

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

MAYFIELD WEST



PIRMP – Newcastle

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1 TESTING & REVISION LOG

PIRMP Testing Log			
Date Tested	Method of Testing (Desktop or practical drill)	Tested by	Position
15/05/2017	Desktop	Dayne Steggles	Site Manager
12/10/2017	Desktop	Dayne Steggles	Site Manager
19/10/2018	Desktop	Heath Nowlan	Site Manager
5/11/2019	Desktop	Heath Nowlan	Site Manager
20/01/2021	Desktop	Heath Nowlan	Site Manager
05/11/2021	Desktop	Heath Nowlan	Site Manager
11/11/2022	Desktop	Heath Nowlan	Site Manager
24/11/2023	Desktop	Heath Nowlan	Site Manager
29/11/2024	Desktop	Heath Nowlan	Site Manager
26/11/2025	Desktop	Heath Nowlan	Site Manager

Environmental Management Plan Revision Log				
Rev No	Date	Revision Details	Author	Reviewer
01	25/05/2016	Draft new document	Mark Hutcheson	Dayne Steggles
02	31/05/2016	Updated after issue of EPA licence	Mark Hutcheson	Dayne Steggles
03	20/07/2016	Updates to PIRMP	Mark Hutcheson	Dayne Steggles
04	15/05/2017	Add Fuel Tank, Risk Register	Mark Hutcheson	Dayne Steggles
05	12/10/2017	Revision Post Fire Incident + Update	Mark Hutcheson	Dayne Steggles
06	22/12/2017	Revision Post Fire Incident	Mark Hutcheson	Dayne Steggles
07	25/02/2019	Review Introduction content	Alycia Campbell	Heath Nowlan
08	5/11/2019	Review organisational chart	Alycia Campbell	Heath Nowlan
09	26/2/2020	Review organisational chart	Alycia Campbell	Heath Nowlan
10	05/11/2021	Annual Review	Alycia Campbell	Heath Nowlan
11	11/11/2022	Annual Review	Alycia O'Brien	Heath Nowlan
12	24/11/2023	Annual Review	Ewen McKenzie	Heath Nowlan
13	29/11/2024	Annual Review	Alycia O'Brien	Heath Nowlan
14	26/11/2025	Annual Review	Peter Murdocca	Heath Nowlan

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2 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.

3 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.

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.

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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.

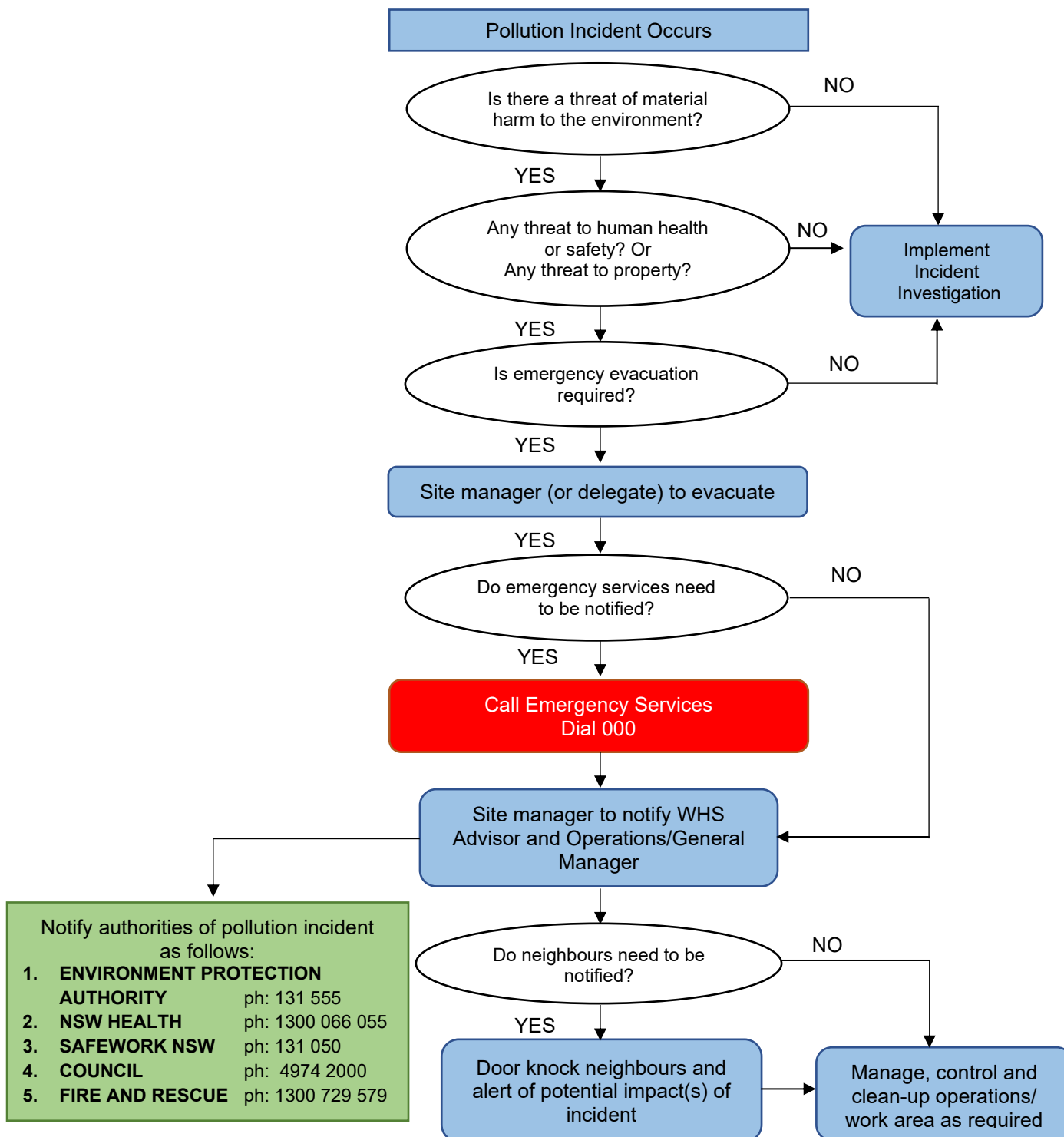
In relation to our operations, these pollution incidents are most likely to result from large fuel spills or acts of vandalism/arson to our equipment. If there is doubt, contact your site manager immediately. Immediately means immediately, promptly and without delay.

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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4 INITIAL RESPONSE PROCEDURE FLOWCHART



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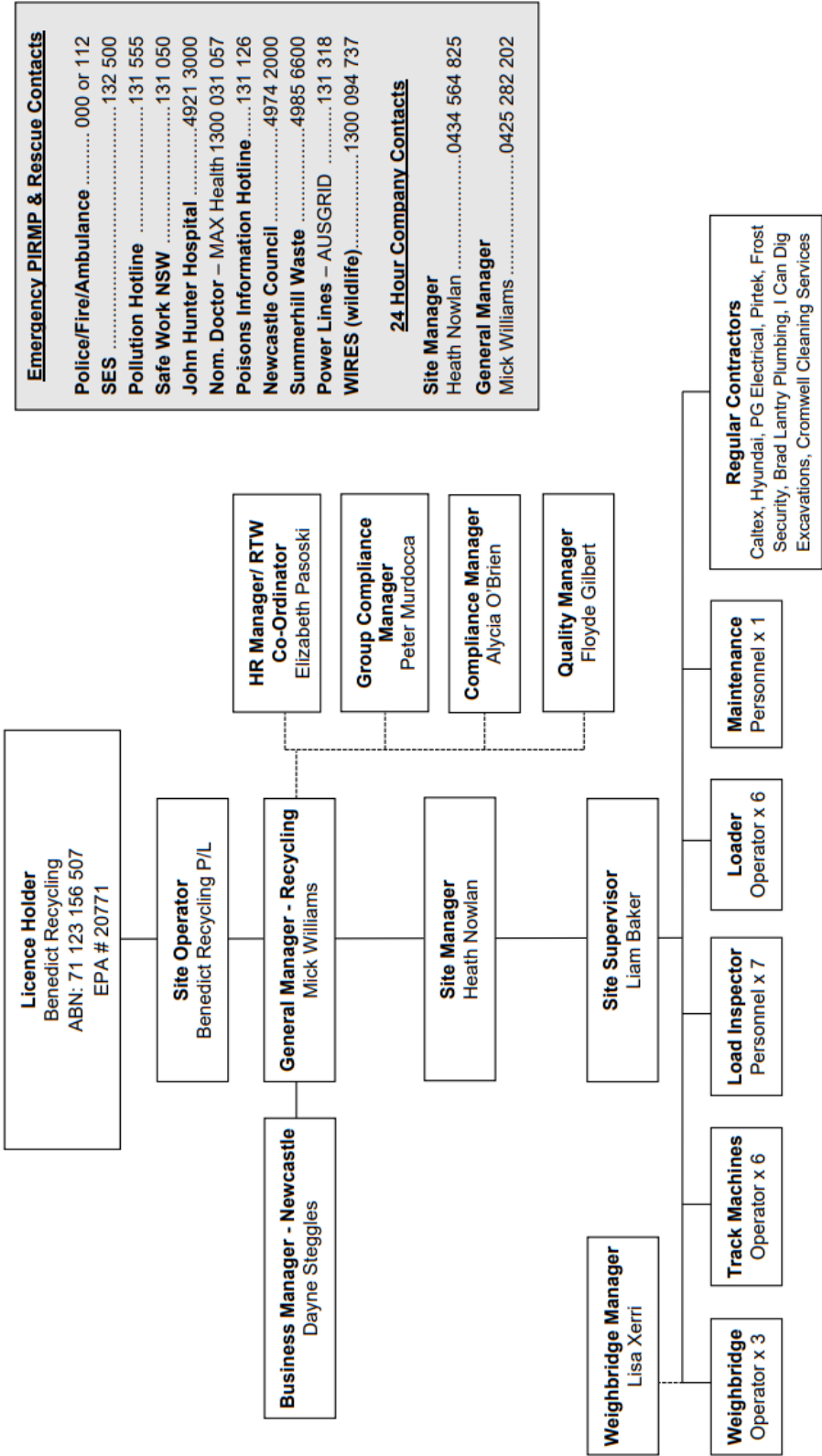


5 SITE CONTACT/ORGANISATIONAL CHART

Form 89.12

Newcastle Organisational Chart & Emergency Contacts

1a McIntosh Dr, Mayfield West, NSW 2304 T. (02) 4960 9977
GPS -32.88355, 151.73090



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6 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.

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):

- Water Contamination
- Noise Pollution
- Air Pollution
- Fire potential

6.1 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.

6.2 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
- Location of any stormwater drains on the premises	See Figure 2: Site Stormwater Directional Flows

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Figure 1: Site Location and Proximity to Sensitive Receivers

6.3 WATER CONTAMINATION

The primary objective of water contamination management at the premises is to ensure that stormwater gathered by the facility shall not adversely affect the site or its surrounds (local amenity). Stormwater gathered on site shall be managed to ensure it is not contaminated by pollutants or leachate and is free of sediment. The following main hazards exist at the premises in relation to water contamination:

- Storage of chemicals/hydrocarbons
- Storage of waste materials

Figure 2 below illustrates the general stormwater flows on site.

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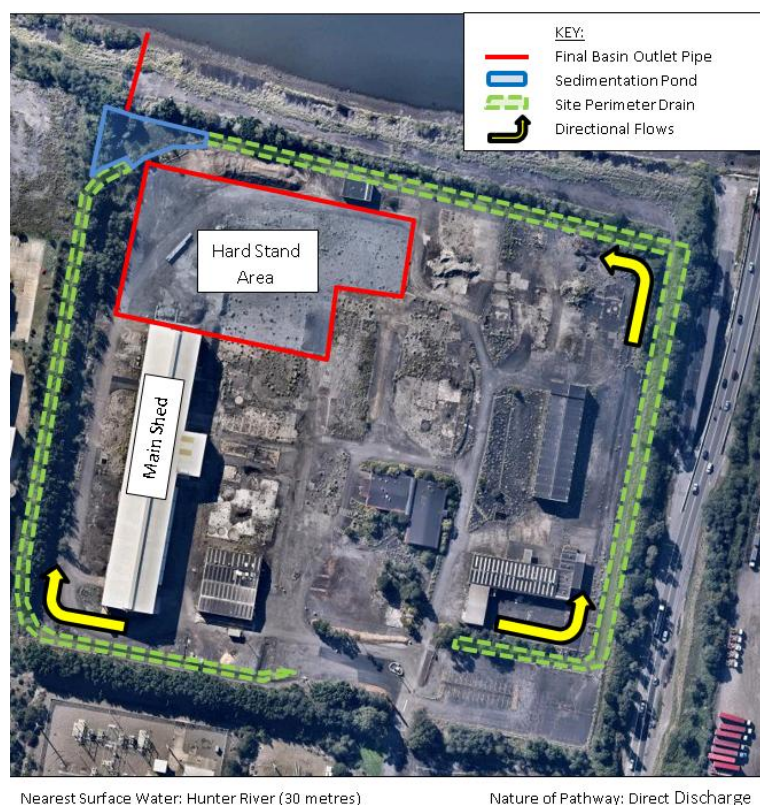


Figure 2: Site Stormwater Directional Flows

6.3.1 INVENTORY OF POTENTIAL 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	26,000 litres	Aboveground Self-Bunded tank	Adjacent to Bag House Shed Opposite Main Shed
Engine Oil	<500 litres	Minimal quantities/drums stored on portable pallet style bunds.	Shed beside weighbridge
Hydraulic Oil	<500 litres		
Mixed Waste	45,733 tonnes	Unprocessed and Un-recyclable waste stockpiles	Hardstand area north of Main Shed

Table 1: Potential Water Pollutants

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

The waste stored on site is comprised solely of non-putrescible waste, predominantly from building and demolition as well as commercial and industrial sources. Whilst the total authorised amount of processed and unprocessed waste allowed to be held on site at any time is 53,733 tonnes, the waste stored inside the main shed (8,000 tonnes) has not been included in Table 1 above.

6.4 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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6.5 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.

Sources of potential odour are essentially limited to waste stockpiles. In the case of this site, due to the fact no putrescible waste is accepted for processing/disposal, sources of odour would be limited to small amounts of vegetation matter that might be co-mingled in a load of mixed waste.

6.6 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.

6.6.1 INVENTORY OF FUELS AND COMBUSTIBLES

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

Fuel/Combustible	Maximum Quantity	Storage Method	Location
Diesel Fuel	26,000 litres	Aboveground Self-Bunded tank	Adjacent to Bag House Shed Opposite Main Shed

Table 2: Fuels and Combustibles Inventory

7 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):

- Water Contamination
- Noise Pollution
- Air Pollution
- Fire potential

7.1 WATER CONTAMINATION MITIGATION STRATEGIES

All hydrocarbon (fuel) sources that could potentially contaminate the waterways are kept in bunded areas to prevent spillages from reaching discharge points. 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 and at other locations on premises where the potential for chemical spills exists.

Stormwater from waste stockpile areas and surrounds is directed to a perimeter drain and sedimentation basin installed at the north-western corner of the premises to enable the settlement of any suspended solids before discharging from the premises (refer Figure 2).

Regular maintenance of all surface water structures including catch drains is carried out to ensure the capacity to capture sedimentation is maximised.

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7.2 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

7.3 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:

- Restricting stockpile heights in line with licence requirements to reduce the potential for dust generation
- Wetting stockpiled soils to minimise wind erosion
- Ceasing or reducing loading and unloading of stockpiles during strong wind conditions
- Spraying materials during the loading/unloading processes to suppress dust
- Ceasing or reducing processing activities during strong wind conditions
- Spraying of materials during processing activities
- Cleaning hardstand /roads by street sweeper
- All trucks passing through the wheel wash on exit

A network of remotely controlled sprinklers is installed on site which is activated as necessary throughout the working day, to wet down stockpiles and open yard areas in an effort to minimise the generation of air borne dust on site.

Whilst the premises does not accept putrescible waste, regular site monitoring for possible sources of odour is conducted and control activities implemented as required:

- Arranging prompt and regular removal of residual waste

Figure 3 below shows the location of the network of sprinklers on site.

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Figure 3 – Dust Suppression Sprinkler Location

7.4 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
- 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 that 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

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8 COMMUNICATING WITH NEIGHBOURS AND 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 Recycling 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.

9 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).

10 TESTING AND REVIEW OF PIRMP

This PIRMP is scheduled for routine testing and reviewing on an annual basis. The annual site Licence Anniversary Notice serves as the 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

Environmental Risk Register (Page 1)

Environmental Risk Register - Benedict Recycling									
Completed by: A. O'BRIEN									
Environmental Hazard	Description of Hazard/Incident	Likelihood	Consequence	Initial Risk Rating	Impact on Neighbours	Control Measures/ Corrective Action	Specific PPE / Equipment / Devices available	Likelihood	Residual Risk Consequence
Soil Contamination Incident - Diesel Fuel	Catastrophic failure of diesel fuel storage container/equipment resulting in major spill. e.g. punctured tank, valve failure, tank overfilled.	D 2	2	Medium	N/A	- Fuel storage tank is adequately bunded. - Traffic limitations in Fuel storage tank area of site. - Vehicles limiting/avoiding approach tank forward facing parking adjacent to tank. - Regular maintenance checks of valves. - Filling/refuelling procedures in place.	- Tank bunding - Signage	E 2	2
	Diesel spill outside of bunded area during refilling/fueling activities.	C 4	4	Low	N/A	- Spill kit in place.	- Spill Kit	D 4	4
	Diesel spill outside of bunded area from mobile plant fuel tank failure.	C 4	4	Low	N/A	- Site spill kit can be used or else sand/soil stockpiles nearby, which can be used to contain the spill in the short term.	- Spill Kit	D 4	4
	Diesel spill within bunded area due to leaking/open valve.	C 5	5	Very Low	N/A	- Spill kit in place. - Routine maintenance inspection of pipework/valves.	- Spill Kit	D 5	5
	Catastrophic failure of oil storage container/equipment resulting in major spill. e.g. punctured tank, valve failure, tank overfilled.	D 3	3	Low	N/A	- Oil storage containers are adequately bunded. - Traffic limitations in oil storage area of site (workshop). - Regular maintenance checks of valves.	- Pallet bunding - Signage	E 3	3
Noise Pollution	Oil spill outside of bunded area during delivery/decantering activities.	C 4	4	Low	N/A	- Spill kit in place.	- Spill Kit	D 4	4
	Oil spill outside of bunded area from mobile plant, hydraulic hose failure.	C 4	4	Low	N/A	- Site spill kit can be used or else sand/soil stockpiles nearby, which can be used to contain the spill in the short term.	- Spill Kit	D 4	4
	Oil spill within bunded area during delivery/decantering activities.	C 5	5	Very Low	N/A	- Spill kit in place. - Routine maintenance inspection of pipework/valves.	- Spill Kit	D 5	5
	Excessive noise generated by fixed plant and machinery. e.g. shredder, wash plant	D 4	4	Very Low	Yes	- Limiting the hours and types of operation to that which is approved. - Using stockpiles placed between machinery and boundaries as noise barriers. - Limiting machinery used to that which meets noise generation guidelines for this type of operation. - The correct operation and maintenance of machinery.	- Hearing protection for operators	D 5	5
Noise Pollution	Excessive noise generated by mobile plant and machinery. e.g. front-end loader, excavator	D 4	4	Very Low	Yes	- Limiting the hours and types of operation to that which is approved. - The correct operation and maintenance of machinery.	- Soundproofing in cabins of machinery. - Mobile plant fitted with 'squashed duck' reversing alarms.	D 5	5
	Excessive noise generated by maintenance activities. e.g. fabrication activities in workshop, servicing of mobile plant and equipment.	C 4	4	Low	Yes	- Conduct maintenance activities only within approved hours.	- Hearing protection.	D 5	5

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APPENDIX A

Environmental Risk Register (Page 2)

Air Pollution	Excessive odour from compost/manure stockpiles.	C 3	Yes	Medium	N/A	D 3	Low	Site Manager
	Excessive windblown dust from product stockpiles.	C 4	Yes	Low	- Eye protection.	D 4	Very Low	Site Manager
	e.g. dry product, pushing up stockpile, loading from tipping on stockpile.							
	Excessive windblown dust from extraction activities.	C 3	Yes	Medium	N/A	D 3	Low	Site Manager
	e.g. loading/unloading of dump truck.							
	Excessive dust emissions from fixed plant.	C 3	Yes	Medium	- Fixed sprinkler systems on plant.	D 3	Low	Site Manager
	e.g. dust generated by timber plant or sand/soil blending plant.							
	Excessive windblown dust from haul roads.	B 3	Yes	Medium	- Automated programmable sprinkler system. - Water Cart.	D 3	Low	Site Manager
Fire Potential	Ignition of Wood Waste raw feed stockpile.	D 3	Yes	Low	- Accepting only permitted wastes (no dangerous goods). - Maintaining machinery/equipment in good working order to minimise the risk of sparks. - Ensuring Wood Waste stockpiles do not exceed licence limits and are sufficiently dampened.	D 5	Very Low	Site Manager
	Ignition of Wood Waste finished product stockpiles.	D 3	Yes	Low	- Water Cart. - Fire fighting equipment (extinguishers, hose reels).	D 5	Very Low	Site Manager
	Diesel fire at fuel tank facility.	E 1	Yes	Medium	- Vehicles to be switched off whilst re-fuelling. - No naked flames/smoking in proximity of fuel tank facility. - Staff trained in fire fighting.	E 1	Medium	Site Manager
	General fire risk associated with fixed or mobile plant and equipment.	D 1	Yes	High	- Maintaining machinery/equipment in good working order to minimise the risk of sparks. - Ensuring Wood Waste raw feed stockpiles do not exceed licence limits and are sufficiently dampened.	D 2	Medium	Site Manager
	e.g. front-end loaders, excavators, dump trucks, wash plant, timber plant.							

Risk Matrix

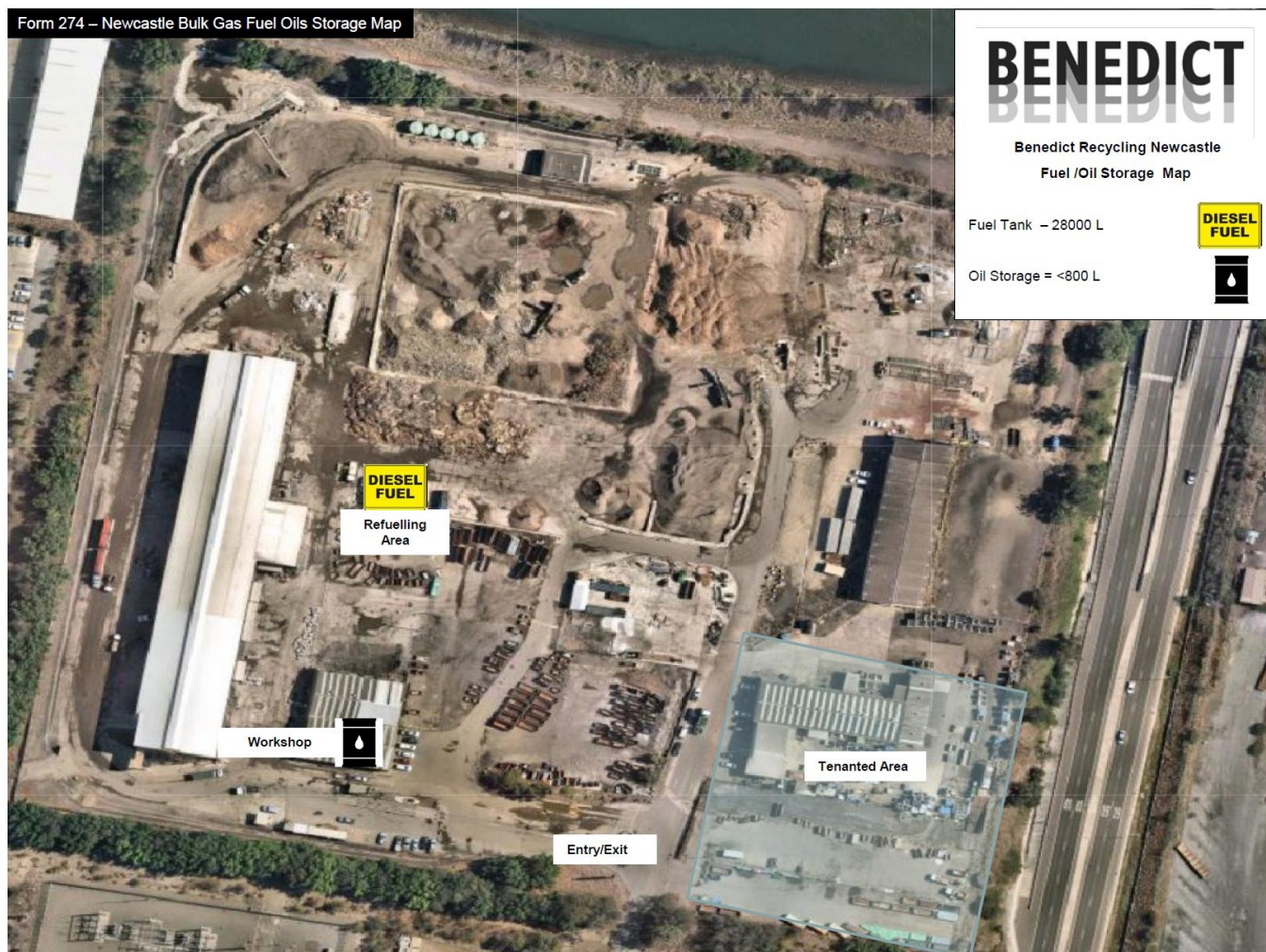
PROBABILITY (Likelihood of Occurrence)	CONSEQUENCE (Severity of Result)				
A. Expected to happen	1. Permanent/severe environmental impact	High	High	High	High
B. Common	2. Significant environmental impact	High	High	High	High
C. Sometimes	3. Moderate environmental impact	High	High	High	High
D. Rarely	4. Minor environmental impact	Medium	Medium	Medium	Medium
E. Highly Unlikely	5. Low level impact to the environment	Medium	Medium	Medium	Medium

Hierarchy of Controls

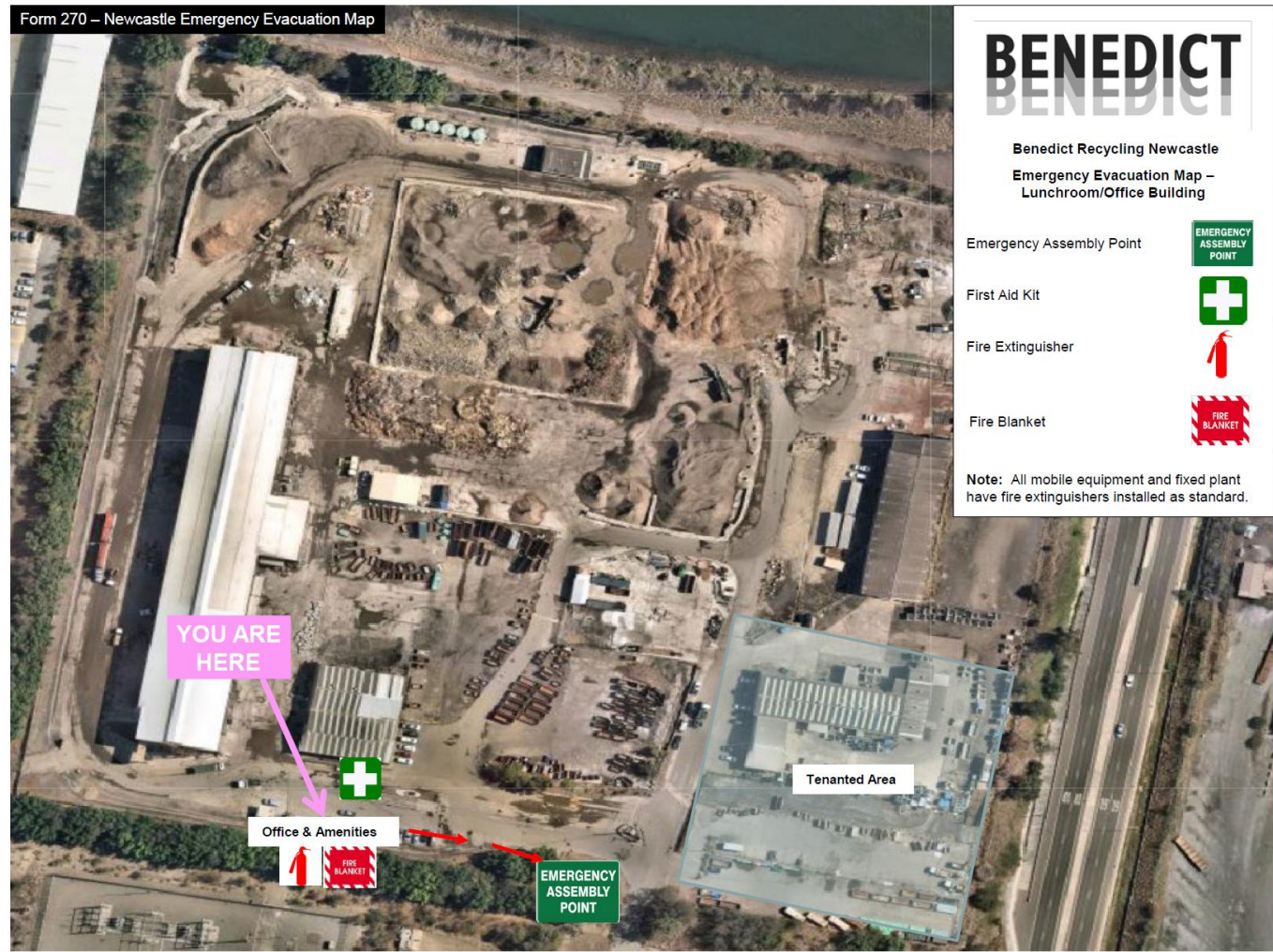
Elimination	Most Effective
Substitution	
Engineering	
Administrative	
PPE	Least Effective

Risk Assessment Rankings

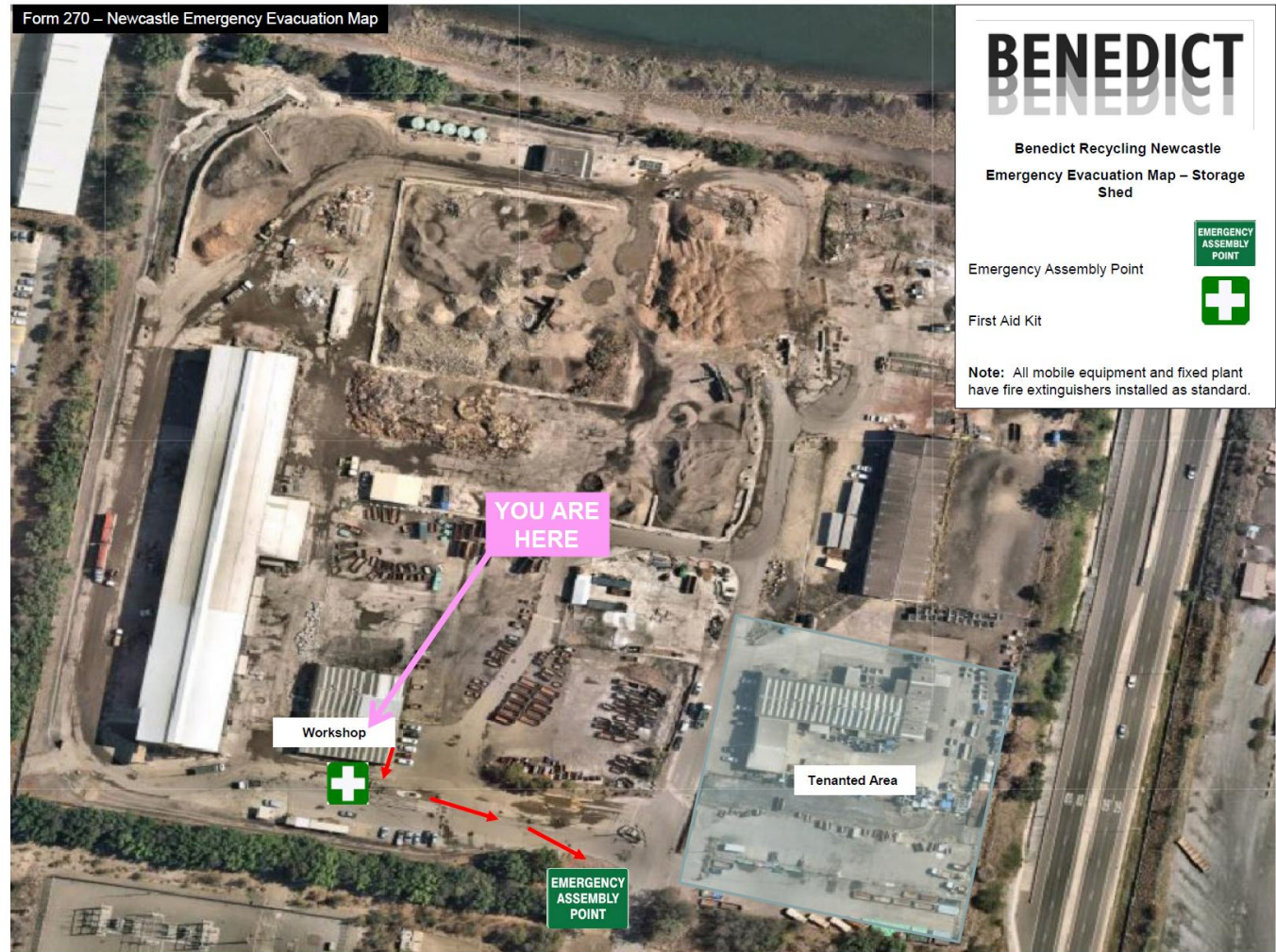
High	Consult with your Manager for further review and approval
Medium	Consult with your Supervisor for further review and approval
Low	Complete the task
Very Low	Complete the task

PIRMP – Newcastle**APPENDIX B****Bulk Fuels and Combustibles Location Map**

Fire Fighting Equipment Location Map



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APPENDIX D

Site Training Record Sheet

Form 275.1

Training Record

BENEDICT

Training Scope:	Pollution Incidents and the Pollution Incident Response Management Plan (PIRMP)			
Location:		Date/s:		
Trainer:		Duration:	<i>Total Hrs/Mins:</i>	
Principle Areas Covered in Session/s:	Environmental Impacts, Examples of Pollution, Benedict Environmental Procedure, Pollution Incident Response Management Plan (P.I.R.M.P), When and how to report a pollution incident, ensuring all your contact details are up to date and saved in your phone			
Practical Training Provided:	N/A			
Assessment Undertaken:	Form Number:		Title:	
Training Material Reference:	Form Number:		Title:	PIRMP (Powerpoint presentation)
Material Provided to Participants:	Form Number:		Title:	PIRMP Procedure card
Trainee/s:	Name (Print)	Signature	Name (Print)	Signature
	1.		11.	
	2.		12.	
	3.		13.	
	4.		14.	
	5.		15.	
	6.		16.	
	7.		17.	
	8.		18.	
	9.		19.	
	10.		20.	