POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Austral Masonry NSW
Prospect (EPL# 4664)

Adapted from Horsley Park to suit Prospect PIRMP by M. Burns *Reviewed 15/12/2017*

Contents

1 OVERVIEW

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009.*

This procedure covers the Prospect site with the Environmental Protection License of 4664.

Under the legislation referred to above, the EPL also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

1. **Background** –describes main features of the regulation
2. **Hazard, Probability and pre-emptive actions to prevent pollution incident risks –** describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
3. **Maps –** map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures –** what to do in case of material harm
5. **Early warnings and communication to neighbours –**when to contact neighbours in case of pollution incidents and info required for website
6. **Training –**information to be passed on to staff and contractors
7. **Updating of plan –**frequency of updates
8. **Testing –** frequency of drills to test effectiveness of PIRMP
9. **Implementing of plan –** reference to legislation requirement to carry out aspects of the plan during a pollution incident

Introduction

The Prospect site is licensed to Austral Masonry (NSW) Pty Ltd.

This site is covered by an Environment Protection Licence (EPL) number 4664 for the scheduled activities of manufacture of concrete products.

Purpose

This PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community.

The purpose of this plan is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.

- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks

- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur.

The Prospect site consists of 3 plants that hold the EPL number of 4664. Plant 1, 2 and VAP (value added process) are located at Clunies Ross St, Prospect. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of Prospect staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2010

Documentation

The environmental incident register is used to record and monitor all environmental incidents within Prospect. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept on the G drive.

2 EVALUATION

This Pollution Incident Response Management Plan (the Plan) complies with the requirements under the:

- *POEO Act 1997* Part 5.7A Duty to Prepare and implement Pollution Incident Response Management Plans
- *POEO (General) Regulation 2009 Part 3A*

The requirements under the legislation are supported by the *Environmental Guidelines: Preparation of pollution incident response management plans*, which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licenses (EPLs). Prospect operates under EPL no. 4664 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas, which this plan covers, are described in Table 1 PIRMP requirements.

TABLE 1

PIRMP Legislation covered under this Plan		Reference
POEO Act Part 5.7		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on Actions to take after an incident and coordinating with authorities	5 + references
153D	Keeping of plan:	6.3
153E	Testing of plan:	9
153F	Implementation of plan:	10
POEO (General) Regulation 2009		
98C(a)	Hazard assessment:	3.4 +appendix 1
98C(b)	Probability assessment:	3.4 + appendix 1
98C(c)	Pre-Emptive Action:	3.4 + appendix 1
98C(d)	Pollutant Inventory Types:	3.4 + appendix 1
98C(e)	Pollutant Inventory Quantities:	3.4 + appendix 1
98C(f)	Safety Equipment:	3.4 + appendix 1
98C(g)	Staff Contacts:	5.1.1
98C(h)	Authority Contact:	5.1.4 + 6.2 + references
98C(i)	Early Warnings Neighbours:	3.4 & 6
98C(j)	Staff Safety:	3.4
98C(k)	Maps location of pollutants:	3.4 and 4
98C(l)	Early Warnings General:	3.4 and 6
98C(m)	Training of Staff:	7
98C(n)	Timing of Testing:	9
98C(o)	Updating of Plan:	8
98C(p)	Plan Testing:	9
98D(1)	Availability of plan:	6.3
98D(2)	Publishing Plan Parts:	6.2 + 6.3
98D(3)	Procedures under Act:	5 + references
98D(4)	Privacy Protection:	6.3
98E(1)	Testing of the Plan:	9
98E(2)	Minimum Testing requirements:	9

3 HAZARD, PROBABILITY AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

3.1 Overview

This chapter deals with the POEO (General) Regulation 2009's sections 98(a) to 98(f) and partially covers s98(j). These sections deal with the hazard, Probability and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The Prospect site undertakes activities of concrete product manufacturing.
The most likely environmental emergencies that may be encountered at Prospect sites include:

- Hydrocarbon spill that reaches a drain, sewer or natural watercourse. The sources may include but are not limited to:
  - Diesel drums; and
  - Hydrocarbon drums.
- Water pollution with oxides, solvents or other chemicals. The sources may include but are not limited to:
  - IBCs containing admixtures and waste slurries; and
  - Liquid oxide tanks.
- Gas leak and/or fire. The sources may include but are not limited to:
  - Diesel supply; and
  - Gas cylinders.
- Air pollution from dust emissions. The sources may include but are not limited to:
  - Raw material and waste stockpiles.

This Plan also considers both air and water based pollution incident impacts. Engineered solutions (for e.g. bunds and sprinkler systems) are in place to effectively minimise the Probability and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in concrete product manufacturing such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals. These modules are common across Brickworks operations, but include site specific issues for each Plan. They are based on MSMP-MSP- ALL – 07.006 and MSMP- MSP- ALL-07.007.

The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under Brickworks National WHS management system.

Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.

3.2 Pollution Types

Austral Masonry has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types of waste which could cause potential incidents found in Prospect.

Table 1 – List of Potential Pollutants

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment)							
Site Name: Masonry					**Responsible Person:** Gavin Zovi		**Date: 30/7/15**
Name / description	**Covered under Haz Chemicals/MSDS?**	**Amount stored**	**Location of storage**	**Map reference**	**Need for early warning**[1]	**Current controls**	**See Risk Ass & PIRMP Response Action (see Below)**
CHEMICALS/FUELS/LUBRICANTS (raw materials and products which can cause pollution)							
Oils/Solvents	Class 3	Up to 5,000 L	Plant 1 (near bed polisher)	Ref # 11	N/A	• Bunding • Spill Kits • Inductions • Fire Fighting Equipment • Security • Training	Incident # 1
Diesel	Class 9	Up to 12,000 L	VAP Magnumstone area	Ref # 14	N/A	• Bunding • Spill Kits • Inductions • Fire Fighting Equipment • Security • Training	Incident # 11
Oxides	Refer to MSDS	Up to 40,000 L	P1 & P2 Oxide Tank Farms	Ref # 3 & 12	N/A	• Bunding • Spill Kits • Inductions • Training	Incident # 2, 3

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

						• Security	
Additives (Tech Dry, Quantec PL433, SikaBlock Premium)	Refer to MSDS	Up to 15,000 L	P1 & P2 Oxide Tank Farms	Ref # 3 & 12	N/A	• Bunding • Spill Kits • Inductions • Training • Security	Incident # 2, 3
MATERIALS (eg stockpiles, silos, bulk solids etc) – Vehicles used to load and move raw materials							
Sand & Aggregate Stockpiles	N/A	Variable	Dedicated on site	Ref # 2 & 7		• Maintain manageable levels • Security • Maintained Load shifting equipment • Sprinkler systems in some areas	Incident # 4
Cement	Refer to MSDS	Variable	P1 & P2 cement Silos	Ref # 4 & 10		• Bag house filters • Maintain manageable levels • High Level sensors • Security	Incident # 5, 6
Waste Stockpiles	N/A	Variable	Dedicated on site	Ref # 5 & 8		• Maintain manageable levels • Security • Sprinkler Systems • Maintained Load shifting equipment	Incident # 4
AQUEOUS (e.g. dams, wastewater tanks, other water storage areas)							
VAP Settling Pits	N/A	Variable		Ref # 1	N/A	• Ensure pumps are maintained through scheduled maintenance • Sediment levels are managed and are regularly removed off	Incident # 7

						site	
P1 Wedge Pits	N/A	Variable		Ref # 9	N/A	• Ensure pumps are maintained through scheduled maintenance • Routinely inspected for contamination • Treated prior to use in recycle water system	Incident # 7
P2 Settling Pits	N/A	Variable		Ref # 6	N/A	• Ensure pumps are maintained through scheduled maintenance • Routinely inspected for contamination. • Treated prior to use in recycle water system	Incident # 7
SUBSTANCES IN PROCESSES (substances which could be emitted from operational process i.e. treatment plants, vehicles etc)							
Name / description	**Covered under Haz Chemicals/MSDS?**	**Amount stored**	**Location of storage**	**Map reference**	**Need for early warning**[2]	**Current controls**	**See Risk Ass & PIRMP Response Action (see Below)**
Mobile Plant (onsite)	Class 3	Up to 10 MP on site	Dedicated on site	N/A	N/A	• Spill Kits • Pre start checks • PMP • Training	Incident # 8
Traffic Areas (dust, chem. leaks &loss)	Class 3	N/A	Dedicated on site	N/A	N/A	• Training • Sprinkler systems	Incident # 9

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

Hydraulic operated machinery	Class 3	Variable	Dedicated on site	N/A	N/A	• Spill Kits • Training • Inductions • Regular maintenance and inspection schedule	Incident # 10

Table 2 Reference Documents to Inventory of Pollutants

Document Name	Relation to this Plan
WHS- MSP- ALL-07.007 Hazardous Chemicals	Provides: • Key contacts regarding WH&S issues and incidents • Hazardous chemicals register • Storage and handling requirements • Plant maintenance records • Emergency procedures • Training and record keeping • Handling of hazardous materials and dangerous goods

3.3 Risk assessment and Control Measures (pre-emptive actions)

3.3.1 Identification of Risk Areas

Assessment analysis and control measures to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents:

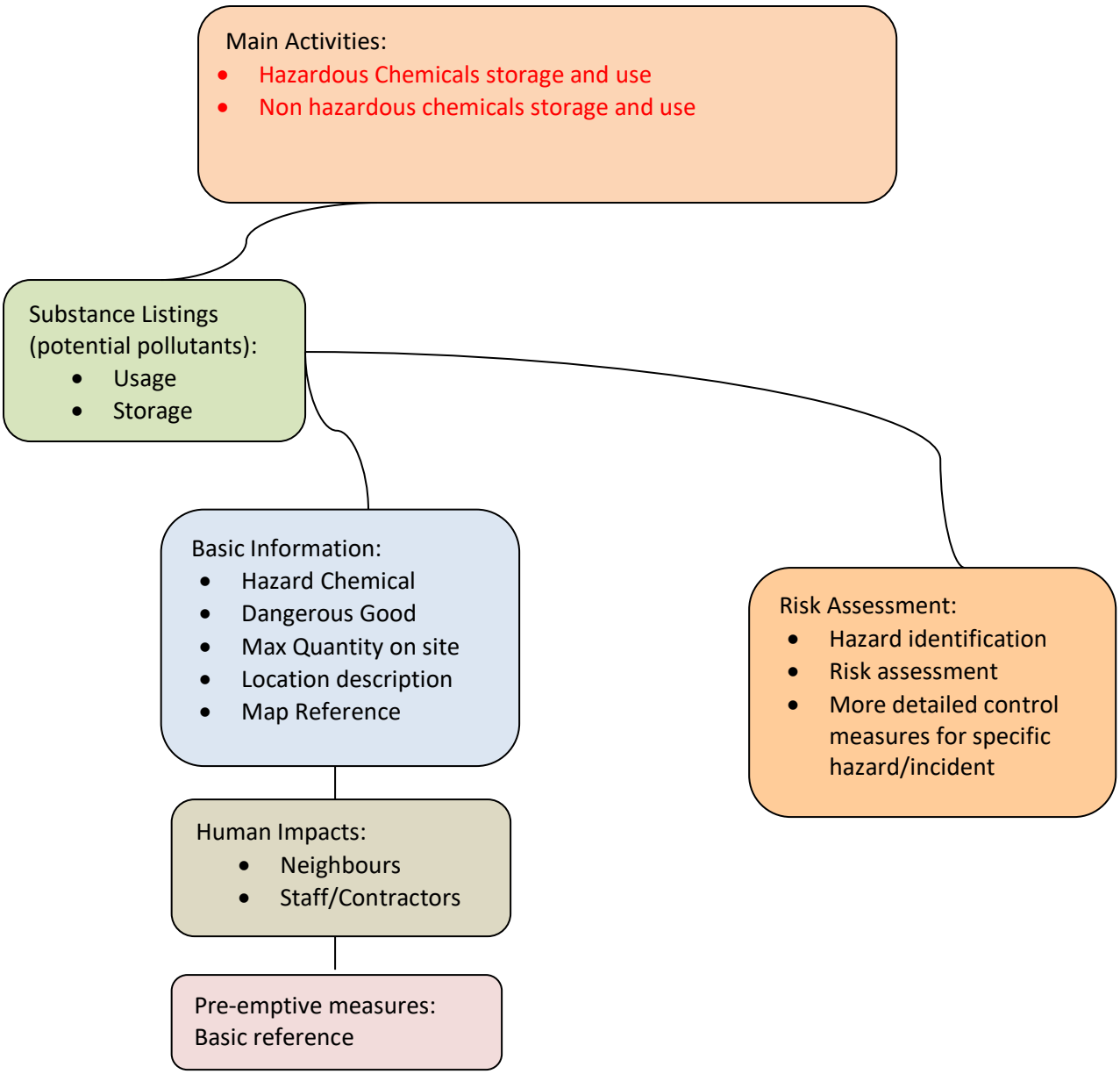
- Brickwork's National WHS management system.

Table 3 List of Documents Covering Environmental Risk Assessment and Control Measures

Document Name	Relation to this Plan
Brickwork's National WHS system	Provides: • Key contacts regarding WH&S issues and incidents • Hazardous chemicals register • Storage and handling requirements • Plant maintenance records • Emergency procedures • Training and record keeping • Handling of hazardous materials and dangerous goods • Maintenance activities • Facility management • Emergency response and incident response • Staff training and competencies
Procedures, factsheets and guides relating to PIRMP requirements	• Dangerous Goods • Incident Management • Herbicide Use • Approved Chemicals Register • Waste disposal requirements • Emergency Preparedness • Noise management • Dust management • Storm water management

3.4 Risk Modules

To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation are covered in this section. This is undertaken by a process described in the following flowchart:



In Appendix 1 Risk Assessments of each of the activities has their polluting substances listed. Each polluting substance is assessed for the requirements described in the flowchart above.

Table 4 provides a breakdown of the coverage of the regulatory requirements in the modules according to the POEO (General) Regulation 2009 by section part.

Table 4: Risk Module Coverage of the POEO (General) Regulation 2009

Section	Item heading	Covered by
98C(a)	Hazard assessment:	Hazard and Probability Risk assessment and Corrective Control Measures tables
98C(b)	Probability assessment:	Hazard and Probability Risk assessment and Corrective Control Measures tables
98C(c)	Pre-Emptive Action:	Hazard and Probability Risk assessment and Corrective Control Measures – Control measures and corrective action
98C(d)	Pollutant Inventory Types:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Name/description, Covered under Hazardous Chemicals
98C(e)	Pollutant Inventory Quantities:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Amount Stored (maximum or estimated Maximums stored)
98C(f)	Safety Equipment:	List Of Polluting Substance Storages/Uses At Site Initial Assessment- Ref to Safety Coverage
98C(i)	Early Warnings Neighbours:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Need for early warnings to neighbours
98C(j)	Staff Safety:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Ref to Safety Coverage
98C(k)	Maps location of pollutants:	List Of Polluting Substance Storages/Uses At Site Initial Assessment Location of Storage, Map reference (supports section 4 Maps)

4 MAPS

This section covers the *POEO (General) Regulation s98E (k)* requirements which are:

A detailed set of maps showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.

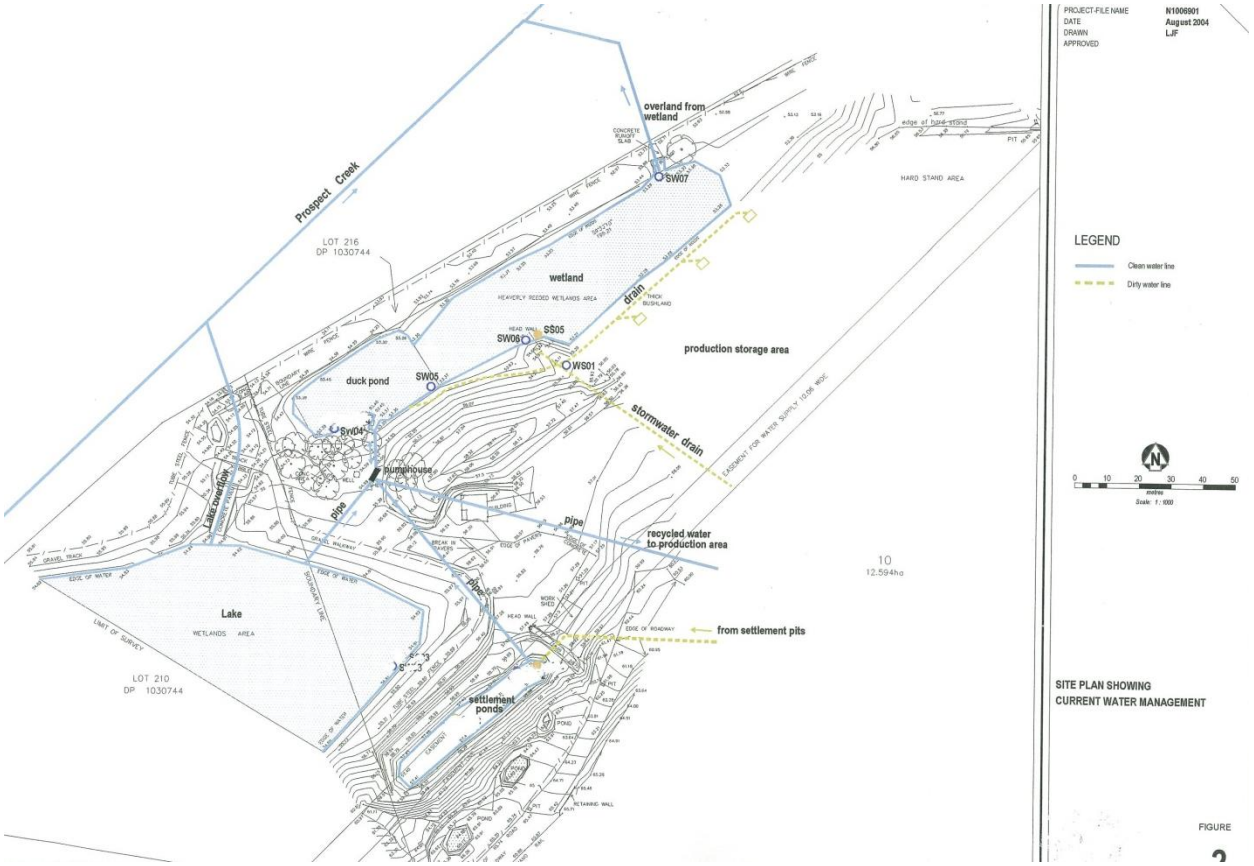
Map 4.1 shows the geographic location of Prospect and includes the requirements above.

Legend:

- Blue Rectangles: Storm water drains
- Light Blue: Direction of storm water flow

Map 4.10 Prospect Storm water Management

Map 4.11 Prospect Storm water Management



Map 4.2 shows the location of potentially affected neighbours

Neighbour Contacts for Prospect that may be affected by pollution incidents:

Yusen Logistics

Foundation Pl, Pemulwuy, NSW, 2145

Ph: 9631 4049

Shelta Australia

Unit4/ 1 Foundation Pl Pemulwuy NSW 2145

Ph: (02) 8863 0400

Hitachi Construction Machinery

Building 3, 1 Foundation Pl, Greystanes, NSW, 2145

Ph: (02) 8863 4800

The Laminex Group

2 Foundation Pl Prospect NSW 2148

Ph: 13 2136

Toll

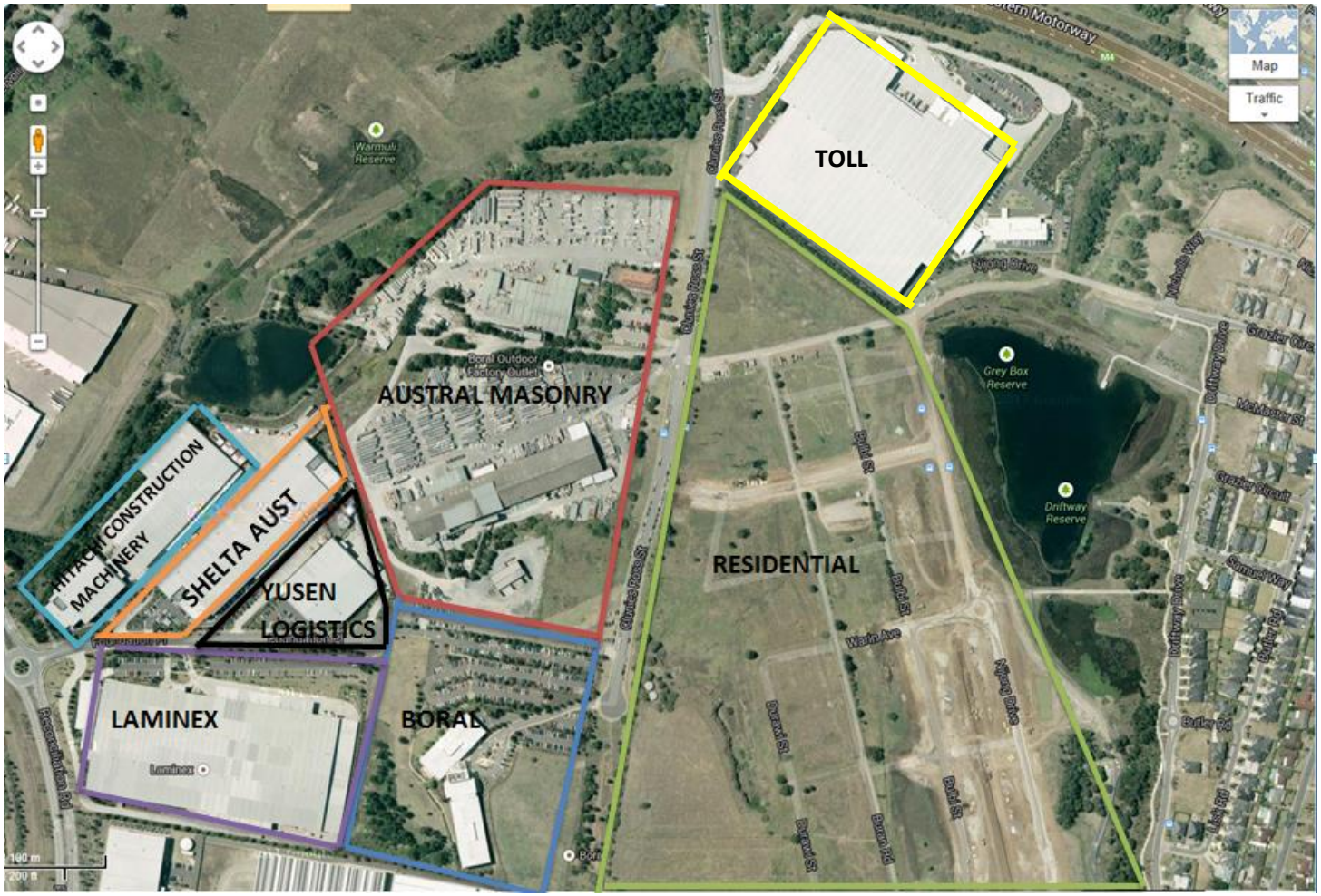
Clunies Ross St, Prospect, NSW, 2148

Ph: 1300 131 599

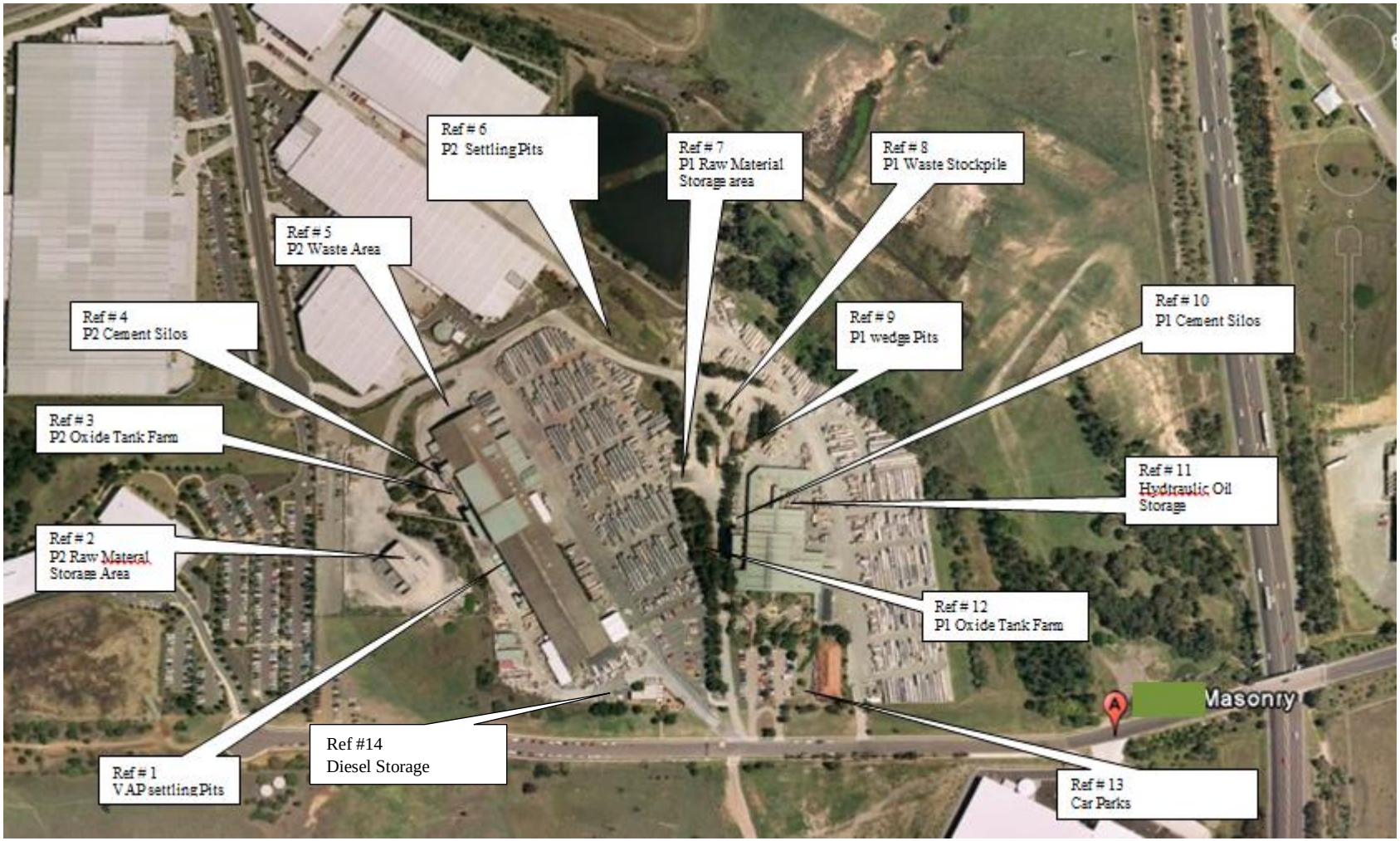
Residents

All affected residents will be notified via a door knock procedure or if not home, a letter in the mailbox.

4.2 Site map for Prospect with neighbours shown



Map 4.3: Major storage facilities at Prospect



5 EMERGENCY INCIDENT RESPONSE PROCEDURES

5.1.1 Internal communications — key names and contacts

Internal Communications are outlined in the following documents:

- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

Table: List of Key Jobs and 24 hour Contact Details

Job title	Contact Number
Plant Manager	Gavin Zovi – 0419 579 620
Maintenance Manager	Craig Haithwaite – 0427 852 949
Hess Production Manager	Mark McLeod – 0427 887 971
Prospect Environment Officer	Milena Buns – 0428 115 332
NSW State Manager	David Nugent – 0404 849 198

5.1.2 Action to be Taken Immediately after a Pollution Incident by License Holder and Occupier of the Premises

This Pollution Incident Response Management Plan must be followed immediately after a pollution incident occurs.

Also Follow:

- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

5.1.3 Procedures to be followed by the Responsible Person notifying the Pollution

Position	Responsibilities	Authorities
Plant Manager	- Obtain information required to adequately notify the environmental regulatory authority of an environmental emergency - Ensure that all persons within their respective area are trained in the requirements of this procedure.	- Contact the all regulatory authority and lodge report - Authorise written report - In environmental emergencies, ensure appropriate controls are implemented - Notify NSW State Manager
Maintenance Planner / Environment Officer	- Assisting with advice, reporting and response process; - Ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act - Assisting in the notification of pollution incidents to the relevant authorities - provision of maps associated with the plan - Assistance with the implementation of response actions to pollution incidents - Assistance in commutating with	- Obtain information from site managers, employees and witnesses. - Provide advice on controls and containment measures - Contact the regulatory authority in the event that the Manufacturing Manager is unable - Prepare follow-up written report

	neighbours and the local community about the Plan and when incidents of a certain nature occur - Ensuring that training responsible for activating about their roles in the Plan - Testing; and - Reviewing this plan.	
Employees	- To participate in any training associated with the requirements of this MSP. - Assist with implementing controls in the event of an environmental emergency	- Report incidents immediately to site managers - Provide information as required

5.1.4 Procedures to be followed for coordinating with the Authorities or Persons

This is covered under

- See section 5.4
- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

5.2 Procedure to be followed for Combating the Pollution Caused by a Spill Incident

This is covered under
- Emergency & Environmental Response Folder –

For incidents involving material harm, the fire brigade or Hazmat would combat the pollution caused by a spill incident and become the emergency controller.

Pollution incidents - Spills
A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.)

The POEO Act definition of a **pollution incident** is:

Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Clean-up Action

All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently.

POEO Act definition of **"clean-up action"**, in relation to a pollution incident, includes:

(a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
(b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
(c) preparing and carrying out a remedial plan of action.
It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

5.3 Procedure to be followed Following an Air Incident

Pollution incidents – Air Emissions

An air emission can include, smoke, dust, odour or emission of a chemical or air impurity.

5.4 External communications – government agencies and other parties

5.4.1 Co-coordinating, with the authorities

POEO Act s153C States in relation to the contents of a PIRMP:

(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.

5.4.2 Site Control – Incident Response

Emergency contact details are listed below:

Job title	Contact Number
Plant Manager	**Gavin Zovi – 0419 579 620**
Maintenance Manager	**Craig Haithwaite – 0427 852 949**
Hess Production Manager	**Mark McLeod – 0427 887 971**
Prospect Environment Officer	**Milena Buns – 0428 115 332**
NSW State Manager	**David Nugent – 0404 849 198**

Procedure for Site Control and Communications

For all emergency procedures follow:
- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

For all incidents containing spills follow
- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

Evacuation

For large dangerous incidents such as large bush fires or major flooding, the Site Controller may consider evacuation of staff to appropriate distances away from the incident.

Follow

- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006

5.5 Procedures for Notifying Pollution Incident to EPA, Local Councils or Relevant Authorities

This is covered under:

- Emergency & Environmental Response Folder - WHS-Tol-PRP-09.006
- S6.2 Website Information

6 EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

6.1 Community Communication and Consultation

Austral Masonry has and would continue to undertake community and stakeholder consultation where necessary.

Austral Bricks will continue to update the community where required.

6.2 Website information

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009 s98D:*

> *(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:*
> *(a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,*
> *(b) if the person does not have such a website--by providing a copy of the plan, without charge, to any person who makes a written request for a copy.*
> *(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:*
> *(a) section 153C (a) of the Act, and*
> *(b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).*
> .

Emergency Incident Response Procedures

Under *Part 5.7 of the POEO Act*, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions) or property damage of an amount over $10,000.

For the above pollution incidents, the Operations Manager, Gavin Zovi from Austral Masonry will be responsible for reporting to the authorities below without delay.

Relevant authorities' notification order

If there is an immediate threat to human health or the environment:

Call Fire and Rescue first	000

The Manufacturing Manager or Plant Manager will continue the next calls.

EPA	131 555
Ministry of Health (SSW Camperdown PHU)	9515 9420
WorkCover	131 050
Blacktown City Council (Plant 1)	9839 6000
- Or after hours	1300 133 491
Cumberland Council (Plant 2)	8757 9000

If there is not an immediate threat to human health or the environment:

Call EPA first	131 555
WorkCover	131 050
Ministry of Health (Westmead PHU)	9845 5555
Blacktown City Council (Plant 1)	9839 6000
- Or after hours	1300 133 491
Cumberland Council (Plant 2)	8757 9000

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process. Gavin Zovi or nominee will be responsible for coordinating the door knock.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.

6.3 Availability and Location of This Plan

The *POEO (General) Regulation 2009 s98D (1)* states:

(*1) A plan is to be made readily available:*
(a) to an authorised officer on request, and
(b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.

The availability of this Plan will be made available on the G-Drive.
Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2009 s98D (3) which States

4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

7 TRAINING – SUMMARY AND REFERENCE TO PROJECT PROCEDURE

Necessary environmental management competencies have been determined for each of the broad positions in Prospect including:

- Managers
- All other employees

Training of Prospect staff falls into several categories:

- Formal Internal Training
- Project / Site Training Information provided on site such as inductions and toolbox talks

Details of the training material to be provided in training sessions and all training records will be kept of the G-Drive.

The below information will also be included to comply with PIRMP training requirements:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents e.g. spill response procedure

8 UPDATING OF PLAN

Effective date: 15th December, 2017

Review date This Plan will be updated according to the following:

- 12 months from the last update; or alter as appropriate
- Within one month of a Category 1 Incident; or alter as appropriate
- As identified after testing of the Plan (see section 9).

9 TESTING

The POEO (General) Regulation 2009 98E states for testing of the Plan:

1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.

2) Any such test is to be carried out:
(a) routinely at least once every 12 months, and
(b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner

Testing of the Plan will be integrated into other emergency and incident testing and training programs where possible.

Initial testing of the plan will be undertaken within 6 months of the acceptance of the PIRMP. Design of the testing will be undertaken 1 month before the testing is conducted.

Records of the testing will be kept by Dean Cavill and forwarded to Gavin Zovi and Remi Baginski.

Testing dates This Plan will be tested according to the following:

- 12 months from the last test, or
- Design of the testing method will be 1 month before the initial test date
- Or before one month after a reportable incident.

Recording of Testing

A detailed record of the testing of the Plan will be prepared after each testing of the plan is undertaken. If the test identifies any shortcomings in the Plan, especially the implementation of the spill response procedures, the Plan will be corrected or appropriate non-conformance actions will be undertaken.

10 IMPLEMENTATION OF THE PLAN

The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs.
$2 million maximum fines apply for failing to implement the Plan.

Hence if a pollution incident occurs:

- It must be responded to according to this Plan and its reference documents.
- An incident response report/audit must be completed

11 APPENDIX 1 - RISK MODULES

This Plan uses a risk assessment process to demonstrate the existing risk control methods are effective in preventing and minimising environmental harm from pollution incidents. If unacceptable risks are identified new control measures will be introduced. The modular format permits the use of common activities associated with concrete product manufacturing to be used in future PIRMP documents. The modules used for this Plan for the Prospect site include:

- Hazardous chemicals
- Non Hazardous materials
- Aqueous management

Each module lists the type of use or storage for the pollutant/s being considered.
Each of the above is considered for a range of hazards and their control method considered. Also considered in the above process is:

- Impact on neighbours
- Safety
- Location
- If the pollutant is a hazardous chemical

Risk Matrix

Environmental risks associated with Prospect and its contractor's activities use the following table A.

Table A: Austral Bricks risk matrix

Risk Calculator including current controls	**Consequence (C)** Severity of injury / illness		**Exposure (E)** (Freq & Duration)		**Probability** (Probability of E + C)	
	Minor	1	Rare	1	One in a million	1
	Temporary Incapacity	3	Weekly	2	Remote	2
	Permanent Incapacity	7	Daily	3	Unexpected	3
	Fatality	17	Hourly	5	Likely	8
			Constant	10	Imminent	16

Please consider:	-	Results of relevant atmospheric monitoring	-	Safe handling considerations
	-	Results of relevant health surveillance	-	Spill disposal methods
	-	Known incidents associated with chemical	-	MSDS recommendations
	-	Are storage requirements satisfactory?	-	Fire fighting equipment available

Risk Priority = E **x** P **X** C **=** If risk score exceeds **279** the Manufacturing Manager must be informed immediately

The hazards, Probability and pre-emptive measures assessments which follow use table A in assessing the environmental risks associated with the hazards identified.

Prospect - Hazard and Probability Assessment and Corrective Control Measures

Name of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Exposure	Probability	Risk	Impact on neighbours[3]	Control Measures Corrective Action Coverage under other Plans	Responsible person
Oils/ Solvents	**Incident #1** Loss of oils solvents inside bund during delivery and or use	1	2	3	6	N	Consequence (Minor): Failure resulting in loss of oils/solvents from tank would be captured entirely by existing primary bund with no release to soil or water. Exposure (Weekly): Oils and solvents are delivered weekly. Probability (Unexpected): Due to location within the bund, spillage during delivery and use is unexpected to occur. In addition hoses and decanting equipment are maintained in good structural integrity with low risk of failure.	As per PIRMP action plan
Oxides / Additives	**Incident # 2** Loss of liquid oxides and/or additives inside bund during delivery and or use	1	2	3	6	N	Consequence (Minor): Failure resulting in loss of oxides from tank and delivery process would be captured entirely by existing primary bund with no release to soil or water. Exposure (Weekly): Oxides are delivered several times a week. Probability (Unexpected): Spillage during delivery and use within the bund is unexpected to occur. Stock levels are checked routinely to minimise the chance of overflow, if it does overflow would be captured in either the P1 wedge pits or the P2 pits and not released from site.	As per PIRMP action plan
	Incident #3 Loss of liquid oxide and/or additives outside of bund during delivery	3	2	3	18	N	Consequence (Temporary Incapacity): Failure resulting in loss of oxides from the delivery process would be captured by spill management techniques. It is only a possible scenario during delivery when there is an attendant present, who would immediately inform staff.	As per PIRMP action plan

[3] If the incident may impact on neighbours then it will need to trigger the early warnings assessment and actions

							Exposure (Weekly): Oxides are delivered several times a week. Probability (Unexpected): Due to training and SOPs spillage during delivery outside of the bund is unexpected to occur. In addition hoses and other unloading equipment are maintained in good structural integrity with low risk of failure. Spills kits also are maintained and available in various areas.	
Raw Material Areas & Waste Stockpiles	**Incident # 4** Dust emissions from stockpiles	3	3	3	27	Y	Consequence (Temporary Incapacity): Dust created from adverse weather conditions from stock piles and/or from loading of waste. Exposure (Daily): Stockpiles of raw material are continuously stored on site. Probability (Unexpected): Raw materials being stored within bins fitted with sprinkler systems and wind breaks. Materials are managed such that stockpiles are not stored outside of the designated areas. Also unexpected due to sprinkler systems fitted above the waste stockpiles prior to loading waste is wetted to minimise dust. Automatic sprinkler systems ate in some areas, site is swept fortnightly	As per PIRMP action plan
Cement Silos	**Incident # 5** Overflow of cement silos during delivery	3	3	2	12	N	Consequence (Temporary Incapacity): Overflow of cement silos during delivery. Exposure (Daily): Cement is delivered several times a day. Probability: (Remote): All cement silos are fitted with high level sensors once activated it turns off the inlet valve stopping more cement being loaded. The cement silos also have bag house filters fitted to them which are routinely inspected and maintained.	As per PIRMP action plan
	Incident # 6 Over pressurising of cement silos during	3	3	2	12	N	Consequence (Moderate): Over pressurising of cement silos during delivery.	

	delivery						Exposure (Daily): Cement is delivered several times a day. Probability (Remote): The cement silos also have bag house filters fitted to them which are routinely inspected and maintained, overflow pipes and pressure relief valves fitted to top of tank.	
VAP Settling Pits	**Incident # 7** Overflow of VAP, P1 wedge and P2 settling pits	3	2	3	18	N	Consequence (Temporary Incapacity): Overflow of pits into stormwater system. Exposure (Weekly): There are several pits in use on site. Probability (Unexpected): Overflow of pits would be unexpected due to daily checks, regular maintenance of pumps and routine inspections. Sediment levels are managed and are regularly removed off site **Note:** For PIRMP purposes overflow events during extreme wet weather will be reported under POEO Licence obligations and not Immediate Reporting.	
Mobile Plant	**Incident # 8** Mobile plant, hydraulic hose or fuel tank failure	1	5	3	15	N	Consequence (Minor): Failure from fuel tank or hydraulic hoses would be maintain to a small localised area on site. Exposure (Hourly): Mobile plant is used constantly on site. Probability (Unexpected): Hose or fuel tank failure from mobile plant would be minimal as prestart and regular maintenance programs are in place to capture and prevent such occurrences. Spills kits also are maintained and available in various areas.	As per PIRMP action plan
Traffic areas (dust)	**Incident # 9** Surface dust from mobile plant	1	5	3	15	Y	Consequence (Minor): Dust created from continuous mobile plant operations across site Exposure (Hourly): Mobile plant is used constantly on site. Probability (Unexpected): Main areas watered with sprinkler systems in high wind conditions	As per PIRMP action plan
Hydraulic Operated Machinery	**Incident # 10** Hydraulic hose failure for operating	1	5	3	15	N	Consequence (Minor): Hydraulic leak from machinery operated.	As per PIRMP action

	machinery						Exposure (Hourly): Hydraulic equipment runs constantly on site. Probability (Unexpected): All equipment is regularly maintained and inspected, hoses are replaced on a routine basis	plan
Diesel Storage	**Incident #11** Spill during filling of forklifts or delivery of diesel	3	3	2	18	N	Consequence (Temporary Incapacity): Spill of diesel onto hardstand Exposure (Daily): Forklifts are filled daily. Probability (Remote): Bowser automatically turns off once high level in the tank is reached.	As per PIRMP action plan

Incident No 1

Incident No 1	Loss of oil/solvents inside bunded area Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bunds are capturing full volume of oil/solvents • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination. • Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Gavin Zovi)
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of oils/ solvents and advise on required clean-up.

Incident No 2

Incident No 2	Loss of oxides and/or additives contained within bunded area Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bunds are capturing full volume of oil/solvents • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact service provider (Lanxess (02) 8748 3911) to pump-out bund contents • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination. • Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Gavin Zovi)
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of oxides and advise on required clean-up.

Incident No 3

Incident No 3	Loss of oxides and/or additives outside of bunded area Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Immediately place sand from stockpile area to absorb spill contents using front end loader. • Clear and remove all contaminated sand from area • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • If any release onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination.
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Gavin Zovi)
Scale of incident	Incident would be restricted to immediate area with minimal external impact. However, potential for overflow or failure may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Contaminated sand to be placed on waste stockpiles for recycling.

Incident No 4

Incident No 6	Dust emissions from raw material and waste stockpiles Actions Required: • Employees, Contractor/Visitor to notify site representative of issue immediately. (Induction) • Daily monitoring to be undertaken to capture weather and site conditions • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Dust suppression activity to commence immediately including turning sprinkler systems on where applicable. • Automated sprinkler systems in some areas
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Site operations manager to instruct site personnel (Gavin Zovi)
Scale of incident	Incident would be localised to the area with some external impact.
Evacuate	N/A
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used if required
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	N/A

Incident No 5

Incident No 5	Overflow of cement silos Actions Required: • Employees, Contractor/Visitor to notify site representative of issue immediately. (induction) • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Root cause to be investigated, then error proofed such that the incident can not be repeated (above scenario requires high level probe to fail which is unlikely).
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Site operations manager to instruct site personnel (Gavin Zovi)
Scale of incident	Incident would be localised to the area with some external impact.
Evacuate	No.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used if required
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	N/A

Incident No 6

Incident No 6	Over pressurising of cement silos Actions Required: • Employees, Contractor/Visitor to notify site representative of issue immediately. (induction) • Daily monitoring to be undertaken to capture weather and site conditions • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Dust suppression activity to commence immediately.
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Site operations manager to instruct site personnel (Gavin Zovi)
Scale of incident	Incident would be localized to the area with some external impact.
Evacuate	No.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used if required
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	N/A

Incident No 7

Incident No 7	Overflow of settling pits Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Contact local neighbours if going to be in inundated by rise of water • Area to be restricted to Incident Response Personnel • If any release from site onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination.
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi(reporting to David Nugent) • Call service provider • Periodic inspections and update reporting of site (Gavin Zovi)
Scale of incident	Overflow of settling pits are likely to result in off-site impacts to water courses which would predominantly reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be significant.
Evacuate	N/A
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Consultants to be contacted to advise on required clean-up.

Incident No 8

Incident No 8	Mobile plant, hydraulic hose or fuel tank failure Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from mobile plant & equipment • If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately • Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (operator)
Scale of incident	Incident would be localized to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of hydrocarbon and advise on required clean-up.

Incident No 9

Incident No 13	Dust from traffic areas Actions Required: • Employees, Contractor/Visitor to notify site representative of issue immediately. (induction) • Daily monitoring to be undertaken to capture weather and site conditions • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Dust suppression activity to commence immediately.
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi(reporting to David Nugent) • Site operations manager to instruct site personnel
Scale of incident	Incident would be localised to the area with no external impact.
Evacuate	No.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used if required
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	N/A

Incident No 10

Incident No 10	Plant hydraulic hose failure Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from mobile plant & equipment • If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately • Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (operator)
Scale of incident	Incident would be localised to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept. as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.

Incident No 11

Incident No 11	Diesel spill due to filling of forklifts or tank Actions Required: • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from mobile plant & equipment • If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately • Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	• Gavin Zovi (reporting to David Nugent) • Call service provider (Gavin Zovi) • Spill Kit manager (operator)
Scale of incident	Incident would be localised to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Plant Manager and any advice provided by Fire Dept. as part of attendance after immediate notification.
Communications	Internal: • Plant Manager External mandatory: • Immediate Reporting Contact Sheet to be used
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.

Chemical Handling and Storages Risk Module 2

Purpose

The activities associated with this module generally relates to chemical handling and storages as classified as hazardous chemicals under the WHS Regulation 2011 but can include other non-aqueous liquid chemicals used at the site.

Activities

Use of chemicals on site is limited to:

- Petroleum products - fuels, lubricants, hydraulic oils, bitumen, cutting oils and chemicals, paint solvents, etc. Largely class 3 flammable or combustible liquid classification
- Liquid oxides -
- Other chemicals stored in smaller quantities in groups

This risk module describes the main hazards to the environment associated with chemical use and storage. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in *RMS Environmental Incident Classification and Reporting Procedure*. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 6 of this document are to be initiated.

Further details on the risk assessment and appropriate control methods can be found in the following documents:

- WHS Management System
- Chemical Register and Manifest for each site
    - WHS-Frm_All-07.007

The register has been written to cover general environmental hazards and their controls.

11 APPENDIX 2 – REGULATORY REQUIREMENTS

PIRMP Legislation

POEO Act Part 5.7

153A

Duty of licence holder to prepare pollution incident response management plan
The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

153C

Information to be included in plan
A pollution incident response management plan must be in the form required by the regulations and must include the following:

(a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:
(i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
(ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
(iii) any persons or authorities required to be notified by Part 5.7,
(b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,
(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,
(d) any other matter required by the regulations.

153D

Keeping of plan
A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.

153E

Testing of plan
A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.

153F

Implementation of plan
If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.

POEO (General) Regulation 2009

98C(a) **Hazards:**
A description of the hazards to human health or the environment associated with the activity to which the licence relates

98C(b) **Probability:**
the Probability of any such hazards occurring, including details of any conditions or events that could, or would, increase that Probability,

98C(c) **Pre-Emptive Action:**
details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,

	Pollutant Inventory Types:
98C(d)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,
	Pollutant Inventory Quantities:
98C(e)	the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,
	Safety Equipment:
98C(f)	a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,
	Staff Contacts:
98C(g)	the names, positions and 24-hour contact details of those key individuals who: are responsible for activating the plan, and are authorised to notify relevant authorities under section 148 of the Act, and are responsible for managing the response to a pollution incident,
98C(h)	**Authority Contact:** the contact details of each relevant authority referred to in section 148 of the Act,
	Early Warnings Neighbours:
98C(i)	details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,
	Staff Safety:
98C(j)	the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,
	Maps:
98C(k)	a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,
	Early Warnings General:
98C(l)	a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,
98C(m)	**Training of Staff:** the nature and objectives of any staff training program in relation to the plan,
	Timing of Testing:
98C(n)	The dates on which the plan has been tested and the name of the person who carried out the test,
98C(o)	**Updating of Plan:** the dates on which the plan is updated,
98C(p)	**Plan Testing** the manner in which the plan is to be tested and maintained.
	Availability of plan:
98D(1)	(1) A plan is to be made readily available: (a) to an authorised officer on request, and (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.
	Publishing Plan Parts:
98D(2)	(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: (a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, (b) if the person does not have such a website--by providing a copy of the plan, without charge, to any person who makes a written request for a copy.
	Procedures under Act:
98D(3)	3) Subclause (2) applies only in relation to that part of a plan that includes the information required under: (a) section 153C(a) of the Act, and (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).

98D(4)	**Privacy Protection:** (4) Any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998* is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).
98E(1)	**Testing of the Plan** - 1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.
98E(2)	**Minimum Testing:** 2) Any such test is to be carried out: (a) routinely at least once every 12 months, and (b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner