Transport Pollution Incident Response Management Plan

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1.0 Introduction

1.1 Background

Enviroking Pty Ltd operates the Enviroking Liquid Waste Facility at 843 John Renshaw Drive, Blackhill, in the Cessnock City Council area. The facility receives, treats, and reuses liquid waste by land application and irrigation under specific exemptions, or disposes of it at landfills, sewage treatment plants, or other licensed facilities.

The facility operates under an Environment Protection Licence (EPL 11180) (Appendix A) issued by the NSW Environment Protection Authority (EPA), in line with the Protection of the Environment Operations Act 1997 (POEO Act).

The requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2022 (POEO(G) Regulation). This Transport PIRMP has been prepared by SLR Consulting on behalf of Enviroking having regard to the POEO Act and the POEO(G) Regulation as in force at the time of preparation. EPA guidelines have been used to inform the preparation of this Transport PIRMP, noting that guidance material does not override legislative requirements and may be updated from time to time.

This Transport PIRMP addresses the transportation of materials into and out of the site and applies from the point of departure from site to delivery at the receiving facility or location and vice versa. A separate management plan covers pollution incident response for all premise-based activities.

Enviroking is dedicated to identifying environmental risks that may occur during transport into and out of the site and implementing effective procedures to minimise these risks. All employees are expected to actively cooperate with the Transport PIRMP to safeguard health, safety, and the environment for themselves and others. Employees are required to follow response priorities and report unsafe conditions to their supervisor. The Transport PIRMP's effectiveness will be regularly reviewed.

1.2 Scope

This Transport PIRMP has been prepared in accordance with the requirements of Part 5.7A of the POEO Act, the POEO(G) Regulation and conditions of EPL 11180 (O1.1 b), which stipulates transport of waste must be carried out in a competent manner. The scope of this plan is to address the statutory requirements for managing and responding to pollution incidents related to the transport and loading / unloading of waste. This includes on public roads, customer sites and waste disposal facilities / areas. A separate PIRMP covers all premise-based activities.

The following sections outline how this Transport PIRMP meets each specific requirement of the Act and Regulation:

- Duty to Prepare and Implement Pollution Incident Response Management Plans (POEO Act Section 153A)
- Information to be Included in the Plan (POEO Act Section 153C, POEO(G) Regulation (clause 72)) and the form of the information included POEO(G) Regulation (clause 71).
- Keeping of the Plan (POEO Act Section 153D)

- Testing of the Plan (POEO Act Section 153E, POEO(G) Regulation (clause 72(l))
- Implementation of the Plan during a pollution incident that causes actual or potential material harm to the environment (Section 153F)

The Transport PIRMP focuses on minimising the risk of pollution incidents and effectively managing any that occur, ensuring the health and safety of drivers, road users, nearby neighbours, workers and the environment. All drivers transporting waste or materials to and from the Enviroking site are considered part of 'Enviroking' for the purposes of this Transport PIRMP. The notification procedures for pollution incidents that cause or threaten actual or potential material harm are detailed in the Transport PIRMP, in accordance with the POEO Act. Notification under this Transport PIRMP is required where there is a reasonable possibility of material harm, even if harm has not yet occurred.

In the event of a pollution incident that causes or threatens material harm to the environment, this Transport PIRMP must be implemented immediately to manage and mitigate the impacts. The plan outlines specific responsibilities and actions to be taken promptly to address the incident.

As per Section 153C of the POEO Act, Table 1 contains all the required information included in the Transport PIRMP, along with the relevant sections where each requirement is addressed.

Table 1: Document Directory

Detail Required	Section in PIRMP
Protection of the Environment Operations Act 1997 No 156 (POEO Act)	
Part 5.7A Duty to prepare and implement pollution incident response management plans: **153C - Information to be included in plan** A pollution incident response management plan must be in the form required by the regulations and must include the following:	
a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to— I. the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and II. the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and III. any persons or authorities required to be notified by Part 5.7,	Section 4.0
b) A detailed description of the action to be taken immediately after a pollution incident, by the holder of the relevant EPL to reduce or control any pollution.	Section 4.5
c) The procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.	Sections 3.1, 4.1, 4.2, 4.3, 4.4 and 4.5
d) Any other matter required by the regulations (as set out below)	
Protection of the Environment Operations (General) Regulation 2022	
Chapter 4 Pollution incident response management plans: **72 General licences—additional matters to be included in PIRMP—the Act, s 153C** For the Act, section 153C(d), the following matters must be included in a PIRMP	

Detail Required		Section in PIRMP
a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates (the **relevant activity**),	Section 2.3
b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Section 2.3
c)	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,	Section 2.4
d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Section 2.2
e)	The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,	Section 2.2
f)	A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,	Section 2.5
g)	The names, positions and 24-hour contact details of those key individuals who: I. are responsible for activating the plan, and II. are authorised to notify relevant authorities under section 148 of the Act, and III. are responsible for managing the response to a pollution incident,	Section 3.3
h)	The contact details of each relevant authority referred to in section 148 of the Act,	Section 4.1
i)	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,	Section 4.4
j)	The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,	Section 4.3
k)	A detailed map (or set of maps) showing:	
	• the location of the premises to which the licence relates,	Section 2.1
	• the surrounding area that is likely to be affected by a pollution incident,	Section 2.1
	• the location of potential pollutants on the premises and	NA for transport activities
	• the location of any stormwater drains on the premises,	NA for transport activities
l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,	Section 4.0
m)	The nature and objectives of any staff training program in relation to the plan,	Section 5.1
n)	The dates on which the plan has been tested and the name of the person who carried out the test,	Section 5.2
o)	The dates on which the plan is updated,	Section 5.2
p)	the way in which the PIRMP must be tested and maintained.	Section 5.3
73(1) the names positions and 24-hour contact details of each individual who is – (i) responsible for activating the PIRMP, or (ii) authorised to notify relevant authorities under the Act, section 148, and (iii) responsible for managing the response to a pollution incident,		Section 3.3
(b) the contact details of each relevant authority referred to in the Act, section 148,		Section 4.1

Detail Required	Section in PIRMP
(c) a community engagement protocol that includes procedures for notifying people living or working near a pollution incident and keeping them informed of relevant matters,	Section 4.4
(d) details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of that activity, including, as a minimum, action that complies with any requirements set out in of the Protection of the Environment Operations (Waste) Regulation 2014), clauses 70, 72 and 73,	Section 2.4
(e) the nature and objectives of a staff training program in relation to the PIRMP,	Section 5.1
(f) the dates on which the PIRMP has been tested and the name of the person who carried out the test,	Section 5.2
(g) the method for testing and maintaining the PIRMP.	Section 5.2
74(1) A PIRMP must be made readily available (a) to an authorised officer on request, and (b) to a person who is responsible for implementing the PIRMP at the premises— (i) to which the relevant licence relates, or (ii) where the activity takes place.	Section 5.4
74(2) A PIRMP must be made publicly available in the following way within 14 days after it is prepared— (a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRMP, (b) if the person does not have a website—by providing a copy of the PIRMP, without charge, to a person who makes a written request for a copy.	Section 5.4
75(1) A PIRMP must be tested— (a) routinely at least once every 12 months, and (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.	Section 5.2
75(2) The test must be carried out in a way to ensure the following— (a) the information included in the PIRMP is accurate and up to date, (b) the PIRMP is capable of being implemented in a workable and effective way	Section 5.2

1.3 Definitions

In implementing this Transport PIRMP, the POEO definitions included in Table 2 below applied in the event of an incident.

Table 2: Definition

Terms	Definition as defined in POEO Act 1997
Pollution	"Pollution means – water pollution, or air pollution, or noise pollution, or land pollution"
Pollution incident	"Pollution incident means an incident or set of circumstances during or as a consequence of which, there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise".

Terms	Definition as defined in POEO Act 1997
Material Harm	As defined in Section 147 of the Act: 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.

2.0 Transport Activity Details and Operational Context

2.1 Overview

Enviroking Liquid Waste Facility, operated by Enviroking Pty Ltd undertakes the transport of liquid waste using tankers and associated vehicles across public roads, customer premises, and waste disposal facilities.

The relevant activities to this Transport PIRMP undertaken by Enviroking include loading, transporting, unloading and disposing of liquid waste. This Transport PIRMP applies to all roads used by vehicles travelling to or from Enviroking, as well as at the various facilities these vehicles pick up waste from and any landfill, sewage treatment plants or other licensed facilities the vehicles might dispose of waste at.

Waste from the premises may be transported to and from various sites throughout the Cessnock LGA or to the broader region, generally within 130 km of the site. Drop-off locations consist of various environments including urban, industrial and rural settings.

Enviroking is permitted to treat and transport up to 20,000 tonnes of liquid waste per year under the current Environment Protection License (EPL 11180) (Appendix A) and operates under development approval 07_0048 granted under section 75J of the Environmental Planning and Assessment Act 1979 (EP&A Act).

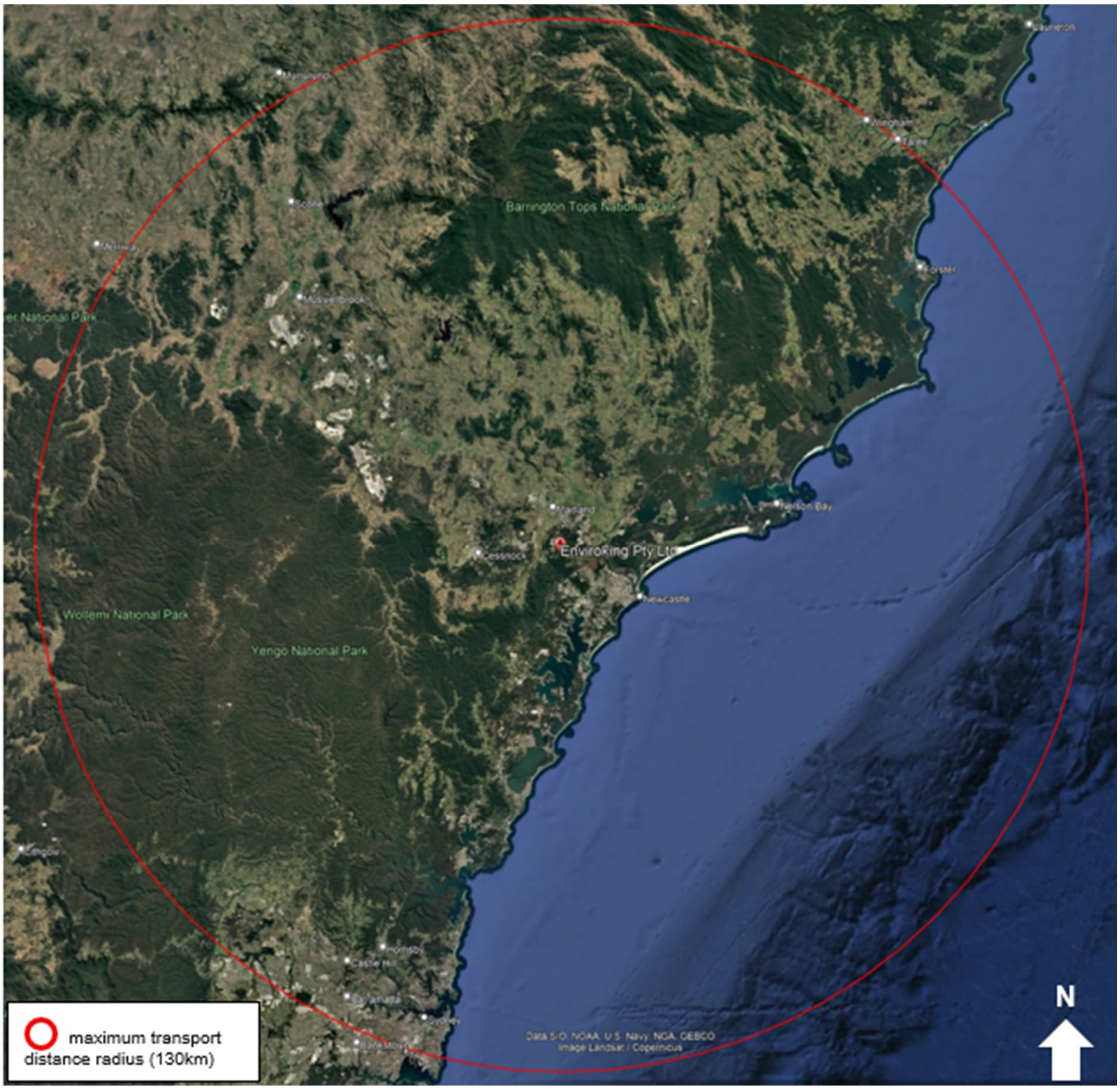


Figure 1 Site context showing approximate maximum distance travelled

2.2 Hazardous Substances and Pollutants

A summary of hazardous substances and pollutants that are transported to and from the site are listed in Table 3. Safety Data Sheets (SDS) for each of the materials must be available and within the PIRMP records. Movements of trackable waste (e.g., grease trap waste and oily waters) are recorded in the EPA Integrated Waste Tracking Solution; other streams are transported with manifest and classification records. SDS for all transported materials are available on driver tablets (offline cached).

Table 3: Hazardous Substances and Pollutants

Waste stream	Typical vehicle class	Trackable waste (Y/N)	SDS availability (location)
Grease trap waste	Semi-tanker; Vacuum tanker	Y	Digital SDS (tablet, in cab)
Liquid food waste	Semi-tanker	N (generally)	Digital SDS (tablet, in cab)
Oily waters	Semi-tanker	Y	Digital SDS (tablet, in cab)
Treated grease trap water	Semi-tanker	N (generally)	Digital SDS (tablet, in cab)
Sludge (liquid/slurry)	Vacuum tanker	May be Y depending on classification	Digital SDS (tablet, in cab)
Hydrated lime (solid, palletised)	Flatbed/box truck	N	Digital SDS (tablet, in cab)

2.3 Potential Hazard

This section addresses the requirements of Clause 72 of the Protection of the Environment Operations (General) Regulation (POEO(G) Regulation) 2022. Table 4 provides a summary of potential hazards identified in relation to the transport of waste to and from the site. It includes details on conditions or events that could increase the likelihood of these hazards occurring.

The purpose of this risk assessment was to identify the potential major hazards and/or risk(s) posed by the transport of waste to and from the site, the controls in place to effectively mitigate and/or manage these risks and the key pollution response measures. The identified hazards, along with the conditions or events that could elevate the risk, have been meticulously evaluated to ensure effective management and mitigation strategies are in place. This proactive approach is crucial for minimising potential environmental impacts and ensuring the safety of all stakeholders.

Table 4: Hazard Likelihood

Potential Hazard and Consequence	Likelihood of Occurrence	Events that could increase likelihood
Vehicle collision; causing impacts to human health, life and the surrounding environment	**Unlikely**	• Driver fatigue • Driver negligence • Poor road condition • Extreme weather
Traffic incident causing spillage of waste, impacting human or ecological health	**Unlikely**	• Driver fatigue • Driver negligence • Poor road condition • Extreme weather
Tank rupture leading to spillage of chemicals, impacting the environment	**Unlikely**	• Faulty equipment • Improper servicing schedule • Negligence
Dust or mud tracking from vehicles off site causing impact to human health and the environment	**Moderate**	• Dry weather (dust) • Unsatisfactory vehicle washdown • Wet weather (mud)

Potential Hazard and Consequence	Likelihood of Occurrence	Events that could increase likelihood
Hose or valve failure during loading or unloading, causing spillage and impact to human health and the environment	Unlikely	• Faulty equipment • Improper servicing schedule • Operator negligence
Uncovered or improperly covered load being discharged into the air and affecting human health and the environment	Unlikely	• Operator negligence • Faulty equipment
Incorrect dumping leading to contamination of uncontaminated areas, impacting human health and the environment	Moderate	• Operator negligence • Improper training
Excessive or out of hours noise emissions impacting the environment and human health	Unlikely	• Improper training • Operator negligence

2.4 Pre-Emptive Actions

Pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising from potential or actual pollution events are listed in Table 5.

Table 5: Pre-Emptive Actions

Aspect	Pre-emptive Actions / Controls
Vehicle collision	• Train drivers in incident awareness and hazard perception. • Encourage fatigue management procedures and work/rest limits. • Conduct pre-start vehicle inspections (brakes, tyres, lights). • Plan routes to avoid high risk routes where practicable. • Enforce speed limits and safe driving policies. • Prohibit mobile phone use while driving (except hands-free).
Traffic incident	• Plan transport routes considering traffic conditions, road class, and weather. • Avoid peak congestion periods where possible. • Maintain communication between drivers and operations. • Ensure vehicles are clearly marked and compliant with road transport requirements. • Train drivers in incident awareness and hazard perception.
Tank rupture	• Routine inspection and maintenance of tanks, fittings and structural components. • Use compliant, engineered tankers suitable for each waste type. • Ensure all systems are functional. • Avoid overfilling tanks (use fill level controls/visual checks). • Conduct periodic integrity testing of tanks. • Secure tank mountings to prevent movement during transit.
Dust or mud tracking	• Inspect tyres and vehicle condition before leaving loading/unloading locations. • Avoid operating in extreme unsuitable weather where tracking risk is very high. • Use designated access/egress points at client sites where available. • Carry basic cleaning equipment (e.g. shovel, broom) for minor cleanup if required. • Educate drivers on identifying and minimising track-out risks.
Hose or valve failure	• Pre-use inspection of hoses, couplings, seals, and valves. • Use rated hoses and fittings suitable for transported liquids. • Replace worn or damaged components immediately. • Secure hoses during transport to prevent damage.

Aspect	Pre-emptive Actions / Controls
	• Use locking or fail-safe valves where possible. • Train drivers in correct connection/disconnection procedures.
Uncovered or improperly covered load	• Ensure all tank lids, caps, and access points are properly sealed before departure. • Conduct departure checks to confirm load security. • Use appropriate covers, seals or locking mechanisms. • Train drivers to verify load containment before and during transport. • Implement checklist sign-off before leaving any loading location.
Incorrect dumping	• Train drivers with documented instructions specifying approved dumping method / locations. • Verify disposal site details before discharge. • Require driver confirmation (e.g., docket, manifest, GPS verification) prior to unloading. • Provide training on waste classification and acceptance requirements. • Maintain communication with operations for clarification before discharge if uncertain.
Noise Emissions	• Maintain vehicle engines, exhausts and equipment to reduce excessive noise. • Avoid unnecessary idling (implement no idling policy). • Schedule transport activities and make drivers aware of approved operating / departure hours. • Train drivers in minimising operational noise (e.g., gentle braking, avoiding harsh acceleration). • Use compliant noise control devices on vehicles.

2.5 Safety Equipment

A range of safety equipment must be available in trucks to minimise health and safety risks during operations and in response to incidents. The inventory of in-truck safety equipment, along with their descriptions, locations, and maintenance schedules, is detailed in Table 6. Where equipment is listed as N/A, risk assessment confirmed alternative controls are adequate.

Table 6: Inventory of Safety Equipment

Equipment	Description / Purpose	Requirement
	Emergency Equipment	
Fire Extinguishers	Portable devices used to extinguish fires. *Serviced 6 monthly.*	Must be kept in truck ready for use at all times.
First Aid Kit	Medical kits containing first aid supplies used in the control and management of injuries associated with emergencies.	Must be kept in truck ready for use at all times.
	Spill Control Equipment	
Spill Kits	Contains equipment for containing, controlling and cleaning-up oil and chemical spills.	Must be kept in truck ready for use at all times.
Portable pumps and hoses	Can be used to clean up spilled liquids.	Must be kept in truck ready for use at all times.

Equipment	Description / Purpose	Requirement
Absorbent materials	To be used to absorb spills where appropriate.	Must be kept in truck ready for use at all times.
Drain covers	To cover stormwater drains where required at a pollution incident.	Must be kept in truck ready for use at all times.
Personal Protective Equipment		
Protective clothing	Long leg / long sleeve hi-vis clothing for general wear when working around plant, equipment and within waste processing facilities.	Must be worn at all times when outside of truck.
Protective footwear - general	Steel capped / steel shanked covered and water-resistant footwear (boots) for general wear when working around plant, equipment, within wastewater treatment facility.	Must be worn at all times when outside of truck.
Protective gloves – chemical	Chemical resistant gloves / gauntlets for use when handling chemicals and other hazardous substances.	Must be worn when handling chemicals / hazardous substances including collecting samples, operating hoses, valves, etc.
Protective gloves – cuts & abrasions	Puncture / cut resistant gloves to protect hands when using hand tools or performing other work that presents risk of hand injury (cut, abrasion, pinch, puncture etc).	Must be worn when loading / unloading or carrying out tasks that may pose a risk of cuts or abrasions.

3.0 Management and Responsibilities

3.1 Duty to Notify

Drivers travelling to and from Enviroking are responsible for alerting site management of all environmental incidents or hazards, regardless of the nature or scale of the observed incident or event. A licensee is required to notify the relevant regulatory authorities of a pollution incident immediately after becoming aware of the incident if the incident causes or threatens to cause material harm to the environment.

Enviroking adopts the responsibilities as defined in Section 148 of the POEO Act. Incident notifications are categorised as:

- Duty of employee or any person undertaking an activity:

  Any person engaged as an employee or undertaking an activity must, immediately after becoming aware of any incident or potential incident, notify their relevant manager of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority in accordance with the process outlined in Table 9.

  The required information includes:

  (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) any other relevant information.

- Duty of the employer or occupier of a premises to notify:

  An employer who is notified (or otherwise becomes aware) of a pollution incident, must immediately notify the appropriate regulatory authority of any incident that has caused or threatens to cause material harm to the environment, including relevant information.

  For the purposes of this Transport PIRMP, notification will occur where there is a reasonable possibility of material harm, including where harm is only potential or the full extent of harm is not yet known. The Workplace Health and Safety (WHS) Manager listed in Table 7 is responsible for notification of the relevant authorities.

3.2 Material Harm Assessment Checklist

The following checklist can be used to determine if an incident is classified as material harm according to Section 147 of the POEO Act and requires the notification procedure to be carried out.

- Has the pollutant spilled onto the road, roadside areas or any other outside environment?
- Has the pollutant entered, or is it likely to enter any drains, stormwater or any waterways?
- Is there potential to impact road users, neighbouring properties or any other sensitive receivers?
- Has containment failed or is active intervention required?
- Could the cost of response and clean-up exceed $50,000?

If YES to any of the above, the incident must be treated as material harm and the notification procedure must be carried out immediately.

3.3 Enviroking Staff Responsibilities

If a mobile pollution incident constitutes material harm to the environment, as defined in Section 1.3, the Enviroking Management listed in Table 7 will implement the Transport PIRMP immediately.

Table 7: Enviroking Staff Responsibilities and Contacts

Person	24-hr contact details	Responsibility
All drivers	Kept in internal Enviroking document	• In control of incidents that occur offsite / during transit until relieved • Immediately notify Enviroking management if an incident or potential incident has occurred • Authorised to notify the EPA and the relevant authorities if Enviroking management contacts not available

Person	24-hr contact details	Responsibility
		• Carry out the appropriate actions during a pollution incident, listed in Section 4.2.
[redacted] **Managing Director**	[redacted]	• Provide adequate financial resources, qualified personnel, and training to ensure implementation of environmental management plans. • Overall business management. • Assisting in communication with relevant authorities, communities, and staff. • Supporting activation of Transport PIRMP immediately where an incident has caused or threatens to cause material harm to the environment. • Incident control • Supporting activation & implementation of response to Environmental Incident.
[redacted] **Workplace Health and Safety (WHS) Manager**	[redacted]	• Notification of Authorities under the Transport PIRMP immediately where an incident has caused or threatens to cause material harm to the environment • Main point of contact for agency liaison. • Assist in notification of potentially affected sensitive receivers if required. • Prepare incident reports in conjunction with Environmental Advisor. • Provide environmental assistance and advice on legislative requirements for any impacts. • Ensuring all staff and contractors on site are aware of the Transport PIRMP and adequately trained in its procedures and duty to notify / report incidents immediately. • Determination of material harm incident.
[redacted] **Plant Operator/Driver**	[redacted]	• Conduct regular checks to verify that equipment is functional and accessible. • Ensure the availability and maintenance of pollution response equipment, such as spill kits, and personal protective equipment (PPE).
[redacted] **Environmental Advisor**	Sydney Environmental and Soil Laboratory Pty Ltd [redacted]	• Notification of Authorities. • Prepare compliance reports in conjunction with WHS Manager that are required as a result of the incident. • Provide environmental assistance and advice on legislative requirements for any impacts. • Ensuring all staff and contractors are aware of the Transport PIRMP and adequately trained in its procedures and their duty to report incidents immediately.

The personnel listed above are available 24 hours per day and are responsible for:

- Activating the Transport PIRMP
- Notifying relevant authorities
- Managing the response to actual and potential pollution events

If an actual or potential incident that threaten or causes material harm occurs offsite / during transit, Enviroking management will immediately initiate the Transport PIRMP (refer to Section 4.0 for Incident Notification and Response actions).

3.4 General Roles and Responsibility

Table 8 lists general roles within the organisation and their broader responsibilities related to the Transport PIRMP.

Table 8: General Roles and Responsibility

Role	Responsibility
All employees and contractors	• Ensure familiarity, implementation, and compliance with this plan. • Support commitments to environmental management and compliance. • Work in a manner that will not harm the environment or others. • Report all environmental incidents, potential incidents, complaints, or inappropriate practices immediately to the WHS Manager.

4.0 Incident Management

4.1 Immediate Notification

If a pollution incident occurs that causes or threatens to cause material harm to the environment (as defined in s147 of the POEO Act and Section 1.3 of this PIRMP), Enviroking must immediately implement this Transport PIRMP (s153F POEO Act) and notify each relevant authority without delay (s148 POEO Act)."

If there is an immediate threat to life or property:

1. An emergency will be declared
2. Emergency services (000) will be contacted first
3. Emergency services will take control of the scene
4. Immediate notification under this Transport PIRMP is required where there is a reasonable possibility of material harm, including where harm is only potential, the full extent of harm is not yet known, or pollution remains contained onsite.

Upon identification of a pollution incident that causes or threatens material harm to the environment, all relevant authorities listed in Table 9 must be notified immediately and without delay, in accordance with Section 148 of the POEO Act. Notification must occur as soon as practicable after becoming aware of the incident and must not be delayed gathering further information.

Table 9 lists the contact details and the order of the regulatory authorities that must be notified immediately in the event of a pollution incident at the site. Enviroking will provide the following information to agencies:

(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) any other relevant information.

Table 9: Regulatory Authorities Contact Details

Relevant Authority	Key Contact	Notification Process	Contact order
		Emergency Contact	
Emergency Services NSW Police NSW Fire and Rescue NSW Ambulance	000 131 444 (02) 9265 2999 (02) 9320 7777	To be contacted **first** if the incident presents an immediate threat to human health or property and emergency services are required.	1 (if required)

Relevant Authority	Key Contact	Notification Process	Contact order
Enviroking management	See contact details in Section 3.3.	Contact WHS Manager first. If not available, contact Managing Director. If neither available, the staff member is authorised to proceed with the below notifications.	2
NSW Environment Protection Authority (EPA)	131 555 info@environment.nsw.gov.au	To be contacted immediately (after emergency services, if required). This will result in the incident being recorded and the appropriate person being contacted. Record the EPA event ID provided as it is required for other notifications.	3
NSW Safe Work	131 050 contact@safework.nsw.gov.au	Select option for notification of reportable incident. Provide EPA event record ID if requested. Record notification reference number if provided.	4
The local council where pollution incident occurred	Cessnock City Council: (02) 4993 4100 Maitland City Council: (02) 4934 9700 Newcastle City Council: (02) 4974 2000 Port Stephens Council: (02) 4988 0255 Central Coast Council: (02) 4306 7900 Search NSW Office of Local Government directory for other LGAs (https://www.olg.nsw.gov.au/public/local-government-directory)	Contact customer service. Record notification reference number if provided.	5
Additional Contacts (if required)			
Hunter Water Emergency	1300 657 000	Contact customer service and record notification reference number if provided.	
Ausgrid Emergency (24 hours)	13 13 88		
State Emergency Services	132 500		

Relevant Authority	Key Contact	Notification Process	Contact order
Department of Primary Industries	(02) 4931 6656		

4.2 Actions During a Pollution Incident

During an actual or potential pollution incident, Enviroking will respond immediately to prevent or reduce any adverse environmental impact.

The Transport PIRMP will be activated where an incident has caused or threatens to cause material harm to the environment, in accordance with the POEO Act. The driver of the truck involved in the incident is responsible for carrying out the Transport PIRMP procedure once it is triggered. The Transport PIRMP should be carried out in liaison with the WHS Manager. The WHS Manager is responsible for ensuring that all drivers are trained appropriately.

In the event of a spill or other incident during transport the driver must follow these steps:

1. Protection of Human Life and Safety

- The driver must assess the scene and ensure their own safety and the safety of others.
- If there is any risk to life or serious injury, emergency services (000) must be contacted immediately.
- The driver must establish an exclusion zone where safe to do so, using hazard lights and warning triangles and maintaining safe distances from traffic and spilled material.
- Members of the public must be kept away from the affected area until it is safe.

2. Securing the Vehicle and Source Control

- The vehicle must be safely stopped, secured, and isolated (e.g. engine off, brakes applied).
- Where safe, the driver must identify and stop the source of the spill or release by:
    - Closing valves
    - Uprighting hoses
    - Isolating damaged components
- Any actions must only be undertaken if safe and within the driver’s level of training.

3. Containment and Environmental Protection

- Immediate action must be taken to contain and limit the spread of pollutants using on-board spill response equipment. This may include:
    - Deploying absorbent materials
    - Placing drain covers over nearby stormwater pits
    - Creating temporary bunds using absorbent materials or soil (where safe and practicable)
- Priority must be given to preventing pollutants from entering:

  - Stormwater drains
  - Waterways
  - Sensitive environments (e.g. creeks, vegetation, public land)

4. Traffic and Public Risk Management

- If the incident affects traffic, the driver must:
  - Warn approaching vehicles where safe
  - Notify emergency services for traffic control support
- The driver must not attempt to manage traffic unless it is safe and does not place them at further risk.

5. Notification and Coordination

- The driver must immediately perform notification in accordance with Table 9 including:
  - Emergency services (if required)
  - Enviroking management
  - NSW EPA Environment Line where material harm is suspected
- The driver must provide accurate information including location, type of substance, estimated quantity, and actions taken.
- Upon arrival, emergency services take control of the scene; the driver must cooperate fully and provide relevant information.

6. Ongoing Harm Minimisation

- Continue to monitor the incident area and maintain containment measures until relieved by emergency responders or qualified personnel.
- Additional resources (e.g. vacuum trucks, spill response contractors) must be mobilised as directed by Enviroking management or authorities.
- Prevent re-entry of pollutant into the environment during clean-up and recovery.

7. Post-Incident Safety and Environmental Protection

- Ensure all contaminated materials are collected and disposed of at an approved facility.
- The vehicle must not be returned to service until it is safe and any defects are rectified.
- Any exposed or affected areas must be left in a safe and stable condition.

4.3 Minimising Harm

All drivers must complete induction training before delivering to or from Enviroking. The induction covers procedures for preventing pollution incidents, notification processes, incident management, and post-incident actions. Training records are kept at Enviroking.

During a pollution incident, minimising harm to people is the top priority. The actions during a pollution incident in Section 4.2 have been designed to minimise harm with an emphasis on public safety and environmental containment and must be followed.

All staff are instructed to notify management of any actual or potential environmental incident and take immediate action (where it is safe to do so) to prevent, contain and/or minimise the environmental impact of the incident

An honest assessment of the situation must be carried out and documented to minimise the potential for similar events in the future.

Every environmental incident is to be recorded in an Environmental Incident Report, a template for which is in Appendix B. A copy of the completed form should be sent to the contacted authorities and be maintained for at least four years.

Key aspects of the Transport PIRMP will be shared with staff and contractors. The Transport PIRMP will be tested annually, as detailed in Section 5.2.

4.4 Community Notification

Due to the mobile nature of transport incidents, pre-defined receptor distances and fixed community zones are not used in this Transport PIRMP. Instead, affected persons will be identified dynamically at the time of the incident based on location, environmental conditions and advice from emergency services. Where a transport incident may affect owners/occupiers near the licensed premises at 843 John Renshaw Drive, Enviroking will apply the neighbour notification procedure in the Premises PIRMP.

In the event of an actual or potential pollution incident, Enviroking has established the following processes for contacting the local community.

1. **Consultation with Regulatory Authorities**
   - WHS Manager will consult with regulatory authorities to determine if the community should be notified. Community notification must be undertaken where offsite impacts that could affect the community occur. Consultation will not delay immediate early warnings to properties assessed as high risk.
   - The most appropriate communication strategy will be discussed with the authorities (e.g. media release, direct contact with potentially impacted individuals). Messages will be aligned with EPA/FRNSW directions.
2. **Determining the Response and Notification Process**
   - All aspects of the pollution event will be considered, such as the type and extent of pollution.
   - Notification strategies may include door knocking, letter drops, phone calls, SMS, or email (where contact details are available), and notifications via social and mass media, as appropriate. Each message will include incident type and location (GPS/road), pollutant involved, practical protective actions (e.g., avoid area, close windows, remain indoors), and a contact number.
3. **Community members at risk**
   - Notification of community members at risk shall be undertaken at the determination of Enviroking Management. Determination will be risk based on considering materiality of the event, incident type and prevailing conditions.

Table 10 provides a risk-based notification strategy based on communication zones. Upon identification, during and following a pollution incident, the following actions must be taken.

Table 10: Risk Based Notification Strategy

Stakeholders	Notification Method	Information to be provided
High risk		
Adjacent residents	Early warnings through immediate direct verbal warning by emergency services or the driver if safe Emergency service announcements	Practical actions to be taken to minimise the risk of harm to health and property (this can include avoiding the affected area, closing windows and doors and remaining inside to avoid emissions, avoiding using water from creeks/rivers or groundwater depending on the type of incident) Ongoing information and updates will be provided accordingly
Road users in the immediate vicinity	Traffic control and road closures implemented by authorities	Advice to road users to avoid the affected area, potential alternative routes, do not get out of the car if in or near affected area, keep windows up if affected by emissions
Personnel on site (if spill is at a client or third-party site)	Early warnings through immediate direct verbal warning by emergency services or the driver if safe	Practical actions to be taken to minimise the risk of harm to health Avoid the affected area and evacuation orders if required Ongoing information and updates will be provided accordingly
Industrial, commercial, residential or community premises within the immediate vicinity of the site	Call immediately and if unanswered leave a message Updates: follow up phone calls to all landholders who may have been notified by the initial early warning.	Practical actions to be taken to minimise the risk of harm to health and property (this can include closing windows and doors and remaining inside to avoid emissions, avoiding using water from creeks/rivers or groundwater depending on the type of incident) Ensure ongoing information and updates will be provided accordingly
Moderate risk		
Residents and businesses outside of the immediately affected area but who have the potential to enter the area	Direct verbal warning by emergency services or the driver if safe Emergency service announcements	Advice to avoid the affected area Ensure ongoing information and updates will be provided accordingly
Lower risk		
Broader community	Media releases coordinated by authorities Updates via company or authority communication channels including information sheets, newsletters or other appropriate strategies	The nature of the incident and type of pollutant involved The location and extent of the affected area Potential risks to health, property, or the environment Prevailing winds / conditions and magnitude of emissions Recommended actions for the public (e.g. avoid area, remain indoors) Contact details for further information (e.g. Enviroking or relevant authority) Ensure ongoing information and updates will be provided accordingly

4.5 Actions Following a Pollution Incident

In the event following a pollution incident, a detailed incident investigation will be completed as soon as practicable by the WHS Manager (or delegate) and a report will be sent to the Managing Director.

A detailed incident report will be sent to the EPA and relevant agencies where required under the POEO Act or at the request of a regulatory authority, which outlines the following:

- date, time, and nature of the pollution incident.
- the cause (or likely cause) of the pollution incident.
- describing what action has been taken to date.
- describing proposed measures to address the pollution incident and prevent recurrence.

Enviroking will also participate in any external investigation processes conducted by regulatory authorities, if required.

Within a month following a pollution incident, the Transport PIRMP will be reviewed and tested where required. Enviroking will continue to liaise with the relevant authorities to reduce the likelihood of incident recurrence.

All drivers will receive the necessary refresher training where relevant, and the key outcomes of the incident investigation will be reported to staff as part of continuous improvement.

Table 11 details actions to be taken following particular types of pollution incidents.

Table 11: Actions Following Particular Incidents

Type of Pollution	Action During	Action After
Spill / Leak to Road (Minor, Contained)	• Stop vehicle safely and activate hazard lights. • Identify and stop source (close valves, secure hoses). • Deploy spill kit to contain and absorb material. • Protect nearby drains using drain covers if safe. • Notify WHS Manager and assess if material harm criteria are met.	• Collect and dispose of contaminated absorbents at an approved facility. • Inspect vehicle and repair defective components. • Complete incident report. • Review cause and implement corrective actions (e.g. maintenance, training).
Major Spill / Tank Rupture	• Stop vehicle and ensure personal safety. • Call 000 if risk to life, traffic hazard, or large-scale spill. • Establish exclusion zone and keep public away. • Attempt source isolation if safe (e.g. close valves).	• Engage spill response contractors and recovery vehicles. • Remove contaminated soil/material and dispose appropriately. • Repair or replace damaged tanker. • Participate in regulatory investigation and reporting. • Review and update risk controls and maintenance procedures.

Type of Pollution	Action During	Action After
	• Notify EPA and Enviroking management immediately. • Do not attempt containment beyond capability.	
Spill Entering Drain or Waterway	• Immediately stop discharge if possible. • Deploy drain covers, absorbents or diversion controls. • Notify EPA immediately (material harm likely). • Notify emergency services if required. • Prevent further release from vehicle. • Alert site/contact personnel if at third-party premises.	• Engage specialist environmental contractor for clean-up. • Monitor affected area as directed by authorities. • Provide detailed incident report to EPA. • Review route planning and spill prevention controls.
Vehicle Collision (No Spill)	• Ensure driver safety and check for injuries. • Contact emergency services if required. • Secure vehicle and scene (hazards on). • Inspect tanker for leaks or damage. • Notify WHS Manager. • Alert site/contact personnel if at third-party premises.	• Arrange vehicle recovery and inspection. • Repair any damage before returning to service. • Complete incident investigation. • Review driver training, fatigue, and route risks.
Vehicle Collision with Spill	• Follow collision response (call 000, secure area). • Assume spill risk – isolate leak if safe. • Establish exclusion zone. • Notify EPA and Enviroking management immediately. • Assist emergency services as required.	• Full clean-up and environmental remediation. • Regulatory reporting and possible investigation. • Vehicle removal and repair. • Review driver performance, fatigue, and controls.
Hose / Valve Failure During Loading or Unloading	• Stop transfer immediately. • Shut valves and isolate source. • Contain spill using onboard equipment. • Alert site/contact personnel if at third-party premises. • Notify Enviroking management and	• Clean up and dispose of contaminated materials. • Replace faulty hose/valve before further use. • Review inspection and maintenance procedures. • Record incident and corrective actions.

Type of Pollution	Action During	Action After
	assess need for EPA notification.	
Incorrect Discharge / Dumping at Wrong Location	• Stop discharge immediately. • Contain material if possible. • Alert site/contact personnel if at third-party premises • Notify WHS Manager and relevant client site contact. • Notify EPA if material harm is possible. • Follow instructions from management and authorities.	• Recover material where practicable. • Arrange appropriate disposal at approved facility. • Report incident to EPA if required. • Review procedures for load verification and documentation.
Dust or Mud Tracking onto Public Roads	• Identify affected area. • Notify WHS Manager. • Implement immediate clean-up where safe (minor cases). • Install warning controls if road hazard present.	• Arrange road cleaning (sweeper or contractor). • Review site exit procedures at loading/unloading locations. • Identify and implement additional controls (e.g. tyre cleaning, route changes).
Noise Complaint During Transport Operations	• Cease or modify activity if safe and practical to do so. • Avoid unnecessary idling or engine revving. • Relocate vehicle if practicable.	• Investigate source of noise. • Inspect vehicle for mechanical issues. • Adjust scheduling or operating practices. • Record complaint and corrective actions.

5.0 Training, Testing and Communication

5.1 Training

All drivers will be trained on the contents, processes, and requirements of the Transport PIRMP. As a minimum, drivers will be made aware of the Transport PIRMP and trained to be competent to prevent, identify, and respond to pollution incidents in mobile environments.

Training will be delivered through one or more of the following ways: inductions, toolbox talks, formal training at Enviroking and training exercises.

The objectives of this training are to:

- Inform drivers of the Transport PIRMP.
- Ensure drivers understand their legal obligations under the POEO Act, including duty to notify (s148).
- Ensure personnel are capable of recognising a pollution incident and determining whether material harm is likely.
- Ensure drivers can initiate an immediate and effective response using available onboard equipment.
- Ensure personnel understand communication and notification protocols, including interaction with emergency services and the EPA.
- Ensure risks specific to transport activities (e.g. spill during transit, collision, unloading incidents) are effectively managed.

Refresher training will be provided within 30 days of the following:

- Pollution incident
- Transport PIRMP tests
- Transport PIRMP updates / revisions

5.2 Testing

The WHS Manager will coordinate Transport PIRMP testing with drivers to ensure accuracy, currency, and effective implementation. Routine testing will be conducted annually or within one month of any pollution incident and can be carried out through the following methods:

- Debriefing following incident response.
- Simulated environmental emergency.
- Desktop simulations working through an incident scenario.

When testing the Transport PIRMP, Enviroking should debrief with personnel who participated in the test. This involves asking the following questions:

- What worked?
- What would we do the same next time?
- What would we do differently next time?

- What needs did we identify? (e.g. staff training, safety procedures, additional equipment).

Records documenting the testing dates and the names of the staff members who conducted the testing will be maintained. The test register can be found in Table 12 below.

Table 12: Test Register

Dated Tested	Tested By	Details of Test / Review	Findings / Issues Identified	PIRMP updated (y/n)

5.3 Review

This Transport PIRMP must be regularly reviewed and maintained to ensure it remains current, accurate, and effective for managing pollution incidents during mobile operations.

Reviews must confirm that the plan is practical, implementable and aligned with current transport risks, fleet operations, and regulatory requirements. Reviews will be coordinated by the WHS Manager with the following objectives:

- The Transport PIRMP reflects current transport activities, including vehicle types and waste streams
- Identified hazards and controls remain accurate and relevant to transport operations
- Contact details, notification procedures, and responsibilities are kept up to date
- The Transport PIRMP can be effectively implemented by drivers and personnel during a transport incident
- Opportunities for improvement are identified and incorporated

PIRMP Reviews will be undertaken on event and time-based triggers.

Event Based

Events which may trigger a review of this Transport PIRMP, or its associated documents include:

- Activating the Transport PIRMP (within 30 days)
- Completing Transport PIRMP Testing (within 30 days)
- Change of operations including:
  - Introduction of new vehicles or equipment
  - Changes in waste types transported
  - Changes in loading, transport, or unloading procedures
  - Expansion or modification of transport routes
- Changes to relevant legislation or regulatory requirements

Time Based

The Transport PIRMP must be reviewed at least once every 12 months, regardless of whether incidents or changes have occurred.

Transport PIRMP Revisions

Where Transport PIRMP reviews identify required updates, they will be made within 30 days of completing the review. The version number and date of the Transport PIRMP is to be updated within the revision record and documented within the Test Register. Each review must consider:

- Effectiveness of incident response procedure
- Adequacy of driver training and competency
- Suitability and availability of vehicle-based spill response equipment
- Effectiveness of communication and notification processes, including interaction with EPA and emergency services
- Any feedback from:
  - Drivers
  - Incident investigations
  - Regulatory authorities

Updates to the Transport PIRMP must be communicated to all relevant personnel and made available to all drivers. Enviroking will apply a continuous improvement approach to transport incident management by:

- Incorporating lessons learned from incidents and near misses
- Updating procedures based on testing outcomes
- Improving controls, training, and equipment where gaps are identified

5.4 Availability of the PIRMP

A copy of this PIRMP will be kept in written and electronic form at Enviroking and will be made readily available onsite at all times to personnel responsible for implementing the PIRMP and to any authorised officer (as defined in the POEO Act), upon request. To ensure access during power or internet outages, hard copies are maintained at the Office reception and the Plant Shed control desk.

The PIRMP will be made publicly available within 14 days after it is prepared or updated by placing the public version on Enviroking's publicly accessible website. If the website is unavailable, a copy will be provided without charge to any person who makes a written request. The public version includes procedures for contacting relevant authorities and for communicating with neighbours and the community but excludes personal information such as private contact details, in accordance with privacy obligations.

6.0 References

NSW EPA, Environment Protection Licence (EPL 11180), 2013

NSW Protection of the Environment Operations Act 1997 (POEO Act)

NSW Department of Planning, Project Approval 07_0048, 2010

NSW Environmental Planning and Assessment Act 1979 (EP&A Act)

Sampling Procedures, SLR Consulting, 2024

Appendix A: Environment Protection Licence – 11180

Environment Protection Licence

Licence Details	
Number:	11180
Anniversary Date:	23-October

Licensee
ENVIROKING PTY LTD
843 JOHN RENSHAW DRIVE
BLACK HILL NSW 2322

Premises
SLUDGE KING
843 JOHN RENSHAW DRIVE
BLACK HILL NSW 2322

Scheduled Activity
Waste Processing (non-thermal treatment)
Waste Storage

Fee Based Activity	**Scale**
Non-thermal treatment of hazardous and other waste	> 0 T treated
Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	> 0 T stored

Region
Waste & Resources - Waste Management
59-61 Goulburn Street
SYDNEY NSW 2000
Phone: (02) 9995 5000
Fax: (02) 9995 5999
PO Box A290 SYDNEY SOUTH
NSW 1232

Environment Protection Licence

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act); and
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

The EPA publication "A Guide to Licensing" contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

ENVIROKING PTY LTD
843 JOHN RENSHAW DRIVE
BLACK HILL NSW 2322

subject to the conditions which follow.

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Waste Processing (non-thermal treatment)	Non-thermal treatment of hazardous and other waste	> 0 T treated
Waste Storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	> 0 T stored

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
SLUDGE KING
843 JOHN RENSHAW DRIVE
BLACK HILL
NSW 2322
PART LOT 931 DP 816814
THAT PART OF LOT 931 DP 816814 OUTLINED IN RED ON THE PLAN TITLED "PLAN SHOWING PROPOSED BUSINESS AREA ON PART OF LOT 931 DP 816814" PREPARED BY DAVID CANT SURVEYORS AND DATED 1 FEBRUARY 2013, WHICH WAS RECEIVED BY THE EPA ON 3 APRIL 2013.

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

2 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Waste

L2.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
K110	Grease trap waste	As defined in Schedule 1 of the POEO Act, as in force from time to time.	Waste storage Waste processing (non-thermal treatment)	Refer to Condition L2.2
J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste storage Waste processing (non-thermal treatment)	Refer to Condition L2.2
NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	As specified in each particular resource recovery exemption	Refer to Condition L2.2
NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA

L2.2 The Licensee must not process more than 20,000 tonnes per year in total of waste.

L3 Potentially offensive odour

L3.1 No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.

Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.

3 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

O3 Emergency response

O3.1 The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.

O4 Processes and management

O4.1 The licensee must ensure that any liquid and/or non liquid waste for processing, storage, resource recovery or disposal at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.

O4.2 The licensee must ensure that waste identified for recycling is stored separately from other waste.

O4.3 In accordance with consent condition 7 of Project Approval 07_0048, all waste water is to be stored in the approved storage areas and there is to be no irrigation of wastewater at the Premises.

O5 Waste management

O5.1 All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.

O5.2 The licensee must ensure that suitable measures (eg. high/low alarms, control valves with interlock control, one way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of material that could cause harm to the environment.

4 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Recording of pollution complaints

M2.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M2.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M2.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M2.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M3 Telephone complaints line

M3.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M3.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M3.3 The preceding two conditions do not apply until 3 months after:
a) the date of the issue of this licence or
b) if this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation.

5 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:
a) a Statement of Compliance; and
b) a Monitoring and Complaints Summary.
At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R1.8 A person who has been given written approval to certify a certificate of compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review of this licence.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after

making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

6 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.*
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.*
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder describe d at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same me aning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non - putrescible), special waste or hazardous waste

Mr Mitchell Bennett

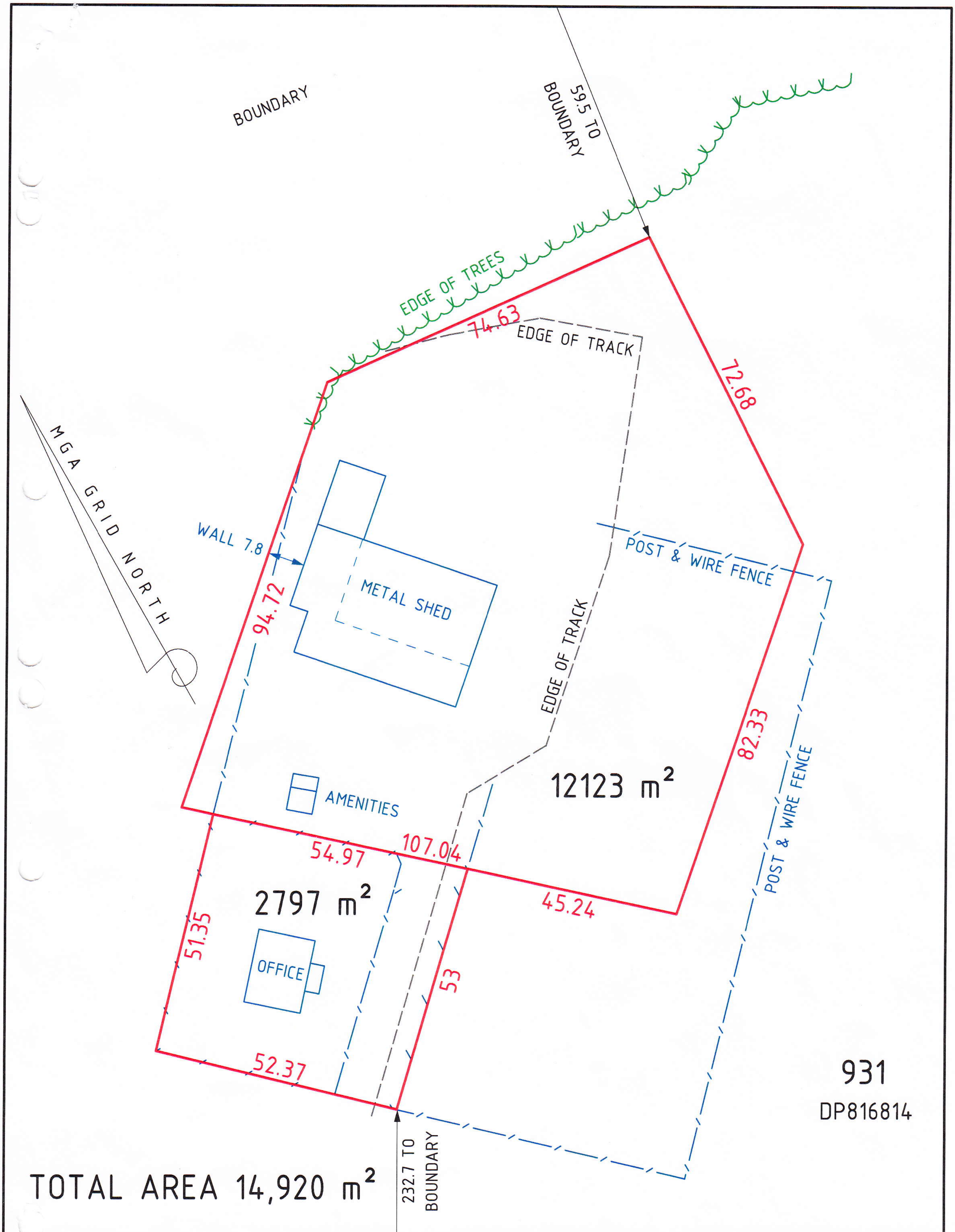
Environment Protection Authority

(By Delegation)

Date of this edition: 23-October-2000

End Notes

1	Licence transferred through application 140581, approved on 05-Jul-2001, which came into effect on 23-Oct-2000.
2	Licence varied by notice 1013115, issued on 29-Nov-2001, which came into effect on 24-Dec-2001.
3	Licence varied by notice 1037428, issued on 28-May-2004, which came into effect on 22-Jun-2004.
4	Licence varied by notice 1044777, issued on 22-Feb-2005, which came into effect on 19-Mar-2005.
5	Licence varied by notice 1051243, issued on 08-Nov-2005, which came into effect on 03-Dec-2005.
6	Licence varied by notice 1057339, issued on 01-May-2006, which came into effect on 01-May-2006.
7	Licence varied by notice 1068428, issued on 16-Apr-2007, which came into effect on 16-Apr-2007.
8	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
9	Licence varied by notice 1093977, issued on 21-Nov-2008, which came into effect on 21-Nov-2008.
10	Licence varied by Correction to EPA Region data record., issued on 28-Jun-2010, which came into effect on 28-Jun-2010.
11	Licence varied by notice 1503914 issued on 01-Mar-2012



TOTAL AREA 14,920 m²

David Cant
SURVEYORS
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Ph (02) 4934 5011 Fax (02) 4934 5022

PLAN SHOWING PROPOSED BUSINESS AREA ON PART OF LOT 931 DP816814
843 JOHN RENSHAW DRIVE, BLACK HILL
Client Enviroking

Ref.04-143d Black Hill	
Date	1/02/2013
Scale	1:1000 (A4)
Revision	1

Appendix B: Environmental Incident Report Form

Environmental Incident Report

This report is to be completed for all environmental incidents associated with Enviroking.

INCIDENT SUMMARY	
Date of Incident:	**Time of Incident:**
Duration of Incident:	
Location of the Incident:	
Description of Incident:	
Incident Reported by:	

INCIDENT SUMMARY	
Responsible Supervisor:	
Immediate Actions:	

INCIDENT INVESTIGATION	
Further Actions Required (mitigation measures, preventative measures)	
Has this incident had an impact to the community?	

INCIDENT NOTIFICATION	
Was the EPA required to be notified? If so details?	
Were Staff and Contractors Notified?	

INCIDENT REPORT SIGN OFF
Person Reporting the Incident: Name (print): Date: Signature: Time:
Supervisor: Name (print): Date: Signature: Time:

Making Sustainability Happen