



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)



MOOREBANK EPL 4612

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PIRMP Testing Log

Date Tested	Method of Testing (Desktop or practical drill)	Tested by	Position
30/03/2015	Desktop Simulation	Mark Morris	Production Manager
14/12/2016	Desktop Simulation	Marko Zdrilic	Production Manager
14/09/2018	Desktop Simulation	Marko Zdrilic	Production Manager
5/11/2019	Desktop Simulation	Marko Zdrilic	Production Manager
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PIRMP Revision Log

Rev No	Date	Revision Details	Author	Reviewer
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02	20/12/2016	Review Document	Mark Hutcheson	Marko Zdrilic
03	14/09/2018	Update Organisational chart	Alycia Campbell	Marko Zdrilic
04	5/11/2019	Review content	Alycia Campbell	Marko Zdrilic
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1 INTRODUCTION

This Pollution Incident Response Management Plan (PIRMP) has been developed in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.

The elements of the plan that relate to risk and hazard identification as well as the development, maintenance and review of protocols and controls have been addressed by the Operations Manager and WHS Advisor. These PIRMP elements are now embedded in the company's Quality, Environmental and Safety Management systems.

Benedict's system of consultation, being predominantly site toolbox meetings, is the principal forum to implement further practical refinement, testing and clarification of these plans in response to the requirement of the legislation.

One of the most important elements introduced by the legislation is the requirement to report pollution incidents to appropriate authorities and the community. This legislation was enacted in response to Orica chemical plant incidents at Kooragang Island where chemical and gas leaks occurred in 2011 and impacted residential areas.

2 OBJECTIVES

The objectives of this plan are to:

- Ensure comprehensive and timely communication about a pollution incident to:
 - Staff at the premises
 - Environment Protection Authority (EPA)
 - Local council
 - NSW Ministry of Health
 - WorkCover NSW
 - Fire and Rescue NSW
 - People outside the facility who may be affected by the impacts of the pollution incident
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible, or implementing and ensuring that the plan is regularly tested for accuracy, currency and suitability.

The definition of 'pollution incident' is:

Pollution incident means 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.

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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.

So what needs to be reported?

Based on the legislative definitions, staff are advised, the following pollution incidents must be reported:

A leak, spill or emission (say gas or fumes from a fire) which is not trivial (i.e. not of small value or importance – must be over \$10,000) and involves actual potential harm to the environment or human health.

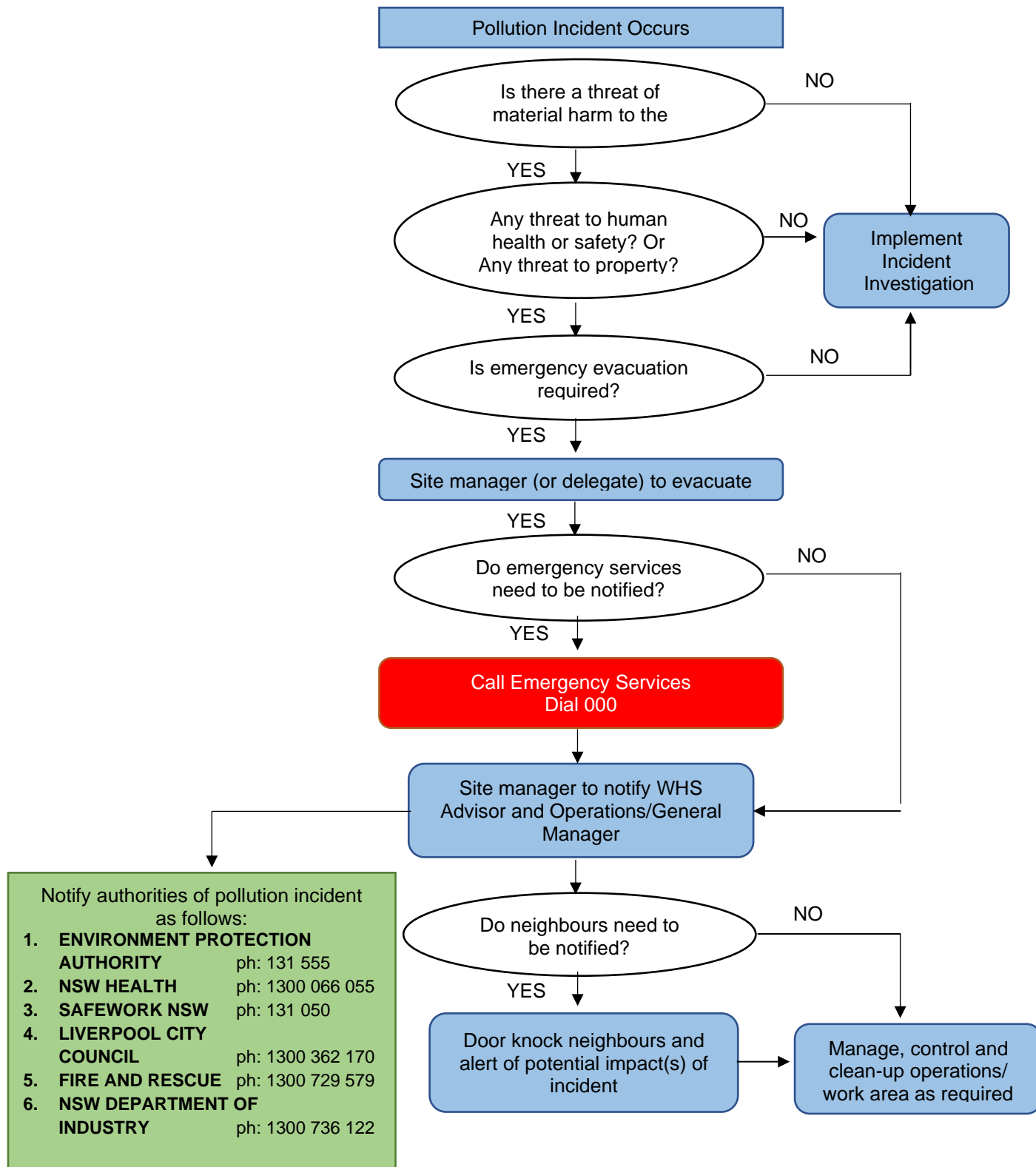
In relation to our operations, these pollution incidents are most likely to result from large fuel spills or acts of vandalism/arson to our equipment. If there is doubt, contact your site manager immediately. Immediately means immediately, promptly and without delay.

These examples are provided as a guide:

Scenario	Likely Status
Jerry can of fuel spilling	Not reportable
Jerry can of fuel spilling and starting large fire	Reportable – assuming that fire causes damage in excess of \$10,000 e.g. destroys a piece of plant
5,000 litre diesel fuel spill from storage tank that is contained within safety	Not reportable provided no discharge from bund and spill is contained
5,000 litre diesel fuel spill from storage tank that is NOT contained within safety bund	Reportable, damage is in excess of \$10,000 and clean-up costs need to also be included.
Vehicle hydraulic hose leak or failure resulting in small spill	Not reportable provided there is no escape to waterways

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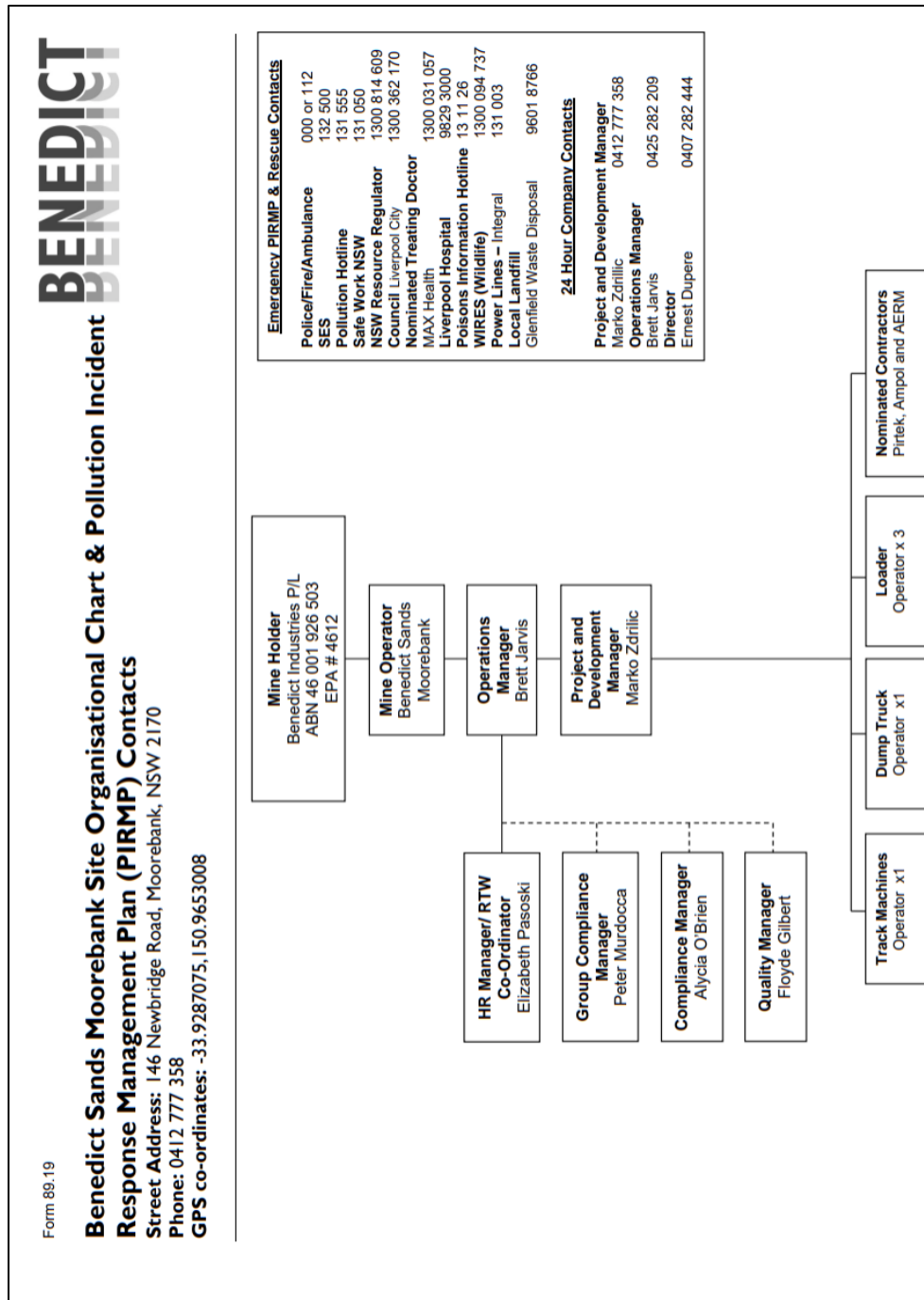
3 INITIAL RESPONSE PROCEDURE FLOWCHART



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4 SITE CONTACT/ORGANISATIONAL CHART



5 DESCRIPTION AND LIKELIHOOD OF ENVIRONMENTAL HAZARDS

Identifying the key environmental management issues relating to the operation of the facility is critical to the preservation of human health and the protection of the environment.

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There are four (4) key sources of potential environmental hazards where risk associated with activities being undertaken at the premises must be managed (see below):

- Soil Contamination
- Noise Pollution
- Air Pollution
- Fire potential

5.1 LIKELIHOOD

Site personnel must be aware there are certain circumstances or events that could or would increase the likelihood of a hazard occurring. When the following conditions arise, extra precautions may be necessary on site.

Water contamination:

- Periods of prolonged wet weather may increase the likelihood of water contamination of the surrounding local amenities

Air Pollution/Dust emissions:

- Hot, dry, windy conditions
- Disturbance of fine, dry material
- High levels of traffic on unsealed roads or dusty roads with no dust suppression

Fire Potential:

- Hot, prolonged dry, windy conditions with low humidity
- Stockpiles of recyclable waste may spontaneously combust
- Hot works on site for maintenance activities

The potential environmental hazards above have been risk assessed and are included on the site's Environmental Risk Register which is attached in Appendix A. Figure 1 below shows the site's proximity to sensitive receivers.

5.2 SITE MAPS

It is a requirement of the PIRMP to contain detailed and up to date maps and diagrams which assist proper planning and emergency response.

The PIRMP must include a map (or set of maps) showing the:

- Location of the premises	See Figure 1: Site Location and Proximity to Sensitive Receivers
- Surrounding area likely to be affected by a pollution incident	See Figure 1: Site Location and Proximity to Sensitive Receivers
- Location of potential pollutants on the premises (including underground tanks)	See Appendix B – Bulk fuels and combustibles location map and; Appendix C – Emergency evacuation maps detailing the location of safety equipment, pollution control and pollution response equipment on the premises

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- Location of any stormwater drains on the premises

See Figure 2: Site Stormwater Directional Flows

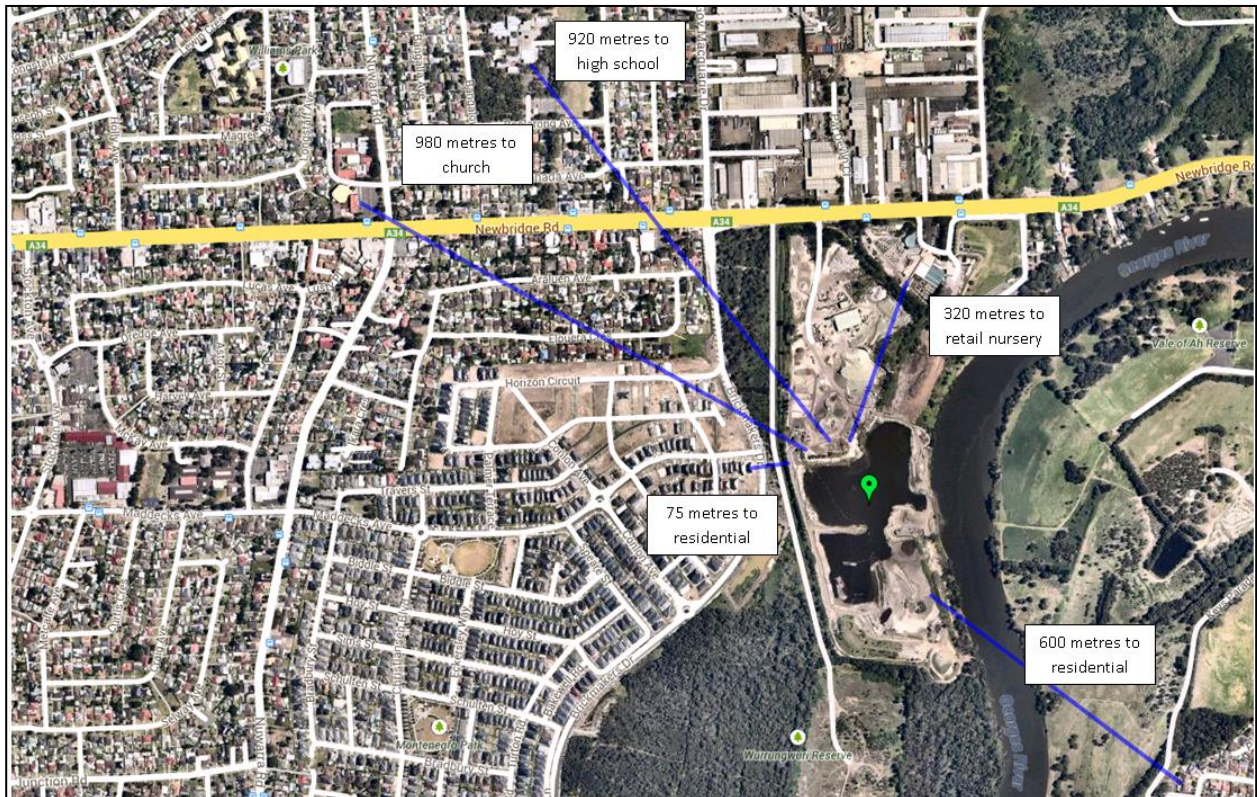


Figure 1: Site Location and Proximity to Sensitive Receivers

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5.3 SOIL CONTAMINATION

The primary objective of soil contamination management at the premises is to stop any spillage of substances (contaminants) from affecting the site and its surrounds.

The following main hazards exist at the premises in relation to soil contamination:

- Storage of chemicals/hydrocarbons
- Storage of waste materials

Spillages that could contaminate soils are most likely to occur during refueling activities or from ruptured lines. If this situation occurs the remediation process should remove any threat of the pollutant reaching surrounding waterways via slow movement through the soil. Soil contamination can kill organisms in the soil that provide valuable ecosystem services.

5.3.1 INVENTORY OF POTENTIAL WATER POLLUTANTS

Table 1 below details chemicals/hydrocarbons with the potential to pollutant which are stored or held at the premises together with their storage capacities:

Pollutant	Maximum Quantity	Storage Method	Location
Diesel Fuel	26,600 litres	Aboveground Bunded tank	East of Office area
Engine Oil	<4,000 litres	205 Litre Drum	Workshop area
Hydraulic Oil			

Table 1: Potential Soil Pollutants

Appendix A shows the storage locations of the diesel fuel and oils/lubricants throughout the site.

Any waste stored on site is comprised solely of non-putrescible waste, predominantly from building and demolition sources.

In the event that prohibited wastes such as paints and other liquid wastes are identified in loads of mixed waste received at the site, these loads are rejected.

5.4 NOISE POLLUTION

The aim of noise pollution management at the premises is to ensure noise generated by the facility does not adversely affect the site or its surrounds.

Potential sources of noise pollution include:

- Operation of mobile plant equipment
- Operation of fixed plant equipment
- Maintenance activities

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5.5 AIR POLLUTION

Air pollution management initiatives at the premises are designed to ensure air quality (dust and odour) generated by the facility does not adversely affect the site or its surrounds.

Potential sources of air borne dust include product stockpiles, site roadways, processing plant and loading/unloading of trucks.

There are no sources of potential odour onsite.

5.6 FIRE POTENTIAL

Fire management initiatives at the premises are designed to minimise the risk of fire damage to the facility and its surrounds. The facility is regularly assessed for fire risk levels and preventative/minimisation activities implemented as required.

Adjoining the site to the north-west and south are tracts of bushland which are well clear of the operational parts of the site. The risk of fire on site is minimal.

5.6.1 INVENTORY OF FUELS AND COMBUSTIBLES

Table 2 below list details the fuels and flammables held on the premises and their storage capacities. The location of these fuels/combustibles is shown in Appendix A:

Pollutant	Maximum Quantity	Storage Method	Location
Diesel Fuel	26,600 litres	Aboveground Bunded tank	East of Office area
Engine Oil	<4,000 litres	205 Litre Drum	Workshop area
Hydraulic Oil			

Table 2: Fuels and Combustibles Inventory

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6 PRE-EMPTIVE ACTIONS TO MITIGATE ENVIRONMENTAL HAZARDS

There are four (4) key sources of potential environmental hazards where risk associated with activities being undertaken at the premises must be managed (see below):

- Soil Contamination
- Noise Pollution
- Air Pollution
- Fire potential

6.1 SOIL CONTAMINATION MITIGATION STRATEGIES

All hydrocarbon (fuel) sources that could potentially contaminate the soil are stored in bunded facilities, concentrating any potential spillages and preventing them from dispersing beyond immediate surrounds of the containment area. Bunded areas are inspected regularly to ensure they are free of debris, spills or water to enable maximum capacity to capture any potential spills.

The potential for spills will be minimised by:

- Inspecting incoming waste for liquids
- Re-fueling operations of plant to be undertaken by suitably trained personnel
- Provision of spill kits and training of personnel in their use

Spill containment kits are maintained in place at each bunded area.

6.2 NOISE POLLUTION MITIGATION STRATEGIES

Noise generated at the premises will be controlled by:

- Limiting the hours and types of operation to that which is approved
- Using stockpiles placed between machinery and boundaries as noise barriers
- Ensuring that plant and equipment are operated such that the noise centre is no higher than the solid boundary fences or stockpiles
- Limiting machinery used to that which meets noise generation guidelines for this type of operation
- The correct operation and maintenance of machinery

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6.3 AIR POLLUTION MITIGATION STRATEGIES

The site is monitored for dust generation particularly during busy or windy (dry) days and control activities implemented as required.

Dust generated at the premises will be controlled by:

- Work stockpiles in concentrated areas allowing for the stockpile to work as a wind break
- Ceasing or reducing loading and unloading of stockpiles during strong wind conditions
- Traffic to always obey site speed limits and traffic management
- Use water cart and hoses to dampen dusty surfaces and stockpiles
- Ceasing or reducing processing activities during strong wind conditions
- Cleaning hardstand /roads by street sweeper
- All trucks to cover loads when entering/exiting the site
- Maintain all dust suppression equipment to be always in good working order and operable

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6.4 FIRE MITIGATION STRATEGIES

The potential for fires will be minimised by:

- Accepting only permitted wastes
- Identifying, sorting and appropriately disposing of gas bottles, vehicle batteries and tyres etc
- Regularly removing residual waste from the site
- Conducting regular litter patrols
- Maintaining machinery/equipment in good working order to minimise the risk of sparks
- Ensuring stockpiles are sufficiently dampened (refer 6.3 Air Pollution Mitigation Strategies)

Fire fighting shall be undertaken in association with the NSW Fire Brigade. Small fires are to be extinguished utilising the fire hoses and sprinkler systems provided on site in the first instance by staff who are competent and confident to do so. Fire fighting capability will be maximised by:

- Maintaining appropriate fire fighting equipment/facilities in good working order
- Ensuring adequate water supply for fire fighting
- Train personnel in basic fire fighting and emergency response protocols

Appendix B shows the location of fire fighting equipment/devices throughout the premises.

7 COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

In the event of an environmental incident occurring at the site, impacts on the neighbouring business and local community will be variable and depend on location, volume of spills or other factors such as wind direction and velocity.

If an environmental incident on site is likely to impact neighbouring businesses or the local community, surrounding neighbours will usually be contacted face to face or through information left at the place of residence by a Benedict representative to notify them of the situation. This notification should include any possible impacts to the neighbour as well as the procedures that have been put in place to rectify the situation.

Communication methods will be used on a case by case basis, but in all situations Benedict Recycling will attempt to provide early warnings to those neighbours likely to be directly affected. Early warnings would typically include details of the nature of the incident and how those likely to be affected can best prepare and respond to the incident.

Ongoing communication with the neighbouring businesses/residents will be maintained until such time as the incident is rectified.

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8 STAFF TRAINING

All staff undertake a company induction upon commencement of employment and a site-specific induction relevant to their particular place of work (site). In addition to inductions, all persons (employees, contractors and visitors) will receive additional training in some or all of the following as relevant to their function on site:

- Emergency exits and evacuation routes
- Emergency Assembly area
- Emergency lighting and exit signs
- Emergency rescue
- Smoke control and smoke detectors
- Fire fighting devices (hydrants, hose reels and extinguishers)
- First aid
- Shutting down plant and processes
- Hazardous substances
- Traffic flows/management plan
- Evacuation drills and debriefing

Individual staff training requirements are discussed during regular tool box meetings.

Basic environmental training is provided to all site employees which references the purpose, use and location of this PIRMP document. This training is to be conducted annually upon review and updating of the PIRMP document and more frequently as necessary (e.g. on-boarding of a new employee).

9 TESTING AND REVIEW OF PIRMP

This PIRMP is scheduled for routine testing and reviewing on an annual basis. The site's Annual Return Notice serves as a prompt to test and review the PIRMP.

In the event that a pollution incident occurs, this PIRMP must be tested and assessed for capability and effectiveness within one month of the pollution incident occurring.

The usual method of testing this PIRMP is to undertake a desktop simulation and follow-up with a briefing of outcomes at site tool box meetings where findings and recommendations are considered. Alternatively, an environmental incident scenario may form the basis for a site evacuation drill (practical drill) whereby the PIRMP can be tested and its effectiveness/adequacy reviewed.

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APPENDIX A

Critical Pollution Incident

Incident	Potential Risk	Likely Responders	Initial Actions
Fire (potential to be surface or subsurface associated with landfill gas).	Human life and property damage, reduced air quality, impact on the environment.	NSW Fire and Rescue, NSW Police, NSW Ambulance (as required), Liverpool City Council, NSW EPA.	Evacuate site. Call emergency services immediately on 000.
Spill of liquid fuel whilst in storage/ during delivery of fuel to storage tank/mobile equipment.	Explosion / fire / fumes and impact on environment (soils, groundwater and surface water)	NSW Fire and Rescue, Liverpool City Council, NSW EPA.	Engage with NSW Fire and Rescue and NSW EPA.

Non-Critical Pollution Incident

Incident	Potential Risk	Likely Responders	Initial Actions
Airborne dust generated from soils/stockpiled materials on site.	Reduced air quality for site and neighbouring properties.	Liverpool City Council, NSW EPA.	Minimise exposure of soils in accordance with the RAP. Wet-down and/or cover exposed soils generating the dust.
Airborne dust generated from movement of trucks and heavy machinery	Reduced air quality for site and neighbouring properties.	Liverpool City Council, NSW EPA.	Wet-down relevant haul routes
Run-off of contaminated water (in particular with respect to Georges River to the south east of the site).	Contamination of water ways and impact on the environment.	Liverpool City Council, NSW EPA.	Minimise exposure and migration of soils, installation of silt fences, investigate source/location of contaminants.
Import of potentially contaminated soil during import of material for cap.	Contamination of soils onsite.	NSW EPA	Inspection of material upon arrival in accordance with the fill management protocol / RAP/ LCMP.

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APPENDIX B

Site Training Record Sheet

Form 275

Training Record

BENEDICT

Training Scope:	ENVIRONMENTAL AWARENESS TRAINING			
Location:		Date/s:		
Trainer:	MARK HUTCHESON	Duration:	Total Hrs/Mins:	
Principle Areas Covered in Session/s:	NSW Legal Requirements, Environmental Regulations, Benedict Environmental Policy, Benedict Environmental Responsibilities, Environmental Impacts, Examples of Pollution, Benedict Environmental Procedure, Pollution Incident Response Management Plan (P.I.R.M.P)			
Practical Training Provided:	N/A			
Assessment Undertaken:	Form Number:		Title:	
Training Material Reference:	Form Number:		Title:	Environmental Awareness Training (Powerpoint presentation)
Material Provided to Participants:	Form Number:		Title:	
Trainee/s:	Name (Print)	Signature	Name (Print)	Signature
	1.		11.	
	2.		12.	
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