



PIRMP - POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

July 2024



1. INTRODUCTION

1.1 GENERAL

Rocky Hill Recycled Sand & Soil Pty Limited – RHRSS has to prepare a Pollution Incident Response Management Plan (PIRMP) to ensure compliance with current NSW environmental legislation administered by NSW Environment Protection Authority (EPA).

Changes to the *Protection of the Environment Operations Act, 1997* (the POEO Act) came into force on 29 February 2012. The requirement under Part 5.7A of the POEO Act imposes an obligation on holders of Environment Protection Licences (EPL) to prepare and implement a PIRMP for each licensed activity.

Offences associated with not preparing the plans or keeping plans at the premises, not testing a plan in accordance with the regulation and not implementing a plan when an incident occurs, apply.

RHRSS operates a “landscaping material supplies” company from its site at 27 Hetherington Street, Goulburn, New South Wales (site) which is also known as “Rocky Hill Sand & Soil”. The activities have been undertaken on that site for nearly 50 years; however, DENRITH PTY. LTD. Trading as Divall's Earthmoving & Bulk Haulage purchased the business approximately 1 year ago. As part of its activities, it is necessary to store landscaping and civil works related materials within this site. The original business was established in the nineteen sixties and seventies with relevant planning approvals obtained from Goulburn Mulwaree Council (Council) at that time. It appears that at that time, the land zoning was called “**Non-Urban**” and that the classification of activities was different to what it is now, however the intention of the activities was the same as implied. Based on Council files and several inspections by authorised Council officers over the years including the last seven (8) years, Council officers have indicated that the activities undertaken on site are in compliance with existing approvals and conducted in a satisfactory, proper and efficient manner. RHRSS has applied for and obtained an EPL under the POEO Act for the activities conducted on that site since the quantities of materials stored there may on occasions exceed the newly introduced thresholds which require a licence. Previously RHRSS did not have an obligation to apply for and obtain an EPL until after the new changes to the legislation took effect as stated above. RHRSS has taken the initiative in applying to the EPA early to ensure that its activities are operated within current NSW legislation and EPA’s requirements. Therefore, RHRSS has an obligation to prepare a PIRMP under the POEO Act and submit it to the EPA as soon as it is practical after obtaining the EPL. The PIRMP will cover the activities included under the EPL. A copy of EPL 20724 is included in **Attachment 4**.

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1.2 REFERENCE DOCUMENTS

This Plan has been developed in accordance with the following guidance documents and relevant Australian/New Zealand Standards:

- *Hazardous Industry Planning Advisory Paper (HIPAP) No.1 – Emergency Planning* (NSW Department Planning) January 2011;
- *Work Health and Safety Act 2011* and relevant *Regulations* (NSW Legislation);
- SAA/SNZ HB76:2004 *Dangerous Goods - Initial Emergency Response Guide* (Standards Australia) 2004;
- AS 3745-2010 *Planning for emergencies in facilities* (Standards Australia);
- NSW Fire & Rescue Guidelines;
- *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* (NSW Legislation);
- *Protection of the Environment Operations Act, 1997* (NSW Legislation); and
- *Environmental Guidelines: Preparation of Pollution Incident Response Management Plans* (NSW EPA).

1.3 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

The objectives of the PIRMP are threefold:

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

Requirements for pollution incident response management plans are stipulated in the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* and Part 5.7A of the POEO Act. Part 5.7A of the POEO Act specifies:

- Information to be included in the plan (Clause 153C) including the procedures to be followed in notifying a pollution incident to the relevant people and authorities, a detailed description of action to be taken immediately after a pollution incident to reduce or control any pollution and procedures to be followed;
- The plan must be kept at the premises to which the relevant environment protection licence (EPL) relates (Clause 153D);

- Licensees must test the plan in accordance with Clause 98E of the Regulation (Clause 153E); and
- Licensees must immediately implement the plan if a pollution incident occurs in the course of an activity so that material harm to the environment is caused (Clause 153F).

Information in the plan that must be made publicly available includes:

- Procedures for contacting relevant regulatory authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
- Procedures for communicating with the community.

This information will be made readily available as follows:

- At the site where the activities are carried out; and
- On the company's website, if available.

Any personal information in the plan within the meaning of the *Privacy and Personal Information Protection Act 1998* may be excluded from public exhibition.

1.4 DEFINITION OF A POLLUTION INCIDENT

The *Environmental Guidelines: Preparation of pollution incident response management plans* (NSW EPA) defines a pollution incident as:

“...an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

Under the Section 148 of the POEO Act, pollution incidents causing or threatening material harm to the environment must be notified immediately to the relevant authorities.

“Material risk of harm to the environment” is defined under Section 147 of the POEO Act as:

(a) *harm to the environment is material if:*

- (iii) *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*
- (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.*

The following section provides an explanation of RHRSS’s obligations under the legislation relating to the management of pollution incidents.

1.5 POEO (GENERAL) AMENDMENT (POLLUTION INCIDENT RESPONSE MANAGEMENT PLANS) REGULATION 2012

The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012 specifies matters to be included in pollution incident response management plans.

The NSW EPA has also prepared “*Environmental Guidelines: Preparation of Pollution Incident Response Management Plans*”. This PIRMP has been prepared in accordance with the POEO Act, Regulation and the guidelines. Requirements included are:

- A description and likelihood of hazards to human health and the environment associated with the licensed activity;
- Pre-emptive actions to be taken to minimize risk of harm;
- An inventory of potential pollutants;
- A description of safety equipment and devices used to minimize risks and/or contain a pollution incident;
- 24-hour details of key site contacts and relevant authorities;
- Mechanisms used to provide early warnings to neighbours and the local community;
- Actions to minimize risk of harm should an incident occur;
- Actions to be taken during or immediately following a pollution incident;
- A detailed set of plans; and
- Staff training programs relating to implementing the plan.

Reference to existing Work Health and Safety Management Plan has been made throughout.

1.6 WHO ARE THE RHRSS?



1.6.1 General

Rocky Hill Recycled Sand and Soil Pty Ltd is the current operators of the Rocky Hill Sand and Soil with an ABN 34 646 496 666. Based on information obtained from the applicant and Council files, the applicant is relatively new on this site. However, the applicant has been directly and indirectly involved in handling similar materials for over thirty (30) years and has been undertaken some small and medium civil works related projects mainly within the Goulburn Mulwaree Council area during that period. RHRSS's details are provided below.

Physical address:	27 Hetherington Street, Goulburn NSW 2580
Current applicant contact details:	
Phone:	(02) 4821 4219
Email:	accounts@rhrss.com.au
Grid reference:	750946E and 6151083N (Middle of site) 750760E and 6151124N (Street address)
Zone:	55
Elevation:	642-650 m
Local Government Area:	Goulburn Mulwaree Council
Land Use Zoning:	B6 – Enterprise Corridor (previously Non-Urban)

1.6.2 Key Personnel and their Roles and Responsibilities

RHRSS Management, key staff and regular contractors are responsible for understanding and implementing this PIRMP as appropriately identified. The PIRMP identifies the general roles and responsibilities of RHRSS employees. In addition, where permanent or regular contractors are engaged to work at the RHRSS site they shall manage any pollution incidents in accordance with this PIRMP.

RHRSS Managers and Supervisors are responsible for ensuring that their staff are aware of the PIRMP and their roles where appropriate. They are also responsible for the training of their staff.

The RHRSS senior management team is responsible for:

- Assisting with advice, reporting and response process;
- Ensuring the plan is made available to staff responsible for implementing the plan and authorized officers under the POEO ACT;
- Giving advice onto whether environmental incidents need to be reported to external agencies;
- Assisting in the notification of pollution incidents to the relevant authorities;
- Provision of maps associated with the plan;

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- Assistance with implementation of response actions to pollution incidents;
- Assistance in communicating with neighbours and the local community about the plan and when incidents of a certain nature occur;
- Ensuring the training of those responsible for activating the plan;
- Testing; and
- Reviewing this plan.

1.7 LICENSED ACTIVITIES

In addition to the Landscaping Material Supplies facility, RHRSS’s activities on this site are classified as scheduled activities under the Protection of the Environment Operations Act 1997 being Resource Recovery, Waste Processing (non-thermal treatment) and Waste Storage activities which are now included in the EPL. RHRSS (trading as Rocky Hill Sand & Soil) is located in the middle of a Rural Residential and commercial area (**Zone B6 – Enterprise Corridor**) where a large variety of approved activities are undertaken in accordance with Council requirements and planning instruments/plans. Notwithstanding the above and due mainly to the fact that some of RHRSS’s activities were determined to be existing use and others continuous use, both Council and the EPA determined that RHRSS can continue to operate these activities provided that certain conditions are complied with. If these conditions are likely to be contravened for any reason, further approvals and possible assessments could be required.

Therefore and due to the fact that the quantities of materials stored on site could potentially be over 2,000 tonnes at any time, it was determined by the applicant and subsequently confirmed by the EPA that it is more appropriate to apply to and obtain from the EPA an Environment Protection Licence (EPL) to ensure that its activities are operated in accordance with current environmental legislation. This process was completed last year and the EPL includes premises-based scheduled activities listed in **Table 1-2**. A copy of RHRSS’s EPL No 20724 is included in **Attachment 4**.

Table 1-2: Licensed Activities

Scheduled Activity	Fee Based Activity	Scale
Resource Recovery	Recovery of General Waste	>0 T recovered
Waste Storage	Waste storage – other types of waste	>0 T stored
Waste Processing (non-thermal treatment)	Non-thermal treatment of general waste	>0 T processed



The following sub-sections briefly describe the activities undertaken at the site.

1.8 DETAILS OF ACTIVITIES CONDUCTED ON SITE

Currently the site is used for the receipt, sorting and recycling within the existing active working area of waste materials including building, construction, demolition, excavation, concrete, metal, wood and other similar materials. It is noted though that most of these materials are partially sorted and are received from within the Goulburn Mulwaree local Government area only.

The site is also used for the receipt and storage of already recycled and processed materials for use in the building, construction and infrastructure industry. Some of these materials are listed below. Some of these finished products are received on site in bulk form from Sydney such as sand and mushroom compost. These finished products are then sold to clients in retail form.

The majority of activities undertaken by RHRSS are the supplying of recycled and natural materials to individuals, government and non-government organisations for landscaping, agriculture and civil works. These include: gardens, extensive agricultures, professional and non-professional landscaping organisations, roads, pavements, footpaths, stormwater systems, drainage, driveways, car parks and other related works.

No liquid waste, as classified in accordance with the EPA's waste classification guidelines, is received on site.

No composting activities, as classified in accordance with the EPA's waste classification guidelines, are conducted on site.

Similarly, no hazardous or restricted solid wastes, as classified in accordance with the EPA's waste classification guidelines, are received on site.

For the finished products, trucks unload the products into the relevant storage bay dedicated for that finished product.

For the non-finished products, as soon as the materials are received on site, the covers are removed from the truck/trailer/skip and materials are unloaded at the rear of the active working area. Using a normal front end loader and RHRSS employees, the materials are partially sorted by removing bulky objects and other materials that can be easily removed from the stockpiled materials. These materials are sorted into recyclable and non-recyclable materials. The recyclable materials are then divided into smaller stockpiles depending of the materials (metals, timber, concrete, soil, etc...). The materials that cannot be recycled by RHRSS machinery are transported to lawfully licensed recycling facilities for further recycling and the remaining materials are recycled by RHRSS. In relation to the non-recyclable materials, they are transported to appropriately licensed disposal facilities (normally Council landfill).

Crushing and screening works are undertaken on site on a few occasions every year using mobile equipment as required depending of the materials received and the clients'

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requirements. The crushing and screening processes have never exceeded 500 tonnes at any one time and never exceeded 5,000 tonnes per year, simply because the majority of materials received on site are finished products that have already been processed elsewhere by appropriately licensed facilities in accordance with EPA requirements and relevant Australian Standards.

Again, on occasion some clients may request different mixes of finished products to suit their particular jobs or to suit the characteristics of the soil where landscaping work is undertaken. This does not change the chemical characteristics of sand, soil or mushroom since it is a quick mix of two (2) or more finished products together.

The process is a 100% dry one so there is no wastewater generated on site as a result of processing of waste materials. In addition, there is no thermal treatment of the waste on the site at any stage of the process. There are no furnaces or other heat generating equipment required as part of these activities at the site.

The active working area outside the old workshop building is normally used for the storage of empty trucks, trailers, crusher, screener, car parking and vehicle maneuvering. Minor and Major maintenance and service of machinery are undertaken within the Divall's Workshop out of RHRSS.

The active working area is approximately 58 % of the total site area. The majority of this area is made of partially impervious materials to assist in surface water management and reduction of dust generation. The non-impervious areas are mainly at the rear and northern sections of the property adjacent to the water hole and unnamed stream. These sections are not in use for any purpose associated with the materials recycling activities. It appears that these sections are somehow segregated from the active working area to assist in better management of surface water, waste and dust minimization.

1.8.1 Finished Goods

Most of the finished products that are generated from the scheduled activities are chemically and physically identical to the materials used prior to being received on site with the difference in that the materials are now sorted into two main streams; recyclables and non- recyclables. The non-recyclables are transported directly to licensed disposal waste facilities whilst the recyclable materials including ferrous and non-ferrous materials, paper/cardboard, glass, wood, plastics, etc... are transported to other waste recycling facilities for further processing. However, all other recyclables such as soil, concrete, etc.... are sorted into several stockpiles in accordance with their final uses. A small percentage of the finished products are simply crushed and screened to size. In addition to the above, on some occasions, some clients may request a mixture of for example sand and soil (30/70). This can be accommodated as it does not alter the chemical characteristics of the finished product; it is simply a mixture of sand

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and soil.

Most of the materials received on site are transported off site to their required destinations without any alteration by either the client or RHRSS employees. Finished goods are chemically identical to the raw materials used prior to processing with the difference in that the materials are now sorted into two main streams; recyclables and non-recyclables. The non-recyclables are transported directly to licensed disposal waste facilities whilst the recyclable materials including ferrous and non-ferrous materials, paper/cardboard, glass, wood, plastics, etc... are transported to other waste recycling facilities for further processing.

The finished products stored on site include but are not limited to the following materials:

- 20 mm Aggregate
- Eco Soil
- Garden Blend
- Menangle soil
- Cow Manure
- Mushroom Compost
- Soil Conditioner
- Heavy Mulch
- Bush Mulch
- Euci Mulch
- 20 mm River Stone
- Sydney Sand
- Yellow Brickie Sand
- White Brickie Sand
- Crusher Dust
- 40 mm Sunset Pebble
- 20 mm Sunset Pebble
- 10 mm Sunset Pebble

1.9 ENVIRONMENTAL MANAGEMENT SYSTEM

RHRSS has commenced establishing an Environmental Management System (EMS) that will include amongst other things regular inspections of its entire site including its perimeter to ensure that all mitigation measures are fully implemented on site especially those that are associated with dust generation and water pollution, and are maintained in an efficient and

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proper manner.

Furthermore, RHRSS takes all environmental aspects of all its activities seriously and works effectively and efficiently to ensure that all environmental aspects associated with their machinery are considered before any activities commence on site. RHRSS has a hard working team that monitors environmental components on site sometimes on a weekly basis.

1.9.1 Environmental Policy

RHRSS has recently updated its Environmental Policy following the recent changes to the environmental legislation. A copy of RHRSS’s Environmental Policy is included in **Attachment 5**.

1.9.2 Work Health and Safety Commitment Statement

RHRSS has recently updated its Work Health and Safety commitment Statement to comply with current WH&S requirements to meet the requirements of the Department of Health, WorkCover Authority, Council and other Government Authorities.

A copy of RHRSS’s updated Work Health and Safety Commitment Statement is included in **Attachment 5**.

Hardcopies are available at relevant locations and in offices around the site. Electronic copies are maintained on the system and made available as required.

This PIRMP has been prepared so that it is easily integrated into the EMS. At the time of writing, the PIRMP had been prepared to cover the activities under the existing EPL. This document has the same focus. The PIRMP can also be read as a standalone document as references to relevant manuals, procedures and work instructions have been provided throughout.

The list of plans is a dynamic one and will be updated by the proponent following the introduction of any additional activities, expansion of existing activities or even changes to existing activities since at this stage it is unknown what additional documents the authorities may require.

Furthermore, RHRSS takes all environmental aspects of all projects seriously and works effectively and efficiently to ensure that all potential environmental issues are considered before any works commence on site. RHRSS has a hard-working team that monitors environmental components on site and on its other civil works related sites on a weekly and sometimes daily basis as well depending of the specifics of each project. The use of external

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environmental consultants also allows RHRSS to have detailed environmental management plans created and edited when required for the duration of the project. RHRSS's EMS allows for constant on site and in office audits and reviews.

To give the reader a better understanding of the potential impact on the surrounding environment, **Figure 1-1** shows the location of the site in the Regional context and **Figure 1-2** shows the location of the site in the local context with LOTs and DPs. Figure 1-2 shows the RHRSS site with surrounding areas.

Figure 1-1: Location of the Site in the Regional Context

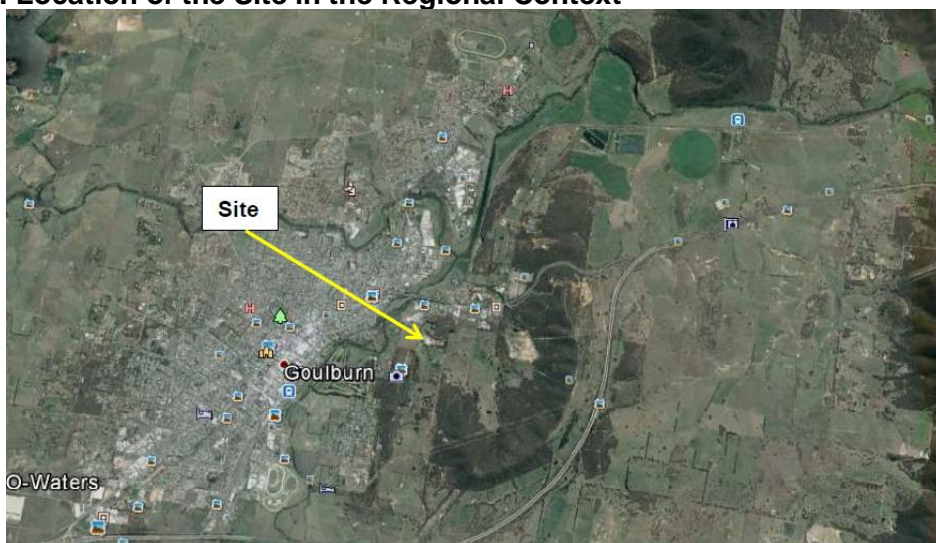


Figure 1-2: Site Location in the Local Context including Lots and DPs

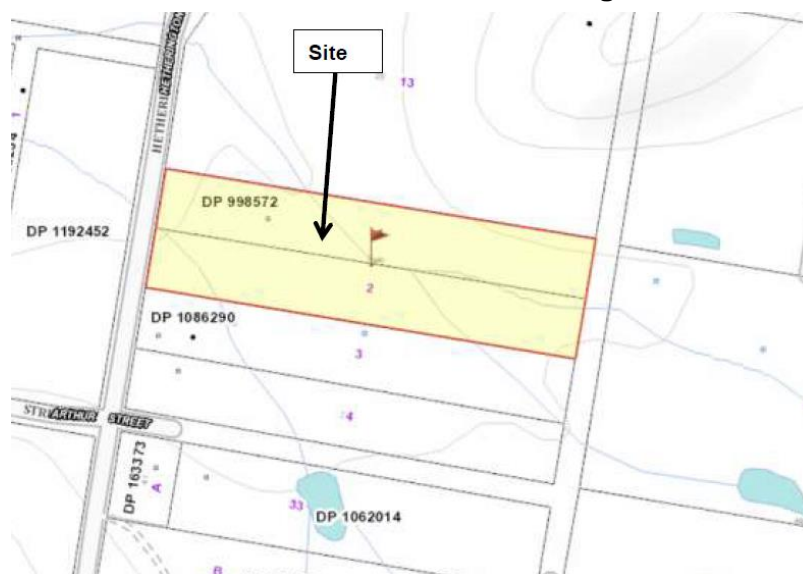


Figure 1-3: Aerial View of the RHRSS Site including Surrounding Areas – Closer View



2. HAZARDS AND RISKS

2.1 INVENTORY OF POTENTIAL POLLUTANTS

Table 2-1 lists the potential pollutants on the site, their location, source and approximate quantity if relevant.

Table 2-1: Potential Pollutants

Potential Pollutant	Source/s	Location	Approximate Quantity
Liquid Chemicals	Diesel Tank	Spills of liquid chemicals inside the bund or building	insignificant
Non-clean Water	Heavy rain	Working area outside the building	Unknown
Dust	Waste Processing/ Stockpiles	Working area	Unknown

Detailed maps are included in **Attachment 3** which includes also a comprehensive site layout that shows the locations of all features of the plant including locations of the different processes where the above pollutants are likely to be generated.

The negligible quantities of materials classified as dangerous goods are stored in a dedicated area in the workshop which is away from the main active working area.

2.2 HAZARDS TO HUMAN HEALTH AND THE ENVIRONMENT

The main hazards associated with the activities at the site include:

2.2.1 Spills

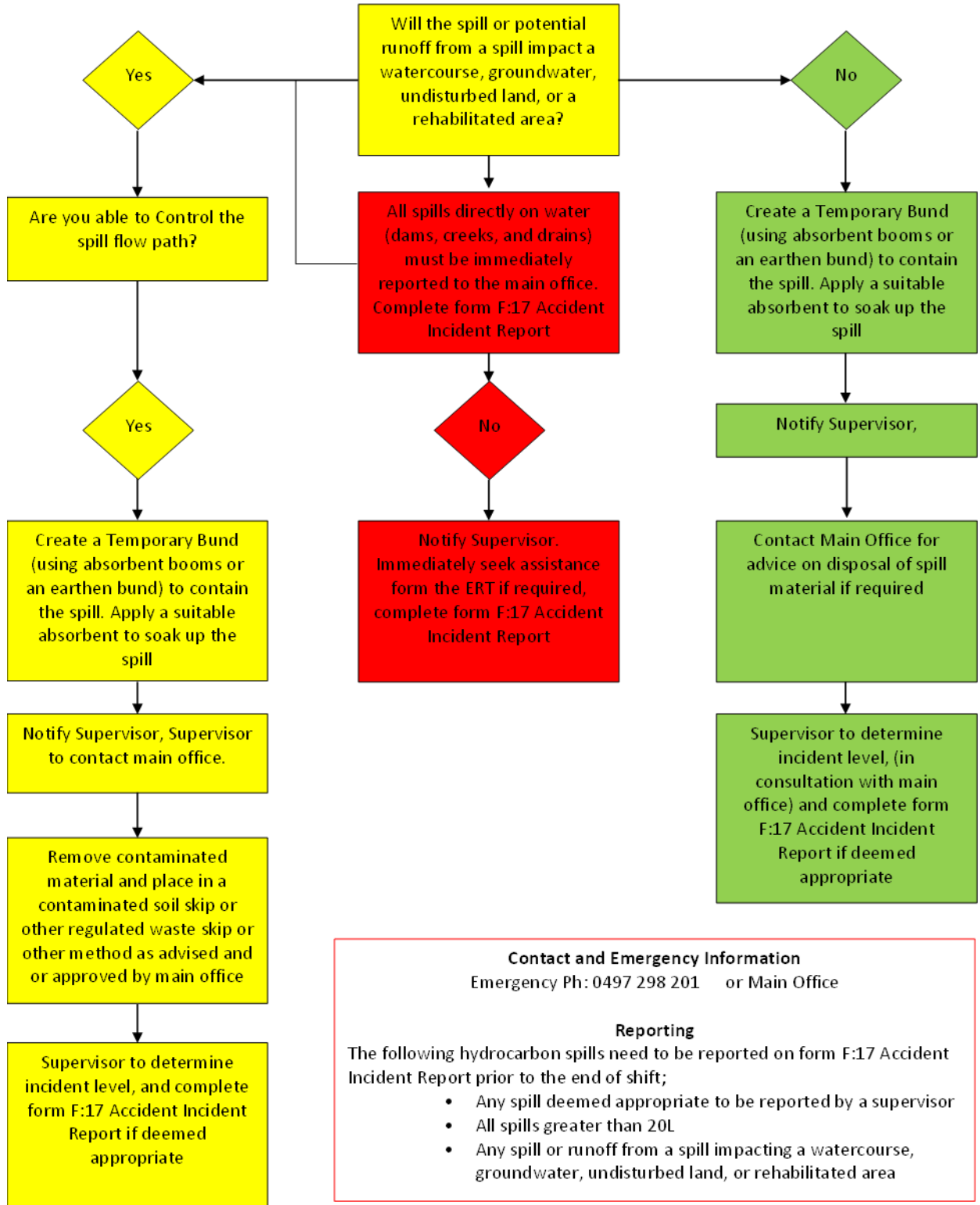
- Spills of liquid chemicals including fuel from vehicles could occur during delivery of incoming loads or through damaged equipment. This could lead to the pollution of nearest waterways. This presents a very low risk due to the currently implemented water pollution mitigation measures as well as the fact that the diesel tank is under cover and fully bunded and ,

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- Spills can cause stormwater contamination if not mitigated. Stormwater impacts could cause introduction of pollutants into waterways, which could potentially cause some ecological impacts.

Substance	Concrete	Soil	Water, Undisturbed Or Rehabilitated Land
Hydrocarbon (diesel, lubricating oil, Hydraulic oil, kerosene etc.	All	All	Spills must be reported on form F:17 Accident Incident Report and to the Main Office
	20L	20L	
	Emergency Called	Emergency Called	
Chemical spills- Solvents-acid or alkali, flammable or non-flammable coolants etc.	All	All	Spills must be reported on form F:17 Accident Incident Report and to the Main Office.
	20L	20L	
	Emergency Called	Emergency Called	
Report spill to supervisor. Supervisor to assess Accident Incident and report details of spill if they elect to do so	Report spill to supervisor. Incident reported on form F:17 Accident Incident Report, Main Office Informed	Emergency Response Team (ERT) contacted to coordinate clean-up. Incident must be reported on form F:17 Accident Incident Report. Main Office must be notified immediately	

2.2.1.1. Hydrocarbon Spill Response Flow Chart



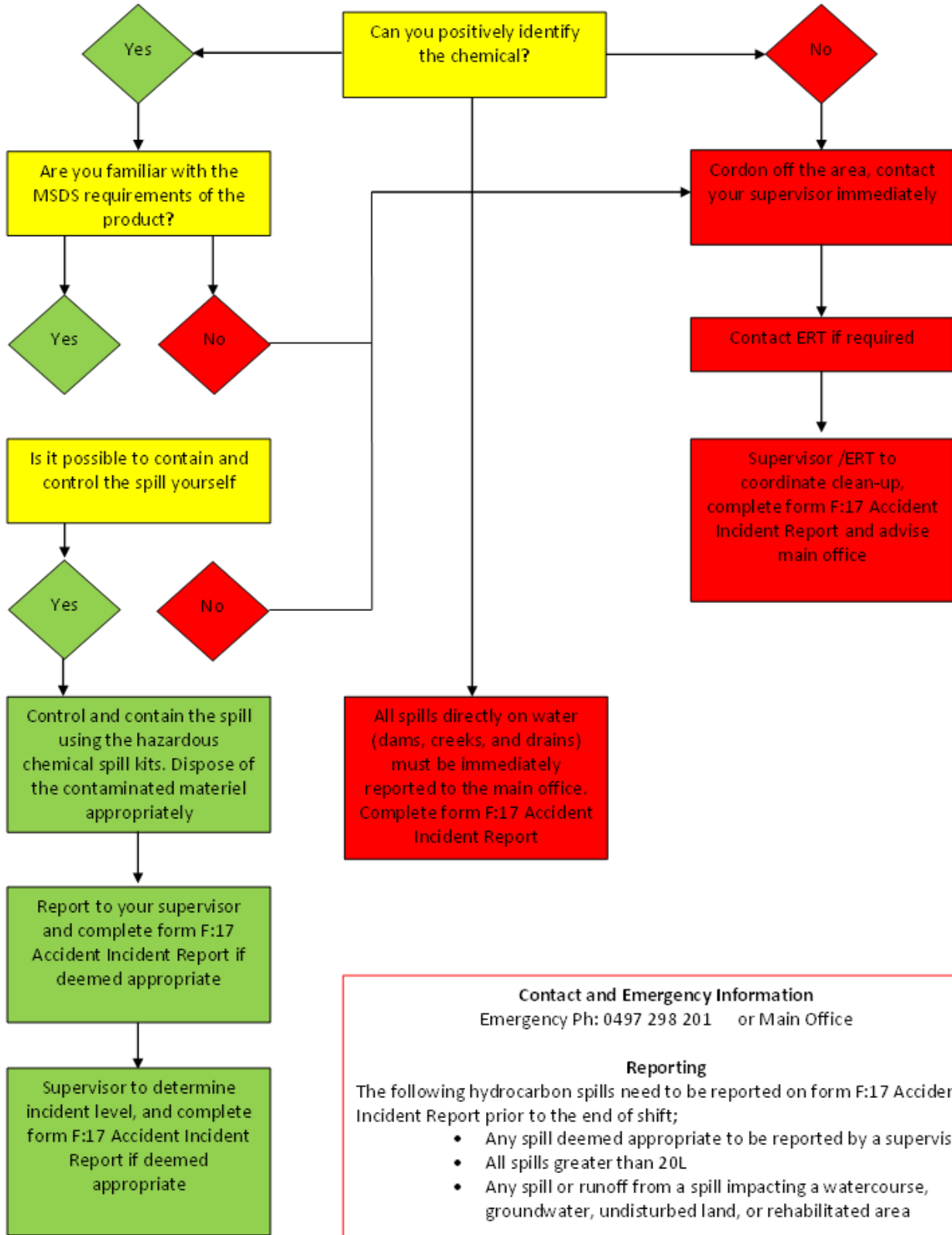
Contact and Emergency Information
Emergency Ph: 0497 298 201 or Main Office

Reporting

The following hydrocarbon spills need to be reported on form F:17 Accident Incident Report prior to the end of shift;

- Any spill deemed appropriate to be reported by a supervisor
- All spills greater than 20L
- Any spill or runoff from a spill impacting a watercourse, groundwater, undisturbed land, or rehabilitated area

3.2.1.2. Chemical Spill Response Flow Chart



Contact and Emergency Information
Emergency Ph: 0497 298 201 or Main Office

Reporting

The following hydrocarbon spills need to be reported on form F:17 Accident Incident Report prior to the end of shift;

- Any spill deemed appropriate to be reported by a supervisor
- All spills greater than 20L
- Any spill or runoff from a spill impacting a watercourse, groundwater, undisturbed land, or rehabilitated area

2.2.2 Fires

- The risk of fire is associated with the generation of fumes or sparks and the combustible materials which may ignite accidentally during activities. Smoking (if procedures on site are not followed with regards to a ban on smoking) can also initiate a fire on site,
- Fire can cause high releases of toxic combustion products from the site, if not mitigated. If the atmospheric/weather condition does not allow dispersion of fire combustion emissions, then it is possible for these emission clouds to be brought down to ground level and cause potential health effects to the nearest premises occupied by persons. Stormwater contamination is also a possibility if fire-fighting water is not contained through the use of appropriate controls and procedures.

2.2.3 Explosions

- Explosions can cause physical impact to persons affected by the shockwave released from this event. The severity of the shockwave is dependent upon the amount of materials involved in causing the explosion.

2.2.4 Non-clean water

- Non-clean water could be generated for a very short period of time during heavy rainfall, if the working area is not free of dust or if materials are stockpiled outside the bunded areas,
- Non-clean water could also be generated from dirty truck wheels while entering and/or leaving the site during rain events,
- Non-clean water in large quantities could pollute waters if it is not captured and/or treated prior to leaving the site.

2.2.5 Dust

- The risk of dust generation on site is mainly related to the waste processing, stockpiling, crushing and screening activities. If the dust minimization measures are not implemented on site by the occupier, dust may cause health problems for people including employees and visitors. Dust is unlikely to cause any health impact on residents due to the distances from the dust generating activities to these residents. All dust is minimized by using the water-cart, water hoses and water tank,
- Traffic within the external areas of site may also generate dust but this is a minor concern and should not pose a great impact on human health or the environment.

2.3 RISK ASSESSMENT

For the purposes of this plan, risk can be evaluated using the following three (3) tables:

HOW AN EVENT IS LIKELY TO OCCUR?

LIKELIHOOD

Level	Descriptor	Description
A	Almost Certain	The event is expected to occur in most circumstances.
B	Likely	The event will probably occur in most circumstances.
C	Possible	The event should occur at some time.
D	Unlikely	The event could occur at some time.
E	Rare	The event may occur only in exceptional circumstances.

IF IT DOES OCCUR, WHAT ARE THE WORST CASE SCENARIO CONSEQUENCES? CONSEQUENCES OR IMPACT

Level	Descriptor	Description
1	Insignificant	No injuries.
2	Minor	First Aid treatment.
3	Moderate	Medical treatment required.
4	Severe	Extensive injuries, loss of product capability.
5	Catastrophic	Death.

Use the information above to find risk level (i.e. Likelihood 'C', Consequence '3', would equal 'S' or Significant Risk).

Likelihood	LEVEL OF RISK				
	Consequence				
	Insignificant 1	Minor 2	Moderate 3	Severe 4	Catastrophic 5
A (almost certain)	S	S	H	H	H
B (likely)	M	S	S	H	H
C (possible)	L	M	S	H	H
D (unlikely)	L	L	M	S	H
E (rare)	L	L	M	S	S

LEGEND: H = High Risk, S = Significant Risk, M = Moderate Risk, L = Low Risk.

Table 2-2 provides a risk assessment of the potential hazards that could occur at the site using the above figure. The level of risk is relevant if the controls are not in place. This highlights the importance of the control measures and that site management ensure these are applied and in working order.



Table 2-2: Hazard and Likelihood Risk Assessment, and Control Measures

Site Name: Rocky Hill Sand and Soil Pty Ltd				Responsible person: Site Manager		Date: Oct/2023
Hazard/ Incident	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Risk	Control Measures / Corrective Action	
Spills	Spills of chemicals including fuel could occur: <ul style="list-style-type: none"> • During the receipt, transfer, and other normal activities; • As a result of damaged equipment. 	Minor	Unlikely	LOW	Bunding and roofing of all chemical storage areas, as well as the workshop area, Hazchem Spill kits are provided at high risk locations, Emergency Response Procedures. Spills Procedure, Regular site inspections/audits and good housekeeping procedures. Installation of oil/water separator in a strategic location.	
Fires	Risk of a fire occurring on site is a result of: <ul style="list-style-type: none"> • Improper use or storage of any fuels kept on site; 	Moderate	Unlikely	MEDIUM	Depending on the nature of the odd jobs that are undertaken, a number of potential hazards may result that may include fires. Immediate action needs to be taken to segregate and contain the materials that are the cause of that potential, away from the processing areas.	



Site Name: Rocky Hill Sand and Soil Pty Ltd				Responsible person: Site Manager		Date: Oct/2021
Hazard/ Incident	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Risk	Control Measures / Corrective Action	
Fire	<ul style="list-style-type: none"> Ignition of combustible materials stored on site; Electrical faults; Arson, natural causes or Spontaneous Combustion. 	Minor	Possible	MEDIUM	Fire-fighting equipment (such as fire extinguishers) is provided on-site, No smoking policy will be enforced on site, Water cart, Emergency Response Procedures, or Evacuation Procedures.	
Explosions	Risk of explosion would be from: <ul style="list-style-type: none"> Improper use or storage of dangerous goods; Combustible gas release; Ignition of combustible materials stored on site. 	Severe	Rare	SIGNIFICANT	Fire-fighting equipment (such as fire extinguishers of various types) is provided on-site, No smoking policy on site, Emergency Response Procedures, and Evacuation Procedures.	
Non-Clean Water	Non-clean water could be generated after heavy rainfall and as a result of dirty vehicle wheels and underbodies	Minor	Possible	MEDIUM	Based on the last 8 years of operations, the much-improved water management system has been proven satisfactory in preventing water pollution. Additional water pollution mitigation measures have been implemented on site to minimize non-clean water from leaving the site prior to being treated to acceptable standards. All vehicles must not have dirty wheels or underbodies especially while leaving the site.	

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<p>Dust</p>	<p>Dust could be generated on site during waste processing, stockpiling and screening activities.</p> <p>Dust could also be generated from the traffic within the external areas of the site.</p> <p>Dust</p>	<p>Minor</p>	<p>Possible</p>	<p>MEDIUM</p>	<p>Implementation of dust mitigation measures should assist in minimising the generation of dust. Most dust generated during the different processing steps is managed by the use of water sprinklers, hoses and a mobile water-cart. Environmental inspections are carried out to identify situations or activities that may pose environmental harm and be able to control measures as quickly as possible. The inspection may cover the entire site or just a specific area.</p> <p>Enforcement of traffic management within the site will assist in preventing the generation of dust from the traffic. In addition, cleaning of vehicle wheels and underbodies will assist in preventing the generation of dust and the tracking of sediment to the street which may result in the generation of dust.</p>
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2.4 SUMMARY OF SAFETY SYSTEMS

As mentioned above, a number of important safety features have been incorporated into the design and operation of the Site to reduce the possibility of such hazardous events from happening or minimize their impacts in terms of potential effects on human health and the surrounding environment.

2.4.1 Dangerous Goods Storage Areas

All dangerous good storage within the workshop comply with the relevant Australian/New Zealand Standards to ensure segregation of different classes of dangerous goods, minimum separation distances to the nearest on-site facilities and ignition sources and bunding arrangements.

Additional precautions have also been implemented including:

- Regular inspection of bund integrity,
- Review of bunding design needs to be undertaken if any changes to the contents of containers within the bunds are implemented or upon any changes to legislation relating to dangerous goods storage.

2.4.2 Spill Control Equipment

Due to the nature of the majority of dangerous goods kept on the site, a quantity of dry soda ash is kept on site. This soda ash is mainly used for liquid spills. Spill kits are also provided at high risk and strategic locations at the site including:

- The dangerous goods store room/workshop, and
- Within the main active working area.

Spill kits contain Spill Mats, Absorbent materials, Shovels, Knife Valves.

In addition to the above, the site has several tonnes of highly absorbent dry materials stored on site at all times as part of its normal activities. These materials could also be used to contain any liquid chemical spills.

2.4.3 Fire Fighting Equipment

External fire hydrants, hose reels and portable fire extinguishers have been provided for fighting purposes in accordance with the requirements of the Building Code of Australia (BCA) and relevant Australian Standards. **Table 2-3** includes a list of fire- fighting equipment available on site.

Table 2-3: Fire Fighting Equipment

Equipment Description	Quantity
Fire Hose Reels	1
Fire Extinguishers (Carbon Dioxide)	2
Fire Extinguishers (Dry Chemical)	2
Water Cart	1

2.4.4 Personal Protective Equipment (PPE)

Personal protective equipment available to employees includes:

- Coveralls,
- Eye Protection,
- High Visibility shirts,
- Safety Boots;
- Various Gloves,
- Breathing Masks,

2.4.5 Material Safety Data Sheets (MSDS)

Material Safety Data Sheet (MSDS) registers are located in the main administration office and at the workshop. A list of all chemicals with their classifications is included in **Attachment 2**.

3. NOTIFICATION OF POLLUTION INCIDENTS

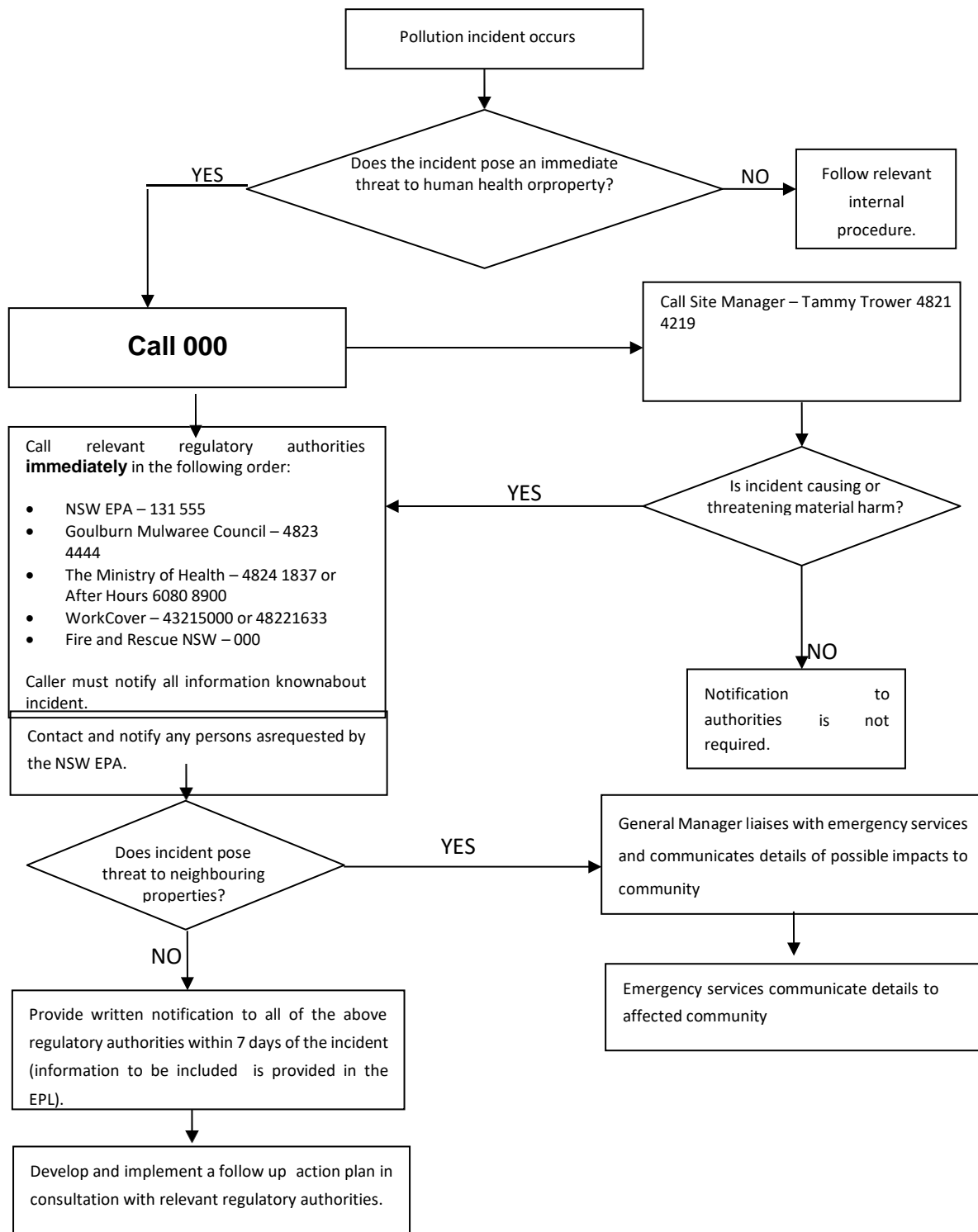
A pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified. This section details how, when and who needs to be notified. The Pollution Incident Response Procedure provides a step by step of how to notify a pollution incident and provides relevant documentation that needs to be maintained by the relevant person/s.

The following is a simple flowchart detailing how to respond to a pollution incident. A Notification of a Pollution Incident Procedure is provided as **Attachment 1**.

3.1 WHEN TO NOTIFY?

The flowchart included in **Figure 3-1** below, provides an excellent guide to relevant RHRSS personnel to determine when to notify an incident.

Figure 3-1: Notification of a Pollution Incident





Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it **immediately**.

3.2 WHO TO NOTIFY

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service

If the incident does not present an immediate threat, or once the initial 000 call has been made:
Notify the relevant authorities in the following order:

NSW EPA – Environment Line 131 555

Goulburn Mulwaree Council – 4823 4444

Ministry of Health Goulburn – 4824 1837 or After Hours 6080 8900

WorkCover on 4321 5000 or 4822 1633 (WorkCover will ask for the ABN)

Fire and Rescue NSW – 000

Notify other persons as required by the EPA.

3.3 WHAT TO NOTIFY?

Section 150 of the POEO Act specifies relevant information about a pollution incident to be given as follows:

- (a) the time, date, nature, duration and location of the incident,*
- (b) the location of the place where pollution is occurring or is likely to occur,*
- (c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,*
- (d) the circumstances in which the incident occurred (including the cause of the incident, if known),*

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(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,

(f) other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

3.4 CONTACTS

Site and other related personnel with specific responsibilities for incident response and management need to be contacted in the event of an incident. This section also provides the full contact details of the relevant regulatory authorities.

3.4.1 Emergency Services Contacts

Table 3-1 includes contact details for all emergency services to facilitate the process in immediate action, if and when an incident occurs.

Table 3-1: Emergency Services

Organization	Contact Phone Number
Ambulance	000
Fire Brigade	000
Police	000
NSW EPA	13 15 55
Goulburn Police Station	4824 0799
Goulburn Fire Brigade	4822 1608
Goulburn Hospital	4827 3111
EPA Environment Line	13 15 55
Dangerous Goods Licensing Hotline	13 10 50
Work Cover – Goulburn	4822 1633
DPI (NSW Fisheries)	6391 3100
WIRES	1300 094 737
Goulburn Mulwaree Council	4823 4444
Ministry of Health – Goulburn	4824 1837 or After Hours 6080 8900
Sydney Catchment Authority	1800 061 069
Telstra	1800 307 516
Energy Australia	13 34 66
Gas (AGL)	13 12 45
Dial before you dig	1100

3.4.2 Site Contacts

This section contains the names, positions and 24-hour contact details of those key individuals who:

- (i) are responsible for activating the plan, and
- (ii) are authorised to notify relevant authorities under section 148 of the Act, and
- (iii) are responsible for managing the response to a pollution incident.

Table 3-2 lists the key individuals and their responsibilities. These key individuals are listed in order of who to contact in the event of a pollution incident at the site.

Table 3-2: Emergency Site Contact Details

Position	Name	Organisation	Phone
Site Manager	Tammi Thrower	RHRSS	02 4821 4219
WHS Manager	Tracy Fry	DENRITH PTY LTD	0459298206
Environmental Engineer	Cassio Costa	DENRITH PTY LTD	0420792896

3.4.3 Regulatory Authorities Contacts

The contact details of each relevant authority referred to in section 148 of the Act that are relevant to this site include:

- NSW EPA – Environment Line 13 15 55
- Goulburn Mulwaree Council – 4823 4444
- Ministry of Health (Goulburn) – 4824 1837 or After Hours 6080 8900
- WorkCover on 4321 5000 or 4822 1633 (WorkCover will ask for the ABN)
- Fire and Rescue NSW – 000

3.4.4 Closest Residential Zoned Areas

The closest residential zoned areas have been identified in **Table 3-3** and are shown in **Figure3-2**.

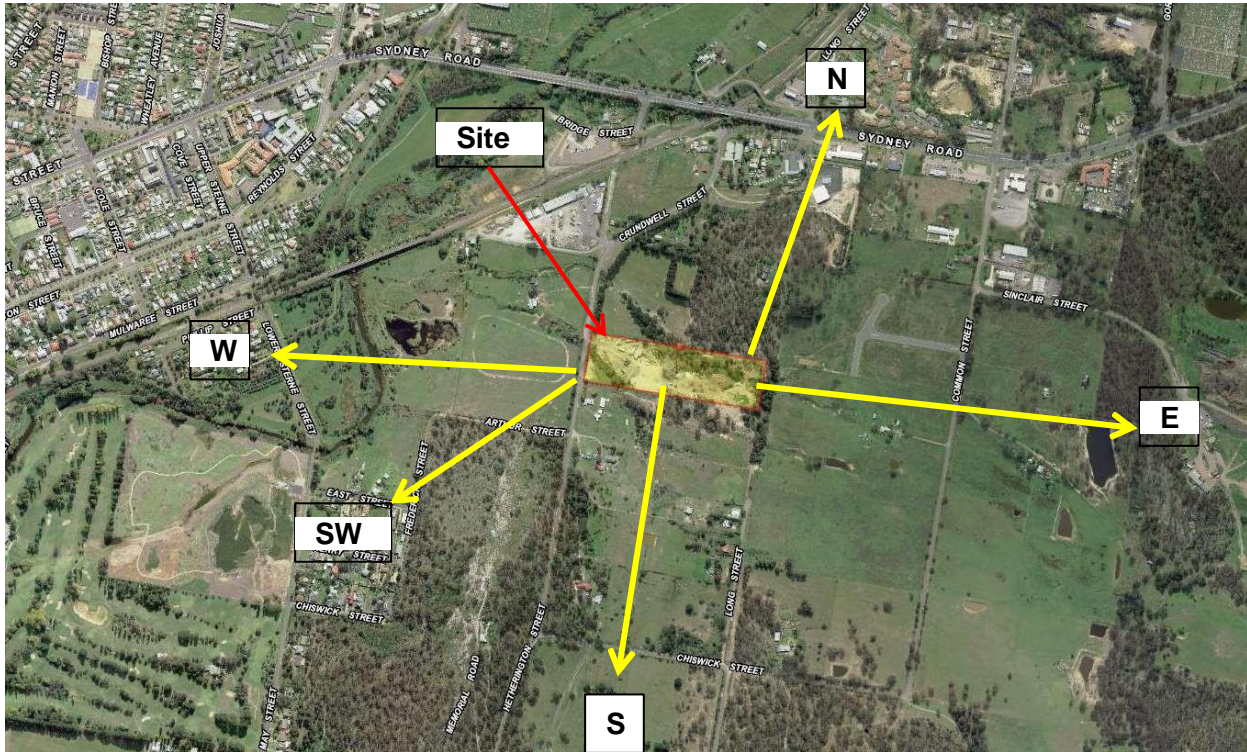
Table 3-3: Distances to Closest Residential Zoned Areas

Direction	Distance from Site boundary (m)	Distance from Middle of Site (m)	Comments
N	555	670	In addition to the protection provided to this residential area due to distance and bushland, there is a main Road (Sydney Road) and several commercial activities between the site and the residential area. This should be sufficient to provide adequate attenuation for potential noise and dust impacts
E	>1,500	>1,500	The existing bushland and the large distance to any residential area in this direction provide adequate attenuation for potential noise and dust impacts
S	>1,000	>1,000	The existing bushland and the large distance to any residential area in this direction provide adequate attenuation for potential noise and dust impacts
W	700	890	The existing bushland and the large distance to any residential area in this direction provide adequate attenuation for potential noise and dust impacts. Road noise on an adjacent main road would most likely generate higher noise levels at this residential area
SW	480	660	The existing bushland and the large distance to any residential area in this direction provide adequate attenuation for potential noise and dust impacts.

N= North – S= South – E= East – W= West SE= South East – NE= North East
NEE= North East East – SEE= South East East

Figure 3-2 shows the locations of the closest residential zoned areas in relation to the site. Larger Figure is included in **Attachment 3**.

Figure 3-2: Locations of Residential Zoned Areas



3.4.5 Potentially Sensitive Receptors

In addition to the above information associated with the closest residential zoned areas, this section shows the locations of potentially sensitive receptors/neighbouring facilities. These have been identified in **Table 3-4** and are shown in **Figure 3-3**.

Table 3-4: Potentially Sensitive Receptors

Receptor	Nature of Occupancy/ Sensitivity	Approximate Distance to Resident	Contact Details	Address
Residential premises	Residential receptor – R1	100 m SW	Unknown	37 Hetherington Street, Goulburn
Residential premises	Residential receptor – R2	171 m SW	Unknown	41 Hetherington Street, Goulburn
Residential premises	Residential receptor – R3	228 m S	Unknown	45 Hetherington Street, Goulburn
Residential premises	Residential receptor – R4	429 m SSW	Unknown	53 Hetherington Street, Goulburn
Residential premises	Residential receptor – R5	200 m N	Unknown	25 Hetherington Street, Goulburn
Residential premises	Residential receptor – R6	149 m NW	Unknown	62 Hetherington Street, Goulburn
Residential premises	Residential receptor – R7	299 m S	Unknown	Long Street, Goulburn
Residential premises	Residential receptor – R8	227 m N	Unknown	Lot 1 DP661037, Goulburn
Residential premises	Residential receptor – R9	273 m E	Unknown	48 Common Street, Goulburn
Rocky Hill War Memorial	Commercial receptor – C1	SW – 480 m		100 Hetherington Street, Goulburn

N= North – S= South – E= East – W= West

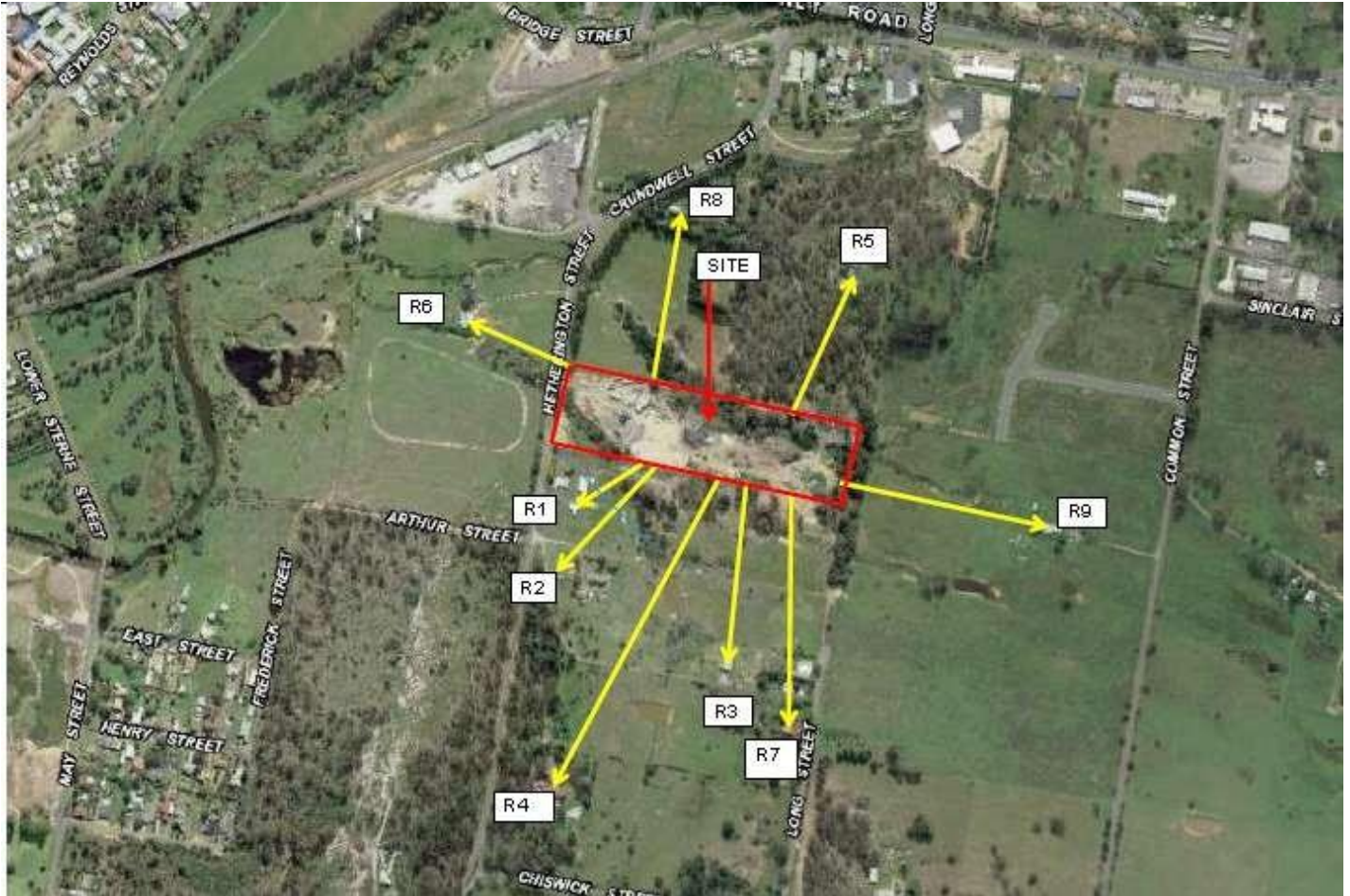
SE= South East – NE= North East

SSW= South South West

Table 3-4 will be updated as communications with nearby property occupiers progress and more details are known.

Figure 3-3 shows the approximate locations of the potentially sensitive residential receptors in relation to the site. Larger Figure is included in **Attachment 3**.

Figure 3-3: Locations of Potentially Sensitive Residential Receptors



4. MINIMISING RISK OF HARM

This section details the actions to be taken immediately following a pollution incident including pre-emptive actions, use of safety equipment, early warning mechanisms and reducing the risk of harm.

4.1 PRE-EMPTIVE ACTIONS

A number of pre-emptive actions would be implemented to prevent or minimize any risk of harm to human health or the environment depending on the type, nature and scale of the incident.

4.1.1 General Pre-emptive Actions

General pre-emptive actions could include but are not limited to the following:

- Provision and use of spill containment kits and spill response equipment,
- Closing stormwater cut off valves, if available, and/or use existing stormwater management system/mitigation measures,
- Use of fire-safety equipment,
- Actions in response to results of any air emission monitoring,
- Dust mitigation measures are implemented on site at all times in accordance with the site’s management system.

Mitigation measures that can be classified as other pre-emptive actions include:

- The use of danger tags and out-of-service tags, to prevent any person from using dangerous and faulty equipment on site respectively,
- Employees, visitors and contractors are required to undergo a site induction and competency test that would identify potential pollutants, hazards, safety equipment & procedures and how to respond in the event of a pollution incident, along with other safety and emergency information. This will apply to all above people if they are entering active working areas or workshop,
- Signs will be affixed to different structures on site identifying potential hazards. This could include non-smoking areas and designated smoking areas, and
- Signs will be affixed to different structures on site identifying spill kits, first aid kits, fire extinguishers and fire hydrants.

Response actions for dealing with pollution incidents are also included in the site’s Work Health & Safety Management Plan as well as this document.

4.1.2 Specific Pre-emptive Actions

The specific pre-emptive actions that should be taken for the specific type of hazards are included in **Table 4-1**. **Table 4-1** includes also the following details:

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- Hazard/Incident
- External Release
- Neighbours Impacted/Extent of Impact
- Communication Methods
- Early Warnings
- Pre-emptive Actions and Other Control Measures

4.2 SAFETY EQUIPMENT

Procedures and plans relating to safety, emergency response and spill response equipment include:

1. Work Health & Safety Management Plan,
2. Pollution Incident Response Management Plan,
3. Environmental Management System, and
4. Other procedures that could be required by the authorities.

Emergency and spill safety equipment are located in the following areas on site:

- Several Fire extinguishers (various types) are located at strategic locations throughout the site,
- A hose reel for firefighting purposes is also installed within the site,
- Several emergency spill response kits are located at several location of the site,
- Spill response kits are for both internal and external spills.

4.2.1 Alarm System

Currently the whole site is covered with a highly sophisticated back to base alarm monitoring system to ensure that any irresponsible and/or inappropriate activities conducted by visitors, contractors and employees alike would be addressed promptly. This is a very useful tool to also monitor any activities outside normal working hours. These activities may include unauthorised access to the site and vandalism.

In addition to this monitoring system, a highly sophisticated alarm system is also installed as part of the overall security system.

4.3 EARLY WARNING MECHANISMS

For any incident that has a risk on human health or the environment external to the site, early warnings and regular updates will be provided to any premises or neighbouring facility or resident



likely to be affected. This would be undertaken by key staff members.

A variety of communication mechanisms are available to provide early warnings and regular updates depending on the type, scale and nature of the incident, including:

- Website,
- Telephone calls and emails,
- Direct or indirect communication with Community,
- Letterbox drops,
- Door knocking, and
- Other: _____

Specific information would be provided to potentially affected premises via the above avenues to minimize the risk of harm as appropriate to the circumstances. **Table 4-1** includes specific early warnings and pre-emptive actions for each potential risk.



Table 4-1: Early Warnings and Pre-emptive Actions

Site Name: Rocky Hill Recycled Sand & Soil Pty Limited				Responsible person: Site Manager	Date: Oct/2021
Hazard/Incident	External Release	Neighbours Impacted/ Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures	
Fumes	Air	Unlikely impact on adjacent properties	<p>For minor uncontrolled fume releases, internal communications are established to stop, minimize and isolate the cause of the fumes.</p> <p>For large uncontrolled fume releases, internal and external communications, and early warnings should be established during the incident. This may include notifications to EPA, Fire Brigade, police and adjacent properties.</p>	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, and • Contractors Work Planning Form. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, and • Fire-fighting equipment & training. <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Emergency Response Plan, • Evacuation Plan, • Incident Reporting Procedure, and • Identify source and rectify problem promptly. 	

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Spills	Air, Waterways	Typically negligible offsite, however major spills would have potential to impact on local air quality and nearby waterways.	Communication and early warnings can only be established after the incident has occurred, and would be conducted via telephone to EPA, and/or police. Premises adjacent to the site would also be alerted via visits by key employees or by the police.	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, and • Contractors Work Planning Form. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, • Diversion drains and/or internal management system, • Oil/water separator installed in strategic location, and • Spill kits located in high risk areas. <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Spill Response procedures, • Emergency Response Plan, • Evacuation Plan, • Incident Reporting Procedure, and • Identify source and rectify problem promptly.
Fires	Air, waterways	<p>Depend on size of incident. Major fires would impact on the adjacent properties.</p> <p>Minor and localized fires would have minimal impact and would be dealt with by the operator.</p>	<p>For developing fires, telephone to fire brigade, EPA and police. If required, visits to potentially affected residences would be conducted by the police or by key RHRSS's employees to provide necessary warnings.</p> <p>For instantaneous and uncontrolled fires, communication and early warnings can only be established during the incident, and would be conducted via telephone to fire brigade, EPA,</p>	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, • Contractors Work Planning Form, and • No smoking policy. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, • Firefighting equipment & training, • Oil/water separator installed, and • Diversion drains and/or internal management system <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Emergency Response Plan & procedures, • Evacuation Plan, • Incident Reporting Procedure, and • Identify source and rectify problem promptly.

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			and police. Premises adjacent to the site would also be alerted via visits by key employees or by the police.	
Fires	Air, waterways	<p>Depend on size of incident. Major fires would impact on the adjacent properties.</p> <p>Minor and localised fires would have minimal impact and would be dealt with by the operator.</p>	<p>For developing fires, telephone to fire brigade, EPA and police. If required, visits to potentially affected residences would be conducted by the police or by key RHRSS's employees to provide necessary warnings.</p> <p>For instantaneous and uncontrolled fires, communication and early warnings can only be established during the incident, and would be conducted via telephone to fire brigade, EPA, and police. Premises adjacent to the site would also be alerted via visits by key employees or by the police.</p>	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, • Contractors Work Planning Form, and • No smoking policy. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, • Firefighting equipment & training, • Oil/water separator installed, and • Diversion drains and/or internal management system <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Emergency Response Plan & procedures, • Evacuation Plan, • Incident Reporting Procedure, and • Identify source and rectify problem promptly.

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Non-clean Water	Waterways	Depend on size of incident. Adjacent properties would be the worst affected.	Hazard/incident is slow to occur. Communication and early warnings can only be established after the hazard/incident has occurred, and would be conducted via telephone EPA, and Goulburn Mulwaree Council. Premises downstream of the site would also be alerted via visits by key employees.	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, • Contractors Work Planning Form, and • No smoking policy. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, • Diversion drains and/or internal management system. <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Spill Response procedures, • Incident Reporting Procedure, and • Identify source and rectify problem promptly.
Dust	Nearby properties	Provided that all dust control mitigation measures are fully implemented onsite, there should not be any dust emitted to adjoining properties.	Communication and early warnings would be established after the hazard/incident has occurred, and would be conducted via telephone to EPA and Goulburn Mulwaree Council. Premises adjacent to the site would also be alerted via visits by key employees.	<p>Pre-emptive actions undertaken include:</p> <ul style="list-style-type: none"> • Site induction with competency test, • Contractors Work Planning Form, and • Dust controls are monitored regularly. <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Early detection by operators and staff, and • Dust mitigation measures implemented. <p>Corrective actions include:</p> <ul style="list-style-type: none"> • Emergency Response Plan, • Incident Reporting Procedure, and • Identify source and rectify problem promptly.

4.4 MAPS & PLANS

Detailed maps showing the location of the premises, the surrounding areas and other relevant maps and plans are included in **Attachment 3**. Attached are also site layouts that show locations of all features of the site including locations of the different processes. Most drawings are produced on an A3 size sheets to provide a better illustration of the areas.

These plans include the following:

- Site location in the regional context;
- Site location in the local context;
- Aerial views of the site showing the site and surrounding environment;
- Locations of potentially sensitive receptors in relation to the site; and
- Site Layouts and Plans.



5. STAFF TRAINING

Key personnel with responsibilities relating to the notification of pollution incidents and the implementation of the PIRMP need to undertake training in the following aspects:

- What constitutes a pollution incident that requires notification and that it needs to be notified "immediately";
- Definitions of "pollution incident", "material risk of harm", and "immediately";
- New responsibilities in relation to notification of a pollution incident; and
- Notification of a pollution incident procedure (Attachment 1) i.e.: when to notify, who to notify, what to notify.

These staff members would also need to be aware of their specific responsibilities in relation to the Pollution Incident Response Management Plan.



6. TESTING OF PLAN

Pollution Incident Response Management Plans must be tested routinely every 12 months and within one month of any pollution incident that warrants reporting.

Testing of the PIRMP could be incorporated with the testing of other related plans and needs to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner.

Testing must cover all components of the plan including the effectiveness of staff training.

This is undertaken as follows:

- Annual review of PIRMP and other related plans standard procedures to ensure all information is accurate and up to date; and
- Regular drills.

Records of drills and reviews are maintained including:

- The dates on which the plan has been tested and updated;
- The name of the person/s who carried out the test/drill/review; and
- If a drill is undertaken, the details of what was tested, how effective the drill was and any changes required to the plan / procedures.



7. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for the preparation of Pollution Incident Response Management Plans. No guarantees are either expressed or implied.

This plan has been prepared solely for the use of RHRSS Pty Ltd, as per our agreement for providing environmental services. Only RHRSS Pty Ltd is entitled to rely upon the information provided in this plan within the scope of work described in this plan. Otherwise, no responsibility is accepted for the use of any part of the plan by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this plan, no warranty is given, nor liability accepted (except what otherwise is required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by RHRSS Pty Ltd for the purposes of preparing this plan.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

ATTACHMENTS

Attachment 1: Notification of a Pollution Incident Procedure

Rocky Hill Recycled Sand Soil Pty Ltd

PROCEDURE NO: 01

NO OF PAGES: 5

DATE: 19/10/21

PREPARED BY: Divall's Earthmoving and Bulk Haulage

ISSUE NO.: 1

SUBJECT: NOTIFICATION OF A POLLUTION INCIDENT AT THE FACILITY

1. PURPOSE

The purpose of this procedure is to give clear instructions regarding who to notify during a pollution incident at the facility that is assessed to present a risk of material harm to the environment.

2. METHOD

A flowchart is provided on following this procedure.

First Point of Contact:

1. An event occurs which you believe presents an immediate threat to human health or the environment. Stop work and push local emergency stops (if safely accessible) to shut down operations and close any valves, etc., as necessary. The alarm will then notify the General Manager or nominated delegate.
2. If there is no immediate threat to human health or the environment, follow the relevant internal procedure.

Notification of Regulatory Authorities (General Manager or delegate):

1. If the event is causing or threatening material harm to the environment, the General Manager or delegate shall contact the regulatory authorities in the following order:

NSW EPA – 131 555

Goulburn Mulwaree Council – 4823 4444

The Ministry of Health – 4824 1837 or After Hours 6080 8900

WorkCover Authority – 02 4321 5000 or 02 4822 1633

Fire and Rescue NSW – 000

Note: "material risk of harm to the environment" needs to be notified if:

- It involves potential harm to the health or safety of human beings or ecosystems that is not trivial; or
- It results in loss of property damage exceeding \$10,000; or
- Loss includes costs incurred in taking all reasonable measures to prevent or mitigate harm to the environment.

2. Notify any persons as requested by the NSW EPA.

3. What to Notify:

- Your full name, address and telephone contact details;
- Date, time and duration of the incident;
- The type of pollutant or a description of the incident;
- Discharge or emission location of the incident;
- The extent or size of the area where the pollution is occurring; and
- Anything else that is relevant to the incident.

Notifying Neighbouring Properties:

If the incident has a risk on human health or the environment external to the site, early warnings and regular updates are to be provided to any premises likely to be affected. The General Manager needs to assess the situation and liaise with emergency services to determine:

1. Who to contact. The potentially sensitive receptors and neighbouring facilities have been identified in the following **Table 1**, and the Figures included in **Attachment 3** of this plan.

Table 1: Potentially Sensitive Receptors

Receptor	Nature of Occupancy/ Sensitivity	Approximate Distance to Resident	Contact Details	Address
Residential premises	Residential receptor – R1	100 m SW	Unknown	37 Hetherington Street, Goulburn
Residential premises	Residential receptor – R2	171 m SW	Unknown	41 Hetherington Street, Goulburn
Residential premises	Residential receptor – R3	228 m S	Unknown	45 Hetherington Street, Goulburn
Residential premises	Residential receptor – R4	429 m SSW	Unknown	53 Hetherington Street, Goulburn
Residential premises	Residential receptor – R5	200 m N	Unknown	25 Hetherington Street, Goulburn
Residential premises	Residential receptor – R6	149 m NW	Unknown	62 Hetherington Street, Goulburn
Residential premises	Residential receptor – R7	299 m S	Unknown	Long Street, Goulburn
Residential premises	Residential receptor – R8	227 m N	Unknown	Lot 1 DP661037, Goulburn

Residential premises	Residential receptor – R9	273 m E	Unknown	48 Common Street, Goulburn
Residential premises	Residential receptor – R8	227 m N	Unknown	Lot 1 DP661037, Goulburn

N= North – S= South – E= East – W= West

SE= South East – NE= North East

SSW= South South West

Table 1 will be updated as communications with nearby property occupiers progress and more details are known.

2. Decide on the method of communication that will be used. One or a combination of the following:
 - Telephone calls;
 - Incident notifications on the company website;
 - Letterbox drops; or
 - Door-knocking

3. Assign a responsible person to be a community contact who can provide updates on the situation and other relevant information about the incident.

4. Determine what information is to be provided. An example includes:
 - Date and time of the incident;
 - Brief description of the incident including nature and extent;
 - Information regarding the materials involved in the incident;
 - What actions are being taken to mitigate the impact from the incident;
 - Potential effects of the pollutant/s released during the incident and potential affected areas;
 - What they can do to protect themselves; and
 - A contact number to enable receptors to call for updates on the situation.

5. Determine those who will be responsible for communicating with the neighbouring properties and undertake the notification in consultation with Emergency Services.

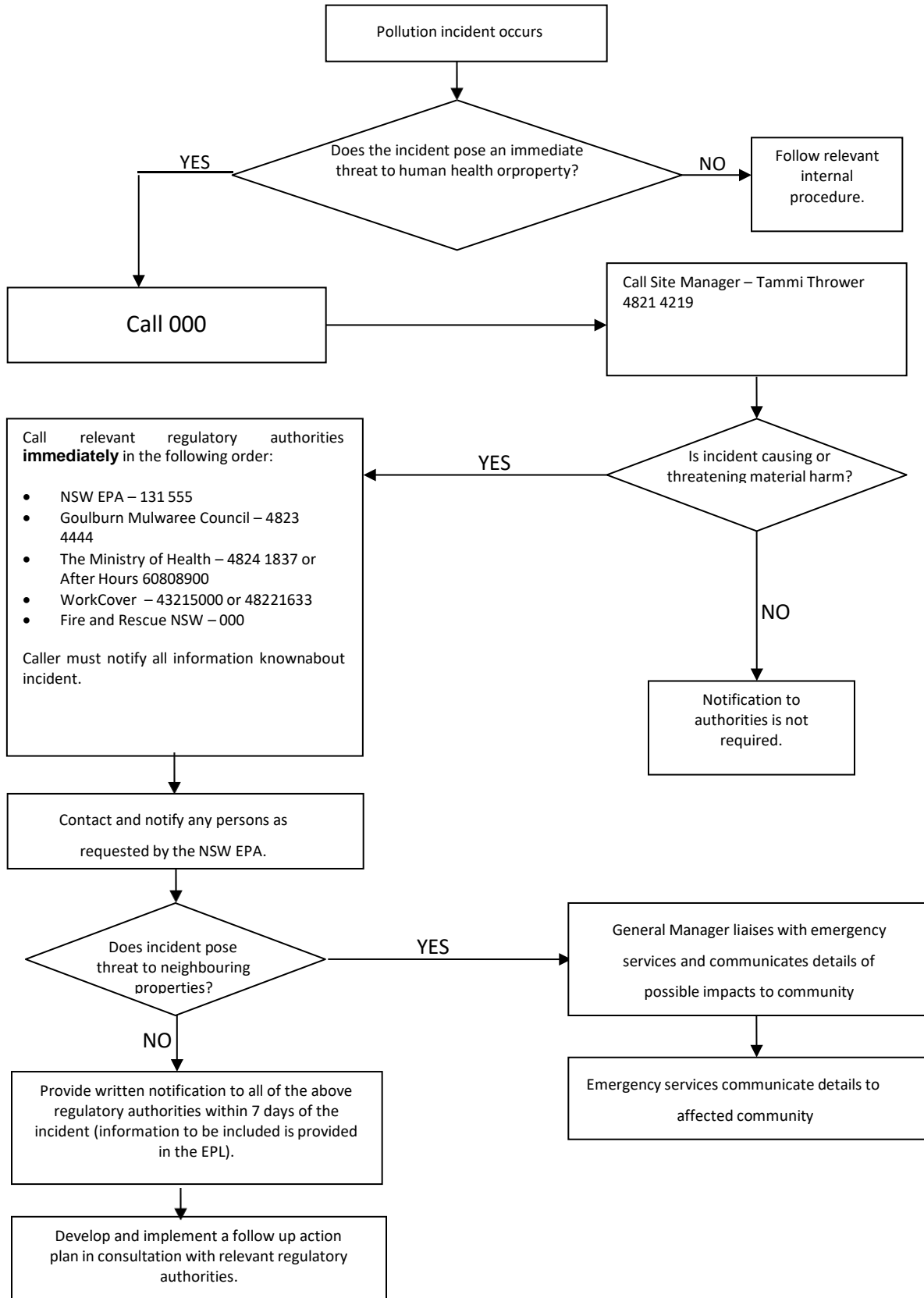
6. Record the details of all of the above and file on site.

3. WRITTEN REPORT

An incident report will be prepared and provided to all of the above regulatory authorities within 7 days of the incident. Refer to the Site Environment Protection Licence (EPL) for information required to be included in the report.

Develop and implement a follow up action plan in consultation with relevant regulatory authorities.

FLOWCHART: NOTIFICATION OF A POLLUTION INCIDENT AT THE FACILITY



Attachment 2: List and classification of all chemicals used and/or stored on site

CHEMICALS

Site: 27 Hetherington Street, Goulburn NSW

Client: RHRSS Pty Ltd

Product / Substance / Chemical Name	Hazardous / Non Hazardous	Dangerous Goods Code	UN Number	Maximum Quantity	Type of Application	Risk Assessment (Class 1,2 or 3)	Control(s) based on the risk class
Grease	Non Haz.	N/A	N/A	10 tubes	Lubricating plant	3	Use gloves during the application
Hydraulic Oil	Non Haz.	N/A	N/A	200 litres	Plant	3	Use gloves during the application
Engine Oil	Non Haz	N/A	N/A	200 litres	Plant	3	Use gloves during the application
Diesel	Hazardous	N/A	N/A	700 litres	Plant	2	Use gloves during the application. Ensure adequate ventilation. Use eye protection if risk of splashes.
Unleaded Petrol	Hazardous	N/A	N/A	100 litres	Light Vehicles	2	Use gloves during the application. Ensure adequate ventilation. Use eye protection if risk of splashes.

Class 1: (High Risk) – Does the substance and its associated hazards have the potential to kill, or cause permanent disability, eg lung disease?

Class 2: (Medium Risk) – Does the substance and its associated hazards have the potential to cause a serious injury, or illness, which will temporarily disable, eg Dermatitis?

Class 3: (Low Risk) – Does the substance and its associated hazards have the potential to cause a minor injury, which would not disable, eg mild skin rash?

Attachment 3: Site Maps and Plans

Figure A1: Location of the site in the regional context



Figure A2: Location of the site in the local context



Figure A3: Potentially Sensitive Receptors and other Neighbouring Properties

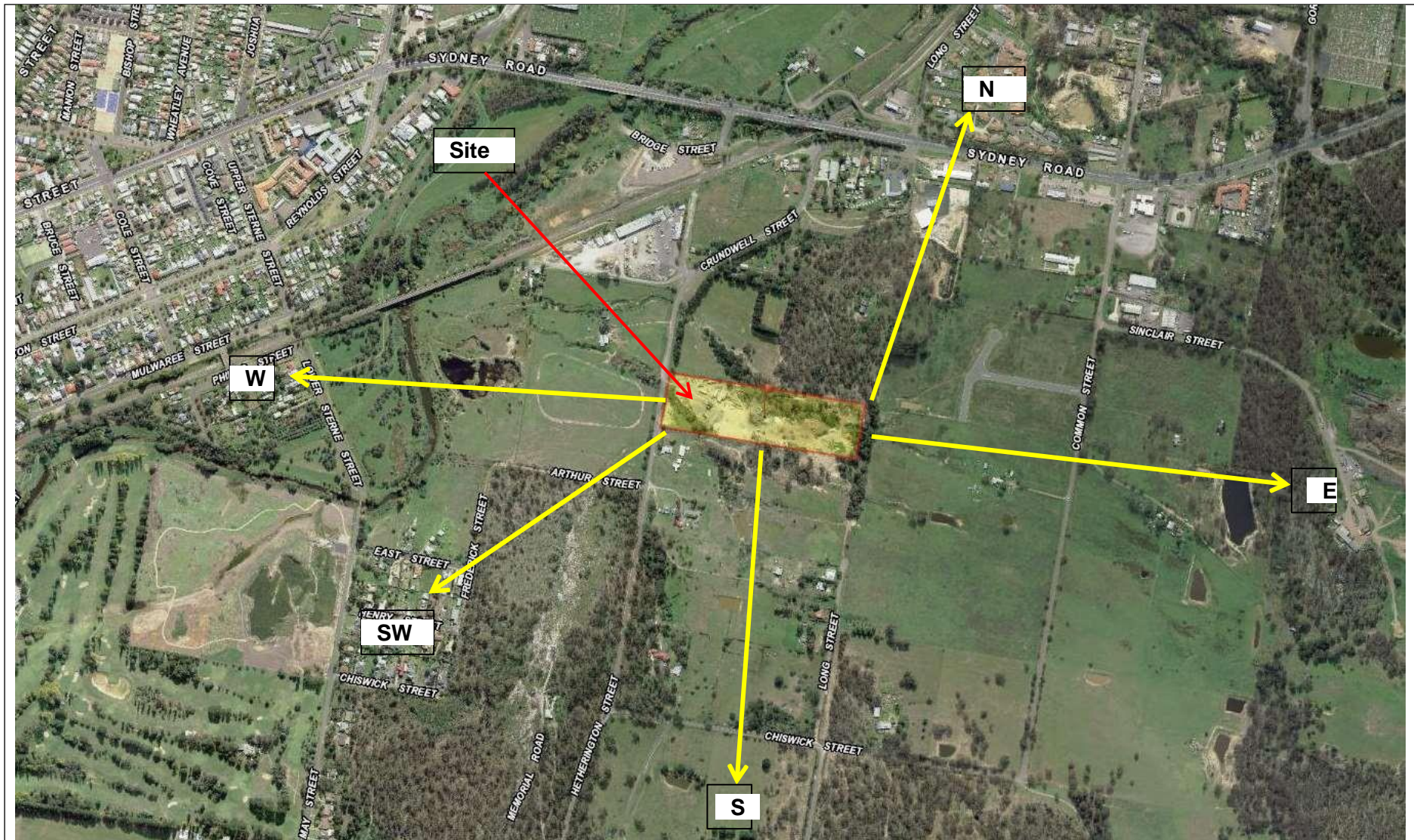



Figure 4: Locations of Potentially Sensitive Residential Receptors



Figure A6: Detailed Rocky Hill Site Layout - 27 Hetherington Street, Goulburn – Sheet



A	Entry/Exit	F	Office & Amenities	K	Storage Materials
B	Retention Pond	G	Oil/Water Separator	L	Soil Conditioner
C	Storage Materials	H	Storage Compound	M	Green Waste
D	Staff & Visitors Car park	I	Storage Materials	N	Builders Waste
E	Weighbridge	J	Retention Pond	O	Processing/Drop-off Area
		Waterway through the facilities			



ENVIRONMENTAL POLICY

RHRSS Pty Ltd trading as Rocky Hill Sand & Soil is an Australian Family owned and operated company with an environmentally friendly landscaping materials recycling and supply facility in Goulburn, NSW. RHRSS specializes in supplying natural and clean recycled materials received from recycling facilities to mainly landscaping and brick layers for use in a variety of applications. Our facility use industry's best management practices to ensure that our materials conform to all environmental, planning and Australian Standards requirements.

This policy applies to all our facility including the office, the employees and contractors. RHRSS has adopted a realistic approach to environmental management and is committed to continually improving its environmental performance and minimizing the impacts of its activities on the environment by:

- Minimizing the consumption of energy and water at our Goulburn site;
- Minimizing the generation of waste by re-using, recycling and separating;
- Maximizing our workplace efficiency by keeping up to date with the latest industry's best management practices and implementing them into our facility;
- Making environmentally sound purchasing decisions;
- Working with suppliers and customers to reduce the environmental impact of materials transportation;
- Complying with all relevant environmental legislation, policies and guidelines;
- Educating our employees, contractors and customers to minimize environmental impact through staff awareness, participation and feedback;
- Setting reasonable and achievable environmental objectives and targets, and developing programs to achieve these; and
- Incorporating environmental sustainability principles into all our core activities.

RHRSS Pty Ltd will endeavor to integrate plans and programs into our daily activities to prevent pollution by minimizing the risks of our activities on the environment.

Andy Divall
Director

October 2023



WORK HEALTH & SAFETY COMMITMENT STATEMENT

RHRSS Pty Ltd trading as Rocky Hill Sand & Soil is an Australian Family owned and operated company with an environmentally friendly landscaping materials recycling and supply facility in Goulburn, NSW. RHRSS specializes in supplying natural and clean recycled materials received from recycling facilities to mainly landscaping and brick layers for use in a variety of applications.

RHRSS Pty Ltd is committed to protecting the health and safety of all its employees, other people on site and the general public to the highest possible standards. RHRSS Pty Ltd has developed a health and safety management system that is integrated with all organizational activities.

To achieve this aim we will:

- Comply with all applicable health and safety laws, regulations and standards;
- Provide and maintain a safe working environment;
- Provide safe plant and equipment, for controlled work;
- Implement risk management systems which are relevant and suitable for the organization's risk exposure as well as identify, promote and continuously improve health and safety performance;
- Ensure that all personnel receive appropriate health and safety training;
- Apply procedures to reduce risks and hazards at the workplace;
- Ensure that any injuries are treated and reported promptly;
- Thoroughly investigate the causes of any accidents, injuries or near misses to prevent a recurrence;
- Regularly review health and safety practices;
- Maintain relevant policies, procedures, systems, information, training, recognition programs, and organizational structures to support and communicate effective health and safety practices throughout the Company;
- Effectively consult with all employees about all health and safety matters; and
- Encourage active participation, consultation and cooperation of all employees, contractors and visitors in promoting and developing measures to improve health and safety at work.

Employees of RHRSS Pty Ltd must always comply with statutory or regulatory requirements. The procedures described here are basic requirements and apply to all personnel at all times.

Andy Divall
Director

October 2023