

INTRODUCTION

The Pollution Incident Response Management Plan (PIRMP) has been developed to outline our response to any pollution incidents. It has been prepared in accordance with the “*Protection of the Environment Operations Act 1997*” (POEO Act) and the “*Protection of the Environment Legislation Amendment Act 2011*” (POELA Act). The EPA defines a pollution incident as: “*an incident or set of circumstances during or as a consequence of which there is, or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.*”

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

- (a) Harm to the environment is material if:
 - (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

For the purpose of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

LINKS TO OTHER EMERGENCY PLANS

As detailed above this document is tailored to meet the requirements under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) to prepare, keep, test and implement a pollution incident response management plan. However, this document is not a stand-alone document, and should be read in conjunction with the PBM Emergency Plan which contains further and more detailed documentation on emergency planning and response procedures.

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POTENTIAL POLLUTION HAZARDS [Clause 98C (1) (a) and (b)]

Potential pollution hazards identified at PBM include:

- Air Pollution Incident – excessive dust emissions, uncontrolled release of gas to atmosphere, smoke.
- Water Pollution Incident – discharge of sediment, discharge of chemicals or fuel, failure of effluent containment system.
- Land Pollution Incident - discharge of chemicals or fuel, failure of effluent containment system.
- Fire – endangering environment, human health and/or property.

PRE-EMPTIVE ACTIONS TO BE TAKEN [Clause 98C (1) (c)]

PBM undertakes numerous measures to reduce the likelihood and consequence of the potential of pollution incidents on site. The pre-emptive actions listed below reduce the likelihood of pollution incidents to Low. These actions include the following:

- Training - site Inductions, use of spill containment and firefighting equipment, mock incident response exercises, hazard identification and risk management.
- Bunding - all fuels and chemicals stored on site are contained within bunded areas
- Planning tools - Safety Management Plan, Environmental Management Strategy and associated sub-management plans for Water, Air, Noise, Blasting, Transport and Rehabilitation & Landscape.
- Inspections -regular site inspections, monitoring and auditing of site environmental controls.
- Pollution incident response equipment - spill kits, water carts, emergency response equipment.
- Preventative Maintenance on all plant and equipment.
- Regular removal of waste from site - general waste by contractor, effluent tank pump out by contractor, waste oils by contractor, waste laboratory chemicals sent back to supplier.
- Structural controls - drainage channels, rock lined dams, bunding, sediment basins, earth banks, vegetation buffer / infiltration areas.
- 24 hour CCTV for site security.
- Monthly swipe test of Troxler Sealed Source Device Dosimeters.
- Vehicle placarding when carrying Dosimeters.
- License to carry Dosimeters.

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INVENTORY OF POLLUTANTS [Clause 98C (d) and (e)]

Below is a summary of the main chemicals held onsite.

| Product Name | Maximum Quantity | Storage Location | Method of Storage |
|----------------------------------|------------------|---|--|
| Diesel | 55000L | SA1 Diesel SA4 Asphalt. SA5 Pugmill | Tanks / IBC in bunded area |
| LPG | 98000L | SA2 LPG SA3 Lab SA6 Workshop | LPG Gas tank / chained to shed / trolley |
| 10w30 | 5L | SA3 Laboratory | Chemical storage cabinet |
| Absolute Alcohol | 20L | SA3 Laboratory | Chemical storage cabinet |
| Barium Chloride | 500g | SA3 Laboratory | Chemical storage containers |
| Cloudy Ammonia | 1L | SA3 Laboratory | Chemical storage cabinet |
| Hydrochloric Acid | 25L | SA3 Laboratory | Chemical storage containers |
| Kerosene | 1L | SA3 Laboratory | Chemical storage cabinet |
| Sodium Hexametaphosphate | 5kg | SA3 Laboratory | Chemical storage containers |
| Sodium Hydroxide | 500g | SA3 Laboratory | Chemical storage containers |
| Sodium Sulphate | 50kg | SA3 Laboratory | Chemical storage containers |
| Sulphur (capping sulphur) | 40kg | SA3 Laboratory | Chemical storage containers |
| Tannic Acid | 500g | SA3 Laboratory | Chemical storage containers |
| WD-40 Silicone | 200g | SA3 Laboratory | Chemical storage cabinet |
| Zinc Chloride Anhydrous | 4kg | SA3 Laboratory | Chemical storage containers |
| Asphaltic Concrete (AC) | Varies | SA4 Asphalt | Asphalt Hopper |
| Aviation Fuel | 205L | SA4 Asphalt | Drums in bunded area |
| Bio Active Absorbent | 10kg | SA4 Asphalt | Spill Kit in bunded area |
| Bitumen AR450 | 60000t | SA4 Asphalt | Within Plant & tanks in bunded area |
| Enviroslip | 800L | SA4 Asphalt | Drums on IBC Pallet Bund |
| Ethanol - denatured | 1000L | SA4 Asphalt | Drums in bunded area |
| Heat Transfer Oil B | 1000L | SA4 Asphalt | Drums in bunded area |
| Polypropylene White Oil | | SA4 Asphalt | Spill Kit in bunded area |
| Toluene | 1000L | SA4 Asphalt | Drums in bunded area |
| Lime - slag 85/15 | 25t | SA5 Pugmill | Silo |
| 2 Stroke Greenkeepers Engine Oil | 5L | SA6 Workshop | Drums in bunded area |
| 285 S T Epoxy Part A | 100L | SA6 Workshop | Drums in bunded area |
| 390 Enamel | 4 x 20L | SA6 Workshop | Drums in bunded area |
| AC55 Solvent | 80L | SA6 Workshop | Drums in bunded area |
| Acetylene | 2 x 50L (G Size) | SA6 Workshop | Chained to wall/ trolleys |
| Agritrans UTTF | 20L | SA6 Workshop | Drums in bunded area |
| Argon | 2 x 50L (G size) | SA6 Workshop | Gas storage area chained to workshop |
| Argoshield | 2 x 50L (G Size) | SA6 Workshop | Chained to wall/ trolleys |
| Clytech 70 | 2 x 205L | SA6 Workshop | Drums in bunded area |

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| Product Name | Maximum Quantity | Storage Location | Method of Storage |
|-------------------------------|---------------------|------------------|--------------------------------------|
| Conseal touch up | 2 x 20L | SA6 Workshop | Drums in bunded area |
| Decorative Concrete Sealer | 20L | SA6 Workshop | Drums in bunded area |
| Envirodye (Marking Dye) | 5L | SA6 Workshop | Drums in bunded area |
| Gear Lube 85w40 | 2 x 20L | SA6 Workshop | Drums in bunded area |
| Gear Oil 75w90 Low VIS | 2 x 20L | SA6 Workshop | Drums in bunded area |
| Glyphosate 360 | 20L | SA6 Workshop | Drums in bunded area |
| Hardtop AS-HB-Ultra-FC | 1L | SA6 Workshop | Drums in bunded area |
| Hardtop Ultra Comp A | 4 X 5L | SA6 Workshop | Drums in bunded area |
| Hydrochloric Acid | 5L | SA6 Workshop | Drums in bunded area |
| Industrial Gear Oil 150 | 2 x 205L | SA6 Workshop | Drums in bunded area |
| Industrial Gear Oil 220 | 2 x 205L | SA6 Workshop | Drums in bunded area |
| Jotacote 605 Fast Cure | 10 x 20L | SA6 Workshop | Drums in bunded area |
| Metsulfuron-methyl | 500g | SA6 Workshop | Drums in bunded area |
| Oxygen | 2 x 50L (G size) | SA6 Workshop | Gas storage area chained to workshop |
| Petrol | 205L | SA6 Workshop | Drums in bunded area |
| Q Wash | 1000L | SA6 Workshop | IBC in bunded area |
| R134A Refrigerant | 20kg | SA6 Workshop | Gas storage cylinder |
| Red Rubber Grease GRR(B) | 500g | SA6 Workshop | Drums in bunded area |
| Roadranger SAE 50 | | SA6 Workshop | Drums in bunded area |
| Spraying Enamel Quick Dry 480 | 24 x 300g | SA6 Workshop | Drums in bunded area |
| Stoody 965-G | 4 x 16kg | SA6 Workshop | Boxes in bunded area |
| Superdraulic 68 | 1000L | SA6 Workshop | IBC in bunded area |
| Syn Torque 50 | 20L | SA6 Workshop | Drums in bunded area |
| Thinner No. 7 | 2 x 20L | SA6 Workshop | Drums in bunded area |
| Trans-hydraulic Fluid | 20L | SA6 Workshop | Drums in bunded area |
| Turboil 40 | 2 x 20L | SA6 Workshop | Drums in bunded area |
| Valplex EP Grease | 180kg | SA6 Workshop | Drums in bunded area |
| WD-40 Aerosol | 20L | SA6 Workshop | Drums in bunded area |
| Yellow Olive 390 Enamel | 4 x 20L | SA6 Workshop | Drums in bunded area |
| Zinc Free Superdraulic | 2 x 205L | SA6 Workshop | Drums in bunded area |
| Flyash | 1000t | SA7 Wetmix | Silo |
| Lime - hydrated | 100t | SA7 Wetmix | Silo |

Table 1: Summary of hazardous substances on site.

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SAFETY EQUIPMENT [Clause 98C (1) (f)]

Safety Data Sheets (SDS) are held in the closet crib room to the storage location of the chemicals. An electronic and hard copy of each SDS is held in the main office.

Spill kits are available throughout the site at the point of storage for hazardous substances and fuels (see Appendix 2 – Maps - Emergency Site Plan.)

Personal Protective Equipment (PPE) is provided for the handling of hazardous chemicals where required by the SDS.

Plant and equipment are available to create additional bunding in the event of significant sediment runoff or a fuel spill using material available on site.

Fire fighting equipment is available throughout the site (see Appendix 2 – Maps - Emergency Site Plan.)

CONTACT DETAILS AND RESPONSIBILITIES (Clause 98C(1)(g) & (h))

| Name / Position | 24 hour contact number | Authority |
|---------------------------------------|------------------------|---|
| Charlie Kennett General Manager | 0428 684 115 | Is authorised to notify all the relevant authorities or delegate such authority where appropriate |
| Steve Shearman PBM Site Supervisor | 0428 684 011 | Is responsible for activating and managing the PIRMP at Possum Brush Quarry |
| Stacey Tyack QSE Manager | 0428 684 547 | Is responsible for reviewing and testing the PIRMP. |
| All personnel | n/a | Are responsible for notifying the General Manager of any pollution incidents as defined in "Introduction" |

Table 2: Emergency Contact Details

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DUTY TO NOTIFY RELEVANT AUTHORITIES [Section 148 of POEO Act 1997]

Industry is now required to report pollution incidents *immediately* to **all** relevant authorities listed below. 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

The General Manager or delegate is responsible for notifying incidents immediately to the required relevant authorities. This notification shall include:

- Time, date and location of the incident.
- The circumstances in which the incident occurred (including the cause if known).
- Any actual or likely effect(s) of the incident on health or environment.
- Actions taken to contain or mitigate the outcome of the incident.
- Long term actions to prevent a re-occurrence.

The following authorities must be notified in the order presented below:

In the event of immediate threat to human life, human health or property:

| | | |
|---|--------------------|-----|
| 1 | Emergency Services | 000 |
|---|--------------------|-----|

Following a call to "000" or where a call is not required:

| | | |
|---|--|--------------|
| 2 | NSW EPA | 131 555 |
| 3 | MidCoast Council | 02 6591 7222 |
| 4 | NSW Public Health Unit | 1300 066 055 |
| 5 | NSW WorkCover | 13 10 50 |
| 6 | Fire and Rescue NSW (unless "000" was the first call made) | 1300 729 579 |
| 7 | NSW Department of Industry | 1300 814 609 |

Table 3: Notification of External Authorities

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or WHS legislation.

Where requested by an external authority, in writing, Pacific Blue Metal will provide a written Incident Investigation report to the extent required by law.

COMMUNICATING WITH NEIGHBOURS & THE LOCAL COMMUNITY

[Clause 98C(1) (i)]

Each incident will be assessed for its potential to have a direct impact on surrounding neighbours and the local community.

At present, there are no premises such as schools or hospitals, in close proximity to the Quarry, which would require notification of a pollution incident.

For major pollution incidents, the General Manager (or delegate) will be advised by the attending Emergency Services of the manner and extent to which neighbours are to be notified. A database of neighbour contact details is held at the Company's office to aid this process.

When the incident has been contained, the General Manager will provide a final update to all affected residents and community members. This will include the following information:

- Time, date and location of the incident.
- The circumstances in which the incident occurred (including the cause if known).
- Any actual or likely effect(s) of the incident on health or environment.
- Actions taken to contain or mitigate the outcome of the incident.
- Long term actions to prevent a re-occurrence.

For minor pollution incidents, neighbours and local community will be notified by email or through the next Community Representative Meeting.

MINIMISING HARM TO PERSONS ON THE PREMISES [Clause 98C (1) (j)]

In the event of a pollution incident, the General Manager, Site Supervisor or their delegate, will initiate the Emergency Evacuation Plan, using UHF Channel 12 and the following phrase:

“EMERGENCY EMERGENCY EMERGENCY” then state the **type of emergency, location, any injuries, type of help required and if an emergency evacuation is required.**

In the event an evacuation is required, all site personnel will make their way to the Emergency Assembly point located near the weighbridge site office (see Appendix 2 – Maps - Emergency Site Plan.)

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Should the need for expert opinions arise, the following consultants are available to the company:

Medical Consultant

Dr Nael Hessain, Nabiac Street Nabiac Ph: 02 6554 1150

Environmental Consultant

R.W. Corkery & Company Pty Limited Ph: 02 6362 5411

MAPS [Clause 98C (1) (k)]

Appendix 2 – Maps - Area Likely to be affected by a pollution incident, shows this area in relation to the location of the quarry.

Appendix 2 – Maps - Emergency Site Plan details the location of potential pollutants on site, as well as the location of pollution incident response equipment. There are no stormwater drains on site however the location of dams and potential stormwater run off direction is indicated on the map.

ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT [Clause 98C (1) (l)]

During a pollution incident response, priority will be given to preservation of human life and health. Following which, containment of the incident is the next priority. Concurrently the duty to notify relevant authorities will take effect.

The following are examples of actions that will be taken in response to a pollution incident.

This list is not exhaustive and other actions will be taken as and when necessary:

- Notify neighbours and community.
- Spills – deploy spill containment equipment, shut down any affected equipment, evacuate as required.
- Fire –shut down equipment and deploy fire fighting equipment, evacuate as required.
- Air pollution – shut down any equipment involved, evacuate as required.
- Follow the direction of any attending emergency services.
- Seek advice when required on pollution incident clean up.
- Use trained contractors for cleanup and disposal of contaminated waste.
- Investigate the incident and implement future preventative actions accordingly.

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STAFF TRAINING [Clause 98C (1)(m)]

All personnel are trained in emergency response procedures. Initial training takes place as part of the Site Induction for new personnel, subcontractors and visitors, this includes reference to the prevention of noise, dust, water, waste and hydrocarbon pollution as well as and hazard reporting and risk management. Follow up training is provided such as toolbox talks for specific site issues, review of any pollution incidents, emergency response updates and task specific pollution risks and controls.

TESTING OF THE PIRMP [Clause 98C (1) (n), (o) and (p), 98C(2)(f) and (g), 98E(1) and 98E(2)]

The PIRMP is tested at least annually and a record of the test kept in Appendix 1 - Revision and Testing. This record shows the date of testing, method of testing, the results and who was involved in the process. Testing shall be by practical exercises, such as a mock pollution incident, or by desktop simulation and/or review.

REVIEW OF PIRMP

The PIRMP will be reviewed and updated annually following the testing mentioned above. Other events which may trigger an earlier review are in the case of a significant operational change, legislative changes or following activation of the PIRMP in response to a pollution incident.

AVAILABILITY OF PIRMP

A hardcopy of the PIRMP is kept on file at the relevant site and is also made available on the company's server.

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APPENDIX 1 – REVISION AND TESTING OF THE PIRMP

REVISION TABLE

| Version Nbr. | Date | Description of amendments | Reviewed By | Approved By |
|--------------|------------|--|----------------|-----------------|
| 1.00 | 30/7/2013 | Initial Release | Alison Burgess | Charlie Kennett |
| 2.00 | 28/11/2013 | Amended to comply with EPA Audit results | Lisa Lyle | Charlie Kennett |
| 3.00 | 04/06/2015 | Review prompted by PBM Laboratory Fire. Updated Inventory of Pollutants. | Stacey Tyack | Charlie Kennett |
| 4.00 | 16/08/2016 | Updated names and phone numbers of relevant Authorities. Updated the Inventory of Pollutants and Emergency Site Plan to include the identity of new storage areas as defined in Hazardous Substances Manifest. | Stacey Tyack | Charlie Kennett |
| 5.00 | 08/08/2017 | Updated pre-emptive actions to include a reference to new Environmental Management Strategy and management plans for Water, Air, Noise, Transport, Blasting and Rehabilitation & Landscape. | Stacey Tyack | Charlie Kennett |
| 6.00 | 15/08/2018 | Amendments as per Testing Record date 15/08/18. | Stacey Tyack | Charlie Kennett |

TESTING RECORD

| Test Date | Method of Testing | Results of Test (including amendments to PIRMP) | Person(s) Who Tested the PIRMP | Approved By |
|------------|--------------------|---|---|-----------------|
| 22/11/13 | Desktop simulation | Simulated desktop event included fire, spill including community notification, checking contact numbers for relevant authorities and neighbours. Audited PIRMP against criteria in EPA "Environment Compliance Report: Requirements for Preparing and Implementing Pollution Incident Response Management Plans" Dated September 2013. | Lisa Lyle | Charlie Kennett |
| 18/03/2015 | Pollution incident | 18/03/15 Successful activation and implementation of PIRMP in response to the PBM Laboratory Fire. 10/07/15 PIRMP amended as follows: Duty to Notify clarified; Inventory of Pollutants updated; for major pollution incidents, the attending Emergency Services will determine the manner and extent to which neighbours are notified | Incident: Roger Albans Paul Curran Rob McCabe Jason Fardell Miguel Saunders Steve Shearman Review: Stacey Tyack | Charlie Kennett |
| 16/08/2016 | Desktop Simulation | Simulated desktop emergency event of large hydrocarbon spill. Assessed Emergency Response Procedures, Emergency Services Listings and contact names/numbers for relevant authorities. Checked contents and location of spill kits as well as staff members' knowledge on use of spill kits. Checked other hazardous chemicals in the vicinity of the hydrocarbon storage area. Checked EPA website for PRIMP updates. | Stacey Tyack | Charlie Kennett |
| 08/08/2017 | Desktop Review | Reviewed entire plan for currency and adequacy for forth coming year, including: <ul style="list-style-type: none"> • Listing of main chemicals on site • Emergency response contact details • Potential Pollution hazards • Preemptive actions • Checked EPA website including PIRMP FAQ page (last updated 13 October 2016) for amendments / changes that may be required. | Stacey Tyack | Charlie Kennett |

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| | | | | |
|----------|----------------|--|--------------|-----------------|
| 15/08/18 | Desktop Review | Full review of plan contents. Amended as follows: <ul style="list-style-type: none">• Added new section 'Link to Other Emergency Plans'.• Review of outcomes from mock pollution incident held 14/08/18 (amendments made to Emergency Plan V1.02)• Added additional 24hr emergency contact.• Updated Table 1: Summary of hazardous substances on site.• Updated emergency map to include most recent aerial imagery.• Checked EPA website including PIRMP FAQ page (last updated 20 August 2017) for amendments / changes that may be required. | Stacey Tyack | Charlie Kennett |
|----------|----------------|--|--------------|-----------------|

APPENDIX 2 - MAPS

Area Likely to be affected by a pollution incident

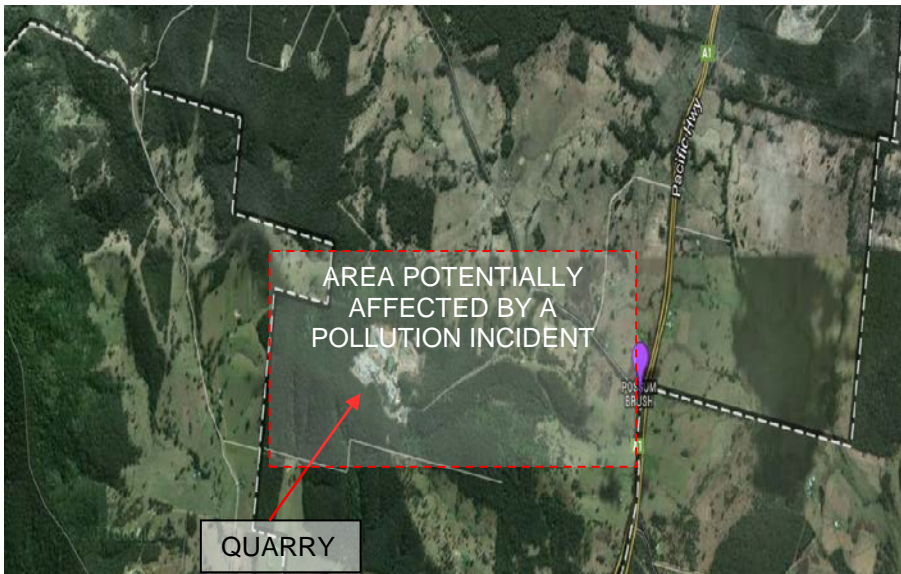


Figure 1: Area likely to be affected by a pollution incident





PACIFIC BLUE METAL

Emergency Site Plan

Name of premises: Pacific Blue Metal
 Address: 113 Possum Brush Rd
 POSSUM BRUSH NSW 2430
 Date of plan drawing: 8 March 2016
 Date of last revision: 4 September 2018

EMERGENCY ASSEMBLY POINT





DANGER
FUEL STORAGE



CAUTION
CHEMICAL STORAGE AREA

**HAZARDOUS CHEMICAL
 MANIFEST STORED IN
 HAZMAT CYLINDER
 AT FRONT GATE**

Figure 2: Emergency Site Plan