



Building
something
great

May 2025

Pollution Incident Response Management Plan

Grafton Quarry



Version 14: May 2025

Document Control Sheet

Version	Date	Prepared by	Approved By	Revision Details
01	20 Aug 2012			Document Created
02	21 Nov 2012			Document control sheet added Format Changes Added additional maps Chemical volumes stored onsite added Power Company Phone No updated
03	19 Nov 2013			Updated staff contact details Replaced reference map to reduce file size Added Immediate reporting contact sheet Updated ref. to Incident reporting SOP
04	25 Sep 2015			Updated staff contact details Formatting Changes Updated reference to HSEQ SOP Updated Risk Matrix to 5x5
05	19 Sep 2016			Updated Contact Details
07	11 Sep 2018			Updated Contact Details
08	9 Aug 2019			Updated Contact Details
09	13 Jan 2020			Updated Contact Details
10	10 Jan 2021			Updated contact details Formatting Changes
11	10 Jan 2022			Updated contact details Formatting Changes
12	20 Feb 2023			Updated contact details Formatting Changes
13	17 May 2024			Updated contact details Transferred to a new Boral Template
14	14 April 2025			Updated contact details in Section 9

Current Ver.	Date Implemented	PIRMP Test Schedule	Date for Next Review
14	April 2025	12 Months	April 2026

Contents

1.	Purpose	3
2.	Legislative Requirements	3
3.	Definition of Pollution Incident	4
4.	Scope	4
5.	Potential Polluting Substances	5
6.	Roles and Responsibilities	7
7.	Internal Pollution Incident Reporting	8
8.	External Pollution Incident Reporting	9
9.	Pollution Incident Authority Contact List.....	10
10.	Incident Response Training	10
11.	PIRMP Audit	11
12.	PIRMP Review	12
	APPENDIX 1 – RISK ASSESSMENT on POTENTIAL IMPACTS.....	13
	APPENDIX 2 – PIRMP RESPONSE ACTIONS.....	15
	APPENDIX 3 – GRAFTON QUARRY LOCATION MAP	19
	APPENDIX 4 – GRAFTON QUARRY REFERENCE MAP	20
	APPENDIX 5 – GRAFTON QUARRY – MAP OF AFFECTED AREAS.....	21
	APPENDIX 6 – POLLUTION INCIDENT NOTIFICATION LOG	22

1. Purpose

The purpose of the Grafton Quarry Pollution Incident Response Plan is to:

- Provide direction to the staff at Grafton Quarry in responding to pollution incidents at the Grafton operations.
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Clarence Valley Council, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident at Grafton Quarry by identifying key risks and planned actions to minimise and manage those risks.
- Detail the training requirements for this plan, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

2. Legislative Requirements

The specific requirements for a PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).
- if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act)

3. Definition of Pollution Incident

The definition of a pollution incident is:

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

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

- a. harm to the environment is material if:
 - i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - ii. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- b. loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Grafton Quarry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

4. Scope

This PIRMP must be followed by employees, contractors and visitors of Grafton Quarry, to assist in the early response to and reporting of a pollution incident.

5. Potential Polluting Substances

The main hazards to human health and the environment at Grafton Quarry are included in the following table.

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment)							
Site Name: Grafton Quarry					Responsible Person: Quarry Manager		Date: 14/04/2025
Name / description	Covered under Haz Chemicals/MSDS?	Amount stored	Location of storage	Map reference	Need for early warning ¹	Current controls	See Risk Ass & PIRMP Response Action
CHEMICALS/FUELS/LUBRICANTS (raw materials and products which can cause pollution)							
Diesel	Class 3	5,500 L	Diesel Storage Area	Ref No #1	N/A	<ul style="list-style-type: none"> Bunding PMP Training Spill Kits SOP Inductions Fire Fighting Equipment Security 	Incident #1
Oils/Solvents	Class 3	Packaged goods up to 1,500 L Waste Oil 2,500 L	Oil Storage Shed near Workshop	Ref No #3	N/A	<ul style="list-style-type: none"> Bunding PMP Training Flammable Cabinet Spill Kits Inductions Fire Fighting Equipment Security 	Incident #1
Lubricants, Gases	Class 2	Variable	Maintenance Workshop	Ref No #2	N/A	<ul style="list-style-type: none"> Fire Extinguishers Concrete Floor Enclosed Shed Containment Cages and Cabinets 	Incident #1
Oils/Fuel	Class 3	Variable	Plant and Equipment (Workshop area)	Ref No #2	N/A	<ul style="list-style-type: none"> PMP Training Spill Kits 	Incident #1

¹ Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment)							
Site Name: Grafton Quarry					Responsible Person: Quarry Manager		Date: 14/04/2025
Name / description	Covered under Haz Chemicals/MSDS?	Amount stored	Location of storage	Map reference	Need for early warning ¹	Current controls	See Risk Ass & PIRMP Response Action
						<ul style="list-style-type: none"> • SOP • Inductions • Fire Fighting Equipment • Security 	
MATERIALS (eg stockpiles, silos, bulk solids etc)							
Product Stockpiles	N/A	Variable	Dedicated on site	Ref No #8 & #9	N/A	<ul style="list-style-type: none"> • Water sprays • Water Cart • Maintain manageable levels • Security 	Incident #2
AQUEOUS (eg dams, wastewater tanks, other water storage area)							
Water Storage Pits (Sediment)	N/A	Variable		Ref No #6	N/A	<ul style="list-style-type: none"> • Continue to use for dust suppression • Ensure pumps are maintained through scheduled maintenance • Discharge monitoring 	Incident #3
Storm Water Drains	N/A	Variable	Site	N/A	N/A	<ul style="list-style-type: none"> • Straw Bales • Rubber and Earthen Berms • Audits and Inspections 	Incident #3

6. Roles and Responsibilities

Position	Responsibility
<i>Employees and Contractors</i>	<p>Following the procedures outlined in the PIRMP and related documents.</p> <p>Immediately alerting Supervisor or Team Leader of any environmental incidents or near-misses.</p>
<i>Team Leaders / Front Line Supervisors</i>	<p>Following the procedures outlined in the PIRMP and related documents.</p> <p>Immediately alerting Site/Quarry Manager or, in case of their unavailability, Environmental Representative of any potentially material environmental incidents or near-misses.</p> <p>Conducting incident investigations.</p>
<i>Site / Operations Manager</i> <i>and/or</i> <i>Site Environmental Business Partner</i> <i>and/or</i> <i>Senior Environmental Business Partner</i>	<p>Authorisation of the PIRMP.</p> <p>Administration, maintenance and implementation of the PIRMP.</p> <p>Assessing whether the incident has caused or threatens “material environmental harm” and, if so, immediately notifying all Appropriate Regulatory Authorities.</p> <p>Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact.</p>

7. Internal Pollution Incident Reporting

Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the Site/Operations Manager, or Environmental Representative.

In cases where “material harm” level cannot be immediately assessed or insufficient information comes to hand on the severity of the incident, the general advice is to err on the side of caution and notify the Relevant Authorities with a qualification that the situation could not yet be fully assessed.

Until further notice the following procedure needs to be followed:

1. When a pollution incident occurs, a person who has become aware of it must immediately bring it to the attention of his/her immediate Supervisor or Manager.
2. If necessary, first ring “000” for Emergency Services.
3. At least one of the following personnel must be contacted immediately:

Name	Function	Phone number	Mobile number
██████████	██████████████████	██████████	██████████
██████████	██████████████████	██████████	██████████
██████████	██████████████████		██████████
██████████	██████████████████	█	██████████
██████████	██████████████████	██████████	██████████

4. The Quarry Manager or in case of his unavailability one of the Senior Management personnel listed above, is to immediately notify all Appropriate Regulatory Authorities specified in Section 9.
5. In borderline situations, where the exceedance of the trigger level of “material harm” of a pollution incident may not be clear, a quick assessment including consultation with Boral environmental personnel should be undertaken to help the decision whether to notify or not.
6. Boral’s Senior Management including environmental team members must be informed promptly of the fact of immediate notification to the Authorities.

8. External Pollution Incident Reporting

As the legislation requires that notification must be done immediately upon becoming aware of the pollution incident, it is unlikely that a detailed picture will be available for reporting. Notwithstanding, it seems that some of the Government Authorities prepared a detailed questionnaire which is being filled in at the time of this initial notification. Under the stress of incident handling it could be easy to provide a hasty, inaccurate estimate of the situation when answering these questions.

Therefore, the notification should be restricted to the facts known and nothing should be assumed or guessed. The details will be provided to the asking Authority later when more information comes to hand.

The initial notification should include as much of the following information (if known) as possible:

- i. **location and time of the pollution incident**
- ii. **type of the incident (spill, fire, unlicensed harmful discharge, etc)**
- iii. **assessed level of incident gravity: “it seems to be...” (e.g. “a relatively minor spill”; “major fire”, “explosion limited to one building”, etc.)**
- iv. **whether the Emergency Services have been required to attend.**

Unless known for a fact, the answers to other questions should be politely deferred until a better assessment of the situation can be made.

The Boral person who is responsible for notifying the Authorities (Site/Operations Manager or Environment Manager) about the incident must prepare a Notification Log (a suitable form is attached) with the details of time of notifications and the persons who took to the call. The Authorities are expected to log the calls.

Notification of all Appropriate Government Authorities (at least 5 entities) may take considerable time. Delays may be experienced connecting to the right person or no contact may be possible after hours. All such instances should be recorded in the Notification Log.

9. Pollution Incident Authority Contact List

Government Authority – Compulsory Notifications	Emergency Notification Phone Number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	000 or <u>02 9265 2999</u> if not an emergency
Clarence Valley Council	BH 6643 0200 AH 6643 0200
Public Health Unit (Lismore NC AHS)	BH 6620 7585 AH 0428 882 805 (NSW Public Health Access line BH: 1300 066 055)
WorkCover Authority of NSW	131 050 Company ABN asked: 51 000 187 002
Government Authority – ring if relevant	Emergency notification phone number
Police & Ambulance	000
Roads and Maritime Services (road spills)	13 17 00
NSW Office of Water	1300 081 047 (BH)
Bush Fire Control Officer	Clarence Valley Control Centre: 02 6644 5135 (BH)
Poisons Information Centre	13 11 26
Essential Energy (power line emergencies)	13 20 80

Communication with the local community may also be undertaken depending on the circumstances of the pollution incident. Grafton Quarry would consider the following options for providing Early Warning and ongoing information to the community on pollution incidents:

- Direct phone contact with any local residents directly impacted by the pollution incident.
- Letter Box drops of incident information and site contacts to local residents impacted by the pollution incident.
- The inclusion of incident details within the relevant Quarry Community Newsletter

The Stakeholder Relations Manager can assist in the process of communicating with the community, as per the Stakeholder Engagement Plan for the site.

10. Incident Response Training

Grafton Quarry will implement the Pollution Incident Response Management Plan by training or providing information to relevant employees and contractors in relevant areas of the Plan.

Training or information will be provided on the following;

- The contents and intent of this PIRMP,

- The roles and responsibilities of site staff in relation to this PIRMP
- Spill response procedures;
- General environmental awareness; and / or
- Hazardous materials awareness.

11. PIRMP Audit

The objectives of an audit are to maintain compliance with this plan. Internal audits of this Plan will be undertaken every 3 years.

Routine testing of the plan will be conducted annually, and can be completed through the following methods:

- Simulated environmental emergency, or
- Desktop simulations.

12. PIRMP Review

Revisions are to be coordinated by the Site Manager and Environmental Representative.

The objectives of a review are:

- To maintain compliance with the statutory requirements, and
- To identify opportunities for improvement in the Plan, and reduce the risk to human health and the environment.

A) EVENT BASED

Events which may trigger a review of this Plan or its associated documents include:

- Within 1 month of reporting to the nominated parties in accordance with the plan, after a pollution incident, or
- Modification/Improvement to the system.

B) TIME BASED

Grafton Quarry will review this management plan routinely every 12 months. The Plan review will include:

- This Document, and
- Legislation, Approval and Licence changes.

Reviews of the PIRMP are summarised below:

Test Date	Version Tested	Incident Test Details	Drill Team Lead
14/04/2025	V12	Desktop Review of PIRMP	Glenn Cook

APPENDIX 1 – RISK ASSESSMENT on POTENTIAL IMPACTS

Hazard and Likelihood Risk Assessment and Corrective Control Measures								
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Likelihood	Risk	Impact on neighbours ²	Control Measures Corrective Action Coverage under other Plans	Responsible Person	Action Date
Diesel	Incident #1 Uncontrolled loss of Diesel or other hydrocarbon based products that could result in material harm to the environment or human health	1	1	L	N/A	Consequence: (Incidental): Failure resulting in loss of all or substantial volume of tanks would be captured entirely by existing primary bund with no release to soil or water. Likelihood: (Rare): Tanks are located in a dedicated bund. Due to the location of the tank damage is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity with low risk of failure through corrosion.	As per PIRMP action plan	When required
Product stockpiles	Incident #2 Excessive airborne dust from stockpiled material, mobile plant or traffic areas causing material harm to the environment or significant impact to the community.	1	3	L	Y	Consequence: (Incidental): Excessive dust from stockpile during high winds causing nuisance to surrounding area. Likelihood: (Possible): Stockpiles are maintained to a manageable level on a monthly basis. Use of water sprinklers and water cart onsite during windy periods. Site has wind break/dust walls surrounding site.	As per PIRMP action plan	When required
Sediment Dams	Incident #3 Uncontrolled release of sediment laden water from storages causing material harm to the environment	2	2	L	N/A	Consequence: (Minor): Catastrophic failure of one or more sediment pits are likely to result in off-site impacts to water courses which would predominantly reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be significant. Likelihood: (unlikely): Pits are frequently monitored and inspected for levels and integrity.	As per PIRMP action plan	When required

² If the incident may impact on neighbours then it will need to trigger the early warnings assessment and actions

Hazard and Likelihood Risk Assessment and Corrective Control Measures

Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Likelihood	Risk	Impact on neighbours ²	Control Measures Corrective Action Coverage under other Plans	Responsible Person	Action Date
						Note: For PIRMP purposes overflow events during extreme wet weather will be reported under POEO Licence obligations and not Immediate Reporting.		

APPENDIX 2 – PIRMP RESPONSE ACTIONS

Incident No 1

Incident #1	<p>Uncontrolled loss of Diesel or other hydrocarbon based products that could result in material harm to the environment or human health</p> <p>Actions Required:</p> <ul style="list-style-type: none"> • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bunds are capturing full volume of diesel • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents • Area to be restricted to Incident Response Personnel • Ensure spill kit available for any release from bund • If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination. • Repair/replace tanks • Refuel tanks <p>Inspect bund for ongoing serviceability</p>
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	<ul style="list-style-type: none"> • Quarry Manager • Call service provider (Quarry Manager) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Quarry Manager)
Scale of incident	Incident would be restricted to Diesel storage area with minimal external impact, however, potential for bund overflow or failure may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Quarry Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	<p>Internal:</p> <ul style="list-style-type: none"> • Quarry Manager • Environment Manager &/or HSE Advisor <p>External mandatory:</p> <ul style="list-style-type: none"> • Immediate Reporting Contact Sheet to be used <p>External non-mandatory: N/A</p>
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.

Reporting and re-
preparedness

See Incident Notification SOP (GRP-HSEQ-3-02)

Public Version

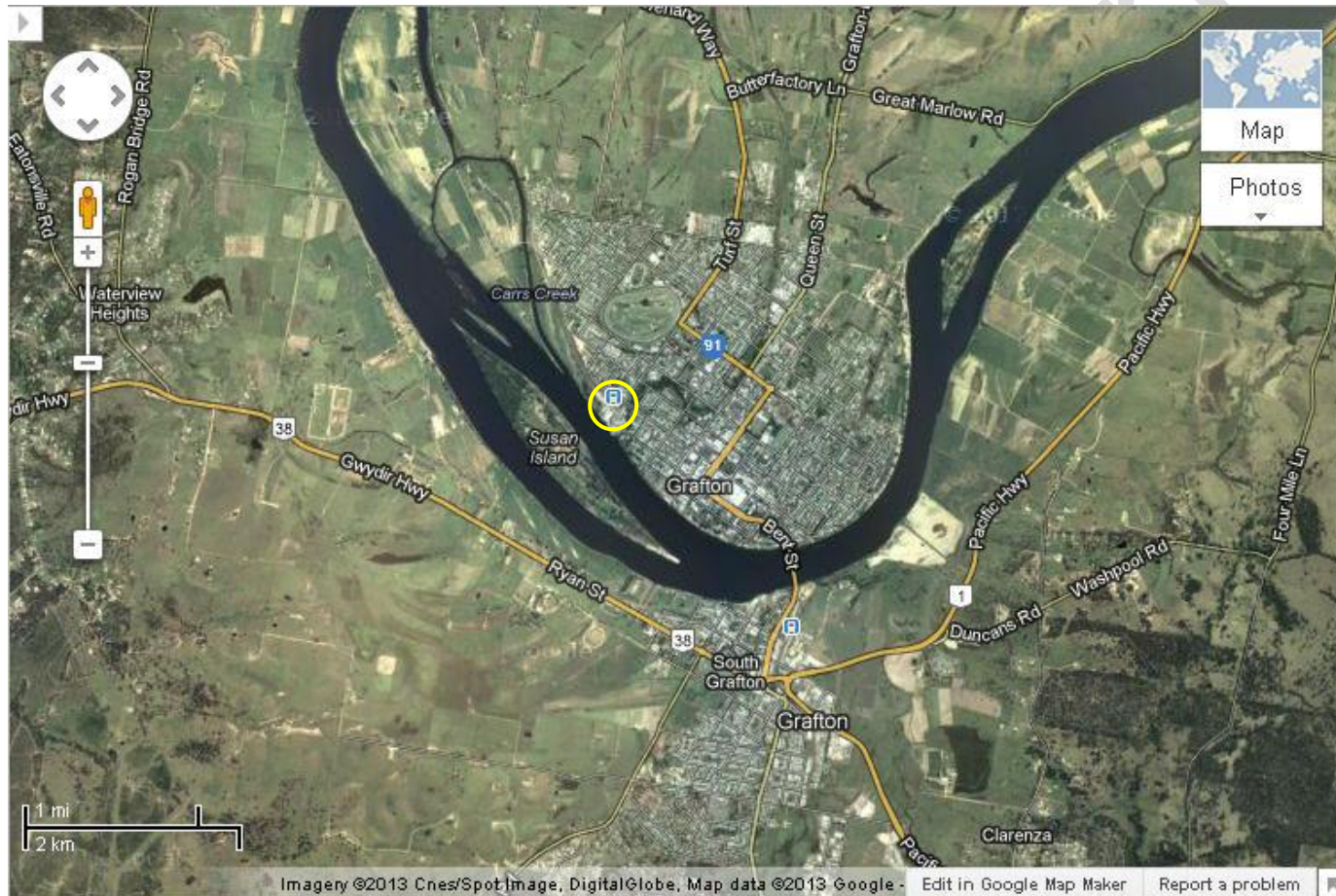
Incident No 2

Incident #2	<p>Excessive airbourne dust from stockpiled material, mobile plant or traffic areas causing material harm to the environment or significant impact to the community.</p> <p>Actions Required:</p> <ul style="list-style-type: none"> • Employees, Contractor/Visitor to notify site representative of issue immediately. (induction) • Daily monitoring to be undertaken to assess weather and site conditions • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Dust suppression activity to commence immediately on stockpiles
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	<ul style="list-style-type: none"> • Quarry Manager • Call service provider (Quarry Manager) • Spill Kit manager (Supervisor) • Periodic inspections and update reporting of site and bund (Quarry Manager)
Scale of incident	Incident would be localised to the area surrounding stockpile area, with minimal external impact.
Evacuate	Only if fire or explosion potential exists. Quarry Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	<p>Internal:</p> <ul style="list-style-type: none"> • Quarry Manager • Environment Manager &/or HSE Advisor – Enviro Representative <p>External mandatory:</p> <ul style="list-style-type: none"> • Immediate Reporting Contact Sheet to be used <p>External non-mandatory: N/A</p>
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Service Provider to dispose of diesel and advise on required clean-up.
Reporting and re-preparedness	See Incident Notification SOP (GRP-HSEQ-3-02)

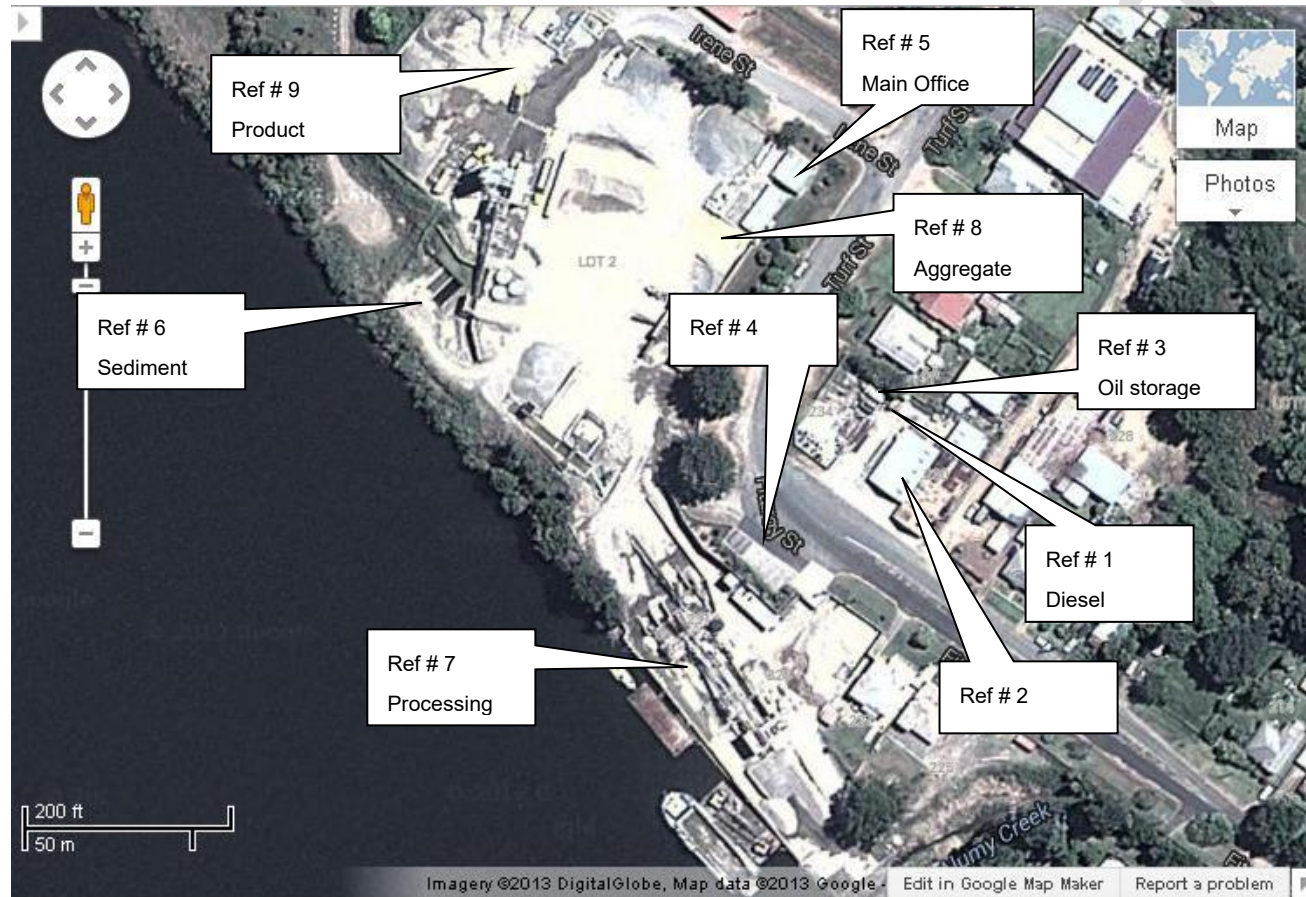
Incident No 3

Incident #3	<p>Uncontrolled release of sediment laden water from storages causing material harm to the environment</p> <p>Actions Required:</p> <ul style="list-style-type: none"> • Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) • Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) • Contact local neighbours if going to be inundated by water • Area to be restricted to Incident Response Personnel • If any release from site onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination if any • Contact local contractor to rebuild dams immediately
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	<ul style="list-style-type: none"> • Quarry Manager • Call service provider (Quarry Manager) • Periodic inspections and update reporting of site and bund (Quarry Manager)
Scale of incident	Catastrophic failure of one or more sediment pits are likely to result in off-site impacts to water courses which would predominantly reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be significant.
Evacuate	Only if flood potential exists. Quarry Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	<p>Internal:</p> <ul style="list-style-type: none"> • Quarry Manager • Environment Manager &/or HSE Advisor – Enviro Representative <p>External mandatory:</p> <ul style="list-style-type: none"> • Immediate Reporting Contact Sheet to be used <p>External non-mandatory: N/A</p>
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Consultants to be contacted to advise on required clean-up.
Reporting and re-preparedness	See Incident Notification SOP (GRP-HSEQ-3-02)

APPENDIX 3 – GRAFTON QUARRY LOCATION MAP



APPENDIX 4 – GRAFTON QUARRY REFERENCE MAP



APPENDIX 5 – GRAFTON QUARRY – MAP OF AFFECTED AREAS



APPENDIX 6 – POLLUTION INCIDENT NOTIFICATION LOG

Person undertaking notification (Name/Function):			
Date and time when first become aware of the incident:			
Incident type:			
Comments:			

Initial immediate notification log				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of initial communication:				

Person undertaking notification (Name/Function):		
Date and time when additional information become available:		
Comments:		

Immediate notification of further pertinent information (if applicable)				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of additional communication				

Grafton Quarry – Immediate Reporting Contact Sheet

INTERNAL NOTIFICATIONS			
Name	Function	Phone number	Mobile number

EXTERNAL NOTIFICATIONS	
Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire and Rescue NSW (FRNSW)	000 or <u>02 9265 2999</u> if not an emergency
Clarence Valley Council	BH 6643 0200 AH 6643 0200
Public Health Unit (Lismore NC AHS)	BH 6620 7585 AH 0428 882 805 (NSW Public Health Access line BH: 1300 066 055)
WorkCover Authority of NSW	131 050 Company ABN asked: 51 000 187 002

NOTE: A full listing of contact phone numbers of other potentially relevant government agencies is included in the PIRMP.