR & CEO ARE TO COORDINATE NOTIFICATION TO STAKEHOLDERS. ECORR PERSONNEL MUST CONSULT WITH MANAGING DIRECTOR & CEO PRIOR TO ANY STAKEHOLDER COMMUNICATION.**

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:

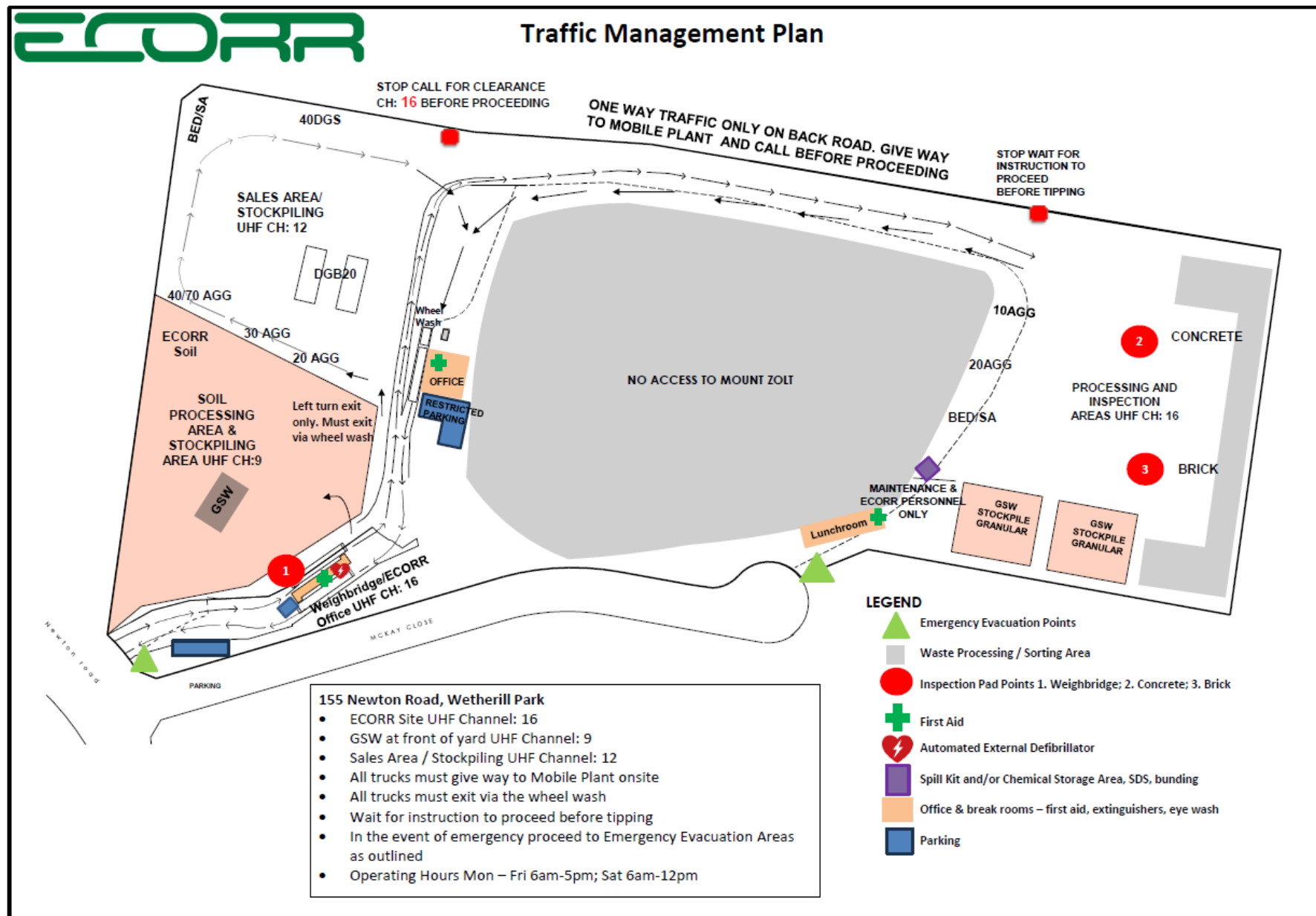
- The nature of the incident
- Phase of response (how it will be communicated)
- Type of pollutant
- Weather conditions and contribution to the incident
- Significance of emission
- Location and offsite impact or potential impacts
- Likelihood of exposure
- Possible impacts upon any sensitive receptors

## How Will the Community be Notified?

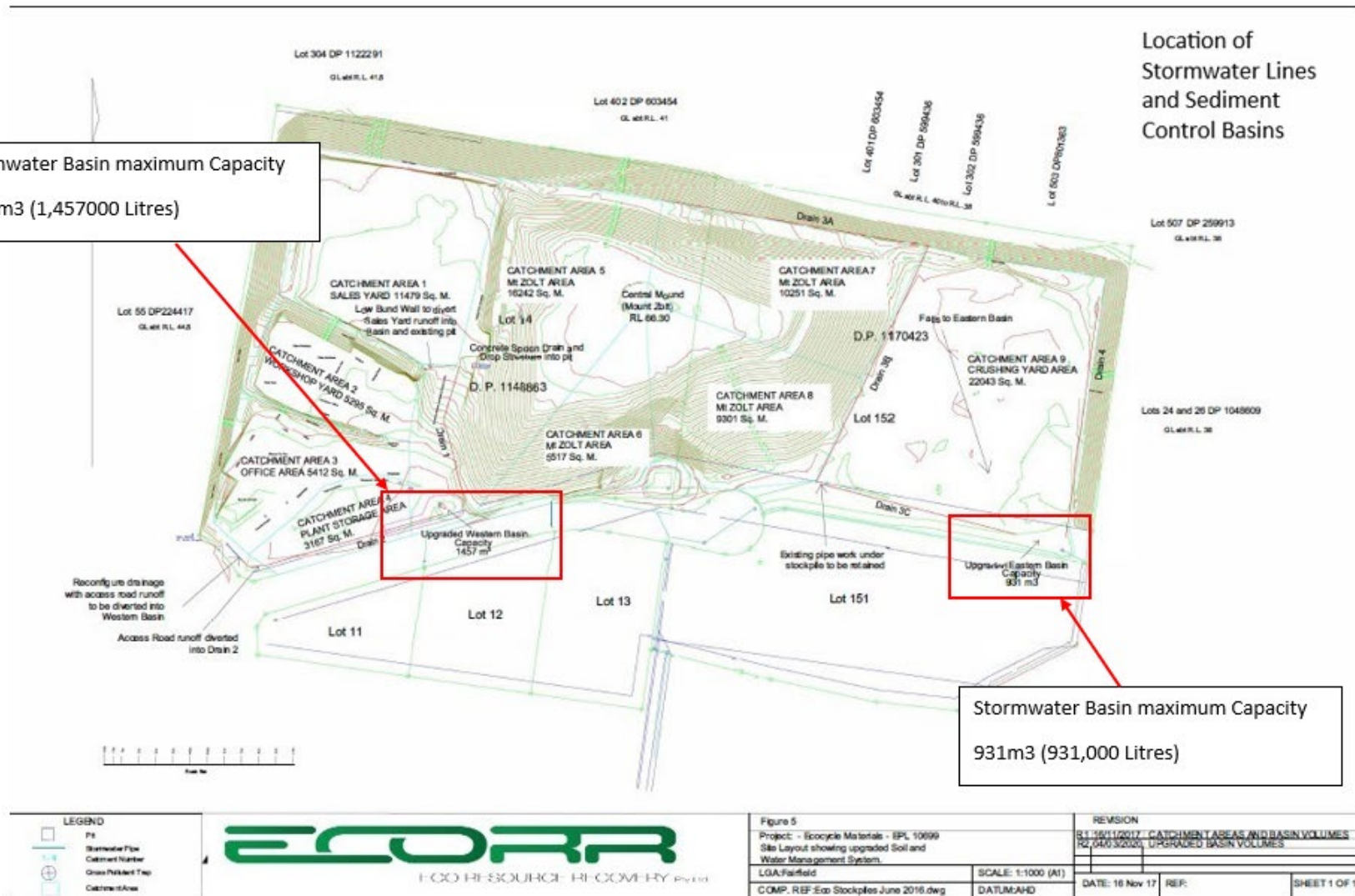
When it has been established that a community stakeholder is at risk from an incident that has the potential to cause material harm the following process will be implemented:

- 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

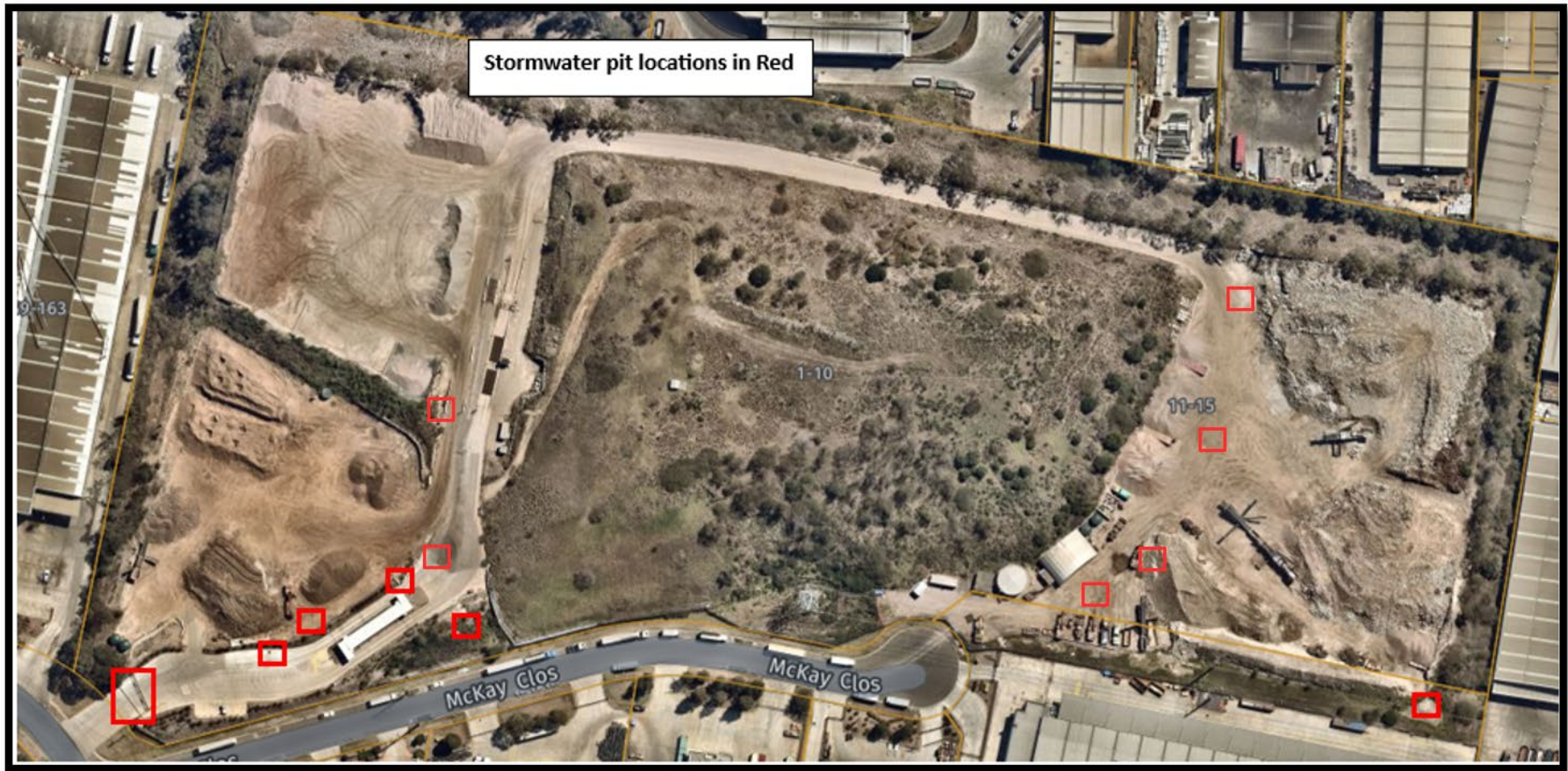


Map 2 – Site Stormwater Drainage Lines and Sediment Control Map



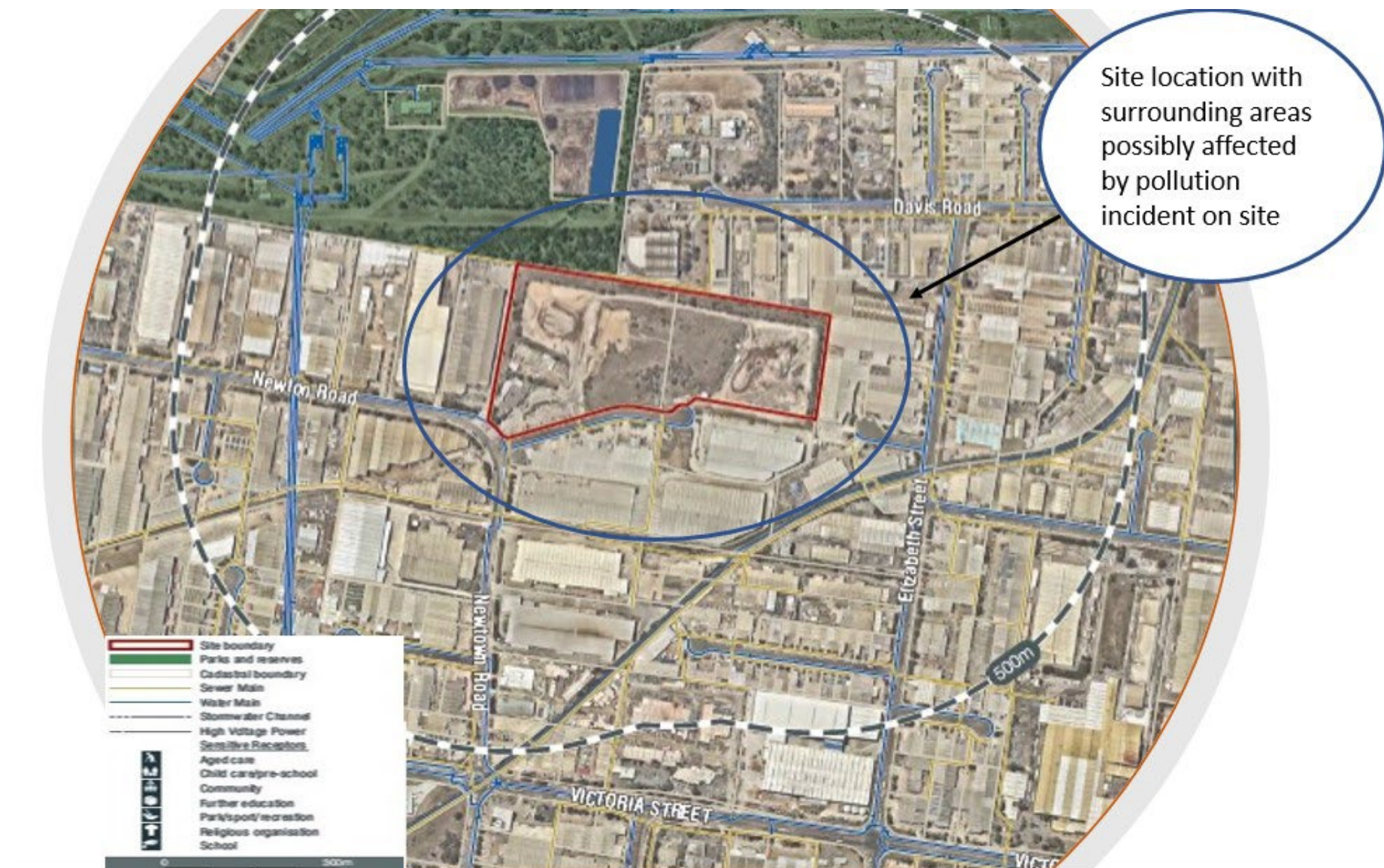


## Map 3 – Site Stormwater Pits locations





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





**Map 5 – Direct Neighbors surrounding ECORR site**





# Pollution Incident Response Management Plan



| Company Name                             | Contact Name | Contact Number              | Contact Email Address                 |
|------------------------------------------|--------------|-----------------------------|---------------------------------------|
| Dine & Grind Cafe                        |              | 02 8750 2965                |                                       |
| AWJ Civil                                |              | 02 9757 2999                |                                       |
| H+K International (McD)                  |              | 02 8031 6800                | Sales.au@hki.com                      |
| Digga Australia - NSW Branch             |              | 1300 234 442                | nsw@digga.com                         |
| Forest One                               | Geoff Smith  | 02 9757 6904                | nsw@forest1.com                       |
| Thussenkrupp Materials Australia Pty Ltd | Darren Cook  | 0438 285 020 – 02 9757 7777 | sales.tkmaterials.au@thyssenkrupp.com |
| AAA Packers                              |              | 02 9729 1333                | hello@aaafresh.com.au                 |
| ABC Tissue                               |              | 02 8787 2222                |                                       |
| FlameStop Australia Western Sydney       |              | 02 9725 3322                | westsyd@flamestop.com.au              |
| Castlegate James                         |              | 1300 786 253                |                                       |
| Industrial Batteries Australia NSW       |              | 1300 044 976                |                                       |
| Veolia Wetherill Park                    |              | 1300 651 116                |                                       |
| ABBE – NSW                               |              | 02 9757 7500                |                                       |
| Steel Power International                |              | 1300 077 078                | sales@steelpower7.com.au              |
| Australian Corrugated Box Co             |              | 02 9756 3311                |                                       |
| BlastOne International                   |              | 02 9193 9000                | sales.nsw@blastone.com                |
| Austasia Packaging                       |              | 02 9725 1168                |                                       |
| CHEP                                     |              | 13 24 37                    |                                       |
| Berendsen Fluid Power Sydney             |              | 1800 706369                 |                                       |
| JR Waste & Recycling                     |              | 1300 829278                 | info@jrwasteandrecycling.com.au       |
| AYVA Packaging                           |              | 02 97254080                 |                                       |

# Pollution Incident Response Management Plan

## 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**

**Cameron Madeira 0438 782 214**

**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 environmental 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, SafeWork;
  - 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 <sup>th</sup> December 2016)                                                                    |
| 16/08/2017   |                                        | PIRMP Test. PIRMP Reviewed and Updated (now Issue3 16 <sup>th</sup> 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 <sup>rd</sup> 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                                                                                                    |
| 31/05/2024   | MR                                     | Emergency Response signage was covered by foliage (signage relocated within close vicinity). More 1 <sup>st</sup> aiders were required to be trained. |
| 29/05/2025   | MR / CM                                | Stormwater upgrades.                                                                                                                                  |
| 24/07/2025   | SH                                     | PIRMP Test.                                                                                                                                           |

## 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. ECORR Managing Director & CEO will direct or delegate further communications.

### 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](http://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.