



Premise

Toogong Gravel Quarry

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

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Isaac Westcott		Brendan Stuart	Brendan Stuart

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1. INTRODUCTION

1.1 Scope

A Pollution Incident Response Management Plan (PIRMP) is required by all projects that hold an Environmental Protection Licence (EPL) prior to commencement of operations. The requirements were introduced through amendments to the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009*, (POEO(G) Regulation).

This PIRMP applies to the Toogong Gravel Quarry (EPL No. 21151).

The objective of the PIRMP is to document the processes required to prepare for and respond to pollution incidences at Toogong Gravel Quarry. The plan describes potential hazards, control measures to prevent environmental harm, and notification requirements in the event of a pollution incident.

This PIRMP has been prepared in accordance with the above legislative articles and reflects the requirements specified in the NSW Environment Protection Authority's (EPA's) document Guideline: *Pollution Incident Response Management Plans*, March 2020.

Specifically, this PIRMP details:

- Procedures for notifying a pollution incident to relevant persons;
- Actions to be taken to reduce and/or control pollution; and
- Procedures for co-ordinating those notified and any action taken in combating the pollution.

1.2 Site Overview

Table 1 – Particulars of Licenced Premises

Item	Description
Licenced Premise	Toogong Gravel Quarry
Address and Location	PO BOX 4783 CUDAL NSW 2864 4783 Escort Way, Cudal, NSW 2864 "Derowie" Part Lot 2, Deposited Plan 585289
EPL and Licenced Activities	EPL: # 21151 Scheduled Activity: Extractive activities Fee Based Activity: Land-based extractive activity Scale: > 30000 - 50000 T annual capacity to extract, process or store

1.3 Regulatory Requirements

Part 5.7A of the POEO Act requires all licensees to prepare, keep, test and implement a PIRMP. Part 3A of the General Regulation sets out the specific information a licensee must include in their PIRMP. In summary, the requirements are:

- All licensees must prepare a PIRMP (section 153A).
- A PIRMP must be in the form required by the regulations and must include the information detailed in the POEO Act (section 153C) and the General Regulation (clause 98C).
- Licensees must keep the PIRMP at the premises the environment protection licence relates to, or where the relevant activity takes place (in the case of trackable waste transporters and mobile plant) (section 153D), and make certain parts of the PIRMP available on a publicly accessible website of the licensee, or alternatively provide a copy upon written request (clause 98D).
- Licensees must test their PIRMP in accordance with the regulations (section 153E and clause 98E).
- Licensees must implement their PIRMP immediately if a pollution incident occurs that causes or threatens material harm to the environment (as defined in section 147) (section 153F).

1.4 Availability of PIRMP

This PIRMP is required under clause 98B(1) and 98D(1) of the POEO(G) Regulation to be:

- in written form (in case of the event of power or telecommunications failure), and
- available at the premises so it can be provided to an authorised EPA officer on request.

1.5 Roles and Responsibilities

During normal working hours the facility is staffed by qualified and experienced personnel. These include a Site Supervisor and Site Manager.

At least one of the Site Supervisor or Site Manager are generally present during normal working hours. Responsibilities include response to alarms, fault identification and general troubleshooting. An inspection is performed at least once a working day to check the quarry is operating effectively and efficiently.

Table 2 – PIRMP Roles and Responsibilities

Role	PIRMP Responsibilities	Contact
Site Manager	<ul style="list-style-type: none">• Activating the PIRMP, as necessary• Notify relevant authorities• Managing the response to a pollution incident	Jock Gordon 0418 963 565
Site Supervisor	<ul style="list-style-type: none">• Activating the PIRMP, as necessary• Managing the response to a pollution incident	Michael Hallahan 0418 245 668

1.6 Definition

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 1997:

- "(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, 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."*

2. POLLUTION INCIDENTS

This section of the PIRMP identifies potential environmental impacts associated with operating the Toogong Gravel Quarry. Potential impacts have been identified through consideration of the activities to be undertaken, as well as issues identified in the Environmental Impact Statement (R.W. Corkery & Co. 2018), and the site-specific Operational Environmental Management Plan (OEMP).

2.1 Risk Matrix

The environmental risk rating of an identified impact is measured in terms of consequence (severity) and likelihood (probability) of the event happening. The risk assessment matrix and rating is provided below.

Table 3 – Risk Assessment Matrix

		CONSEQUENCE				
		Insignificant	Minor	Moderate	Major	Catastrophic
LIKELIHOOD	• A. Rare	Low	Low	Low	High	High
	• B. Unlikely	Low	Low	Moderate	High	Very High
	• C. Possible	Low	Moderate	High	Very High	Very High
	• D. Likely	Low	Moderate	High	Very High	Very High
	• E. Almost certain	Low	Moderate	High	Very High	Very High

The qualitative measures of likelihood and consequence are shown in **Tables 4** and **5**.

Table 4 – Qualitative Measures of Likelihood

Level	Descriptor	Example description
A	Rare	Uncommon, unusual: not likely to occur within a 10 year period
B	Unlikely	Not expected to happen: may occur once every 5 to 10 years
C	Possible	Could happen: will probably occur between 1 to 5 years
D	Likely	Expected to happen: expected to occur at least once in a 6 to 12 month period
E	Almost certain	Will happen: imminent or will occur in 1 to 6 months

Table 5 – Qualitative Measures of Consequence or Impact

Level	Descriptor	Example description
1	Insignificant	Negligible impact, little disruption to normal operation, low increase in normal operation costs
2	Minor	Minor impact for small population, some manageable operation disruption, some increase in operating costs
3	Moderate	Minor impact for large population, significant modification to normal operation but manageable, operation costs increased, increased monitoring
4	Major	Major impact for small population, systems significantly compromised and abnormal operation if at all, high level of monitoring required s
5	Catastrophic	Severe impact for large population, complete failure of systems

2.2 Risk Assessment and Pre-emptive Actions

Table 6 – Hazard Action Matrix

Hazard	Likelihood	Impact	Risk Level	Contributing Factors	Pre-Emptive Actions	Incident Response Actions
Loss of diesel or oil from plant and machinery	Unlikely	Minor	Low	Poor maintenance of vehicles and machinery, and periods of high traffic flow	No storage of hazardous materials such as fuels on site Refuelling of plant and machinery to be undertaken off-site Maintaining machinery in good working order to minimise risk of spills Ensuring spill kits are accessible on both operating machinery and the site office	Deployment of spill containment equipment Shutdown of processes or equipment
Excessive dust from traffic or stockpiles	Possible	Minor	Moderate	Insufficient dust suppression and unsuitable stockpile locations	Covering loads of trucks leaving the site Speed limiting internal access road Temporary suspension of vehicle movements in excessively dry and/or windy conditions Quarrying operations, particularly crushing not to be undertaken on excessively dry and/or windy days	Dust suppression activities (water truck) Shutdown of processes or equipment Cessation of extraction and crushing activities
Failure of sediment basin	Rare	Moderate	Low	Water level exceeding basin capabilities	Regular monitoring and inspection of dam water levels, particularly during and after wet weather events Strategic watering as required to maintain acceptable levels within dams	Prevent discharge entering waterways or exiting site

Hazard	Likelihood	Impact	Risk Level	Contributing Factors	Pre-Emptive Actions	Incident Response Actions
Acts of vandalism (equipment damage)	Rare	Minor	Low	Not maintaining fenced property boundaries, inadequate security of entrance gate and other site buildings, and not isolating quarry equipment, vehicles and machinery	External fencing to be maintained No admittance of unauthorised personnel (Site Manager approval required)	Trespassing to be reported to police

3. POLLUTANTS INVENTORY

Table 7 – Pollutant Inventory

Product Name	Hazardous (Yes/No)	Storage Location(s)	Maximum Quantity Stored	SDS (Yes/No)
Captured stormwater	No	Sediment Basin	2 ML	N/A

4. SAFETY EQUIPMENT AND DEVICES

Table 8 – Safety Equipment and Devices

Product Name	Location(s)	Calibration / Maintenance Requirement
Fire extinguishers	Site office All plant	Biannual inspection Replaced after use
First aid kits	Site office All plant	Quarterly inspection / audit Replenished after use
Personal protective equipment, including: <ul style="list-style-type: none"> • Safety glasses • Gloves • Hearing protection • Hard hats • Face masks 	Site office	Inspected upon each use and replaced immediately, as necessary
Spill kits	Site office All plant	Quarterly inspection / audit Replenished after use
Safety Data Sheets	Site office	Reviewed for currency annually

5. INCIDENT MANAGEMENT STRATEGY

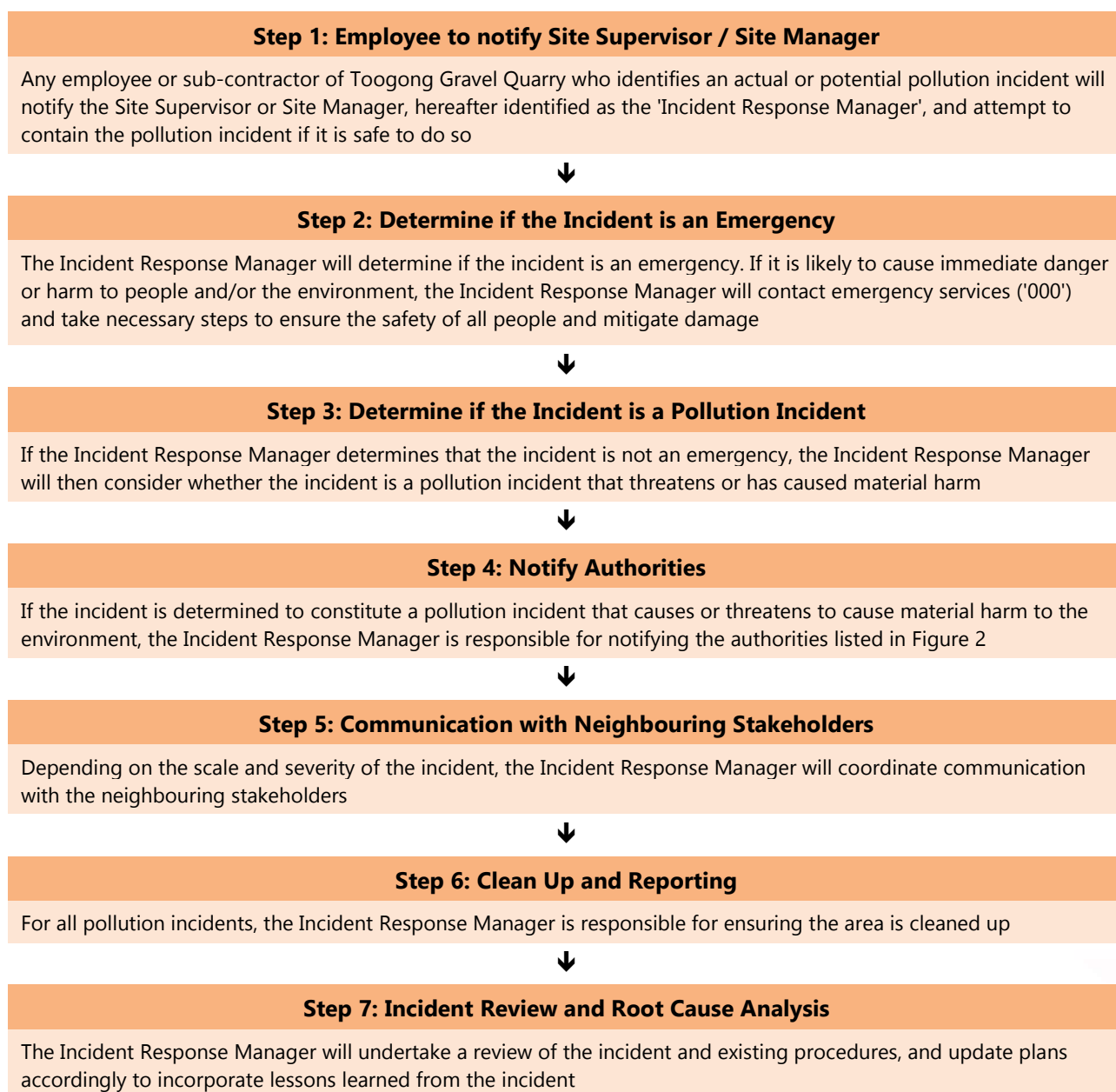
5.1 Incident Assessment Process

All site personnel with relevant training must make every effort to reduce or control the pollution incident on site, without putting themselves at risk of harm.

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be using a fire extinguisher, fire hose, water cart or smothering with cover material.

The process for PIRMP activation and implementation is outlined below in **Figure 1**.

Figure 1 – PIRMP Activation and Implementation Process



5.2 Immediate Containment Actions

Immediate incident containment actions are outlined in the Hazard Action Matrix, **Table 6** of **Section 2.2**.

5.3 Evacuation

Emergency procedures including incident detection, alert and site evacuation are outlined in the Emergency Response Plan, a hard copy of which is located at the site office. All employees and contractors of Toogong Gravel Quarry are inducted to the Emergency Response Plan prior to commencing operations at the site.

5.4 Notification

5.4.1 RELEVANT AUTHORITIES

As required, the Incident Response Manager will coordinate communication with the authorities identified in **Figure 2 (Section 6.2)** of this PIRMP.

A Pollution Incident Reporting Form is provided in **Appendix A** to assist the Site Supervisor in correctly recording and notifying the relevant authorities as detailed in Section 4.2.2 above

5.4.2 NEIGHBOURS AND COMMUNITY

Once the EPA has been notified of a pollution incident, the EPA may determine whether neighbours of the site need to be contacted by the Site Supervisor or Site Manager of Toogong Gravel Quarry and informed of the circumstances of the incident and actions being taken in response to it.

The Toogong Gravel Quarry Site Supervisor or Site Manager may at their own discretion voluntarily choose to notify neighbours.

The Toogong Gravel Quarry Site Supervisor or Site Manager would notify neighbours by 'door knocking' at neighbouring properties. General notification of early warnings and/or regular updates, as appropriate, may similarly be provided to neighbours.

6. KEY CONTACTS

6.1 Site Contacts

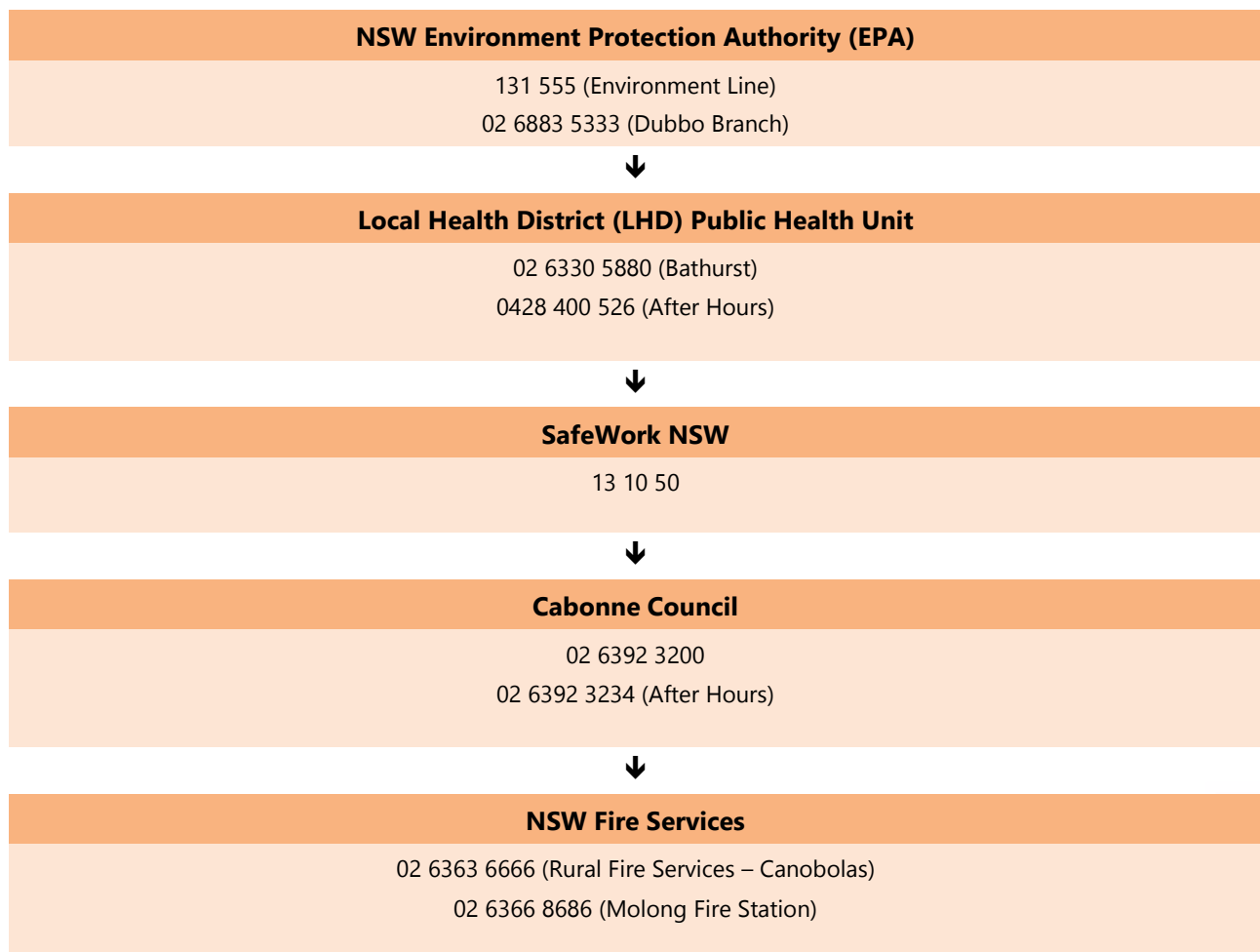
Table 9 – Site Contact Details

Name	Title	Contact Details
Jock Gordon	Site Manager	0418 963 565
Michael Hallahan	Site Supervisor	0418 245 668

6.2 Relevant Authorities

As required, the Incident Response Manager will coordinate communication with the authorities identified below in **Figure 2**.

Figure 2 – Authority Notification Details



6.3 Neighbours and Community

Table 10 – Neighbour and Community Contact Details

Name	Location	Contact Details
Cabonne Council	Molong	02 6392 3200
Neighbouring Residences	Adjacent Properties	Door Knock

7. STAFF TRAINING

New members of staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner. In particular:

- Staff must be capable of using the fire-fighting equipment;
- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.

Staff competency will be monitored through audits, public complaints and pollution incident reports.

At least once every year staff are to undertake a simulated pollution incident response exercise, (including consultation with emergency services where practicable), to familiarise site personnel with the requirements of this management plan. A register of staff training can be found in **Appendix B** and must be kept on site and updated regularly.

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

8. TESTING AND UPDATING

8.1 PIRMP Testing

8.1.1 METHODS

Testing of this PIRMP will be undertaken at least once every 12 months. A practical drill will be undertaken annually to ensure that the information included in the plan is accurate, up to date and workable.

8.1.2 RECORDS

A register for testing the PIRMP can be found in **Appendix C** and must be kept on site and updated as required.

8.2 PIRMP Updates

8.2.1 TRIGGERS

This PIRMP is a dynamic document required to be reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

8.2.2 RECORDS


For the above reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use.

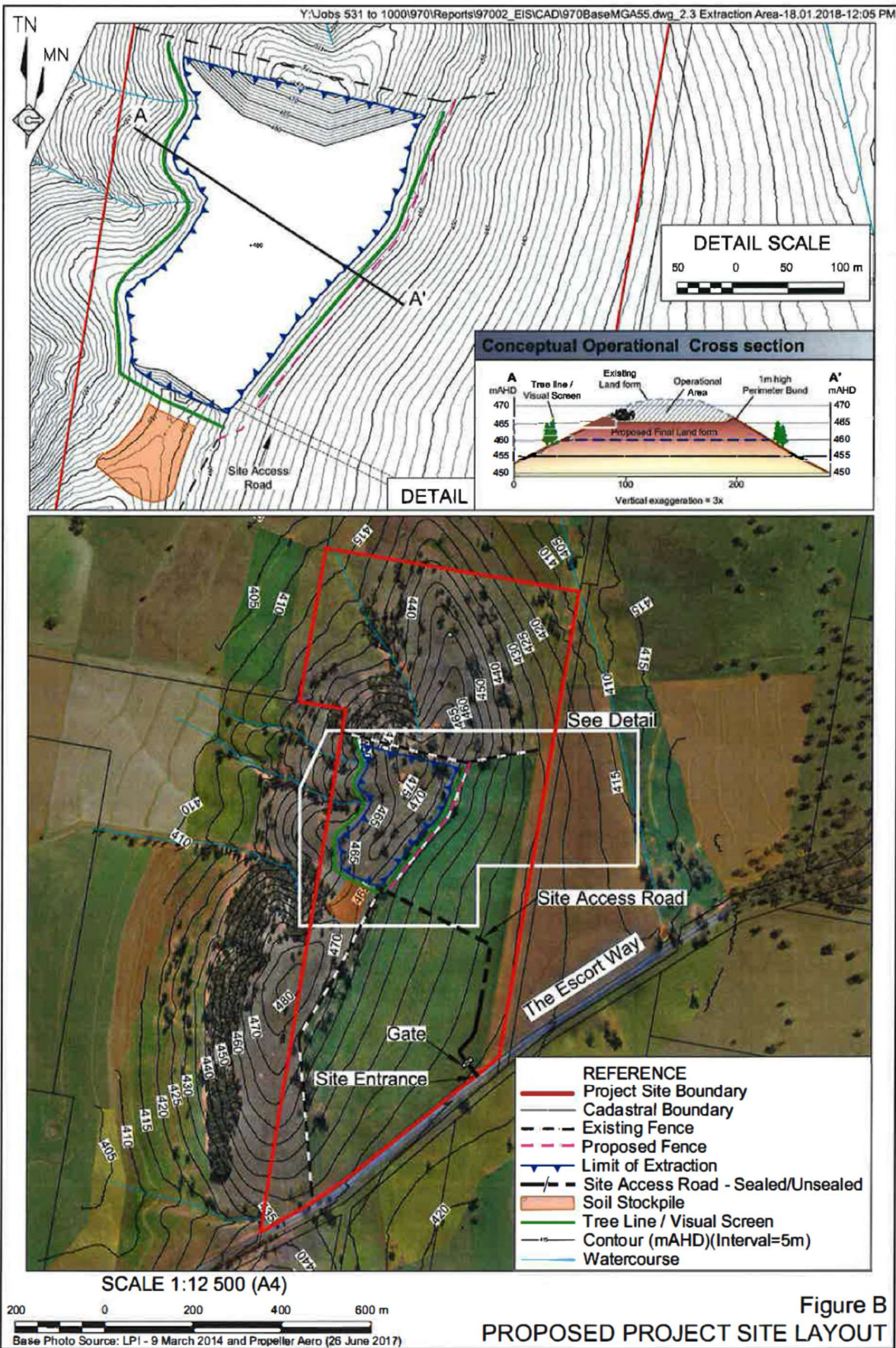
Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version is replaced in its entirety. A register for updating the PIRMP can be found in **Appendix C** and must be kept on site and updated regularly.



SITE LAYOUT

From *Toogong Gravel Quarry Environmental Impact Statement*, (R.W. Corkery & Co., 2018)







APPENDIX A

POLLUTION INCIDENT REPORTING FORM

Incident No:

Time:

Date:

Duration of Incident:

Nature of Incident:

Temperature:

°C

Wind direction & speed:

km/hr

Relative Humidity:

%

Rainfall since 9am:

mm

Fire Danger Rating:

<http://www.bom.gov.au/climate/data/index.shtml> '065084– Toogong (Glenayr)

The Location of the Place Where Pollution is Occurring or is Likely to Occur:

The Nature, the Estimated Quantity or Volume, and the Concentration of any Pollutants Involved:

The Circumstances in which the Incident Occurred, Including the Cause of the Incident:

The Corrective Action Taken or Proposed to be Taken to Deal with the Incident and Any Resulting Pollution or Threatened Pollution:

Notification:

Stakeholder	Date / Time	Contact
NSW Environment Protection Authority	/ / am/pm	
NSW Public Health	/ / am/pm	
SafeWork NSW	/ / am/pm	
NSW Fire and Rescue	/ / am/pm	

Notification of Neighbours Required by EPA

Yes / No

If Not, Have Neighbours Been Notified Voluntarily

Yes / No

Particulars:

Signature:

Date / /

Title:

Signature:

Date / /

Title:



APPENDIX B

REGISTER OF STAFF TRAINING

[illegible]



APPENDIX C

PIRMP TESTING & UPDATE REGISTER

[illegible]



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