ABN: 66 008 709 608

Pollution Incident Response Management Plan (PIRMP)

Rosehill Sustainable Road Resource Centre

11 Devon Street Rosehill NSW 2142

Document Preparation and Control	Document Review
Dale Thomas - Environmental and Sustainability Manager Helen Dickinson – Quality & IMS Co-ordinator – Fixed Plant	Colin Biggs - Environmental and Sustainability Advisor
Document Approval	**Signature**
Paul Sherry - Production Manager	

Site Document Code	Latest Version Number	Latest Version Date
NSWPR-EN-PN126	1.1	06/09/2022

Document Version History			
Version No.	**Date**	**Document Status**	**Brief Description of Change(s) from Previous Version**
1.0	07/04/2022	Final	New Operational Site
1.1	06/09/2022	Final	Post Incident Review

TABLE OF CONTENTS

1 PURPOSE AND SCOPE

The purpose of this plan is to ensure that systems are in place at the site to minimise the potential impacts associated with pollution incidents events. In order the streamline the processes onsite, the term "*pollution incident"* is considered an emergency event.

If an emergency event occurs the priorities must be:

1. The safety of all persons on site (including visitors and contractors).
2. The safety of nearby residents.
3. Minimum impact on the environment.
4. Normal business operations are returned to normal as soon as possible.

The scope of activities conducted at this site includes, but not necessarily be limited to work relating to the following activities:

- Asphalt Production
- Material Repurposing (Reconomy)
- Recycled Asphalt Repurposing (RAP)
- Quality Testing (Laboratory)

As an Environmental Protection Licence has been granted to the site, a Pollution Incident Response Management Plan (PIRMP) has been developed to meet the conditions to comply with Part 5.7A of the *Protection of the Environment Operations (POEO) Act 1997*.

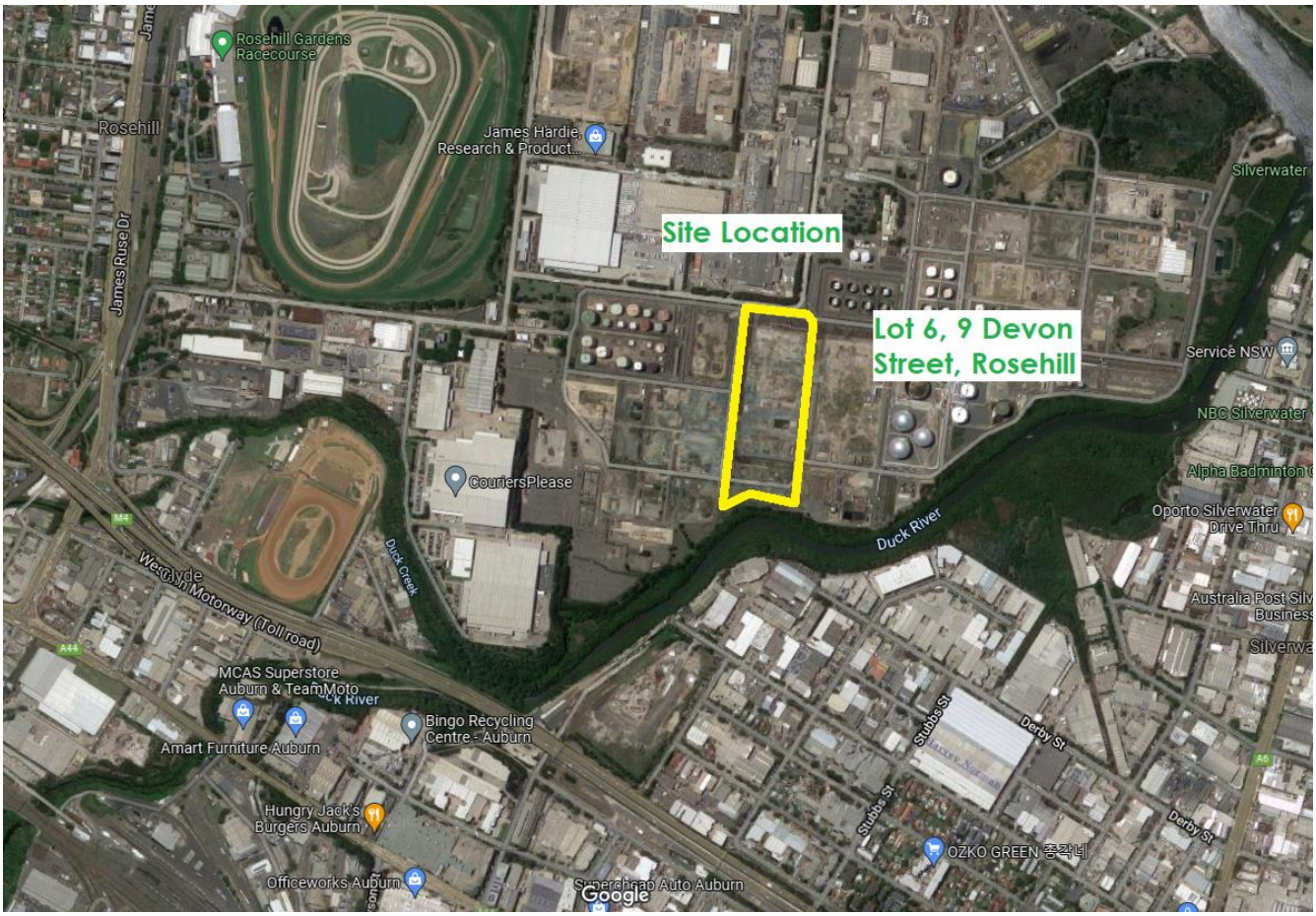
In order to meet this requirement, the following document had been developed for implementation at the Licenced site for the activities carried out on the site.

2 SITE EMERGENCY PROFILE

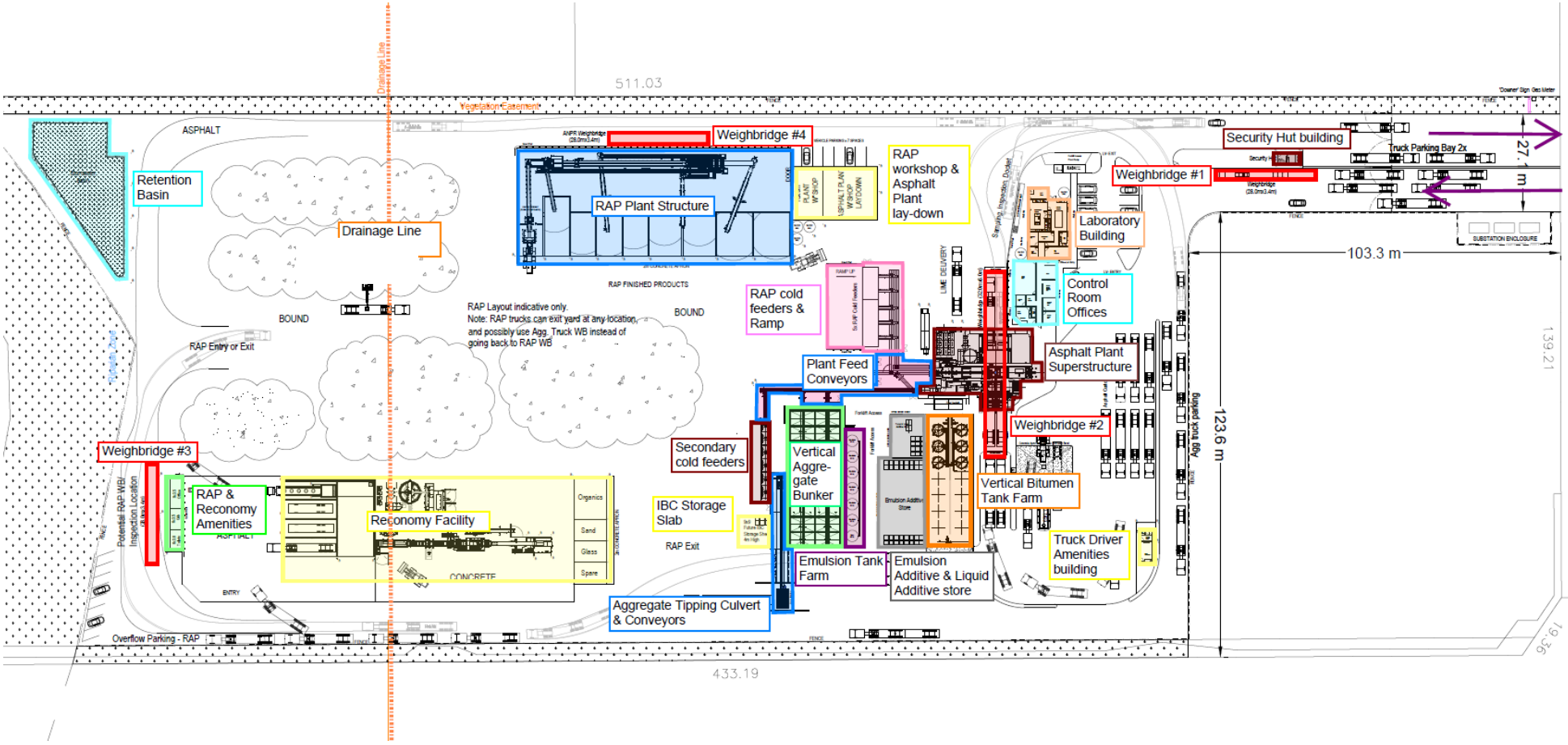
2.1 Site Details

Site Name:	Sustainable Road Resource Centre		
Address:	11 Devon Street, Rosehill NSW 2142		
Phone:	02 9897 4338		
Buildings and Structures:	▪ Security Hut ▪ Single Floor Production Office and Laboratory Building ▪ Dangerous goods container ▪ Laboratory Storage container ▪ Drivers Lounge ▪ Diesel Tank ▪ Rotary Drier / Mixer ▪ Cold Feed Bins and Conveyors ▪ Fly Ash/Lime/Silos ▪ Asphalt Plant Electrical Control Room ▪ Bitumen Tank Storage ▪ Vertical Bunkers Structure ▪ Toner Liquid Additive Store Shed ▪ Emulsion Tank Storage		
Buildings and Structures (continued):	▪ IBC Storage Shed ▪ Detritus Recycling (Reconomy) Structure ▪ Reconomy Amenities ▪ RAP Structure & Asphalt Laydown Annex		
Shift Details & Hours of Occupancy	**Shift Name**	**Hours**	**No. of People**
	Day	6am – 5.00pm (Mon to Sat)	Approx. 25-30
	Night	7.00pm – 3.00am (Sun to Fri)	Approx. up to 13 (dependent on client's production requirements)
Security Service Provider:	NCI Security 0418 446 613		
Fire and Emergency Equipment Contact:	Wormald 133166		

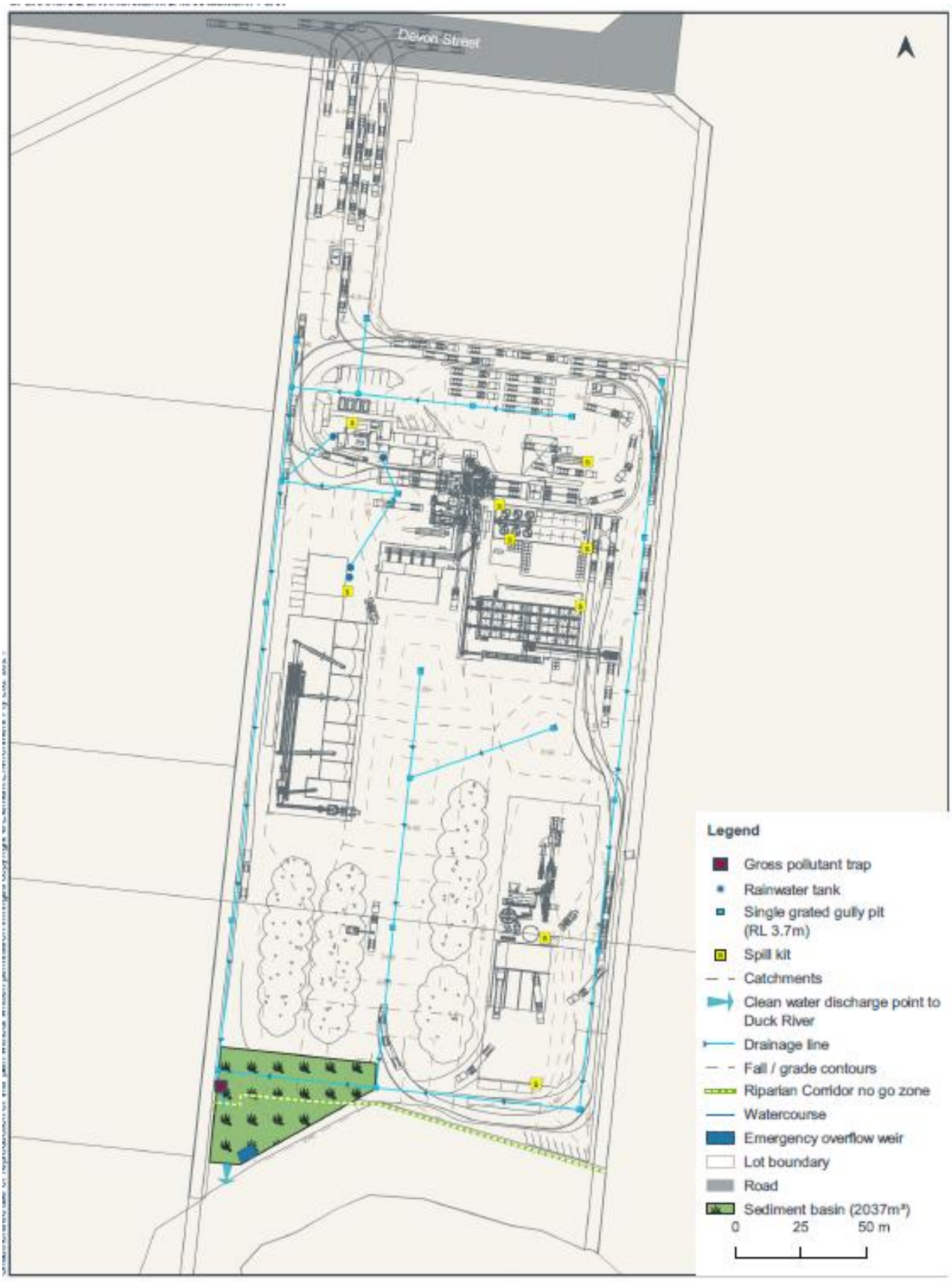
2.2 Site Location



2.3 Site Layout



2.4 Stormwater System Layout



2.5 Details of Neighbouring Facilities

Neighbouring Facilities	Contact Person & Phone number	Mechanism for Raising the Alarm and Ongoing Communication
Rosehill Gardens	Mostyn Copper 1300 729 668	Phone
Rosehill Distribution Centre	Peter Small (Charter Hall) 02 8651 9481	Phone
James Hardie	Grant Overton 13 11 03	Phone
VIVA Energy	Adam Speers 0400 214 857	Phone
Goodman	Brendon Quinn 02 9230 7400	Phone

3 COMMUNICATION OF THIS PLAN

This PIRMP shall be communicated to personnel through site induction, at Toolbox and Pre-Start meetings and will be displayed on site and made available on the Site Safety Management Board. Site specific evacuation procedures (incl. muster points and the identities of ERT personnel) will be displayed on noticeboards and in prominent positions throughout the site/buildings.

As required by the POEO Act, and to allow appropriate communication of the plan, a current copy of this plan is to be located on premises at all times and able to be provided to an authorised EPA officer on request.

In addition to having an onsite copy, a copy of this PIRMP will also be made publicly available on the ***Downer Group Website***.

4 LEGISLATIVE REQUIREMENTS

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the *POEO Act* and Clauses 131 of the *Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation)*.

In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan.
- The plan must include the information detailed in the POEO Act and be in the form required by the POEO(G) Regulation.
- Licensees must keep the plan at the premises to which the environment protection licence relates.
- Licensees must test the plan in accordance with the POEO(G) Regulation.
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan.

5 DEFINITION OF 'POLLUTION INCIDENT' AND NOTIFICATION REQUIREMENTS

The definition of a *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.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 148 of the POEO Act. In summary, these are broadly categorised as:

5.1.1.1 Duty of an employee or any person undertaking an activity:

Any person engaged as an employee or undertaking an activity with regard to the site will, immediately after becoming aware of any potential incident (even if outside of normal business hours), notify the Production Manager of the incident and all relevant information about it. The Production Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

5.1.1.2 Duty of an employer or occupier of the premises to notify:

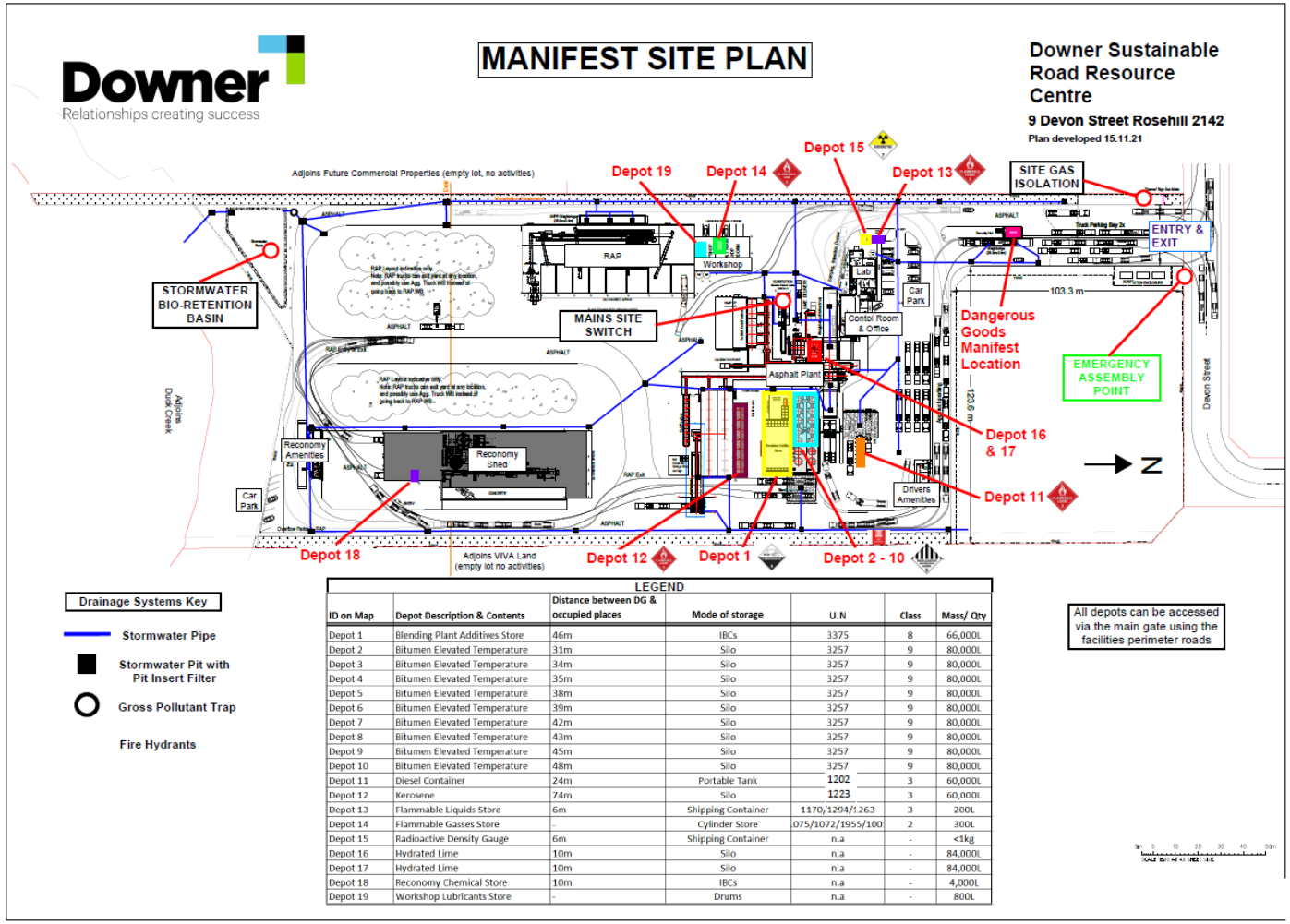
The employer or occupier of the premises (in this case, the Production Manager) on which the incident occurred, who is notified (or otherwise becomes aware of) of the incident, will immediately notify the relevant authorities about the incident and all relevant information.

Under the POEO Act, 'relevant authority' means any of the following:

- The appropriate regulatory authority – the Environment Protection Authority (EPA).
- If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs (i.e. council).
- NSW Public Health Unit.
- SafeWork NSW.
- Fire and Rescue NSW.

Section 15 of the PIRMP lists the contact details for these authorities.

6 INVENTORY OF POLLUTANTS



LEGEND

ID on Map	Depot Description & Contents	Distance between DG & occupied places	Mode of storage	U.N	Class	Mass/ Qty
Depot 1	Blending Plant Additives Store	46m	IBCs	3375	8	66,000L
Depot 2	Bitumen Elevated Temperature	31m	Silo	3257	9	80,000L
Depot 3	Bitumen Elevated Temperature	34m	Silo	3257	9	80,000L
Depot 4	Bitumen Elevated Temperature	35m	Silo	3257	9	80,000L
Depot 5	Bitumen Elevated Temperature	38m	Silo	3257	9	80,000L
Depot 6	Bitumen Elevated Temperature	39m	Silo	3257	9	80,000L
Depot 7	Bitumen Elevated Temperature	42m	Silo	3257	9	80,000L
Depot 8	Bitumen Elevated Temperature	43m	Silo	3257	9	80,000L
Depot 9	Bitumen Elevated Temperature	45m	Silo	3257	9	80,000L
Depot 10	Bitumen Elevated Temperature	48m	Silo	3257	9	80,000L
Depot 11	Diesel Container	24m	Portable Tank	1202	3	60,000L
Depot 12	Kerosene	74m	Silo	1223	3	60,000L
Depot 13	Flammable Liquids Store	6m	Shipping Container	1170/1294/1263	3	200L
Depot 14	Flammable Gasses Store	-	Cylinder Store	075/1072/1955/100	2	300L
Depot 15	Radioactive Density Gauge	6m	Shipping Container	n.a	-	<1kg
Depot 16	Hydrated Lime	10m	Silo	n.a	-	84,000L
Depot 17	Hydrated Lime	10m	Silo	n.a	-	84,000L
Depot 18	Reconomy Chemical Store	10m	IBCs	n.a	-	4,000L
Depot 19	Workshop Lubricants Store	-	Drums	n.a	-	800L

Additional information on the products, volumes and storage can be found in the Hazardous Material Screening Thresholds for Storage and Transportation Screening Thresholds located in **Annex A.**

7 LIKELIHOOD AND RISKS OF A POLLUTION INCIDENT

In accordance with the Site Risk Assessment outcomes, it has been identified that the key applicable risks to human health, property and the environment identified for the site are as follows. These have been risk rated in accordance with ***DG-ZH-PR006 Incident Management Procedure***:

Risk	Likelihood x Consequence Risk Rating
Dangerous and/or Hazardous materials spillage and discharge to environment (including contaminant discharge and tank failure)	C
Discharge of airborne emissions/contaminants off site	C

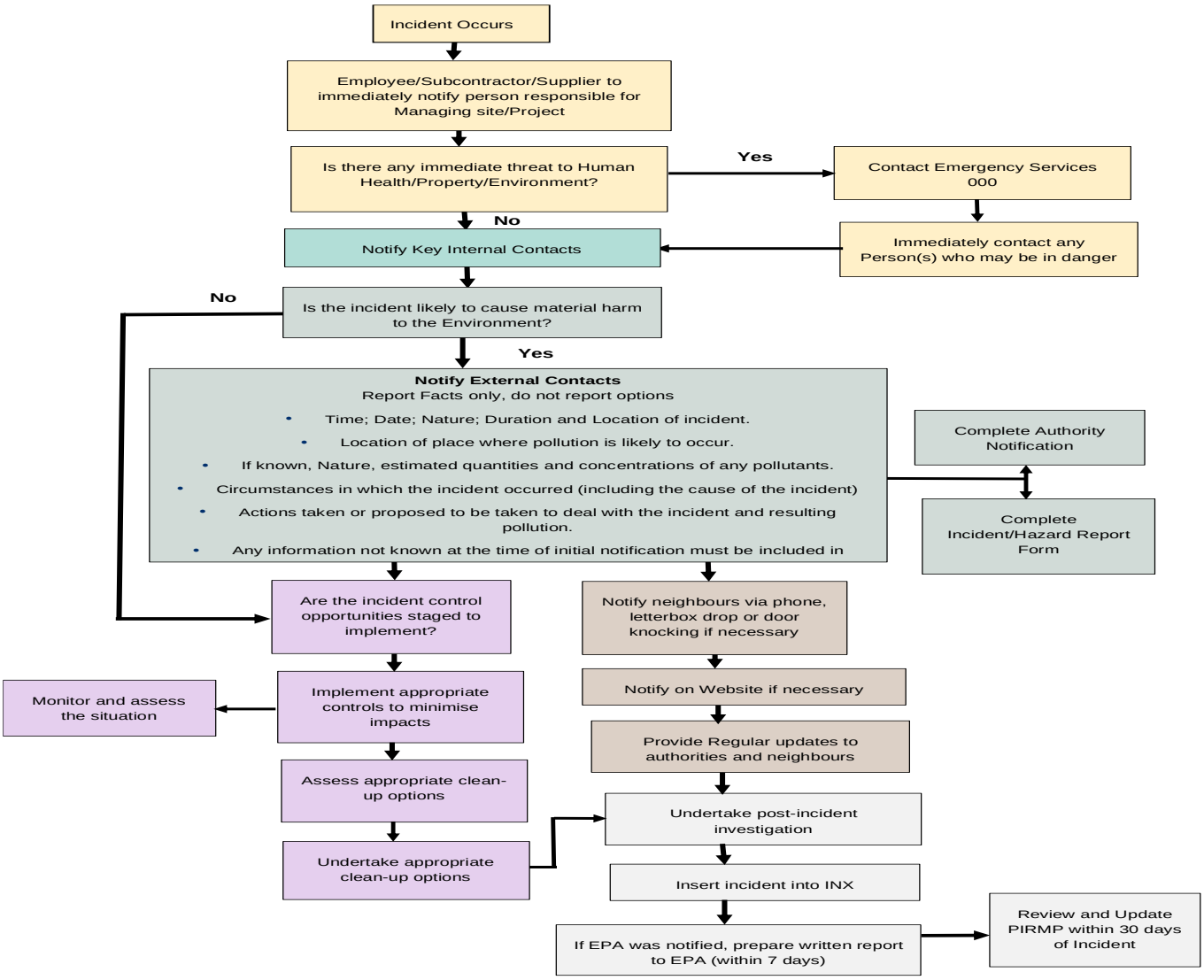
The likelihood of occurrence is to be reviewed regularly, following events, and in light of adverse weather conditions.

7.1 Pre-emptive Actions

Table 7.2 in the ***Operational Environmental Management Plan (OEMP)*** provides measures to avoid, mitigate and manage the potential environmental impacts identified through the environmental impact assessment of the site. These measures are considered pre-emptive actions and the minimal accepted standard of care and aim to ensure any identified risk of harm is reduced.

7.2 Incident Response Plans

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the management of these events is to be in accordance with ***DG-ZH-PR006 Incident Management Procedure***. The following flow chart should be used to identify the appropriate course of action.



In addition to this, specific pollination Incidents may be managed in accordance with the response action plans included in **Section 12** of this document.

8 ROLES AND RESPONSIBILITIES

Position	Responsibility
Employees and Contractors	• Following the procedures outlined in the PIRMP and related documents • Immediately alerting Site Manager or Team Leader of any environmental incidents or near-misses.
Team Leaders / Front Line Supervisors	• Following the procedures outlined in the PIRMP and ***DG-ZH-PR006 Incident Management Procedure***. • Immediately alerting Site Manager or, in case of their unavailability, Environmental Representative or Environment Manager of any potentially material environmental incidents or near-misses. • Assist in conducting incident investigations.

Site Manager
 	
and/or
 	
Environmental & Sustainability Advisor / Zero Harm Advisor
 	
and/or
 	
Environmental & Sustainability Manager / Zero Harm Manager
	• Authorisation, administration, maintenance and implementation of the PIRMP
	• Assessing whether the incident has caused or threatens "material environmental harm" and communicate details to management.
	• Make a determination as to whether the incident (as defined in section 147 of the POEO Act) is reportable to external agencies
	• Responsible for taking control of the site after the occurrence of a Pollution event and activating the implementation of this PIRMP until such time either:
	  ○ external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or
	  ○ the event subsides
	• Coordinate communication to neighbours
	• Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact.
	• Inform the Senior Leadership Management Team / Group Management and Notification to External Agencies
	• Undertake notifications as defined in PIRMP

Emergency Response Team (ERT)	The Emergency Response Team (ERT) is responsible for taking control of the site after the occurrence of a relevant safety and/or fire emergency event and activating the implementation of this PIRMP until such time either: • external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or • the event subsides

9 EMERGENCY TRAINING AND AWARENESS

All Personnel shall be provided with general Emergency Management Training as part of the site induction training process, and such training shall cover as a minimum:

- the locations of all emergency equipment and the correct method for its use.
- Risk awareness training to encourage awareness of the dangers presented by the site and the means for preventing it.

Personnel who have assigned responsibilities in an emergency situation (i.e. ERT, Fire Wardens, Evacuation Wardens, Site Management and ZH Team) shall be inducted into the PIRMP and provided with appropriate training.

Refer to the Facilities specific Training Needs Analysis/ Skills matrix for training schedule and completed training. This is to include emergency pollution response.

Requirements	Who Should Attend	Frequency	Training Provider
Site emergency systems: ▪ Alarms ▪ Communications ▪ Fire detection ▪ Fire suppression	▪ Wormald	As per systems frequency	Wormald
Site/ area evacuation drills	▪ All persons on site	Annually	Downer
Emergency Response Training	▪ ERT Personnel	Bi-Annually	Registered Training Organisation
Fire Warden	▪ All Fire wardens Personnel	Yearly	Registered Training Organisation

Incident and Emergency Preparedness includes all activities that focus on essential emergency response capabilities through the development of plans, procedures, the organisation and management of resources, and associated training and education.

10 EMERGENCY FACILITES & EQUIPMENT

10.1 Fire Fighting Equipment

The following requirements for fire equipment shall be taken into consideration:

- Location - extinguishers and hoses are to be placed in readily accessible locations and in areas where risk of fire is likely.

  In addition, Portable extinguishers and fire blankets are present on all Oxy-Acetylene Mobile Trolleys, and portable extinguishers are present on all Mobile Plant.
- Access - clear access is to be maintained around fire extinguishers and hoses at all times.
- Signage - signage is to be provided at each location, indicating the type of fire extinguisher and fire types that they are suited for.
- Mounting - Fire extinguishers are to be mounted on purpose made hooks or brackets and suspended above the floor.
- Inspection - Fire extinguishers are to be inspected and serviced every 6 months.

Fire Suppression Systems Details

- Nitrogen dosing located as part of AMMANN equipment at top drum
- Portables fire extinguishers on all levels of the Asphalt plant and surrounds (C02, Dry Chemical ABE & Foam AFF 90ltr)
- Portable powder fire extinguishers in electrical rooms
- Portable C02 fire extinguishers around diesel tank and bitumen tanks
- Portable fire extinguishers and Fire blankets in all buildings (offices and amenities)
- Hydrants around plant, main control at front gate as per diagram below

Hydrants and Hose Reel Details

- Mains are located at front gate on southern side
- 8 x Hydrants located around Asphalt plant
- Hose Reels located around plant and on plant – 20 in total
  (Refer to the site map for locations)

10.2 First Aid Facilities

First Aid provisions will be maintained and accessible to personnel, and all necessary training will be organised and communicated through Pre-Start / Toolbox Meetings, Inductions and information placed on Noticeboards.

First aid requirements are assessed upon reviewing applicable legislation and using the First Aid Needs Assessment Form at site setup and during review. First aid services and arrangements shall consider the types of hazards to persons at the workplace, potential activities to be performed, and the number of persons at the workplace and the risk level of identified hazards.

First Aid provisions will be maintained and accessible to personnel, and all necessary training will be organised and communicated through Pre-Start / Toolbox Meetings, Inductions and information placed on Noticeboards.

First Aid kit locations for this site are as per the site map.

10.3 Emergency Showers and Eyewash Stations

Safety showers and eye wash facilities shall be inspected, tested and cleaned.

- Safety showers and eye wash facilities shall be inspected, tested and cleaned in accordance with ***DG-ZH-PR116.1 Inspections Procedure***
- The Rosehill Sustainable Road Resource Centre has 2 safety showers. Located at tank farm and near the lime silo loading point behind the laboratory (Please refer to the site map on the following page for location)

10.4 Spill Response Equipment

Spill response equipment will be provided commensurate with nature, quantity and risk of substances in each area. The Spill Response Equipment Needs Assessment Form has been be used to determine the number, location and type of spill kits required.

The spill kit locations are as per the Site Map.

10.5 Emergency Signs & Lighting

Emergency signs as per Australian Standards for Workplace facilities

Emergency Lighting

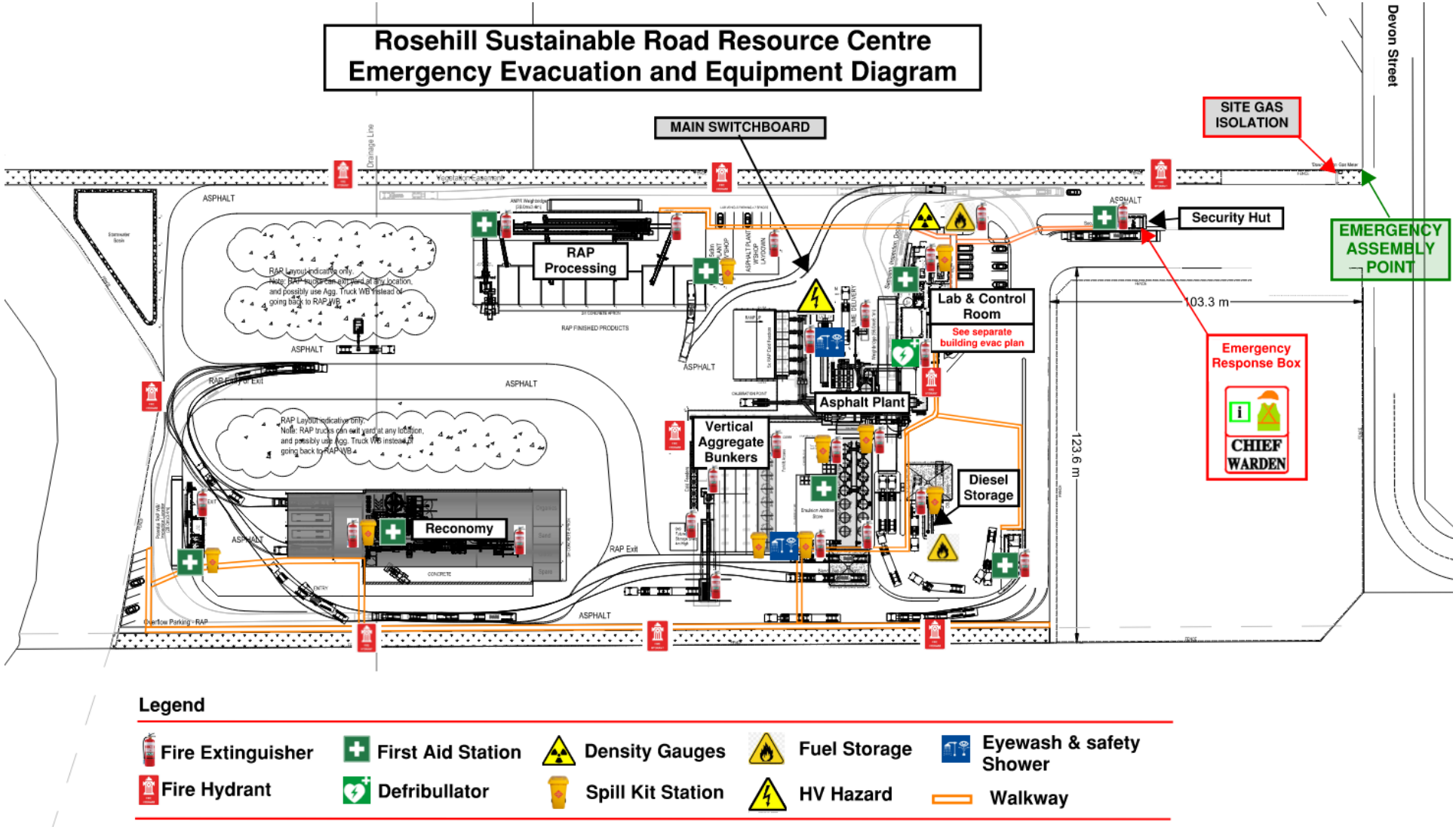
- Illuminated exit lights on all exits of enclosed building
- Flood lights on plant

Emergency Exits

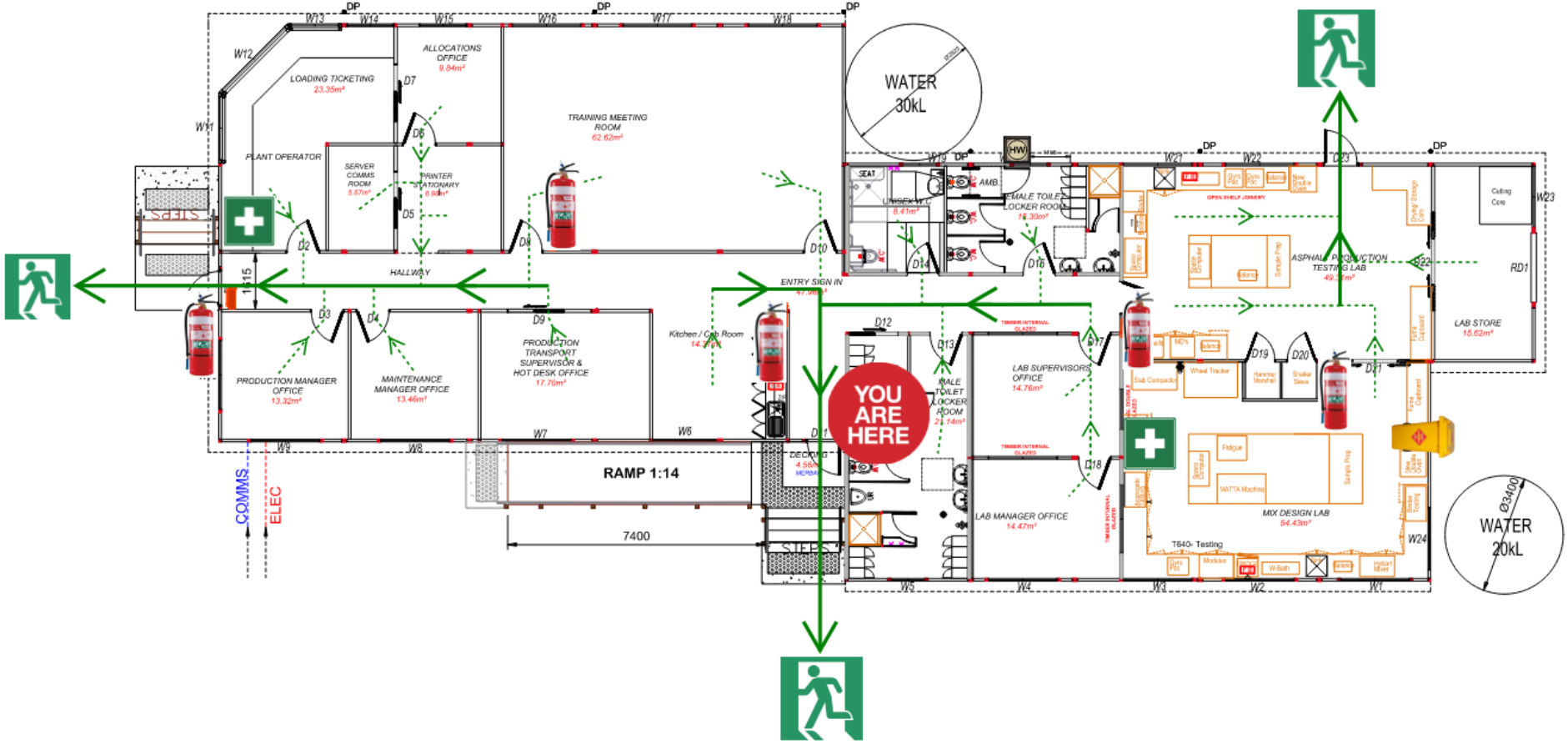
- Evacuation Signs located in all areas showing emergency exits

10.6 Electronic Discharge Valve

An electronically controlled submersible Actuator Valve with manual override and jammed valve protection is located between the bio retention basin and the site's discharge point. In the case of a major incident occurring onsite, this valve can be actuated from the Main Control Room preventing any fluids from leaving site.



Rosehill Office & Laboratory Emergency Evacuation and Equipment Diagram



Legend

Building Exit | Main Evacuation Route | Room Exits | Fire Extinguisher | First Aid Kits | Spill Kit Station

11 TESTING EMERGENCY RESPONSE PROCEDURES

Emergency evacuation and response drills will be conducted at regular intervals to verify the effectiveness of response arrangements and refresh emergency responders in requirements and their functions.

As a minimum:

- evacuation drills will be conducted Annually at each Building and department.
- response procedures for Pollution scenarios with a high likelihood of occurring, as identified in the Emergency Management Plan and PIRMP, will be tested Annually (minimum), and within one month of any pollution incident occurring.
- records of emergency evacuation and response drills will be maintained and stored within INX.
- evacuation and response drills will be assessed by the Supervisor to identify any deficiencies or improvements required and the assessment documented; and
- where deficiencies or improvements are identified, the Supervisor/Manager will generate an action plan and monitor progress to completion.

Testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner.

The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including the effectiveness of training.

Drills are conducted then evaluated and recorded using ***DA-ZH-FM015.5 Emergency Drill Observers Checklist***. Records shall be kept within INX and sent to the Site Manager / Zero Harm Team for performance review.

A summary of Emergency Drills undertaken is shown in the table below:

Test Date	Version of PIRMP Tested	Incident Type Drilled	Emergency Drill Lead
		TBA (Drill to be completed prior to 1-year EPL anniversary)	

12 EMERGENCY EVENT HAZARD RESPONSE

The following table provides a list of potential foreseeable emergency events and the response/ rescue method and equipment required for each. Refer to the operation's risk register for the risk rating/ level for each event.

Evacuation is always to be considered if fire or explosion potential exists.

Emergency Event	Response/ Rescue Method
Discharge of substance to drains	1. Identify the substance if possible 2. Wear appropriate PPE 3. Follow emergency procedure as per SDS sheets which are in the batch office 4. Contain the substance 5. If required, activate Discharge Valve at Bioretention basin to contain any liquids being discharged from site. 6. Where discharge has occurred, and liquids have been retained within the bio basin 7. Bund the area with equipment from the spill kit (check site map for location) 8. Block off or barricade area 9. Ensure appropriate fire extinguishers are nearby in case fire breaks out 10. Advise site manager 11. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred.
Discharge of substance to Duck River	1. If required, activate Discharge Valve at Bioretention basin to contain any liquids being discharged from site. Where discharge has occurred, and liquids have been retained within the bio basin. 2. Do not discharge the water to Duck River until sampling results indicate that no material harm to the receiving environment has been confirmed. Contamination of water includes anything that alters the physical, chemical or biological properties of the receiving waters. 3. Contact ***Environmental & Sustainability Advisor*** and notify that a Pollution Incident has occurred. 4. The ***Environmental & Sustainability Advisor*** will advise what samples are to be collected (from next to the discharge grate within the bio basin) and directions on how to prepare the samples bottles (on ice/ice bricks in an esky), fill out the Chain of Custody, Turnaround Times (24hr TAT) and organise the samples to be sent/delivered to Laboratory (Eurofins Girraween). 5. Where there is a possibility of Blackwater (Sewer) inclusion; The median bacterial content in samples of fresh or marine waters should not exceed: • 150 faecal coliform organisms/100 mL • 35 enterococci organisms/100 mL Pathogenic free-living protozoans should be absent from bodies of fresh water. (It is not necessary to analyse water for these pathogens unless the temperature is greater than 24°C.) Secondary contact; the median bacterial content in fresh and marine waters should not exceed: • 1000 faecal coliform organisms/100 mL; • • 230 enterococci organisms/100 mL.
Fire (inside facilities)	**1.** Assist any person in immediate danger or who is injured (Call ambulance if anybody is injured) **2.** If the fire is small attempt to put fire out with fire extinguisher (familiarize yourself with the location of fire extinguishers)

Emergency Event	Response/ Rescue Method
	3. If the fire is too large activate the fire alarm system by pushing the button on 2 of the signed manual call points throughout the plant. One at the control room and the other inside the main office entry, **4.** If the fire is in a building close all doors as everybody is evacuated to stop the fire from spreading **5.** Call the fire brigade. **6.** Alert neighbours and Downer ZH manager as required
Loss of Product / Tank Failure	1. Shutdown of processes and equipment associated with the spill if safe to do so 2. Wear appropriate PPE 3. Follow emergency procedure as per SDS sheets which are in the batch office 4. Activation of any associated sump pumps or shut-off valves to contain and isolate 5. If required, activate Discharge Valve at Bioretention basin to contain any liquids being discharged from site. 6. Contact Cleanaway of similar service provider to pump out bund contents 7. Ensure spill kit available for any release from containment 8. Advise site manager 9. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. 10. Repair / Replace Tank 11. Refill Tank
Toxic emission to atmosphere	1. Identify the substance if possible 2. Notify Management and Zero Harm 3. Follow emergency procedure as per SDS sheets which are located in the batch office 4. Contain the substance, if possible. 5. Alert neighbours, EPA and SafeWork NSW
Dust Emissions from Site	1. Determine the cause of the dust emissions and if possible, immediately address the cause (i.e. turn off plant/equipment). 2. Wear correct PPE for task 3. Implement most suitable management measure for task. Management measures for this may include: 4. Sweep roadways and hardstand 5. Turn on sprinkler/water systems to wet down source. Ensure there is no excess runoff into storm water system. 6. Cover stockpiles 7. Turn off asphalt plant and inspect baghouse or plant for potential cause of emission 8. Clean PPE and wash hands thoroughly following task. 9. Advise site manager 10. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. 11. Investigate Incident

A ‘minor environmental incident’ is where there has been no potential or actual material harm to the environment. Examples are excessive dust sighted by the site team or a small, contained hydrocarbon spill that does not leave a site boundary and are cleaned up without residual on-site environmental harm. Minor environmental incidents will still be handled under the process outlined in Section 10.3.3 except there will be no requirement for government notification. All minor or major incidents will be recorded in Downers INX system. A minor incident does not constitute a non-compliance with the consent. (Refer to Section 10.3.4 OEMP Rev 4).

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. For example, where an Incident has occurred and retained onsite, there is no duty to notify, until a release results in a receiving environment may be harmed.

When notifying relevant Authorities, EPA and other relevant authorities be provided with a written incident notification via the Major Projects website within 24 hours after the incident.

A written notification will:

- Identify the development and application number.
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).
- Identify how the incident was detected.
- Identify when the Applicant became aware of the incident.
- Identify any actual or potential non-compliance with conditions of consent.
- Describe what immediate steps were taken in relation to the incident.
- Identify further action(s) that will be taken in relation to the incident.
- Identify a site contact for further communication regarding the incident.

12.1 Community Notification and Communication

Communicating with neighbours and the local community is an important element in managing the response to any pollution incident. Downer will provide accurate communications information to relevant stakeholders and the community regarding operational activities and environmental matters, including:

- Prior to commencement of operations: a program of commencement and details of mitigation measures to minimise community impacts.
- During and/or following Significant Environmental incidents where applicable, including any associated community impacts and mitigation measures.

13 EMERGENCY CONTACTS

Downer Australia Internal Emergency Contacts			
24-Hour Emergency Number 1300 366 538			
Administration (contact number and hours): 02 9897 4333 between 7am and 5pm			
Downer Rosehill contacts	**Contact No.**	**After Hours No.**	**Details**
Sydney / Newcastle Surfacing Manager - Darren Prosser	0419 302 046	0419 302 046	
Production Manager – Paul Sherry	0419 789 505	0419 789 505	Additional 24-hour contact
Recycling / Maintenance Manager – Roy Stiff	0407 228 098	0407 228 098	
Matthew Wade – Reconomy Manager	0419 244 748		
Chief Fire Warden – Stephanie Loukis (day) Harry Papaeleou (night)	0418 473 976	0476790413	All Incidences and Emergencies
Emergency Response Team (ERT)	02 98974351		All Incidences and Emergencies
First Aid Officer – Matthew Wade	0419 244 748	02 98974351	First Aid
Downer Australia External Emergency Contacts			
Ambulance, Fire, Police	**000** **Mobile: 112**		**Life Threatening Emergencies**
Fire Brigade - Silverwater 122 Adderley Street Silverwater	02 9647 1246	02 9647 1246	Fire and Chemical spills
Police - Granville 2 Carlton Street Granville	02 9897 4199	02 9897 4199	Security matters
Medical			
Public Hospital - Westmead Hawkesbury Rd & Darcy Road, Westmead	02 9845 5555	02 9845 5555	Serious Injury
Medical Centre – Merrylands Family Practice 189 Merrylands Road Merrylands	1300 637 000	1300 637 000	Injury
Poisons Information Centre	13 11 26	13 11 26	Poisons Information

Other Authorities as required by legislation **Reportable following instruction with Regional Zero Harm Manager / Environmental Manager / Site Manager or delegate**			
State Emergency Services	13 25 00	13 25 00	Notifiable incidents immediately
Local Council - Parramatta	1300 617 058	1300 617 058	Notifiable incidents immediately
Department of Public Health	02 9845 5555	02 9845 5555	Notifiable incidents immediately
Workplace Safety Regulatory Body (eg WorkSafe)	13 10 50	13 10 50	Notifiable incidents immediately
Environment Protection Authority	131 555	131 555	Notifiable incidents immediately
Supply Authorities:			**Supply Issues**
Electricity - Endeavour	131 003	131 003	Electricity
Gas - Jemena	131 009	131 009	Gas
Water – Sydney Water	13 20 92	13 20 92	Water

13.1 EMERGENCY EVENT PUBLIC INFORMATION SOURCES

Organisation	Medium	Contact
NSW Ministry for Police and Emergency Services	Website	www.nsw.gov.au
NSW State Emergency Service (SES)	Website	www.ses.nsw.gov.au
NSW Rural Fire Service	Website	www.rfs.nsw.gov.au
NSW Police Force	Website	www.police.nsw.gov.au
NSW Ambulance	Website	www.ambulance.nsw.gov.au
Bureau of Meteorology	Website	www.bom.gov.au

ANNEX A HAZARDOUS MATERIAL SCREENING THRESHOLDS FOR STORAGE

APPENDIX B. HAZARDOUS MATERIAL SCREENING THRESHOLDS FOR STORAGE

Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference
Gases	2	2.1	-	Acetylene	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	0.008	0.035	Class 2.1 Flammable gases - Pressurised (excluding LPG): Table 1, screening threshold is 100kg (0.1 tonnes).	Total Class 2.1 - Pressurised (excluding LPG) does not exceed SEPP 33 threshold.	No	No	Typical properties - information provided by client.
				Belt Grip	DG Store (SE corner of asphalt plant workshop)	Packages	0.005						
				Galmet Cold Galv	DG Store (SE corner of asphalt plant workshop)	Containers	0.012						
				WD40	DG Store (SE corner of asphalt plant workshop)	Packages	0.01						
		2.1	-	LPG gas	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	0.018	0.018	Class 2.1 - LPG Aboveground: Table 1, screening threshold is 10 tonnes.	Total Class 2.1 - LPG Aboveground does not exceed SEPP 33 threshold.	No	No	
		2.2 SR 5.1	-	Oxygen	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	< 0.1	5	No threshold for Class 2.2 (non-hazardous) based on SEPP 33 Class 5.1 has a screening threshold, so use sub risk.	Does not exceed SEPP 33 threshold.	No	No	
Flammable liquid	3	-	II	Unleaded Petrol	DG Store (SE corner of asphalt plant workshop)	Containers	0.016	1.6	Class 3PGII: Table 1, minimum quantity for further evaluation is 5 tonnes More than 50 m from kerosene Class 3 PGIII, not cumulated – treat as separate storages.	Total Class 3PGII does not exceed SEPP 33 minimum threshold and does not required assessment.	No	No	Typical properties - information provided by client.
				Toluene	Chemical storage (Lab store)	IBC	0.8						
				Ethanol	Chemical storage (Lab store)	IBC	0.8						
	3	-	III	Kerosene	Blending Plant Additive Store (see 'Emulsion Additive Store)	Fuel Tank (self bunded)	48	48	Class 3PGIII: Table 1, quantity greater than 5 tonnes, requires use of Figure 9 to evaluate. 65kL kerosene tank	Total Class 3PGIII exceeds SEPP 33 threshold for evaluation however is separated by more than 8 m from boundary as per Figure 9 so not potentially hazardous.	No	No	
Corrosive	8	-	II	Cationic Emulsifier - polyamine	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	15	62	Class 8 PGII: Table 3, screening threshold is 25 tonnes. Note: Class 8 PGIII is stored in the same area as PGII and therefore falls under that threshold.	Total Class 8 does exceed SEPP 33 threshold.	Yes	Yes	Chemwatch : 23-0489 Issue date: 23/09/2017
				Cationic Emulsifier - tallow triethylenedia	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	34						Chemwatch : 84-3402 Issue date: 01/11/2019

Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference
				mines ethoxylated									
				Hydrochloric Acid	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	8						Chemwatch : 6095-44 Issue date: 01/11/2019
			III	Ceca Base	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	5						Chemwatch : 23-0487 Issue date: 01/11/2019
Miscellaneous dangerous substances and articles, including environmentally hazardous substances	9	Combustible		Diesel	Immediately north of asphalt truck spray gantry	Fuel Tank	45	985	No threshold for Class 9 based on SEPP 33. Note for diesel and bitumen: Page 16 'If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored they are not considered to be potentially hazardous. If, however, they are stored with other flammable liquids, that is, class 3PGI, II or III, then they are to be treated as class 3PGIII, because under these circumstances they may contribute fuel to a fire'.	Diesel in separate self-bunded tank 60kL, immediately north of asphalt truck spray gantry. Diesel therefore not cumulated with kerosene inventory. Bitumen in bulk tanks in separate bund, not cumulated with kerosene inventory.	No	No	Typical properties - information provided by client
				Bitumen	Bitumen Tanks (6 x western tanks labelled PMB and C450 in the bitumen tank farm).	Tank	780		Not within same area/bund as Class 3. No threshold.	In process circuit only. Not cumulated with kerosene inventory.	No	No	Typical properties - information provided by client
				Bitumen Class 170 or 320	Blending Plant Tank Farm.	Bulk tank	160						
		-		Delvac 1330	DG Store (SE corner of asphalt plant workshop).	Containers		< 5	No threshold for Class 9 based on SEPP 33 - excluded from Screening.	Screening not required. Class 9 — are miscellaneous dangerous goods, which pose little threat to people or property. They may be substances which pose an environmental hazard.	No	No	Typical properties - information provided by client
				Mobilith SHC 220	DG Store (SE corner of asphalt plant workshop).	Containers							

Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference
Not classified as DG	n/a	-					No thresholds.						
				Caesium 137 (Nuclear gauge) * 5	Stored in cabinet complying with relevant standards next to Lab store.	Yellow case inside storage cage							
				Cationic Emulsifier - tall-oil maleated amidoamines	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Calcium Chloride	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Non Ionic Asphalt Emulsifier	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Cationic Styrene Butadiene Rubber Latex	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Polyfloculant	Reconomy Chemical Storage.	IBC							
				AntiFoam	Reconomy Chemical Storage.	IBC							
				Coagulant	Reconomy Chemical Storage.	IBC							
				Lubricants	Reconomy Chemical Storage.	packaged <5L							
				Hydrated Lime	Lime Silos (round circle with two squares on to east of lime delivery).	Bulk silos							

APPENDIX C. TRANSPORTATION SCREENING THRESHOLDS

Trip Type (Receipt of Goods by Truck)	Average Traffic Generation (indicative)		Average Annual Delivery (tonne)	DG Class	Load per quantity	SEPP 33 Threshold Vehicle Movements (Table 2)		Minimum Quantity [Note 1] per Load (tonne)		Threshold Exceeded?
	Annually	Peak Weekly				Annually	Peak Weekly	Bulk	Package	
Acetylene	2	-	0.008	Class 2.1	1 x 7.0m3	>500	>30	2	5	No
Belt Grip	1	-	0.005		12 x 750g cans					
Galmet Cold Galv	1	-	0.012		12 x 750g cans					
WD40	2	-	0.010		12 x 750g cans					
LPG gas	8	-	0.018		2 X 9kg					
Unleaded Petrol	-	1	0.016	Class 3 PG II	20L	>750	>45	3	10	No
Toluene	26	-	0.8		1000L					
Ethanol	26	-	0.8		1000L					
Kerosene	26	1	48	Class 3 PG III	35000L	>1000	>60	10	No limit	No
Cationic Emulsifier - polyamine	2	-	15	Class 8 PG II/III	8 tonnes	>500	>30	2	5	No
Cationic Emulsifier - tallow triethylenediamines ethoxylated	3	-	34		15 tonnes					
Hydrochloric Acid	24	-	8		3 tonnes					
Ceca Base	4	-	5		5 X 1000L IBC					
Bitumen	-	15	480	Class 9	23 tonnes	>1000	>60	No limit	SEPP 33 does not have value	-
Delvac 1330	1	-	0.08		2 X 40L drum					
Mobilith SHC 220	1	-	0.06		2 X 40L drum					
Bitumen Class 170 or 320	-	7	160		25 tonnes					
Diesel	12	-	48		3.5 tonnes					

Notes:
1) load sizes below this quantity do not require assessment. As per the guideline, if quantities are below this level, the potential risk is unlikely to be significant.

ANNEX B ENVIRONMENTAL IMPACT AND CONSEQUENCE CLASSIFICATION TABLE

In line with ***DG-ZH-PR006 Incident Management Procedure***, Environmental Incidents shall be classified initially in accordance with the "Risk Consequence" descriptors for "Environmental and Community Impact" (see Column "B"). The examples/ impacts descriptors included in columns "C" to "I" are provided to assist in determining the appropriate environmental incident classification/ category.

Incident Classification	**Risk Consequence**	**Impact Descriptors**						
Downer Severity Rating Level (A)	**Environmental and Community Impact[i] (B)**	**Regulatory Licence/ Approvals (C)**	**Spills/ Chemical and Hydrocarbon Storage (D)**	**Water (E)**	**Waste Disposal (F)**	**Flora/ Fauna/ Biosecurity (G)**	**Air, Odour, Dust, Fume Noise and Vibration (G)**	**Heritage[ii]/ Archaeological (I)**
6	Catastrophic widespread impact on the environment resulting in irreversible damage; and/ or Complete loss of trust by affected community leading to long term social unrest and outrage.	Prolonged loss of multiple Regulatory licence/approval for business-critical infrastructure.	Spills causing "material harm"[iii] and widespread environmental impact that cannot be contained within a waterway (e.g. dam, creek, groundwater source, wetland, or drainage system) or other environmentally sensitive areas. Requires 3rd party intervention and prolonged monitoring, remediation and on-going management attention.	Unauthorised works to sensitive waterway or groundwater source causing widespread irreversible damage. Prolonged non-compliant contamination[iv] of waterway, groundwater or catchment area (>5 days), causing widespread environmental impact.	Incorrect disposal (dumping) of regulated waste over a sustained period. Requires 3rd party intervention and on-going management attention.	Death of numerous endangered species. Unauthorised widespread clearing or damage to endangered vegetation (communities).	Generation of air, odour, dust, noise or vibration resulting in widespread damage, e.g.: • vibration that causes extensive structural damage • uncontrolled release of hazardous emissions (e.g. asbestos dust, or toxic gas). Prolonged and recurring post blast fume events incurring ongoing complaints and action associated with prosecution and potential termination of contract.	Irreparable damage to highly valued sites, structures, or objects of heritage/ archaeological significance.

Incident Classification	Risk Consequence	Impact Descriptors						
Downer Severity Rating Level (A)	**Environmental and Community Impact[i] (B)**	**Regulatory Licence/ Approvals (C)**	**Spills/ Chemical and Hydrocarbon Storage (D)**	**Water (E)**	**Waste Disposal (F)**	**Flora/ Fauna/ Biosecurity (G)**	**Air, Odour, Dust, Fume Noise and Vibration (G)**	**Heritage[ii]/ Archaeological (I)**
5	Significant impact on the environment; and/or Prolonged community outrage.	Prolonged loss of Regulatory licence/approval for business-critical infrastructure.	Spills that cause "material harm"[3] and the extent of impact cannot be restricted within a waterway (e.g. dam, creek, groundwater source, wetland, or drainage system) or other environmentally sensitive areas. Requires 3rd party intervention and on-going management attention.	Unauthorised works to sensitive waterway or groundwater source resulting in "material harm"[3]. Sustained and non-compliant discharge that delivers large volumes in a short period; or occurs over several days. Persistent discharge of pollutant/ contaminated water or sediment >3 days.	Incorrect disposal (dumping) of regulated waste. Any illegal or unpermitted waste dumping outside the mining lease. Requires 3rd party intervention and on-going management attention.	Death of one endangered species or significant number of species of conservation significance. Unauthorised clearing of endangered vegetation (communities). Introduction of a declared weed, pest or plant disease that threatens ecosystems and requires longer term control to eradicate >5 years with continual management.	Generation of air, odour, dust, noise or vibration emissions causing prolonged periods (>5 days) of inconvenience or disruption to the environment. Consecutive breaches of licences, permits or approval conditions. Recurring post blast fume events that breach exclusion zone, incurs prosecution and potential suspension of contract.	Disturbance causing significant damage to a highly valued site(s), structures, or objects of heritage/ archaeological significance.
4	Significant impact or material harm[3] on the environment; or A notifiable incident[v]; or Long term community irritation leading to disruptive actions and requiring continual management	Short term loss of Regulatory licence/approval for business-critical infrastructure.	Spills that cause "material harm"[3] and enter sensitive land or sensitive waterways (e.g. dam, creek, groundwater, wetland, or drainage system). Spill can be contained, cleaned-up and	Unauthorised works to waterway, groundwater source or associated engineered structure resulting in "material harm"[3]. Dam or sediment control failure leading to	Incorrect disposal (dumping) of non-regulated waste. Requires 3rd party intervention and on-going management attention. Any illegal or unpermitted waste dumping inside the mining lease, including the	Isolated death of multiple individuals from a species (flora and fauna) of conservation significance. Unauthorised clearing of land or vegetation areas of conservation significance. Introduction of	Any activity (blast, construction or maintenance) that is in breach of air, odour, dust, noise or vibration emissions that damages property or infrastructure. Consecutive non-compliance (internal) or breach of licence,	Disturbance causing significant harm to a known heritage or archaeological site of moderate to high significance or land subject to native title or has Maori land status. Situation that is considered of concern by

Incident Classification	Risk Consequence	Impact Descriptors						
Downer Severity Rating Level (A)	Environmental and Community Impact[i] (B)	Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage[ii]/ Archaeological (I)
	attention.		remediated.	discharge of sediment laden water to a waterway (e.g. dam, creek, groundwater, drainage system) or other environmentally sensitive areas. Sustained and non-compliant discharge that delivers large volumes in a short period or occurs over several days.	disposal of waste in dumps or backfill.	declared weed, pest or plant disease that can be eradicated within 1-5 years, with continual management.	permit or approval conditions requiring intervention from customer or regulator. Post blast fume event that breaches exclusion zone or regulator issues fine.	customer or traditional owners or requires intervention from the regulator.
3	Moderate impact or material harm[3] on the environment; or A notifiable incident[6]; or Short term community unrest and dissention.	Licence/ Approval breach notifiable to regulator. Works commence without an environmental licence/ approval. Works suspended due to non-conformances of Licence/ Approval	Spills that cause "material harm"[3] to non-sensitive land or non-sensitive waterways.	Unauthorised works to a waterway, groundwater source or associated engineered structure. Brief/ limited volume of water discharge that was monitored and found to be non-compliant, or unmonitored and presumed to be non-compliant (exceeds permit or water quality limits) resulting in	Regulated or non-regulated waste being taken to a waste facility not licensed to accept that type of waste (e.g. dangerous goods or hazardous materials disposed of at general landfill). Regulated waste being transported by unlicensed company or individual.	Deaths of multiple individuals of a common species. Isolated death of a single individual of one species (flora or fauna) of conservation significance. Unauthorised clearing of land or vegetation of low conservation significance. Introduction of a declared weed, pest or plant disease that can be eradicated within 12 months.	Any complaints where air, odour, dust, noise and vibration emissions cause sustained periods (repetitive or >1 day) of inconvenience and are found to be non-compliant. Any activity (blast, construction or maintenance) that is in breach of air, odour, dust, noise and vibration emissions limits. Failure to notify local community	Disturbance causing moderate harm to a known heritage or archaeological site of moderate significance or land subject to native title or has Maori land status that may require notification to the regulator.

Incident Classification	Risk Consequence	Impact Descriptors						
Downer Severity Rating Level (A)	Environmental and Community Impact[i] (B)	Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage[ii]/ Archaeological (I)
				notification to the regulator.			of activities as required by licence, permit or approval. Post blast fume event that does not breach exclusion zone but has multiple community complaints.	
2	Minor impact on the environment; or Community complaint founded requiring intervention and management attention.	Administrative Breach to licence or approval notifiable to the regulator. E.g. didn't submit an annual return on time. Works commence without an environmental licence or approval where one is required.	Any spill outside the secondary containment or operational area or a spill that can be cleaned up and managed appropriately. Any spill that does not cause "material harm"[3].	Any unplanned water discharge that resulted in a minor exceedance that does not trigger notification to the regulator. Water delineation structures (e.g. bunds or other secondary containment) failed to prevent contamination of waterway (e.g. dam, creek, groundwater, wetland, or drainage system) or other environmentally sensitive areas.	Non-regulated waste being taken to a facility not licensed to accept that type of waste. Littering from business related activities blown or disposed of away from work site or associated with transport and storage of waste.	Deaths of multiple individuals from a common species. Unnecessary or unauthorised disturbance of vegetation or land. Introduction of a non-declared weed, pest or plant disease that can be eradicated within 3 months.	Generation of air, odour, dust, noise and vibration emissions causing temporary period (<1 day) of inconvenience. Post blast fume event which does not breach blast exclusion zone and incurs single, one-off, community complaint. Import/ export or use of a regulated substance (e.g. ozone depleting) without authorisation or outside licence/ approval conditions.	Disturbance causing minor harm to a known heritage or archaeological site of low significance that does not trigger notification to the regulator.

Incident Classification	Risk Consequence	Impact Descriptors						
Downer Severity Rating Level (A)	Environmental and Community Impact[i] (B)	Regulatory Licence/ Approvals (C)	Spills/ Chemical and Hydrocarbon Storage (D)	Water (E)	Waste Disposal (F)	Flora/ Fauna/ Biosecurity (G)	Air, Odour, Dust, Fume Noise and Vibration (G)	Heritage[ii]/ Archaeological (I)
1	Negligible impact on the environment; or No or unfounded community complaint.	Administrative Breach to licence that can be rectified immediately. Non-conformance to a licence outside of Downer control – e.g. rainfall exceeds stormwater treatment design criteria	Minor spills contained within immediate area. Spills contained within the secondary containment (e.g. bund) or operational area (e.g. mine site).	A water discharge with negligible harm to the waterway.	Waste going into the incorrect receptacle. Recycling material being disposed of incorrectly when recycling facilities are available.	One off or isolated interaction or death of a single common species (e.g. grey kangaroo or established tree or shrub struck by vehicle).	One-off or isolated air, odour, dust, noise and vibration emission. Post blast fume event does not breach exclusion zone, no associated community complaint.	Unknown heritage or archaeological object found unexpectedly, and disturbance occurred, causing negligible harm.

[i] One or more of the criteria in the Impact Descriptors columns triggers the classification/ level to be declared for an incident. The incident classification will be taken as the highest number of all the impact descriptors.

[ii] "Heritage" includes European and non-European, known or unknown items of significance such as buildings, landscapes, monuments, moveable objects and non-European heritage such as items of significance to local community (e.g. burial sites, shell middens, scar trees, or engravings).

[iii] Material Harm – for classifying environmental incidents for Downer, harm to the environment is "material" if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000; and
- 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, including the costs of consultants and associated reports. Consideration is to be given to environmental harm caused beyond the immediate vicinity of where the pollution incident occurred.

[iv] Contamination of water includes anything that alters the physical, chemical or biological properties of the receiving waters.

[v] Notifiable incident – any incident classified at ≥ level 3, where there is a duty to notify the relevant authority(s) of a pollution incident, where "material harm" to the environment is caused or threatened. The definition of "material harm" differs slightly between the regulatory jurisdictions so it is important to check the relevant legislation.