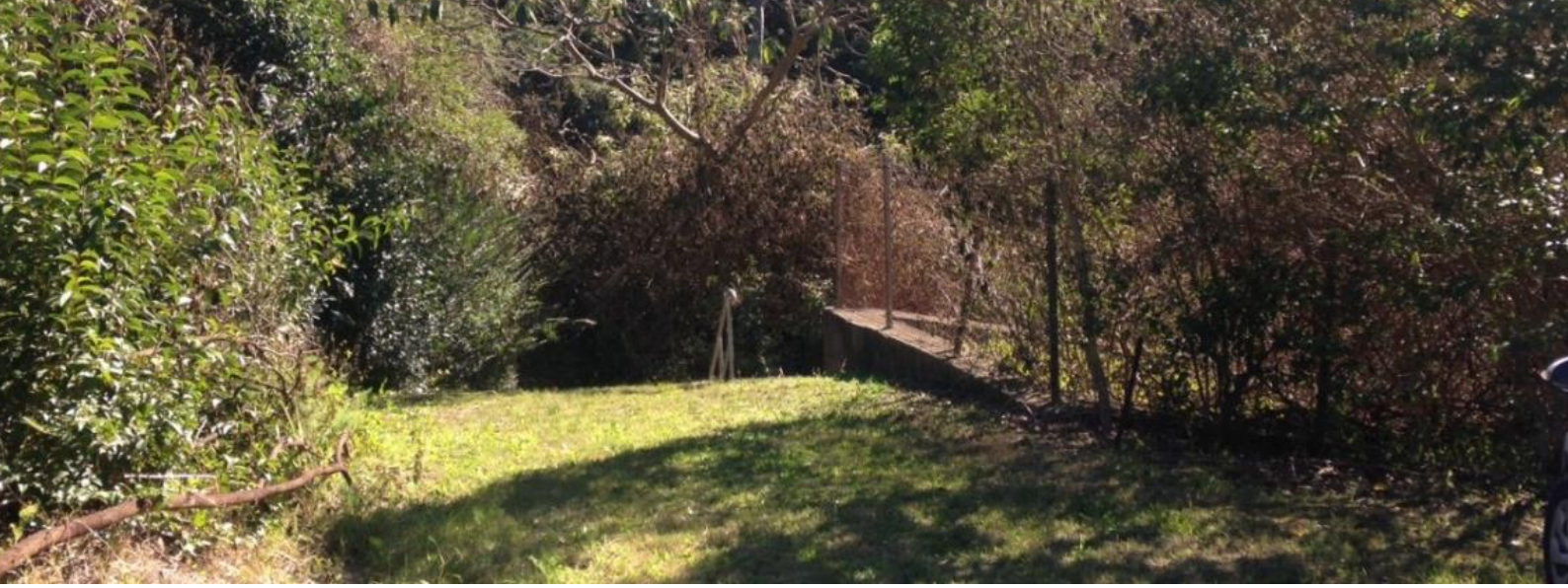

Pollution Incident Response Management Plan

Porters Creek Depot, Wicks Rd,
Macquarie Park

EPL 13044
Feb 2025

City of Ryde
Lifestyle and opportunity
@ your doorstep

Revision 11;
Issued By: J Pucci
Checked By: C Jenns
Date: Feb 2025

1.0 Introduction

The objectives of this Pollution Incident Response Management Plan (PIRMP) are:

- To ensure effective communication about a pollution incident to: staff at the premises, the Environment Protection Authority (EPA), other relevant authorities as appropriate including NSW Ministry of Health, WorkCover NSW, Fire and Rescue NSW and people outside the facility who may be affected by the impacts of the pollution incident;
- To minimise and control the risk of a pollution incident at the facility by identifying risks and establishing planned actions to minimise and manage those risks;
- To identify personnel responsibilities, and ensure that the plan is regularly tested for accuracy, currency and suitability.

Pollution is defined as: "either 'water pollution', 'air pollution', 'noise pollution' or 'land pollution'."

A pollution incident is defined by the EPA 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."

Further, a pollution incident is required to be *notified* if there is a risk of 'material harm to the environment'. Section 147 of the POEO Act states that 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). In this regard, 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.

This plan must be kept on the licensed premises and its contents must be understood by supervisors and staff responsible for managing or day-to-day running of the site.

Reference should also be made to Section 7 of the Porters Creek Site Environmental Management Plan (SEMP).

The requirements of the PIRM Plan as defined in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation are addressed below.

2.0 Hazards Identification and Actions [clauses 98C (1)(a),(b),(c),(j)&(l)]

Identified hazards and associated required actions are identified in Table 1, below.

Note: that in case of emergency such as fire, release of chemical fumes or explosion, all staff are to assemble at the emergency evacuation point located at the front gate of the site, on Wicks Road. See Figure 1a for evacuation point location.

Table 1: Hazards and actions

Hazard	Trigger Events & Likelihood	Pre-Emptive Action	Measures To Minimise Harm To Environment or Persons	Actions To Be Taken During or Immediately After Pollution Incident
Significant spillage of polluting fluids on site, including but not limited to vehicle fluids.	Accidental spillage during refuelling. Worn hydraulic or fuel hoses on plant. Low Likelihood	Do not store large quantities of potentially hazardous liquids on site. Ensure plant refuelling is done with care / under controlled conditions. For small engines fuel on level ground next to container close to spill kit. Large plant refuelled with dedicated fuel truck with spill kit and trained personnel. This is also carried out on level ground. Minimise storage of plant fuels and oils on site. Maintain site vehicles.	No clean-up attempts for unidentified substances to be made by site staff. If safe, minimise further release. Clean-up attempts for identified substances to be made with appropriate personal protective equipment (PPE) Located in the office as well as with the spill kit located in the container near the weighbridge. Following spill, remove any contaminated soil under plant in leak area and appropriately dispose.	Identify source of spill and prevent further spillage as far as is practical. If appropriate, apply absorbent material or catch tray as appropriate (spill containment measures). Remove any contaminated soil and appropriately dispose. Notify site manager and Council's environmental engineer or representative. Craig Jenns 0466 393839 Julius Pucci 0434 568 038. Front-end-loaders available to create emergency bunding if needed. Product such as sandstone or bedding sand can be used. If incident represents an immediate threat to the environment or human health or property, call the fire brigade on 000 and call the EPA on 131555 to give details of the incident. Where appropriate notify other relevant authorities (Contacts in Section 6, below). eg Fire Brigade, SES
Discovery of contaminated material on site, including but not limited to asbestos-containing materials or odorous material	Accidental contamination of incoming loads eg with asbestos fibro. Accidental acceptance of incoming contaminated soil Low-med likelihood	Inspect all loads of concrete, asphalt and soil entering the site for visible contaminants. Signage at front gate prohibiting tipping of contaminated material. Follow incoming load inspection flow chart displayed in office. Inspect on weighbridge with cameras and visual inspection, inspect when tipping load, sort and then stockpile.	No clean-up attempts for unidentified substances to be made by site staff. Clean-up attempts for identified substances (eg minor non-friable asbestos fibro finds) to be made with appropriate PPE, eg P2 mask, gloves and disposable Tyvek suit if needed – locations in Table 3. For larger (non-friable) asbestos finds call Monzer Charif - Senior Coordinator Public Domain 0418 869 113. Section off area that contains asbestos until qualified assistance arrives. For friable finds call occupational hygienist.	Notify site manager and Council's environmental engineer or representative. Cordon off area to prevent accidental access and to minimise disturbance. If appropriate, spray the material with water (eg twice daily) to minimise potential for dust. Arrange for removal of contaminated material. If off-site impacts or environmental harm are likely, the site manager or Council's environmental engineer should notify the EPA. Call Monzer Charif Public Domain Senior Co-ordinator 0418 869 113. Public Domain are qualified to remove small non-friable fragments of asbestos. Follow instructions from Public Domain asbestos checklist and record in Asbestos register. Notify source company.

Hazard	Trigger Events & Likelihood	Pre-Emptive Action	Measures To Minimise Harm To Environment or Persons	Actions To Be Taken During or Immediately After Pollution Incident
Uncontrolled (dry weather) release of leachate collected from the site	Pump failure Controller failure Pipe failure Power Failure Low likelihood	General inspection for routine operation and unintended leachate leakage / spill three times per week. Two-monthly inspection of leachate tanks and pumps. Regular automated pumping of leachate to sewer, with manual override available. Regular analysis of leachate. Maintain water level alarms and remote notification infrastructure. Annual hazardous tree and branch check. Installation of backup generator and pump.	Ensure release is stopped as soon as possible to minimise harm to the environment.	Notify site manager and Council's environmental engineer or representative. If release is caused by failure of *both* lower pumps, pump out lower tank by alternate means, eg with pump trailer or Council's sweeper, and transfer to upper tanks. If release is caused by failure of *both* upper pumps, or a transfer-to-sewer problem, then a liquid waste contractor can be called to draw from upper tanks. If incident represents a threat to the environment call the EPA on 131555 to give details of the incident
Excessive dust exiting the site – eg from aggregate recycling	Hot/dry conditions Inadequate addition of water to crushing process. Low-med likelihood	Maintain routine dust control measures including water cart spraying of access ways. During concrete and asphalt crushing periods maintain damp feed material by wetting loading face, ensure other sprayers functioning as intended. Maintain low vehicle speeds. Stop crushing during hot dry windy days.	Site manager / supervisor to issue half-face particulate dust masks to site staff working in dusty conditions. PPE located in office. Additional dust suppression spraying to be undertaken in dusty conditions. CoR water truck and two trailers with 3500 litre tanks and spray units are available.	Cease any mechanical operations which may be generating the dust until dust issue is resolved. Notify site manager and Council's environmental engineer or representative. Additional dust suppression spraying to be undertaken. Check that crusher water sprayers are operating. Employ on-site water spray trailers in addition to routine measures if necessary. If dust suppression measures do not alleviate dust issues then suspend crushing until conditions and measures allow.

Hazard	Trigger Events & Likelihood	Pre-Emptive Action	Measures To Minimise Harm To Environment or Persons	Actions To Be Taken During or Immediately After Pollution Incident
Fire, including vehicle, stores or other.	Vehicle faults. Accidental storage of easily combusted material in store. Vandalism. Low likelihood	Maintain site vehicles. Vehicles to be serviced as per manufactures recommendations to ensure reliability. Plant undergo daily checks for worn parts etc. Do not store large quantities of fuel or oils on site (not required as direct refuel truck comes to site, and only minimal fuel stored for small engines. Ensure plant refuelling is done with care / under controlled conditions – ie on level ground next to the container with fuel and spill kits. Maintain fire extinguishers. Maintain existing site security by closing gates and restricting access to site.	No clean-up attempts for unidentified substances to be made by site staff. If safe, minimise potential for release of contaminating liquids. Clean-up attempts for identified substances to be made with appropriate personal protective equipment (PPE) Gloves, safety glasses, suits, masks all located in office and with spill kit. If evacuation required, assemble at muster point located at front gate (see Figure 1a). Communication on site is by way of two-way radios kept by all staff, plus by mobile phone as an option. There is a record of people on site if needed.	Call fire brigade. If safe, prevent spillage of contaminants if any, as far as practical. If appropriate, apply absorbent material (spill containment measures). Ensure site man ager is aware (Craig Jenns 0466 393839), and notify Council's environmental engineer (Julius Pucci 0434 568038) or representative. If incident represents an immediate threat to the environment, call the EPA on 131555 to give details of the incident. Where appropriate notify other relevant authorities (Contacts below). As well as spill kits Porters have two water trainers with pumps, a water cart, multiple fire extinguishers that are regularly tested and tagged, two front end loaders capable of extinguishing fire with bedding sand stored on site.
Sediment-laden run-off or stormwater exiting the site.	Storage areas for erodible stockpiled material not being adequately directed to internal surface drainage system. Wet weather causing cohesive material to stick to vehicle tyres. Low-medium	Maintain on-site surface water management measures – eg for handling areas, roads and other unsealed surfaces. All stockpiled materials and materials which may be subject to erosion should be protected from erosion – eg maintaining dish drains / forming berms to redirect surface flow away from stockpiled materials and/or the erection and maintenance of silt fencing. Sand bags are available in container and 5mm agg in hopper to fill.	If appropriate, erect silt fencing to contain area / material of concern. Suspend entry of vehicles to site if conditions become too wet to control tracking out of mud on tyres on roads.	Suspend entry of vehicles to site if conditions become too wet to control tracking out of mud on tyres on roads. Call sweeper truck to clean up mud on road if needed. Restrict access to muddy areas on site. If appropriate, erect silt fencing to contain area / material of concern. Front-end-loaders available to created emergency bunding if needed. Sand bags available on site if appropriate.

Hazard	Trigger Events & Likelihood	Pre-Emptive Action	Measures To Minimise Harm To Environment or Persons	Actions To Be Taken During or Immediately After Pollution Incident
		Ensure internal site roads are covered with suitable material such as roadbase, so that mud is not picked up by vehicle tyres.		
Report of Noise Pollution	Excessive noise from periodic crushing, or loading / unloading of materials.	Commission crushing contractors with modern crushing plant meeting sound level criteria. Minimise noise from loading, eg not dropping heavy materials noisily into trucks.	If noise is potentially excessive, cease operations temporarily to investigate.	Suspend noise-generating work until noise issue is rectified or further assessed and noise levels deemed acceptable.

3.0 Maps [clause 98C(1)(k)]

Figure 1a, below, shows the site and surrounding land uses. The creek (purple line), which passes through culverts underneath the site, exits to the north- east. Onsite stormwater / runoff management drains shown in blue.

Figure 1a: Premises and surrounding area.

Figure 1b, below, shows the site, primary water courses, and potential pollution receivers should a pollution incident occur.

The primary environmental receptor of note is considered to be Porters Creek and Lane Cove River, approximately 275m downstream of the subject site. Previous testing has indicated that ammonia (a common leachate-related contaminant) attenuates in creek water concentration significantly within around 100m of the site, and is at background levels before it enters Lane Cove River. Nonetheless, other contaminants, eg associated with an atypical pollution incident, have the potential to significantly impact waterways downstream of the site.

Figure 1b: Premises and surrounding potential pollution receptors. Receptors were identified based on proximity to site and prevailing hotter wind directions.

4.0 Inventory of Pollutants [clause 98C(1)(d) and (e)]

'Collected leachate', as tabulated below, refers to seepage water collected and stored during normal weather conditions in concrete tanks at the bottom of the site in the north-west portion. The flow of this water is ongoing. In wet weather, following filling of the holding tanks, dilute leachate flows out of the site with stormwater.

Table 2: Inventory of Pollutants

Potential Pollutant	Location	Quantity
Collected Leachate	North-west portion	80,000 L
Vehicle fluids	In vehicles and small amounts in storage containers	Amount in vehicle tanks plus nominal reserve amount in vehicle / tool store (up to approx 40L stored in containers) Mix of petrol, two stroke and diesel.
Dust	Various, including crushing areas	Various, depending on temperature and ground moisture (controlled as necessary, as described in EMP)
Bulk and crushed asphalt	East and north portion of site	27,000t
Bulk and crushed concrete	North-east portion of site	27,000t
Mulch	Central portion of site	500t
Soil	Central north-east portion of site	Not exceeding remainder, noting total wastes stored on site must be <77,900t.
Collected stormwater	Central-north portion of site	150,000 L

5.0 Safety Equipment [clause 98C(1)(f)]

Identified potential pollution incidents and associated safety equipment are tabulated below.

Table 3: Safety Equipment

Pollution Incident Type	Equipment / Clean-up Actions	Location Equipment Stored
Vehicle fluid Spill	Cease flow of fuel / oil as soon as possible. Use spill kit as appropriate. Fix vehicle / plant appropriately before resuming operations.	Vehicle tool store and weighbridge office.
Fire	For small fires easily extinguished, use fire extinguishers on site. For larger fires call Fire Brigade 000, and if safe use fire extinguishers on site until emergency services arrive.	Spill kit located in storage container, fire extinguishers located around offices and in all plant, PPE located in office (eye wear, gloves, suits, ear protection, hi vis, sun block, hand sanitiser, etc.
Dust	Cease dust-causing works; Wear half-face particulate dust masks in dusty conditions. Additional dust suppression spraying to be undertaken in dusty conditions.	P2 Masks and protective eye wear in Weighbridge office; Water cart stored on site at Porters Creek as well as two trailers with water spray units.
Asbestos / Contamination Finds	Clean-up attempts for identified substances (eg minor non-friable asbestos fibro finds) to be made with appropriate PPE Section off area that contains asbestos until qualified assistance arrives. For friable finds call occupational hygienist.	P2 mask, gloves and disposable tyvek suits located in weighbridge office. Star pickets, star picket driver and tape located in the container adjacent to weighbridge office.
Stormwater Runoff	If appropriate, erect silt fencing to contain area / material of concern.	Silt fencing and sand bags located in the container adjacent to weighbridge office.
Normal flow (Dry Weather) Leachate Discharge	Identify equipment fault. Switch to reserve pump if necessary. Switch to manual operation if necessary.	Reserve pumps are plumbed in, and located in both upper and lower leachate pump sheds [contact Council's building maintenance officer for assistance – see Section 6]

6.0 Contact Details [clause 98C(1)(g) and (h)]

Depending on the type of incident, the relevant initial combat agency in Table 4 must be contacted, followed by all other relevant authorities.

Table 4: Contact details

Incident Type	Organisation	Contact Number
Human injury	Ambulance	000
Environmental Harm	EPA	131 555
Fire or explosion	Fire Brigade	000
Hazardous spill	Fire Brigade	000
Potential danger to surrounding sites	Police	000
CPB Lease Site Contact: Anthony Lyons	CPB	0448 058427
Council Contacts:		
Site Manager – Craig Jenns	Council	0466 393839
Environmental Engineer – Julius Pucci	Council	0434 568038
Senior Coordinator Buildings, Property Management – Jon Sorbara	Council	0419 411825
Asbestos finds: Monzer Charif	Council	0418 869 113

Dependant on the nature of the pollution incident, the standard procedure for communications with Council staff and authorities, if and as required, is as follows:

- Site Manager - responsible for activating the PIRMP, and authorised to notify relevant authorities and responsible for managing the response to a pollution incident. (Craig Jenns - 0466 393839) or representative (eg acting site supervisor)
- Environmental Engineer (Julius Pucci - 0434 568038) or representative (eg environmental advisor) to be made aware of the pollution incident.
- Site Manager or representative makes contact with the authorities listed below relevant to the incident.
- Site Manager and Environmental Engineer (or representatives) coordinate response with authorities and arrange for clean-up contractors if appropriate and/or third party consultants if appropriate.

- If incident does or could result in environmental harm – phone EPA Environment Line on 131 555
- If appropriate, contact the Ministry of Health via the local Public Health Unit: Parramatta Office – phone BH 9840 3603 or AH 9845 5555 and ask for Public Health Officer on call.
- If appropriate contact Safework NSW – phone 13 10 50
- **For leachate issues:** Senior Coordinator Buildings, Property Management – Jon Sorbara 0419 411825.
- Fire and Rescue NSW – phone 000.

7.0 Communication with Surrounding Land Users [clause 98C(1)(i)]

Mechanisms that will be used for providing early warnings and information regarding incidents to owners and occupiers of surrounding premises are summarised in Table 5, below.

Table 5: Communication with Surrounding Premises

Surrounding Land User	Communication Method	Possible Advice / Instructions
Lane Cove National Park and users	Phone call to 9888 9133 or 0409 609343, followed by email to: lccp@environment.nsw.gov.au	Dependant on situation (no likely scenarios identified)
Neighbouring Commercial Businesses (eg Cleanaway)	Cleanaway Gen Telephone 86454304	Dependant on situation
M2 Motorway	Telephone 9086 6482 or 0448 298082, followed by email as advised by M2 operator	Dependant on situation
Residents, eg at West Killara across the valley	Letterbox drop, door-knock in case of emergency	Dependant on situation (no likely scenarios identified)

8.0 Staff Training [clause 98C(1)(m)]

Training of staff with regard to this plan will include:

- Introductory briefing of all site staff on contents of plan by Site Manager or their representative;
- Periodic updates to staff during site meetings on any changes to the plan;
- Annual refresher to all site staff;
- Recording training sessions on the Porters Creek staff training register.

9.0 Plan Maintenance

This plan must be tested within twelve months of the last test date to ensure all information within is current and valid. Review details can be recorded in Table 6. A test template is provided in Appendix A.

Table 6: Revision and Test record

Revision Event Number	Date	Revision / Test Details	Test Officer	Document Revision
4	March 2019	Fig 1 and contact details update, inclusion of Table 6.	NA	J Pucci
5	25 May 2021	Test and review / formatting of contents, addition of fire as potential hazard and emphasis of plan testing requirement.	C Jenns and Porters Ck Staff	J Pucci
6	15 Oct 2021	Revisions to Address EPA Audit feedback	NA	J Pucci
7	3 Dec 2021	Revisions to address EPA Audit feedback	NA	J Pucci
8	17 March 2022	Test conducted 16 Mar 2022: Sweeper truck added, Suez updated, muddy area restriction	C Jenns, Porters Ck Staff & J Pucci	J Pucci & C Jenns
9	16 Mar 2023	Test conducted 16 Mar 2023. Updated Figure 1a.	C Jenns, Porters Ck Staff & J Pucci	J Pucci & C Jenns

		Note regarding advising suppliers of contaminated loads.		
10	25/3/2024	Test conducted March 2024. Site map updated to reflect new lease area.	C Jenns, Porters Ck Staff & J Pucci	J Pucci & C Jenns
11	12/2/2025	Test conducted Sept 2024 – spillage of hydraulic oil scenario.	C Jenns, Porters Ck Staff & J Pucci	J Pucci & C Jenns

A copy of the following staff acknowledgement table should be kept on site to be filled in by relevant staff, as a record that this PIRMP has been read and understood.

Table 7: Record of Staff Acknowledgement of Plan Contents:

Position	Name	Date	Comment
Construction Recycling Manager	Craig Jenns	12/2/2025	
Environmental Engineer	Julius Pucci	12/2/2025	
Plant Operator	Isabella Minty	28/03/24	
Plant operator	Brendan Lamont	28/03/24	

APPENDIX A:

Porters Creek Depot PIRMP Test and Training Record Form

Note that the type of testing should reflect:

- *the nature of activities undertaken at the premises;*
- *the environmental context – ie location, sensitive waterways (Porters Ck and Lane Cove River), air quality, land habitat, nearby neighbours.*

Test Details:

Site:	Porters Creek Depot
Address:	Wicks Road, Macquarie Park
Test Date:	
Test Scenario Pollutant(s):	Dust / Vehicle Fluids / Leachate / Other (Specify): _____
Test Scenario Description(s):	(e.g. discharge, spillage, contamination, etc.)

If applicable, mark on map below the location of the pollution incident with a X:
(or drag and drop the red X on the left)

PIRMP Contact List Check:

Point of Contact	Verified as part of this test? (please tick)	Updates or Amendments to PIRMP (if applicable)
Emergency Services (Police, Fire, Ambulance)		
NSW EPA		
Ministry of Health via local Public Health Unit (Parramatta)		
SafeWork NSW		
Council's Site Manager		
Council's Environmental Representative		
CoR Maintenance Officer (for Leachate issues)		
Lane Cove National Park		
Neighbouring Businesses		

Pollution Incident Test Check:

Please complete checks below in relation to scenario selected.

Test Item	Test Result (Yes/No)	Details or Comments	Follow-up Action (if applicable)
Is the selected pollutant(s) and scenario(s) adequately listed within the PIRMP?			
Is the description and likelihood of the hazard(s) correct and relevant in the PIRMP?			
Are the Pre-Emptive Actions listed still correct and applicable?			
Are the Measures to Minimise Harm to Persons listed still correct and applicable?			
Are the Reactive Actions listed still correct and applicable?			
At the time of this test, are the PPE required to handle/control/clean-up the pollution available on site?			
Are the contacts who need to be contacted for selected pollution incident listed in PIRMP?			

Staff toolbox meeting and post-test debrief outcomes:

What aspects of our response were particularly effective?	
What would we do differently next time?	
What needs did we identify? (e.g. staff training, safety procedures, additional equipment)	
Describe changes made to the PIRMP or test form in response to testing (include new version and date).	
Date(s) when the PIRMP has been made available and the name of the recipient (eg EPA officer during a site inspection).	

PIRMP Test and Training Participants

Name:	Title:	Date:

Following completion of this test form, file in Content Manager (Container: _____) and update Testing History table in PIRMP.