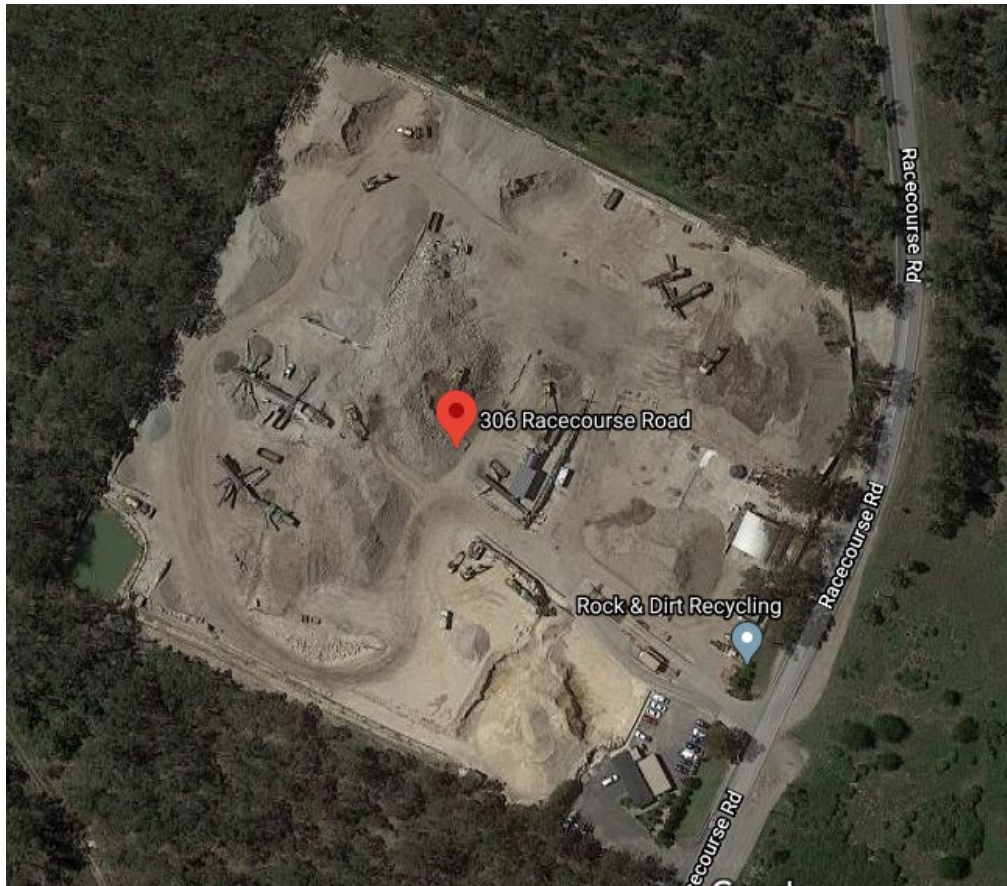




Pollution Incident Response Management Plan



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PIRMP Review and Test Record

This plan and the pollution incident controls contained within shall be periodically checked to ensure compliance with legislative updates and EPA licence requirements. At a minimum the content of the PIRMP will be reviewed annually and the pollution controls will be reviewed every six months to ensure they up to date with any specific environmental compliance requirements are effective and in the event of a pollution incident

Document Review

Register of Amendments					
Date	Page / Form No.	Version No.	Description of Amendments	Prepared by	Approved by
Sept 19	All	4	Development of new PIRMP	D O'Dea	M Harloff
Sept 23	All	5	Review and update of existing plan, renamed to PIRMP from EIRMP	D O'Dea	D O'Dea

PIRMP Test Record

Date	Name	Description
Sept 24	John Nakhoul	Annual PIRMP Test
Aug 25	John Nakhoul	Annual PIRMP Test – Flood Scenario

Description of Hazards Identified at Rock & Dirt

The types of hazards which have been identified by Rock & Dirt which could occur within and immediately surrounding the facility include:

1. Fire

The entire area surrounding the Rock & Dirt facility within South Windsor is dense bushland. The Australian climate is prone to regular summer bushfires due to weather conditions of high heat, strong winds and low humidity.

2. Dumping of a Hazardous or Dangerous Good.

Rock & Dirt are susceptible to illegal dumping where the driver will dump hazardous or dangerous goods without their knowledge. Rock & Dirt is able to identify the hazardous or dangerous goods once they have been dumped but have no control of knowing what is in the load prior to it being dumped.

3. Illegal Dumping of Material and Waste

Although security measures are in place, Rock & Dirt understands that their facilities can be compromised and that trucks looking to dump illegally may try and do so without the acknowledgment of Rock & Dirt.

4. Excessive Sediment Run Off into Surrounding Areas

Although all run off from the facility is contained with the aid of perimeter sediment control fencing and perimeter drainage channels that run into the onsite collection dam Rock & Dirt understands that these controls may be breached in the event of excessive flooding.

5. Natural Disasters *e.g., fire, floods, earthquake, gale force winds or major electrical, hail or other storm*



Likelihood of hazards at Rock & Dirt

The likelihood of any such hazards occurring within the Rock & Dirt facility and immediately surrounding the facility are as follows:

1. Fire

As the entire area is surrounded by dense bushland, the likelihood of bush fires is high but within the facility the risk is much lower. All material being dumped within the facility is not prone to fire as it is mainly rock and dirt material. However, there is a section within the facility which caters to the dumping of vegetation, but this is a minimal quantity and does not pose a fire risk.

2. Dumping of a Hazardous or Dangerous Good.

Rock & Dirt is unable to identify the likelihood of dumping hazardous or dangerous goods. Loads are inspected prior to tipping but this cannot guarantee hazardous or dangerous goods are not contained within a load.

3. Illegal Dumping of Material and Waste

Rock & Dirt is unable to identify the likelihood of an external party illegally dumping within the facility. Therefore, the facility is surrounded by security fencing to restrict unauthorized access.

4. Natural Disasters *e.g., fire, floods, earthquake, gale for winds or major electrical, hail or other storm*

Rock & Dirt is unable to identify the likelihood of a natural disaster but has implemented controls to minimize possible pollution incident arising from disasters such as storms, flood and excessive rain.

5. Fuel and Oil spills

Due to the nature of the Rock & Dirt operations and the requirement for the use of heavy equipment and mobile plant fuel and oil spills may occur during the operation and maintenance of onsite plant and equipment.

Pre-emptive Actions to be Taken

Having identified the main hazards to health and safety or the environment associated within the activities conducted by Rock & Dirt, the below details of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health and safety or the environment arising from the relevant hazard.

Fire

Being surrounded by dense bushland, preventative measures are put in place to prevent the occurrence of a fire within the facility. These measures include:

- The cleaning of surrounding areas within the facility of any vegetation and materials that can fuel a fire. This includes the cleaning of building gutters and drains to minimize ignition sources.
- Flammable and combustible liquids and gases are stored correctly to minimise the risk of leaks, spills and fire.

Dumping of a Hazardous or Dangerous Good

Pre-emptive actions to prevent the disposal of hazardous or dangerous goods within the facility include:

- Signage is installed to advise what materials can and cannot be disposed of at the facility.
- The Weighbridge has cameras installed to identify what is in the load prior to disposal.
- The Weighbridge operator physically inspects the load prior to it being allowed to be disposed of.
- Once authorised to dispose of the load within the facility, the mobile plant operator or site supervisor will oversee the dumping of the load to identify if any hazardous or dangerous goods are contained within the load.
- If any unauthorised material is present the load is rejected and reloaded into the truck / trailer and recorded as a rejected load.

Illegal Dumping of Material and Waste

Pre-emptive actions to prevent the entering of the facility and the illegal dumping of material and waste within the Rock & Dirt facility are as follows:

- Installation of security cameras within the premises.
- Security fencing securing the perimeter of the facility.

Natural Disasters

Pre-emptive actions to prevent damage caused by natural disasters include:

- Stockpiles, haul roads etc are regularly watered down by the use of onsite sprinkler systems and water carts to prevent the distribution of dust to surrounding areas during storms and high winds.
- Sediment fencing has been installed around the perimeter of the facility to contain as far as practical any sediment contained within flood waters or excessive rain events. Additionally, a drainage channel has been installed to direct site run off into the onsite storage dam.

Fuel and Oil Spills

In order to minimise the risk of contamination from fuel and oil spills all maintenance work as far as practical is carried out in the hard stand maintenance area which is equipped with bunded storage and spill kits. Refuelling is carried out utilising a fuel truck that attends site eliminating the need for onsite fuel storage.

Inventory of pollutants

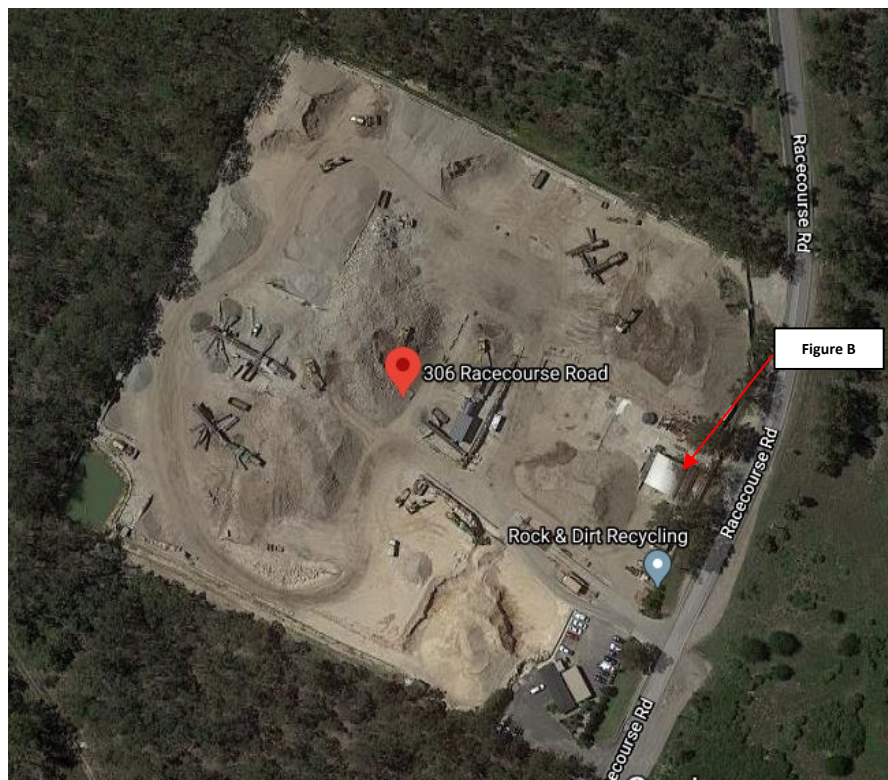
Within the Rock & Dirt facility the only pollutants that are required for the function of the business are on site, these include:

Hydraulic / Engine Oil

Approximately 2,500 litres of hydraulic and engine oil is kept on site for use in the earth moving equipment. The location of the hydraulic oil within the facility is on bunded pallets stored within the workshop area detailed on the below site plan.

Waste Oil

Waste oil generated from the maintenance of mobile plant is stored in bunded drums which are periodically collected by a third party for recycling earth. This waste oil is stored within the workshop area detailed on the below site plan.





Safety Equipment

Personnel working within the Rock & Dirt facility are required at all times to wear the appropriate personal protective equipment consisting of high vis clothing, respiratory protection, hard hats, gloves and safety glasses to prevent and minimise any risk of injury. In addition, the following equipment is in place to help minimise health, safety and environmental incidents and risks.

Fire Extinguishers

Throughout the entire facility, fire extinguishers have been placed in strategic locations for use in the event of a fire. All heavy equipment and mobile plant are also fitted with appropriate fire extinguishers. Applicable class fire extinguishers are also located within the workshop area, site offices, weighbridge and employee amenities.

Site Cameras

Site security cameras have been placed strategically throughout the entire Rock & Dirt facility to assist in identifying any risk or hazard including possible illegal dumping of material outside operating hours.

Safety Signage Including Speed Notifications

Safety Signage and speed notification signs are placed throughout the facility. These signs act as visual warnings of any hazards that may be present within the facility. Additionally, signage is installed at the entrance to the facility detailing waste materials that can / cannot be accepted for disposal.

Dust Control Sprinklers

Dust control sprinklers are used throughout the entire facility to wet down all stockpiled material. This wetting down will limit the risk of dust generation and contamination outside the facility during high winds. Additionally haul roads are periodically wetted down to minimise dust generated during vehicle movement whilst driving through the facility.

Silt Fencing

The installation of silt fencing within the facility is designed to prevent the runoff of any material sediment breaching the site boundary in the event of excessive rain and flooding. This silt fencing is used in conjunction with the perimeter drainage system to contain material sediment.

Wheel Wash

Wheel wash bays are installed at the Rock & Dirt facility adjacent to the weighbridge to wash dirt from vehicle wheels upon exit from the facility. The water within the wheel wash bays is continuously filtered to ensure the effectiveness of washing material from trucks prior to exiting the facility. In addition to wheel wash bays Rock & Dirt operates a road sweeper to ensure the surrounding roads are kept clean and free of any spoil.



Spill Kits

Spill kits are in place to ensure that in the event of a spill the liquid can be contained and prevented from spreading to the surrounding environment and waterways. Any liquids stored, handled and decanted are done so in a safe and compliant manner to avoid spillage that can injure personnel and damage assets and natural resources. Bunded storage is in place for all bulk hazardous liquid storage to assist in containing any spillage. Liquids are stored in a location away from any drains or waterways to minimise any possible contamination of the surrounding area.

Emergency Contact Details

In the event of a pollution incident the following details the relevant contacts, their names, positions and the 24-hour contact details of those key individuals responsible for:

- (i) activating the plan,
- (ii) notifying the relevant authorities, and
- (iii) are responsible for managing the response to a pollution incident.

Name	Position	Contact
Michael Moit	Director	0412 444 403
Jason Khouri	Group Manager	0426 264 444
John Nakhoul	Rock & Dirt Manager	0404 408 842

The contact details of each relevant authority in the instance of a pollution incident are as follows:

NSW Environment Protection Authority (EPA)	131 555
Hawkesbury Hospital	2 Day Street, Windsor NSW 2756 (02) 4560 5555
NSW Work Cover	13 10 50
Fire and Rescue NSW	1300 729 579 000 (if the situation warrants an emergency)

Communicating with Neighbours and the Local Community

Located in South Windsor, the Rock & Dirt facility is fairly secluded.

In the event of a significant incident, Rock & Dirt have identified that they will need to communicate with the following neighbours listed below:

Turtle LandscapeSupplies

Racecourse Road, South Windsor NSW 2756(02) 4574

3299

There are 2-way radios in place for communication between the yard operatives, weighbridge staff and the main office. If any incidents were to occur within the yard, the front office and weighbridge will be notified and will have the contact details of the listed neighbours should communication be required.

Rock & Dirt will provide information to the community via community websites should any contaminants enter the water within the area.





Minimising Harm to Persons on The Premises

Visitors to the Rock & Dirt facility must sign in and out at the front desk. This enables Rock & Dirt staff and management to verify who is within the facility in the event of an emergency.

Once signed in, all visitors and staff must wear the appropriate PPE at all times when in the facility.

Warning mechanisms are placed throughout the facility to assist in the warning of an incident. The mechanisms include air horns and 2-way radios. If an incident occurs anywhere in the facility, all staff and management are notified immediately via the 2-way radio and the air horn will notify anyone unaware.

In the event of an incident where evacuation is required clearly marked assembly points are in place where all employees are to assemble.

In case of injury to any person, emergency services will be called immediately, if required. First aid will be administered to the affected person by a trained Rock & Dirt employee.

In the event of a neighbourhood emergency and / or a serious traffic incident, the site manager /supervisor will assess the situation and decide on the correct and safest course of action to be taken.

Maps

Below is an aerial shot of the entire Rock & Dirt facility located at 306 Racecourse Road, Clarendon NSW 2756





Actions to be Taken During or Immediately After an Environmental Incident

All actions taken during and after an environmental incident will vary depending on the nature of the properties of the pollutant/s and severity of the incident.

Detailed records / evidence collection shall be carried out provided it is safe to do so and with approval of the person in control of the site. Evidence may include photographs, samples and written notes.

During an Incident

In the event of an environmental incident occurring, the following steps are to be taken:

- Ensure the safety of yourself and anyone in the vicinity and contain the environmental incident if safe to do so,
- Rescue anyone in immediate danger, do not place yourself at risk,
- Raise the alarm immediately.

If an immediate emergency and an uncontrolled event occurs call:

Fire and Rescue NSW	000
NSW Environment Protection Authority (EPA)	131 555
Hawkesbury City Council	4560 4444
Hawkesbury Hospital	4560 5555
NSW Ministry of Health	9391 9000
NSW Work Cover	13 10 50

Post Incident Reporting

Reporting of the incident to the EPA shall include the following information:

1. The time, date, nature, duration and location of the incident.
2. The location of the place where the pollution is occurring or is likely to occur.
3. The nature, the estimated quantity or volume and the concentration of any pollutants involved if known.
4. The circumstances in which the incident occurred (including the cause of the incident if known).
5. The action taken or proposed to be taken to deal with the incident.

Staff Training

Rock & Dirt management aims to ensure staff are competent in key functional areas, that ongoing training is provided, and the currency of training is monitored throughout the employees' period of employment with Rock & Dirt.

Training will include but will not be limited to the following:

- Provide specific skills such as emergency response.
- Enable the proficient use of specialised equipment.
- Ensure detailed familiarity with this plan and supporting procedures.
- Ensure learnings from mock evacuation and other emergency management exercises are communicated.
- Site inductions for all new personnel
- Toolbox meetings to identify basic training and possible WHS issues.

Where required, sub-contractors and visitors to Rock & Dirt facility will be trained in understanding the emergency response plans, their roles and responsibilities, and the use of emergency responderesources.