



Pollution Incident Response Management Plan Dival's (Carrick) Quarry

(in the case of a pollution event refer to Table 4.1)

Document Number: PIRMP

Status: Approved

Version: 2.4

Effective: 09/12/2014

Review: 1 Year

Owner: Andrew Dival

1. Introduction

1.1. General

The *Protection of the Environment Operations Act 1997* requires holders of EPL's to prepare and implement a Pollution Incident Response Management Plan (PIRMP) for each licensed activity. Denrith Pty Ltd is the holder of Environmental Protection Licence (EPL) 20211 for the Divall's Quarry, which comprises an open cut gravel quarry and the licensed activities of:

- Extractive activities (>10000 – 50000t annual capacity to extract or process).
- Crushing, grinding or separating (>10000 – 50000t annual processing capacity).

The objectives of the PIRMP are to:

- To ensure timely and comprehensive communication of a pollution incident to staff, relevant authorities and all other stakeholders affected by the impacts of a pollution incident;
- To identify risks and develop actions to minimize and manage these risks; and
- To ensure the plan is implemented by trained staff and tested regularly for accuracy, currency and suitability.

1.2. Potential Pollution Risks

The potential pollution risks relevant to the activities of the Divall's quarry have been identified as:

- Spills (e.g. hydrocarbon, hazardous chemicals, etc) resulting in land contamination;
- Spills (e.g. hydrocarbon, hazardous chemicals, saline, or sediment laden water, etc) resulting in water contamination;
- Major water discharge (for example dam or pipeline failure);
- Fire (for example spontaneous combustion fires associated with green waste); and
- Explosions (only associated with explosive storage on site).
- Air pollution. This includes dust from crushing and transport operations.
- Noise pollution. This includes noise generated by crushing and transport operations.

The likelihood of environmental hazards occurring at Divall's Quarry has been captured through the Divall's Quarry Environmental [Risk Assessment](#), with the management of impacts prioritised according to the level of risk each aspect is assigned. The risk assessment is reviewed annually in accordance with ISO14001:2015 Environmental Management and ISO 31000:2009 Risk Management.

1.3. Location

The surrounding area is predominantly rural farmland, however there are nearby residents and environmental features which may be impacted by a pollution incident occurring at the Divall's Quarry, in addition to the premises itself:

- landholders adjacent to the mine complex considered to be sensitive receivers (Figure 1);
- downstream water courses (including inundation areas and adjacent landholders): Osborne Creek, Towrang Creek, which subsequently flow into the Wollondilly River (Figure 2); and
- nearby localities.

Adjacent Landholders:

There are three rural residential receptors located within approximately 1 km of the Divall's Quarry. These receptors were identified as sensitive receivers for potential air (dust) and noise impacts during studies

conducted in 2021 by Harwood Acoustics (Air Quality Impact Assessment) and SLR (Environmental Noise Impact Assessment) and are as follows:

Receptor ID	Property ID	Distance from Divall's Quarry
R1*	282 Carrick Road	750M northeast
R2	63 Curlewin Lane	1,200m southeast
R3*	51 Tiyces Lane	700m south-southwest

*Denotes residences which are owned by Denrith Pty Ltd, T/A Divall's Earthmoving and Bulk Haulage.



Figure 1 – Location of Sensitive Receivers

Downstream Water Courses:

As shown in Figure 2 below, there are two streams in the vicinity of the quarry, both of which flow to the Wollondilly River; Towrang Creek and Osborns Creek. Activities within the quarry only have the potential to affect Towrang Creek which is downstream from the quarry. Towrang Creek flows into the Wollondilly River, as shown below in Figure 2.



Figure 2 – Downstream Water Courses

Nearby Localities:

Figure 3 shows the location of the quarry in a regional context, while Figure 4 shows the quarry location in the local context including neighbouring Lots and DPs.

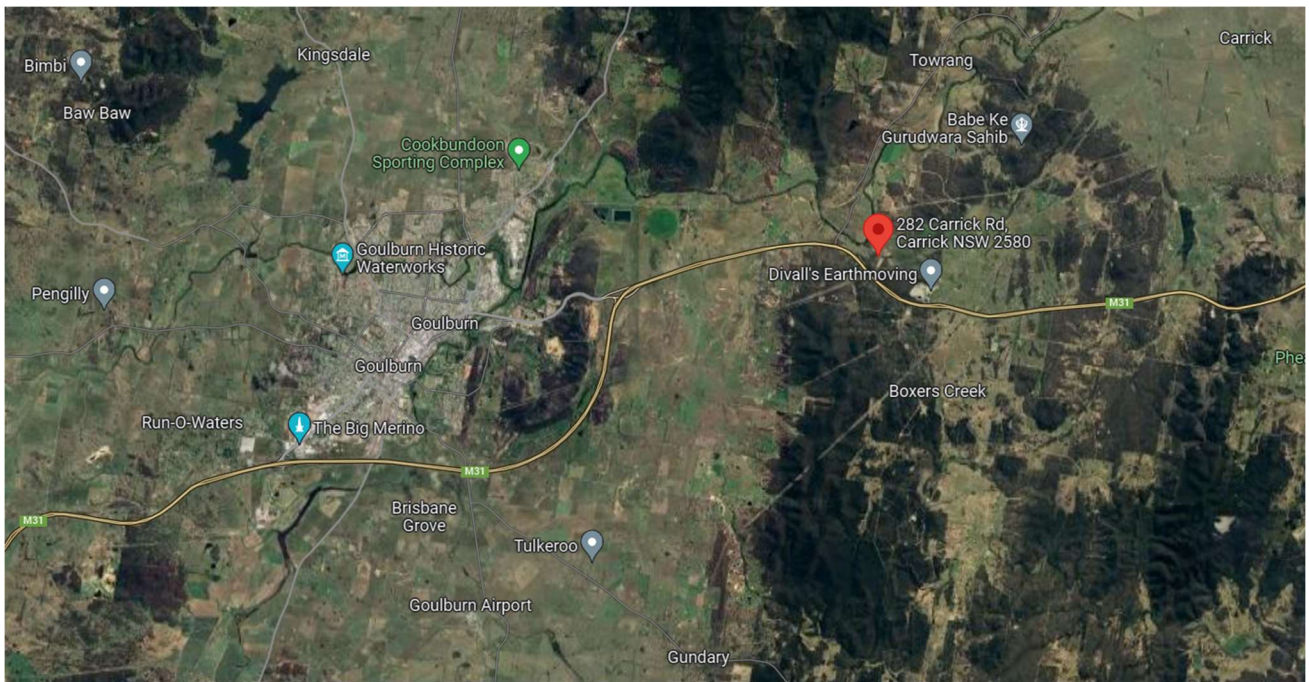


Figure 3 – Regional Context

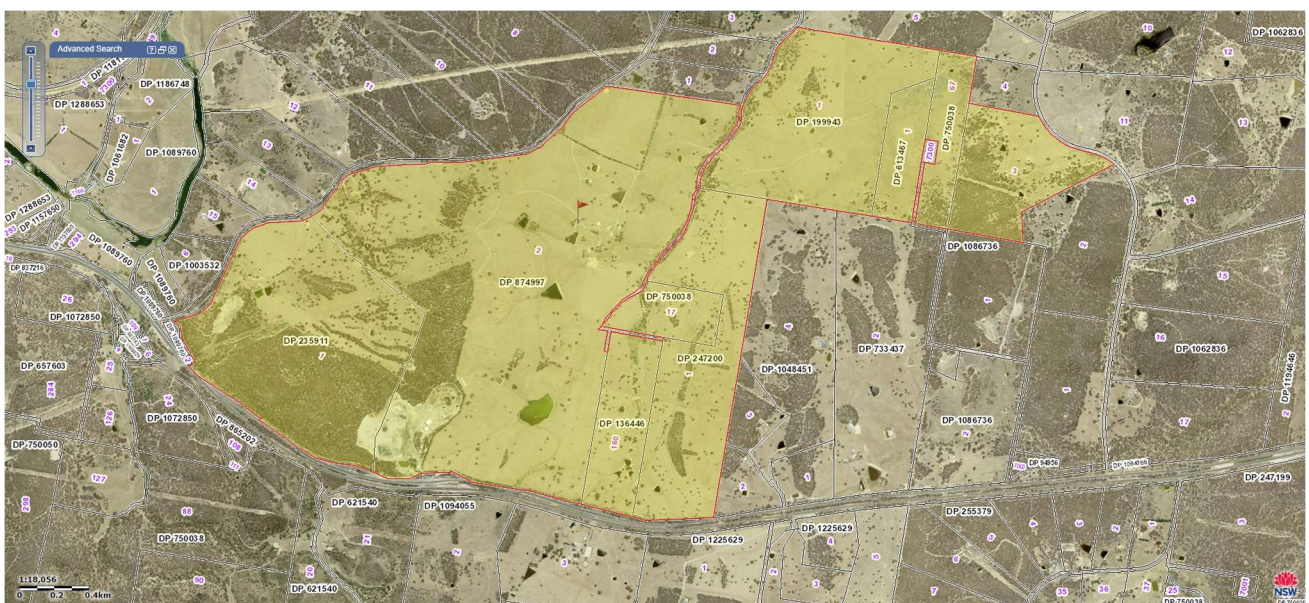


Figure 4 – Local Context

1.4. Chemicals and Potential Pollutants

All chemicals at the Divall's Quarry are included in a [central register](#) available on the intranet (known as the company BMS). All chemicals are accompanied by the relevant Safety Data Sheets as required by work health and safety regulations. Safety Data Sheets are also stored on the intranet site and include Personal Protective Equipment (PPE) required for handling the chemical.

The facilities that store fuel, oil and hazardous chemicals have been designed in accordance with Australian Standard 1940 – 1993. The system has been designed to include computerised controls for the purpose of monitoring and identification of faults.

Explosives on an internal leased site are stored in licensed explosive magazines in accordance with Safe Work NSW requirements. The lessees Dangerous Goods Licence cover the storage of these materials.

Potential pollutants created as part of mining operations, and thus excluded from stores registers, include:

- mine tailings;
- mine water (storm water and dust wash catchment);
- sediment laden surface water runoff from disturbed areas.

These materials are in a constant state of flux as a result of mining operations. Risks associated with these potential pollutants are incorporated into the risk register detailed discussed above.

Appendix 2 displays the location of potential pollutants including tailings dams, sediment dams' pipelines and fuel storage locations.

2. Management and responsibilities

2.1. Legal and Company Requirements to Notify

Divall's employees and contractors are responsible for alerting management personnel to all environmental incidents or hazards which may result in an environmental impact, regardless of the nature or scale.

Notification responsibilities are detailed in the POEO Act 1997 (Section 148), which encompasses all site personnel, including contractors and sub-contractors. These can be categorised broadly as:

the duty of employee or any person undertaking an activity:

- Any person engaged as an employee or undertaking an activity (at the Divall's Quarry) must, immediately after becoming aware of any incident that is believed to cause or threaten to cause material harm to the environment, notify their relevant manager of the incident and all relevant information about it. This is to be undertaken as per Section 5.2; and

the duty of Divall's to notify:

- As the employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a pollution incident, Divall's must undertake notification to the appropriate regulatory authority of any "material harm incidents", including relevant information. Notification shall be undertaken by the Managing Director or Site Manager as per Section 3.2

2.2. PIRMP Management

The specific responsibilities associated with the management and implementation of the PIRMP are outlined in Table 2.1.

Table 2.1 PIRMP Management Responsibilities

Name	Contact details	Position	Responsibility
Mr Andy Divall	02 4829 2000	Managing Director	- responsible for activating the plan, and authorised to notify relevant authorities under section 148 of the Act, and - is responsible for managing the response to a pollution incident,
Mr Ritchie Mason		Crushing Manager	- authorised to notify relevant authorities under section 148 of the Act, and - is responsible for managing the response to a pollution incident,

Ms Tracy Fry		WHSE Manager	- authorised to notify relevant authorities under section 148 of the Act, and - is responsible for managing the response to a pollution incident,
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3. Incident Management

As per the POEO Act, Divall's defines a pollution incident as;

“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.”

All possible actions should be taken to control the pollution incident in order to minimise health, safety, and environmental consequences. These actions, to the maximum extent possible, aim to:

- provide for the safety of people at and within the vicinity of the site, and
- contain the pollution.

The actions to be implemented at the Divall's (Carrick) Quarry on the occasion of an incident include the following:

1. Secure the scene and contain the incident.
2. Determine if Notification is required – Refer to [Procedure HSE.10 – Reporting and Investigation of Accidents and Incidents](#):
3. Gather information (i.e., environmental monitoring).
4. Determine the investigation level.
5. Commence an Investigation (if required). As per:-

[HSE.10 - Reporting and Investigation of Accidents and Incidents-](#)

Arrangements for minimizing risk of harm to people and the environment as a result of a pollution incident, and for containing or controlling a pollution incident, are included in the following documentation:

Spill Procedure [OPC-EP-04-20](#)

As a minimum, static spill kits are stored adjacent to major fuel storage locations. The location of static spill kits is shown on Appendix 2. Emergency and incident response procedures to be followed in the event of an incident/emergency are also included in the following plans,

[Site Emergency Management Plan \(Divall's \(Carrick\) Quarry\)](#)

The management plan documents the roles and accountabilities of key personnel at each operation in the event of an emergency and the contact details for appropriate emergency services. The plan also provides designated evacuation points and procedures in the event of an emergency. Any changes to emergency procedures are documented and communicated to all personnel.

With regards to the specific major hazards identified in Section 1.4, the following emergency procedures have been developed:

Spills (e.g., hydrocarbon, hazardous chemicals, etc.) resulting in land and or water contamination;

Spill Procedure [OPC-EP-04-20](#)

Major water discharge (for example dam failure);

TBA

Fire (Machine maintenance and repair procedures);

Explosions;

TBA

All Divall's (Carrick) Quarry employees and contractors receive emergency preparedness and response training during their site familiarisation induction under-

[HR.01 - Induction of New Employees](#)

[HR.02 - Training and Competency of Employees](#)

Controls of Personal Protective Equipment (PPE) and incident containment and control equipment are detailed in relevant SDS, relevant management plans and in risk assessments, these include but are not limited to:

- emergency spill kits;
- portable pumping infrastructure;
- earth moving plant;
- floating booms and silt curtains; and
- erosion and sediment control materials.

4. Notification Procedures

4.1. Determination of Material Harm

The POEO Act requires that pollution incidents causing or threatening material harm to the environment must be notified immediately to the relevant authorities. "Material harm to the environment" is defined 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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

The determination of a material harm incident will be made by the Managing Director in consultation with the Site Manager. If the Managing Director is not available immediately, the determination will be made by the Site Manager.

4.2. Internal and External Notification

In the event of an incident, response and notification internally must be undertaken as per company procedure:-

HSE.10 – Reporting and Investigation of Accidents and Incidents

The contact details of each relevant authority referred to in Section 148 of the POEO Act, are listed in Table 4.1. Note, the agencies listed in Table 4.1 must be contacted in the order listed:

Table 4.1 PIRMP Notification Contacts

<u>Contacts List</u>	Phone Number
<u>Fire and Rescue NSW</u>	000 (To be contacted first in this order if the incident presents an immediate threat to human health or property and emergency services are required, or last in this order if emergency response is not required.)
<u>NSW Environment Protection Authority</u>	131 555 or http://www.epa.nsw.gov.au/contact/index.htm
<u>Goulburn Base Hospital</u> The Ministry of Health via the Public Health Unit Goulburn	(02) 4827 3111
<u>Safe Work NSW</u>	13 10 50
<u>Local Council</u> (Goulburn Mulwaree)	(02) 4822 4444
<u>Towrang Brigade Rural Fire Service</u>	(02) 4829 8271 (if required)
<u>Marulan Rural Fire Service</u>	(02) 4841 1929 (if required)

Immediately is taken to mean 'promptly and without delay'. The decision on whether to notify of the incident in accordance with Part 5.7 of the POEO Act should not delay immediate actions to provide the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe to do so

Record keeping of incident details, including investigations and outcomes, will be undertaken in accordance with company procedures:-

Adm.03 Management and Control of Records and Data

Procedure HSE.10 – Reporting and Investigation of Accidents and Incidents

After initial notification of any material harm incident, it will be the responsibility of the Managing Director to liaise with any authority listed in Table 4.1 that requests additional information or is providing directions for management of the material harm incident. This may include incident investigation reports and ongoing environmental monitoring results.

4.3. Notification to Local Landholders and Community

Community notification shall be undertaken at the determination of the Managing Director or Site Manager and may be based on environmental monitoring results. Names and contact details of stakeholders, including local and downstream residents are retained by the Managing Director. The following notification methodology is proposed to be utilised as required:

- early warnings: same day telephone notification to landholders who may be affected by the incident over the subsequent 24-hour period; and
- updates: follow up phone calls to all landholders who may have been notified by the initial early warning. Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, Divall's website, media statements or any other strategy as defined in;

HSE.01 Consultation and Communication

Information provided to the community will be relevant to the incident and may include the following details:

- type of incident that has occurred;
- potential impacts local landholders and the community;
- site contact details; and
- Advice or recommendations based on the incident type and scale.

The community will be notified when all steps have identified that there is risk of material harm from the incident;

1. Farmers will be notified by phone or by site consultation to advice against irrigation and water extraction from rivers or dams
2. Community will be notified by phone or radio broadcast in area of important information or if evacuation is necessary
3. After incident, all persons, including Farmers, in the community, will be notified by phone, site consultation or radio broadcast in area. This is so further concerns and communication of the event can be relayed to all persons affected.

5. Training, Testing and Communication

5.1. Training

All personnel affected by the content of this document will receive instruction or explanation on the relevant parts of the document as per:

HSE.01 Consultation and Communication

HR.02 - Training and Competency of Employees

Incident management and emergency response shall be included in all Divall's Generic and Complex site inductions.

Additionally, routine training exercises may involve the employees responding to a simulated emergency but may also include expanded simulations that involve other (or all) site personnel and external response agencies (Ambulance, Fire, Mines Rescue etc).

All training records, including the name of the person undertaking training and date of training, shall be maintained in compliance with:

HR.02 - Training and Competency of Employees

Adm.03 Management and Control of Records and Data

5.2. Testing, Review and Maintenance

The testing of the 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. Testing shall be undertaken in the following ways:

The PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training requirements. A review of the PIRMP will occur every 12 months commencing from the date of authorisation by the Divall's Compliance and Assurance Officer. Contact details in this document must be kept current at all times. The PIRMP will be reviewed within one month from the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to provide the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Records will be kept in accordance with:

Adm.03 Management and Control of Records and Data

and will be included in Appendix 4 of this plan. Information regarding testing includes:

1. The manner in which the test was undertaken;
2. Dates when the plan has been tested;
3. The person who carried out the testing; and
4. The date and description of any update of or amendment to the plan (Section 7.1).

5.3. Availability of the PIRMP

The PIRMP shall be kept in written form at the EPL premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) on request.

The PIRMP will be made publicly available within 14 days of finalisation (taken to be authorisation of the PRIMP by the Managing Director) via the Divall's website, in a prominent position and on a publicly available page.

No personal information (within the meaning of the Privacy and Personal Information Protection Act 1998) will be made publicly available as part of the PIRMP.

6. Accountabilities

Role	Accountabilities for this document
Managing Director	Responsible for undertaking notification as defined in this PIRMP. Responsible for managing the response to a pollution incident. Responsible for coordinating communications with affected community members. Responsible for authorising the PIRMP and all subsequent updates. Responsible for providing adequate resourcing for implementation of the PIRMP. Authorised to liaise with the relevant authority.

Crushing Manager	Responsible for managing the response to a pollution incident. Responsible for coordinating communications with affected community members. Authorised to liaise with the relevant authority.
Training Manager	Responsible for coordinating communications with affected community members. Authorised to liaise with the relevant authority.
WHSE & Compliance Manager	Responsible for arranging testing and updating of the PIRMP. Responsible for notification and training of PIRMP.
Compliance and Assurance Officer	Responsible for arranging testing and updating of the PIRMP.
Company Secretary	To provide assistance and alert other people who may be in the vicinity of any incident.

7. Document Information

Property	Value
Approved by	Mr Andrew Divall
Document Owner	Mr Andrew Divall
Effective Date	09/12/2014
Keywords	PIRMP, Pollution, Incident Response, Environmental Incident, Spill

7.1. Version Register

Version	Date reviewed	Review team (consultation)	Nature of the amendment
1	23/07/2013		Creation.
2	20/07/2017	Richard Kirkwood	Review/Major Re-Write/ Re-Issue.
2.1	14/05/2020	Caleb Fisher	Added testing history.
2.2	22/04/2021	Tracy Fry	Review/updated spill procedures/updated photographs.
2.2	30/08/2021	Tracy Fry	Added Testing history.
2.3	27/05/2022	Tracy Fry	Updated BMS links throughout document. Updated photos and site maps.
2.4	15/05/2023	Tracy Fry	Updated contact details.

Appendix 1 – Site Location and Surrounding Areas

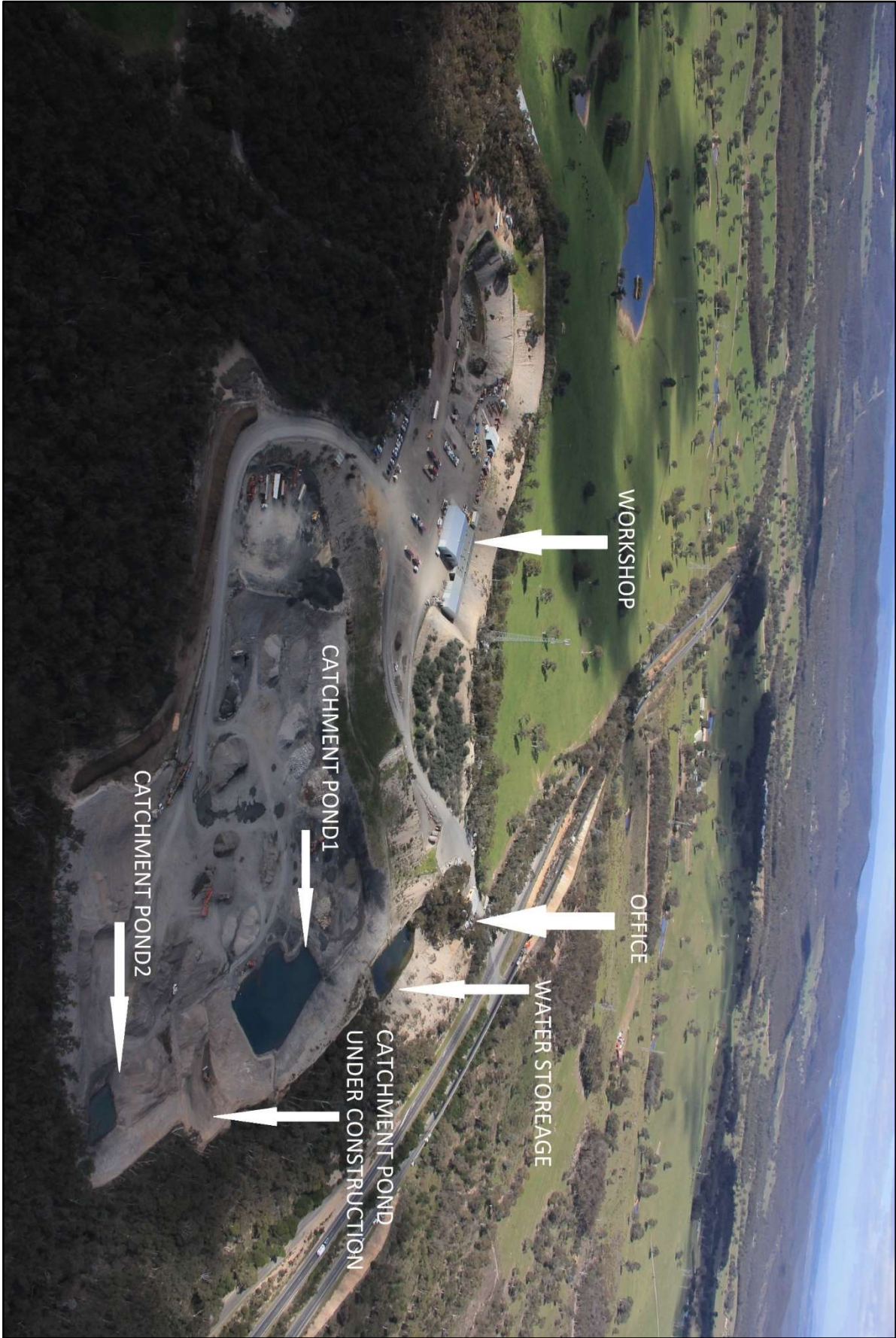


Figure 1 – Location of Sensitive Receivers

Appendix 2 – Potential Pollutants



Appendix 3 – Recent Drone Photo



Appendix 4 - PIRMP testing history

Date	Review team	Nature of the test	Actions/Comments
09/12/2014	Peter Waugh	Oil Leak from Machine on Quarry Floor	Area Bunded, Machine Fixed, Gravel scrapped up and disposed of.
07/07/2015	Operator	Fuel spill from loader on Quarry Floor	Spill Kit Used to clean up, gravel scrapped, Both disposed of.
25/07/2016	Operator/ Repairer	Machine started making loud noise, was shut down and inspected. Found faulty bearing, machine tagged out for repair	System worked well, no problems.
20/07/2017	Richard Kirkwood	Desktop Review	Complete Review and re write of PIRMP.
07/05/2020	Operator/ Caleb Fisher	Tested response for diesel discharge onto the quarry floor from the refuelling cart.	Fuel was contained with earthen bund. (Actual) All relevant persons in the contact list of this plan were contacted. (Simulated) Plans were made to remove the contaminated area and send to GMC tip as contaminated product. (Simulated)
27/08/2021	Tracy Fry	Tested response for a large chemical spill, including evacuation of nearby workshop and quarry personnel.	Drill went well, staff knew where evacuation points were located, evacuation was completed very efficiently. Staff demonstrated good knowledge of clean-up and notification procedures.
20/08/2023	Tracy Fry	Tested response for hydraulic oil discharge on quarry floor.	Workers were aware of spill procedure and location of equipment for clean up.
25/08/2023	Tracy Fry	Tested response for chemical spill in the workshop, requiring evacuation of the entire workshop due to risk of fire.	Drill went well; however one new staff member was not listed on the "In/Out" board. This has been rectified. Some improved warning system for the welding bay will also be investigated. Current procedure requires each area is manually checked for workers to be advised of evacuation as an interim. Welding bay requires ear and eye protection so audible or visual alarms may not be effective.

Appendix 5 – Legislative Compliance

The Protection of the Environment Legislation Amendment Act 2011 (PELA) received assent on 16 November 2011 resulting in changes to the Protection of the Environment Operations Act 1997 (POEO Act). The intent of the PELA is to improve the way pollution incidents are reported and managed. Provisions include a requirement for holders of Environmental Protection Licences (EPLs) to prepare, keep, test, and implement a Pollution Incident Response Management Plan (PIRMP). The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this legislation requires the following:

- holders of EPLs must prepare a pollution incident response management plan (section 153A, POEO Act);
- the plan must include the information detailed in the POEO Act (section 153C) and the POEO(G) Regulation (clause 98C) and be in the form required by the POEO(G) Regulation (clause 98B);
- licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act);
- licensees must test the plan at least every 12 months and after a pollution incident in accordance with the POEO(G) Regulation (clause 98E);
- and if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened within the meaning of Part 5.7 of the POEO Act, licensees must immediately implement the plan (section 153F, POEO Act).

As the holder of EPL 20211, Divall's Quarry, is required to comply with the POEO Act; as such, this document has been developed to satisfy the PIRMP requirements documented above.

This document also details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act (see Section 4.1).

Regulatory Requirements

Specific detail is required for inclusion in the PIRMP. Tables 5.1 and 5.2 lists information mandated under Section 153C of the POEO Act and clause 98C of the POEO (G) Regulation and details where this information is located in this document. Actions to be taken immediately, during and after an incident on site.

Table 5.1 Document Directory (The Act)

Legislation: PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997 – Chapter 5, Part 5.7A		
Section 153C	Detailed Required	Location in Document
a)	the procedures to be followed by the holder of the relevant Environment Protection Licence in notifying a pollution incident to;	
	i. the owners or occupiers of premises in the vicinity of the premises	4.3
	ii. the local authority for the area in which the premises relate are located and any area affected or potentially affected	4.2
	iii. any persons or authorities required to be notified by Part 5.7A	4.2
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	3.0
c)	the procedures to be followed for coordinating any action taken in combating the pollution caused	3.0, 4.2
d)	any other matter required by the regulations	(refer table 5.2)

Table 5.2 Document Directory (The Regulations)

Legislation: Legislation: PROTECTION OF THE ENVIRONMENT OPERATIONS (GENERAL) REGULATION 2009- Chapter 7, Part 3A		
Section 98C(1)	Detailed Required	Location in Document
a)	a description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity"),	1.3
b)	the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	1.2
c)	details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,	1
d)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	1.3
e)	the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,	1.3
f)	a description of the 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,	1.3 3.0
g)	the names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident,	2.2
h)	the contact details of each relevant authority referred to in section 148 of the Act,	4.2
i)	details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,	4.3
j)	the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,	3.0
k)	a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,	1.1,1.2 1.3, Appendix 1, 2 and 3
l)	a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates, and the action to be taken during or immediately after a pollution incident to reduce that risk,	3.0
m)	the nature and objectives of any staff training program in relation to the plan,	5.1
n)	the dates on which the plan has been tested and the name of the person who carried out the test,	Appendix 4
o)	the dates on which the plan is updated,	7.1
p)	the manner in which the plan is to be tested and maintained.	5.2