



Pollution Incident Response Management Plan

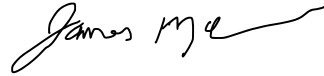
Wakefield Ashurst Developments Pty Ltd Recovery Facility
Lot 102 DP 1269752 The Southern Parkway
Forster NSW 2428

Pollution incident response management plan

Licence number: 21572

Approved by: James McMahon

Signature:



Position/Title: Delegated Authority

Date: 30/6/2025

Purpose:

WAKEFIELD ASHURST DEVELOPMENTS PTY LTD Trading as SEASCAPE DIAMOND BEACH holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for KENTIA DRIVE FORSTER, The Southern Parkway, Forster NSW 2428. 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 will be kept at the licensed premises 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 will also be available by providing a copy of the plan to any person who makes a written request as set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

This plan is developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2022 and with reference to the EPA's Guideline: Pollution incident response management plans.

Environment Protection Licence (EPL) details

Name of licensee: WAKEFIELD ASHURST DEVELOPMENTS Pty Ltd trading as
SEASCAPE DIAMOND BEACH
ABN 30 131 134 391

EPL number: 21752

Premises name and address: KENTIA DRIVE FORSTER 2428
Lot 102 DP 1269752 The Southern Parkway, Forster NSW 2428

Company or business contact details
Name: James McMahon
Position or title: delegated authority
Business hours contact number/s: 0427 893 668
After hours contact number/s: 0427 893 668
Email: james@jmenvironments.com

Website address: www.jmenvironments.com

Scheduled activity/activities on EPL: Resource Recovery

Fee-based activity/activities on EPL: Recovery of hazardous and other waste

Pollution incident – person/s responsible

PIRMP activation
Name of person responsible: Phil Lidbury
Position or title: Project Manager
Business hours contact number/s: 0409 433 661
After hours contact number/s: 0409 433 661
Email: consult@lswsurveyors.com.au

Pollution incident – person/s responsible, continued

Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

Name of person responsible: James McMahon

Position or title: delegated authority

Business hours contact number/s: 0427 893 668

After hours contact number/s: 0427 893 668

Email: james@jmenvironments.com

Managing response to pollution incident

Name of person responsible: James McMahon

Position or title: delegated authority

Business hours contact number/s: 027 893 668

After hours contact number/s: 0427 893 668

Email: james@jmenvironments.com

Notification of relevant authorities

Fire and Rescue NSW / Rural Fire Service

Contact number/s:

000 emergency
0292652999 M-F 8.30-5pm

EPA

Contact number/s:

131555

NSW Health

Relevant Area Health Service:

Contact number/s:

000 emergency
1300 066 055 local
Public Health Unit
1800 022 222 24hr
health advice

SafeWork NSW

Contact number/s:

13 10 50

Notification of relevant authorities, continued

Local authority/s *MidCoast Council*

Contact number/s:

02 79 55 7777
AH emergency 0419
165 048

Notification of neighbours and the local community

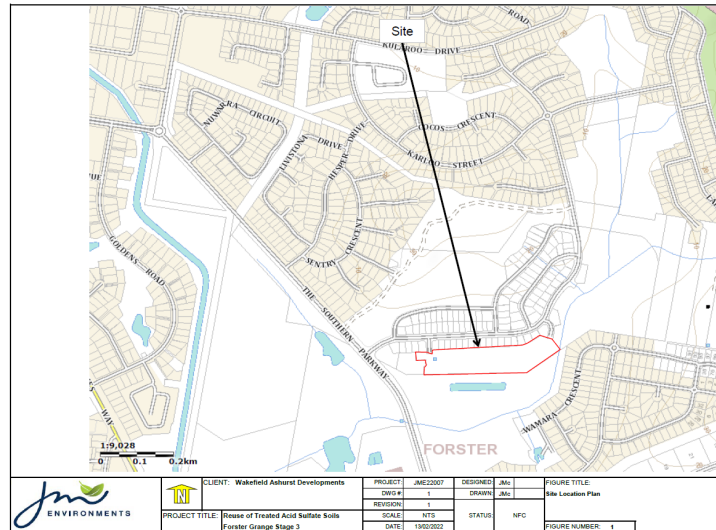


Figure 1: Site Location

KENTIA DRIVE FORSTER is bordered to the north by residential housing, to the east and south there is residential housing but at a further distance.

1. In the event of a non-urgent incident the neighbours will be advise by a letter drop. A follow up letter drop will be enacted if the incident is not finalised at the time of the initial letter drop.
2. In the even of an urgent incident, the potentially impacted neighbours will be advised by door knock. This will be followed by a letter drop as per item 1.

Description and likelihood of hazards

Key Environmental Hazards		Risk			Mitigation Measures	Revised Risk		
Air Quality								
1	Excessive dust emissions	Unlikely	Minor	Low	Water carts/spraying Stop dust generating activities as necessary Cover stockpiles.	Unlikely	Minor	Low
2	Equipment exhaust emissions exceed limits	Rare	Minor	Low	All equipment is serviced and maintained. Excessive equipment emissions to trigger out of service procedures.	Rare	Minor	Low
3	Discharge of hazardous materials (untreated ASS)	Rare	Minor	Low	Neutralise ASS as soon as practicable. No untreated ASS to be left on site overnight.	Rare	Minor	Low
4	Spill during delivery of fuel to mobile equipment	Possible	Minor	Low	Breakaway couplings installed on mobile fuel delivery vehicles. Drivers stay with vehicle during refuelling. Emergency spill kits located on fuel delivery vehicles. Spill response equipment is regularly inspected and maintained. Mobile refuelling takes place in the pit. Drivers trained in spill response procedures. Refuelling takes place in designated refuelling areas.	Rare	Minor	Low
5	Spillage of Lime	Possible	Minor	Low	Lime stored in seal silo	Rare	Minor	Low
6	Noise	Unlikely	Minor	Low	The following equipment will be used: •Excavator	Unlikely	Minor	Low

					<ul style="list-style-type: none"> •Dump Truck •Dozer <p>The equipment will be well maintained to minimise noise</p> <p>2.The ASS treatment will operate 7am-5pmMonday-Friday</p>			
7	Odour	Unlikely	Minor	Low	Odours are unlikely to be generated but if required water cart/spraying to minimise	Unlikely	Minor	Low
8	Trafficking of Soil	Possible	Minor	Low	<p>Access roads will be upgraded and maintained with road base</p> <ul style="list-style-type: none"> •Vehicles will be parked on hard stand areas; •If necessary, vehicles should be cleaned to remove loose soil before leaving site •Grids will be placed at exit points to help remove soil from vehicles; and •Loads will be covered when transporting soil to site. 	Unlikely	Minor	Low
8	Stormwater/Leachate Management	Possible	Minor	low	<p>A clay lined sump was constructed adjacent to the ASSTP to collect storm water runoff and leachate. The leachate sump was constructed of clay with the following specifications:</p> <ul style="list-style-type: none"> •0.5m thick •Permeability $<1 \times 10^{-9}$ m/s •Leachate storage capacity is 1557m³. •Combined area of leachate sump/treatment pad 4,225m² •1 in 20 year 24 hour rainfall is 219mm. •Volume of collected by treatment pad/sump during 1 in 20 year 24 hour rainfall is 925m³. •Leachate storage has additional 40% capacity than required. 	Unlikely	Minor	Low

Pre-emptive actions to be taken

Pollutant and Safety Equipment Information

Legislative requirements under the Protection of the Environment Operations (POEO) Act dictate that the site is to provide information for all pollutants that are used and stored on the site.

Inventory of pollutants

Inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Lime	Max. quantity	Contents	Comments
Storage Area 1 (see Figure 3 for storage location)	2,000kg	Lime See Appendix D for MSDS	<p>Lime will be contained in a silo. Agricultural Lime does not pose a significant risk to the environment or human health.</p> <p>Assess Quickly assess the spill: Decide whether to handle the situation by yourself or if you require help. Advise your team of the spill</p> <p>Ensure Personal Safety First priority is to ensure safety of yourself and others in the area Consider evacuation and isolation. Do you or others require PPE Check Safety Data Sheet</p> <p>Contain Contain the spill quickly by surrounding with the booms which should be firmly secured in place. Find the source of the leak and stop it Emergency stop, cap, plug, move, adjust Recover lime from the surface</p>

			<p>Prevent Prevent spillage to stormwater drains or water courses</p> <p>Reporting Incident and Corrective and Preventative action should be captured on the safety system.</p>
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Minimising harm to persons on the premises

Site induction, positive communication between plant operators and delivery trucks (UHF radio)

Maps

Figure 1:

- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident

Figure 2 and Figure 3:

- location of potential pollutants on the premises
 - location of any stormwater drains on the premises.
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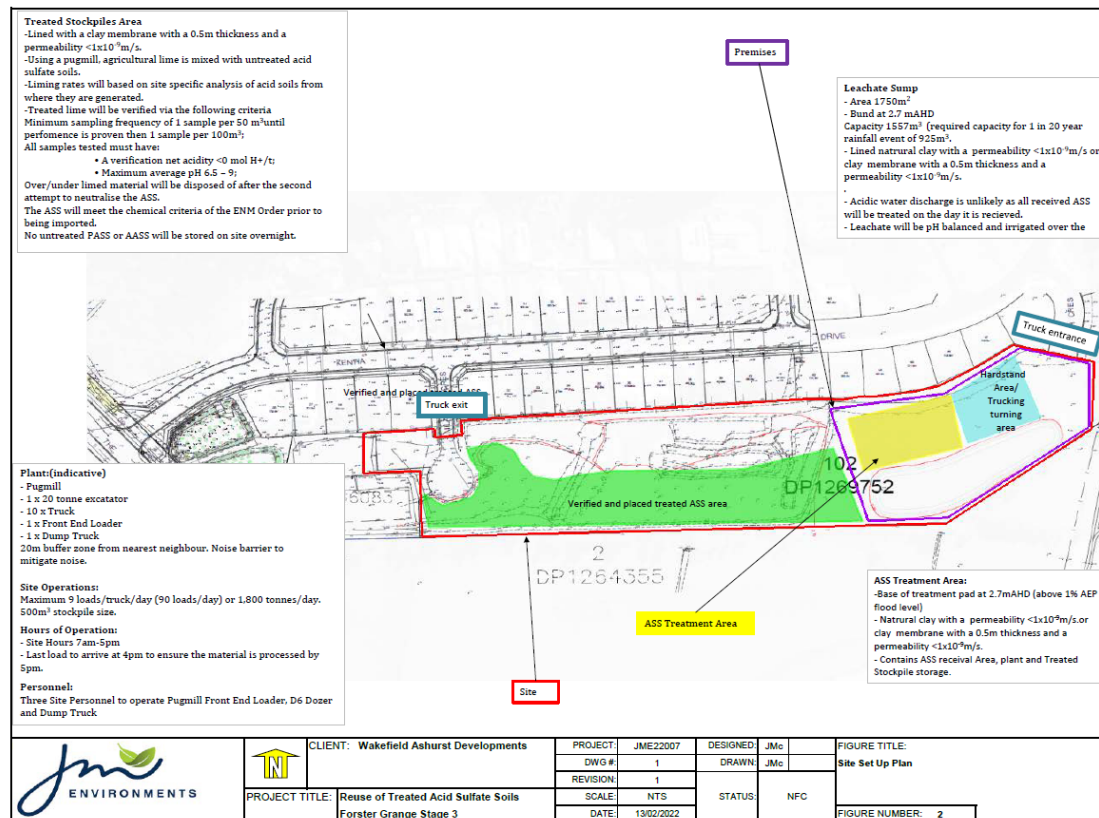


Figure 2: Site Set up Plan



Figure 3: ASS Treatment Pad set up Plan

Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

If it is suspected that an incident may cause material environmental harm the Pollution Incident Management Response Plan will be executed. This plan is based on seven phases:

1. Assess the severity, risks and extent of the incident:
 - What is the substance emitted?
 - What are its properties?
 - Is there a risk to health and safety?
 - Is there the necessary PPE to manage the emission?
 - What is the nature of the surrounding area?
 - What is the volume of the emission?
2. Stop the source of emission
 - Examples
 - Close valve causing the spill
 - Isolate feed line
 - Plug the leak
 - **If the emission has the potential to cause material harm, execute the next phase of the plan (Notify)**
3. Notify – Contact key individuals responsible for activating and managing plans and authorised to notify and coordinate relevant authorities
4. Contain – Utilise absorbent materials absorbent granules or sand to prevent the emission from spreading.
5. Mitigate – Implement environmental controls downstream of pollution to prevent/minimise further impact on the receiving environment.
6. Clean up – Remedial actions to restore the environment. Disposal of pollutants in accordance with regulations.
7. Review – Conduct an investigation into the event and assist the EPA with external enquiries. Test the effectiveness of this PIRMP annually and one month after the incident to ensure controls are replenished.

7.5 Communication Strategy

It is a legal requirement of the Protection of the Environment Operations (POEO) Act, to notify key stakeholders in neighbouring properties that may be affected by an incident.

Communicating with neighbours and the community in the event of an environmental incident is vital as they have a right to know about any spill that can potentially lead to material harm to their properties or themselves. The communication strategy in the PIRMP provides sites with a method of communicating with key stakeholders.

Key stakeholders include neighbouring residential and/or commercial properties, sensitive receivers ie farms, hospitals schools within the area of impact. Consideration must be given to sensitive receivers that may be affected if the emission reaches a water body. For example a farmer that is cultivating crops down river from your site will need to be informed of a spill to prevent him spraying his crops with polluted irrigation water.

The PIRMP must include details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by an incident occurring at the premises.

The communication strategy should also make reference to any actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises at the time of an incident. This is a legislative requirement that needs to be included in the PIRMP.

For a table detailing the communication strategy for this site:

Refer to Appendix C – Community Notification Strategy

7.6 Staff Training

Sites need to develop a toolbox talk based on the PIRMP. This training should be delivered to all appropriate personnel on site and be conducted to include potential scenarios that may require implementation of the plan.

Frequency of training

Training for site staff should be repeated annually, and after each update to the plan. In the event of an incident requiring the PIRMP to be activated a training drill should be carried within one month of the incident occurring.

7.7 Continual Improvement

It is a legislative requirement for this plan to be tested and updated on an annual basis and within one month of an incident.

To complete this requirement a Pollution Incident Response Test Checklist has been prepared and provided as Appendix B. The checklist includes the major elements of the plan that require testing:

- Contact numbers
- Evacuation drills
- Desktop assessment

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- Staff training and awareness
 - Environmental controls & PPE

Desktop assessments require site personnel, responsible for testing the plan, to select a scenario from the hazard and impact register (table 2) and ensure that all the required controls for the scenario are in place. During the desktop assessment environmental control and PPE equipment supplies should be inspected to ensure that they are functional and that there are enough materials to ensure that emissions relating to the scenario can be controlled effectively and safely.

Testing and updating of 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.

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Detail how the testing is documented and recorded (this must include the testing dates and names of all staff members who carried out the testing):

Detail the dates on which the plan was updated:

PIRMP testing details

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
12/03/2025	James McMahon	Desktop simulation – lime spill	Contact details, map and pollutant inventory out of date	12/03/2026

PIRMP update details

Date update occurred	Reason for update	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
30/6/2023	Original	PIRMP created		30/6/2023

18/3/2024	Review	PIRMP Testing details		18/3/2024
30/3/2025	Review	Desk top review		30/3/2025

NSW Environment Protection Authority

Email: info@epa.nsw.gov.au

Website: www.epa.nsw.gov.au

EPA 2022P3986

September 2022

The EPA [disclaimer](#) and [copyright](#) information is available on the EPA website.

Appendix A – Emergency Contact Details

Contacts

Individuals responsible for activating the plans and managing the response

Individuals Authorised to Notify and Coordinate Relevant Authorities

Emergency Services

EPA

The Ministry of Health via the local Public Health Unit

(List of NSW numbers

www.health.nsw.gov.au/publichealth/infectious/phus.asp)

SafeWork Authority

Local Council

Fire and Rescue NSW

Individuals responsible for activating the plans and managing the response

Phone Number

James McMahon Phil Lidbury

0427 893 668 0409 433 661

James McMahon Phil Lidbury

0427 893 668 0409 433 661

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131 555

Manning Base Hospital

(02) 6592 9111

(Ask for Public Health Officer on call)

13 10 50

Midcoast Council

02 7955 7777

000

James McMahon Phil Lidbury

0427 893 668 0409 433 661

Appendix B - Pollution Incident Response Test Checklist

Date:.....

Site:.....

Address:.....

Pollution Incident Scenario:.....

Instructions

1. Select an Environmental Incident applicable to the site to test in a Pollution Scenario (this may include a major spill, equipment failure or breaches of license consent that may cause impacts onsite and to the surrounding community);
2. Using the scenario conduct a desktop review using the Test Checklist as a prompt to ensure that each component of the PIRMP is up to date;
3. Sign off the checklist, scan and send to the NSW Planning & Environmental Coordinator;
4. Planning & Environmental Coordinator will make amendments to the plans and submit these to the site managers for review and approval;
5. Site Managers to hold a tool box talk with staff on the details of the PIRMP and keep a copy of the PIRMP onsite for future reference.

Are all contact details within the plan current and up to date?

Phone Numbers

Currency

Updated Number

Individuals responsible for activating the plans and managing the response

Individuals Authorised to Notify and Coordinate Relevant Authorities

Emergency Services

EPA

The Ministry of Health via the local Public Health

Unit

WorkCover Authority

Local Council

Fire and Rescue NSW

Additional Contacts relevant to the licensee's premises

Other Organisations or agencies that need to be advised of the incident

Environmental Hazards and Control Standards	Yes/ No	Actions
Are the descriptions of environmental hazards up to date?		
Are the potential and likelihood of incidents that could occur still correct and relevant to the site operations?		
Are the pre-emptive actions for risk management of the relevant activity correct and relevant to the site?		
Is there an inventory of pollutants (including		
quantities of pollutants onsite)?		
Is the listed safety equipment & PPE correct and up to date?		
Is there a map/s located onsite detailing the following; <ul style="list-style-type: none"> - The site and the surrounding area likely to be affected in the event of an incident - The Locations of storage/ holding points of pollutants - Stormwater drains and discharge points offsite 		
Are the nature and objectives of staff training set out in the plan?		
Are there details of mechanisms for providing early warnings and regular updates to the owners and occupiers?		
Is there a copy of the plan onsite and up to date?		

Has there been an evacuation drill in the last 12 months?

Date:.....

Notes:.....

Improvements to the Pollution Incident Response Management Plan:

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Comments / Recommendations / Review

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Pollution Incident Response Test Checklist Assessor:.....

Signed

Appendix C – Community Notification Strategy

If there is an Environmental Incident that has the potential to cause harm to the stakeholders on page 5 they will be contacted by door knock

Appendix D – MSDS Agricultural Lime