



Pollution Incident Response Management Plan

EPL 21972
Moorebank Ave Realignment

Contents

1. Purpose.....	4
1.1 Definition of a pollution incident and Material Harm.....	4
2. EPL Details	5
3. Pollution incident – person/s responsible.....	6
4. Notification of relevant authorities	7
5. Notification of neighbours and the local community.....	7
6. Description and likelihood of hazards	7
7. Pre-emptive actions to be taken	11
8. Inventory of pollutants	11
9. Safety equipment	12
10. Minimising harm to persons on the premises	13
12. Actions to be taken during or immediately after a pollution incident.....	15
13. Staff training	16
14. Testing and updating of the PIRMP	16

Job Name: Moorebank Avenue Realignment Works

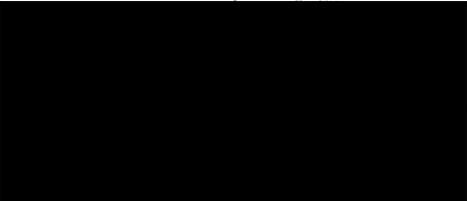
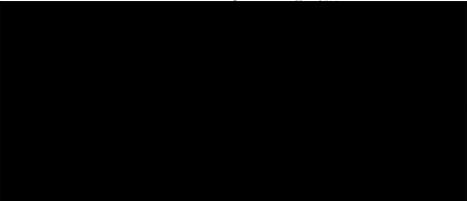
Job No: 121-2118

Approved By 

Signature

Document Version Control

Table 1: Version history

Version No.	Date	Details Document History / Change Trigger	Approved By	Signature
1.0	19/03/2025	Conception of PIRMP		
2.0	19/12/2025	Review post events		

1. Purpose

B.M.D. CONSTRUCTIONS PTY LIMITED holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Moorebank Avenue Realignment Works. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

Note: This plan must be developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2022.

1.1 Definition of a pollution incident and Material Harm.

The POEO Act defines a 'pollution incident' as being:

'Pollution incident means an incident or a set of circumstances during or as a consequence of which there is or likely is 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 noise.'

Notifications of a pollution incident are required if there is a risk of 'material harm to the environment', which is defined in Section 147 of the POEO Act as:

1. Harm to the environment is material if:
 - a. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - b. It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
 - a. Loss includes reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

The POEO Act defines 'pollution' in the following terms:

'Pollution' means:

- I. Water pollution: or
- II. Air pollution, or
- III. Noise pollution, or
- IV. Land pollution

An initial determination of material harm will be made by the onsite BMD Environmental Advisor. If the onsite Environmental Advisor is not immediately available, then determination of environmental harm can be made by the BMD Regional Environment Manager.

2. EPL Details

Table 2: EPL details

Environment Protection Licence (EPL) details	
Name of licensee:	B.M.D. CONSTRUCTIONS PTY. LIMITED 59 010 126 100
EPL number:	21972
Premises name and address:	MOOREBANK AVENUE REALIGNMENT WORKS, 400 MOOREBANK AVENUE, MOOREBANK, NSW, 2170
Company or business contact details	Name: [REDACTED] Position or title: Project Manager Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Website address:	www.bmd.global
Scheduled activity/activities on EPL:	Road Construction
Fee-based activity/activities on EPL:	Road Construction (>= 50,000T & road to be constructed <10km)

3. Pollution incident – person/s responsible

Table 3: Responsible persons

Responsible Persons	
PIRMP activation	Name of person responsible: [REDACTED] Position or title: Environmental Coordinator Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name of person responsible: [REDACTED] Position or title: Environmental Coordinator Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Managing response to pollution incident	Name of person responsible: [REDACTED] Position or title: Environmental Coordinator Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]

Table 4: Alternative persons

Responsible Persons (alternate)	
PIRMP activation	Name of person responsible: [REDACTED] [REDACTED] Position or title: Environment Manager Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name of person responsible: [REDACTED] [REDACTED] Position or title: Environment Manager Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Managing response to pollution incident	Name of person responsible: [REDACTED] Position or title: Project Manager Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]

4. Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Table 5: Relevant authorities

Authority	Contact number/s:
Fire and Rescue NSW - Liverpool	(02) 9824 0521 (000 for emergencies)
EPA	13 15 55
SafeWork NSW	13 10 50
Local authority/s Liverpool City Council	1300 362 170
Department of Planning & Environment Secretary	Email: Major Projects Portal Phone: (02)995 6038
Department of Climate Change, Energy, the Environment and Water Minister	DCCEEW: ewater@dcceew.gov.au

5. Notification of neighbours and the local community

Notification of DJLU East and the affected community will be completed via phone call and door knocking where phone numbers are not available. The area notified is dependent on the extent of an incident/spill and the effected community members.

Table 6: Affected stakeholders

Stakeholder	Contact number/s:
Department of Defence - DJLU East	██████████
Wattle Grove Residents backing onto Anzac Creek	N/A

6. Description and likelihood of hazards

- Bushfire
- Spillage of contaminants into waterways (chemical, fuel, hazardous liquids)
- Spillage from machinery or vehicles.
- Mobilisation of potentially contaminated soil/material (including but not limited to: Asbestos, PFAS, hydrocarbon compounds).

Table 7: Hazard analysis (Cause, Impact, Controls and Actions)

Hazard		Fire	
Storage area		N/A	
Cause		<ul style="list-style-type: none"> Drought conditions Surrounding bushland producing high fuel load Lighting Strike Onsite fire 	
Impact		<ul style="list-style-type: none"> Damage to site facilities leading to potential release of materials causing water and/or land pollution. Loss of biodiversity. Inability to safely access/exit site. Smoke causing adverse impact to human health. 	
• Likelihood	Low	Material Harm	High
Controls		<ul style="list-style-type: none"> Emergency response/evacuation procedures Fire extinguishing equipment located in all plant, vehicles and crib sheds. Water cart onsite. MARW Construction Bushfire Management Plan 	
Actions		<ul style="list-style-type: none"> Contact Fire and Rescue NSW - 000 Actions to be taken dependent on the impact of fire. Activate BMD Emergency Response Procedure. Activate PIRMP if there is actual or material environmental harm. 	
Hazard		Bulk Diesel Spill	
Storage area		Refuelling Truck, 8000L mobile tanker	
Cause		<ul style="list-style-type: none"> Tank integrity failure. 	

		<ul style="list-style-type: none"> • Diesel transfer incident • Collision/impact with mobile plant 	
Impact		<ul style="list-style-type: none"> • Contamination to surrounding waterways/land 	
Likelihood	Low	Material Harm	High
Controls		<ul style="list-style-type: none"> • Refuel plant in designated locations only. • Routine inspection of refuelling tanker and refuelling equipment. • Plan and implement works to minimise the possibility of pollution. • Spill response kit readily available. 	
Actions		<ul style="list-style-type: none"> • Contain/control the source of spill. • Minimise spread into waterways wherever possible. Utilise temporary booms, weirs and diversions if necessary. • Remove/treat any contaminated material/water. • Activate PIRMP if there is actual or potential material environmental harm. 	
Hazard		Spills (Chemicals, Polymers, flocculants and hydrocarbons)	
Storage area		Main compound, mobile plant and vehicles.	
Cause		<ul style="list-style-type: none"> • Chemical/oil handling incident. • Chemical, Polymer or Flocculant storage areas impacted by plant/vehicles. • Failure of storage vessel. 	
Impact		<ul style="list-style-type: none"> • Contamination of water/land onsite with potential to migrate offsite. 	
Likelihood	Low	Material Harm	Moderate
Controls		<ul style="list-style-type: none"> • All chemicals, polymers, flocculants and hydrocarbons are stored in bunded containers or on portable bunded pallets. • Spill response materials readily available. 	

		<ul style="list-style-type: none"> • Routine inspections of storage areas and vessels. 		
Actions		<ul style="list-style-type: none"> • Isolate and contain any spills. • Organise for removal of contaminated water/land. • Activate PIRMP if there is actual or potential environmental harm. 		
Hazard	Discharge of non-compliant water			
Storage area	<p>Known low level heavy metal contamination in the site soils</p> <p>Known low level PFAS in the site soils</p> <p>Turbid water from construction activities</p>			
Cause	<ul style="list-style-type: none"> • Extreme weather overwhelming pump/diversion during culvert construction. • Sediment basin or sediment control failure. • PFAS treatment plant failure. 			
Impact	<ul style="list-style-type: none"> • Discharge of contaminated water/sediment offsite via Anzac Creek. • Potential adverse effects to human health or the environment. 			
Likelihood	Low	<table border="1"> <tr> <td>Material Harm</td> <td>Moderate</td> </tr> </table>	Material Harm	Moderate
Material Harm	Moderate			
Controls	<ul style="list-style-type: none"> • Specific WMS for working in and around Anzac Creek. • Create temporary diversion around construction area to facilitate the flow of Anzac Creek around excavations. • Store all excavated material >50m away from creek. • Regular inspections of works and areas around Anzac Creek. • Environmental testing off detained onsite water prior to pumping to environment. <p>Regular erosion and sediment control inspections</p>			

Actions	<ul style="list-style-type: none"> • Isolate and contain any material within excavation if possible. • Organise tanker/bogie to remove contaminated material to a licensed facility (if required). • If flooding related, refer to the BMD Flood Emergency Response located in the MARW Construction Soil and Water Management Plan. • Activate PIRMP if there is an actual or potential material harm
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7. Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

- Inspections
 - Daily Plant Pre-start Inspections
 - Weekly Environment Inspections
- Training
 - Includes PIRMP testing and MARW Induction Material.
- Hazardous Chemical Registers
 - Regular maintenance of SDS registers.
- Material Storage
 - Store all Hazardous Materials in accordance with Storage Requirements & Segregation.
 - Consult SDS for storage instructions and requirements.

8. Inventory of pollutants

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

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Table 8: Inventory of pollutants

Location/tank	Max. quantity	Contents	Comments
Main Compound	8000L (Diluted) 2000L (concentrate)	Polymer Binding Spray	This product is stored in main compound in concentrate (max 2000L capacity). The product is diluted 10:1 for application to land (max 8000L capacity)
Main Compound	2000L	Gypsum/Aluminium Based Flocculants	This product is stored in main compound (Concentrate max 2000L). The product is diluted 10:1 for application to waters (Max 2000L capacity in tank).
Main Compound	200L	Petroleum	Stored in 20L jerry cans inside bunded fuel container. Maximum 5L jerry can will be used when re-fuelling small engines/pumps to minimise spills.
Main Compound	1000L	Oils and Lubricants	Stored in adequate storage vessel in bunded fuel container.
Portable Diesel Re-fuelling Tanker	8000L	Diesel	Diesel re-fuelling is provided by sub-contractor. Re-fuelling of plant is to occur in approved locations only.
Site wide	Unknown	Contaminate impacted soils (Copper, Zinc, Benzopyrene, PFAS & Asbestos)	See BMD WMS007 - Working in a Waterway for details & controls. Progressive Erosion and Sediment Control Plan

9. Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

- Chemical Safety Data Sheets.
- Spill Kits
- Pumps
- PPE

10. Minimising harm to persons on the premises

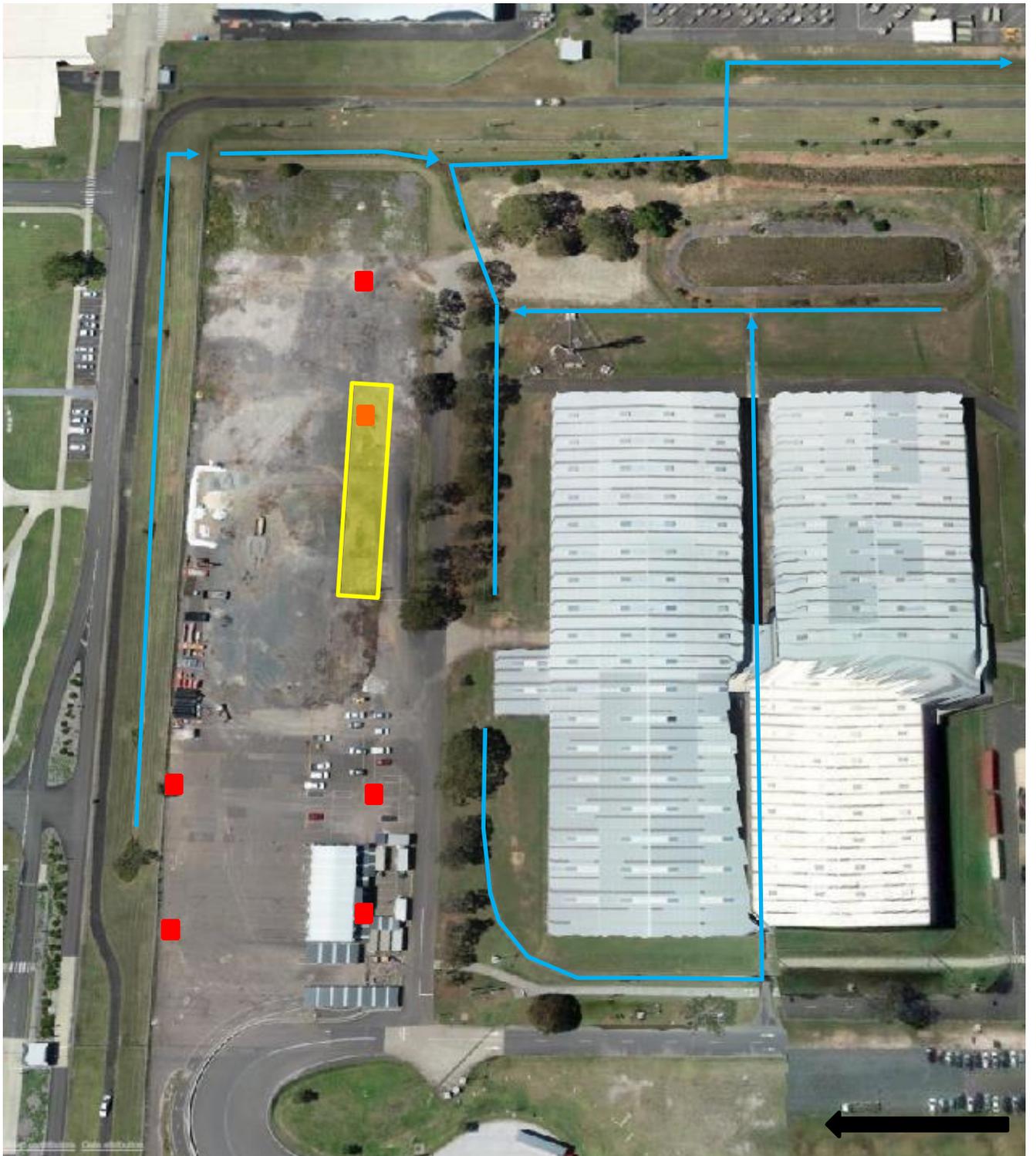
Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- Relevant PPE for persons utilising hazardous substances/conducting clean up (Consult SDS for required PPE).
- Read and sign onto relevant WMS before undertaking work with a hazardous material or clean up response.

11. Premise Map



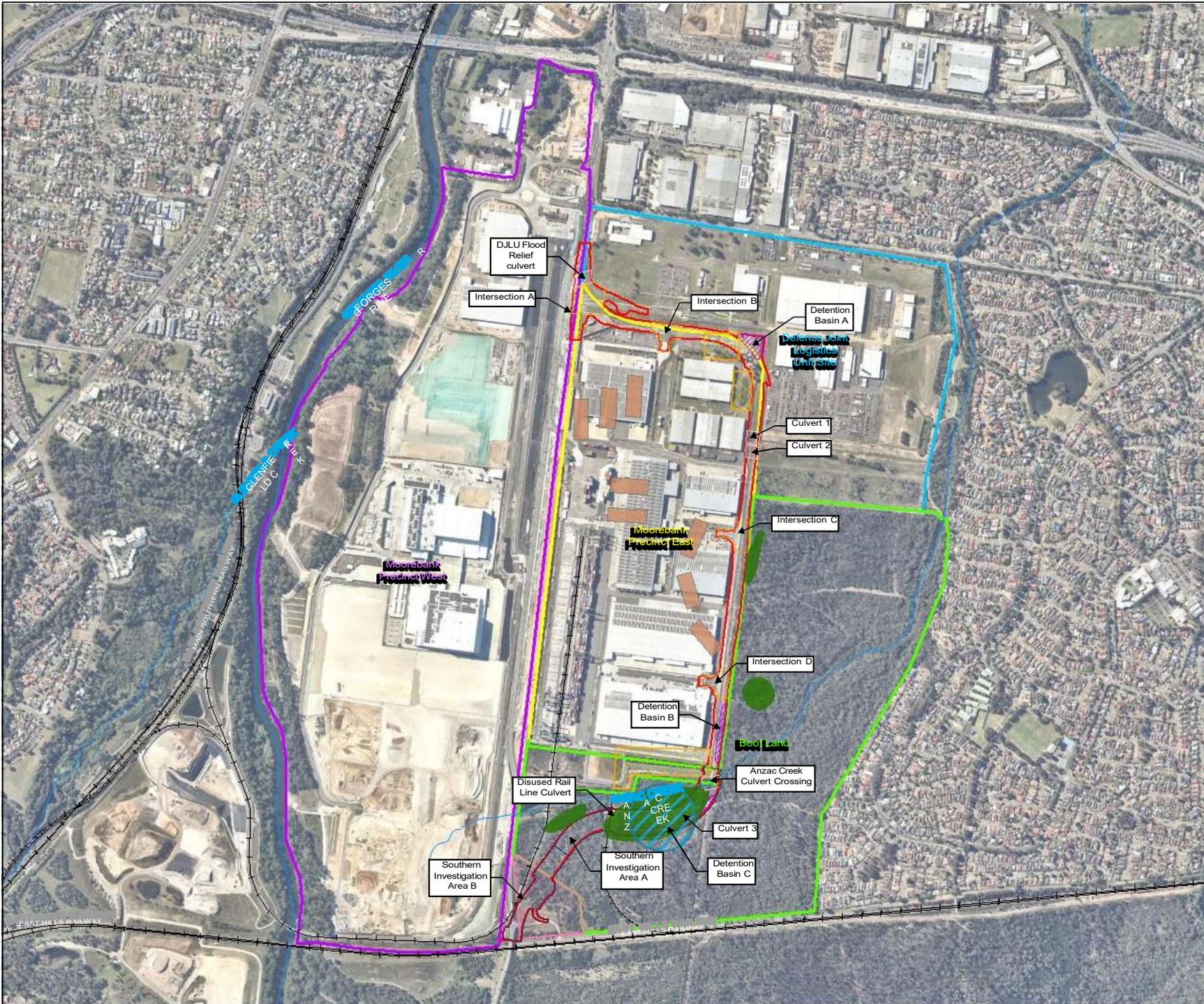
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 Figure 1: EPL Premise Map



Legend			
	Watercourse		North arrow
	Hazardous Materials storage area		Stormwater pit

Figure 2: Compound Drainage pits and Chemical Storage

Figure 2
Targeted Investigation Areas during the TSCI



- Legend**
- Watercourse
 - Railway
 - Approximate Site Boundary
 - Culvert
 - Detention Basin
 - Intersections
 - Investigation Areas
 - Sydney Trains Land
 - Boot Land Boundary
 - Defence Joint Logistics Unit Site
 - Moorebank Precinct East
 - Moorebank Precinct West
 - Approximate Location of Former Grenade Range (JBS&G, 2016)
 - Approximate Location of Former Burial and Burn Pits (JBS&G, 2016)
 - Approximate Location of Former Vehicle and Equipment Storage (JBS&G, 2016)
 - Approximate Location of Stockpiles (EMM, 2020; AECOM, 2016)



Coordinate system: GDA 1994 MGA Zone 56

Scale ratio correct when printed at A3
1:12,000 Date: 10/04/2024



Data sources: DELWP, Geoscience Australia

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12. Actions to be taken during or immediately after a pollution incident

The actions to be taken immediately following a pollution incident are shown below in Figure 3.

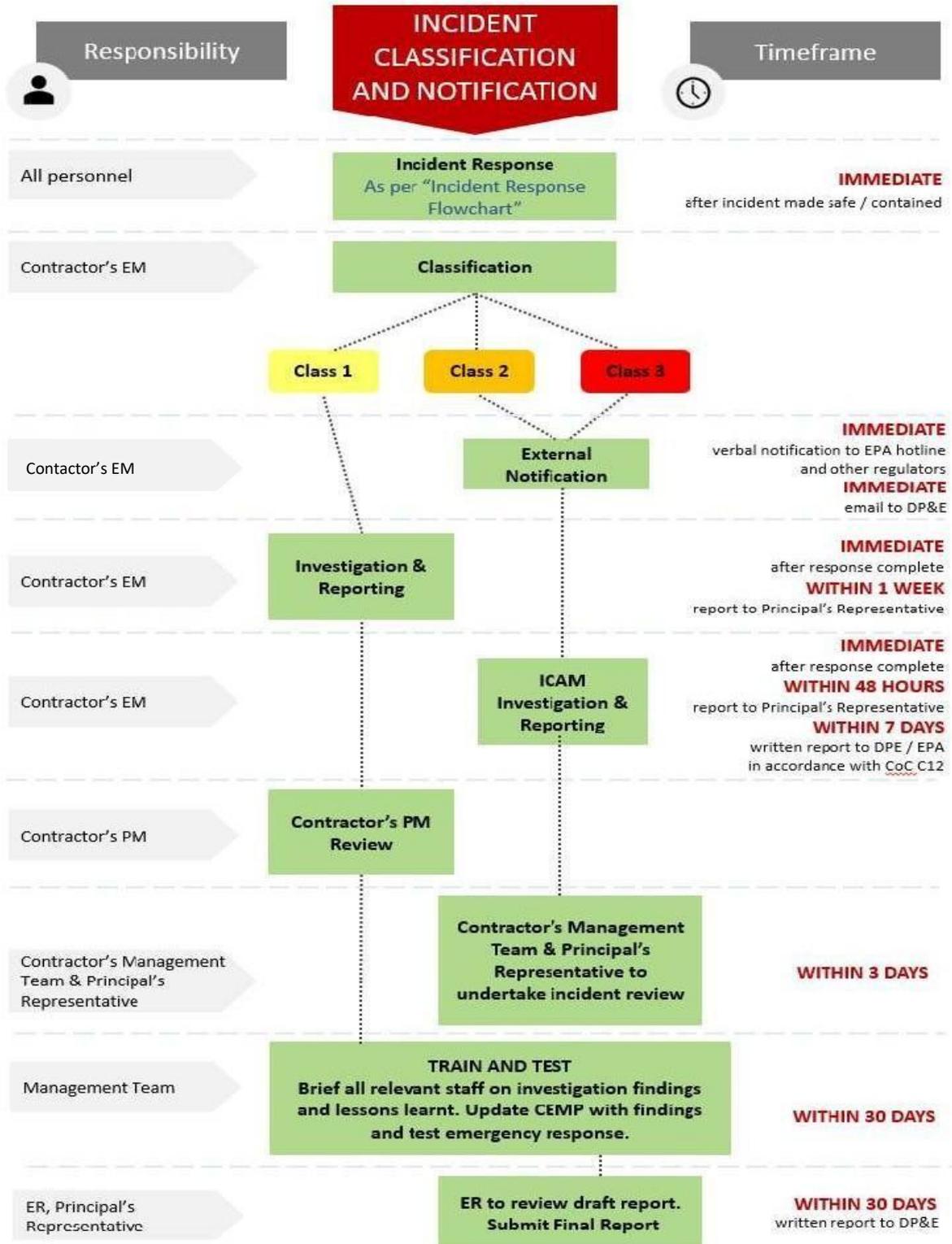


Figure 3: Incident response flowchart

13. Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

- Annual testing of the PIRMP, which includes involving key staff as a training exercise.
- All employees and sub-contractors are informed of the PIRMP during the MARW induction process.

14. Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

Table 9: PIRMP testing details

Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
18/12/2025	[REDACTED]	Review of response to two recent events.	PIRMP to be updated to reflect progress of construction. Contact names updated to better reflect team structure.	Prior to 18/12/2025 or following significant incident

Table 10: PIRMP updates

Date update occurred	Reason for update	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website	Date of completion
19/12/2025	Post Water discharge	Updated contaminated sediments in Anzac Creek to non-compliant water to cover more pollutants and reflect sediment remediation. Removed NSW Health as per change to S5.7 of POEO Act Updated contacts in Section 3 Updated Figure 1 and 2	22/12/2025	22/12/2025

