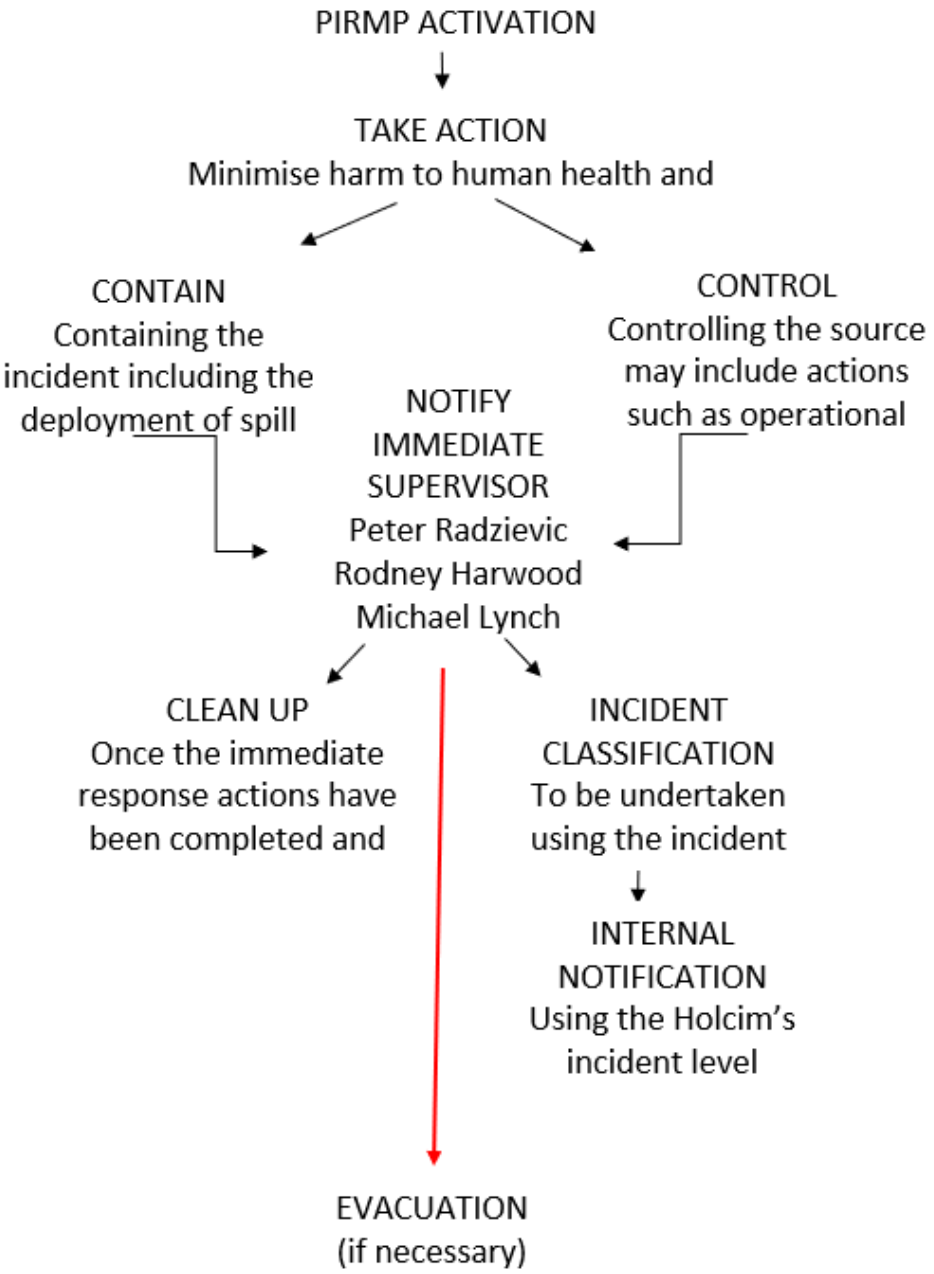
2023 Salt Ash Quarry Pollution Incident Response Management Plan

Salt Ash Quarry Pollution Incident Response Management Plan (PIRMP)

Revision/ Checking History

Revision Number	Date	Checked by	Issued by
1	30/10/2020	**Shilpa Shashi**– NSW/ACT Planning & Environment Coordinator **Michael Lynch** – HSEQ Coordinator **Peter Radzievic** – Quarry Manager	Shilpa Shashi
2	23/08/2021	**Shilpa Shashi**– NSW/ACT Planning & Environment Coordinator **Michael Lynch** – HSEQ Coordinator **Peter Radzievic** – Quarry Manager	Shilpa Shashi
3	06/07/2022	**Shilpa Shashi**– NSW/ACT Planning & Environment Coordinator **Michael Lynch** – HSEQ Coordinator **Peter Radzievic** – Quarry Manager	Shilpa Shashi
4	30/11/2022	**Rob Townsend** – Acting Environment Manager NSW **Michael Lynch** – HSEQ Coordinator **Peter Radzievic** – Quarry Manager	Rob Townsend
5	16/11/2023	**Peter Radzievic** – Quarry Manager	Dozie Egeonu

Flow Chart


PIRMP ACTIVATION
TAKE ACTION
Minimise harm to human health and
CONTAIN
Containing the incident including the deployment of spill
CONTROL
Controlling the source may include actions such as operational
NOTIFY IMMEDIATE SUPERVISOR
Peter Radzievic
Rodney Harwood
Michael Lynch
CLEAN UP
Once the immediate response actions have been completed and
INCIDENT CLASSIFICATION
To be undertaken using the incident
INTERNAL NOTIFICATION
Using the Holcim's incident level
EVACUATION
(if necessary)

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Appendices

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 **Salt Ash Quarry**, 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 Salt Ash Quarry.

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: **Peter Radzievic** - Quarry Manager
2) Notifying and coordinating relevant authorities: **Peter Radzievic** – Quarry Manager
3) Implementation and management of this document: NSW/ACT Planning & Environment Coordinator
4) Annual review and testing of PIRMP – **Peter Radzievic** - Quarry 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 under "Site PIMRPs 2022" and Salt Ash Quarry Site folder.

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 – Attachment 6.2F

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

Table 2: Holcim SHE Likelihood & Risk Score Matrix

Step 3 - Determine Risk Rating from the Risk Matrix					
	Consequences				
RISK RATING	**5. Disaster**	**4. Severe**	**3. Serious**	**2. Significant**	**1. Minor**
A. **Certain**	HIGH	HIGH	HIGH	MEDIUM	MEDIUM
B. **Likely**	HIGH	HIGH	MEDIUM	MEDIUM	LOW
C. **Possible**	HIGH	MEDIUM	MEDIUM	LOW	LOW
D. **Unlikely**	MEDIUM	MEDIUM	LOW	LOW	LOW
E. **Rare**	MEDIUM	LOW	LOW	LOW	LOW

Table 3: 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	Possible	Serious	Medium	▪ Complete monitoring & assess results monthly ▪ Review results & monitoring program quarterly ▪ Water carts/spraying ▪ Apply crusting agents to surface of stockpiles of fine materials ▪ Minimise disturbed areas ▪ Stop dust generating activities as necessary ▪ Progressively rehabilitate disturbed areas ▪ Modify works during periods of high wind ▪ Dust minimisation training ▪ Maintenance of dust control equipment ▪ Engineering controls for discharge of fine materials to stockpiles ▪ Engineering controls for dust emissions from the material processing plant	Unlikely	Significant	Low
2	Health issues off site	Rare	Severe	Low	▪ As per (1) ▪ Complaints hotline ▪ Assess monitoring results	Rare	Serious	Low
Groundwater								

Key Environmental Hazards		Risk			Mitigation Measures	Revised Risk		
		L	C	R		L	C	R
1	Groundwater contamination	Unlikely	Serious	Low	▪ Implement Monitoring and response plan ▪ Review monitoring results annually & action as necessary ▪ Ensure storage, handling and transport of dangerous goods are conducted in accordance with Australian Standards ▪ Identify, classify, quantify & appropriately store hazardous waste ▪ Develop & implement oil & fuel spillage controls ▪ Ensure hazardous waste is minimised ▪ Licenced contractors to remove hazardous waste from site ▪ Keep records of all hazardous waste movements ▪ Implement bunding to appropriate areas ▪ Ensure adequate spill kits are available on site including adequate training ▪ Minimise hazardous waste storage quantities on site	Rare	Serious	Low
2	Lowering of groundwater table	Rare	Serious	Low	▪ Monitor & report on ground water levels ▪ Comply with Water Management Plan water balance	Rare	Significant	Low
Surface Water								

Key Environmental Hazards		Risk			Mitigation Measures	Revised Risk		
		L	C	R		L	C	R
1	Discharge of sediment	Unlikely	Serious	Low	▪ Develop & implement Water Management Plan ▪ Implement Monitoring Program ▪ Review monitoring results quarterly & action as necessary ▪ Develop & implement Surface & Groundwater Response Plan ▪ Develop & implement Erosion & Sediment Control Plan	Unlikely	Serious	Low
2	Discharge of hazardous materials	Rare	Severe	Low	▪ Ensure storage, handling and transport of dangerous goods are conducted in accordance with relevant Australian Standard ▪ Review monitoring results quarterly & action as necessary ▪ 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
Ecology								

Key Environmental Hazards		Risk			Mitigation Measures	Revised Risk		
		L	C	R		L	C	R
1	Damage to local flora	Possible	Serious	Medium	▪ Develop & implement Rehabilitation and Landscape Management Plan ▪ Monitor & report on site flora health as per consent requirements ▪ Suitable training regarding flora protection ▪ Removal of stock from sensitive areas ▪ Implement bushfire hazard reduction tasks ▪ Removal of feral animals from sensitive areas ▪ Noxious weed control in sensitive areas	Unlikely	Significant	Low
2	Damage to site fauna	Unlikely	Serious	Low	▪ As per 1 ▪ Information regarding local WIRES for distressed or injured fauna ▪ Reporting on fauna deaths ▪ Three yearly monitoring	Rare	Serious	Low
Land								
1	Spill of liquid fuel, oils, chemicals etc whilst in storage	Possible	Serious	Medium	▪ Fuels, oils, chemicals etc stored according to Holcim's bunding requirements. ▪ Measures in place to ensure spills do not leave site boundaries i.e. diverting flow away from boundaries, stormwater drains. ▪ Bunding subject to regular inspection and maintenance	Significant	Unlikely	Low

Key Environmental Hazards		Risk			Mitigation Measures	Revised Risk		
		L	C	R		L	C	R
2	Spill during delivery of fuel to mobile equipment	Possible	Serious	Medium	▪ 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 or in designated areas ▪ Drivers trained in spill response procedures.	Unlikely	Significant	Low
3	Spill during delivery of fuel to storage tank	Possible	Serious	Medium	▪ 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
4	Land contamination	Possible	serious	Medium	▪ 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:

- 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.

Refer to table 3 below for detail. 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 4: Pollutant Information Data Sheet

Pollutant	Storage Location	Current SDS held Yes/No	Emission control equipment (1)	PPE (1)	Spill Clean Up Method (1)
Fuel	South West side of the diesel tank storage area 	Yes	Sand, earth,	PVC gloves, safety glasses, goggles	**Large Spill** **Assess** Quickly assess the spill: 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? **Ensure Personal Safety** 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 **Secure** Secure the spill If hazardous to public or other staff exists Post a guard immediately Enter barricades to prevent unintended access

					Contain 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 In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment. **Prevent** Prevent spillage to stormwater drains and entry into sewer, water courses, basements or confined areas. **Absorb** 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. Recover product from the surface. Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor **Disposal** 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. Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor. 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. **<u>Reporting</u>** Incident and Corrective and Preventative action should be captured on the ICARE. **<u>Small Spill</u>** Stop leak without risk. Move containers from spill area Absorb with an inert material and place it in the appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.
Lubricants				PVC Gloves, safety glasses, goggles	**<u>Large Spill</u>** **<u>Assess</u>**

	Stored in bunded oil shed South west of diesel tank area. (see photo above)	Yes	Sand, earth, vermiculite, barrier equipment (booms, floats etc.)		Quickly assess the spill: 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? **<u>Ensure Personal Safety</u>** 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 **<u>Secure</u>** Secure the spill If hazardous to public or other staff exists Post a guard immediately Enter barricades to prevent unintended access **<u>Contain</u>** 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

					In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment. **Prevent** Prevent spillage to stormwater drains and entry into sewer, water courses, basements or confined areas. **Absorb** 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. Recover product from the surface. Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor **Disposal** 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.

					Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor. 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. **Reporting** Incident and Corrective and Preventative action should be captured on the ICARE. **Small Spill** Stop leak without risk. Move containers from spill area Absorb with an inert material and place in appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.

Vehicle fluids	Stored in bunded oil shed South west of diesel tank area. (As above)	Yes	Sand, earth, vermiculite	PVC Gloves, safety glasses	**<u>Large Spill</u>** **<u>Assess</u>** Quickly assess the spill: 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? **<u>Ensure Personal Safety</u>** 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 **<u>Secure</u>** Secure the spill If hazardous to public or other staff exists Post a guard immediately Enter barricades to prevent unintended access **<u>Contain</u>**

					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 In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment. **Prevent** Prevent spillage to stormwater drains and entry into sewer, water courses, basements or confined areas. **Absorb** 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. Recover product from the surface. Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor **Disposal**

					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. Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor. 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. **Reporting** Incident and Corrective and Preventative action should be captured on the ICARE. **Small Spill** Stop leak without risk. Move containers from spill area Dilute with water and mop up, or absorb with an inert dry material and place in appropriate waste disposal container Dispose of via a licensed waste disposal contractor.

Welding gas	Stored in the maintenance compound. Oxygen bottles are stored away from the welding area.	Yes	Ventilation	Respirator	<u>Occupational Release:</u> 1) Avoid heat, flames, sparks and other sources of ignition. 2) Stop leak if possible without personal risk. 3) Reduce vapours with water spray 4) Keep unnecessary people away, isolate hazard area and deny entry. 5) Remove sources of ignition. 6) Ventilate closed spaces before entering.

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

7.3 Emergency Response Map

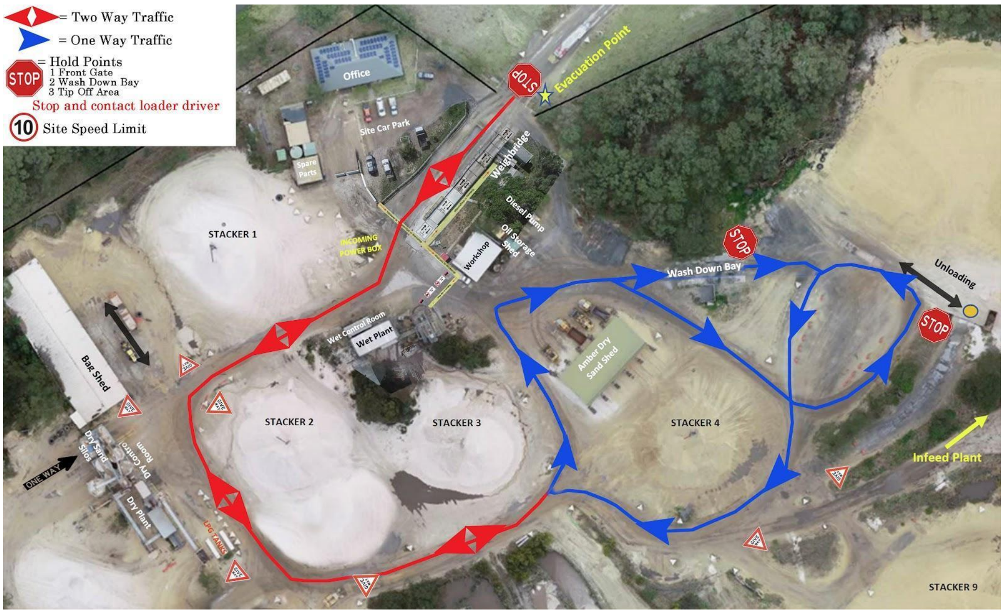
In addition to the PIDS the site needs to prepare an emergency response map that provides the following information;

- 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 coarse or water body

Existing site maps that have been developed to comply with Holcim SHE system requirement 1.84 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.

Site Maps



Salt Ash Site operational area

Salt Ash Rural Fire Station is 2.7km from the Holcim Salt Ash Site.

7.4 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:

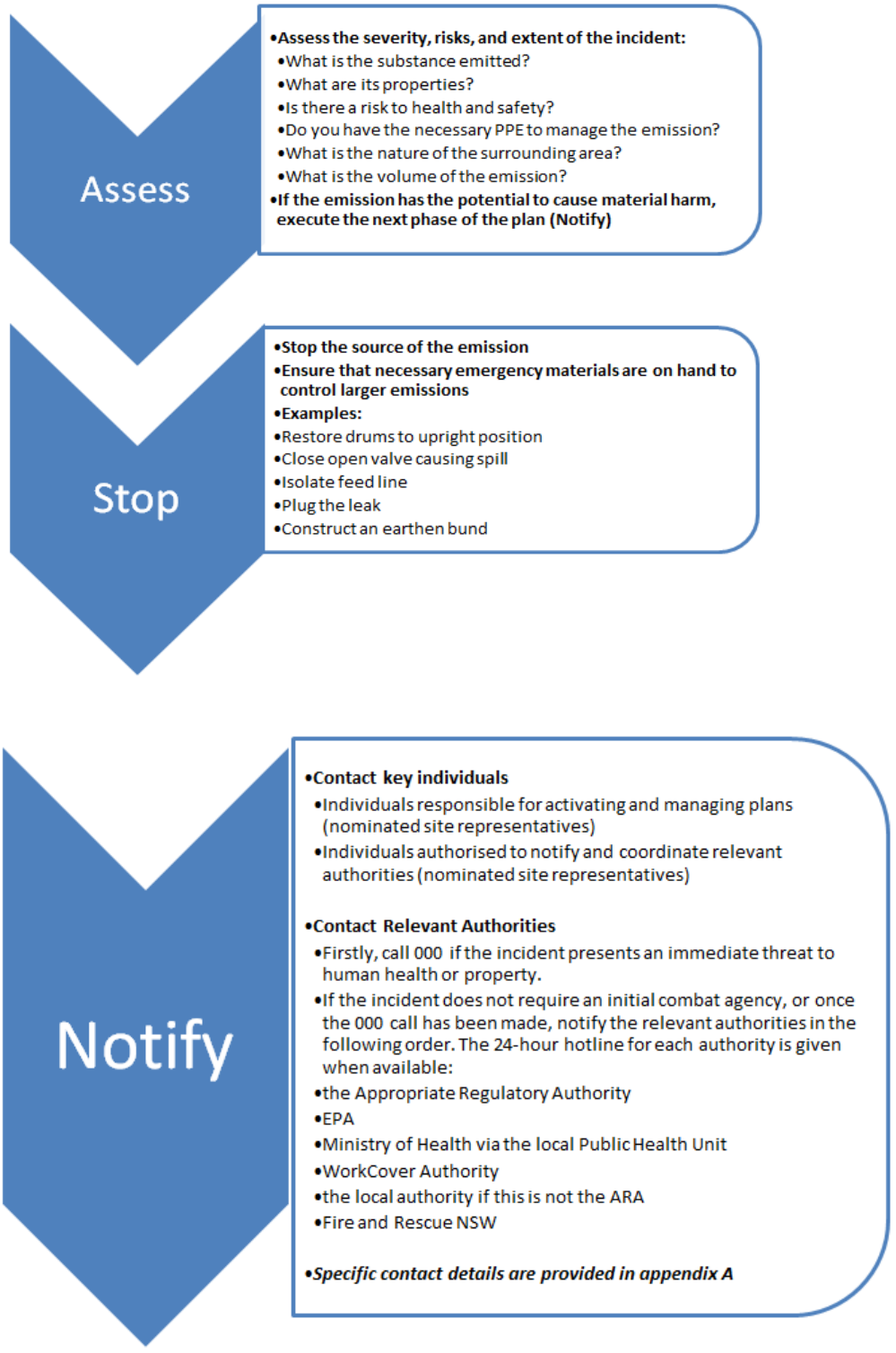
- The PIRMP will be tested annually and any identified updates or changes will be made
- The PIRMP will be tested and reviewed within one month from the date of any pollution event that triggers this PIRMP
- The review will also consist of assessment of any additional hazards and control measures
- In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

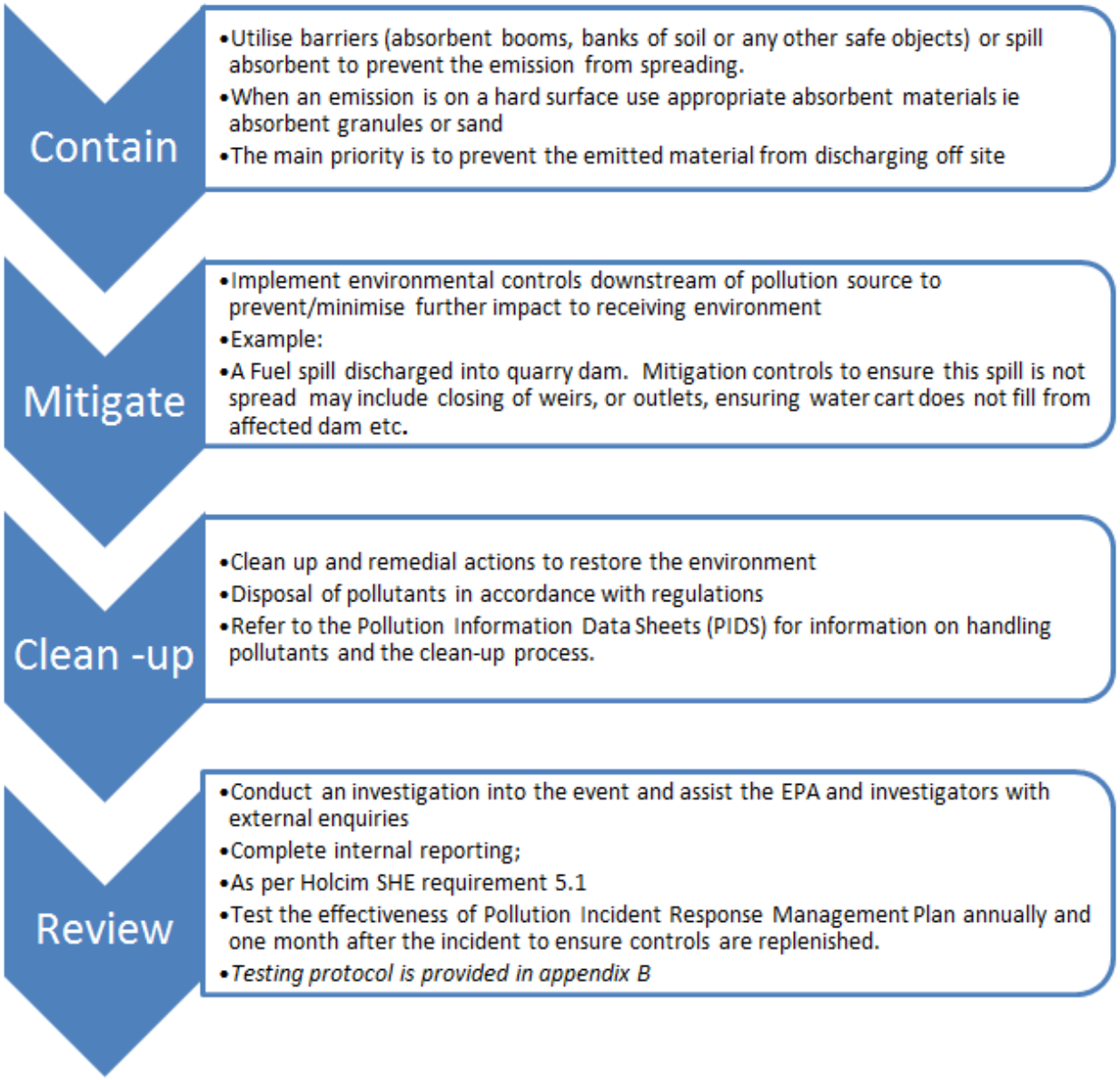
7.5 Typical Holcim Response process

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 in the following page.


Assess
•Assess the severity, risks, and extent of the incident:
•What is the substance emitted?
•What are its properties?
•Is there a risk to health and safety?
•Do you have the necessary PPE to manage the emission?
•What is the nature of the surrounding area?
•What is the volume of the emission?
•If the emission has the potential to cause material harm, execute the next phase of the plan (Notify)
Stop
•Stop the source of the emission
•Ensure that necessary emergency materials are on hand to control larger emissions
•Examples:
•Restore drums to upright position
•Close open valve causing spill
•Isolate feed line
•Plug the leak
•Construct an earthen bund
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*

7.6 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 have been affected by an incident.

Communicating with neighbours and the community in the event of a spill 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 can include neighbouring residential and/or commercial properties, sensitive receivers i.e. farms, hospitals, schools etc. 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

8. Staff Training

Sites need to develop a toolbox talk based on the PIRMP. This training should be delivered to all appropriate personnel on site.

Frequency of training

Training should be repeated annually, and after each update.

How Records of training are kept

Training records should be stored on site and in the Chris 21 database. The records are to be made available to relevant authorities on request.

9. 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
- 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 safel\

Appendix A - Emergency Contact Details

Salt Ash Emergency Management Contact List

❖ **UPON HEARING THE EMERGENCY ALARM, YOU WILL NEED TO EVACUATE:**

❖ **ASSIST ANYBODY IN IMMEDIATE DANGER ONLY IF SAFE TO DO SO.**

EMERGENCY NUMBERS FOR POLICE, FIRE, AMBULANCE – 000

Emergency Services	Comments / links	Phone
Police	Local Contact - Lemon Tree Passage	**4982 4753**
Police	Local Contact - Raymond Terrace	**4983 7599**
Police	Local Contact – Nelson Bay	**4981 1244**
Fire and Ambulance	Emergency	**000**
Hospital	Local Contact - Mater Hospital	**4921 1211**
Hospital	Local Contact – John Hunter Hospital	**4921 3000**
Hospital	Local Contact – Tomaree Community Hospital, Nelson Bay	**4984 0700**
SES	Emergency Contact Only	**132 500**
SDS	Emergency Advice: ACOHS ERS (24 Hours)	**1800 638 556**
WorkCover	Emergency Contact & Advice	**131 050**
Port Stephens Council	Raymond Terrace Office	**4988 0255**
Poisons Information	24 Hour Telephone Advice	**131 126**
Elgas	Emergency Contact Only	**1800 819 783**
Electricity	Ausgrid	**131 388**
Hunter Water Corporation	General	**1300 657 000**
EPA	Pollution Hotline	**131 555**
EPA	Newcastle	**4908 6800**

Holcim Contacts	Full Name	Phone	Mobile
Quarry Manager	Peter Radzievic	(02) 4982 6399	**0419 440 588**
Quality, Safety & Environmental Coordinator	NA		
Safety Manager - NSW Aggs	Edward Richardson	(02) 42567241	**0429 791 682**
Environment Manager – AUS/NZ	Dozie Egeonu		0429557493
Operations Manager - N.S.W Aggs	Chris Hamilton	(02) 6656 8620	**0429 790 213**
Crisis Management Team	**Full Name**	**Phone**	**Mobile**

Quarry Manager	Peter Radzievic	(02) 4982 6399	**0419 440 588**
Emergency Leader	Peter Radzievic	(02) 4982 6399	**0419 440 588**
Communications Coordinators	Roslyn Merrick	(02) 4982 6399	**0402 002 89 4**
	Zoe Archard	(02) 4982 6399	**0422 330 560**
Additional Site Contacts	**Contact Name**	**Phone**	**Mobile**
Operations Coordinator	Rodney Harwood	(02) 4982 6399	**0448 682 458**
2 Way Radio Communications			
Salt Ash Plant – UHF Channel 27		Anna Bay Site – UHF Channel 27	
Northern Dune Site – UHF Channel 21			

Appendix B - Pollution Incident Response Test Checklist

Spill Scenario Checksheet

Date: 31st October 2023.

Site: SALTASH

Address: 8 Oakvale Drive SaltAsh

Brief Description of Spill Scenario:

Service of heavy Mobile Equipment (HME).
Oil spill on ground, while decanting ~~old~~ oil to machine.

Spill Response Sequence	Time Hours	Minutes
Scenario Started	11	00
Spill Discovered and Alarm Raised	11	05
Spill Assessed	11	05
Source of Spill Stopped or Restricted	11	06
Spill Contained	11	06
Spill Reported to Site Management	11	30
Spill Cleaned Up	11	07
Spill Clean Up Materials Disposed of Appropriately	11	15.

All personnel present at the time of the scenario exercise should participate.. Where personnel cannot participate, this should be noted in the comments section and their knowledge on emergency requirements should be verbally checked.

Comments / Recommendations / Review / Improvements:

Danny King (electrical contractor)
Mark Grant (Maintenance Contractor) were present at the time of the Spill Scenario.
Spill response Sequence was explained by Peter Radunic & Steve Evans.
All spill response gear was identified by all present.

Observer (name): S. EVANS Signed:

Date: 31 October 2023

Site: Salt Ash

Address: 8 Oakvale Drive Salt Ash

Pollution Incident Scenario: Oil Spill at Oil storage shed area

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	**Peter Radzievic 0419 440 588**	
Individuals Authorised to Notify and Coordinate Relevant Authorities	**Peter Radzievic 0419 440 588**	
Emergency Services	**000**	
EPA	**131 555 4908 6800**	
The Ministry of Health via the local Public Health Unit	**2278-2338**	
WorkCover Authority	**131 050**	
Local Council	**4988 0255**	
Fire and Rescue NSW	**000**	

Additional Contacts relevant to the licensee's premises	**Neighbours** **4982 6222** **4982 6227** **0408 490 911**	
Other Organisations or agencies that need to be advised of the incident	**Chris Hamilton** **0429 790 213**	

Environmental Hazards and Control Standards	**Yes/ No**	**Actions**
Are the descriptions of environmental hazards up to date?	Yes	
Are the potential and likelihood of incidents that could occur still correct and relevant to the site operations?	Yes	
Are the pre-emptive actions for risk management of the relevant activity correct and relevant to the site?	Yes	
Is there an inventory of pollutants (including quantities of pollutants onsite)?	Yes	
Is the listed safety equipment & PPE correct and up to date?	Yes	
Is there a map/s located onsite detailing the following; - The site and the surrounding area likely to be affected in the event of an incident - The Locations of storage/ holding points of pollutants	Yes	
Are the nature and objectives of staff training set out in the plan?	Yes	
Are there details of mechanisms for providing early warnings and regular updates to the owners and occupiers?	Yes	
Is there a copy of the plan onsite and up to date?	Yes	

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

Date: 31/10/2023

Notes:

Improvements to the Pollution Incident Response Management Plan:

1.) No improvements or recommendations came out of the mock spill response from any of the participants.

Comments / Recommendations / Review

1.) Review descriptions of environmental hazards and update as required

2.) The quantities of pollutants on site check inventory of pollutants and update as required?

Pollution Incident Response Test Checklist Assessor: Peter Radzievic

Signed:

Appendix C – Community Notification Strategy

- In an emergency if the spill has the potential to cause harm to the following stakeholders they will be contacted by telephone or alternatively in person.

Neighbour 3 Oakvale Dr, Salt Ash NSW 2318	Oakvale Wildlife Park Kent & Leanne Sansom	4982 6222
Neighbour 2684 Nelson Bay Rd, Salt Ash NSW 2318	Mackas Sand Bruce MacKenzie	4982 6227
Neighbour Oakvale Dr, Salt Ash NSW 2318	Robert MacKenzie	0408 490 911