Pollution Incident Response Management Plan

Boral Cement Clyde

Version 15: 20 December 2025

Document Control Sheet

Version	Change Date	Prepared By	Approved By	Summary of Change
Rev.0	30 August 2012	Alex Wnorowski	Alex Wnorowski	Final draft approved

Rev.1	19 December 2012	Alex Wnorowski	Alex Wnorowski	New Fire & Rescue NSW number for Pollution Incident notifications (replacing calls to 000)
Rev.2	1 September 2013	Alex Wnorowski	Alex Wnorowski	Changes reflecting company restructure.
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Contents

1. General Information 4
   1.1. Purpose 4
   1.2. Legislative requirements 4
   1.3. Definition of a pollution incident 6

2. Risk Assessment and Preventive Actions 8
2.1. Environmental Registers 8
2.2. Harm Reduction 14
2.2.1. Prevention 14
2.2.2. Maintenance 14
2.3. Site Maps 14
2.3.1. Safety Equipment 18
3. Immediate Notifications 19
3.1. Internal Notification 19
3.2. Notification of Government Authorities 19
3.3. Notification of Neighbours 21
4. Pollution Incident Emergency Response 22
5. PIRMP Training Testing and Review 26
6. Appendix A Pollution Incident Notification Form 27
7. Appendix B Immediate Notification Contact Numbers 29

1. General Information

1.1. Purpose

The purpose of the Boral Cement Clyde Pollution Incident Response Plan (PIRMP) is to:

- Provide clear direction on responding to pollution incidents at Boral Cement Clyde.
- Ensure the immediate communication of this PIRMP enactment to staff, neighbours and relevant authorities.

- Minimise and control the risk of a pollution incident at Boral Cement Clyde.
- Detail the requirements for this plan, including training, review, testing, public and internal display and implementation responsibilities.

This plan is available onsite and publicly displayed on the website. https://www.boral.com.au/our-commitment/environmental-reporting.

1.2. Legislative requirements

The specific requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Division 1, Part 5.7A of the POEO Act and Chapter 4 of the Protection of the Environment Operations (General) Regulation 2022. Table 1 summarises the location of these requirements in the document.

Table 1 Summary of Legislative Requirements of a PIRMP

Section/Clause	Requirement	Location in PIRMP
	Part 5.7A POEO Act 1997	
147	(1) For the purposes of this Part— (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. (2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.	Section 1.3
150	(1) (1) The relevant information about a pollution incident required under section 148 consists of the following— (a) the time, date, nature, duration and location of the incident, (a) harm to the environment is material if 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), (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. (2) (2) The information required by this section is the information known to the person notifying the incident when the notification is required to be given. (3) (3) If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.	Section 3 Section 3.2 Section 3.2

153A	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.	EPL 947 and this document
153C	A pollution incident response management plan must be in the form required by the regulations and must include the following— (a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to— (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and (iii) any persons or authorities required to be notified by Part 5.7, (b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution, (c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made, (d) any other matter required by the regulations.	 Section 3, Appendix A and B Section 3.3 Appendix B Section 3.1 Appendix B Section 3 Appendix B Section 4 Section 4 Section 1.2
153D	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	Section 1.1
153E	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations	Section 5
153F	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part	Section 3 and 4
72 (a)	a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),	Table 2
72 (b)	the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,	Table 3
72 (c)	details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of the relevant activity,	Section 2.2, Table 3
72 (d)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Table 2, Section 2.1
72 (e)	the maximum quantity of a pollutant likely to be stored or held at particular locations, including underground tanks, at or on the premises to which the licence relates,	Table 2, Section 2.1
72 (f)	a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident,	Table 2, Section 2.2.3 Section 2.2.4

72 (g)	The names, positions and 24-hour contact details of individuals who— are responsible for activating the PIRMP, and are authorised to notify relevant authorities under the Act, section 148, and are responsible for managing the response to a pollution incident,	Section 3.1, Appendix B
72 (h)	the contact details of each relevant authority referred to in the Act, section 148,	Section 3.2, Appendix B
72 (i)	details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near the premises to which the licence relates or where the scheduled activity is carried on,	Section 2.2, Section 3.3
72 (j)	the arrangements for minimising the risk of harm to persons who are on the premises or who are present where the scheduled activity is being carried on,	Section 2.2
72 (k)	a detailed map, or set of maps, showing the location of the premises to which the licence relates, the surrounding area likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of stormwater drains on the premises,	Section 2.2.3
72 (l)	a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,	Section 2.2, Table 3
72 (m)	the nature and objectives of a staff training program in relation to the PIRMP,	Section 5
72 (n)	the dates on which the PIRMP has been tested and the name of the person who carried out the test,	Section 5
72 (o)	the dates on which the PIRMP is updated,	Document Control Sheet
72 (p)	the way in which the PIRMP must be tested and maintained.	Section 5

1.3. Definition of a Pollution Incident

The dictionary of the POEO Act defines pollution as either ‘water pollution’, ‘air pollution’, ‘noise pollution’ or ‘land pollution’. It goes on to provide definitions for each of these types of pollution.

As per the POEO Act, ‘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.’

Notification is required if a pollution incident causes or threatens to cause **‘material harm to the environment**’. Material harm 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.'

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).

Examples would include events such as highly alkaline water escaping catchments after a heavy rain event, dust severely impacting on a neighbour's property or a large hydrocarbon spill that cannot be contained. Weather conditions and geographic features can increase the risk of a pollutant spreading throughout the environment, increasing the risk of material harm being triggered.

Industry is required to report pollution incidents immediately to the EPA, NSW Health, NSW emergency services, Safework NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

There are new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.

2. Risk Assessment and Preventive Actions

2.1. Environmental Registers

Potential environmental pollutants are summarised in a site risk register entitled "Environmental Aspects and Impacts, located in *Sharepoint AUS_HSE_ECement>Documents>Cement Sites>Depots>Clyde>Green Folder.* This document considers; Aspect, Impact, Controls and Improvements for the site's known environmental hazards in the following areas:

- Fugitive dust emissions from plant and mining areas
- Spills of liquids (e.g. diesel, oil) or powdered solid materials (e.g. Lime), potentially leaving the site. Large spill of powdered solids may result in significant dust nuisance or lead to deposition of significant quantities of high pH particulate matter in the natural water courses.
- Fire
- Blasting/Explosives
- LPG Incidents.

Boral Cement Clyde has a Hazardous Substance and Dangerous Goods Register located at the site office.

Each Hazardous Substance/Dangerous good has an associated Safety Data Sheet which contains a description of the hazards to both human health and the environment. A current set of SDS's is available through the intranet application; ChemAlert http://vabndc09:8080/chemalert/ and are

available in hard copy in the Lab. Safety Data Sheets are displayed in all areas which use or store products of this nature. Supporting signage is also displayed where required.

Hazardous Chemicals and Dangerous Goods are managed onsite in line with the *Standard/Protocol for Hazardous Chemicals and Dangerous Goods GRP-HSEQ-4-04*, which addresses:

Determining the level of risk via;

- SDS;
- Product labelling;
- Hazardous Substances and Dangerous Goods register;
- Risk Assessments;
- Controlling the risk via;
- Purchasing controls;
- Storage Handling and transportation;
- Storage Cabinets;
- Transporting and handling Hazardous substances and Dangerous Goods;
- PPE;
- Atmospheric Monitoring and Health Surveillance;
- Dangerous Goods Manifest;
- Dangerous Goods Audit;
- Hazardous Substance Inspections;
- Appropriate disposal;
- Spill prevention and management.

To satisfy the requirements of Clause 72 (d) (e) and (f) an initial assessment of polluting substances is detailed in Table 2. A risk assessment detailed as per requirements of Clause 72 (a) and (b) is detailed in Table 2.

Table 2 List of Polluting Substances and Storage

Table 2: LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment located in Table 3)							
Site Name: Boral Cement Clyde					Responsible Person: Site Manager	Date: 20/12/25	
Description of Hazard	Covered under Haz Chemicals/ MSDS?	Estimated Amount stored (amounts vary depending on operations)	Location of storage	Map reference	Likelihood of Impact on neighbours	Current controls/safety equipment (Pre-emptive Actions)	See Risk Assessment (see Below)
CHEMICALS/FUELS/LUBRICANTS (diesel, Oils, lubricants etc)							
Uncontrolled loss of Diesel or other hydrocarbon products that could result in material harm to the environment or human health	Class C1	Mobile Plant Please note that exact volumes may vary dependent on operations and are estimates only	Diesel Storage tank at Go-line and Workshop	Figure 2. Reference 2	LOW Only if substances enter waterways and is transported off-site	Self-bunded tank Bunding Lined filling area PMP Training Spill Kits Flammable Cabinets SOP's Inductions Fire Fighting Equipment Security	Incident #1
AIRBOURNE DUST (eg stockpiles, silos, Haul Roads etc)							
Excessive airborne dust from stockpiled material, mobile plant or traffic areas causing material harm to the environment or significant impact to community	N/A	Overburden, Product Stockpile, Rail Bins, Silo, Stack Emissions and haul roads	Dedicated on site stockpile areas and four silos	Figure 2 reference 2	LOW Only if excessive dust is spread off-site during high winds	Water sprays Water Cart Maintain manageable levels Security Reduced speed Weather forecast early notification PMP	Incident #2
AQUEOUS (eg dams, wastewater tanks, other water storage area)							

Table 2: LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE: INITIAL ASSESSMENT (all Chemicals listed in this sheet are to be subjected to a risk assessment located in Table 3)							
Site Name: Boral Cement Clyde					Responsible Person: Site Manager	Date: 20/12/25	
Description of Hazard	Covered under Haz Chemicals/ MSDS?	Estimated Amount stored (amounts vary depending on operations)	Location of storage	Map reference	Likelihood of Impact on neighbours	Current controls/safety equipment (Pre-emptive Actions)	See Risk Assessment (see Below)
Uncontrolled release of sediment laden water from storage dams causing material harm to the environment	TSS, EC	Variable depending on operations	Dedicated Sediment Basins within operational area	Figure 10	LOW Only if excessive sediment enters waterways and is transported off-site during significant rain events	Continue to use for dust suppression Ensure pumps are maintained through scheduled maintenance Discharge monitoring Straw Bales Rubber and Earthen Berms Audits and Inspections Drain Mate	Incident #3

Table 3 Risk Assessment of Incidents and Corrective Control Measures

Table 3 Hazard and Likelihood Risk Assessment and Corrective Control Measures								
Site: Boral Cement Clyde					**Responsible Person: Les Longhurst**		**Review Date: 14 October 2022**	
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Consequence	Likelihood	Risk	Factors which could increase risk	Residual Risk after implementation of controls. (See Table 2 for list of current controls).	Responsible person	Action date
Diesel/ Hydrocarbons	Incident #1 Uncontrolled loss of Diesel or other hydrocarbon products that could result in material harm to the environment or human health	2	2	L4	Dry, windy conditions (increase fire danger) or heavy rain/flood conditions (will increase potential for spill to spread to catchment drainage areas)	Consequence: (Minor 2): 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: (Unlikely 2): Diesel Tanks are self bunded double walled fuel tanks. Due to location of tank, damage to tanks is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity with low risk of failure through corrosion. Drain valve, hoses and refuelling equipment are maintained in good structural integrity with low risk of failure The drain valve is locked at all times.	As per PIRMP action plan	When required

						Risk Assessment = Minor 2 Vs Unlikely 2 = L4		
Airborne dust	Incident #2 Excessive airborne dust from stockpiled material, mobile plant or traffic areas causing material harm to the environment or significant impact to community	2	2	L4	Dry, windy conditions (increase wind erosion and dust transport). Summer months with long periods of extended dry conditions.	Consequence: (Minor 2): Excessive dust from stockpile during high winds causing nuisance to surrounding area. Likelihood: (Unlikely 2): Stockpiles are maintained to a manageable level on a monthly basis. Use of water sprinklers and water cart onsite during windy periods. Extensive land reserves act as buffer land from surrounding communities. Surrounding land is rural with sparse distribution of neighbours. Risk Assessment = Minor 2 Vs Unlikely 2 = L4	As per PIRMP action plan	When required
Sediment laden stormwater	Incident #3 Uncontrolled release of sediment laden water from storage dams causing material harm to the environment	2	2	L4	Extended periods of rain increase the risk. Late Summer/early Autumn is typically the wettest part of the year on site.	Consequence: (Minor 2): Failure of one or more sediment dams 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 2): Dams are frequently monitored and inspected for levels and integrity. Risk Assessment = Minor 2 Vs Unlikely 2 =L4 **Note:** For PIRMP purposes overflow events during extreme wet weather will be reported under POEO Licence obligations and not Immediate Reporting.	As per PIRMP action plan	When required

2.2. Harm Reduction

2.2.1. Prevention

The risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out is reduced by measures outlined in “GRP-HSEQ-8-07 Spill Management”. These measures include:

- Placement of spill-risk facilities away from sensitive environments (sufficient to allow for effective intervention prior to pollution occurring in the event of a spill);
- Use of secondary spill containment facilities such as bunding around all storage tanks and other areas where hazardous substances are stored;
- Ensuring that areas where risky activities such as storage tank/silo loading are undertaken are bunded and sealed;
- Ensuring drainage structures can be sealed to halt passage of spilt fluids or powdered solids;
- Training of employees and contractors in good environmental practice;
- Ensure that the local deluge procedure includes possible overflows and excursions off-site;
- Toolbox talk describing weather conditions. Risky activities can be avoided or managed.

The bunded areas must be capable of preventing the migration of any spillage or leakage to the surrounding environment. The requirement for bunding is relative to the level of risk and type of area. Bunding specifications are summarised in Australian Standard AS 1940:2004.

2.2.2. Maintenance

All bunds, silos, tanks, pipe-work and stores/magazines are inspected monthly and at least annually for signs of damage. Any defect in the bund wall or lining is repaired immediately using appropriate techniques. Damage to the tank or transfer hoses is dealt with immediately to prevent failure.

Any liquid in the bund must be promptly removed in an appropriate manner – usually as contaminated matter. Do not allow spilt liquid or stormwater to remain in the bund – it may accumulate and lead to overflowing. Rainwater entering the sump or bunded area should be regarded as potentially contaminated and must be disposed of in an authorised manner.

Any accumulated debris should be promptly removed and disposed of in the correct manner.

2.2.3. Site Drainage

Surface water is managed through a concrete drainage system and a collection dam located on the eastern boundary. An additional safety measure in case the dam overflows in a high rainfall, is an earth-bunded collection area at the northern boundary of the site where the water would flow via the outer drainage system.

However the main measure to prevent dam overflow is the removal of excess water. If water samples are collected and tested in advance and indicate that the dam water can be classified as “non-controlled aqueous liquid waste, water can be used for irrigation on site. In case there is no testing or test results indicate classification as “Controlled liquid waste” excess water has to be removed off-site by a licensed contractor. Current contractor is Transpacific Industries.

A flowchart of dam water overflow event management is presented in Figure 6 of the Clyde Environmental Management Plan.

In addition, there are stormwater drains near the loading bay from where stormwater flows directly off site. In case of a cement spill, the material could potentially be carried off site. To prevent this from occurring, heavy drain mats have been purchased and staff trained to cover the grates in case of any cement spill. These are kept in containers positioned by each stormwater grate.

2.2.4. Site Maps

An aerial map overleaf Figure 1 shows the location of the premises to which the licence relates together with the current environmental monitoring points.

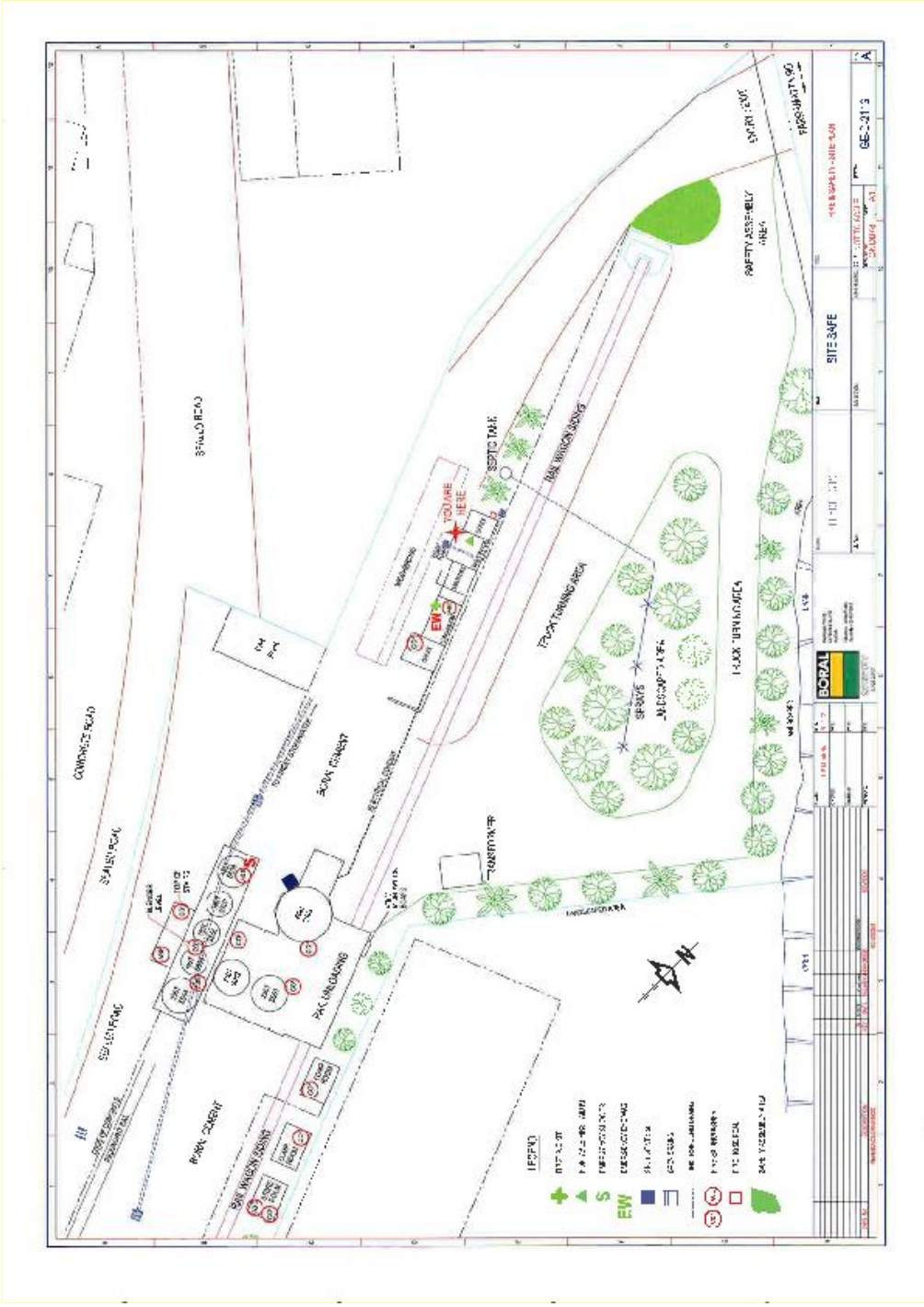


Figure 1 Boral Cement Clyde Site Layout

Figure 3 Spill Kit and Fuel Depot Location

2.2.5. Safety Equipment

The site utilises 3M spill kits purchased from Blackwoods. The site HSE staff replenish the kits as required but personnel are encouraged to do so themselves post-incident. These kits are capable of containing large spills of hydrocarbon liquids.

A spill kit is a 240L wheelie bin that contains the following:

- 25 x 3M™ HP156 Oil & Petroleum Sorbent Pads (0008 7006)
- 2 x 3M™ P-FL550DD Oil & Petroleum Folded Sorbent Rolls (0082 7747)
- 2 x 3M™ T280 Oil & Petroleum Double Booms (0116 1379)
- 5 x Contaminated Waste Bag (0120 6293)
- 2 x 3M™ 4251 Disposable Half Face Respirator (0034 1020)
- 2 x pair Solvent & Oil Resistant gloves (0403 8056)
- 2 x 3M™ Fahrenheit Goggles (0105 5946)
- 2 x 3M™ 4530+ Protective Coveralls
- 1 x Spill Response Procedure

Spill kit training has been provided through Absorb. One-point lessons on utilising spill kits have been circulated to the spill kit station

Fire response on site is addressed in the Site Emergency Response Plan. The type of fire extinguishers used on site are appropriate for their application. Fire extinguishers are fitted to all buildings, mobile plant and light vehicles.

3. Immediate Notifications

3.1. Internal Notification

Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the HSE Regional Manager, or Regional Environment Manager.

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 BCM personnel must be contacted immediately:

Table 4 Internal Reporting List

Staff	Position	Office Number	Mobile Number
	Head of Logistics and Mobile assets - Cement		
	Depot Manager Cement		
	Environmental Sustainability Manager - Cement		
	Environmental Business Partner		

Whilst personal contact details for the following are available in the Controlled on site Pollution Incident Response Management Plan they do not appear in this public document

4. The Boral Cement Depot Manager (Kyle Walker), or in case of his unavailability one of the Senior Management personnel listed above, is to immediately notify the Environment and Sustainability Manager.
5. Environmental and Sustainability Manager is to immediately notify all Appropriate Regulatory Authorities specified in Appendix A.

3.2. Notification of Government Authorities

Any pollution incident that causes or threatens “**material harm**” to the environment or people **must be notified to government authorities immediately** upon becoming aware of the incident by the Environmental and Sustainability Manager. The **notification should be restricted to facts only**.

When **new information comes to hand following the initial notification, this information must also be communicated immediately**. For the definition of “material harm” caused by a pollution incident refer to Section 1.3.

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. 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.

The contact list of Compulsory Authorities is presented in Appendix A who must be notified in ALL cases requiring environmental notification. Other Authorities may need to be notified as appropriate. **All immediate notifications and updates are to be recorded** in the Pollution Incident Immediate Notification Log (In Appendix A).

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 (Appendix A).

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, is seems that some of the Government Authorities prepared a detailed questionnaire which is being filled 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:

- *location, time and duration of the pollution incident;*
- *nature of the incident (spill, fire, unlicensed harmful discharge, etc);*
- *estimated quantity or volume and concentration of any pollutants involved, if known;*
- *assessed level of incident gravity: "it seems to be…" (e.g. "a relatively minor spill", "major fire", "explosion limited to one building", etc.);*
- *action taken and 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.

Boral's Senior Corporate Management must be informed promptly of the fact of immediate notification to the Authorities.

3.3. Notification of Neighbours

In case of pollution incidents that may **potentially pose threat to the health and safety of the neighbours** (e.g. toxic fumes, fire, fuel spill into the street or to coastal verge, release of a thick dust cloud, etc.), **the neighbours must also be urgently notified**.

The early warning of the neighbourhood notification will be undertaken by phone or door knock. The current contact list for neighbours is attached in Appendix B. The initial notification should be brief and contain only a description of the environmental threat together with instructions what to do. For example:

- *Due to a dust collector's failure, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.*
- *An accidental trade effluent discharge occurred from the site to a local creek. Please refrain from recreational use of the area until testing confirms that the water is safe.*

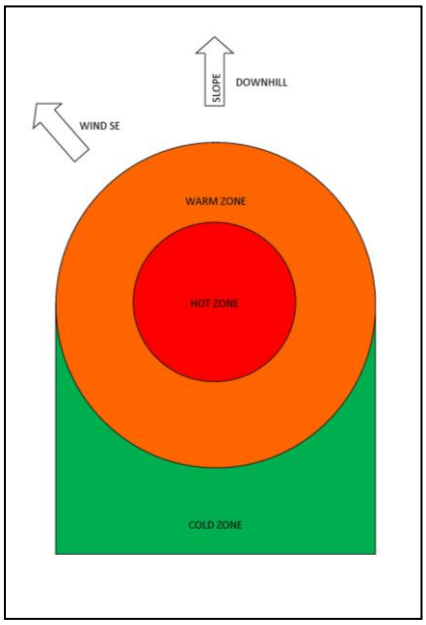
- *Due to a diesel spillage on the site, a cleanup operation is being organised. Please be watchful for road traffic in relation to this operation.*
- *Potentially hazardous blast fumes have been released, please keep your doors and windows closed until further notice*

A follow up information on the resolution of emergency situation would be timely conducted on the phone or by means of a letterbox drop.

4. Pollution Incident Emergency Response

In the event of a pollution incident the risk of harm to human health and the environment will be minimised by engaging an appropriate pollution response as outlined below:

1) **Safety First**; Ensure emergency services are contacted immediately in the event to harm of any personnel.
2) **Stop the source**: If it's safe to do so, stop the process causing the spill/leak or other environmental incident.
3) **Isolate the area**: The first person to notice the spill or leak should remove themselves from the immediate area and take measures such as barricading the area to reduce the risk of exposure to others. This must occur without exposure to danger.
4) **Commence early notification**: The Manager or Supervisor must be notified immediately of the environmental incident. They in turn must immediately inform one of the persons nominated for notification of Authorities (see Appendix A). If the environmental incident is significant, the nominated person implements early notification procedures to the relevant Authorities including emergency services. Alerting the potentially affected neighbours may also be required (see Appendix B), with regular updates provided as needed.
5) **Provide a 1st aid response** (if required): First aid kits including instruction on use are available at the locations indicated in the Site Emergency Response Plan. Emergency shower and eye wash bays are suitably located, easily accessible and in good working order. Appropriate PPE is worn by all staff during periods of potential exposure as outlined in relevant SDS.
6) **Identify the release to the greatest extent possible**: Do so without being at risk. This includes identifying:
    i) the type of material released;
    ii) Class 1 Explosives;
    iii) Class 2 Gases - compressed, liquefied or dissolved under pressure;
    iv) Class 3 Flammable Liquids;
    v) Class 4 Flammable Solids, Substances liable to spontaneous combustion and Substances which in contact with water emit flammable gases;
    vi) Class 5 Oxidizing Agents and Organic Peroxides;
    vii) Class 6 Toxic and Infectious Substances;
    viii) Class 7 Radioactive Substances;
    ix) Class 8 Corrosive Substances;
    x) Class 9 Miscellaneous Dangerous Goods;
    xi) The label and Safety Data Sheet for the product should give information on safe cleanup (available in the ChemAlert application on the Boral Intranet);
    xii) The size of the release and whether the release has stopped;
    xiii) Whether chemicals involved may be potentially incompatible; and
    xiv) Any unusual features such as foaming, odour, smoke, etc.
7) **Determine the level of emergency**: review chemical risk assessments, seek internal advice from area specialists, review SDS's and seek professional advice from the fire brigade and/or hazardous material specialists.
8) **Determine if evacuation is required** and assess whether the impact of wind, rain, local geographical features such as hills and stormwater drainage systems may increase the risk of pollutants spread. Adapt zones accordingly. If in doubt commence evacuation to "cold zones" **Following a Pollution / Hazardous Material Incident the Emergency Site is to be divided into Hot, Warm and Cold Zones - for management purposes**. The Chief Warden is responsible for the management of the COLD ZONE, all personnel are to be evacuated from the hot/warm zone.
    a) **Hot Zone**: This is the area of likely contamination. Only personnel wearing the appropriate level of protective clothing and equipment are to enter this zone. The area of the Hot Zone is defined, controlled and co-ordinated by the Hazmat Controller (FIRE BRIGADE).
    b) **Warm Zone**: This is the area immediately surrounding the Hot Zone where decontamination takes place and personnel and equipment are prepared for deployment. Only personnel wearing the appropriate level of protective clothing and equipment are to enter this zone. The area of the Warm Zone is defined, controlled and co-ordinated by the Hazmat Controller (FIRE BRIGADE).
    c) **Cold Zone**: This is the area immediately surrounding the warm zone. It is the support area where access is limited to support agencies personnel and equipment. This zone contains the Site Control, triage and treatment facilities and other marshalling and assembly areas. The Cold Zone is free of contamination and personnel protective clothing is not required. The area of the cold zone is defined by the site controller in consultation with the Hazmat Controller and managed by the CHIEF WARDEN.



9) **Stop further release** (if not done prior): prevent further release by isolating the source of the release. (Trained personnel only with suitable PPE)
10) **Stop the release from spreading** (if safe to do so):
11) **Prevent off-site release of contaminated stormwater**: Protect stormwater grates with booms, covers or drain socks.
    a) Liquid spills: Deploy spill kits to prevent further contamination dispersal, using appropriate absorbent/containment materials such as loose absorbent, socks or pads (land) and booms (water). See also "GRP-HSEQ-8-07 Spill Management".
    b) Powdered solid spills: Lower down the silo rolling doors to minimise dust, cover stormwater grates to prevent ingress of solids.
    c) Releases of pollutants into the air: Shut down ventilation systems to keep gases, vapours and dust from spreading.
    d) Large spills: Summon specialist spill emergency response contractors (e.g. Cleanaway Solutions (1800 774 557, 1800 SPILLS).
    e) Fire: If possible, endeavour to prevent fire-fighting water from entering the stormwater drains as it typically carries contamination. If possible, divert fire from areas containing materials that may generate toxic fumes when burned (e.g. stores of chemicals, cleaning aids, motor oil, etc.).
12) **Dispose of contaminated spill response materials and wastes** using a licensed contractor.
13) If required**, remediate** the site.

ALERT Site Manager – UHF XXX

CHIEF WARDEN

EARLY NOTIFICATION

IMMEDIATELY CONTACT BORAL CEMENT MANAGEMENT

IMMEDIATE NOTIFICATION OF AUTHORITIES

- EPA – ENVIRONMENT LINE
- PUBLIC HEALTH UNIT
- SAFE WORK NSW
- LIVERPOOL COUNCIL
- FIRE & RESCUE NSW
- RESOURCES REGULATOR
- OTHER AS APPROPRIATE

COMPLETE NOTIFICATION LOG

APPENDIX A PIRMP

INFORM SENIOR BORAL MANAGEMENT

Chief Warden to determine

EMERGENCY RESPONSE

REMOVE ALL PERSONS FROM HARM

ISOLATE THE AREA

PROVIDE 1ST AID

ENSURE SAFETY OF OTHERS

IDENTIFY THE SPILL

- The type of material released;
- The size of the release and whether it has stopped;
- Whether potentially incompatible chemicals are involved
- Any unusual features such as foaming, odour, smoke, etc.
- Discuss with hazardous material specialist / Fire Brigade
- Review SDS

CONTAIN THE SPILL, PREVENT FURTHER RELEASE

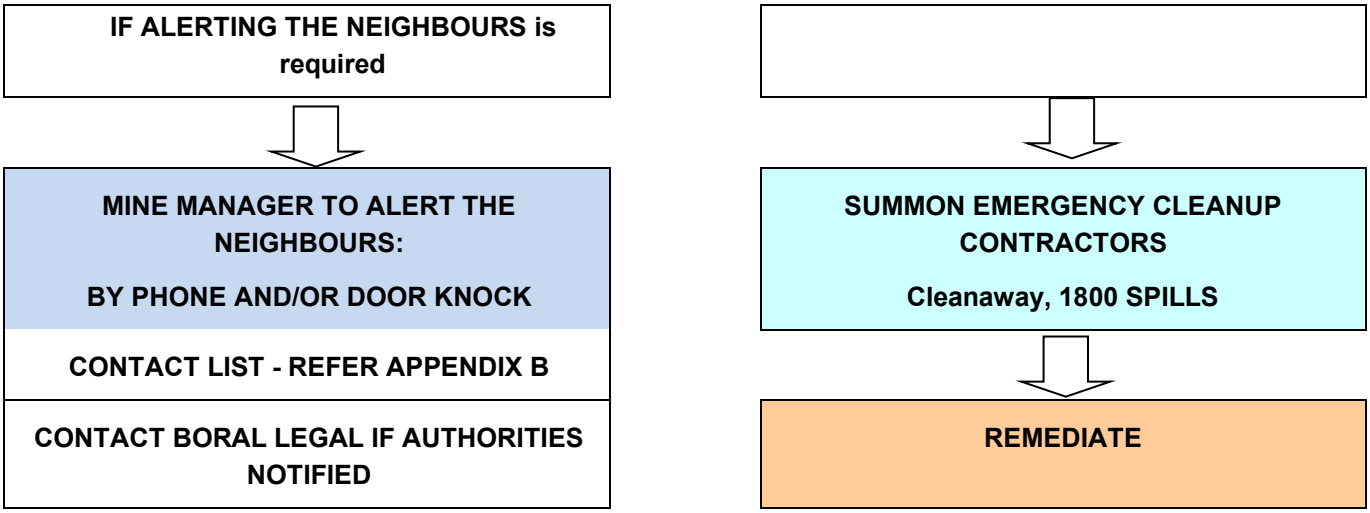
(If safe and if trained to do so)

DETERMINE "COLD ZONE"

RESTRICT ENTRY TO WARM & HOT ZONES

Chief Warden to determine

IF EVACUATION is required



5. PIRMP Training Testing and Review

The Emergency Planning Committee (EPC) and Environmental Coordinator will be responsible for testing the contents of the Pollution Incident Management Plan annually. Pollution incident testing will also be undertaken within 1 month of any pollution incident occurring to ensure the plan is capable of being implemented in a workable and effective manner.

Testing can be completed through the following methods:

- Simulated environmental emergency drills/exercises, or
- Desktop simulations.

Training or information will be provided on an annual basis 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.

Staff training is recorded in the site Training Matrix. Site inductions for visitors and sub-contractors also advise individuals to report any environmental incidents or spills to site supervisors and key personnel immediately. A summary of the PIRMP Drills undertaken at Boral Cement Clyde is shown below in Table 5. Please note that V4 of the PIRMP consolidated the incident list. Incident numbers may be reflective of old versions of the PIRMP

Responsibilities of the EPC are outlined under: *Organisational Arrangements and Contacts - 2.1 Emergency Planning Committee.*

Table 5 PIRMP Drill Dates

Test Date	Version tested	Incident Drilled	Drill Team Lead
09/03/2018	8	Flyash spill during loading	Brian Soper, Jason Bowering Ed Richardson
14/05/2019	9	Cement spill from silo loading	Brian Soper, Jason Bowering Ed Richardson
04/12/2020	10	Cement Spill during truck loading	Matt Paulic, Brian Soper, Jason Bowering
08/12/2021	11	Cement Spill during truck loading	Kyle Walker, Jason Fuller, Leigh Polock
27/10/2022	12 (draft)	Hydrocarbon Spill from truck	Ben Williams, Kyle Walker
10/10/2023	13	Cement Spill from Silo Loading	Kyle Walker, Lauren Sibigtroth
11/11/2024	13	Cement Spill from Silo Loading	Kyle Walker, Lauren Sibigtroth
31/11/25	14	Cement Spill from Silo	Kyle Walker, Jason Fuller, Lauren Sibigtroth

Revisions are to be coordinated by the Site Manager and Environmental Representative on an annual basis and within 1 month of material harm incident. The review will include a review of legislation, approval and licence changes. 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.

6. Appendix A Pollution Incident Notification Form

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				
Safework NSW				
Other: (including neighbours)				
Other: (including neighbours)				
Other: (including neighbours)				
Other: (including neighbours)				
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				
Safework				
Other:				
Other:				
Summary of additional communication				

7. Appendix B Immediate Notification Contact Numbers

Boral Staff	Position	Office Number	Mobile Number
	Head of Logistics and Mobile assets - Cement		
	Depot Manager Cement		
	Environmental Sustainability Manager - Cement		
	Environmental Business Partner		

Whilst personal contact details for the following are available in the controlled version of the Pollution Incident Response Management Plan they do not appear in this public document

Government Authority - Compulsory Notifications	Emergency notification phone number
EPA – Environment Line	131 555

Fire & Rescue NSW	1300 729 579
Parramatta Council	1300 617 058
Public Health Office - Western Sydney	BH: 02 9840 3603 AH: 02 9845 5555 (Westmead Hospital) Ask for Public Health Officer on call
Safework NSW	13 10 50 Company ABN asked: 62 008 528 523
Government Authority - ring if relevant	**Emergency notification phone number**
Roads and Maritime Services	132 701
NSW Office of Water	8838 7885
Bush Fire Control Officer	1800 049 933
Poisons Information Centre	131 126
Endeavour Energy (power emergencies)	131 003

Direction	Neighbours	Address	Emergency Notification	Method
	Amart Furniture	28 Short St Auburn	02 8748 9700	Phone
	Sydney Trains	Clyde Maintenance Depots	Incident Hotline: 1800 148 738 Clyde Office: Bob Francis 02 9848 9017, 0401148738	Phone
	Cement Australia	Highgate Street	1300 236 368	Phone
	Manildra Harwood Sugars	Parramatta Rd, Clyde	02 9682 5522	Phone

Whilst personal contact details for the following are available in the controlled version of the Pollution Incident Response Management Plan they do not appear in this public document