SOILCO Pty Ltd
ABN 85 055 303 243
PO Box 199
Unanderra NSW 2526
Telephone: 02 4252 9100
www.soilco.com.au

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

KEMBLA GRANGE COMPOSTING & MANUFACTURING FACILITY

2/132 West Dapto Rd, Kembla Grange (EPL 21174)

Version 4, June 2023

Table of Contents

1. Pollution Incident Response Management Plan 2
1.1 Pollution Incident Procedure 2
1.2 Description of Hazards 5
1.3 Notification of Internal Parties 5
1.4 Notification of External Parties 6
1.5 Communicating with neighbours and local community 6
1.6 Pre-emptive actions 6
1.7 Potential pollutants and their location on site 6
1.8 Site Layout 7
1.9 Training, Testing and Review. 7

List of Figures

Figure 1: Pollution Incident Reporting Flow Chart 4
Figure 2: Surrounding Areas Potentially Impacted by a Pollution Incident 9
Figure 3: Composting & Manufacturing Facility Site Layout (*Soilco 216*) 10

1. Pollution Incident Response Management Plan

A Pollution Incident Response Management Plan (PIRMP) has been developed to describe SOILCO's response to a potential pollution incident and to meet the requirements of the Protection of the Environment Operations Act (POEO Act 1997) at the Kembla Grange Composting & Manufacturing Facility (CMF), 2/132 West Dapto Rd, Kembla Grange. This plan identifies the potential hazards and actions to be taken to prevent environmental harm, detailing any communication required in the event of an incident.

1.1 Pollution Incident Procedure

A pollution incident is required to be notified if there is a risk of **'material harm to the environment'**.

Material harm is defined in s.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.

It is necessary to follow the procedures in notifying a pollution incident to premises in the vicinity and to relevant authorities so that communication with all necessary parties occurs in a timely manner to minimise the impact of the pollution incident on the environment and human health. Actions to manage, control and clean should be implemented where practicable as soon as possible to minimise potential impacts.

- Step 1: Emergency Response: Ensure personnel are safe (refer to the Emergency Response Plan in the Site Specific Management Plan (SSMP) (*Soilco152*)).
- Step 2: Emergency Response: Is evacuation required?
- Step 3: Notify Management
- Step 4: Management to assess pollution incident and notify external parties without delay where there is a risk of 'material harm to the environment'.
- Step 5: Take action to manage, control and clean as appropriate to the pollution incident to prevent and minimise harm to persons and the natural environment. Measures taken will be dependent on the type of incident, e.g.:
  - Water Pollution: pumps and tankers to remove spills, barriers/booms to contain spills. Containment and clean-up measures to prevent further pollution is described in Soilco's Spill Management Plan (CA-05) (*Soilco235*).
  - Air Pollution: covering wastes to prevent pollutants becoming airborne and odours being emitted, use of dust suppression systems e.g., water cart.
  - Land Pollution: barriers e.g., bunding, physical removal.

The attached flow chart (Figure 1) details the steps above, ensuring in the event of a pollution incident the following stakeholders are notified:

- Owners and Occupiers of Premise
- Local Authority
- Any area affected or potentially affected by the pollution; and
- Any other persons or authorities to be notified.

The flow chart also provides the details of key individuals who are responsible for managing pollution incidents. This includes key individuals responsible for activating the plans, notifying the relevant authorities and individuals who have responsibilities for managing the response to a pollution incident. Also included are the contact details for the appropriate regulatory authorities.

The procedures to be followed to coordinate, along with authorities and other notified persons, the actions to be taken to address the pollution caused by the incident are outlined in Emergency Response Plan of the SSMP (*Soilco152)*.

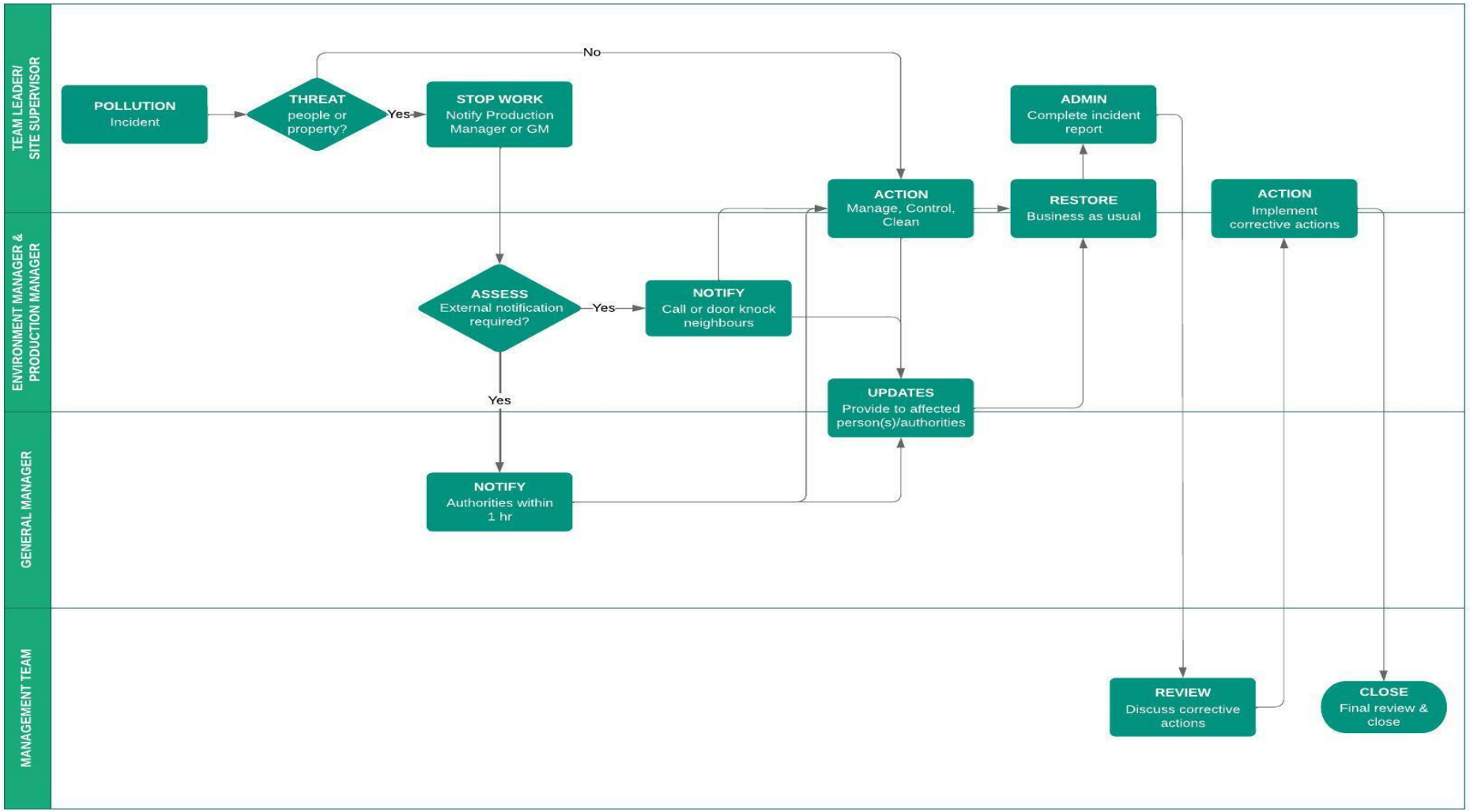

Figure 1: Pollution Incident Reporting Flow Chart

1.2 Description of Hazards

Potential pollution incidents identified for the CMF include:

- Air Pollution (Odour) Incident: Escape of significant dust or smoke to atmosphere.
- Water Pollution Incident: Escape of significant sediment, leachate or fuel off site to water.
- Noise Pollution: Noise only pollution is not included as a notifiable incident.
- Land Pollution Incident: Escape of significant sediment, leachate or fuel off site to land.

Risk assessments for the types of hazards described above can be viewed in in the Risk Register (*REG038*) under the environment and WHS categories.

1.3 Notification of Internal Parties

Team Leader/Site Supervisor

- First point of call if a pollution incident occurs
- Responsible for determining the level of action required (stop work/using appropriate measures to manage the incident).
- To follow Emergency Response Plan (*Soilco152*) with site personnel to ensure their safety
- Notification of incident to Production Manager
- Manages, cleans and controls incident and returns business to normal
- Notify administration to complete an incident report
- Ensure corrective actions decided upon by the management team are being implemented.

Production Manager – **Jamie Fletcher 0428 062 881 or Environment Manager – Dominic Flanagan 0447 774 661**

- Determines if incident requires authorities to be notified
- Informs neighbours of incident and provides updates to affected persons
- Assists in the clean-up of the incident and help return business to normal
- Ensure corrective actions decided upon by the management team are being implemented.

Executive General Manager – **Heath Barnes 0417 704 375**

- Alerts relevant authorities within 1 hour of incident occurring
- Provides updates to persons affected and authorities as needed.

Management Team

- Reviews incident reports and discusses the corrective and preventive actions that could be implemented
- Ensures that corrective/preventative actions have been put in place by final review of incident
- Closes incident report.

1.4 Notification of External Parties

The following outlines the contact details and correct sequence for notification in the event of a notifiable pollution incident. The Executive General Manager (EGM) will carry out the notifications required below (where applicable):

External Party	Contact Details
Emergency Services (if dealing with an emergency)	000
Affected Persons	See 1.5 below
EPA Environment Line	131 555 (Option 1)
Public Health Unit (Wollongong Hospital)	4221 6700 (Public Health Officer)
SafeWork NSW	13 10 50 (Option 2; Option 2)
Wollongong City Council	4227 7111
Other emergency contacts include:	
Rural Fire Service (bushfire information 9am to 5pm)	1800 679 737
State Emergency Service (floods & storms)	132 500
Roads & Maritime Services (road closures)	132 701
Police Assistance Line	131 444

1.5 Communicating with neighbours and local community

Communicating with neighbours and the local community is essential when managing the response to a pollution incident. Providing early warning and regular updates to the owners and occupiers of premises who may be affected by a pollution incident is required. If deemed necessary, neighbouring properties (stakeholders) will be door knocked to ensure they are informed of an emergency.

Stakeholder liaison will then be coordinated from Head Office by the EGM Finance & Operations. Regular updates will continue by phone and email while the incident is managed back to normal operations.

Stakeholders will be advised by door knocking when the incident is controlled, and normal operations have recommenced.

Neighbours and local community directly adjacent to site who may be included in this process are included in Appendix 1.

1.6 Pre-emptive actions

Pre-emptive actions to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises are detailed in the SSMP (*Soilco152*).

1.7 Potential pollutants and their location on site

At all times minimising harm to persons will be a priority. The following inventory of potential pollutants is therefore provided to ensure site staff and emergency service personnel understand the potential scale and likely impact of a pollution incident.

- Deodour Air Alpine 1000 – Deodoriser
- BL 10-B Truck Wash – Cleaning Agent
- Diesel Fuel Trailer – Approx. 600L
- Colouring – Mulch Colorant – Approx 1000 L
- Diesel – 33,000 L
- First Flush daily storage – 105kLBiofilter initial storage - 10kL
- Leachate "pre pit" tank - 100kL

- Main leachate storage tank - 157kL
- Drilling mud receival pit – 100kL
- Drilling mud equalising tank – 157kL
- Drilling mud testing tank – 100kL

1.8 Site Layout

A site layout is provided on the noticeboard located in the Administration office and includes the following information:

- Location of the premises (Figure 2);
- The surrounding areas likely to be affected by a pollution incident (Figure 2);
- The location of potential pollutants on the premises (Figure 3);
- The locations of stormwater drains and on site detention tanks (Figure 3); and
- Emergency services information such as fire hydrants, fire hose reels, spill kits, first aid kits and emergency assembly point (Figure 3).

The site layout is important as an operational and emergency management tool and is essential to helping to ensure proper emergency planning and response. The site layout is included as part of the SOILCO site induction procedure so that all visitors and contractors are familiar with this information.

1.9 Training, Testing and Review.

There is a very low risk of a pollution incident occurring. Soilco will review the PIRMP every 12 months (refer to PIRMP register tab in the QSE register (*Reg015*)) and amend as required. Testing and review will be carried out by the management team (refer to Figure 1). Testing will include a scenario and confirmation that all contact details are current. All staff will be trained in the PIRMP and emergency response procedures at the time of review and testing. The PIRMP will also be tested within one month of any pollution incident occurring which caused or threatened material harm to the environment.

Administration and management staff are currently located at the Kembla Grange CMF with operations and workshop staff floating on/off site.

The premises are secure and alarmed with back to base monitoring. Unauthorised access to the site is difficult given the security fencing around the entire perimeter. Visitors must attend the administration office prior to entry to the site and all public areas are outside the building.

Staff training includes the environmental guidelines discussed throughout this document. Emergency planning and procedures are also part of the Company's SMS i.e. an evacuation plan. SOILCO recognises and acknowledges its obligations to take all practicable action to protect the health and safety of its employees, customers and visitors.