Pollution Incident Response Management Plan

CECIL PARK BRICK PLANT
69 - 77 Cecil Road, Cecil Park NSW 2178

October 2025

PGH CECIL PARK
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

Workplace Information			
Licensee:	**CSR Building Products Limited (CSR PGH Cecil Park)**	**EPA Licence Number:**	**1027**
Workplace:	**PGH Cecil Park**		
Workplace Address:	**69 – 77 Cecil Road, Cecil Park NSW 2178**		
Nearest cross street:	**Brolen Way**		
Workplace Hazards	Diesel, Petrol, Natural Gas Oils / Grease Sediments Stormwater runoff	Asbestos Sewer overflow Oxides, Additives, Slurry Odours, Stack Emissions	

Contents

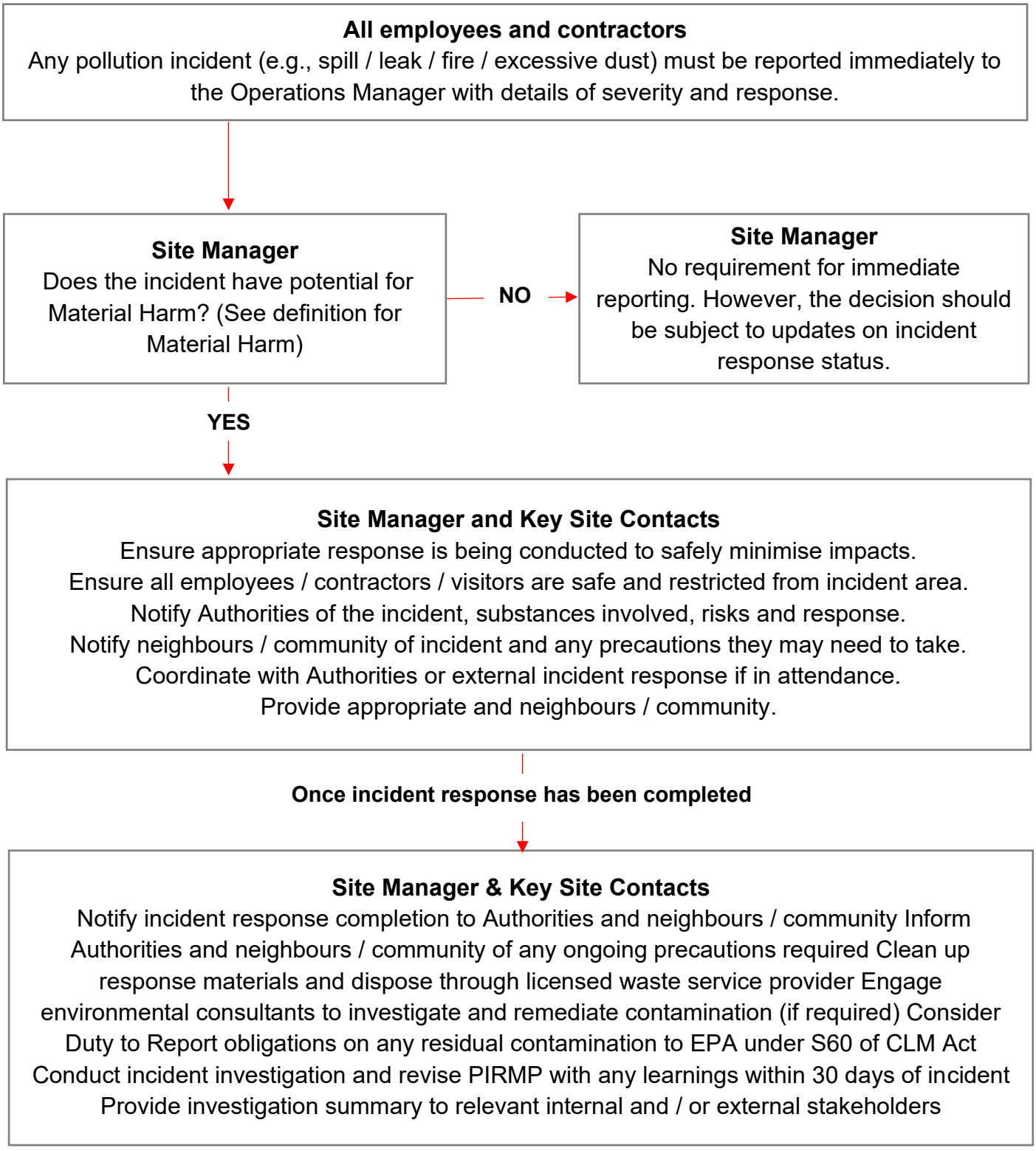
Version	Author	Date of Change
8	Operations Manager	Nov 2025
8	Operations Manager	Oct 2024
7	Regional WHSE Manager & Operations Manager	Oct 2023
6	Operations Manager	May 2022
5	Operations Manager	May 2021
4	Operations Manager	Feb 2020
3	Operations Manager	Jan 2019
2	Operations Manager	Jan 2018
1	Operations Manager	Dec 2017
0	ECS	Jan 2017

1 Plan Activation

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the site must **immediately** implement this plan.

A pollution incident is any 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.

2 PIRMP Activation Procedure – Immediate Response



3 Key Site Contact Details

Names, roles and 24-hour contact details of individuals who:
(i) are responsible for activating the PIRMP;
(ii) are authorised to notify relevant authorities under the Act, section 148, and
(iii) are responsible for managing the response to a pollution incident.

(There must be at least 2 people specific to the workplace listed)		
Name	**Role**	**Phone Number**
Nathan Paoloni	**Operations Manager**	Business Hours: 02 9826 3928 After Hours: 0419 476 164
Ali Nozari	**Maintenance Manager**	Business Hours: 02 9826 3923 Mobile: 0499 699 435
	Kiln Operator	Mobile: 0419 476 347
Ben King	**NSW Raw Materials Manager**	Phone: 02 9826 3952 Mobile: 0437 832 572
Laura Besley	**Head of Sustainability**	Mobile: 0467 548 213
Cleanaway	**Waste Collection**	Phone: 1800 SPILLS (774 557)
Caltex	**Diesel Collection**	Phone: 1800 033 111

4 Relevant Authority Contact Details

				Contact Number
Police, Fire Brigade, Ambulance				000
EPA – Environment Line				131 555
Fairfield City Council				02 9725 0222 www.fairfieldcity.nsw.gov.au
Fairfield Hospital				02 9616 8240
SafeWork NSW				131 050
Neighbouring Facilities (Detail mechanisms for providing early warnings and regular updates to owners / occupiers of nearby premises)				
Receptor	**Nature of Occupancy / Sensitivity**	**Approx. Distance**	**Direction from Site**	**Contact**
Sydney Regional Environmental Plan No. 31	Parklands	200m	South East	02 9725 0222 86 Avoca Rd Wakeley NSW 2176
House	Residential	456m	East	28 Cecil Rd
House	Residential	446m	North East	30 Cecil Rd
House	Residential	410m	North East	72 Cecil Rd
House	Residential	302m	North	119-127 Cecil Rd
House	Residential	382m	North	139 Cecil Rd
Market Garden	Business	173m	North	15-23 Brolen Way
House	Residential	260m	North West	31 Brolen Way
House	Residential	236m	North West	43-45 Brolen Way
House	Residential	444m	North West	69-73 Brolen Way
House	Residential	435m	North	75-87 Brolen Way
House	Residential	480m	North	89-101 Brolen Way
House	Residential	590m	North	89-101 Brolen Way
House	Residential	494m	North	103-127 Brolen Way

House	Residential	314m	West	1205-2053 Elizabeth Dr
House	Residential	308m	South West	2055-2063 Elizabeth Dr
House	Residential	394m	West	2065 Elizabeth Dr
Market Garden	Business	173m	West	2083 Elizabeth Dr
House	Residential	504m	South West	2085 Elizabeth Dr
House	Residential	445m	South West	2073 Elizabeth Dr
School	Primary	574m	South West	2089-2101 Elizabeth Dr
House	Residential	118m	South	1192 Elizabeth Dr
House	Residential	118m	South	1197 Elizabeth Dr
Other Contacts				
Police Station (local): Green Valley Police Station Wetherill Park				 02 9607 1799 02 8788 5199
Fire Station (local): Horsley Park Fire Station				02 9620 1386
SES (Storm Damage): Liverpool Unit				132 500
Other: Corporate Security				1300 658 809 0432 316 888
Emergency Spills Response: Transpacific (24hr)				1800 774 557 02 8723 6700
RSPCA Animal Shelter				02 9770 7555
Wildlife Emergencies				1300 094 737
Asbestos: Australasian Technical Services (ATS)				02 9605 4733
Gas Provider: Origin / Jemena				131 909
Electricity Provider: Origin / Endeavour Energy				131 003
Water Provider: Sydney Water				132 090

5 Site Specific Hazards to Human Health or the Environment

Refer to site's Aspects and Impacts Register, Site Risk Register and Emergency Response Plan.

Hazard	Controls	Location
Significant overflow event from site dam. Potentially contaminated and sediment laden water may discharge beyond site boundaries during extreme weather events.	**Control:** All materials stored in controlled environment. Procedures in place for filling, storing and decanting. **Response:** Contain spill where possible, prevent from entering drain system or soil. Close any discharge valve to prevent off site flows. Divert water flow away from sensitive receptors (i.e. neighbours). Determine if required to contact all relevant Authorities (refer to Section 4) and provide periodic updates. Determine if local neighbours (refer to Section 5.2) need to be contacted if there is the potential to be in inundated by water and provide periodic updates. Area to be restricted to PRIMP Response Personnel. Co-ordinate with Authorities (if responding to incident). Instigate traffic controls if off-site roadways impacted. **Post Response:** Provide update to all Authorities and neighbours contacted during the incident. Contact contractors to rebuild dams immediately and clean-up any off-site impacts. If any release from Site onto unsealed soil/surface water or chemical contamination - Environmental Consultants to be engaged to investigate and remediate contamination. Assess Duty to Report contamination to EPA. Investigate incident and review PIRMP within 30-days of incident. Implement incident investigation learnings.	Site dam *(Location 8 & 9 in Figure 1)*
Chemical / duels entering stormwater drains. The site has a number of stormwater drains that all flow into the site dam. As such if any pollutants enter drains the water quality of the dam must be investigated.	**Control:** Correct storage of materials, drain maintenance, dam containment holding of stormwater on site. **Response:** Isolate stormwater system pumps from operating preventing possible contaminated water from entering decant pond. Isolate decant pond discharge system to prevent any contaminated water from entering waterway. Determine if required to contact all relevant Authorities (refer to Section 4) and provide periodic updates. If there is potential for the Site Dam to overflow during pollution incident, determine if local neighbours need to be contacted (refer to Section 5.2) and advised of the potential to be adversely impacted by contaminated water.	*(see figure 1 for potential extent of impact)*

	Stop, contain and divert any spill from further entering stormwater drains using spill kit and if necessary construct earthen bund/diversions. If possible, commence pumping pollutants back out of stormwater drain prior to reaching the Site Dam. Engage environmental consultants and incident response contractors to assist with incident response, clean-up, contamination investigation and remediation (soil and water). **Post Response:** 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 ongoing contamination issues. 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.	
Extreme dust event associated with stockpiles and raw materials area. There is potential during extreme weather events that dust from quarry operations may adversely impact upon the surrounding environment and amenity of neighbours.	**Control:** Active management of stockpiles and raw material stock. Scheduled water cart operation and spraying. **Response:** Contact all relevant Authorities (refer to Section 5.1) and provide periodic updates. Determine if required to contact local neighbours (refer to Section 5.2) with potential to be adversely impacted by dust emissions and provide periodic updates. 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. **Post Response:** Provide update to all Authorities and neighbours contacted during the incident. Offer clean-up of houses and cars impacted by 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.	Rear of factory (south) adjacent to site dam and brick yard *(refer to Figure 1)*

Bushfire event impacting site Pollutants stored and used on site impacting the surrounding environment.	**Control:** Correct storage of materials, drain maintenance on site. Brick storage surrounding activity providing natural fire barrier. Rainwater systems regularly inspected and managed. Regular housekeeping and site maintenance onsite to reduce flammable waste / product in possible bushfire paths. **Response:** Active site Emergency Response Plan for bush fires / neighbouring fire event. Determine if required to contact all relevant Authorities (refer to Section 4) and provide periodic updates. Engage environmental consultants and incident response contractors to assist with incident response, clean-up, contamination investigation and remediation (soil and water). **Post Response:** As per site Emergency Response Plan. Check and replenish response equipment/resources. Dispose of contaminated response material through licenced contractor. Engage Environmental Consultants to investigate and remediate as required. Investigate incident and review PIRMP within 30-days of incident. Communicate investigation and corrective actions to Authorities and neighbours.	

6 Site Environment Hazard Controls

A summary of the preventative controls control systems, procedures and preventative maintenance routines need to be summarised for all risks with a pre-control rating of MODERATE, HIGH, VERH HIGH and those that have been identified with a potential for material harm.
Details of conditions or events that could, or would, increase the likelihood, of occurrence should be detailed
Site Spill Control and Evacuation Procedures must be included.

Hazard	Uncontrolled risk rating / score	Preventative Controls	Controlled risk rating / score	Has hazard been effectively managed?	Emergency Response Procedures	Maintenance Testing	Training
Areas of exposed land and clay surfaces resulting in releases to water and sediment runoff	High	• Stormwater Storage Dam (SAP PM's in place) • Silt fencing (SAP PM's in place, • BRK-CP-3.7-P03 Stormwater System Operation • BRK-CP-4.1-D05 Stormwater and Drainage System • BRK-CP-4.1-F09 Environmental Field Checklist	Medium	Yes √ No☐	• WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park	• BRK-CP-4.1-F01 Stormwater Sample Collection Observation Sheet • BRK-CP-4.1-D23 Environmental Monitoring Requirements • Water quality monitoring	• Internal & External spill response training.

Emissions to air from clay transportation	High	• Water truck operating, Dust control plan • BRK-CP-3.10.6.1-P12 Water Truck Operating Procedure • Sprinklers	Low	Yes √ No☐		• BRK-CP-4.1-D23 Environmental Monitoring Requirements	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy
Energy / noise emissions from clay transportation	Medium	• Hours of operation listed in licence • Perimeter bund wall • Low frequency squawkers fitted to all raw material mobile plant	Low	Yes √ No☐		• Vehicle maintenance (contractor responsibility) • BRK-CP-4.1-D23 Environmental Monitoring Requirements	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy • Complaint register and procedure
Manufacturing & Clay Prep Operations on site where noxious weeds may impact the biodiversity	Medium	• BRK-CP-3.7-P05 - Environmental Management Plan - Weed and Pest Management	Low	Yes √ No☐		• Weed control activities SAP PM: CEC-0564	
Blending of raw materials and reduction of material size resulting in waste and by-products	Medium	• Waste Separation & Licences • BRK-CP-3.10.7-D16 Waste Matrix • BRK-CP-3.10.6.2-P03 Safe Handling of Asbestos Found in the Workplace • Removal / reduction of waste	Low	Yes √ No☐	• BRK-CP-3.11-P01 Emergency Response Plan • WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park		• CSR-WHSE-1 0-POL-01 CSR WHSE Policy
Operation of fixed plant resulting in waste and by-products and energy use	Medium	• Power factor corrections • No excess operation	Low	Yes √ No☐			
Operation of large fixed plant - dried bricks resulting in waste and by-products	Medium	• No excess operation, maintenance, pf capacitors	Low	Yes √ No☐			
Operation of large fixed plant - kiln, transfer cars resulting in emissions	High	• Burner management system - efficient combustion. • Kiln design. • Stack emission testing as per licence condition. • BRK-CP-4.1-F02 Stack Plume Assessment Form	Medium	Yes √ No☐		• SAP PM in place for Kiln burners/stack testing. • BRK-CP-4.1-D23 Environmental Monitoring Requirements	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy
Operation of large fixed plant - kiln,	Medium	• Separation & Licences	Low	Yes √ No☐		• BRK-CP-3.10.7-D16 Waste Matrix	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy

transfer cars resulting in waste and by-products							
Storage of bricks - resulting in releases to water	Medium	• BRK-CP-3.7-P03 Stormwater System Operation • BRK-CP-4.1-F09 Environmental Field Checklist • Observation Sheet • BRK-CP-4.1-D05 Stormwater and Drainage System • BRK-CP-4.1-F09 Environmental Field Checklist • Yard sweeping	Medium	Yes √ No☐	• Bunding, spill response procedures and training • BRK-CP-3.11-P02 Emergency Response Guide • WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park	• Stormwater Storage Dam (SAP PM's in place) • Silt fencing (SAP PM's in place • BRK-CP-4.1-D23 Environmental Monitoring Requirements • Water quality monitoring • BRK-CP-4.1-F01 Stormwater Sample Collection	
Loading of trucks resulting in energy use	Medium	• Hours of operation • Perimeter bund wall	Low	Yes √ No☐			
Operation of maintenance equipment resulting in waste and by-products	Medium	• Separation & Licences • Removal / reduction of waste	Low	Yes √ No☐			• BRK-CP-3.7-P01 Environmental Management • BRK-CP-3.10.7-D16 Waste Matrix
Site processing of sewerage resulting in emissions, release to land	Medium	• Review of input materials • BRK-CP-3.7-P03 Stormwater System Operation	Low	Yes √ No☐	• Bunding, spill response procedures and training • BRK-CP-3.11-P02 Emergency Response Guide • WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park	• Testing, maintenance • BRK-CP-4.1-F01 Stormwater Sample Collection Observation Sheet • BRK-CP-4.1-D23 Environmental Monitoring Requirements	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy
Site diesel delivery and storage resulting in release to land / stormwater	Medium	• Bunding, spill response, oil testing in released water • BRK-CP-3.7-P03 Stormwater System Operation	Low	Yes √ No☐	• Bunding, spill response procedures and training • BRK-CP-3.11-P02 Emergency Response Guide • WHSE-SS-3.11 Appendix 8	• BRK-CP-4.1-F01 Stormwater Sample Collection Observation Sheet • BRK-CP-4.1-D23 Environmental Monitoring Requirements	

					PIRMP Cecil Park		
Site storage of chemicals resulting in release to land / stormwater	High	• Defined storage locations • BRK-CP-3.7-P03 Stormwater System Operation • BRK-CP-3.10.6.1-P08 Filling Manganese Powder into Silo • BRK-CP-3.10.6.1-P07 Filling Limestone Silo • Undercover bunding	Low	Yes √ No☐	• Bunding, spill response procedures and training • BRK-CP-3.11-P02 Emergency Response Guide • WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park	• BRK-CP-4.1-F01 Stormwater Sample Collection Observation Sheet • BRK-CP-4.1-D23 Environmental Monitoring Requirements	•
Site building materials resulting in waste and by-products (asbestos)	Medium	• Strict control, removal by licensed contractor and waste disposal process • Clearance certificate from contractor • Asbestos Management Plan	Low	Yes √ No☐	• Bunding, spill response procedures and training • BRK-CP-3.11-P02 Emergency Response Guide • WHSE-SS-3.11 Appendix 8 PIRMP Cecil Park	• BRK-CP-4.1-D23 Environmental Monitoring Requirements	• CSR-WHSE-1 0-POL-01 CSR WHSE Policy • BRK-CP-3.10.7-D16 Waste Matrix

7 Risk Matrix

					LIKELIHOOD How likely is the chosen level of consequence?				
					RARE	UNLIKELY	POSSIBLE	LIKELY	ALMOST CERTAIN
	IMPACT	PEOPLE	ENVIRONMENT	OPERATIONAL WORKPLACE (e.g., manufacturing / logistics)	• May only occur in exceptional circumstances. • Frequency: every decade or more at CSR / competitor / industry	• Not likely to occur under normal circumstances. • Frequency: within a few years at CSR / competitor / industry	• May occur in some circumstances. • Frequency: within months to years at CSR / competitor / industry	• Common occurrence • Frequency: within weeks to months at CSR / competitor / industry	• Expected to occur. • Frequency: every day / week at CSR / competitor / industry
Potential CONSEQUENCE What is the most credible (likely) highest consequence?	MINOR (1)	• Injury / illness – First aid only. • No Regulator notification required.	• Onsite release, containable with little to no damage. • Remediation (hours). • No regulator notification.	• Minor equipment / system delays / interruptions in manufacturing operations or supply chain but no material impact to operations / output. • Limited impact on staff / contractors. • Locally managed. • Operational Impact < 1day.	1 LOW	2 LOW	4 LOW	7 LOW	11 MEDIUM
	MODERATE (2)	• Injury / illness: – Treatment by a medical practitioner – Reversible (e.g., minor bone break e.g. hairline fracture, finger, toe). • Potentially notifiable to Regulator.	• Onsite release, some damage • Remediation (days). • Minor offsite release, no damage. • Written direction Regulatory Authority PAN, PIN. • On the spot fine. • Complaint from public / neighbours. • Non-compliance reporting to Regulatory Authority.	• Site operable but at reduced capacity for extended period (days). Non-critical supply chain interruption. • Staff / contractors impacted short term. • Operational impact 1-5 days.	3 LOW	5 LOW	8 MEDIUM	**12** **MEDIUM**	**16** **HIGH**
	SIGNIFICANT (3)	• Injury / illness: – referral to medical practitioner for treatment and time off work. – Life-altering (e.g., major bone break e.g., compound fracture, leg) – overnight in hospital. • Notifiable to Regulator. • Prosecution likely.	• Offsite or onsite release short-term detrimental effect, material environmental damage, remediation (weeks). • Immediate report Regulatory Authority (breach of licence condition causing / potential to cause material harm). • Prosecution likely.	• Site operable, key equipment inoperable. • Loss / interruption in manufacturing operations / supply chain causing medium term impacts (weeks). • Critical supply chain interruption. • Significant event contained through management effort / Business Continuity Plan. • Staff / contractors impacted medium term. • Operational impact 5-10 days.	6 LOW	9 MEDIUM	**13** **MEDIUM**	**17** **HIGH**	**20** **SEVERE**
	MAJOR (4)	• Injury / illness: – requires hospitalisation. – Major life-altering (e.g., loss of a limb) – 2-14 days in hospital. • Notifiable to Regulator. • Prosecution expected.	• Major offsite or onsite release, short to medium term environmental damage, remediation (months). • Prosecution expected.	• Loss / interruption in manufacturing operations / supply chain with significant impact over extended period (months). • Critical event escalated and significant management effort to contain impact. • Staff / contractors impacted for extended period. • Operational impact 10-15 days.	10 MEDIUM	**14** **MEDIUM**	**18** **HIGH**	**21** **SEVERE**	**23** **EXTREME**
	CATASTROPHIC (5)	• Fatality(ies) or significant, irreversible disability • Critical life-altering (e.g., loss of limbs) • > 2 weeks in hospital. • Site evacuation. • Notifiable to Regulator. • High-level prosecution expected.	• Major offsite or onsite release, long-term environmental damage. Remediation (years). • High-level prosecution expected.	• Loss / interruption in manufacturing operations / supply chain, long term solutions needed to resolve. • Critical event escalated as management not able to contain. • Staff / contractors impacted long term. • Operational impact >15 days.	**15** **MEDIUM**	**19** **HIGH**	**22** **SEVERE**	**24** **EXTREME**	**25** **EXTREME**

8 Inventory of Potential Pollutants

This includes chemicals and substances that aren't Dangerous Goods (e.g clay, gypsum, sand stockpiles)

Area	Shipping Name	UN No.	Class / Division	Sub Risk	Packing Group	Maximum Quantity
Depot 1, 2, 3	Diesel	3082	9	NA	III	35,000 L
Location 5	Oils, Solvents, Lubricants	1760 1263 1300	8 3	NA	III II	8,000 L
Location 6 & 7	Waste Oils					2,000 L
Location 4	Additives & Oxides	2079	8	NA	II	50,000 kg
Raw Materials / Stockpile locations	Clay	NA	NA	NA	NA	Note 1
Location 8 (Dam 1)	Sediment	NA	NA	NA	NA	Note 1
Depot 10, 16	Aerosols	1950	2.1	NA	NA	86 kg Check
Depot 9	Paints & Painting supplies	1263 3269 1866 1133 1300	3	NA	III II	3,580 L
Depot 21 (Purchasing Store)	Weed & pest control chemicals Septic chemicals	2880 NA 3082 2468	5.1 NA 9 5.1	NA	II NA III	27 L 27 kg
Fitters storeroom	Adhesives, lubricants	1760 3082 NA	8 9 NA	NA	III NA	1 L 67 kg
Depot 8	Cutting fluid	NA	NA	NA	NA	20 L
Depot 13	Resins	NA 2079 3082 2922	NA 8 9 8	NA NA NA 6.1	NA II III II	58 kg 2 L
Site	Adhesives Repellents Lubricants	NA 1950 NA 1956	NA 2.1 NA 2.2	NA	NA	85 kg
Depot 11	Unleaded Petrol	1203	3	NA	II	5 L
Depot 18	Lubricant	NA	NA	NA	NA	16 L
Depot 12	Hydrochloric Acid	1789	8	NA	II	40 L
Note 1: Providing a maximum quantity of clay, dust, sediment is not possible within any practical accuracy						

Figure 1: Locations with Potential for Material Harm Pollution Incidents

9 Safety and Environment Incident Control Equipment

Specific details must be provided in relation to any site or activity-specific safety equipment and must include the location where this equipment is stored and the material safety data information for any chemicals or fuels used or stored at the premises. For example, this could include specific personal protective equipment required for the handling of hazardous chemicals or radioactive substances, specific gas monitoring meters used to monitor gas leaks from tanks, floating booms used to contain spills on water bodies, and specific spill containment equipment.

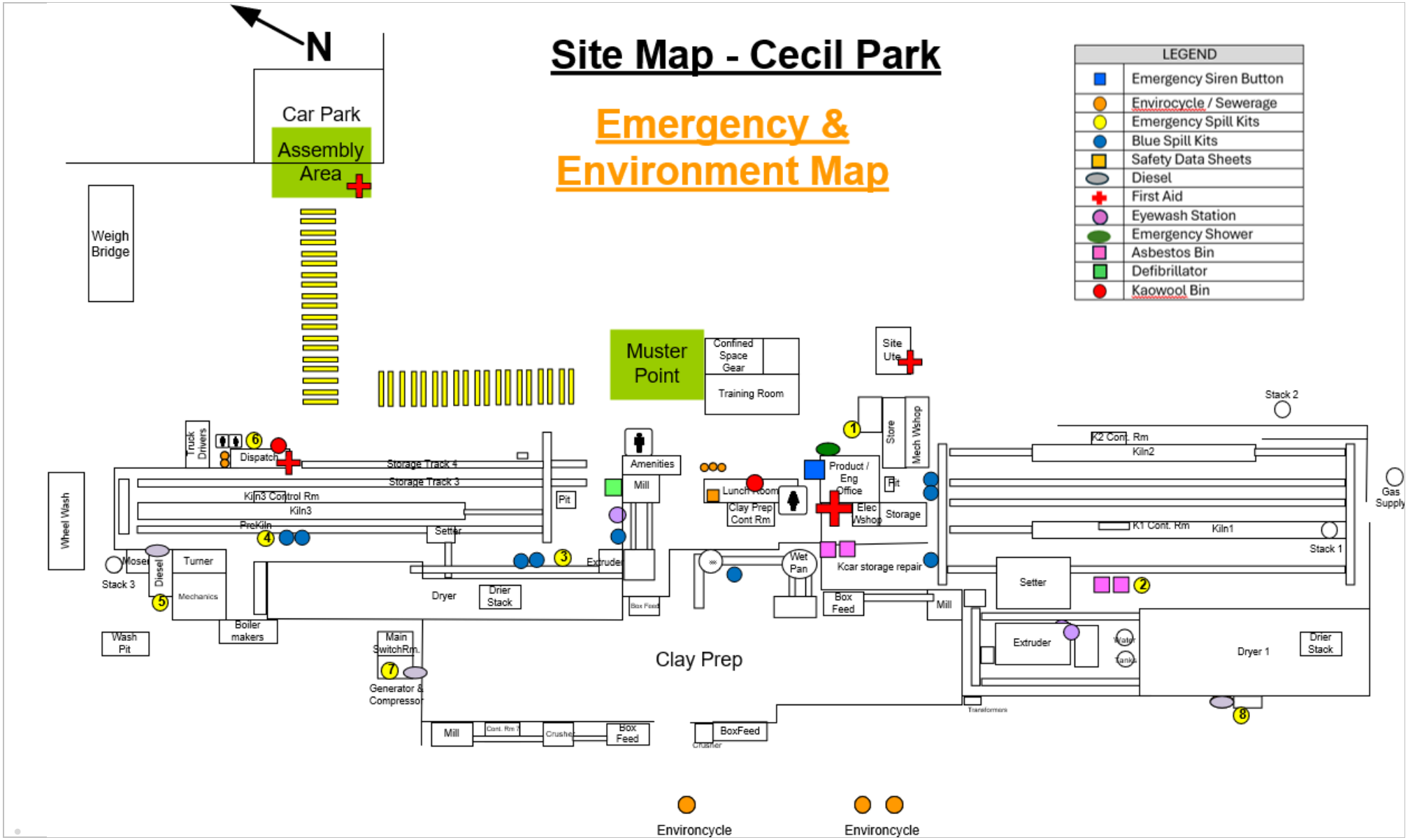
Sites also need to include fire services and isolation points for fuel and power, and other emergency control equipment (storm water isolation valves, emergency flares, spill kit locations, audio visual alarms, etc)

Refer to Visio files located in P:\Cecil Park Factory\SAFETY\SHE Management\SHE Documents\Visio Links

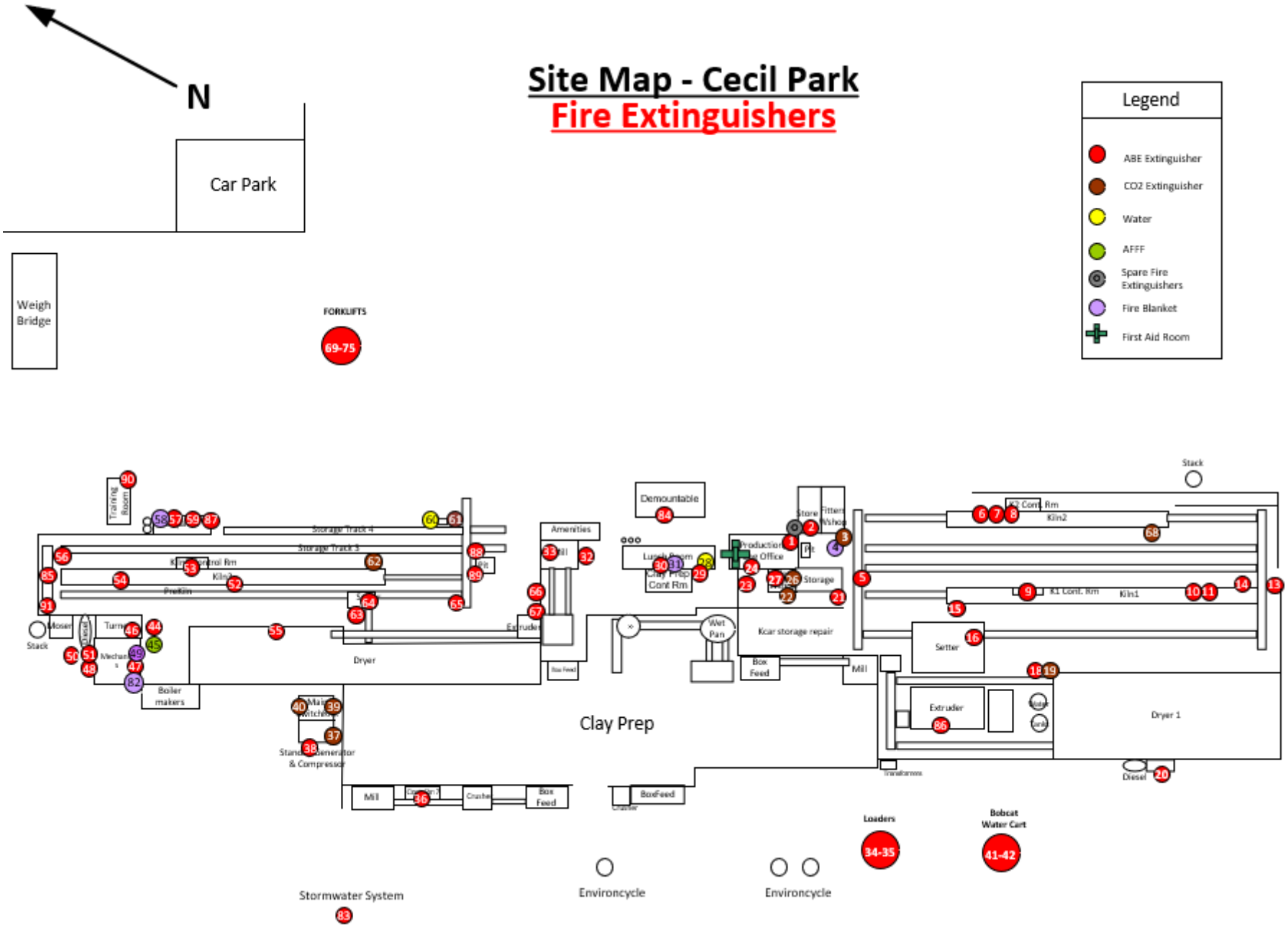
- BRK-CP-3.11-D01 Emergency and Environment Map
- BRK-CP-3.11-D04 Fire Extinguisher Locations

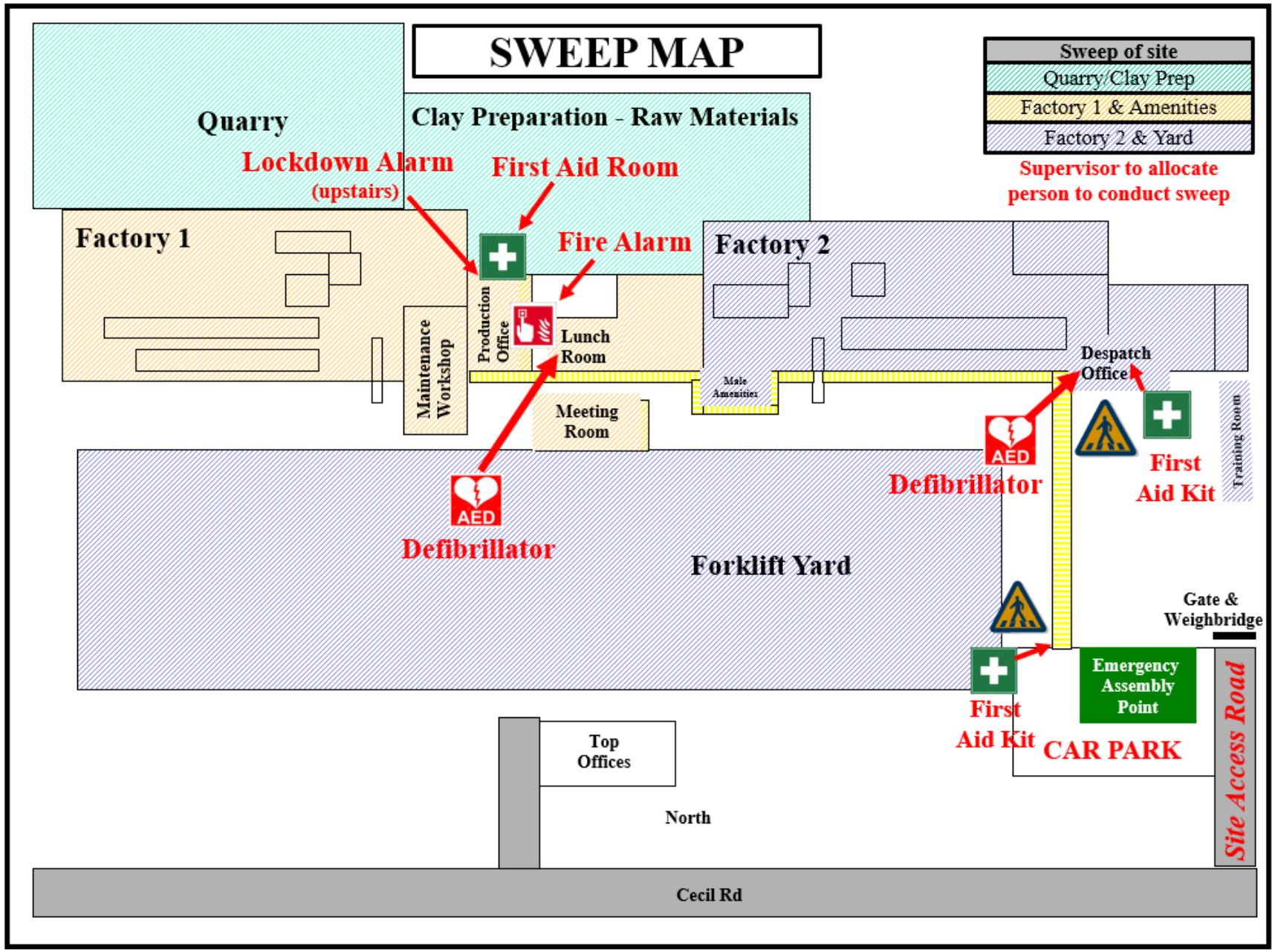
Site Map - Cecil Park

Emergency & Environment Map



Site Map - Cecil Park
Fire Extinguishers





10 Site and Area Maps

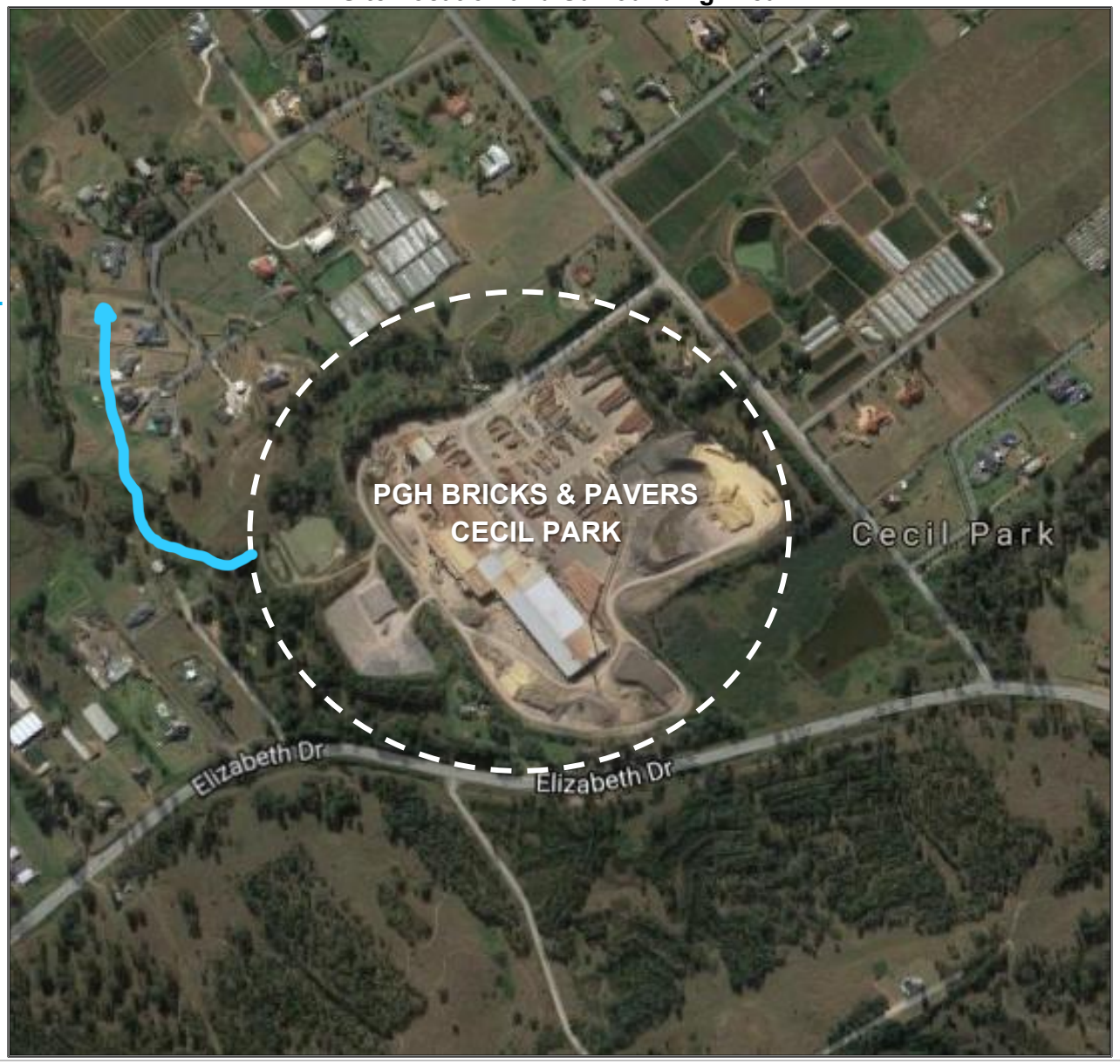
Must include a detailed map, or set of maps, showing:
• location of the premises
• surrounding area likely to be affected by a pollution incident (i.e., sensitive receptors)
• location of potential pollutants on the premises, including underground tanks
• location of any stormwater drains on the premises

Existing maps for Dangerous goods manifest can be used

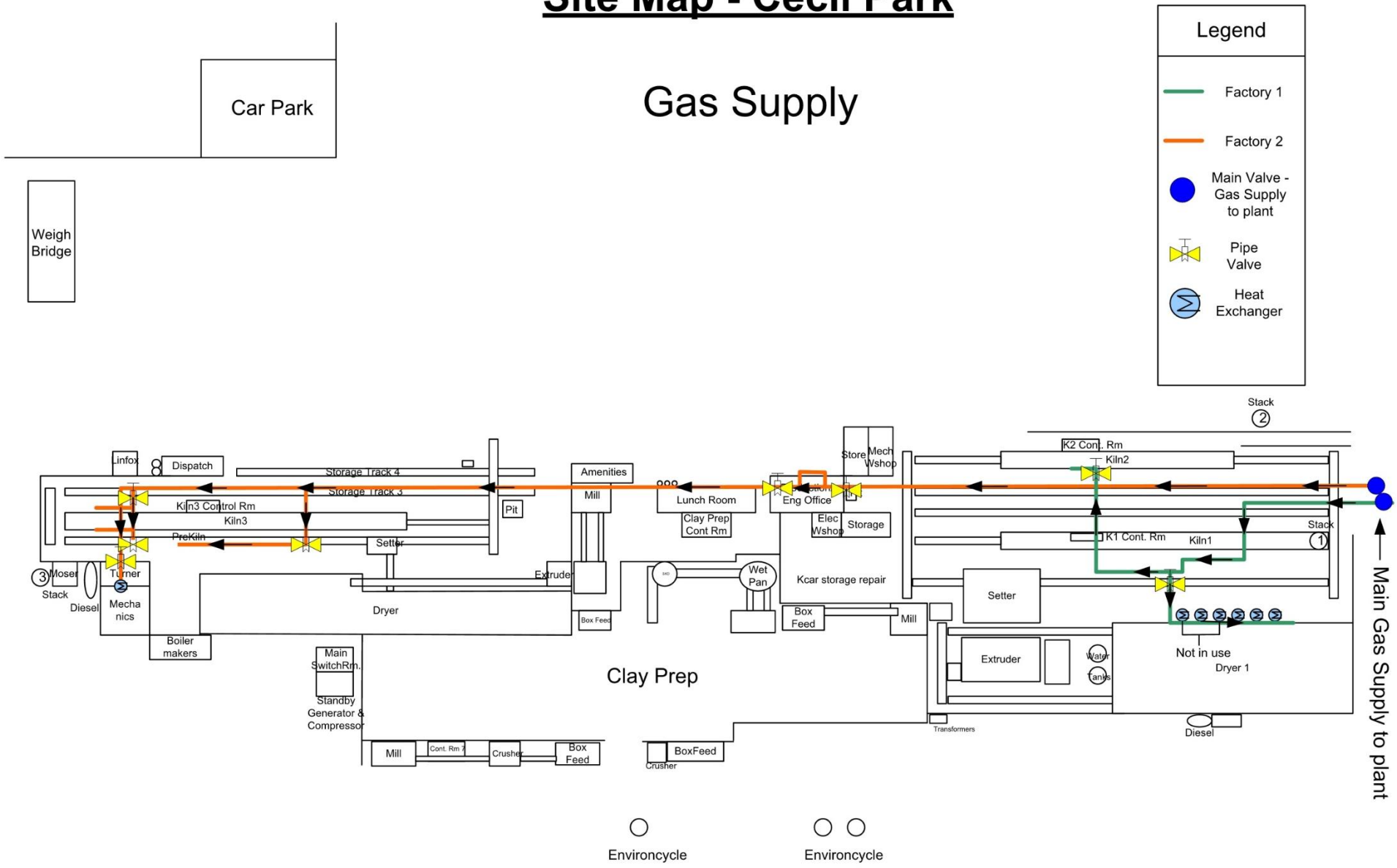
Refer to Visio files located in P:\Cecil Park Factory\SAFETY\SHE Management\SHE Documents\Visio Links • Site Location and Surrounding Area Map • BRK-CP-3.11-D13 Gas Supply Map • BRK-CP-4.1-D01 EPA Monitoring Points • BRK-CP-4.1-D05 Stormwater and Drainage System • BRK-CP-3.10.4.3-D01 Dangerous Goods Map

Site Location and Surrounding Area

SITE DISCHARGES ENTER EPHEMERAL CREEK



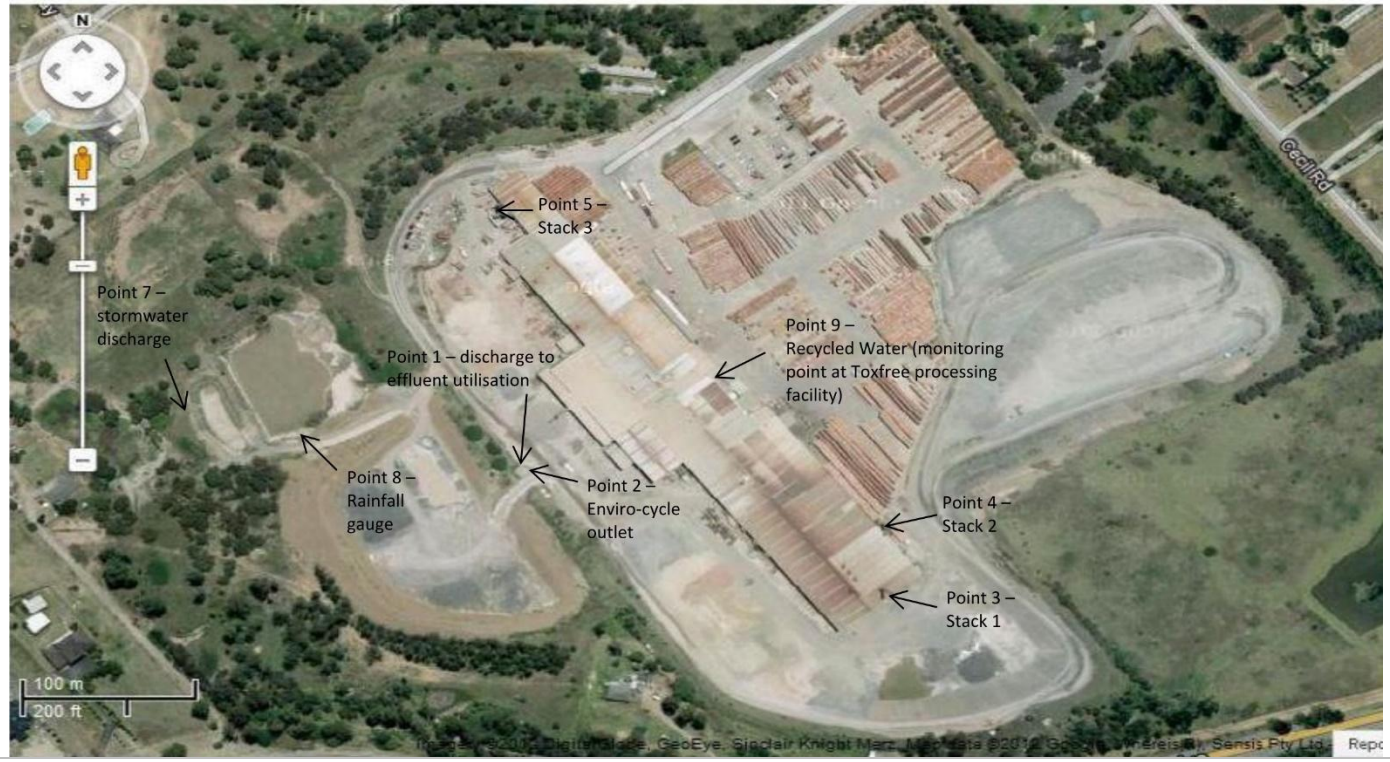
Site Map - Cecil Park



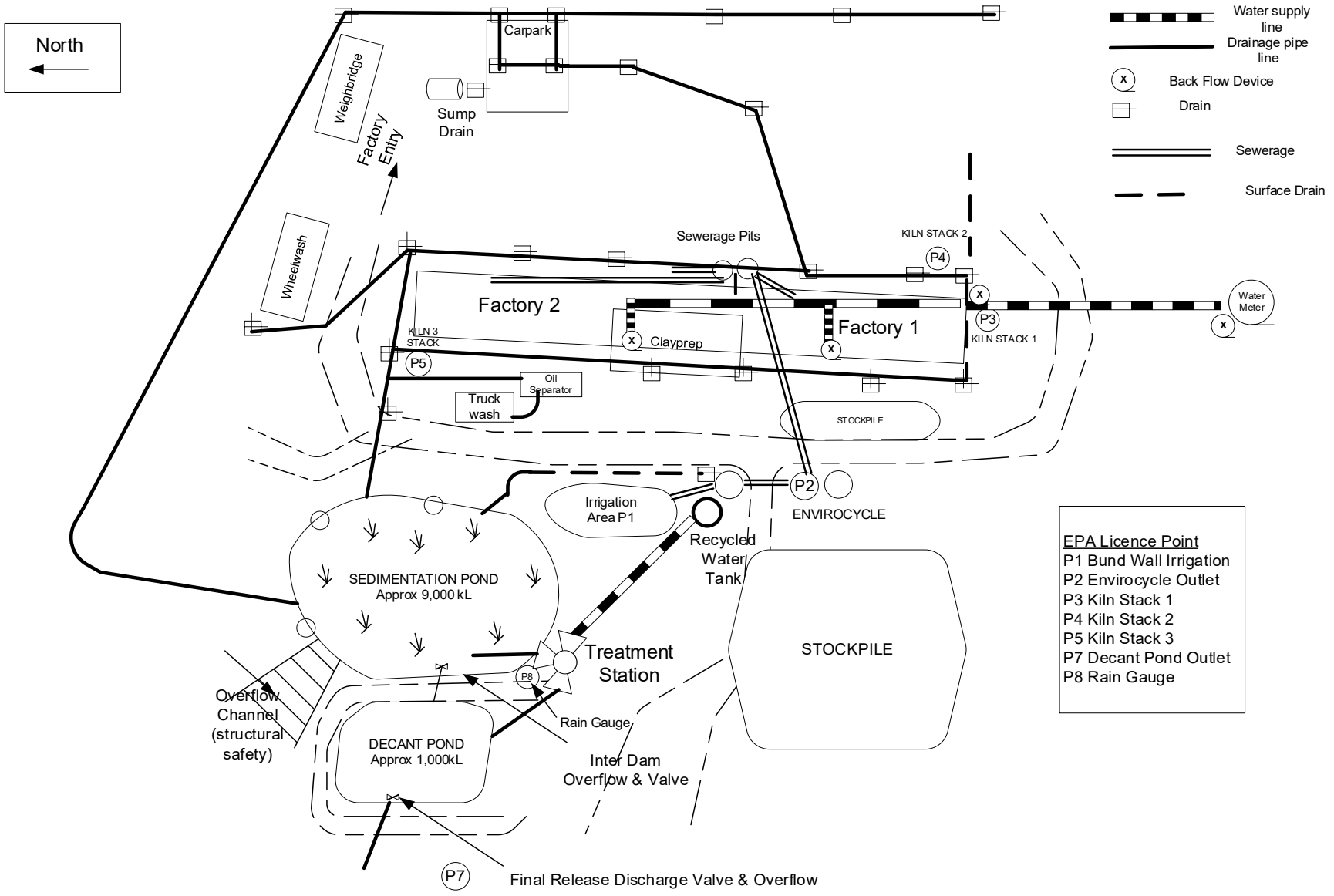
Gas Supply Map

Cecil Park - NSW EPA Licenced Discharge Points

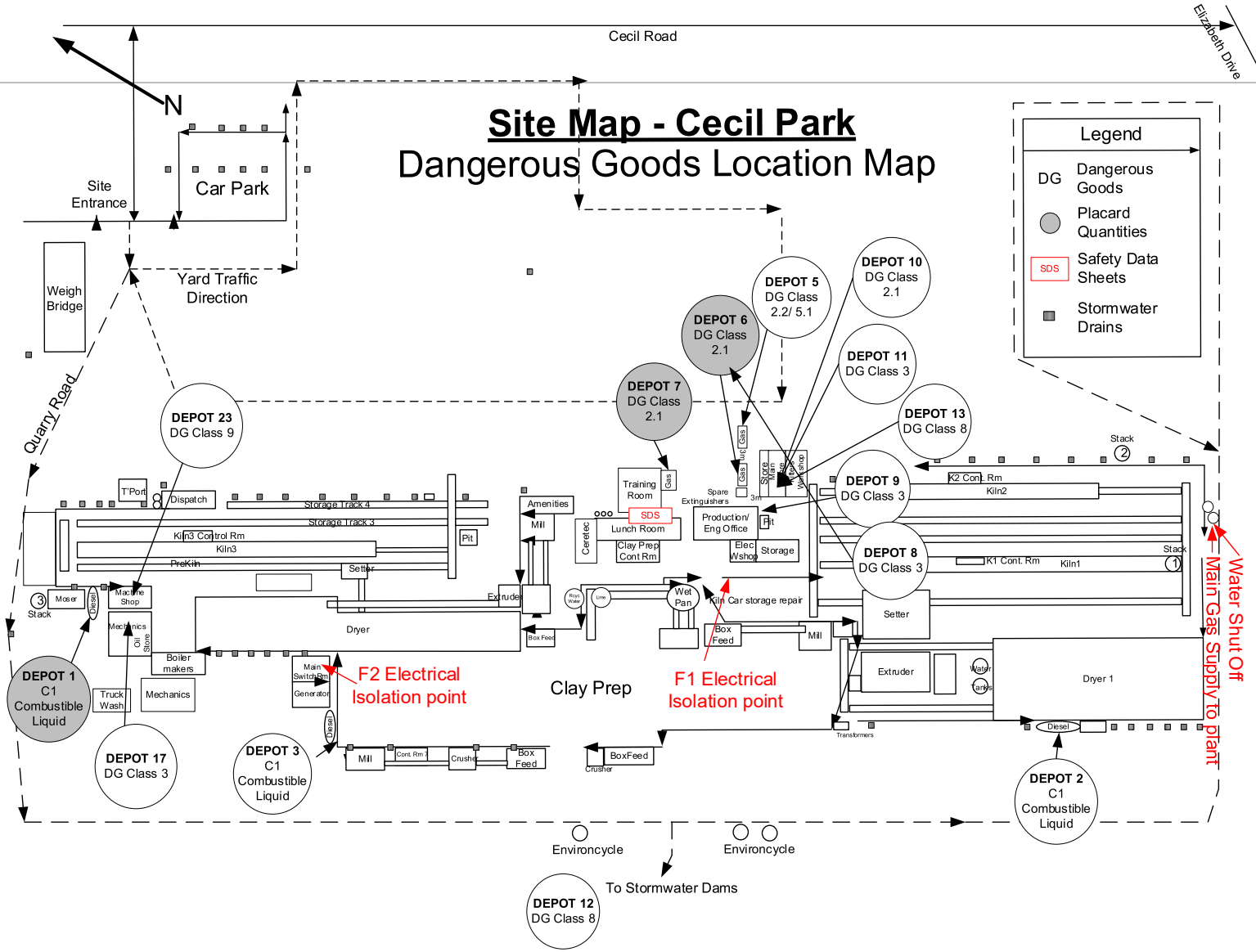
EPA Licence Number:	L1027
Licensee Name:	CSR Building Products Limited
Licensee Address:	Lot 7 Cecil Road, Cecil Park, NSW, 2178
Link to Licence:	http://www.environment.nsw.gov.au/prpoeoapp/ViewPOEOLicence.aspx?DOCID=28878&SYSUID=1&LICID=1027



Stormwater Drains and Pipes Map



Dangerous Goods Map



11 Surrounding Area Notification Process

The Cecil Park site will rely on letter box drops and door knock communication to provide early warnings and regular updates to all premises (including commercial, industrial, government, health care, educational and residential) within a 500m radius of the site of any potential harm from a pollution incident. These premises are included in the table above. The decision to provide early warnings will be made between the site and CSR Group Environment.

Who is notified depends on the type of pollution incident that has occurred at the site.

For the discharge of a pollutant to a stormwater system or creek, the premises that are adjacent to the stormwater system or creek and any downstream users will be notified.

For an unplanned release of an air pollutant into the atmosphere, the premises that are affected will depend on the type of pollutant, the prevailing winds, height and magnitude of an emission, the likelihood of the pollutant reaching ground level, and the possible impacts on sensitive receptors. The premises that are likely to be notified will be those within a 500m radius of the site.

During the notification, CSR will provide the facts of the incident and what actions are currently being undertaken by the site and any other emergency response agency (if any) and any specific information that could be provided to the community so it can minimise the risk of harm. For example, this could include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water in creeks or rivers affected or likely to be affected, by a pollutant discharge). The content of any letter box drop will be subject to approval from Group Environment and the GM Investor Relation & Corporate Communications.

12 Plan Testing and Update Register

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. Testing will cover all components of the PIRMP, including the effectiveness of training against the following scope and actions:

- Include PIRMP Response Team and Managers
- Response to simulated pollution incident associated with activities, equipment and materials associated with site operations (under rain / dry / windy conditions)
- Communication and notification with Site Managers, Authorities and neighbours / communities
- Level of availability, awareness, efficiency, and effectiveness in the use of incident reponse resources,
- Onsite coordination with external response services / Authorities – pending incident severity
- Minimising harm to people onsite – will simulated incident require site warning alarm / evacuation?
- Combating / minimising the pollution caused by the incident
- Discuss inspection, maintenance and replenishment of response equipment / materials used in responding to the incident
- Discuss clean up and disposal of contaminated response materials through licensed contractor
- Review PIRMP to reflect any learnings from simulated PIRMP test
- Schedule next PIRMP test

The frequency of training will be at least annually for the PIRMP response team and Site Manager. 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.

PIRMP training will be conducted through either formal awareness sessions, inductions, toolbox style presentations or simulated incidents.The site will utilize the two usual methods of testing:

- Desktop exercise or scenario - Any desktop exercise would include working through an incident scenario to ensure the PIRMP is effective, and
- Practical exercises or drills.

A summary report will be prepared for each PIRMP test that will detail results and learnings against the scope and actions presented in the Table below.

The objective of the training will be to ensure the Site Manager, incident response team and 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.

Date	Test / Training	Scope	Status
20/09/2016	Test	Desktop simulated spill to site dam (see ECS report)	Complete
20/09/2016	Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
12/12/2017	Test/Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
16/10/2018	Test/Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
22/10/2020	Test/Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
29/10/2021	Test/Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
10/02/2023	Test / Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
Dec 2023	Test / Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
Aug 2024	Test / Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
May 2025	Test / Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	Complete
May 2026	Test / Training	PIRMP POEO Act / Regulation Requirements (see ECS report)	To be scheduled

13 Other Attachments

Clay Stockpile Area Dust Trigger Response Plan

A trigger response plan is designed to ensure potential dust impacts from site activities are minimised by monitoring atmospheric conditions and implementing management measures as required. This includes consideration of meteorology forecasts and observations to enable appropriate control measures to be taken.

Table 1 – Trigger Description

Trigger	Description
Normal State	Reasonable conditions in day-to-day operation
Level 1	Change from normal indicating a potential risk (not of serious nature, but acts as an alert and requires monitoring to detect further trends)
Level 2	Moderate risk of dust related impacts occurring. Remedial actions required.
Level 3	High risk of dust related impacts occurring. Immediate actions required.

For each trigger, a corresponding response or series of responses is required. Refer to Table 2.

Table 2 – Trigger Action Response Plan

Trigger	Trigger Description	Response
Normal State	WEATHER FORECAST ▪ Light winds (less than 25km/h) SITE OBSERVATION ▪ Light to moderate winds ▪ No dust leaving site	▪ Monitor conditions ▪ Maintain dust depression activities
Level 1	WEATHER FORECAST ▪ Moderate winds (25 to 35km/h) ▪ Less than 50% chance of rain SITE OBSERVATION ▪ Fresh winds, and ▪ No rain in past 24 hours ▪ Dust has potential to leave site	▪ Communicate change of observed conditions with NSW Raw Materials Manager NSW Raw Materials Manager to; ▪ Identify the activity(s) acting as the source of the dust and implement appropriate controls ▪ Continue to implement control strategies until conditions return to *Normal State*
Level 2	WEATHER FORECAST ▪ Strong winds (40 to 50km/h) ▪ Less than 90% chance of rain SITE OBSERVATION ▪ Strong winds ▪ No rain in past 12 hours, or ▪ Dust has the potential to leave site	NSW Raw Materials Manager to; ▪ Review daily activities ▪ Modify dust-generating non-essential activities ▪ Determine if additional longer-term controls are required at the source
Level 3	WEATHER FORECAST ▪ Strong to gale winds (over 50km/h) ▪ Less than 90% chance of rain SITE OBSERVATION ▪ Near gale winds ▪ No rain in past 6 hours, or ▪ Dust is leaving site	Stop Clay Stockpile activities until such time that wind conditions change.

14. Key PIRMP Definitions

The following definition provide an understanding of three key terms that the EPA generally reference in relation to when a PIRMP is 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.