

Darlington Point (Waddi) Sand Pit Pollution Incident Response Management Plan v1 ENV-PLA-2124 DRLQ-010

Environment Protection Licence Number: 21567



Waddi Sand Pit

Lot 175 DP 750908, Kidman Way, Darlington Point, NSW

	Title	Name	Date
Creator	Principal Environmental Scientist	B Dwyer	16/03/2023
Reviewer	Darlington Point Sand Pit Manager	N Campbell	16/03/2023
Reviewer	Regional Quarry Manager – Milbrae West	T Walter	16/03/2023
Reviewer / Approver	Environment and Compliance Manager	S Rankin	17/03/2023

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1 Purpose

E.B. Mawson & Sons Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Milbrae Darlington Point (Waddi) Sand Pit. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

2 Definition of Material Harm to the Environment

This plan must be activated in the event of a *pollution incident* that causes or threatens *material harm* to the environment.

Pollution incident means a leak, spill or other escape or deposit of a substance, which causes or is likely to cause pollution (does not include an incident involving only the emission of noise).

Pollution means (broadly) release or introduction of any substance to air, land or water.

Material harm means actual or *potential* harm to health or safety of human beings or ecosystems that is not trivial, cost to make good exceeds \$10,000. Includes incidents that only impact the premises where the incident occurs.

3 Environment Protection Licence (EPL) Details

Name of licensee:	E.B. Mawson & Sons Proprietary Limited ABN: 14 004 519 617
EPL number:	21567
Premises name and address:	Milbrae Darlington Point (Waddi) Sand Pit Lot 175 DP 750908, Kidman Way DARLINGTON POINT NSW 2706
Company or business contact details (business hours):	Name: Nathan Campbell Position or title: Quarry Manager Business hours contact number: 0439 527 589 Email: dps@mawsons.com.au
Company or business contact details (after hours):	Name: Shari Rankin Position or title: Environment and Compliance Manager Business hours contact number: 0433 845 432 Email: srankin@mawsons.com.au
Environmental concerns or complaints	Business hours contact number: 1800 423 456 After hours contact number: 0433 845 432
Website address:	www.mawsons.com.au
Scheduled activity/activities on EPL:	Extractive activities
Fee-based activity/activities on EPL:	Extractive activities
Ancillary activities on EPL:	Crushing, grinding or separating

4 Pollution Incident – Person/s Responsible

Responsibility	Person Responsible
PIRMP activation	Name: Nathan Campbell Position or title: Quarry Manager Business hours contact number: 0439 527 589 After hours contact number/s: 0439 527 589 Email: ncampbell@mawsons.com.au
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name: Shari Rankin Position or title: Environment & Compliance Manager Business hours contact number/s: 0433 845 432 After hours contact number/s: 0433 845 432 Email: srankin@mawsons.com.au
Managing response to pollution incident	Name: Nathan Campbell Position or title: Quarry Manager Business hours contact number: 0439 527 589 After hours contact number/s: 0439 527 589 Email: ncampbell@mawsons.com.au

5 Notifications – Relevant Authorities

Incidents that cause or threaten material harm (actual or potential harm that is not trivial, eg. loss/damage ~ \$10,000) must be reported to **all** relevant authorities **immediately**.

Authority	Contact Number
Fire and Rescue NSW / Rural Fire Service (first notification)	000
EPA	131 555
NSW Health – Murrumbidgee Public Health Unit	1800 011 824
SafeWork NSW	131 050
Local authority – Murrumbidgee Council	1300 676 243
NSW Resources Regulator	1300 814 609

6 Notifications – Neighbours and the Local Community [REDACTED]

Neighbours potentially impacted by a pollution incident at Darlington Point Sand Pit are those listed in Table 1 that are within approximately 1km of the quarry (see Figure 2 in Section 11). Contact details in Table 1 for neighbours proximate to Darlington Point Sand Pit have been redacted for privacy reasons.

Notification of neighbours is the responsibility of the Quarry Manager but may be delegated to a suitably trained person at the discretion of the Quarry Manager and in consultation with the Environment and Compliance Manager. It is the responsibility of the Quarry Manager to inform and update the Environment and Compliance Manager and to record the incident in O4i in accordance with ENV-PRO-001 Environmental Incident Management Procedure.

Table 1: Potentially impacted neighbours proximate to Darlington Point Sand Pit [REDACTED]

Neighbour Number	Address	Lot Number(s)	Contact Name(s)	Contact Details	Communication Requirements
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REDACTED

7 Hazards - Description and Likelihood

Table 2: Darlington Point Sand Pit risk assessment

Hazard	Pollution Incident (Material Harm)	Risk Assessment Prior to Pre-emptive Actions			Pre-emptive Actions	Risk Assessment After Pre-emptive Actions			Monitoring and Continuous Improvement		
		Inherent Risk				Residual Risk			Aspect to be Monitored	Details of Monitoring and Continuous Improvement	
		Likelihood	Consequence	Risk Rating		Likelihood	Consequence	Risk Rating			
Dust	Excessive dust resulting in nuisance to neighbours	Possible	Minor	Medium	<ul style="list-style-type: none"> Compliance with approved operating hours Exposed/disturbed areas minimised and revegetation undertaken progressively to reduce exposed/disturbed areas Water sprays installed and operational at critical locations on processing plant Drill rig fitted with engineered dust extraction/suppression Water cart utilised on exposed areas, roads and hardstands Site access roads and haul roads adequately maintained and appropriately speed limited Dust generating plant shut down during dust amplifying weather conditions Material drop heights for stockpiles reduced Continuous dust monitor deployed 	Possible	Minor	Medium	Air quality as per EPL 21567 and ENV-PLA-001 Air Quality Management Plan	<ul style="list-style-type: none"> Monitoring to be conducted in accordance with EPL 21567 and ENV-PLA-001 Air Quality Management Plan Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits Community interactions (including complaints) to be recorded and reported where appropriate 	
Dust	Excessive dust resulting in health impacts to neighbours	Possible	Major	High		Rare	Moderate	Medium			
Dust	Excessive dust resulting in biodiversity impacts	Possible	Minor	Medium		Unlikely	Minor	Low			
Surface Water	Unauthorised discharge of wastewater resulting in ecosystem damage to receiving waterway	Unlikely	Minor	Low		<ul style="list-style-type: none"> Access and haul roads designed with sufficient diversion drains and culverts to ensure stormwater is diverted away from receiving waterways Access and haul roads graded and orientated to slow the flow of stormwater Stormwater directed to sumps Surface water drainage line/waterway kept free of debris and diversion structures employed to direct stormwater away from them Erosion and sediment control structures employed to prevent the sedimentation of receiving waterway Exposed/disturbed areas minimised and revegetation undertaken progressively to reduce exposed/disturbed areas 	Rare	Minor	Low	Water quality as per EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan	<ul style="list-style-type: none"> Monitoring to be conducted in accordance with EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits
Surface Water	Localised flooding as a result of quarry impacts on surface water systems resulting in impacts to neighbours	Unlikely	Minor	Low			Rare	Minor	Low		
Surface Water	Sedimentation resulting in ecosystem damage to receiving waterway	Unlikely	Minor	Low			Rare	Minor	Low		
Groundwater	Groundwater contamination resulting in aquifer pollution	Unlikely	Moderate	Medium		<ul style="list-style-type: none"> Bulk hydrocarbons not stored on site Storage of hydrocarbons is audited during environmental inspections and opportunistic site visits 	Rare	Moderate	Medium	Water quality as per EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan	<ul style="list-style-type: none"> Monitoring to be conducted in accordance with EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits
Fire	Uncontrolled fire started or exacerbated as a result of quarry activities resulting in impacts to neighbours	Possible	Major	High	<ul style="list-style-type: none"> Plant and equipment is well maintained and fitted with spark arrestors and fire extinguishers No "hot works" undertaken on days of Total Fire Ban without written approval of RFS Liaison with RFS undertaken in times of extreme fire danger Refuelling and servicing conducted in designated areas 		Rare	Moderate	Medium		

Hazard	Pollution Incident (Material Harm)	Risk Assessment Prior to Pre-emptive Actions			Pre-emptive Actions	Risk Assessment After Pre-emptive Actions			Monitoring and Continuous Improvement	
		Inherent Risk				Residual Risk			Aspect to be Monitored	Details of Monitoring and Continuous Improvement
		Likelihood	Consequence	Risk Rating		Likelihood	Consequence	Risk Rating		
					<ul style="list-style-type: none"> Quarry activities undertaken in accordance with ENV-PLA-2124 DRLQ-002 Darlington Point Sand Pit Fire Management Plan 					
Fuels, Lubricants and Other Hazardous Materials	Spill resulting in ecosystem damage to receiving waterway	Unlikely	Minor	Low	<ul style="list-style-type: none"> Bulk hydrocarbons not stored on site Storage and handling of hydrocarbons is in accordance with AS 1940 and the Dangerous Goods Act 1975 Storage of hydrocarbons is audited during environmental inspections and opportunistic site visits 	Rare	Minor	Low	Water quality as per EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan	<ul style="list-style-type: none"> Monitoring to be conducted in accordance with EPL 21567 and ENV-PLA-2124 DRLQ-005 Darlington Point Sand Pit Surface Water and Groundwater Management Plan Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits
Fuels, Lubricants and Other Hazardous Materials	Spill resulting in terrestrial ecosystem damage	Unlikely	Minor	Low		Rare	Minor	Low	Area around plant and equipment	<ul style="list-style-type: none"> Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits
Pests, Weeds and Diseases	Infestation/outbreak resulting in ecosystem damage	Possible	Moderate	Medium	<ul style="list-style-type: none"> Pest plants and animals, and diseases managed in accordance with ENV-PLA-2124 DRLQ-003 Darlington Point Sand Pit Pest and Weed Management Plan Appropriately licensed personnel engaged to undertake pest plant and animal control Control of pest plant and animals, and diseases audited during environmental inspections and opportunistic site visits 	Unlikely	Minor	Low	Presence and control of pest plants and animals, and diseases as per ENV-PLA-2124 DRLQ-003 Darlington Point Sand Pit Pest and Weed Management Plan	<ul style="list-style-type: none"> Monitoring of presence and control of pest plants and animals, and diseases as per ENV-PLA-2124 DRLQ-003 Darlington Point Sand Pit Pest and Weed Management Plan Monitoring as part of environmental inspections (as per ENV-PRO-002 Environmental Risk Management Procedure) as well as opportunistic site visits

This risk assessment has been conducted utilising the following matrix.

Likelihood	Almost Certain	Medium	High	Very High	Very High	Very High
	Likely	Medium	Medium	High	Very High	Very High
	Possible	Low	Medium	Medium	High	Very High
	Unlikely	Low	Low	Medium	High	High
	Rare	Low	Low	Medium	Medium	High
		Insignificant	Minor	Moderate	Major	Critical
		Consequence				

Figure 1: Mawsons risk matrix

8 Pollutants

Bulk hydrocarbons are not stored on site. A small amount of diesel, oil and lubricants is retained as per the table below.

Location/tank	Pollutant	Maximum Volume
Fuel pod on Quarry Manager's light vehicle	Diesel fuel	200L
Storage shed	Oils/lubricants	60L

9 Safety Equipment

Figure 4 in Section 11 provides the locations of safety equipment described in the table below.

Equipment	Location
Fire extinguishers	In all buildings, on mobile equipment and in light vehicles
Spill kit	Storage shed
Personal Protective Equipment (PPE)	Provided and required to be used in accordance with WHS-PRO-017 Personal Protective Equipment (PPE) Procedure
First aid kit	Office/crib room

10 Communicating with Neighbours and the Local Community

Each neighbour within 1km north of the quarry will receive an in-person visit from Mawsons/Milbrae staff and a copy of this PIRMP with explanation of contact details for notifying Mawsons/Milbrae of complaints or concerns.

Specific messages in the event of a material pollution incident:

- Dust – persons in the affected area should close windows and doors and remain inside until advised otherwise by Mawsons/Milbrae or emergency services.
- Fire – implement fire safety plan and follow advice of emergency services
- Spill to waterways – avoid entering or fishing in downstream waterways
- Pests, weeds and disease – type of pest, weed or disease, location of outbreak, maintain vigilance

Minimising harm to persons on the premises

- Evacuate and assemble at the evacuation point at the front entry gate
- Initiate notifications, including emergency services
- Activate the emergency response plan

11 Maps and Site Plans

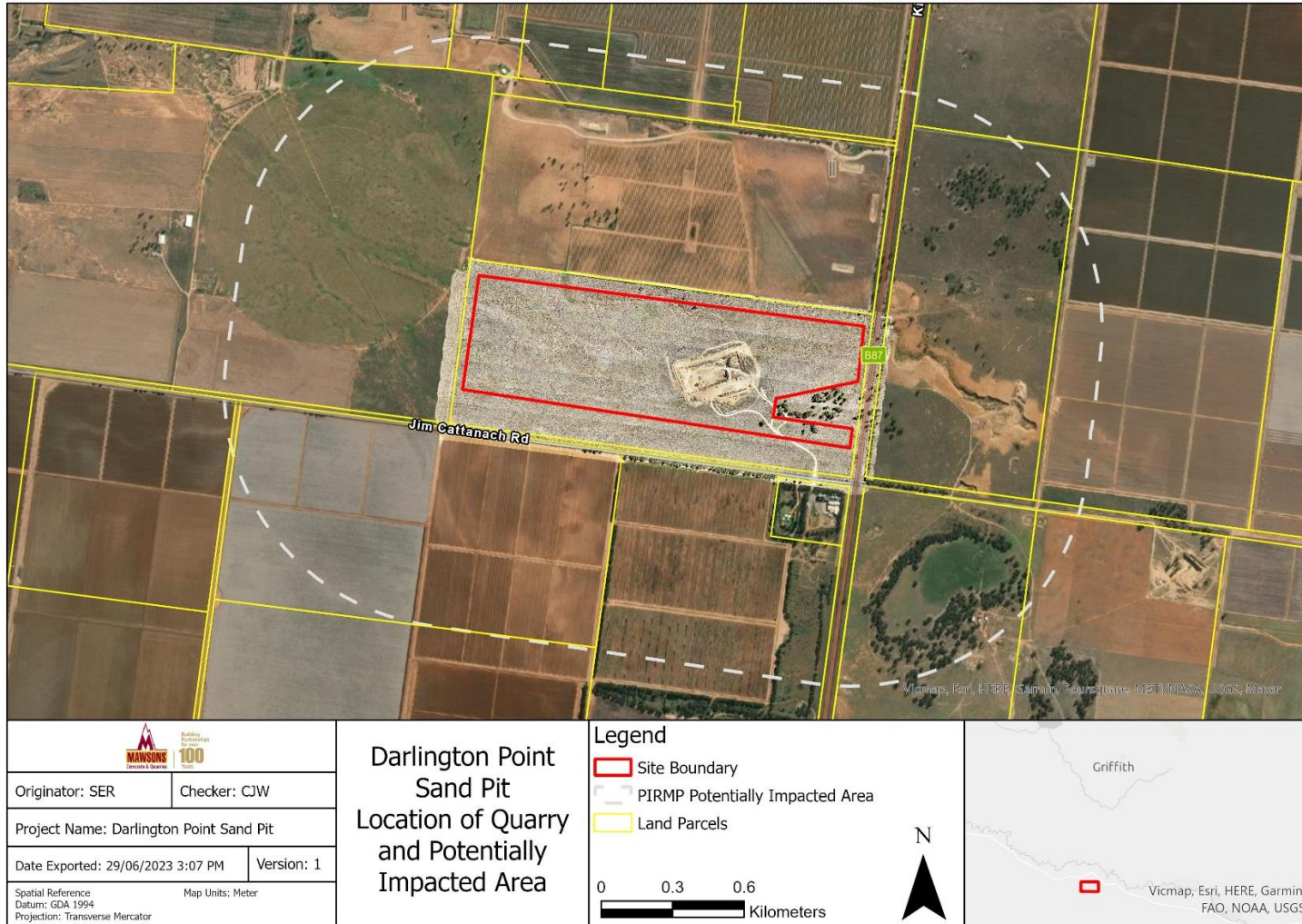


Figure 2: Location of quarry and potentially impacted area

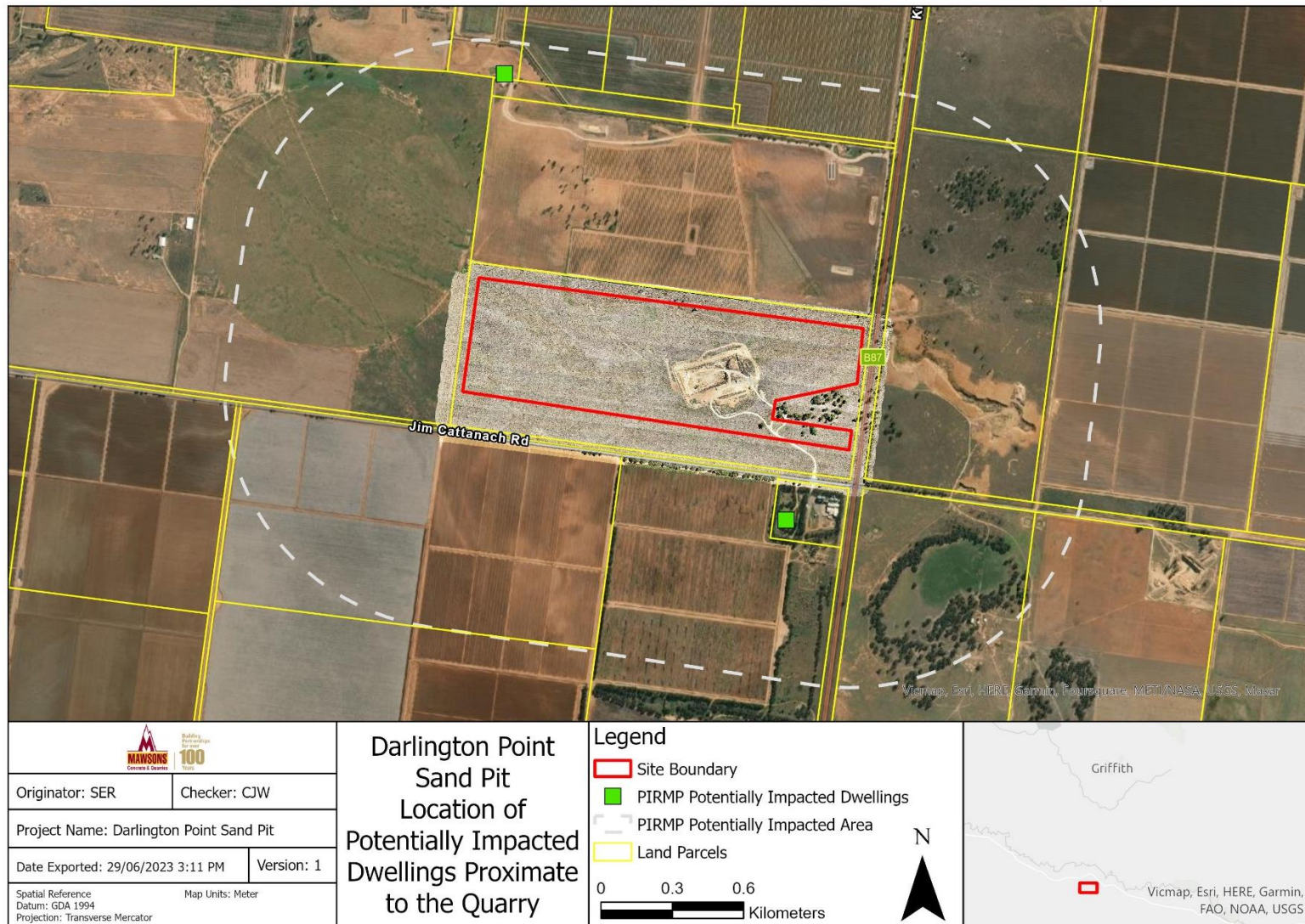


Figure 3: Location of potentially impacted neighbours proximate to the quarry



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community, Esri Community Maps Contributors, Spatial Services, VMap, © OpenStreetMap contributors, Microsoft, Bing, HERE, Garmin, EdLda, GEBCO, NASA, USGS

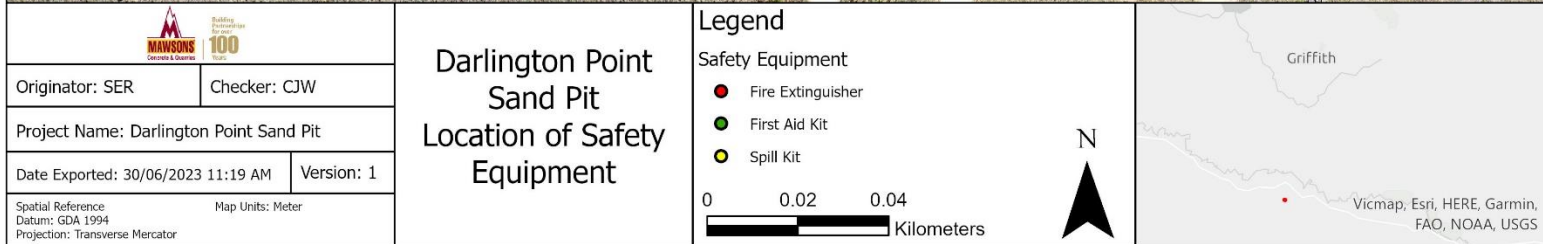


Figure 4: Location of safety equipment on site

12 Incident Response

Actions to be taken during or immediately after a pollution incident and the person responsible.

Note: Actions should only be taken if safe to do so.

		Immediate Response	Early Warning		Mitigation Actions		Communication Updates		Clean Up		Close Out		
		Quarry Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	
Incident (Material Harm)	Dust	Excessive dust resulting in nuisance to neighbours	Shut down dust generating plant and/or equipment	Text message to neighbours	Notify EPA	<ul style="list-style-type: none"> Identify source of excessive dust generation Activate dust suppression if not already active Redirect water cart to most heavily affected area 	<ul style="list-style-type: none"> Review weather data Assess clean up obligations 	Text message to neighbours	Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Text message to neighbours Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
	Dust	Excessive dust resulting in health impacts to neighbours	Shut down dust generating plant and/or equipment	Phone call to neighbours	Notify EPA	<ul style="list-style-type: none"> Identify source of excessive dust generation Activate dust suppression if not already active Redirect water cart to most heavily affected area 	<ul style="list-style-type: none"> Identify area of impact Assess clean up obligations Engage WHS team Engage other regulators and/or agencies as required 	Phone call to neighbours	Update EPA	Engage contractor to clean exteriors of impacted residences and rainwater tanks, re-fill tanks	Liaise with contractor to ensure clean up meets obligations	<ul style="list-style-type: none"> Phone call to neighbours Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
	Dust	Excessive dust resulting in biodiversity impacts	Shut down dust generating plant and/or equipment		Notify EPA	<ul style="list-style-type: none"> Identify source of excessive dust generation Activate dust suppression if not already active Redirect water cart to most heavily affected area 	<ul style="list-style-type: none"> Review weather data Assess clean up obligations 		Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA

		Immediate Response	Early Warning		Mitigation Actions		Communication Updates		Clean Up		Close Out	
		Quarry Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager
Surface Water	Unauthorised discharge of wastewater resulting in ecosystem damage to receiving waterway	Divert water to sump or away from sensitive receiving environment		Notify EPA	Collect water samples for analysis	Assess clean up obligations		Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
Surface Water	Localised flooding as a result of quarry impacts on surface water systems resulting in impacts to neighbours	Divert water to sump or away from sensitive receiving environment	Phone call to neighbours	Notify EPA	Collect water samples for analysis	<ul style="list-style-type: none"> Engage WHS team Engage other regulators and/or agencies as required Assess clean up obligations Review weather data 	Phone call to neighbours	Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Phone call to neighbours Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
Surface Water	Sedimentation resulting in ecosystem damage to receiving waterway	Divert water to sump or away from sensitive receiving environment		Notify EPA	<ul style="list-style-type: none"> Install sediment control devices Collect water samples for analysis 	Assess clean up obligations		Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
Groundwater	Groundwater contamination resulting in aquifer pollution	Divert contamination source to sump or away from sensitive receiving environment			Collect water samples for analysis	Assess clean up obligations		Update EPA	As directed by Environment and Compliance Manager	Liaise with Quarry Manager to ensure clean up meets obligations	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
Fire	Uncontrolled fire started or exacerbated as a result of quarry activities resulting in impacts to neighbours	<ul style="list-style-type: none"> Call 000 Stop Work Close Site 	Phone call to neighbours		Activate ENV-PLA-2124 DRLQ-002 Darlington Point Sand Pit Bushfire Management Plan	<ul style="list-style-type: none"> Engage WHS team Engage other regulators and/or agencies as required 	Phone call to neighbours		As directed by Environment and Compliance Manager	<ul style="list-style-type: none"> Assess clean up obligations Liaise with Quarry Manager to ensure clean up meets obligations 	<ul style="list-style-type: none"> Phone call to neighbours Report incident in O4i Provide information for investigation 	Support WHS team to conduct investigation
Fuels, Lubricants and Other Hazardous Materials	Hydrocarbon spill resulting in ecosystem damage to receiving waterway	Stop spill at the source		Notify EPA	Collect water samples for analysis	Assess clean up obligations		Update EPA	As directed by Environment and Compliance Manager	<ul style="list-style-type: none"> Assess clean up obligations Liaise with Quarry Manager to ensure clean up meets obligations 	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA

		Immediate Response	Early Warning		Mitigation Actions		Communication Updates		Clean Up		Close Out	
		Quarry Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager	Quarry Manager	Environment and Compliance Manager
	Fuels, Lubricants and Other Hazardous Materials	Hydrocarbon spill resulting in terrestrial ecosystem damage	Stop spill at the source	Notify EPA	Collect soil samples for analysis	Assess clean up obligations		Update EPA	As directed by Environment and Compliance Manager	<ul style="list-style-type: none"> Assess clean up obligations Liaise with Quarry Manager to ensure clean up meets obligations 	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation 	<ul style="list-style-type: none"> Conduct investigation Provide report to EPA
	Pests, Weeds and Diseases	Pest plant or animal infestation or disease outbreak resulting in ecosystem damage	Control traffic movements to prevent spread	Text message to neighbours	Notify Local Land Services (LLS)	Assess the extent or spread of the infestation or outbreak	<ul style="list-style-type: none"> Engage LLS for advice and develop a containment plan Engage other regulators and/or agencies as required 	Text message to neighbours	Update LLS	Engage suitably qualified contractor to conduct control or eradication works	Liaise with contractor to ensure clean up meets obligations	<ul style="list-style-type: none"> Report incident in O4i Provide information for investigation

13 Coordinating with Persons

Initial notifications and status updates to neighbours will be undertaken by the Quarry Manager or their delegate as described in Section 6.

Initial notifications to regulatory authorities will be undertaken by the Environment and Compliance Manager or their delegate.

Coordination with regulatory authorities and emergency responders that attend site will be managed by the Quarry Manager or their delegate.

Status updates to, regulatory authorities, and emergency responders that are not on site will be managed by the Environment and Compliance Manager or their delegate.

14 Training

Nature of Training	Training Objectives
Site Induction	Ensure that all personnel entering the site are aware of the hazards and control measures and any specific site conditions within the quarry
Emergency Response	During the testing of this PRIMP workers will have the opportunity to be trained on the emergency response equipment such as spill kit contents and use of these items. Formal fire extinguisher training.

15 Testing and Updating the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

The PIRMP testing form is hosted on the Mawsons intranet at https://mawsons.integralcs.com/inform/manageinformformrecord/subpageadd/form_id/300. Actions and updates to the PIRMP are also managed through the Mawsons intranet.

16 Document History

Version	Date	Amended By	Reason for Change
1	16/03/2023	B Dwyer	Document created