

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*.

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

Purpose

The purpose of 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.

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.

*Please note the full version is not published on the webpage.

3 EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

3.1 Community Communication and Consultation

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

3.2 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.

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

Call Fire and Rescue first 000

Order to call	Relevant Authorities	Contact numbers for: Horsley Park (EPL 546)	Contact numbers for: Bowral (EPL 2073), Bunnygalore (EPL 4249), New Berrima (EPL 20377)	Contact numbers for: Punchbowl (EPL 2240)
1st	EPA	131 555 (press 1)	131 555 (press 1)	131 555 (press 1)
2nd	Ministry of Health	(South West Sydney Local Health District Public Health Unit) 8778 0829 8778 0855	(South West Sydney Local Health District Public Health Unit) 8778 0829 8778 0855	(Sydney Local Health District Public Health Unit - Canterbury) 9515 9420
3rd	WorkCover	131 050 (press 2)	131 050 (press 2)	131 050 (press 2)
4th	Local Authority-	Fairfield City Council 9725 0222 (hold)	Wingecaribee Shire Council 4868 0888	Canterbury Council 9789 9300 (hold)
5th	Fire and Rescue NSW – Pollution incident notification hotline	1300 729 579	1300 729 579	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. The Plant Manager 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.

Protocol to notify neighbours of incident

Purpose: To outline the procedure required to notify potentially affected neighbours if incident occurs

Scope: This MSP applies to all Brickworks NSW sites, including Managers, Supervisors, employees and First Aiders.

Community Communication and Consultation

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

Austral Bricks will continue to update the community where required as outlined in this procedure.

An assessment of the typical pollution incident types has been undertaken to consider the potential impacts on neighbours. This resulted in the early warning actions located in table below.

List of Typical Main Pollutants and Potential Neighbour Impacts and Early Warnings

Air Based Emissions		
Description	Potential Risks	Early Warning actions
Dust	Air quality issues Loss of amenity Community complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Fire - smoke	Air quality issues	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice. For larger fires, coordinate with combat agencies.
Noise	Loss of amenity	Not required under PIRMP. Communicate with neighbours on as needs basis.
Odour	Air quality issues Loss of amenity Community Complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Spill type emissions		
Fuel including diesel and petrol based fuels	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Lubricants and hydraulic oils	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Pesticides/herbicides	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further

		notice. For larger spills coordinate with combat agency.
Other chemicals	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Soils and erosion	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Contaminated materials uncovered	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Wastes	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice