

A wide-angle photograph of a quarry or aggregate processing site. In the foreground, there are large piles of grey gravel and a concrete curb. A water spray is being directed at a pile of material in the middle ground, creating a misty effect. To the right, a yellow wheel loader is partially visible. The background shows more piles of material and trees under a bright blue sky with scattered white clouds.

Humes Grafton

Pollution Incident Response Management Plan

Humes Grafton - Pollution Incident Response Management Plan (PIRMP)

Revision/ Checking History

| Revision Number | Date | Checked | Issued |
|------------------------|-------------|--|---------------|
| 5 | Sep 2020 | Shilpa Shashi - NSW/ACT Planning & Environment Coordinator | Shilpa Shashi |
| 6 | Nov 2021 | Shilpa Shashi - NSW/ACT Planning & Environment Coordinator | Shilpa Shashi |

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Appendices

- A Emergency Contact Details
- B Pollution Incident Response Test Checklist
- C Community Notification Strategy
- D Maps

Glossary of Acronyms

PIDS- Pollution Information Data Sheet

PPE- Personal Protective Equipment

SDS- Safety Data Sheets

PEOA- Protection of the Environment Operations Act 1997

1. Purpose

The purpose of this document is to detail the pollution incident response management plan for the Humes Grafton, to comply with Section 5.7A of the Protection of the Environment Operations (POEO) Act:

Protection of the Environment Operations Act 1997 No 156

Part 5.7A Duty to prepare and implement pollution incident response management plans

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.

Maximum penalty:

- (a) in the case of a corporation—\$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or*
- (b) in the case of an individual—\$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.*

153B EPA may direct other persons to prepare pollution incident response management plan

- (1) The EPA may, in accordance with the regulations, require the occupier of premises at which industry is carried out to prepare a pollution incident response management plan that complies with this Part in relation to activities at the premises.*
- (2) A person must not fail to comply with such a requirement.*

Maximum penalty:

- (a) in the case of a corporation—\$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or*
 - (b) in the case of an individual—\$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.*
- (3) The regulations may make provision for or with respect to:*
- (a) the class or classes of premises, or industries carried out at premises, that may be the subject of a requirement to prepare a pollution incident response management plan, and*
 - (b) the circumstances in which some or all premises within those classes may be the subject of a requirement to prepare a pollution incident response management plan.*

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.

Maximum penalty:

- (a) *in the case of a corporation—\$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or*
- (b) *in the case of an individual—\$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.*

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.

Maximum penalty:

- (a) *in the case of a corporation—\$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or*
- (b) *in the case of an individual—\$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.*

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.

Maximum penalty:

- (a) *in the case of a corporation—\$2,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues, or*
- (b) *in the case of an individual—\$500,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues.*

2. Scope

The scope of this management plan includes:

Pollution Incident Response Management Plan (PIRMP) for environmental pollution generated at the Humes Grafton

3. Definitions

Pollution Incident - 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.

Material Harm - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs, and

Loss - the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent mitigate or make good harm to the environment.

4. Associated Documentation

- Protection of the Environment Operations Act 1997
- Protection of the Environment (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012
- Appendix A: Emergency Contact Details
- Appendix B: Pollution Incident Response Test Checklist
- Appendix C: Community Notification Strategy

5. Responsibility

The following personnel are responsible for the PIRMP;

- 1) Activating the plans and managing the response: **Mitchell Rose – Operations Manager**
- 2) Notifying and coordinating relevant authorities: **Mitchell Rose– Operations Manager**
- 3) Implementation and management of this document: **Shilpa Shashi– Planning and Environmental Coordinator NSW / ACT.**
- 4) Annual review and test of PIRMP- **Mitchell Rose– Operations Manager**

6. Record Retention

A copy of all Quarry pollution incident response records will be retained on site in accordance with SHE guideline 1.4 – Administrative and Legal Requirements. A copy will also be saved electronically on google drive in the 'Site PIRMPs Final' folder and linked with the site's SHE schedule.

Records must be made available to EPA officers and any person responsible for the PIRMP.

7. Procedure

The following section outlines the management procedures for pollution incident response management. The protocol is split into three sections:

- 1) Key environmental hazards and mitigation measures
- 2) Pollutant and Safety equipment information and management of Pollution Incidents
- 3) Emergency Response Maps

7.1 Environmental Impact and Hazard Register

In order to effectively plan for a potential pollution event, a register of environmental hazards has been created. Each hazard has been assessed in accordance with the Holcim SHE Risk Assessment tool (see Table 1 below).

The hazards have been grouped according to the area of environmental impact. By identifying these hazards ahead of time, mitigation measures can be identified and implemented through site procedures to minimise the risk of a pollution event occurring (table 2 below).

Table 1: Holcim SHE Risk Score Matrix

| |
|---|
| Step 1 - Consider the Consequence |
| What are the consequences of the most reasonable worst case scenario considering a credible failure of existing controls? |

| Consequence | Disaster | Severe | Serious | Significant | Minor |
|---|---|--|--|---|--|
| Environment On Site & Off Site | Major event, unconfined impact, severe permanent damage with low likelihood of recovery. | Significant permanent damage; reversible damage with recovery time of years; high potential for prosecution | Minor permanent damage; temporary damage that is widespread or that has moderate impact | Damage that is near source confined, temporary and minor | No measurable damage to environment |
| Compliance With Legal and Other Requirements | Blatant or serious breach of legal requirement, leading to operation being suspended or severely reduced. Prosecution expected. | Breach of external requirement (license, legislation, regulation, contract etc.) with high potential for prosecution and/or high impact. | Non-compliance with external requirement with moderate potential for impact. | Repeated non-compliance with internal procedure, non-compliance with external requirement with low potential impact | Minor non-compliance with internal procedures. |
| Community Perception and Reputation | Significant adverse media attention (state or national level), loss of reputation or work nationally or across product groups. | Prosecution, significant impacts on social license to operate, loss of reputation or ability to secure work across product groups. | Local adverse media attention, loss of reputation or ability to secure work in local area, complaints that result in changes to external requirements. | Multiple community complaints or complaints that require changes to internal operating procedures. | Community complaint resolved with no changes to existing operating procedures. |

Note: Temporary environmental damage has a duration of up to approximately one week to rectify

| Step 2 - Consider the Likelihood | | | | | |
|---|---|--|--|--|---|
| What is the likelihood that the proposed consequence will occur with a credible failure of existing controls? | | | | | |
| Likelihood | Certain | Likely | Possible | Unlikely | Rare |
| Description | Event that is expected to occur on multiple occasions | Event that is likely to occur at least once | Event that may occur | Event that is unlikely to occur | Event that may occur only in exceptional circumstances |
| Frequency | Event is likely to occur more than twice a year. | Event is likely to occur once or twice a year. | Event is likely to occur more than once or twice in a 10 year period | Event is likely to occur once or twice in a 10 year period | Event is likely to occur once or twice in a 100 year period |

| Step 3 - Determine Risk Rating from the Risk Matrix | | | | | |
|---|--------------|--------|---------|-------------|--------|
| Likelihood | Consequences | | | | |
| | Disaster | Severe | Serious | Significant | Minor |
| Certain | High | High | High | Medium | Medium |
| Likely | High | High | Medium | Medium | Low |
| Possible | High | Medium | Medium | Low | Low |
| Unlikely | Medium | Medium | Low | Low | Low |
| Rare | Medium | Low | Low | Low | Low |

Table 2: Holcim Quarry Environmental Impact and Hazard Register

| Key Environmental Hazards | | Risk | | | Mitigation Measures | Revised Risk | | |
|---------------------------|---|----------|-------------|-----|---|--------------|-------------|-----|
| | | L | C | R | | L | C | R |
| Air Quality | | | | | | | | |
| 1 | Excessive dust emissions | Unlikely | Significant | Low | <ul style="list-style-type: none"> Water carts/spraying Stop dust generating activities as necessary Application of GRT dust suppression chemical on all unpaved roads | Unlikely | Significant | Low |
| 2 | Health issues off site | Rare | Significant | Low | <ul style="list-style-type: none"> As per (1) | Rare | Significant | Low |
| 8 | Equipment exhaust emissions exceed limits | Rare | Minor | Low | <ul style="list-style-type: none"> All equipment is serviced and maintained Excessive equipment emissions to trigger out of service procedures | Rare | Minor | Low |

| Key Environmental Hazards | | Risk | | | Mitigation Measures | Revised Risk | | |
|---------------------------|---|----------|---------|--------|---|--------------|---------------|-----|
| | | L | C | R | | L | C | R |
| 2 | Discharge of hazardous materials | Rare | Severe | Low | <ul style="list-style-type: none"> Ensure storage, handling and transport of dangerous goods are conducted in accordance with relevant Australian Standard Identify classify, quantify & appropriately store hazardous waste Develop & implement oil & fuel spillage controls Implement bunding to appropriate areas Ensure adequate spill kits are available on site including adequate training for effective use Minimise hazardous waste storage quantities on site Appropriate location of hazardous materials storage areas to prevent off-site discharges | Rare | Serious | Low |
| Land | | | | | | | | |
| 1 | Spill of liquid fuel whilst in storage | Rare | Serious | Low | <ul style="list-style-type: none"> Fuels stored according to Holcim's bunding requirements. Measures in place to ensure spills do not leave site boundaries ie diverting flow away from boundaries, stormwater drains. Bunding subject to regular inspection and maintenance | Rare | Significant † | Low |
| 2 | Spill during delivery of fuel to mobile equipment | Possible | Severe | Medium | <ul style="list-style-type: none"> Breakaway couplings installed on mobile fuel delivery vehicles. Drivers stay with vehicle during refuelling Emergency spill kits located on fuel delivery vehicles. Spill response equipment is regularly inspected and maintained Mobile refuelling takes place in the pit Drivers trained in spill response procedures. Refuelling takes place in designated refuelling areas. | Unlikely | Significant † | Low |
| 3 | Spill during delivery of fuel to storage tank | Possible | Severe | Medium | <ul style="list-style-type: none"> Supplier's fuel transfer procedure is known Fuel transfer is supervised against suppliers procedure | Unlikely | Significant † | Low |

| Key Environmental Hazards | | Risk | | | Mitigation Measures | Revised Risk | | |
|---------------------------|--|--------|---------------|--------|---|--------------|---------------|-----|
| | | L | C | R | | L | C | R |
| 5 | Improper storage of cementitious materials | Likely | Significant | Medium | <ul style="list-style-type: none"> Ensure water leachate is contained on site Quantities held on site are minimised or capped Location of stockpiles close to processing point Cementitious materials are managed in accordance with approval conditions Excess cementitious materials are disposed of in accordance with legislative requirements | Unlikely | Significant | Low |
| 6 | Land contamination | Likely | † Significant | Medium | <ul style="list-style-type: none"> Holcim land contamination strategy is known and applied | Unlikely | † Significant | Low |

7.2 Pollutant and Safety Equipment Information

Legislative requirements under the Protection of the Environment Operations (POEO) Act dictate that the site is to provide information for all pollutants that are used and stored on the site. This information is required as it assists personnel responsible for coordinating spill responses to more effectively manage spills.

This information must be presented as a manifest detailing the pollutants stored at the site, the location of these storage areas, and the safety equipment to be made available at these areas. A Pollution Information Data Sheet (PIDS) has been prepared that includes the following information for each pollutant. Refer to table 3 below

- The intended use for the pollutant
- How the pollutant is stored
- SDS information
- 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
- PPE needed to safely manage a spill of the pollutant
- Procedure for cleaning up a spill of the pollutant.

In order to ensure the currency and reliability of the information in the PIDS, the information should be reviewed and updated on a monthly basis.

Table 3: Pollutant Information Data Sheet and clean-up methods

| Pollutant | Storage Location | Current SDS held Yes/No | Emission control equipment (1) | PPE (1) | Spill Clean Up Method (1) |
|---------------|------------------|-------------------------|--------------------------------|--|---|
| Fuel (1000 L) | Fuel Shed | Yes | Sand, earth, vermiculite | PVS gloves, safety glasses, goggles, steel cap boots and respirator mask | <p><u>Large Spill</u></p> <p><u>Assess</u></p> <p>Quickly assess the spill:</p> <p>Decide whether to handle the situation by yourself or if you require help. Advise your team of the hazard Post a guard or barricade Can you stop the source of the spill?</p> <p><u>Ensure Personal Safety</u></p> <p>First priority is to ensure safety of yourself and others in the area Consider evacuation and isolation. Do you or others require PPE Check Safety Data Sheet</p> <p><u>Secure</u></p> <p>Secure the spill If hazardous to public or other staff exists Post a guard immediately Enter barricades to prevent unintended access</p> <p><u>Contain</u></p> <p>Contain the spill quickly by surrounding with the booms which should be firmly secured in place. Find the source of the leak and stop it, Emergency stop, cap, plug, move, adjust. Move other containers from that area to a bunded area</p> <p>In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment.</p> <p><u>Prevent</u></p> <p>Prevent spillage to stormwater drains and entry into sewer, water courses, basements or confined areas.</p> |

| Pollutant | Storage Location | Current SDS held Yes/No | Emission control equipment (1) | PPE (1) | Spill Clean Up Method (1) |
|-----------|------------------|-------------------------|--------------------------------|---------|--|
| | | | | | <p><u>Absorb</u></p> <p>Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation.</p> <p>Recover product from the surface.</p> <p>Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor</p> <p><u>Disposal</u></p> <p>Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation.</p> <p>Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor.</p> <p>Contaminated absorbent material may pose the same hazard as the spilt product. Monitor its disposal. The spill soiled bags need to be labelled and ear marked and placed in a leak proof container which is locked. SDS should be made available.</p> <p><u>Reporting</u></p> <p>Incident and Corrective and Preventative action should be captured on the iCare.</p> <p><u>Small Spill</u></p> <p>Stop leak without risk.</p> <p>Move containers from spill area</p> <p>Absorb with an inert material and place in appropriate waste disposal container.</p> <p>Use spark-proof tools and explosion-proof equipment.</p> |

| Pollutant | Storage Location | Current SDS held Yes/No | Emission control equipment (1) | PPE (1) | Spill Clean Up Method (1) |
|------------|------------------|-------------------------|--|-------------------------------------|---|
| | | | | | Dispose of via a licensed waste disposal contractor. |
| Lubricants | Shed | Yes | Sand, earth, vermiculite, barrier equipment (booms, floats etc.) | PVC Gloves, safety glasses, goggles | <p><u>Large Spill</u></p> <p><u>Assess</u></p> <p>Quickly assess the spill:</p> <p>Decide whether to handle the situation by yourself or if you require help. Advise your team of the hazard Post a guard or barricade Can you stop the source of the spill?</p> <p><u>Ensure Personal Safety</u></p> <p>First priority is to ensure safety of yourself and others in the area Consider evacuation and isolation. Do you or others require PPE Check Safety Data Sheet</p> <p><u>Secure</u></p> <p>Secure the spill If hazardous to public or other staff exists Post a guard immediately Enter barricades to prevent unintended access</p> <p><u>Contain</u></p> <p>Contain the spill quickly by surrounding with the booms which should be firmly secured in place. Find the source of the leak and stop it</p> <p>Emergency stop, cap, plug, move, adjust</p> <p>Move other containers from that area to a bunded area</p> <p>In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment.</p> |

| Pollutant | Storage Location | Current SDS held Yes/No | Emission control equipment (1) | PPE (1) | Spill Clean Up Method (1) |
|-----------|------------------|-------------------------|--------------------------------|---------|--|
| | | | | | <p><u>Prevent</u></p> <p>Prevent spillage to stormwater drains and entry into sewer, water courses, basements or confined areas.</p> <p><u>Absorb</u></p> <p>Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation.</p> <p>Recover product from the surface.</p> <p>Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor</p> <p><u>Disposal</u></p> <p>Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation.</p> <p>Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor.</p> <p>Contaminated absorbent material may pose the same hazard as the spilt product. Monitor its disposal. The spill soiled bags need to be labelled and ear marked and placed in a leak proof container which is locked. SDS should be made available.</p> <p><u>Reporting</u></p> <p>Incident and Corrective and Preventative action should be captured on the ICare.</p> <p><u>Small Spill</u></p> <p>Stop leak without risk.</p> <p>Move containers from spill area</p> |

| Pollutant | Storage Location | Current SDS held Yes/No | Emission control equipment (1) | PPE (1) | Spill Clean Up Method (1) |
|--|------------------|-------------------------|--------------------------------|----------------------------|--|
| | | | | | <p>Absorb with an inert material and place in appropriate waste disposal container.</p> <p>Use spark-proof tools and explosion-proof equipment.</p> <p>Dispose of via a licensed waste disposal contractor.</p> |
| Vehicle fluids (2L – Hydraulic Oil) | Maintenance | Yes | Sand, earth, vermiculite | PVC Gloves, safety glasses | <p><u>Large Spill</u></p> <ol style="list-style-type: none"> 1) In the case of large spills contact relevant personnel 2) Stop leak without risk. 3) Move containers from spill area. 4) Approach the release from upwind 5) Prevent entry into sewer, water courses, basements or confined areas. 6) Wash spillages into an effluent treatment plant or proceed as follows. 7) Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation. 8) Contaminated absorbent material may pose the same hazard as the spilt product <p><u>Small Spill</u></p> <ol style="list-style-type: none"> 1) Stop leak without risk. 2) Move containers from spill area 3) Dilute with water and mop up, or absorb with an inert dry material and place in appropriate waste disposal container 4) Dispose of via a licensed waste disposal contractor. |

(1) This information is drawn from a review of the SDS or manufacturer/supplier technical information

7.3 Emergency Response Map

In addition to the PIDS the site needs to prepare an emergency response map that provides the following information;

- address of site
- location of pollutant storage
- location of safety equipment
- emergency evacuation / muster points
- stormwater drains / flow paths
- sensitive receivers
- sediment dam overflow locations
- location of SDS
- surrounding area that is likely to be affected by a pollution incident
- discharge location of stormwater drains to nearest water course or water body

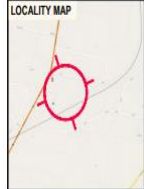
Existing site maps that have been developed to comply with Holcim SHE system requirement may be used if all the required items have been included. If an existing map is not available it should be created.

It is important to clearly identify these items so as to be able to respond in an emergency situation.

EMERGENCY
DIAL 000
IN CASE OF
EMERGENCY

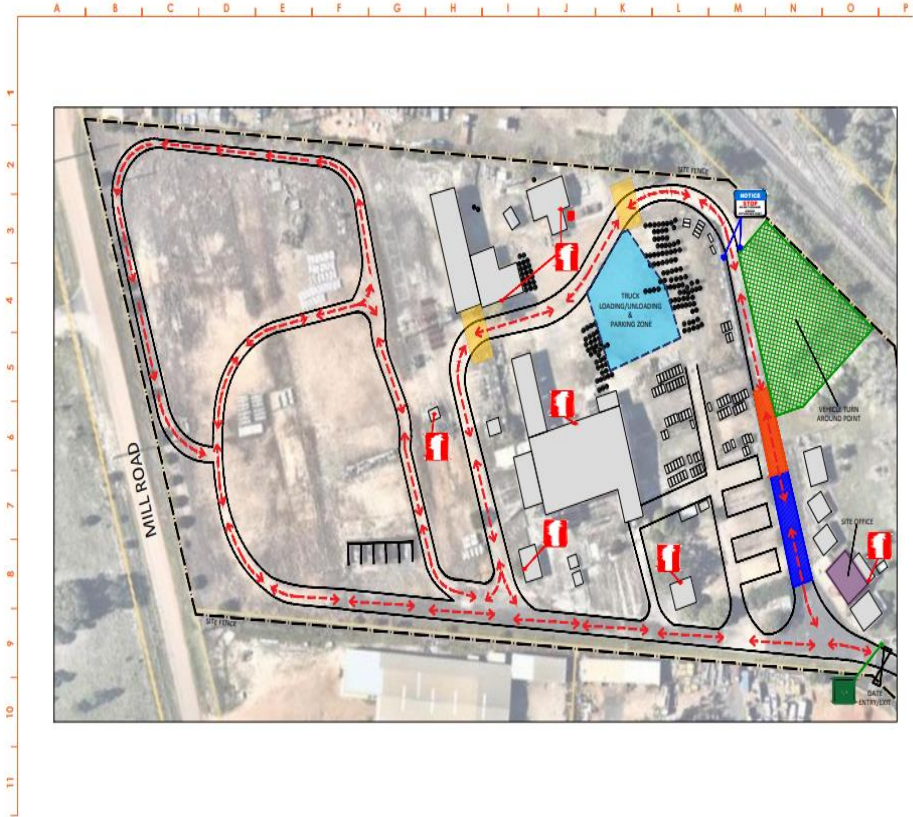
FIRE EXTINGUISHER USAGE GUIDE

| | |
|---|---------------------------------|
| ▶ | EXTINGUISHER (WATER) |
| ▶ | EXTINGUISHER (FOAM) |
| ▶ | EXTINGUISHER (CO ₂) |
| ▶ | EXTINGUISHER (DRY POWDER) |
| ▶ | EXTINGUISHER (WET CHEMICAL) |



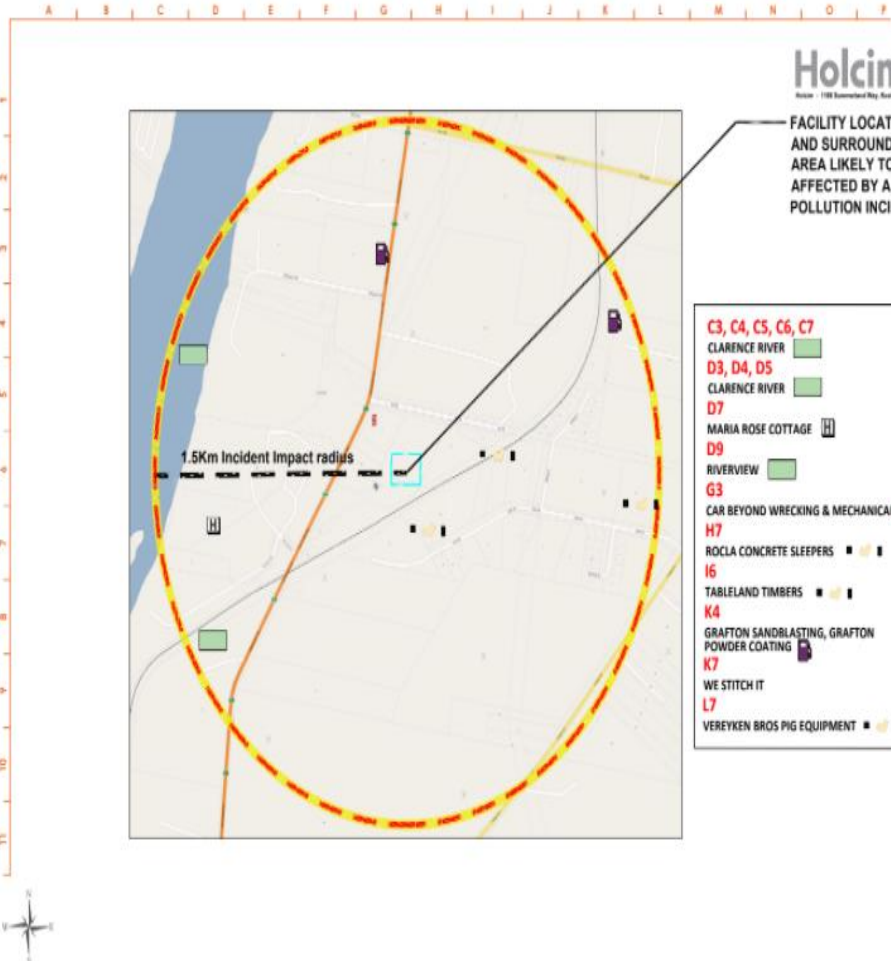
LEGEND

- EMERGENCY ASSEMBLY AREA
- FIRE EXTINGUISHER
- DRIVER SAFE ZONE
- TRAFFIC FLOW
- STOP - DO NOT PROCEED BEYOND
- SMALL LOAD, LOADING ZONE
- ALL VEHICLE STOP ON ENTRY POINT
- VEHICLE TURN AROUND POINT
- LOADING ZONE EXCLUSION TAPE
- TRUCK PARKING ZONE
- TRUCK LOADING/UNLOADING ZONE
- SITE OFFICE
- GATE



EMERGENCY
DIAL 000
IN CASE OF
EMERGENCY

- State Road
- Network Numbers
- National & Alternative Routes
- Metropolitan Route Number
- Tourist Route Number
- Police Stations
- Hospital
- Post Offices, Post Shops
- Public Telephones
- Places of Worship
- Public Works
- Restaurants
- Toilets
- Child Care Centres
- Kindergartens, Pre-School Centres
- Library
- Facility for the Disabled
- Facility for the Disabled
- Features, Buildings, Pavilions
- Walking Tracks
- Emergency Telephones
- Service Station
- Car Parks, Undercover Parking, Car Park Entrances
- Shopping Centres
- Shopping
- Malls or Public Open Spaces
- Parks, Recreational Reserves
- Water Use
- Property Line
- 1000 Meters Radius
- 1.500km Incident Impact Zone



Holcim
1166 Summerland Way, Koolkhan

FACILITY LOCATION AND SURROUNDING AREA LIKELY TO BE AFFECTED BY A POLLUTION INCIDENT

- C3, C4, C5, C6, C7**
CLARENCE RIVER
- D3, D4, D5**
CLARENCE RIVER
- D7**
MARIA ROSE COTTAGE
- D9**
RIVERVIEW
- G3**
CAR BEYOND WRECKING & MECHANICAL
- H7**
ROCLA CONCRETE SLEEPERS
- I6**
TABLELAND TIMBERS
- K4**
GRAFTON SANDBLASTING, GRAFTON POWDER COATING
- K7**
WE STITCH IT
- L7**
VEREYKEN BROS PIG EQUIPMENT

PIRMP Review

Review of PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Reviewing shall be undertaken in the following ways:

The PIRMP will be tested annually and any identified updates or changes will be made. The PIRMP will be tested and reviewed within one month from the date of any pollution event that triggers this PIRMP. The review will also consist of assessment of any additional hazards and control measures.

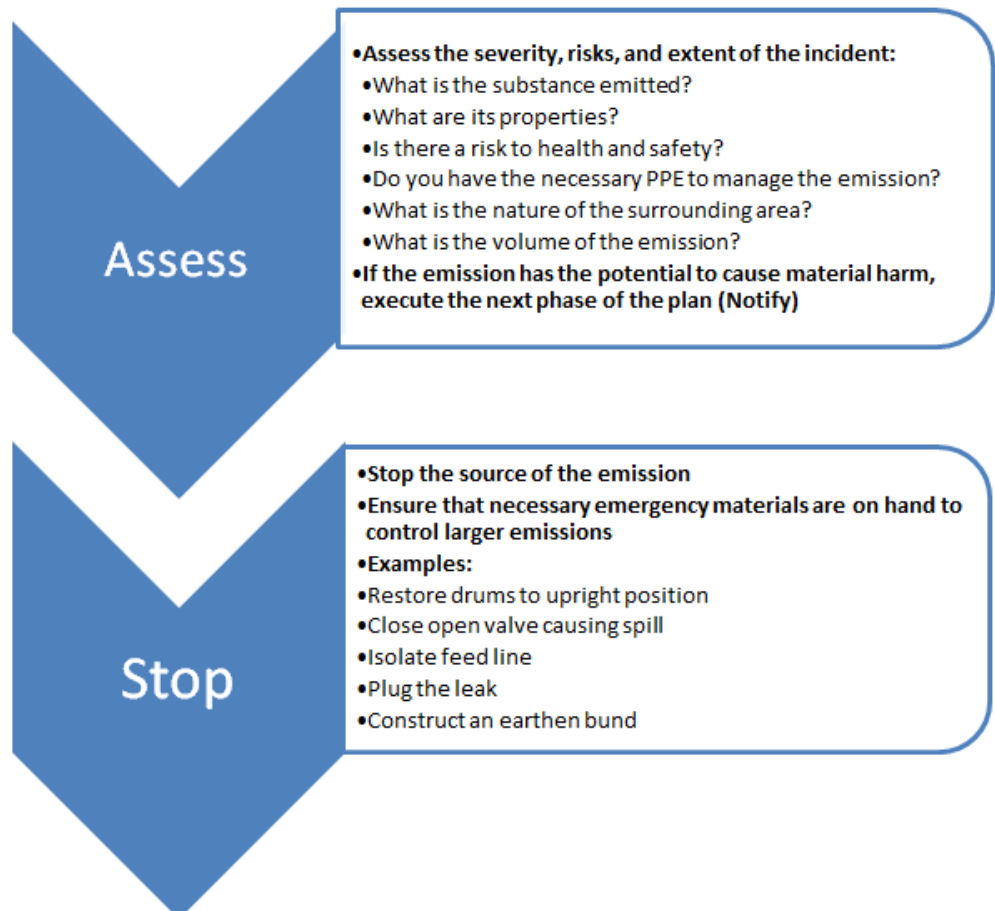
In addition to site evacuation drills, a mock environmental incident will be done once a year to ensure all site personnel are following training and correct procedures. The mock scenario will be set and all the actions will be captured on the check sheet. Based on these mock incidents, the Site manager and the Planning and Environmental Coordinator will review the site personnel preparedness and site procedures to identify gaps or areas for improvement. Records of the drill will be maintained, including follow up of opportunities for improvement identified during emergency drills.

7.5 Typical Holcim Response process

If it is suspected that an incident may cause material environmental harm the Pollution Incident Management Response Plan will be executed. This plan is based on seven phases:

1. Assess
2. Stop
3. Notify
4. Contain
5. Mitigate
6. Clean up
7. Review

Details of the requirements and responsibilities for each phase are explained below.



Notify

- **Contact key individuals**
 - Individuals responsible for activating and managing plans (nominated site representatives)
 - Individuals authorised to notify and coordinate relevant authorities (nominated site representatives)
- **Contact Relevant Authorities**
 - Firstly, call 000 if the incident presents an immediate threat to human health or property.
 - If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:
 - the Appropriate Regulatory Authority
 - EPA
 - Ministry of Health via the local Public Health Unit
 - WorkCover Authority
 - the local authority if this is not the ARA
 - Fire and Rescue NSW
- *Specific contact details are provided in appendix A*

Contain

- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission from spreading.
- When an emission is on a hard surface use appropriate absorbent materials ie absorbent granules or sand
- The main priority is to prevent the emitted material from discharging off site

Mitigate

- Implement environmental controls downstream of pollution source to prevent/minimise further impact to receiving environment
- Example:
 - A Fuel spill discharged into quarry dam. Mitigation controls to ensure this spill is not spread may include closing of weirs, or outlets, ensuring water cart does not fill from affected dam etc.

Clean -up

- Clean up and remedial actions to restore the environment
- Disposal of pollutants in accordance with regulations
- Refer to the Pollution Information Data Sheets (PIDS) for information on handling pollutants and the clean-up process.

Review

- Conduct an investigation into the event and assist the EPA and investigators with external enquiries
- Complete internal reporting;
- As per Holcim SHE requirement 5.1
- Test the effectiveness of Pollution Incident Response Management Plan annually and one month after the incident to ensure controls are replenished.
- *Testing protocol is provided in appendix B*

7.5 Communication Strategy

It is a legal requirement of the Protection of the Environment Operations (POEO) Act, to notify key stakeholders in neighbouring properties that may be affected by an incident.

Communicating with neighbours and the community in the event of an environmental incident is vital as they have a right to know about any spill that can potentially lead to material harm to their properties or themselves. The communication strategy in the PIRMP provides sites with a method of communicating with key stakeholders.

Key stakeholders include neighbouring residential and/or commercial properties, sensitive receivers ie farms, hospitals schools within the area of impact. Consideration must be given to sensitive receivers that may be affected if the emission reaches a water body. For example a farmer that is cultivating crops down river from your site will need to be informed of a spill to prevent him spraying his crops with polluted irrigation water.

The PIRMP must include details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by an incident occurring at the premises.

The communication strategy should also make reference to any actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises at the time of an incident. This is a legislative requirement that needs to be included in the PIRMP.

For a table detailing the communication strategy for this site:

Refer to Appendix C – Community Notification Strategy

7.6 Staff Training

Sites need to develop a toolbox talk based on the PIRMP. This training should be delivered to all appropriate personnel on site and be conducted to include potential scenarios that may require implementation of the plan.

Frequency of training

Training for site staff should be repeated annually, and after each update to the plan. In the event of an incident requiring the PIRMP to be activated a training drill should be carried within one month of the incident occurring.

How Records of training are kept

Training records should be stored on site and in the data base. This data base is the primary online tool for tracking individual staff training records and frequency for training and refresh courses. These records are to be made available to relevant authorities on request.

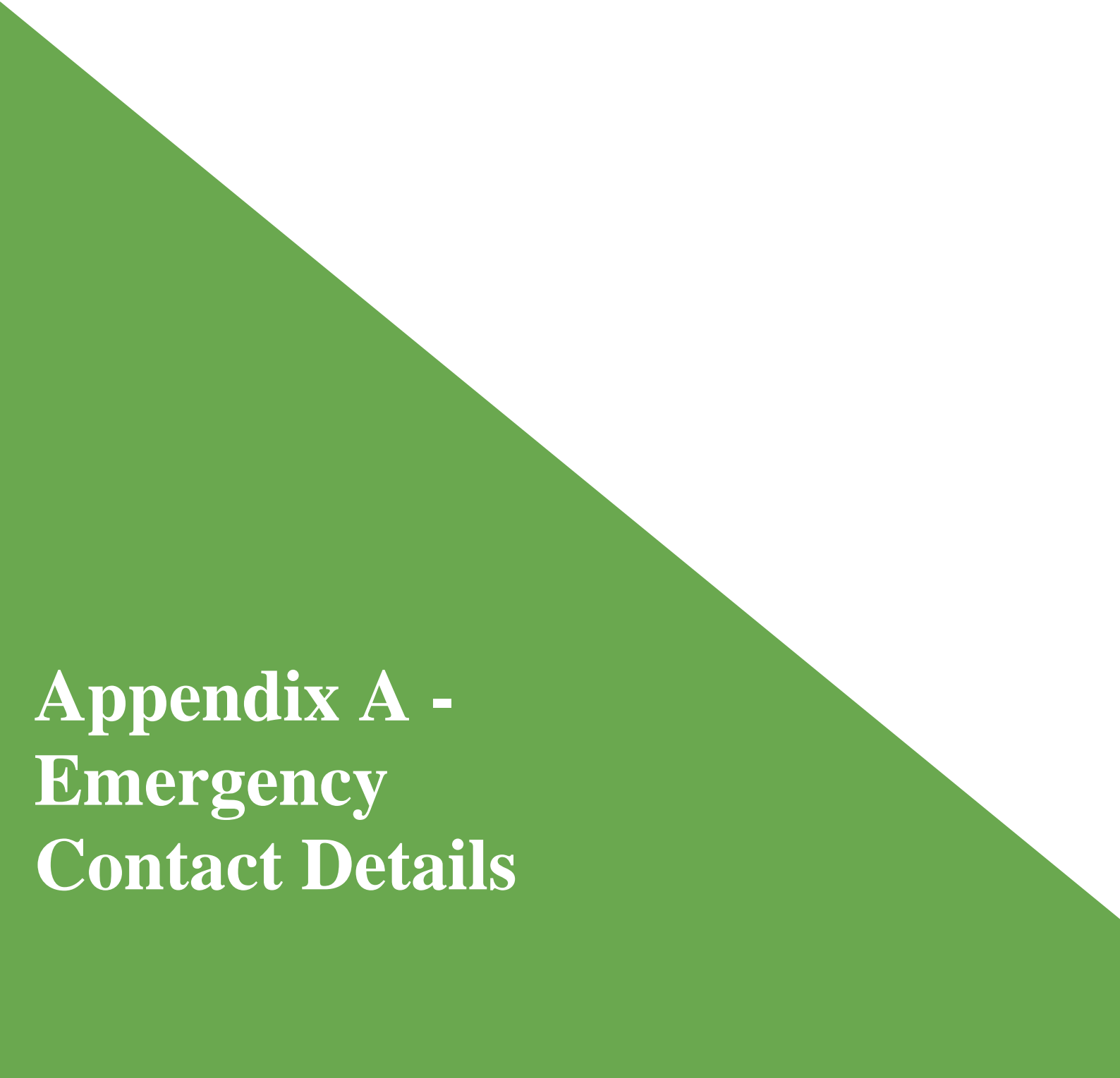
7.7 Continual Improvement

It is a legislative requirement for this plan to be tested and updated on an annual basis and within one month of an incident.

To complete this requirement a Pollution Incident Response Test Checklist has been prepared and provided as Appendix B. The checklist includes the major elements of the plan that require testing:

- Contact numbers
- Evacuation drills
- Desktop assessment
- Staff training and awareness
- Environmental controls & PPE

Desktop assessments require site personnel, responsible for testing the plan, to select a scenario from the hazard and impact register (table 2) and ensure that all the required controls for the scenario are in place. During the desktop assessment environmental control and PPE equipment supplies should be inspected to ensure that they are functional and that there are enough materials to ensure that emissions relating to the scenario can be controlled effectively and safely.

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Appendix A - Emergency Contact Details

| Contacts | Phone Number |
|---|---|
| Individuals responsible for activating the plans and managing the response | Mitchell Rose |
| Individuals Authorised to Notify and Coordinate Relevant Authorities | Mitchell Rose / Francis Chou |
| Emergency Services | 000 |
| EPA | 131 555 |
| The Ministry of Health via the local Public Health Unit (List of NSW numbers www.health.nsw.gov.au/publichealth/infectious/phus.asp) | Grafton Base Hospital (02) 6640 2222 (Ask for Public Health Officer on call) |
| WorkCover Authority | 13 10 50 |
| Local Council | Clarence Valley Council 02 6643 0200 |
| Fire and Rescue NSW | 000 |
| Individuals responsible for activating the plans and managing the response | Mitchell Rose |

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Appendix B - Pollution Incident Response Test Checklist

Date:.....

Site:.....

Address:.....

Pollution Incident Scenario:.....

Instructions

1. Select an Environmental Incident applicable to the site to test in a Pollution Scenario (this may include a major spill, equipment failure or breaches of license consent that may cause impacts onsite and to the surrounding community);
2. Using the scenario conduct a desktop review using the Test Checklist as a prompt to ensure that each component of the PIRMP is up to date;
3. Sign off the checklist, scan and send to the NSW Planning & Environmental Coordinator;
4. Planning & Environmental Coordinator will make amendments to the plans and submit these to the site managers for review and approval;
5. Site Managers to hold a tool box talk with staff on the details of the PIRMP and keep a copy of the PIRMP onsite for future reference.

| Are all contact details within the plan current and up to date? | Phone Numbers | |
|--|----------------------|-----------------------|
| | Currency | Updated Number |
| Individuals responsible for activating the plans and managing the response | | |
| Individuals Authorised to Notify and Coordinate Relevant Authorities | | |
| Emergency Services | | |

| | | |
|---|--|--|
| EPA | | |
| The Ministry of Health via the local Public Health Unit | | |
| WorkCover Authority | | |
| Local Council | | |
| Fire and Rescue NSW | | |
| Additional Contacts relevant to the licensee's premises | | |
| Other Organisations or agencies that need to be advised of the incident | | |

| Environmental Hazards and Control Standards | Yes/ No | Actions |
|---|----------------|----------------|
| Are the descriptions of environmental hazards up to date? | | |
| Are the potential and likelihood of incidents that could occur still correct and relevant to the site operations? | | |
| Are the pre-emptive actions for risk management of the relevant activity correct and relevant to the site? | | |
| Is there an inventory of pollutants (including | | |

| | | |
|---|--|--|
| quantities of pollutants onsite)? | | |
| Is the listed safety equipment & PPE correct and up to date? | | |
| <p>Is there a map/s located onsite detailing the following;</p> <ul style="list-style-type: none"> - The site and the surrounding area likely to be affected in the event of an incident - The Locations of storage/ holding points of pollutants - Stormwater drains and discharge points offsite | | |
| Are the nature and objectives of staff training set out in the plan? | | |
| Are there details of mechanisms for providing early warnings and regular updates to the owners and occupiers? | | |
| Is there a copy of the plan onsite and up to date? | | |

Has there been an evacuation drill in the last 12 months?

Date:.....

Notes:.....

Improvements to the Pollution Incident Response Management Plan:

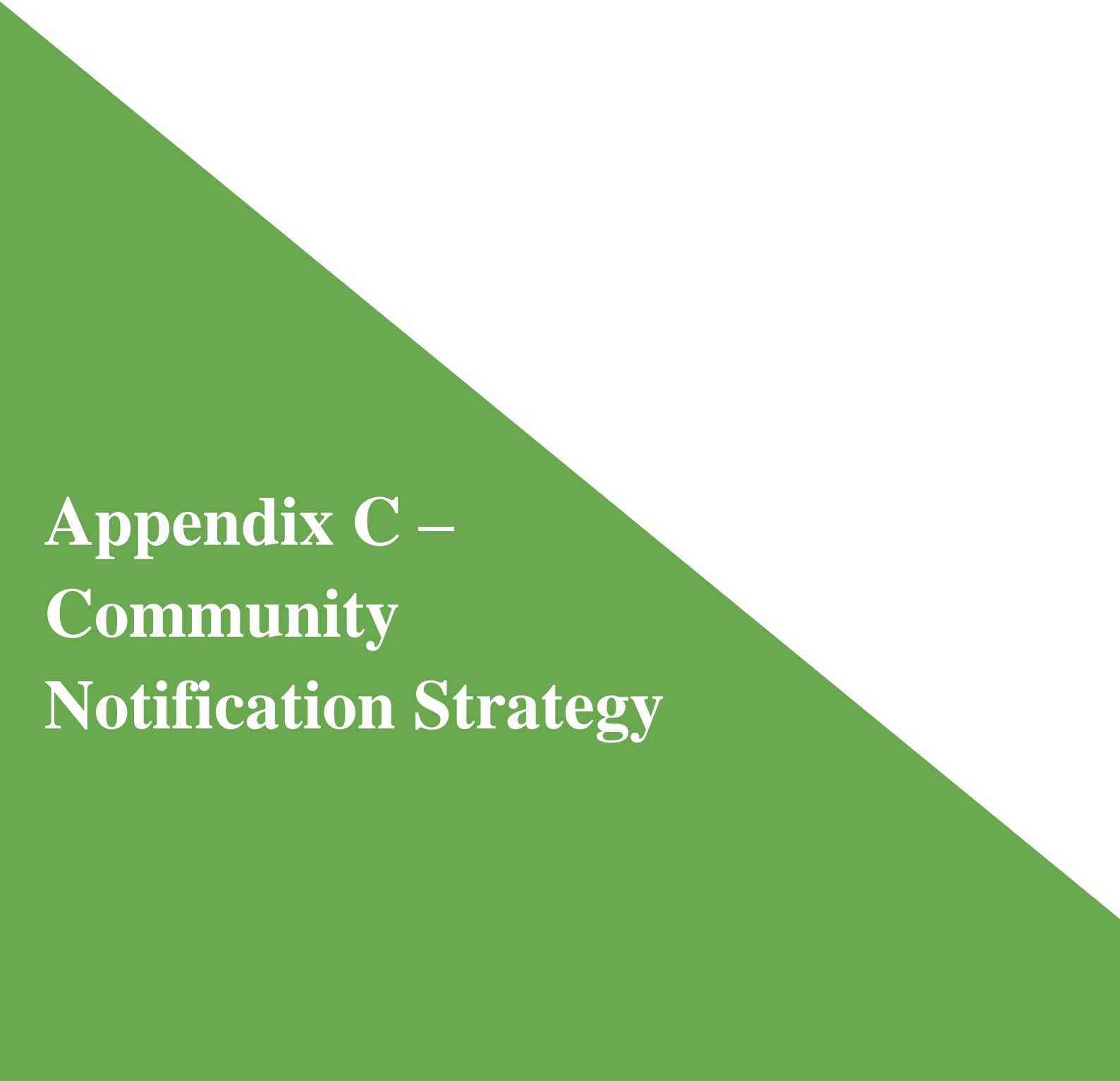
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Comments / Recommendations / Review

-
-
-
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Pollution Incident Response Test Checklist Assessor:.....

Signed:.....

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Appendix C – Community Notification Strategy

If there is an Environmental Incident that has the potential to cause harm to the following stakeholders they will be contacted by TELEPHONE

| Stakeholder Component | Name | Contact Information |
|------------------------------|-------------------------|----------------------------|
| | Clarence Valley Council | 02 6643 0200 |
| | MA Smith Engineering | 02 6644 7262 |
| | Protection Barriers | 02 6644 7775 |
| | ARTC | 08 8217 4366 |
| | | |