POLLUTION INCIDENT RESPONSE MANGEMENT PLAN

Albury Brick Plant
Hueske Road, Jindera NSW 2642

Prepared for:
PGH Bricks Pty Ltd

October 2024

PGH Bricks Pty Ltd

Pollution Incident Response Management Plan

Document Control: Revision History, Tests and Training

The Document Control table below will reflect all PIRMP Revision Details for at least **four** consecutive years.

Version	Date	Revision Details	Revised by	Approved by
Version 6	10/06/16	Annual Review with no amendments required.	Cameron Robinson (PGH Plant Manager)	Debbie Cook (PGH) National WHSE Manager
Version 7	24/10/16	Supersedes previous Boral Version 6 with new format and additional details to reflect: • Boral & CSR merger • PIRMP Test completed on 18/10/16 • PIRMP Training conducted 18/10/16 • Annual Review of PIRMP 18/10/16 • Review of likely material harm sources/locations (Incident responses reduced from 11 to 6)	Attila Balazs (ECS Director) Cameron Robinson (PGH Plant Manager)	Debbie Cook (PGH) National WHSE Manager
Version 8	23/8/2017	Updated with latest training	Cameron Robinson (PGH Plant Manager)	Debbie Cook (PGH) National WHSE Manager
Version 9	17/10/18	Updated with latest drill	Cameron Robinson (PGH Plant Manager)	Debbie Cook (PGH) National WHSE Manager
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Version 12	25/10/2021	Updated last drill	Cameron Robinson (PGH Plant Manager)	
Version 13	20/7/2022	Updated last drill	Cameron Robinson (PGH Plant Manager)	
Version 14	20/10/2023	Updated last drill Change in plant manager – Updated name	John Haynes (PGH Plant Manager)	
Version 15	22/10/2024	Updated last drill Removed Jeff Doney added Luke Blanchard	John Haynes (PGH Plant Manager)	
Version 16	28/05/2025	Updated last drill	John Haynes (Manufacturing Manager)	

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This Pollution Incident Response Management Plan (PIRMP) has been prepared for the Boral-CSR Albury Brick Plant operating within the conditions of an Environment Protection Licence (EPL No.1515) issued under the *Protection of the Environment Operations Act 1997* (POEO Act).

All holders of an EPL are required to prepare and implement a PIRMP which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with the Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication about a pollution incident to:
  - employees, contactors and visitors;
  - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
  - neighbours and communities who may be impacted by the pollution incident; and
- Testing and review of the PIRMP for its accuracy, currency and effectiveness in responding and communication of a pollution incident.

The following flowchart provides a summary on the activation procedure of the Albury Brick Plant PIRMP.

PIRMP Activation Procedure

All Employees and Contractors

Any **Pollution Incident** such as spill / leak / fire / excessive dust
Must be **Immediately Reported** to the Plant Manager with details of severity and response
(See Sect 1.1 for Definitions of Pollution Incident and Immediate Reporting)

⇓

Plant Manger

Does the incident have potential for **Material Harm**?
(See Sect 1.1 for Definition of Material Harm)

⇒

Plant Manger

No requirement for **"Immediate Reporting"**. However, decision should be subject to updates on incident response status

⇓

Plant Manger & PIRMP Response Team

- Ensure appropriate response is being conducted to safely minimise impacts **(See Sect 4.1 & 4.2)**
- Ensure all employees / contractors / visitors are safe and restricted from incident area **(See Sect 3.1)**
- Notify Authorities of the incident nature, substances involved, risks and response **(See Sect 5.1)**
- Notify neighbours/community of incident and any precautions they may need to take **(See Sect 5.2)**
- Coordinate with Authorities or external incident response - if in attendance **(See Sect 4.1 & 4.2)**
- Provide appropriate updates to Authorities and neighbours/community **(See Sect 4.2 - Table 4)**

Once Incident response has been completed

⇓

Plant Manger & PIRMP Response Team

- Notify Authorities and neighbours/community incident response has been completed
- Inform Authorities and neighbours/community of any ongoing precautions required
- Clean-up response materials and dispose through licensed waste service provider
- Engage environmental consultants to investigate and remediate contamination (if required)
- Consider Duty to Report obligations on any residual contamination to EPA under S60 of CLM Act
- Conduct incident investigation and revise PIRMP with any learnings - **within 30-days of incident**
- If any amendments required to PIRMP then post revised version on website
- Provide incident investigation summary to Authorities, neighbours and community

(See Sect 4.2 - Table 4)

1 INTRODUCTION

This Pollution Incident Response Management Plan (**PIRMP**) has been prepared for the PGH Albury Brick Manufacturing Plant (**the Site**) which operates under the regulatory requirement of an Environment Protection Licence (**EPL No. 1515**) administered by the NSW Environment Protection Authority (**EPA**).

All holders of an EPL are required to prepare and implement a PIRMP which provides details on the manner in which the Site will comply with the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* (**POEO Act**) and relevant clauses of the *POEO General Regulation* (**POEO Gen Reg**), which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication of a pollution incident to:
  - employees, contactors and visitors;
  - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
  - neighbours and communities who may be impacted by the pollution incident; and
- Testing and review of the PIRMP for accuracy, currency and effectiveness in responding and communication of a pollution incident.

1.1 KEY PIRMP DEFINITIONS

The following definitions provide an understanding of three key terms that the EPA generally reference in relation to when a PIRMP is expected to be activated:

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.

Material Harm to the environment is when:

- 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 (or such other amount as is prescribed by the regulations), 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.

Immediately Reporting simply means promptly and without delay. The amount of time that this actually takes is likely to change depending on the circumstances of the incident.

1.2 Site Description and Operations

The Site operations require relatively small quantities of chemicals and materials that could be considered to have potential for causing material harm. Furthermore, the Site is predominantly surrounded by rural grazing land with very few residential premises in close proximity and in the unlikely event of a significant pollution incident, minimal impact upon neighbours or the local community would be expected (Refer to Figure 1).

Raw materials for the brick manufacturing are obtained through on-site extraction campaigns undertaken periodically each a year with the use of heavy earth moving equipment from various areas within the quarry pit. Raw materials are also imported from PGH's Oaklands and Andersons quarries. The raw materials are stockpiled under covered and open areas.

Front end loaders mix the raw materials until a homogenous consistency is achieved prior to being loaded into feeder bins and dropped onto a conveyor for primary crushing. In the crushing plant, the material is passed through a finer crusher where it is further reduced to around 30 - 40mm diameter. The material is then moistened and passed through rollers and mixers finally reducing the diameter to 1 - 2mm diameter clay particles.

The clay is further moistened during the pugmill process where it shredded and de-aired in preparation for the extrusion process. Colour to the various products may be added during the pugmill process. The clay is then forced under pressure into the extruder, through a die and shaper cap which compacts the clay and shapes it into a continuous column. The column is then cut into slugs by a guillotine producing the desired dimension and number of bricks and pavers.

The brick or pavers products are then set onto kiln cars for the kiln firing process. The kiln car enters the pre-heater where the products are heated in preparation for the firing process in the kiln. The kiln car is pushed through firing zones further heating the products to the designated temperature. The products then progress through cooling zones prior to being unloaded, dehacked and packed for distribution.

Figure 1: Approximate Site Operational Boundary and Surrounding Locality

Image Sourced from Google Earth (Oct 2016)

2 INVENTORY AND RISK ASSESSMENT

The Site operations involve the storage and management of chemicals, materials and equipment, some of which have potential to adversely impact upon the environment and human health. Table 1 provides an inventory of substances required as part of Site operations and a risk assessment on the likelihood and consequence of an associated pollution incident. The respective risk rankings are based on the most severe incident associated with each of the substances using the risk matrix presented in Table 2.

Table 1: Inventory of Substances with Potential for Material Harm

Substance / Incidents	Max Quantity	Risk Assessment		Risk Ranking (See Table 2)
		Consequence	Likelihood	
Diesel (Catastrophic failure resulting in total volume loss) – See also Incident Response No. 1 (Table 4)	6,500L	3	1	**Medium**
Mobile Plant and Parked Vehicles (Catastrophic failure of fuel tanks with total volume loss) – See also Incidents No. 5 (Table 6)	1,000L	2	1	**Low**
Oils/Solvents/Lubricants/Oxides (Spill/Leaks contaminating stormwater drainage lines and/or surface waters) – See also Incident No. 3 (Table 4)	1,500 L	1	2	**Low**
Clay (Potential dust incidents impacting neighbour's amenity) – See also Incident No. 4 (Table 4)	Note 1	1	2	**Low**
Clay (Potential for off-site tracking onto public roadway) – See also Incident No. 5 (Table 4)		2	2	**Medium**
Sedimentation Dams No 1, 2, 3 & 4 (Off-site discharge breaching EPL compliance conditions) – See also Incident No. 2 (Table 4)		1	1	**Low**
Kiln Stack Release of air emissions (visible smoke) – See also Incident No. 7 (Table 4)		1	1	**Low**
Note 1: Providing a maximum quantity of clay / dust / water / sediment / air emissions is not possible within any practical accuracy.				

Table 2 – Risk Assessment Matrix

Measures of Consequence		
Value	**Description**	**Impact**
1	Minor	On-site release immediately contained
2	Moderate	On-site release contained with outside assistance
3	Major	Off-site release with specialist assistance and clean up required
Measures of Likelihood		
Value	**Description**	**Impact**
3	Highly Likely	The event could occur weekly in normal circumstances
2	Likely	The event could occur once per month
1	Unlikely	The event could occur once every one to five years

Risk Ranking			
LIKELIHOOD	**CONSEQUENCE**		
	Minor (1)	**Moderate (2)**	**Major (3)**
Highly Likely (3)	M (3)	H (6)	H (9)
Likely (2)	L (2)	M (4)	H (6)
Unlikely (1)	L (1)	L (2)	M (3)

3 PRE-EMPTIVE MEASURES

Pre-emptive measures implemented to minimise the risk of a pollution incident associated with key Site activities include the following:

3.1 PIRMP ADMINISTRATION

A copy of the PIRMP will be available on-site at all times. The PIRMP will be the subject of annual training and testing amongst relevant Site employees, PGH personnel and contractors to ensure at all times there is a high level of awareness of response and reporting requirements.

The PIRMP will be the subject of at least an annual review or within 30-days of a pollution incident. Any revised versions of the PIRMP will be posted on the PGH website within 14-days of internal approvals of amendments.

Inductions of new employees, contractors and visitors will include key aspects of the PIRMP such as alarm warnings, emergency evacuation points and safety muster locations to minimise potential harm to people on or likely to be on the Site during a pollution incident.

3.2 STORAGE AND MANAGEMENT OF POTENTIAL POLLUTANTS

3.2.1 Diesel and Chemical Storage

- Diesel storage comprises of a double-skinned aboveground storage tank (Refer to Figure 2);
- The diesel tank and refueling operations are subject to safety/environmental controls, emergency response, periodic inspection and maintenance;
- The diesel tank is located in a secure section of the Site with locks on the refueling nozzles;
- Storage of bulk and packaged chemicals (i.e. oils, solvents, pants and oxides) is undertaken in secure, contained and roofed areas away from any immediate stormwater drain (i.e. Dangerous goods cabinets and designated storage areas);
- During their on-site transport, bulk and packaged chemicals are secured to minimise potential for spills;
- Fire-fighting and spill response equipment are readily accessible for incident response; and
- Stock inventory and control is undertaken to minimise on-site quantities and volumes of potential pollutants.

3.2.2 Sedimentation Dams and Stormwater Drainage

The Site has four main Sedimentation Dams (Refer to Figure 2) to which all respective stormwater catchment areas would drain into (i.e. no off-site discharge of stormwater). Management of the Dams include:

- Monitoring and controlling water levels through onsite reuse to minimise overflow discharges during heavy rain events;
- Inspection and maintenance of dam integrity and pumping equipment;
- Appropriate storage and movement of potential pollutants with consideration to potential impacts to stormwater quality;
- Availability of a number of spill response kits in areas with potential for spills and Site personnel trained in their use; and
- Stormwater and sediment management over disturbed areas, including risk-based progressive rehabilitation.

3.2.3 Air Quality

The Site manages air quality in accordance with EPL requirements which includes the following actions:

- Stockpile locations and height are managed to minimise wind-borne dust events;
- Dedicated stockpile sprays and water cart available at all times;
- Vehicle speed restrictions;
- Limit or postpone operations with likelihood of pollution during unfavourable weather events; and
- Kiln operations in a manner that complies with EPL requirements

3.2.4 Equipment and Vehicles

- Oil water separator inspected and serviced in accordance with specifications;
- Heavy vehicles hydraulic and fuel systems subject to a maintenance program;
- Wheel shaker and wash facility to prevent tracking of materials onto public roadways: and
- Spill kits inspected for contents and replenished if used/required.

4 PIRMP ACTIVATION

4.1 PIRMP RESPONSE TEAM

The PIRMP will be activated in the event of an incident causing or potential to cause material harm by the authorised response team list in Table 3. Pending the nature and severity of a pollution incident, there may be a requirement to engage external specialist assistance and contact details are also provided in Table 3.

Table 3: PIRMP Team Roles and Responsibilities

PIRMP Response Team	Roles & Responsibilities	Contact Details
John Haynes (Plant Manager) Available 24 hours	• Receives internal notification of an incident and response updates • In collaboration with National WHSE Manager notifies Authorities and Neighbours and provides updates • Coordinates with Emergency Services if providing on-site response assistance • Engages specialists to clean-up and undertake any remediation necessary • Facilitates incident investigation and provides Report to EPA and internal stakeholders	**Phone:** **(02) 6026 3210** **Mobile: 0438 703 096** **Email:** jahaynes@csr.com.au
Luke Blanchard	• PIRMP response • Communication of PIRMP response status to Plant Manager • Coordinates with Emergency Services if providing on-site response assistance • Member of incident investigation team	
Troy Habermann	• Back-up for PIRMP response if required • Assists Plant Manager with neighbor alerts and ongoing progress status	
Cleanaway	Assistance with emergency response and clean-up of significant spill events if required	Emergency Spill Hotline 1800 SPILLS
Caltex	Provides emergency response and clean-up of significant spill specific to Diesel area if required	1800 033 111

4.2 PIRMP Actions

Figure 2 presents key Site locations and where there is considered potential for pollution incidents to cause material harm and will require the activation of the PIRMP. Table 4 details specific PIRMP actions in response to potential pollution incidents associated with each of the locations.

Figure 2: Locations with Potential for Material Harm Pollution Incidents

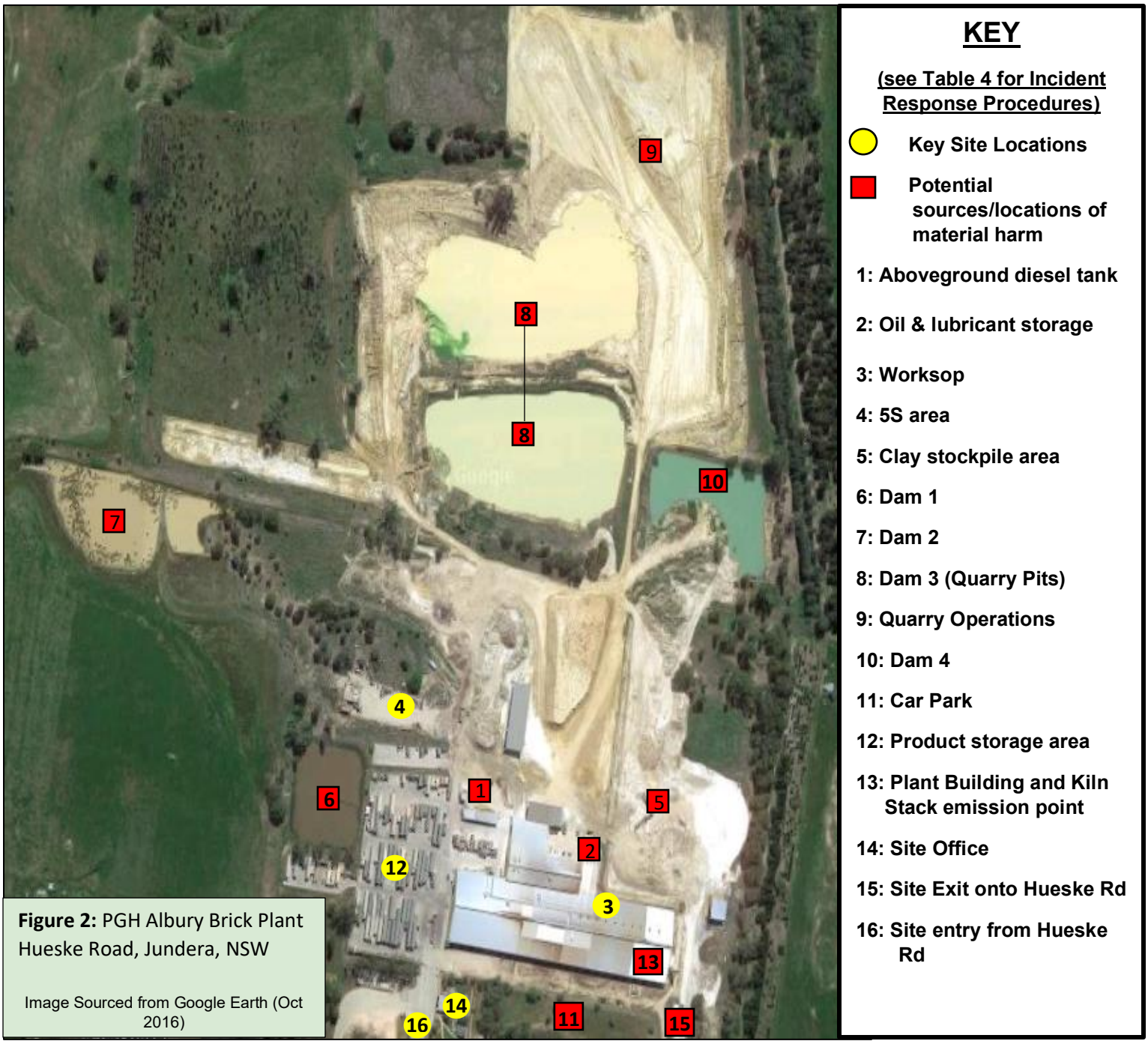

Figure 2: PGH Albury Brick Plant Hueske Road, Jundera, NSW

Image Sourced from Google Earth (Oct 2016)

Table 4: PIRMP Actions

Incident and Scale of Impacts	PIRMP Action	Post-PIRMP Action
Incident response No 1: Catastrophic failure of above ground diesel tank (see Site Location No. 1 in Figure 2).		
Scale of impacts The tank is double skinned. However, if ruptured or valve left open for a prolonged period there is potential to contaminate soil and Dam No.1. Contamination specialists will advise if groundwater investigation is also required. **Note:** Minor spills and leaks able to be responded to by spill kit and cleaned-up without external specialists would not be classified as Material Harm	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • Contact local neigbours **(refer to Section 5.2**) if potential to be in inundated by diesel impacted water overflowing from sedimentation Dams No. 1 & 2 and provide periodic updates (i.e. there is potential for incident to occur during extreme rain event) • Area to be restricted to PIRMP Response Team, Authorities, and specialised response contractors engaged in incident response • Evacuate area if fire or explosion potential exists. • Undertake all possible actions to prevent/minimise diesel spreading and entering sedimentation Dam No 1 – i.e. Use of spill kits and if necessary, construction of earthen bunds and diversions around spill to contain/divert diesel until external incident response specialists arrive • Co-ordinate with Authorities and specialised response contractors (as required)	• Provide update to all Authorities and neighbours contacted during the incident • If diesel spill has impacted unsealed soil/surface water – engage Environmental Consultants to investigate and remediate as required contamination to soil, surface waters (i.e. Dam No.1) and if required groundwater • Assess Duty to Report contamination to EPA under S60 of the *Contaminated Land Management Act (1997)* • Engage environmental consultants to commence water quality monitoring program to assess any ongoing contamination issues • Check and replenish response equipment/resources • Dispose of contaminated response material through licenced contractor • Investigate incident and review PIRMP within 30-days of incident • Implement incident investigation learnings – including tank/installation area/maintenance and PIRMP response efficiency • Communicate investigation and corrective actions to Authorities and neighbours

Incident Response No. 2: Catastrophic failure or overflows of Site Dams (see Site Locations No. 6, 7, 8 & 10 in Figure 2).		
Scale of impacts In the event of dam failure or significant rainfall, there is potential for contaminated and sediment laden water within dams to be discharged onto neighboring properties. If dam water quality is poor or contaminated, overflows may pose a health risk to human and livestock/animal health.	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • Contact local neigbours **(refer to Section 5.2**) with potential to be in inundated or impacted by water quality and provide periodic updates – agisted livestock may require removal from impacted areas • Area to be restricted to PIRMP Response Team and Authorities engaged in incident response • Co-ordinate with Authorities (if responding to incident) • Instigate traffic controls if off-site roadways are likely to be impacted • Divert water flow away from sensitive receptors (i.e. neighbours or other dams and roadways) • If water quality permits, pump water from overflowing dam to other dams if adequate freeboard exists (only if this action results in less impacts to neighbours / environment) • If water quality is poor or contaminated - Environmental Consultants to be engaged to investigate and remediate impacted areas	• Provide update to all Authorities and neighbours contacted during the incident • Contact engineers/contractors to rebuild Dams immediately and clean-up any off-site impacts • Engage Environmental Consultants to investigate possibility of chemical contamination and remediate as required impacts to soil, groundwater and surface waters • Assess Duty to Report contamination to EPA under S60 of the *Contaminated Land Management Act (1997)* • Investigate incident and review PIRMP within 30-days of incident • Check and replenish response equipment/resources • Dispose of contaminated response material through licenced contractor • Implement incident investigation learnings • Communicate investigation and corrective actions to Authorities and neighbours
Incident Response No. 3: Loss off oil/solvents, packaged goods (see Site Location No. 2 in Figure 2).		
Scale of impacts Any incident such as a spill or leak would be restricted to chemical	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates	• Provide update to all Authorities and neighbours contacted during the incident

storage area with minimal external impact. However, there is a low potential for soil and surface water contamination that would require specialist investigation/remediation.	• Contact local neigbours **(refer to Section 5.2**) **<u>only</u>** if there is potential for stormwater or Dams to be impacted and provide periodic updates (i.e. there is potential for incident to occur during extreme rain event) • Area to be restricted to PIRMP Response Team, Authorities, and specialised response contractors engaged in incident response • Evacuate area if fire or explosion potential exists. • Undertake all possible actions to prevent/minimise diesel spreading and entering sedimentation Dam No 1 – i.e. Use of spill kits and if necessary, construction of earthen bunds and diversions around spill to contain/divert diesel until external incident response specialists arrive • Co-ordinate with Authorities and specialised response contractors (as required)	• If diesel spill has impacted unsealed soil/surface water – engage Environmental Consultants to investigate and remediate as required contamination to soil, surface waters (i.e. Dam No.1) and if required groundwater • Assess Duty to Report contamination to EPA under S60 of the *Contaminated Land Management Act (1997)* • Engage environmental consultants to commence water quality monitoring program to assess any ongoing contamination issues • Check and replenish response equipment/resources • Dispose of contaminated response material through licenced contractor • Investigate incident and review PIRMP within 30-days of incident • Implement incident investigation learnings – including tank/installation area/maintenance and PIRMP response efficiency • Communicate investigation and corrective actions to Authorities and neighbours
Incident Response No. 4: Extreme dust event associated with Quarry Pit and Stockpiles (see Site Locations No. 5 & 9 in Figure 2).		
Scale of impacts There is potential during extreme weather events that dust from quarry operations may adversely impact upon the surrounding	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • Contact local neigbours **(refer to Section 5.2**) with potential to be adversely impacted by dust emissions and provide periodic updates	• Provide update to all Authorities and neighbours contacted during the incident • Offer clean-up of houses and cars impacted by dust emissions

environment and amenity of neighbours	• Cease activities contributing to dust emissions • Increase dust controls such as water cart operation and sprays • Consider if additional water cart or other controls are required to further reduce dust emissions	• Investigate incident and review PIRMP within 30-days of incident • Implement incident investigation learnings • Communicate investigation and corrective actions to Authorities and neighbours
Incident Response No. 5: Excessive tracking of material onto Hueske Road (see Site Location No. 15 in Figure 2).		
Scale of impacts Incident would normally be restricted to immediate roadway for 500m either side of plant entrance.	• If tracking incident is significant (i.e. likely to disrupt traffic and clean-up period to extend to several hours), contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates on initial manual clean-up by PGH personnel and contact Albury Council for road sweeper if required • Investigate and cease activity that is found to be the source of material being deposited on Hueske Road • Contact local neigbours **(refer to Section 5.2**) with potential to be adversely impacted by material on roadway and provide periodic updates	• Provide update to all Authorities and neighbours contacted during the incident and provide update on clean-up response and status of roadway • Investigate cause of tracking and implement controls to avoid future incidents • Review PIRMP within 30-days of incident • Communicate investigation and corrective actions to Authorities and neighbours
Incident Response No. 6: Fuel tank / oil sump / hydraulic oil loss from mobile plant or light vehicles (see Site Locations No. 11 and all trafficable areas in Figure 2).		
Scale of impacts An incident involving mobile plant or light vehicles would be localised to the area with remote potential for off-site impacts. However, if incident occurred near a drainage channel to surface waters there may	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • If there is potential for surface waters to be impacted and overflowing during pollution incident, contact local neigbours **(refer to Section 5.2**) with potential to be adversely impacted by contaminated water • Stop, contain and divert any spill from further entering stormwater drainage channels leading to	• Provide update to all Authorities and neighbours contacted during the incident • If spill has impacted unsealed soil/surface waters – engage Environmental Consultants to investigate and remediate as required contamination to soil, surface waters and if required groundwater • Engage environmental consultants to commence water quality monitoring program to assess any

be potential for material harm.	surface waters using spill kit and if necessary construct earthen bund/diversions • If possible, commence pumping pollutants back out of stormwater drainage channels prior to reaching surface waters • Engage environmental consultants and incident response contractors to assist with incident response, clean-up, contamination investigation and remediation (soil and water)	ongoing contamination issues associated with the surface waters • Assess Duty to Report contamination to EPA under S60 of the *Contaminated Land Management Act (1997)* • Check and replenish response equipment/resources • Dispose of contaminated response material through licenced contractor • Investigate incident and review PIRMP within 30-days of incident • Communicate investigation and corrective actions to Authorities and neighbours
Incident Response No. 7: Excessive Kiln emissions (see Site Location No. 13 in Figure 2).		
Scale of impacts Incident would likely be restricted to immediate neighbours only on the Eastern end of the site. Excessive emissions would likely be an impact on neighbours' amenity. The magnitude of any material harm would not be able to be determined and as such a conservative approach should be adopted.	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates on Kiln response actions • Contact local neigbours **(refer to Section 5.2**) with potential to be adversely impacted by Kiln emissions and provide periodic updates • Review kiln burner controls • Implement adjustments to burner setup • Re-evaluate stack • If unable to contain, proceed to shutdown burner groups through stages until cause is found	• Provide update to all Authorities and neighbours contacted during the incident and provide update on Kiln response and status of emissions • Once Kiln emissions are returned to normal: • Investigate incident and review PIRMP within 30-days of incident • Communicate investigation and corrective actions to Authorities and neighbours • Include incident in EPA Annual Return as a non-compliance with air emissions

5 PIRMP NOTIFICATION AND COMMUNICATION

5.1 NOTIFICATION OF AUTHORITIES

In the event of a pollution incident causing or potential to cause material harm, the Plant Manager or National WHSE Manager will notify the Authorities listed in Table 5. All Site employees and Contractors must either through inductions and training be aware of reporting any actual or potential pollution incidents directly to Site Managers.

If the incident has an immediate threat to human health or property, Emergency Services will be the first of the Authorities to be contacted as they will be able to provide initial advice and if requited, on-site assistance in controlling, containing and combating incidents.

If the incident does not require emergency services, or once the triple 000 call has been made, notification of the other relevant Authorities listed in Table 5 must be undertaken.

The information to be provided to the Authorities will include the following:

- The time, date, nature, duration and location of the incident
- The estimated quantity or volume of any pollutants involved
- An initial understanding of the circumstances in which the incident occurred
- The action taken or proposed to be taken by internal and external resources to deal with the incident and any actual or potential pollution arising from the incident

Table 5: Authority Contact Details

Authority	Contact Details.	Notification Responsibility
Emergency Services • Fire and Rescue NSW • NSW Police • NSW Ambulance Service	Call: 000	Either of the following managers are responsible for notification to Authorities: John Haynes (Plant Manager) Mobile: 0438 703 096 (Available 24hrs) Luke Blanchard (Production Supervisor) Mobile: 0418 796 679 (Available 24hrs)
NSW EPA	131 555	
WorkCover Authority	131 050	
Albury City Council	8:30am to 5pm (02) 6023 8111 After Hours 1300 133 391	
Albury Public Health Unit	BH: (02) 6080 8900 AH: (02) 6080 8900	

5.2 COMMUNICATIONS WITH NEIGHBOURS AND COMMUNITY

In the unlikely event that neigbours or the wider community may be impacted by a pollution incident associated with Site operations, the Plant Manager (or nominated PGH personnel) as deemed appropriate will either phone, email, text or door knock neighbouring residents to provide the following information:

- Nature of the incident, response being undertaken and any precautions that may be required to reduce the risk of impact on their health and amenity i.e.
  - Close windows during a significant dust event
  - Avoid driving on impacted road ways (i.e. dam overflows/fuel leaks/clearance for emergency services)
  - Avoid any dermal contact with dam overflow water as it may be contaminated
- Likely duration and periodic updates on the status of the incident;
- End of incident response and any associated residual risks that may exists until appropriate clean-up/remediation can be completed; and
- Summary of incident investigation and learning to minimise a repeat of the event.

6 PIRMP TESTING AND TRAINING

6.1 PIRMP TESTING

The PIRMP will be tested and reviewed on at least an annual basis or within a month (30 days) of a pollution incident occurring at the Site. A summary report will be prepared for each PIRMP test that will detail results and learnings against the scope and actions presented in Table 6.

Table 6: Scope and Actions of PIRMP Tests

Scope / Action
Include PIRMP Response Team and Managers representative of 24-hour Shift Operations
Response to simulated pollution incident associated with activities, equipment and materials associated with Site operations (under rain / dry / windy scenarios)
Communication and notification with Plant Managers, Authorities and neighbours/communities
Level of availability, awareness, efficiency and effectiveness in the use of incident response resources
On-site coordination with external response services/Authorities - pending incident severity
Minimising harm to people on-site – will simulated incident require site warning alarm / evacuation
Combating/minimising the pollution caused by incident
Discuss - Inspection, maintenance and replenishment of response equipment/materials used in responding to incident
Discuss - Clean-up and disposal of contaminated response materials through licensed contractor
Review of PIRMP to reflect any learnings from simulated PIRMP Test
Schedule next PIRMP Test

6.2 PIRMP Training

PIRMP training will be conducted through either formal awareness sessions, inductions, toolbox style presentations or simulated incidents. The frequency of training will be at least annually for the PIRMP response team and Plant Managers. Training will also be provided to new employees and contractors through inductions and on an as required basis. A training register will be maintained detailing attendees and the manner in which training was provided.

The objective of the training will be to ensure Plant Managers, incident response team, relevant site employees and contractors are aware of the pollution risks associated with operations, response equipment and materials and they know of their roles and responsibilities in the administration and activation of the PIRMP.

6.3 PIRMP Training and Testing Schedules

Routine PIRMP training and testing will be conducted in accordance with dates and scope presented in Table 7. All training and drills will be documented detailing attendance, nature of simulated drill, learnings and associated amendments to PIRMP.

Table 7 will reflect previous 4 years of tests and training.

Table 7: Completed and Scheduled PIRMP Training and Tests

Date	Test / Training	Scope	Status
28/05/2013	Test	Diesel oil spill (see Report: 28/05/13)	Completed
26/09/2014	Test	Diesel oil spill	Completed
26/09/2015	Test	Diesel oil spill	Completed
18/10/2016	Test	Desktop - Simulated Hydraulic Oil Spill – See ECS Report and attendance register	Completed
18/10/2016	Training	POEO Act/Regulation Requirements – See ECS training package and attendance register	Completed
Prior to July 2017	Test & Training	Simulated incident to be determined, however, 2017 PIRMP Drill will be field based and not a desktop	Completed
17/7/2017	Training	POEO Act/Regulation Requirements – See ECS training package and attendance register	Completed
18/9/2018	Training	Diesel oil spill	Completed
25/9/2019	Test/training	Diesel fuel spill	Completed
16/9/2020	Test/training	Diesel fuel spill	Completed
25/6/2021	Test/training	Diesel fuel spill	Completed
29/6/2022	Test/training	Grease spill	Completed
26/05/2023	Test/training	Excavator oil spill	Completed

06/05/2024	Test/Training	Diesel spill from truck	Completed
28/05/2025	Test/Training	Diesel spill from tank	Completed