

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

**For *AUSTRAL PRECAST PTY LTD*
*WETHERILL PARK NSW (EPL 13394)***

Pollution Incident Response Management Plan for Austral Precast NSW

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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 Wetherill Park site with the Environmental Protection License of 13394.

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, likelihood 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 Wetherill Park site is licensed to Austral Precast Pty Ltd which is part of the Brickworks Limited group of companies.

This site is covered by an Environment Protection Licence (EPL) number 13394 for the scheduled activities of concrete works.

The site has an overarching environmental management system supported by the AS/NZS ISO 14001 Environment Management Systems Requirements.

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 Wetherill Park site has one plant that holds the EPL number of 13394. This Plant is located at 33-41 Cowpasture Road, Wetherill Park. 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 Wetherill Park 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 Wetherill Park. 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.

The Workplace Health and Safety Officer, Brett Teale is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

Additional Information

Contact: Brett Teale 0427 383 772

Effective date: 22st March 2016

Review date: See Updating of Plan

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). Wetherill Park operates under EPL no. 13394 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)	Likelihood 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, LIKELIHOOD 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, likelihood 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 Wetherill Park site undertakes activities of concrete works.

The most likely environmental emergencies that may be encountered at the Wetherill Park site include:

- Water pollution with slurries, solvents or other chemicals. The sources may include but are not limited to:
 - IBCs containing liquid chemicals and waste slurries.
 - Concrete washings, concrete effluent, concrete waste material
- Gas leak and/or fire. The sources may include but are not limited to:
 - Gas tanks.
- Air pollution from unusual dust emission. The sources may include but are not limited to:
 - Raw Materials delivery to site.

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood 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 works such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals. These modules are based on WHS- 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

Concrete works by its nature 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 Wetherill Park.

Concrete Wastes, Washings, and Effluents: Recycled water reclaimer checked and monitored by daily shift supervisors and maintenance personnel. May be pumped by maintenance crew with records to be sent to the Site Manager and WHS Officer. Solid waste is collected and recycled by Licenced waste management.

Waste Oil: All Waste Oil generated shall be stored in drums in the oil store / bunded area.

Oil /Water emulsions: The Maintenance Supervisor shall, as required, organise the pump out of oily water mixtures. The Maintenance Supervisor shall ensure that records of the pump out are sent to the Site Manager and WHS Officer.

Wash down Water: The water is collected in plastic drums and pits. The Production Manager and/or Maintenance Supervisor shall organise the removal once the pits and drums are full.

Sewerage Waste: The sewerage systems discharge the treated water through the sewerage pipes. The Maintenance Supervisor will organise for blockages to be cleared by a licenced plumber and records sent to the Plant Manager and WHS Officer.

Table 2: List of Typical Main Pollutants in ceramic works

Description	Comments
Air Based Emissions	
- Air Based Emission Incidents ENV-MSP-AII-09.014	
Dust	From concrete panel manufacture. Dust is covered under the EMS in Env- MSP- ALL- 07.003.
Fire	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under the Emergency Procedures Env-MSP-ALL-07.012 and WHS-Man-AII-09. Protocol to notify neighbours Env-MSP-AII- 09.020
Noise	Emitted by plant and equipment. Covered in the EMS under Noise control and monitoring Env-MSP.ALL-07.004. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour is generally not associated with this site.

Spill type emissions	
Class 3 flammable liquids e.g. Fuels including petrol based fuels and	For plant and equipment operations. Covered under: <ul style="list-style-type: none"> • Env- MSP-ALL-07.0.14 Hydrocarbons • Env-MSP-All-9.013 Spill Incident
Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations. Covered under <ul style="list-style-type: none"> • Env- MSP-ALL-07-0.14 Hydrocarbons • WHS- MSP- ALL-07.007 Hazardous Chemicals
Other dangerous Goods classes e.g. <ul style="list-style-type: none"> • Compressed gases • Corrosive substances • Oxidizing substances • Toxics • Other dangerous goods 	Use of other dangerous goods varies on site. Covered under <ul style="list-style-type: none"> • WHS- MSP- ALL-07.007 Hazardous Chemicals
Pesticides	Control of weeds and pests: Covered under <ul style="list-style-type: none"> • Env – MSP- ALL- 07.005 Weed Management
Wastes	Storage of wastes and wastes containing chemicals: Covered under: <ul style="list-style-type: none"> • Env – MSP- ALL- 07.007 Solid and Liquid Waste • Env – MSP- ALL- 07.0016 Disposal of materials and substances

3.2.1 Use and Storage of Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous Chemicals — covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances

Hazardous chemicals are documented and itemized in accordance to the Workplace Health and Safety Regulation 2011. The specific hazardous and non-hazardous chemicals documents are identified in Table 3:

Table 3 Reference Documents to Inventory of Pollutants

Document Name	Relation to this Plan
WHS- MSP- ALL-07.007 Hazardous Chemicals	Provides: <ul style="list-style-type: none"> • Key contacts regarding OH&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
WHS-MSP-All-07.005 Env – MSP- ALL- 07.0016 Disposal of Materials and Substances	

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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:

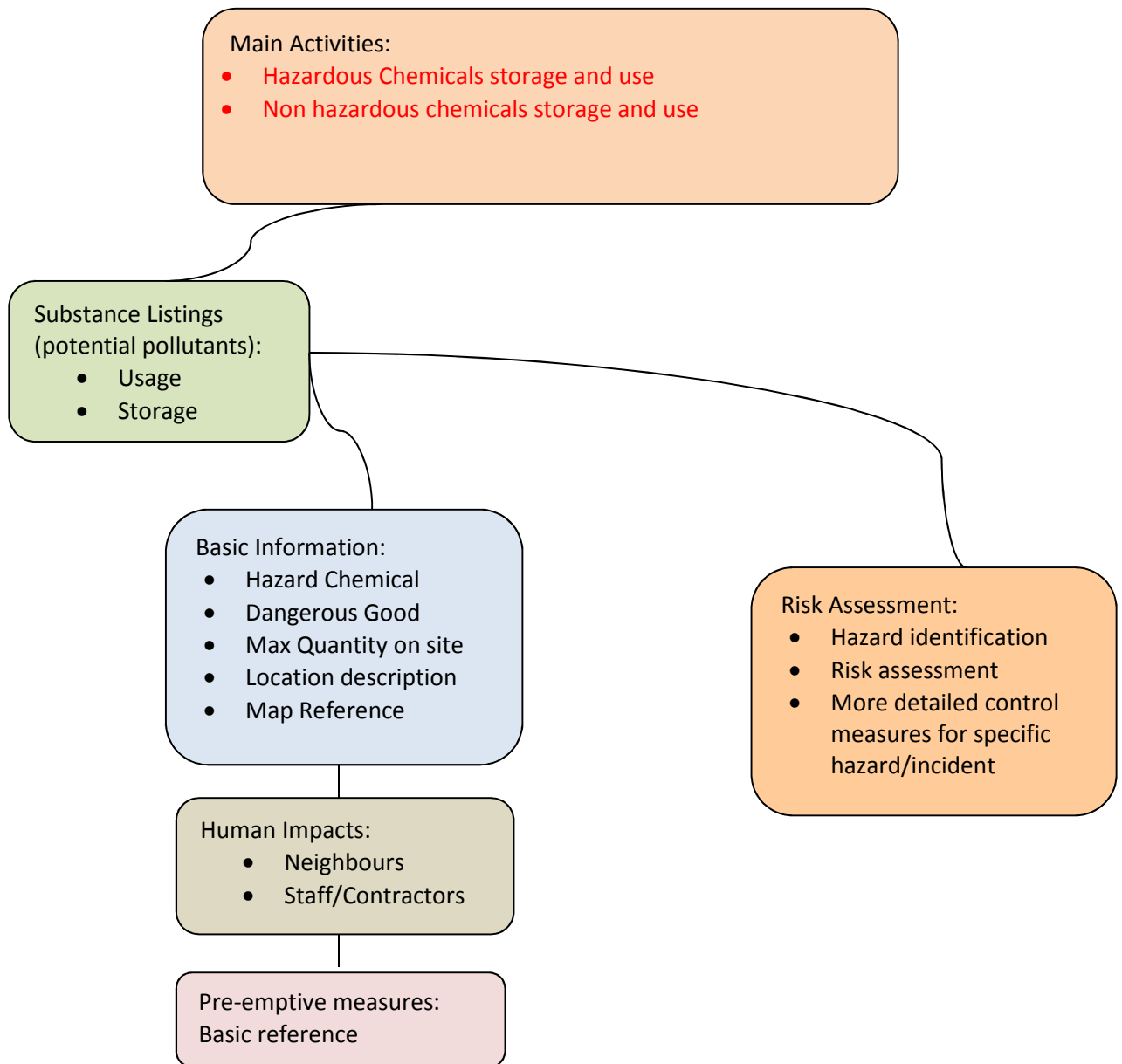
- Austral Bricks Environmental Management System
- Brickwork's National WHS system

Table 4 List of Documents Covering Environmental Risk Assessment and Control Measures

Document Name	Relation to this Plan
Brickwork's National WHS system	Provides: <ul style="list-style-type: none"> • 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
Austral Bricks Environmental Management System	Provides in relation to PIRMP requirements: <ul style="list-style-type: none"> • Internal auditing of sites and Requires sites to undertake or implement: <ul style="list-style-type: none"> • Aspects and Impacts assessment • Construction activities • Maintenance activities • Facility management • Emergency response and incident response • Staff training and competencies
Procedures, factsheets and guides relating to PIRMP requirements	<ul style="list-style-type: none"> • 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 Assessment, each of the activities has their polluting substances listed. Each polluting substance is assessed for the requirements described in the flowchart above.

Table 5 provides a breakdown of the coverage of the regulatory requirements in the modules according to the POEO (General) Regulation 2009 by section part.

Table 5: Risk Module Coverage of the POEO (General) Regulation 2009

Section	Item heading	Covered by
98C(a)	Hazard assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(b)	Likelihood assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(c)	Pre-Emptive Action:	Hazard and Likelihood 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.

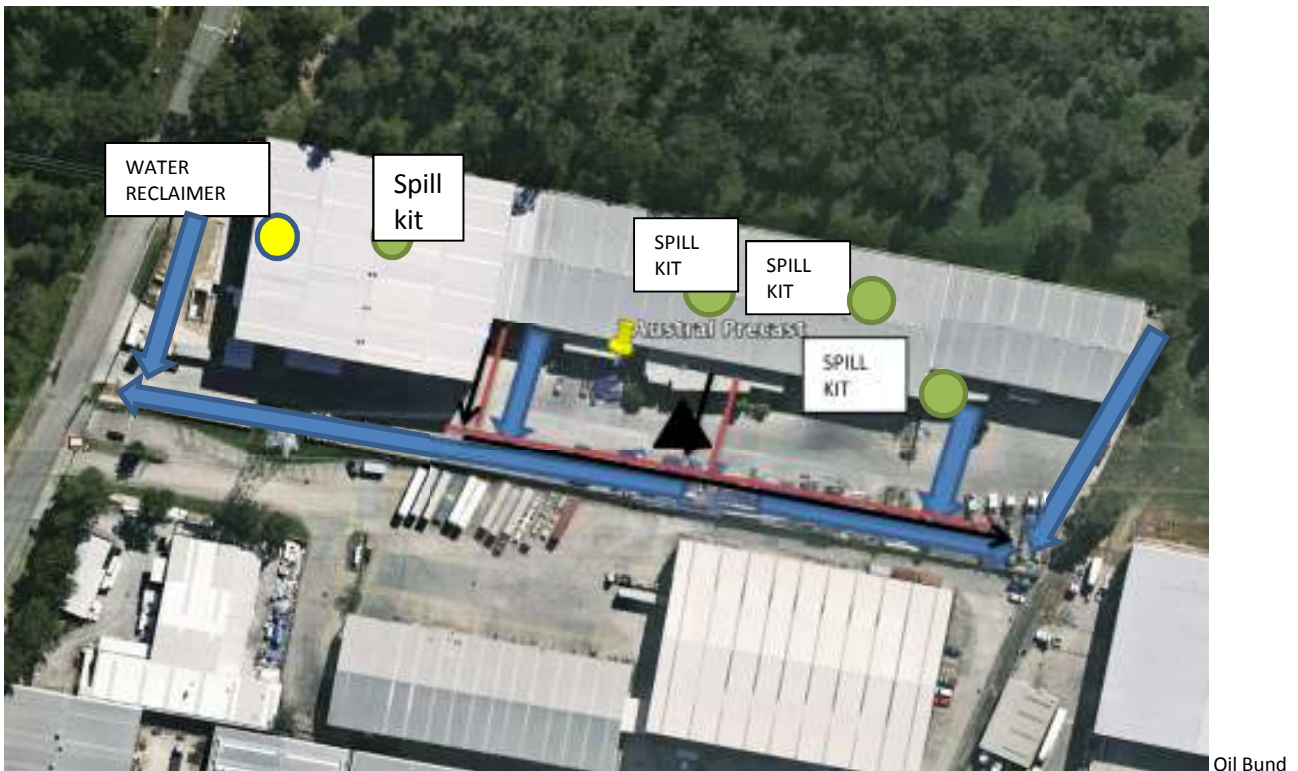
Map 4.1 shows the geographic location of Wetherill Park and includes the requirements above.

Legend:

- Light Blue: Direction of storm water flow
- Red/Black Arrows: Position/Direction of Drains and Pipelines
- Yellow: recycled water storage
- Green: Spill Kits
- Black: Oil Bund

Wetherill Park Plant: Storm water Management, Storage Facilities and Spill Kit Locations

MAP 4.1



Map Not to Scale.

Map 4.2 shows the location of potentially affected neighbours

Neighbour Contacts for Wetherill Park Plant that may be affected by water or air emission incidents:
Shaw's Darwin Transport

43-49 Cowpasture Road
Wetherill Park NSW 2164
Phone: 9756 1877

Prospect Water Filtration Plant
Sydney Water
Phone: 9800 6935

Austec Panel Systems Pty Ltd
51-57 Cowpasture Road
Wetherill Park NSW 2164
Phone: 9756 4334

Don Watson Warehousing
213-217 Newton Road
Wetherill Park NSW 2164
Phone Direct: 8787 9191
Phone: Head Office (03) 5367 6655

Site map for Wetherill Park – potentially affected neighbours.

MAP 4.2



Map Not to Scale.

5 EMERGENCY INCIDENT RESPONSE PROCEDURES

5.1.1 Internal communications — key names and contacts

Internal Communications are outlined in the following documents:

- Emergency Response and Notification- ENV-AII-09-012

Table: List of Key Jobs and 24 hour Contact Details

Job title	Contact Number
State Manager	Daniel Coutts – 0418 220 356
Plant Manager	Matthew Murray – 0409 829 141
WHS Officer	Brett Teale – 0427 383 772

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:

- Spill Incident ENV-AII-09-013
- Emergency Response and Notification- ENV-AII-09-012

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

Position	Responsibilities	Authorities
Site Manager	<ul style="list-style-type: none"> - Obtain information required to adequately notify the environmental regulatory authority of an environmental emergency 	<ul style="list-style-type: none"> - Contact the all regulatory authority and lodge report - Authorise written report
WHS Officer	<ul style="list-style-type: none"> - 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 communicating with neighbours and the local community about the Plan and when incidents of a certain nature occur 	<ul style="list-style-type: none"> - Obtain information from site managers, employees and witnesses. - Provide advice on controls and containment measures - Contact the regulatory authority in the event that the Site Manager is unable - Prepare follow-up written report

	- Ensuring that training responsible for activating about their roles in the Plan - Testing; and - Reviewing this plan.	
Plant Manager	- Ensure that all persons within their respective area are trained in the requirements of this procedure.	- In environmental emergencies, ensure appropriate controls are implemented - Notify Site Manager
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 Response and Notification- ENV-AII-09-012

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

This is covered under

- Spill Incident- ENV-AII-09.013
- Emergency response Plan – ENV- MSP- 07.012

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.

Follow MSP Air Based Emission Incidents ENV-MSP-AII-09.014 part of Austral Bricks EMS.

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
State Manager	Daniel Coutts – 0409 983 717
Plant Manager	Matthew Murray – 0409 829 141
WHS Officer	Brett Teale – 0427 383 772
Environmental Complaints	9604 9444

Procedure for Site Control and Communications

For all emergency procedures follow:

- Emergency Preparedness and Response ~ WHS-Man-All-09

For all incidents containing spills follow

- Spill Incident ~ ENV- MSP-All-09.013

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

- Evacuation Plan ~ WHS-SOP-WP1-07.035
- Emergency Response Folder ~ WHS-Tol-WP1-09.005

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

This is covered under:

- Emergency Response and Notification ~ ENV-All-09-012
- S6.2 Website Information

6 EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

6.1 Community Communication and Consultation

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

Austral Precast will continue to update the community where required as outlined in the ENV-MSP-All- 07.020.

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).

Below is a recommended layout of what should be published on the Austral Precast website with a link to it in a prominent position.

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 Plant Manager, Matthew Murray from Austral Precast 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 Site Manager, WHS Officer or Plant Manager will continue the next calls.

EPA	131 555
Ministry of Health (SSW Camperdown PHU)	9515 9420
Safe Work NSW	131 050
Local Authority (Fairfield City Council)	9725 0222

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

Call EPA first	131 555
Safe Work NSW	131 050
Ministry of Health (SSW Camperdown PHU)	9515 9420
Local Authority (Fairfield City Council)	9725 0222
Fire and Rescue NSW (Pollution incident notification hotline)	1300 729 579

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. Matthew Murray or nominee will be responsible for coordinating the door knock.

To Notify Neighbours follow procedure:

- ENV-MSP-All-09.015

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:*

- To an authorised officer on request, and*
- 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 Wetherill Park including:

- Managers
- All other employees

Training of Wetherill Park 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 neighbors where appropriate
- Specific procedures in dealing with potential pollution incidents e.g. spill response procedure

8 UPDATING OF PLAN

Effective date: 22nd June 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 8).

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 Brett Teale and forwarded to Matthew Murray.

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

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 ceramic works to be used in future PIRMP documents. The modules used for this Plan for the Wetherill Park 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 Wetherill Park and its contractor’s activities use the following table A.

Table A: Austral Precast risk matrix

Risk Calculator including current controls	Consequence (C)		Exposure (E)		Probability	
	Severity of injury / illness		(Freq & Duration)		(Likelihood 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 = x x =

If risk score exceeds 279 the Manufacturing Manager must be informed immediately

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

Aqueous Based Management Risk Module 1 –

Purpose

The activities associated with this module are related only to aqueous based materials, generally water and wastewater management.

Activities

Aqueous management involves:

- waste water surface washing, washing vehicles and plant and any other activities which add pollutants to water;
- prevention of mud and litter being deposited on trafficked roadways;
- maintenance and cleaning of sediment control works;
- protection of soil and other stockpiles from erosion by rain entering waterways
- extraction of water
- excavation in waterways
- management of any dams and holding ponds including measures for flocculation and dewatering

This risk module describes the main hazards to human health or the environment associated with aqueous management. 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 per Emergency Response and Notification ~ ENV-AII-09-012. 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:

- Chemical Register and Manifest WHS- Frm-AII-07.007

The module has been written to cover general environmental hazards and their controls. As the site environmental management system is fluid, new documentation may better reflect the risks and controls. .

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Aqueous Management [Example of potential pollutants]								
Site Name: Wetherill Park					Responsible person: Matthew Murray (Plant Manager, Austral Precast)		Date: 09/06/2016	
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning¹	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
MATERIALS (e.g. stockpiles, silos, bulk solids etc.)								
sediment entering waterways	no	variable	variable	variable	Only in extreme cases where sediment threatens to impact on health of waterway	Ground opening procedure Sediment basin management procedure	List relevant safety procedures if different from environment	See items 1. 2. And 3.
AQUEOUS (e.g. dams, wastewater tanks, other water storage area)								
waste water discharge off site	Only if it contains a hazardous chemical spill	variable	variable	variable	Only in extreme cases where spills threaten to impact on health of waterway	Water use procedure Site cleaning procedure Spill response procedure	List relevant safety procedures if different from environment	See items 1. 2. And 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.

Hazard and Likelihood Risk assessment and Corrective Control Measures – Soil and Water Management Wetherill Park									
Site Name: Wetherill Park					Responsible person: Matthew Murray Plant Manager Austral Precast			risk assessment date: 13/07/15	
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Exposure	Probability	Risk Assess	Impact on neighbours	Control Measures Corrective Action	Responsible Person/s	
Wastewater discharge off site from sediment basins	Water discharged not complying to EPA limits and breach of EPA licence	3	1	3	9	Unlikely but possible	<ol style="list-style-type: none"> 1. Staff induction and training 2. Environment Incident procedure 	Daniel Coutts, Matthew Murray, Brett Teale	
	Insufficient oil/grease removal leading to breach of EPA licence condition of no visible oil/grease	3	1	3	9	Unlikely but possible	<ol style="list-style-type: none"> 1. Spills procedure 2. Staff induction and training 3. Environment Incident procedure 	Daniel Coutts, Matthew Murray, Brett Teale	
	Failure of erosion or sediment controls causing sediment laden material to leave site	3	1	3	9	Unlikely but possible	<ol style="list-style-type: none"> 1. Regular inspections 2. Staff induction and training 3. Environmental Management of Construction site dewatering 1. Environment Incident procedure 	Daniel Coutts, Matthew Murray, Brett Teale	
Untreated run off	Failure of erosion or sediment controls but run off remains on site	1	1	3	3	No	<ol style="list-style-type: none"> 1. Regular inspections 2. Staff induction and training 3. Environmental Management of Construction site dewatering 4. Environment Incident procedure 	Daniel Coutts, Matthew Murray, Brett Teale	
Rubbish and other	Improper disposal of waste material found in soil, causing contamination of land or water	1	1	2	2	Unlikely but possible	<ol style="list-style-type: none"> 1. Contractor to remove and dispose in accordance with council regulations 2. Staff induction and training 3. Contractor waste management plan 5. Environment Incident procedure 	Daniel Coutts, Matthew Murray, Brett Teale	
Plant and equipment leaks and spills	Spills into waterways from plant and equipment (e.g. hydraulic hose leaks, concrete loading, leaks from	3	5	2	30	May impact on surface	<ol style="list-style-type: none"> 1. Site EMS requires the following: to ensure that chemical storage areas must be suitably located and banded in a secure protected area with an 	Daniel Coutts, Matthew Murray, Brett Teale	

	vehicles)					water quality if it goes off site	impermeable floor. First flush systems act as capture / additional containment 2. Spill response measures implemented as per spill procedure or s5.5 of this Plan 4. Auditing of site EMS	
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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
- Surface coatings – paints, membranes, aerosol cans, other surface coatings
- Waste chemicals – including waste contaminated with chemicals such as soils, spill clean-up materials etc.
- 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_AII-07.007

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

Assessment completed for human health

Design, Re-assignment, Modification and Multiple Risk Assessment ~ WHS-Frm-AII-06.005

Issue date: 1/04/13

Authorised by: David Brial

Review date: 1/04/16

Use this form for designing new plant or process, modifying existing plant or process and for multi-hazard risk assessments.

Risk Calculator including current controls	Consequence (C) Severity of injury / illness		Exposure (E) (Freq & Duration)		Probability (Likelihood 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	

Name of Job / Process / Plant:- Hazardous and Non-Hazardous Chemical									
Site: Horsley Park			Prepared by: Cassandra Steppacher			Date: 19/06/2013			
Responsible manager: Steve Wall			Participants / Consultation: Works Managers						
Legislative references: POEO Act 1997									
Process flow - Describe the elements of the job / process / plant (hazards)	Risks	Current Controls	Risk Assess (Multiply values)	Proposed Controls	Responsibility	Date to be complete	Residual Risk	Review of controls (3mths)	Completed By: (Date)
Diesel	Spillage, Inhalation toxic fumes, Burns, environmental impact.	SDS, Mandatory PPE, Training, Spill Kit, EMS, Designated bunded areas for safe storage, SOP's for dispensing fuel, Hazardous chemical & DG register, MSP, Signage and placards	7x3x3 63	Further training with new PIRMP and systematic toolbox talks on the EMS	Cassandra Steppacher	19/06/13	3x3x2 12	19/09/13	
Paints/Thinner	Spillage, Inhalation toxic fumes, Burns, Explosion environmental impact.	SDS, Mandatory PPE, Training, Spill Kit, EMS, Designated Flammable cupboards for safe storage. Hazardous chemical & DG register,, MSP, Signage and placards	17x3x3 153	Further training with new PIRMP and systematic toolbox talks on the EMS	Cassandra Steppacher	19/06/13	7x3x2 42	19/09/13	
Oil and Grease	Spillage, Inhalation toxic fumes, Burn, slips trips,	SDS, Mandatory PPE, Training, Spill Kit, EMS, Designated bunded areas	7x3x3 63	Further training with new PIRMP and	Cassandra Steppacher	19/06/13	3x3x2 12	19/09/13	

Design, Re-assignment, Modification and Multiple Risk Assessment ~ WHS-Frm-AII-06.005

Issue date:1/04/13

Authorised by: David Briaf

Review date: 1/04/16

	environmental impact.	for safe storage and designated chemical substance cupboards for storage of smaller quantities, Hazardous chemical & DG register, MSP, Signage and placards		systematic toolbox talks on the EMS					
Pesticides	Spill, Fumes, Burn	SDS, Mandatory PPE, Training, Spill Kit, EMS, Designated bunded areas for safe storage and designated chemical substance cupboards for storage of smaller quantities, Hazardous chemical & DG register, MSP, Signage and placards	7x3x3 63	Further training with new PiRMP and continually toolbox talks on the EMS	Cassandra Steppacher	19/06/13	3x3x2 12	19/09/13	

ASSESSMENT COMPLETED FOR ENVIRONMENTAL HEALTH

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)** **Likelihood:**
the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,
- 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:**
the names, positions and 24-hour contact details of those key individuals who:
98C(g) 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,
- Authority Contact:**
98C(h) 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,
- Training of Staff:**
98C(m) 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,
- Updating of Plan:**
98C(o) the dates on which the plan is updated,
- Plan Testing**
98C(p) The manner in which the plan is to be tested and maintained.
- Availability of plan:**
(1) A plan is to be made readily available:
98D(1) (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:**
(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:
98D(2) (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:**
3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:
98D(3) (a) section 153C(a) of the Act, and
(b) Clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).

Privacy Protection:

- 98D(4) (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.

Minimum Testing:

- 2) Any such test is to be carried out:
- 98E(2) (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