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AK Environmental PTY LTD

ENVIRONMENTAL ENGINEERING & CONSULTING

Pollution Incident Response Management Plan (PIRMP)

Riverbend Organics Composting Facility
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1. Context of the PIRMP

Ditton Properties Pty. Limited (Ditton Properties) owns the Riverbend Organics Composting Facility (ROCF), which is operated by Riverbend Organics Pty. Limited. Ditton Properties is the licensee of environment protection licence (EPL) 12510.

1.1 Pollution incident response management plan objectives

Pollution incident response management plans (PIRMPs) are plans all licensees of an EPL are required to prepare in accordance with section 153A of the Protection of the Environment Operations Act 1997 (POEO Act). By preparing and implementing a PIRMP that meets the requirements specified under the legislation, licensees will:

- minimise the risk of a pollution incident occurring as a result of their licensed activities, as they would have identified risks and the actions they propose to take to minimise and manage those risks
- have established clear and effective notification, action and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately, including:
    - people who may need to be involved in incident responses – including staff at the premises; the Environment Protection Authority (EPA); and other relevant authorities (such as Fire and Rescue NSW, NSW Health and local councils)
    - industrial, commercial and residential neighbours and other members of the community
- have properly trained staff and up-to-date incident management information available to ensure the potential impact of a pollution incident is minimised.

1.2 Legislative requirements

PIRMP requirements are set out in the POEO Act and Protection of the Environment Operations (General) Regulation 2022 (the General Regulation). Part 5.7A of the POEO Act requires all licensees to prepare, keep, test and implement a PIRMP. Chapter 4 of the General Regulation sets out the specific information a licensee must include in their PIRMP. In summary, the requirements are:

- all licensees must prepare a PIRMP (section 153A).
- a PIRMP must be in the form required by the regulations and must include the information detailed in the POEO Act (section 153C) and the General Regulation (sections 72 and 73).
- licensees must keep the PIRMP at the premises the environment protection licence relates to, or where the relevant activity takes place (in the case of trackable waste transporters and mobile plant) (section 153D of the POEO Act) and make certain parts of the PIRMP available on a publicly accessible website of the licensee, or alternatively provide a copy upon written request (section 74 of the General Regulation).
- licensees must test their PIRMP in accordance with the regulations (section 153E of the POEO Act and section 75 of the General Regulation).
- licensees must implement their PIRMP immediately if a pollution incident occurs that causes or threatens material harm to the environment (as defined in section 147 of the POEO Act) (section 153F of the POEO Act).

1.3 Definition of a Pollution Incident

NSW EPA defines a pollution incident as:

> *"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."*

1.4 Duty to Notify

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 $50,000 (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."*

The requirement to notify a pollution incident equally applies where the harm is caused only within the premises where the pollution incident occurs, and also where the harm is caused external to the premises.

It is also a requirement to report incidents immediately (ie. promptly and without delay) to EPA, Fire and Rescue NSW, SafeWork NSW and the relevant local council.

1.5 Scope of PIRMP

The scope of the ROCF PIRMP has been developed using *Guideline: Pollution Incident Response Management Plans* (NSW EPA 2022) and is as follows:

- description and likelihood of hazards;
- pre-emptive actions to be taken;
- inventory of pollutants;
- safety equipment;
- contact details;
- communicating with neighbours and the local community;
- minimising harm to persons on the premises;
- maps showing the location of scheme components;
- actions to be taken during or immediately after a pollution incident;
- requirements for testing and updating the PIRMP; and
- staff training.

In summary, the PIRMP is required to include the following:

- the procedures to be followed regarding notification in the event of a pollution incident;
- a detailed description of the action that will be taken immediately after a pollution incident to minimise and control any pollution;
- the procedures that will be followed regarding coordinating with any notified authorities or persons; and
- any other matter required by the regulations.

2. The Premises

2.1 Site Location

The ROCF is located at 442 Anambah Road, Anambah (Figure 1). The operations are undertaken at Lot 22 DP1069012. The Hunter River is approximately 1 km to the east of the site.

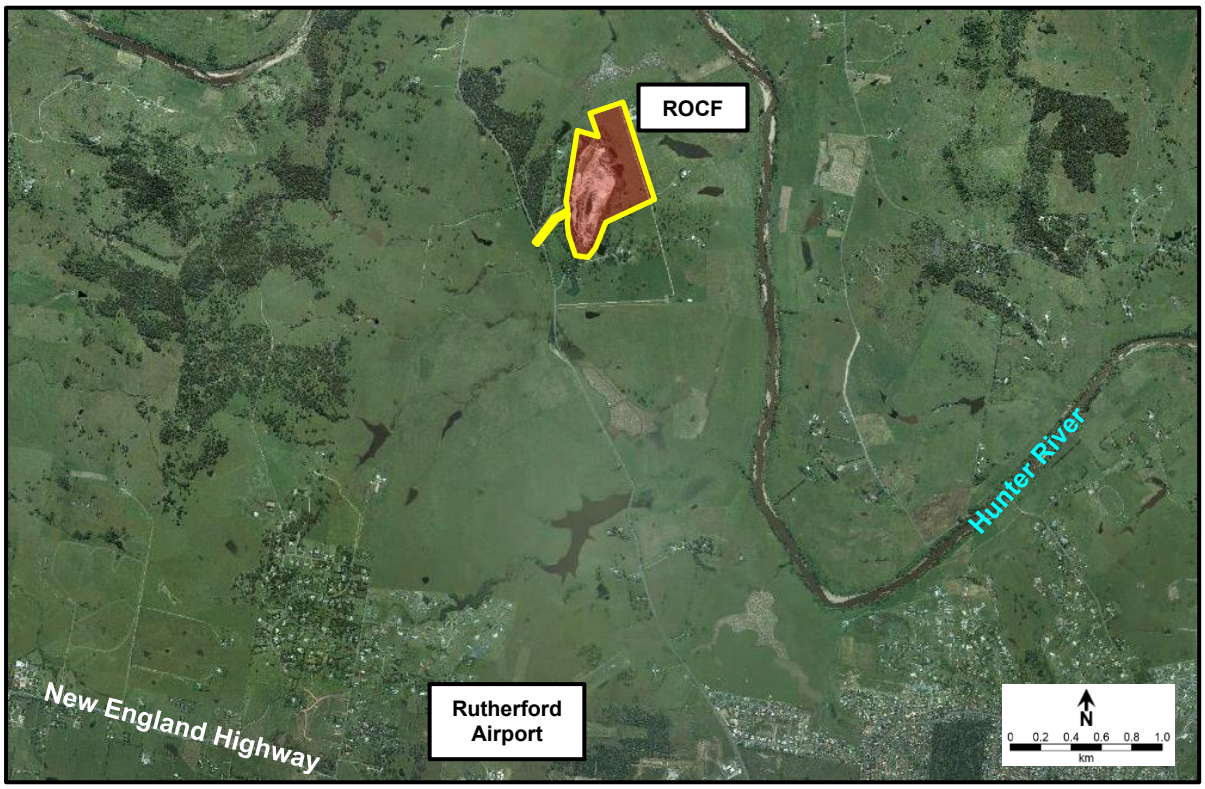

Figure 1 – Site lot boundary and general locality (image source: SixMaps)

2.2 Site Characteristics

The ROCF is sited near sensitive receptors (Figure 2) which require implementation of considered environmental management. The sensitive receptors are:

- adjacent neighbouring residences (note the residence located immediately west of the composting operations area is now within the consolidated site lot and is not considered to be sensitive); and
- the Hunter River.

The 32 ha site is accessed via Anambah Road to the west. The land surface slopes have been highly modified by previous quarrying operations. As shown in Figure 3 the northern portion of the site drains to Sediment Dams 1 and 2, the central portion drains to Central Dam, and the small southern portion drains to Sediment Dam 3.

The offsite surface water overflow locations are at the northern embankment of Sediment Dams 1 and 2, and the southern embankment of Sediment Dam 3 (see Figure 3). According to the *Greta 1:25,000 Topographic Map (9132-1S)* (Land and Property Information 2016), the waterway flow path to the Hunter River is approximately 2.5 km in length. Overflows to the north enter a very large farm dam approximately 300 m to the north. There is no defined

waterway connection between the dam and the Hunter River, however, anecdotal evidence indicates overtopping events to the Hunter River occur periodically.

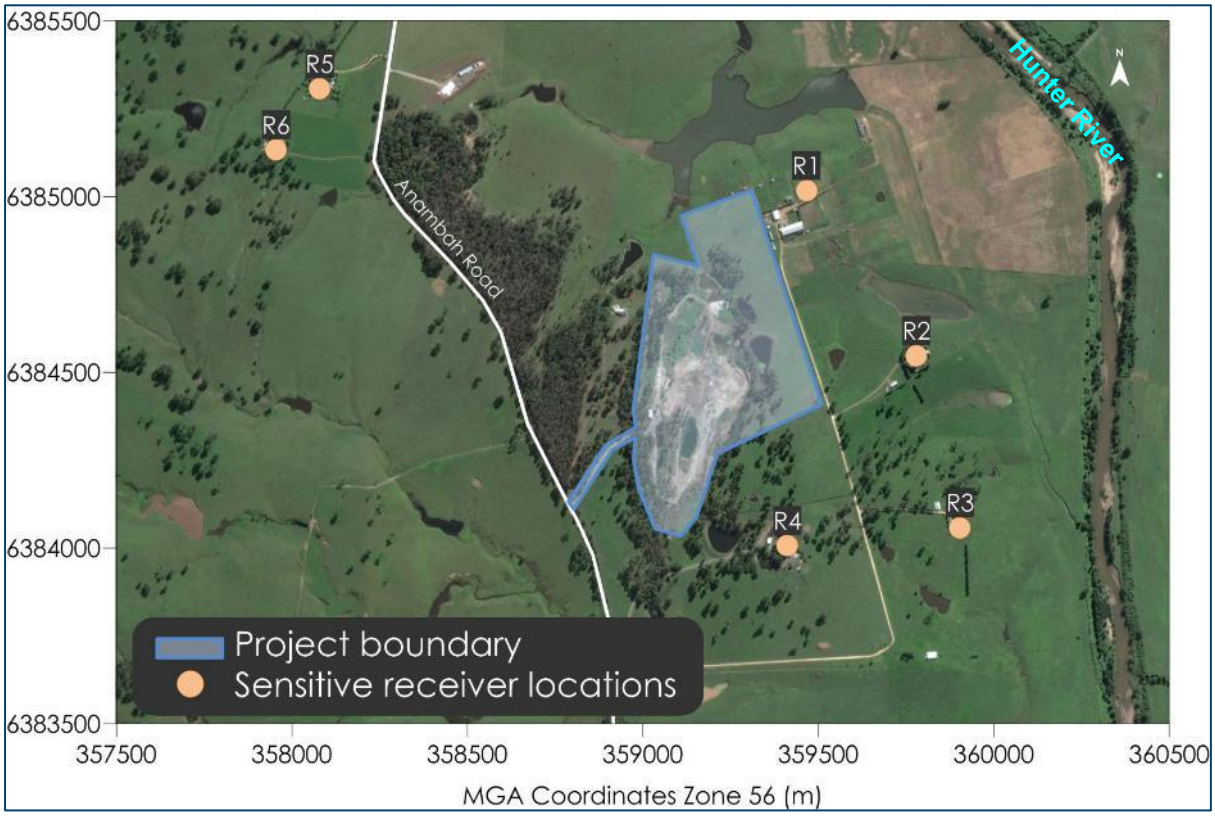

Figure 2 – Site lot boundary and sensitive neighbouring receptors (Todoroski 2018)

2.3 Site Supervision

The ROCF Onsite Manager performs the day to day management responsibilities at the facility. All delivery, dispatch, and operations are restricted to between 7:00am to 5:00pm Monday to Saturday. ROCF staff are present during these operating times. No operations of any kind are permitted on Sundays or Public Holidays. A lockable security gate at the entry road prevents the entry of traffic outside of operating times. Vehicles movements are controlled by signage.

2.4 Site Development

The most recent amended approval for DA/2015/433:4 was issued by Maitland City Council (Council) on 9 May 2023. A condition of consent is that:

> *"DA 95-163 for quarrying shall be surrendered to Council on …. 40,000 tonnes of waste being processed at the site or five (5) years from commencement of composting operations whichever occurs first."*

The approval for quarrying operations has since been surrendered and its associated PIRMP is no longer applicable to the site.

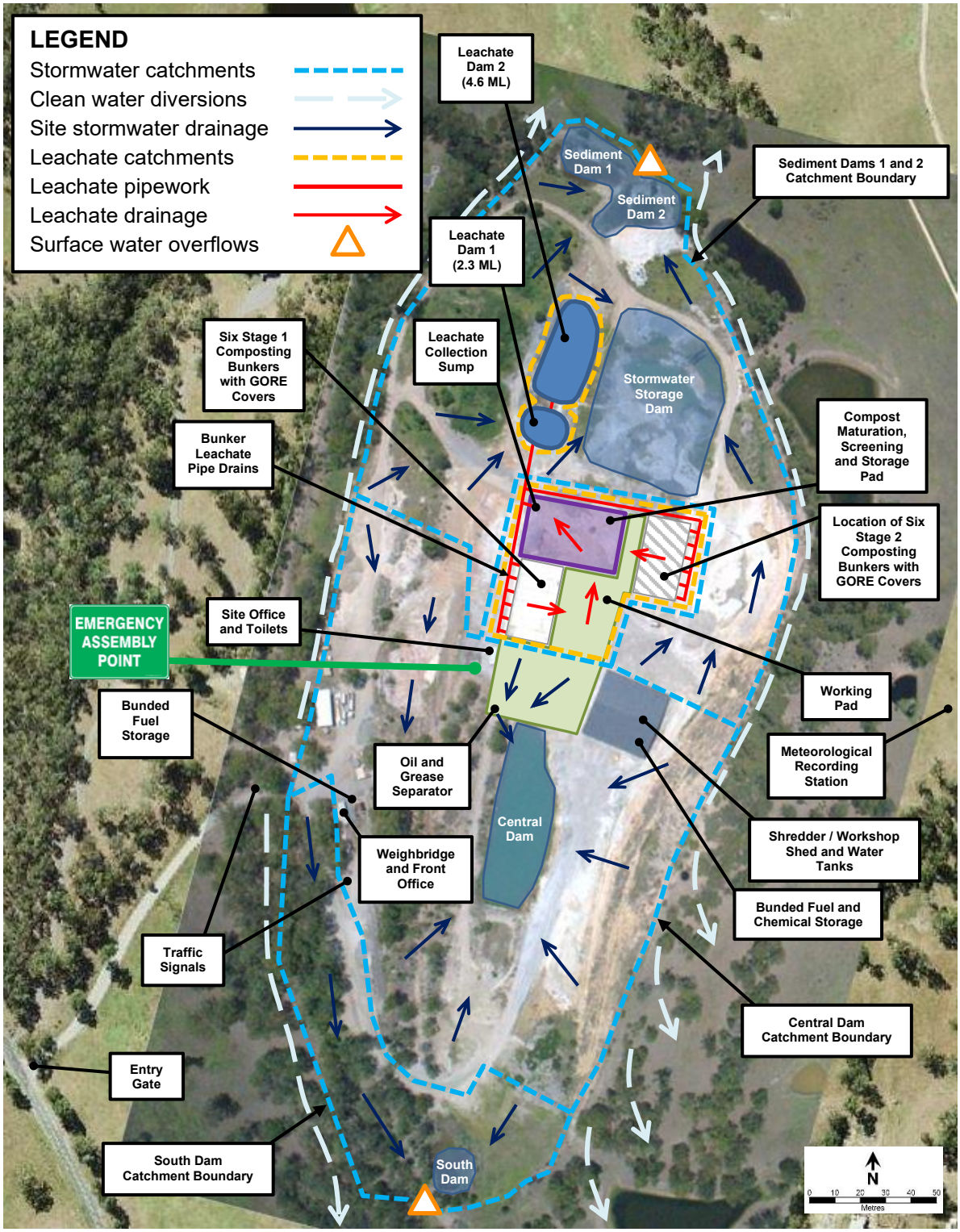

Figure 3 – ROCF operational layout, catchment areas and offsite surface water discharge locations

2.4.1 ROCF Site Description

The ROCF layout is shown in Figure 3. Facility infrastructure consists of:

- site operations and storage office;
- sealed internal access roads (tar seal or stabilised gravel standard);
- Anambah Road intersection upgrade (entry road widening and overtaking lane addition on Anambah Road);
- site entry and road traffic signage;
- entry road security gate;
- weighbridge with boom gates at entry and exit;
- weighbridge office;
- on-slab shed ('the workshop') to house drop-off stockpile, slow speed shredder and workshop;
- exhaust fan fitted to the workshop;
- VapourGard™ odour neutralising technology, including vaporiser unit and piped wall ring for vapour dispersal throughout workshop;
- concrete composting bunkers each of 200 m^2 floor area (8 m x 25 m) and each with a GORE™ cover system (Stage 1 with 6 bunkers; future Stage 2 with 6 bunkers);
- floor-inset bunker air injection system and leachate collection drainage system;
- compost maturation, screening and storage area on 1,350 m^2 stabilised gravel pad (30 m x 45 m);
- Leachate Dam 1 and Leachate Dam 2 (combined 6.9 ML capacity), high-level alarm system, floating pontoon aerator and leachate return pump;
- surface water sediment management dams (Sediment Dams 1 and 2, Central Dam and South Dam) and Stormwater Storage Dam;
- above ground (bunded 110%) diesel storage tanks (2 x 12,000 L) and re-fuelling area;
- oil and grease separator for stormwater at south-east corner of pad;
- submersible pump (25 L/s) on floating pontoon at Central Dam;
- water tanks (4 x 23,000 L) for roof rainwater collection and top-up transfer from Central Dam pump;
- fire-fighting system (2 x high-flow pressurised hose reels at slow speed shedder shed supplied by water tanks, water tanker with water cannon and diesel pump; fire extinguishers at re-fuelling area); and
- pump out toilets at site office.

In addition to fixed plant, mobile plant will be employed at the ROCF to handle solid waste and undertake dust suppression of unsealed trafficable areas.

2.4.2 ROCF Site OEMP

An Operational Environmental Management Plan (OEMP) has been developed by AK Environmental and was submitted to Council prior to the March 2020 commencement of composting operations. The most recent OEMP version (*20241203 2057-1438 AKE REPORT - Anambah Composting Facility OEMP v4.0* – date of issue 3 December 2025) includes management of the processing of mixed residual waste, food wastes manures and biosolids.

3. Operational Risk Management

ROCF operational procedures and design aspects which impact the management of risk at the facility are described to inform the site risk assessment presented in Section 4.

3.1 Liquid Waste Management

In accordance with *Environmental guidelines: composting and related organics processing facilities* (DEC 2004), leachate is all waters which contact compostable organic materials.

Protection of groundwater and surface water is afforded by a leachate management system has been designed, and will be operated, and maintained consistent with the principles and requirements of DEC (2004), and has the following components:

- working surfaces;
- leachate barrier system;
- leachate collection system; and
- leachate storage system.

The raw sewage management system comprises proprietary toilets with sewage containment tanks. Raw sewage will be disposed off-site with no on-site treatment permissible.

Sections 4.2.1 and 4.2.2 of the site OEMP detail the objectives and design considerations which have been applied to management of liquid waste at the ROCF. Operational procedures and responsibilities are detailed in Section 4.2.3 of the site OEMP.

3.2 Solid Waste Management

Restrictions on the type of solid waste permitted to be processed at the ROCF are detailed in Development Approval DA/2015/433:4 which includes processing of up to 40,000 t/a of the following:

- Garden Waste - defined by Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act);
- Wood Waste - defined by Schedule 1 of the POEO Act;
- Natural Organic Fibrous Materials - defined by Schedule 1 of the POEO Act;
- General Solid Waste non putrescible - paper and cardboard;
- Not more than 8,000 t/a derived from food waste (vegetable, fruit, brewery and distillery waste); and
- Not more than 20% of total waste types received of General Solid Waste (putrescible) - mixed residual waste containing putrescible organics.

Compostable materials are categorised by NSW DEC (2004). The ROCF is licensed to process Category 1, 2 and 3 organics.

Further details regarding the ROCF solid waste specifications and management objectives are provided in Sections 4.3.1 and 4.3.2 of the site OEMP.

Operational procedures and responsibilities for the management of solid waste are detailed in Section 4.2.3 of the site OEMP.

3.3 Surface Water Management

Stormwater runoff generated within the ROCF sub-catchment areas shown in Figure 3 will be directed to onsite sediment dams for treatment. The dams are designed to limit the volumetric quantity of downstream surface water releases, and to manage the quality of surface water leaving the site.

Sections 4.5.1 and 4.5.2 of the site OEMP detail the objectives and design considerations which have been applied to management of leachate at the ROCF. Operational procedures and responsibilities are detailed in Section 4.5.3 of the site OEMP.

3.4 Pollutants and Chemicals

Compost leachate and raw sewage from the onsite toilets are the liquid waste pollutants generated by the ROCF which are potentially hazardous to public health and the environment. Liquid waste management of pollutants is detailed in Section 3.1.

The chemicals and fuels listed in Table 1 are stored/used at the site. Diesel fuels are maintained in secured and bunded locations. For those chemicals/fuels which have safety data sheets (SDS), these are kept on site and updated as required (see Appendix F of the OEMP). Safe use of chemicals and spill-handling procedures are in accordance with SDS documentation.

Table 1 – Treatment chemicals and fuels

Chemical/Fuel	Typical quantity	Stored?	Safety Data Sheet kept at site?
Diesel	24,000 L max	Above ground tanks at refuelling area (110% bunded)	Yes
QuikAir 0900V (Vapour Deodouriser)	200 L	In workshop on bunded pallet (110% bunded)	Yes
Oil (Engine/Hydraulic)	50 L	Off-site (plant maintenance vehicle)	Yes
Grease	20 L	Off-site (plant maintenance vehicle)	Yes
Hand soap	20 L	Site office	No

3.5 Groundwater Management

In accordance with findings in *Composting Facility Anambah Road, Anambah, NSW - Surface Water and Groundwater Assessment* (OD Hydrology 2015), groundwater levels are not expected rise to ground surface levels, and hence direct mixing of groundwater and surface water will not occur. Hence, vertical downward infiltration of surface waters is the only potential pathway for pollution of underlying groundwater.

Sections 3.1 to 3.4 cover the management of liquid waste, solid waste, surface water and pollutants and chemicals, and these are all considered relevant to the protection of groundwater. Furthermore, Sections 4.6.1 and 4.6.2 of the site OEMP detail the objectives and operational procedures which have been applied to management of groundwater at the ROCF.

3.6 Air Quality Management

Air quality pollutant types associated with organic composting are dust and odour.

Sections 4.7.1 and 4.7.2 of the site OEMP detail the objectives and design considerations which have been applied to management of dust emissions at the ROCF. Operational procedures and responsibilities are detailed in Section 4.7.3 of the site OEMP.

Sections 4.8.1 and 4.8.2 of the site OEMP detail the objectives and design considerations which have been applied to management of odour at the ROCF. Operational procedures and responsibilities are detailed in Section 4.8.3 of the site OEMP.

3.7 Environmental Monitoring

An on-site meteorological station continuously monitors weather conditions.

Surface water quality and groundwater quality is monitored quarterly in accordance with EPL12510. Groundwater levels are also monitored quarterly.

In accordance with EPL12510, surface water quality and groundwater quality will be monitored on each day that offsite discharges of surface water occur.

Dust monitoring occurs at the three nearest sensitive receptors, each of which located east of the ROCF. The frequency of monitoring is monthly.

Attended noise monitoring is conducted monthly during the first 12 months of operation, after which monitoring would occur quarterly. Additional noise monitoring will be conducted when new or additional composting equipment is commissioned or following a noise-related complaint being received.

Odour monitoring will be enacted in response to an odour complaint from a neighbouring sensitive receptor.

3.8 Fire Management

Management actions which control the potential for fires are:

- maintain machinery in good working order to reduce potential for ignition;
- compost stockpiles are turned regularly until removal from site;
- regular testing of fire hydrants and fire extinguishers; and
- regular site patrols.

3.9 Vandalism

A stock fence is erected at the site boundary and the entry road access is security gated.

ROCF staff are present 7:00am to 5:00pm Monday to Saturday.

Staff are required to remain vigilant to any suspicious behaviour. It is a requirement for staff as soon as they become aware of instances of malicious damage or anti-social behaviour, that Police are notified.

3.10 Safety equipment and PPE

Safety equipment and personal protective equipment (PPE) are provided to workers to minimise the risk to human health and the environment. The purpose of this safety equipment and PPE is to contain, control or prevent contact with potential pollutants.

The following safety equipment is maintained at the premises:

- fire hydrants and high-pressure hoses;
- fire extinguishers and fire blankets; and
- PPE for undertaking of works concerning untreated sewage. Shovels and hand equipment are also available to limit contact with waste material.

The types of PPE kept at site are shown in Table 2, and the locations of firefighting and PPE components are shown in Figure 4.

Table 2 – Personal protective equipment and storage locations

Equipment	Purpose	Location
Safety helmets	Head protection in shredder shed	Site operations/storage office
Prickle proof gloves	Material waste handling	Site operations/storage office
Hi-vis vests	Visible identification	Site operations/storage office
Dust masks	Breathing protection	Site operations/storage office

3.11 Site Inductions

All ROCF staff and contractors conducting work at the ROCF are to be inducted to the site by the ROCF Onsite Manager. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All work carried out will be managed under ROCF's Integrated Risk Management system and prior to completing any task a risk assessment, standard operating procedure and/or safe work method statement will be completed and adhered to.

3.12 Evacuation Procedure

In the event of an emergency, ROCF staff will notify all workers and visitors currently onsite via verbal communication. All staff and visitors are to go to the emergency assembly point, which is located near the site office as shown in Figure 4.

3.13 Training

Training is provided to all ROCF staff conducting work at the ROCF. The nature of the training is determined by the level of risk and likelihood of incidents and is further the position the employee holds. Training is provided with the principle objective of statutory compliance and knowledge and application of procedures and plans. Additional training is provided to supplement knowledge and skills as well as providing breadth knowledge. Training is provided in the form of:

- formal training courses/certificates;
- toolbox talks; and
- internal training on PIRMP and incident response.

All staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner. All staff must be:

- capable of using the fire-fighting equipment;
- capable of identifying potential pollution incidents; and
- familiar with the requirements and procedures contained within this PIRMP.

The staff training register for each position is shown in Appendix A.

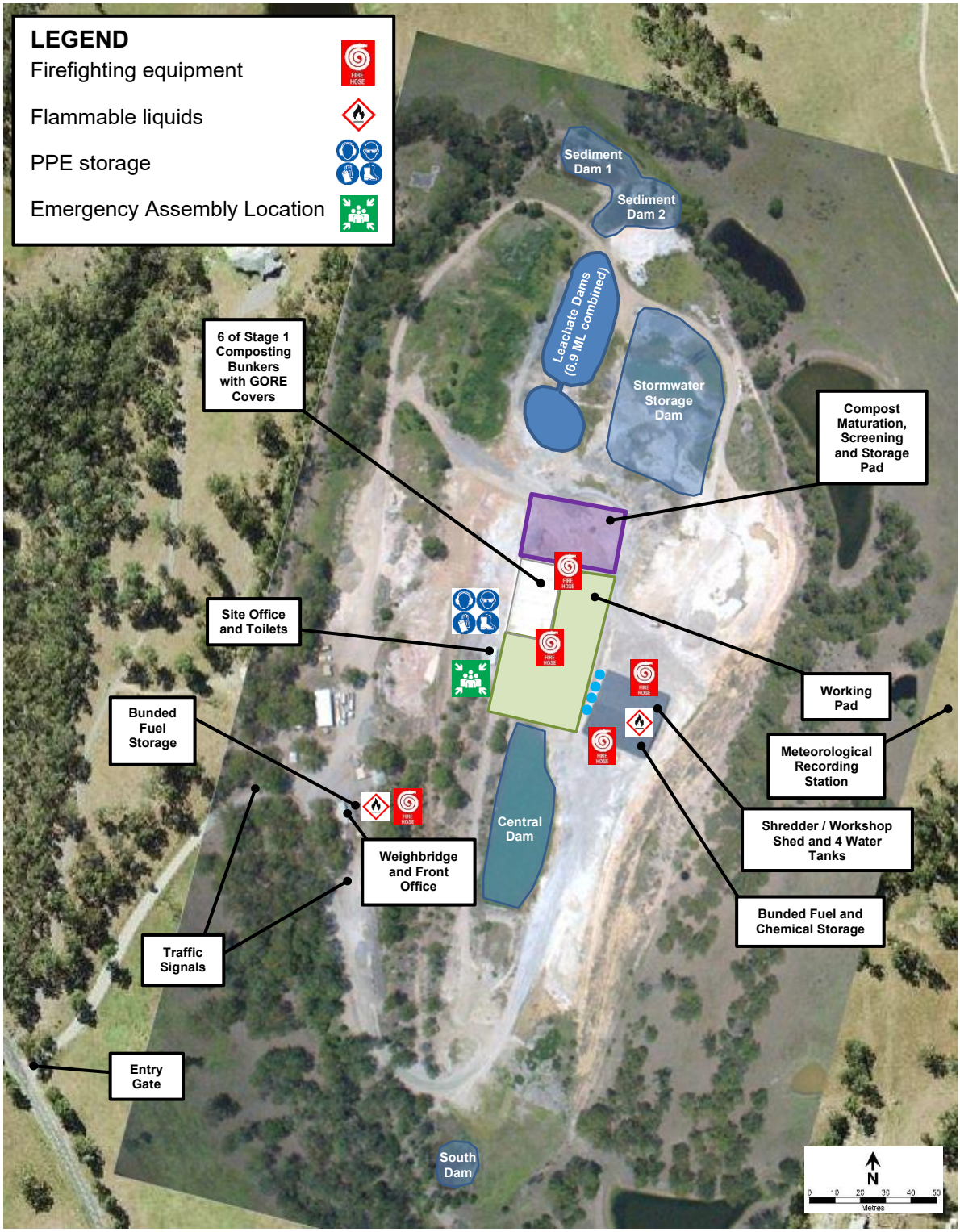

Figure 4 – Site locations of flammable liquids storage, firefighting components, PPE storage and emergency assembly point

4. Risk Assessment

A risk assessment has been undertaken to determine the following:

- identification of hazard events;
- identification of potential exacerbating circumstances;
- documentation of preventative measures and monitoring; and
- assessment of the residual risk (likelihood and consequence).

4.1 Structure of Risk Assessment

The criteria used to undertake the risk assessment is set out in ROCF's Risk Analysis Audit Tables (see Appendix B), including definitions of likelihood, consequence and the resultant risk matrix.

4.2 ROCF Risk Assessment

The risk register is shown in Table 3. The risk assigned to each potential pollution incident event is the *residual risk* when all preventative actions/measures are considered.

Table 3 – ROCF risk matrix

Risk	Causes	Contributing Factor(s)	Likelihood	Consequence	Risk Rating	Controls
Failure of sediment dam system	Structural embankment failure (Sediment Dam 1+2 and South Dam)	Downstream toe scour by overtopping	Rare	Major	**MEDIUM**	• Regular embankment integrity inspections •
		Internal wave-induced erosion	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance
		Seepage/piping embankment weakening	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance, including remove tree seedlings
	Structural embankment failure (Central Dam)	Downstream toe scour by overtopping	Rare	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance
		Internal wave-induced erosion	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance
		Seepage/piping embankment weakening	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance, including remove tree seedlings

Risk	Causes	Contributing Factor(s)	Likelihood	Consequence	Risk Rating	Controls
Failure of leachate barrier system	Structural failure of underlying infiltration control surface	Cracking of concrete pad underlying composting bunkers	Possible	Moderate	**HIGH**	• Regular pad integrity inspections for cracking/leakage potential
		Cracking of concrete pad underlying shredder shed	Possible	Moderate	**HIGH**	• Regular pad integrity inspections for cracking/leakage potential
		Weathering of clay liner under screening and maturation area	Possible	Moderate	**HIGH**	• Regular liner integrity inspections • Routine maintenance
Failure of leachate collection system	Structural failure of composting bunker leachate conveyance network	Collapse of floor drain or underground pipework	Unlikely	Moderate	**MEDIUM**	• Regular integrity inspections
		Inoperable control value	Possible	Moderate	**HIGH**	• Regular testing of valve integrity
	Structural failure of the GORE™ covers	Degradation by weathering and handling	Possible	Minor	**MEDIUM**	• Regular integrity inspections

Risk	Causes	Contributing Factor(s)	Likelihood	Consequence	Risk Rating	Controls
Failure of leachate storage system	Structural embankment failure of leachate dam	Downstream toe scour by overtopping	Rare	Major	**MEDIUM**	• Regular embankment integrity inspections
		Internal wave-induced erosion	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance
		Seepage/piping embankment weakening	Unlikely	Major	**MEDIUM**	• Regular embankment integrity inspections • Routine maintenance
	Overtopping of leachate dam	Discharge permissible above design storm rainfall Extreme rainfall conditions	Rare	Major	**MEDIUM**	• Storage constructed with additional 70% capacity over historical water balance requirement • High-level alarm system • Overflow directed into stormwater sump for containment onsite
Fire	Self-combustion of compost stockpiles	Incomplete waste stockpile handling Excessive period of stockpiling	Possible	Major	**HIGH**	• Continuous composting pile temperature monitoring fitted with high temperature alarm control • Water cart always maintained with a full tank and in-service pump and fire hose cannon
Fuel spill	Ruptured fuel storage container	Container failure Impact by plant	Possible	Moderate	**HIGH**	• Spill kits kept on site • Training of staff in use of spill kits • Regular inspection of storage containers

Risk	Causes	Contributing Factor(s)	Likelihood	Consequence	Risk Rating	Controls
Generation of offensive odour beyond site boundary	Failure of solids management processing	Uncontrolled import of high odour generating putrescible waste from municipal waste facility	Possible	Major	**HIGH**	• Visual inspection of waste feedstock piles at municipal facility prior to loading of in-bound trucks • Continued visual inspection of waste feedstock during the loading process • Reject unsuitable feedstock at municipal facility
		Uncontrolled high odour generation of waste following placement on workshop floor for processing	Possible	Major	**HIGH**	• Ensure VapourGard™ odour neutralising technology is operating as designed • Within 4 hours of any complaint, remove the offending feedstock from site and dispose at licensed municipal waste management facility • If offending feedstock cannot be removed within 4 hours of any complaint, entire feedstock stockpile is to be covered by a minimum of 100 mm of mature compost until loading can commence
		Incomplete aeration of compost stockpiles leading to anaerobic conditions	Possible	Moderate	**MEDIUM**	• Regular scheduled inspections • Regular aeration of composting pile by aeration pump fitted with alarm control • GORE™ covers over composting piles • Regular turning of composting piles
		Incorrect stockpiling of solid wastes	Possible	Minor	**MEDIUM**	• Regular scheduled inspections • Stockpiling limited to 24 hours under normal operating conditions • Removal of offensive odour generating stockpiles as soon as practicable

Risk	Causes	Contributing Factor(s)	Likelihood	Consequence	Risk Rating	Controls
	Failure of leachate management system	Incomplete aeration of leachate leading to anaerobic conditions	Possible	Moderate	**MEDIUM**	• Regular scheduled inspections • Continuous aeration of leachate storage by aeration pump fitted with alarm control
Generation of visible dust plumes crossing site boundary	Failure of solids handling processing	Incorrect handling procedures	Possible	Minor	**MEDIUM**	• Regular scheduled inspections • Material drop-off and shredding conducted only in the shredder shed • Minimisation of drop height for loading/unloading • Efficient pile turning procedures • Strategic watering • Restriction of activities in adverse conditions
		Incomplete covering of loads	Possible	Insignificant	**LOW**	• Signage at entry/exit
Generation of visible dust plumes crossing site boundary (cont.)	Traffic movements generating dust from unsealed and disturbed surfaces	Incomplete moisture management	Possible	Minor	**MEDIUM**	• Regular scheduled inspections • Strategic watering
		Traffic movements on restricted and disturbed surfaces	Likely	Insignificant	**MEDIUM**	• Signage at entry and within site

5. Actions in Response to Pollution Incident

A Pollution Incident Decision Flow Chart is shown in Appendix C. The flow chart is to be used in the event of a pollution incident to ensure all notifications and actions are correctly identified and subsequently enacted.

5.1 Timing of Notification Response

The notification of the relevant authority when material harm to the environment or human health is caused or threatened must be immediate, meaning promptly and without delay. Notwithstanding the requirement for immediacy of the response, priority may still need to be given beforehand to actions which prevent, limit, or make good harm to the environment.

5.2 Responsibilities and Contact Details

When a pollution incident causes or threatens material harm to the environment or human health, it is the direct responsibility of the ROCF Onsite Manager to contact the regulatory authorities listed in Table 4.

For 'notifiable incidents' under the Work Health & Safety Act (2011) NSW, the ROCF Supervisor should immediately contact the Integrated Risk Management Team who will manage the notification to SafeWork NSW.

Table 4 – External Emergency Contact Details

Organisation	Details	Contact Info	Phone
Emergency Services	Police, Fire & Rescue, Ambulance, HAZMAT	Emergency Only	000
NSW EPA	NSW EPA Pollution Line	24 hours	131 555
Fire & Rescue NSW	Pollution Incident Notification	24 hours	1300 729 579
	Rutherford Fire Station	24 hours	(02) 4932 8223
	Fire & Rescue NSW Zone Office Metropolitan North Zone 3	Business hours 8:30am - 4:30pm	(02) 4932 6411
SafeWork NSW		24 hours	13 10 50

Emergency contact details of all responsible ROCF staff are provided in Table 5.

Table 5 – ROCF Emergency Contact Details

Position	Name	Phone
ROCF Directors	Chris Ditton	0407 252 009
	Denise Ditton	0438 326 998
ROCF Onsite Manager	Terry Ditton	0439 989 289

5.3 Relevant Information to be Notified

Section 150 of the POEO Act defines the information which needs to be reported in the event of a pollution incident. The relevant information is:

> *"(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,*

b) 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."

The ROCF Onsite Manager is responsible for supply of this information immediately after the pollution incident is known. If some information is not known to the ROCF Onsite Manager at the time the pollution incident is notified, is the responsibility of the ROCF Onsite Manager to provide the remainder of information immediately after it becomes known.

A Pollution Incident Reporting Form is provided in Appendix D.

5.4 On-site Harm Minimisation Actions

5.4.1 Pollution containment actions

All site personnel with relevant training must make every effort to contain the pollution incident on-site, without putting themselves or others at risk of harm.

In the case of a fire and where safe, trained personnel must attempt to extinguish or contain the fire immediately.

In the event of a chemical spill that is not contained by bunding, the chemical spill kits must be used by trained personnel to restrict the spread of the chemical.

Where a breach of the stormwater sediment management system has occurred, on-site earthworks machinery should be used to contain surface water discharge as far as practicable.

5.4.2 Staff and visitor notification

In the event of a pollution incident, all ACIF staff are to be contacted as soon as is practical via mobile phone (numbers listed in Table 5).

If visitors are present at site, the ROCF Onsite Manager is responsible for notifying visitors of a pollution incident.

All staff and visitors are to be mustered by ROCF staff to the Emergency Assembly Point shown in Figure 4, from which they can be safely evacuated from site as required.

5.4.3 Neighbouring properties notification

In the event of notification of a pollution incident, EPA will determine whether neighbouring properties should be notified. EPA has the formal powers to direct Ditton Properties to make notifications to the neighbouring properties. The six (6) neighbouring properties shown in Figure 2 must be notified by 'door knocking' when direction is received from EPA.

6. Continuous Improvement Process

6.1 Evaluation

This PIRMP is required to be reviewed, tested and updated at least once every 12 months. Following the occurrence of a pollution incident, this PIRMP is to be updated within one month. The review will consist of the following:

- review of the risk assessments for the ACIF against current operations and control measures;
- identification of any additional or emerging issues or trends; and
- determination of priorities in procedural improvements and asset upgrades.

6.2 PIRMP Update

The result of the evaluation will be documented and the PIRMP updated. To ensure clarity regarding the most recent version of the PIRMP, a Document Control is provided at the commencement of this document, and the current version and month of issue are recorded on each page at the bottom left hand corner. The next review date is shown in the Document Control. Each reviewed copy will be kept in ROCF's record keeping system.

6.3 Publication of this PIRMP

A copy of this plan will be issued to relevant ROCF personnel. Copies will be held at the following locations:

- ROCF's record keeping system; and
- ROCF site office.

Under section 74(2)(a) of the General Regulation, if the licensee has a website, the PIRMP must be made publicly available within 14 days after it is prepared in a prominent position on that website. Riverbend Organics maintains a current version of the PIRMP at www.rbquarry.com/About-Us.php.

7. References

DEC (2004). *Environmental guidelines: composting and related organics processing facilities*. Sydney: NSW Department of Environment and Conservation. http://www.environment.nsw.gov.au/resources/composting_guidelines.pdf

OD Hydrology (2015), *Composting Facility Anambah Road, Anambah, NSW - Surface Water and Groundwater* Assessment, doc ref: 44001-rpt01d.docx.

NSW EPA (2022), *Guideline: Pollution Incident Response Management Plans*, Sydney, Australia, September 2022.

Todoroski Air Sciences (2018). *Air Quality and Noise Management Plan - Anambah In-vessel Composting Facility*, 17 September 2018.

Appendix A. Staff Training Register

Staff Training Register

Date	Staff Member	Description of Training
6/11/2026	Chris Ditton	Desktop simulations: • leachate dam wall failure leading to offsite discharge of leachate • diesel fuel spill, containment and clean up • remove odorous stockpile batch from site • spontaneous combustion of stockpile within composting bay • leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
6/11/2026	Terry Ditton	Desktop simulations: • leachate dam wall failure leading to offsite discharge of leachate • diesel fuel spill, containment and clean up • remove odorous stockpile batch from site • spontaneous combustion of stockpile within composting bay • leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
6/11/2026	Heidi Fenwick	Desktop simulations: • leachate dam wall failure leading to offsite discharge of leachate • diesel fuel spill, containment and clean up • remove odorous stockpile batch from site • spontaneous combustion of stockpile within composting bay • leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
6/11/2026	Travis Baird	Desktop simulations: • leachate dam wall failure leading to offsite discharge of leachate • diesel fuel spill, containment and clean up • remove odorous stockpile batch from site • spontaneous combustion of stockpile within composting bay • leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
6/11/2026	Mathew Roberts	Desktop simulations: • leachate dam wall failure leading to offsite discharge of leachate • diesel fuel spill, containment and clean up • remove odorous stockpile batch from site • spontaneous combustion of stockpile within composting bay • leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
3/11/2025	Chris Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
3/11/2025	Terry Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
3/11/2025	Travis Baird	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
3/11/2025	Chris Ditton	Desktop simulation – diesel fuel spill, containment and clean up
3/11/2025	Terry Ditton	Desktop simulation – diesel fuel spill, containment and clean up
3/11/2025	Travis Baird	Desktop simulation – diesel fuel spill, containment and clean up
3/11/2025	Chris Ditton	Desktop simulation – remove odorous stockpile batch from site
3/11/2025	Terry Ditton	Desktop simulation – remove odorous stockpile batch from site

3/11/2025	Travis Baird	Desktop simulation – remove odorous stockpile batch from site
3/11/2025	Chris Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
3/11/2025	Terry Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
3/11/2025	Travis Baird	Desktop simulation – spontaneous combustion of stockpile within composting bay
3/11/2025	Chris Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
3/11/2025	Terry Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
3/11/2025	Travis Baird	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2024	Chris Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2024	Terry Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2024	Travis Baird	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2024	Chris Ditton	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2024	Terry Ditton	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2024	Travis Baird	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2024	Chris Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2024	Terry Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2024	Travis Baird	Desktop simulation – remove odorous stockpile batch from site
1/11/2024	Chris Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2024	Terry Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2024	Travis Baird	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2024	Chris Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2024	Terry Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2024	Travis Baird	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2024	Chris Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2024	Terry Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2024	Travis Baird	Desktop simulation – remove odorous stockpile batch from site

1/11/2024	Chris Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2024	Terry Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2024	Travis Baird	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2023	Chris Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2023	Terry Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2023	Travis Baird	Desktop simulation – remove odorous stockpile batch from site
1/11/2022	Chris Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2022	Terry Ditton	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2022	Travis Baird	Desktop simulation – leachate control system overflow caused by high rainfall leading to offsite discharge of leachate
1/11/2021	Chris Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2021	Terry Ditton	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2021	Travis Baird	Desktop simulation – spontaneous combustion of stockpile within composting bay
1/11/2020	Chris Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2020	Terry Ditton	Desktop simulation – remove odorous stockpile batch from site
1/11/2020	Travis Baird	Desktop simulation – remove odorous stockpile batch from site
1/11/2019	Chris Ditton	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2019	Terry Ditton	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2019	Travis Baird	Desktop simulation – diesel fuel spill, containment and clean up
1/11/2018	Chris Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2018	Terry Ditton	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate
1/11/2018	Travis Baird	Desktop simulation – leachate dam wall failure leading to offsite discharge of leachate

Appendix B. Risk Analysis Audit Tables

Risk Matrix

		Consequence				
		Insignificant	**Minor**	**Moderate**	**Major**	**Catastrophic**
Likelihood	**Almost Certain**	MEDIUM	HIGH	HIGH	EXTREME	EXTREME
	Likely	MEDIUM	MEDIUM	HIGH	HIGH	EXTREME
	Possible	LOW	MEDIUM	MEDIUM	HIGH	HIGH
	Unlikely	LOW	LOW	MEDIUM	MEDIUM	HIGH
	Rare	LOW	LOW	MEDIUM	MEDIUM	HIGH

Risk Levels

EXTREME	The proposed or identified task or process activity cannot proceed. Steps must be taken to lower the risk level to as low as reasonably practicable using a hierarchy of risk controls.
HIGH	The proposed or identified activity can only proceed, provided that: (i) the risk level has been reduced to as low as reasonably practicable using a hierarchy of risk controls; (ii) the risk assessment has been reviewed and approved by the AICF Onsite Manager; (iii) a Safe Working Procedure or Safe Work Method has been prepared; and (iv) the AICF Onsite Manager must review and document the effectiveness of the implemented risk controls.
MEDIUM	The proposed or identifies task or process can proceed, provided that: (i) the risk level has been reduced to as low as reasonably practicable using the hierarchy of risk controls; (ii) the risk assessment has been reviewed and approved by the AICF Onsite Manager; and (iii) a Safe Working Procedure or Safe Work Method has been prepared.
LOW	Managed by documented routine procedures which must include application of the hierarchy of risk controls.

Likelihood Table

Likelihood	Health/Safety	Event Frequency	Industry History
Almost certain	Expected to occur in most circumstances involving normal operations	More than once per year	Expected to occur, occurs regularly in the industry
Likely	Could happen at any time	Once per year	Will probably occur, has occurred many times in the industry
Possible	Could happen sometimes	Once every 10 years	Might occur, has occurred several times in the industry
Unlikely	Could happen, but very rarely	Once every 50 years	Not likely to occur, has occurred once or twice in the industry
Rare	Could happen but probably never will	Less than once every 50 years	May only occur in exceptional circumstances, unheard of in the industry

Consequence Table

Consequence	People	Environmental	Legal
Insignificant	Minor injury, no first aid required	Minimal environmental impact; isolated and immediately reversible	Isolated non-compliance or breach; minimal failure of internal controls
Minor	Minor injury; first aid required	Minor environmental impact; isolated and reversible or localised and immediately reversible	Contained non-compliance or action with short term significance; some impact on normal operations
Moderate	Injury or illness requiring medical attention	Moderate environmental impact; localised and reversible or isolated and irreversible	Significant claim or breach involving statutory authority or investigation; prosecution possible
Major	Significant injury or long term illness; hospitalisation	Significant environmental impact; regional and reversible or localised and irreversible	Major breach with litigation/ fines and long-term significance; critical failure of internal controls
Catastrophic	Fatality; permanent disability, illness or disease	Catastrophic environmental impact; national and reversible or regional and irreversible	Extensive litigation/fines with possible class action; indictable offences

Appendix C. Pollution Incident Response Flow Chart

Pollution identified

Notify ACIF Site Manager immediately

Is it a notifiable 'pollution incident' with risk of material harm to environment and/or human health?

No

Is the pollution fully contained within the site boundary?

No

Follow general management protocols as per the OEMP

Yes

Follow OEMP procedures to make the polluted environment safe

Yes

Is the pollution fully contained within the site boundary?

No

Contact Fire & Rescue NSW immediately on

Call 1300 729 579

Yes

Does an immediate threat to human health or property exist which requires an emergency response?

Yes

Call Emergency Services immediately

Call 000

No

Is an emergency evacuation required?

No

Commence emergency evacuation procedures

Commence actions to make polluted environment safe

Immediately notify these authorities:

Maitland City Council
Call (02) 4934 9700

EPA Pollution Line
Call 131 555

SafeWork NSW
Call 13 10 50

Fire & Rescue NSW
Call 1300 729 579

Ask EPA if notification of neighbours is required?

Yes

Contact all neighbours by 'door knock'

Provide regular updates to notified authorities (and neighbours if notified)

No

Complete Pollution Incident Response Form

Review and update PIRMP within 30 days of pollution incident

Appendix D. Pollution Incident Reporting Form

Pollution Incident Reporting Form

Where details are unknown at the time of the notification write 'unknown' in the relevant box.

Information	Details known at time of notification
Name of person completing form:	
Date / time form completed:	**Date:** **Time:**
Premises details:	**Anambah In-vessel Composting Facility** **442 Anambah Road, Anambah NSW 2320**
Date / time of incident:	**Date:** **Time:**
Specific location of incident:	
Pollutant: **(e.g. Leachate, Odour, Pond Waters …. etc.)**	**Date:** **Volume:**
Pollutant emitted to: **(e.g. Stormwater, Land, Air, Groundwater … etc.)**	
Spatial extent of pollution: **(e.g. area of impacted soil, length of waterway … etc.)**	
Cause: **(e.g. structural failure, mechanical failure, human error … etc.)**	
Weather conditions:	**Rainfall depth (prior 24 hrs) (mm):** **Temperature (deg C):** **Wind direction (from):** **Wind strength (m/s):**

Immediate actions taken in response:	
Forecast / future needs / concerns / considerations:	