

# Pollution Incident Response Management Plan

**AUGUST** 

2024

This is the Supporting Statement for the Pollution Incident Response Management Plan (PIRMP). The PIRMP is a functional document. It is designed to assist personnel at Councils Gravel Quarries to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident.

Houghtons Quarry

EPL 12713

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## **Foreword**

This is the Supporting Statement for the Pollution Incident Response Management Plan (PIRMP). The PIRMP is a functional document. It is designed to assist personnel at Councils Gravel Quarries to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident.

The structure and scope of this Supporting Statement and PIRMP reflects the requirements of the Environmental Protection Authority's *Guidelines: Preparation of pollution incident response management plans, September 2023* and in doing so embodies the principles of best practice environmental management.

Utilisation of this PIRMP aims to improve, monitor and demonstrate environmental performance. If you have any suggestions for amendments, additions or improvements, please discuss these with your supervisor.

Manager – Cowra Works Cowra Shire Council

## Introduction

#### I.I PURPOSE

This Supporting Statement and PIRMP have been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflect the requirements specified in the Environment Protection Authority's (EPA's) *Guidelines: Preparation of pollution incident response management plans, September 2023.* 

The PIRMP details:

Procedures for notifying a pollution incident to relevant persons;

Actions to be taken to reduce and/or control pollution; and

Procedures for coordinating those notified and any action taken in combating the pollution.

#### 1.2 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

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
  - 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
- (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."

#### 1.3 IDENTIFIED POLLUTION INCIDENT RISKS

The primary potential hazards to human health or the environment associated with the activity undertaken at this site – i.e. 'Pollution Incidents' - include the following:

Any incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions. Identification of any failure of an environmental protection system;

- Acts of vandalism or target of terrorist activity; or
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

### **Site Overview**

#### 2.1 SITE OVERVIEW

Houghtons Quarry is owned by Cowra Shire Council. It is estimated that the site has at least 100-year lifespan.

Houghtons Quarry currently operates under the Council of the Shire of Cowra approval, issued 25 October 2011.

#### 2.2 SITE CHARACTERISTICS

Houghtons Quarry is located approximately 13.5km South of Cowra on Lachlan Valley Way. It comprises Lot I DP 1099236 – approx 19.08 Hectares.

Coordinates 148.692764 Longitude

-34.023000 Latitude

The area surrounding the facility to the north, south, east and west is predominantly rural pasture land.

The nearest residential property to the facility is located approximately 800m South of the quarry.

Access to Houghtons Quarry is via Lachlan Valley Way. Lachlan Valley Way is a two-lane sealed road. From Lachlan Valley Way the quarry is accessible via a primary sealed road to the quarry floor. Within the quarry, access to the crushed gravel is via the current floor. More recently a storm water storage area has been formed on the South-Western side of the quarry floor.

Houghtons quarry is fenced along all boundaries with a standard rural fence with a locked gate at the entrance. All visitors are required to be inducted and must sign the attendance register located in the microwave adjacent to the amenity building.

The storage will then be monitored for TSS and pH and a record kept. The aim being to discharge regularly, once all parameters are proven within limits, to maintain capacity for larger storm events.

The quarry floor has been engineered to direct runoff to the South-Western side. A runoff interception dam of 5000m3 has been constructed to intercept and allow treatment of runoff prior to discharge offsite. The neighbour to the West has a corridor of trees that benefits from the final discharge.

There is limited remnant natural vegetation over the site. Longer term plans are in place to improve overall amenities provided in Council's Landscape Plan.

#### 2.3 SITE SUPERVISION AND CONTROL

Houghtons Quarry is only open for business between 7am and 4pm weekdays and as required on Saturdays. The quarry is closed on Sundays, Good Friday and Christmas Day. Access to the site outside these hours is not permitted.

Houghtons Quarry is visited by Councils production Manager weekly during hours of operation to ensure compliance and safety requirements are met.

The front gate is locked when the quarry is not in use, and when crushing contractors are onsite producing gravel.

Entry is by mutual invitation and all new visitors are inducted.

Entry to and exit from the quarry are recorded in the visitors book. Lone workers must report to Council twice daily as outlined in the SWMS for same.

#### 2.4 SITE SAFETY EQUIPMENT

Houghtons Quarry and working area is devoid of any combustible material.

All work vehicles are filled from a mobile tanker and other consumables are bought in as necessary on same vehicle for regular servicing.

To manage leaks, Spill Sorb (spill kit) is onsite. Where Spill Sorb is used, the used material is collected and then deposited in Council's landfill. In the event of a chemical spill, PPE is provided for onsite staff which consists of safety goggles, respirator face masks and protective gloves.

## **Risk Management and Pre-emptive Actions**

#### 3.1 INTRODUCTION

The following section outlines current operational procedures and design intended to minimise and manage risk. Members of staff working on site are responsible for being aware and notifying the Production Manager of any potential pollution incidents on the premises. All management procedures detailed within the Local Environmental Management Plan (LEMP) must be adhered to.

#### 3.2 PRE-EMPTIVE ACTIONS

#### 3.2.1 Surface fires

The potential for fires to occur at the site are controlled by:

- A fence to prevent unauthorised access and acts of vandalism;
- Maintaining machinery in good working order to minimise risk of sparks; Smothering immediately with soil:
- Ensuring fire breaks are maintained; and
- Access to on-site firefighting equipment (mobile tanker when available);

#### 3.3 POTENTIAL POLLUTION INCIDENTS

The potential main hazards to human health or the environment – i.e. 'Pollution Incidents' - associated with the activity undertaken at this site include the following:

- Surface fires;
- Mixing of quarry products and storm water;
- Identification of any failure of an environmental protection system; Acts of vandalism; or
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.
- Use of oilgone on oil spills- Litre for Litre

# 3.4 LIKELIHOOD, IMPACT AND CONTRIBUTING FACTORS TO POLLUTION INCIDENTS OCCURRING

Incidents can be classified as being of low, medium or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout.

The impact of an incident can be classed as low, medium or high based on the potential extent of off- site harm to humans and/or the environment.

Appendix B includes Council's Mine Safety Management System Risk assessments

#### 3.4.1 Surface fires

**Medium Likelihood** – The likelihood of a fire within the area is relatively high, due to the surrounding rural area.

**Medium Impact** – It is probable that a fire of this nature should be able to be contained due to the procedures and equipment in place. Therefore, the impact is classed as medium.

**Contributing Factors** – Factors which may increase fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity. Human errors made during operation at the quarry and the poor maintenance of plant and equipment may spark a fire.

# 3.4.2 Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions

Low Likelihood – The site has significant environmental protection measures and inspection schedule.

**Low Impact** – The site has significant environmental protection measures and inspection schedule which are likely to contain and prevent the immediate spread of environmental hazards outside the premises even outside of normal operating conditions.

Contributing Factors – e.g.;

- Overturned vehicle / fuel spill
- Hose failure
- Tank failure
- Human error
- Illegal dumping

**PIRMP** 

#### 4.1 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

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
  - 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
- (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."

#### 4.2 NOTIFICATION OF POLLUTION INCIDENT

#### 4.2.1 Notification speed of response

The requirement for notification of a pollution incident has changed from 'as soon as practicable' to 'immediately'. In short, 'immediately' means 'promptly without delay', but it does not mean undertaking notification ahead of doing what is necessary to make safe.

#### 4.2.2 Notification of relevant authorities

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Site Supervisor:

#### I. Emergency Call Services

Emergency Hotline Number (24 hours)

\*000

#### 2. Cowra Shire Council

6340 2070

Manager Cowra Works (Jonathan Chinomona)

0427 083 843

• Production Manager (Kris Beaumont)

0427 277 049

#### 3. The Environment Protection Authority (EPA)

131 555

#### 4. SafeWork NSW

Hotline Number

13 10 50

#### 5. Fire and Rescue NSW

• Cowra Rural Fire Service

02 63411624\*\*

A summary of the above pollution incident notification procedure is provided in **Document A** – Pollution Incident Decision Flow Chart in **Appendix A** 

<sup>\*</sup> The Production Manager/operator present in quarry at the time should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number.

<sup>\*\*</sup> If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the site supervisor is still required to follow that outlined above except for dialing 000.

#### 4.2.3 Information to be notified

Under section 150 of the POEO Act 1997, the information about a pollution incident that must be notified is:

The time, date, nature, duration and location of the incident;

The location of the place where pollution is occurring or is likely to occur;

The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;

The circumstances in which the incident occurred, including the cause of the incident, if known;

The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and

Other information prescribed by the regulations.

Notification is required by the Site Supervisor immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

A Pollution Incident Reporting Form is produced in **Appendix A** to assist the Production Manager in correctly recording and notifying the relevant authorities as detailed in **Section 4.2.2** above.

# 4.3 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

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

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher, or smothering with cover material.

In the event of a fuel spill that is not contained by bunding, Spill Sorb (or similar) must be used to restrict the spread of the chemical.

#### 4.4 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified.

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours.

Council would notify neighbours by 'door knocking' every neighbouring property. A summary of the neighbour notification procedure is provided in Document A – Pollution Incident Decision Flow Chart in **Appendix A**.

#### 4.5 IDENTIFICATION OF NEIGHBOURS

To assist the EPA in its decision as to whether it needs to direct Council to notify neighbours and to assist Council in visiting all the local neighbours, enclosed is locality plan which identifies the commercial, industrial and residential properties within 500m of the site boundary.

## **Implementation**

#### 5.1 STAFF TRAINING

New members of staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

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

- Staff must be capable of using the fire-fighting equipment;
- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.
- Staff competency will be monitored through audits, public complaints and pollution incident reports.

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to fimiliarise site personnel with the requirements of this management plan. Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

#### 5.2 REVIEW AND UPDATE PIRMP

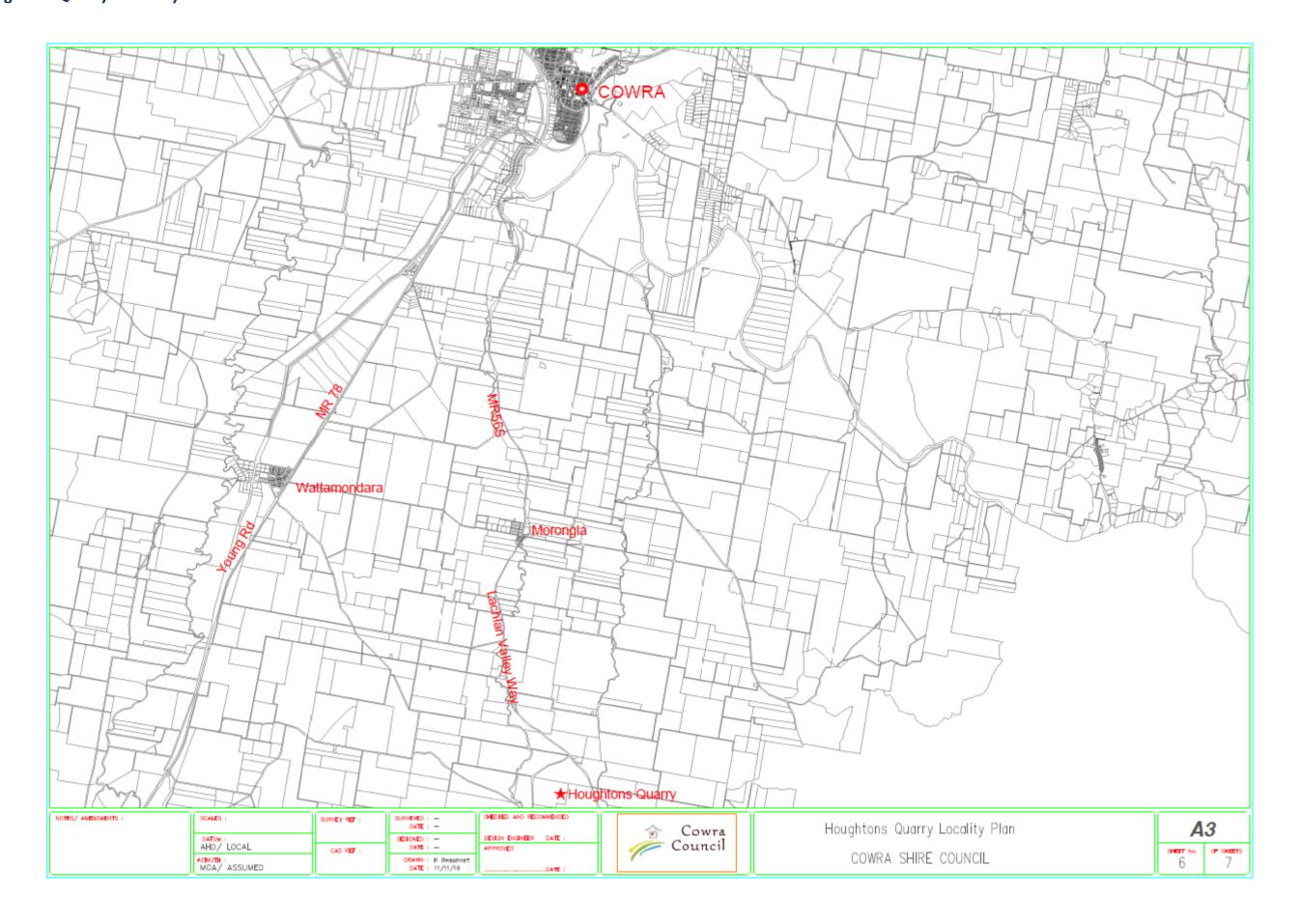
The PIRMP is a living document required to be reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version is replaced in its entirety. A register for updating and testing the PIRMP can be found in **Appendix A** and must be kept on site and updated regularly.

# **Drawings**

- I. Houghtons Quarry Locality Plan
- 2. Houghtons Quarry Emergency Evacuation and Aerial Plan
- 3. Houghtons Quarry Neighbour Details

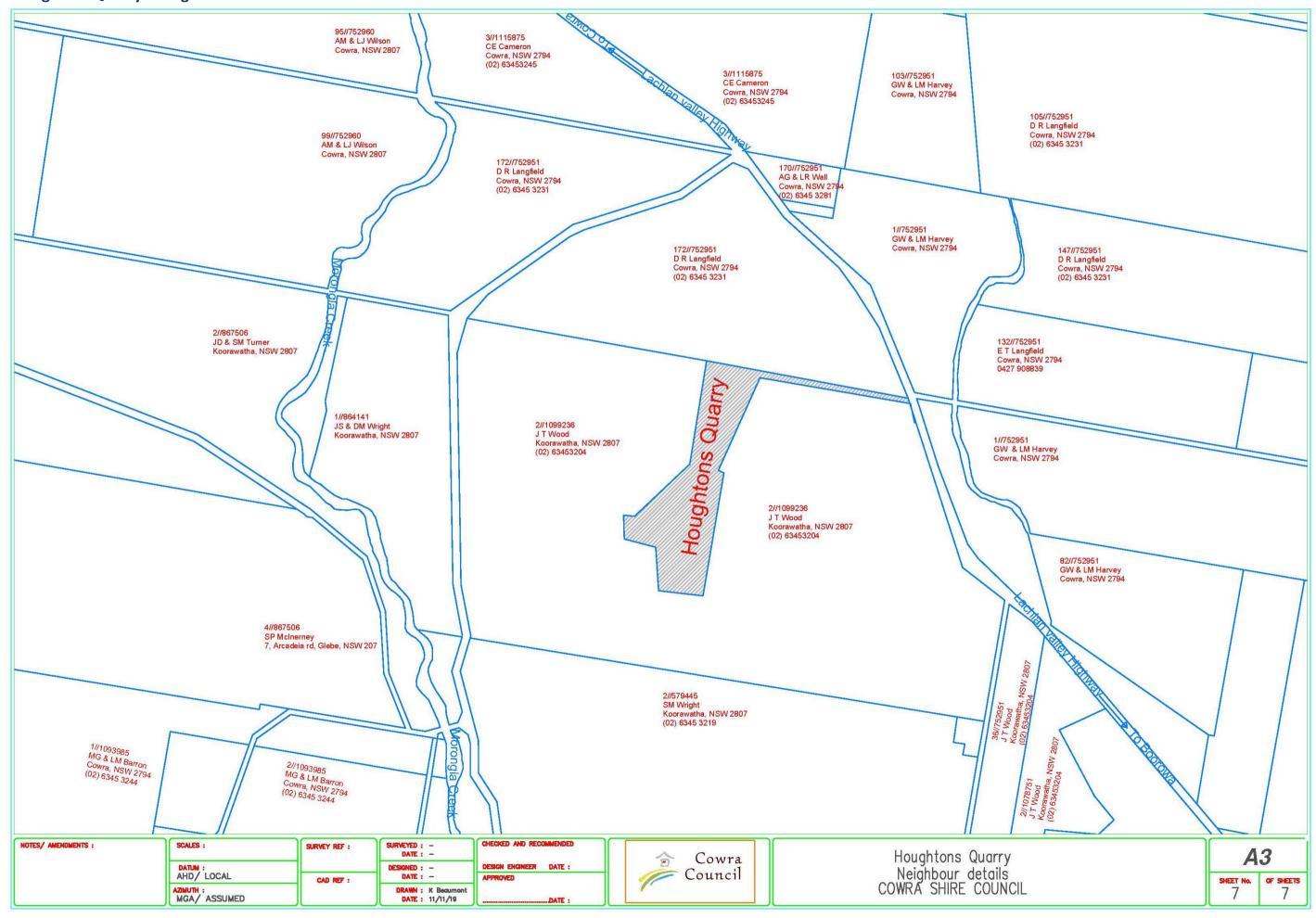


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#### **Houghtons Quarry - Neighbour Details**



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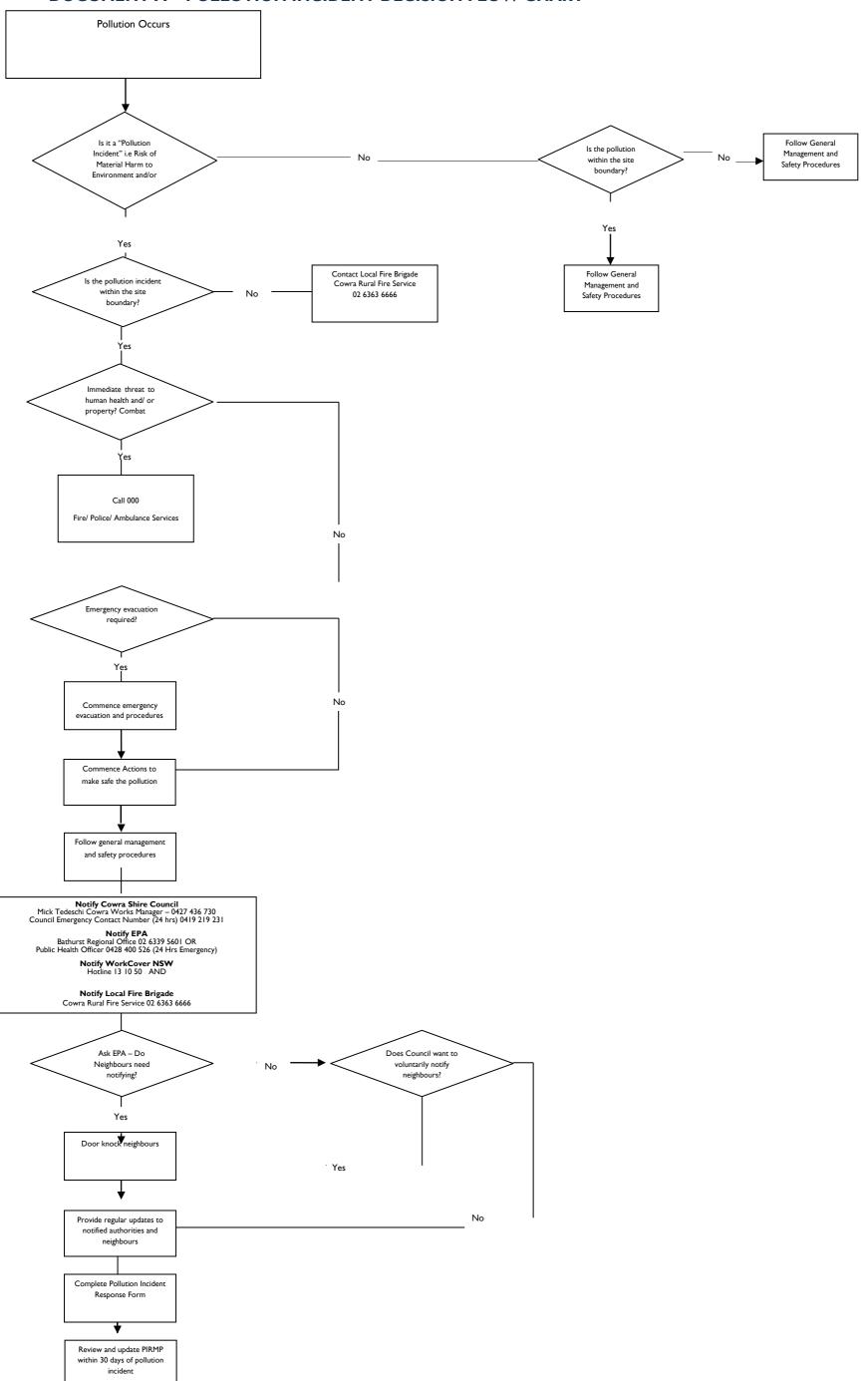
# Appendix A

- I. Document Control Summary
- 2. Pollution Incident Decision Flow Chart
- 3. Pollution Incident Reporting Form
- 4. Monitoring points MAP
- 5. Memo of changes

DOCUMENT CONTROL SUMMARY						
Version I	July 2012	Initial Document				
Version 2	July 2013	Mods from desktop exercise				
Version 3	July 2015	Minor changes				
Version 4	June 2016	Minor changes				
Version 5	June 2017	Minor changes				
Version 6	August 2018	Minor changes				
Version 7	July 2019	Minor Changes				
Version 8	July 2020	Minor changes				
Version 9	August 2022	Minor changes				
Version 10	June 2023	Minor changes				
Version II	August 2024	Minor changes				

DESKTOP EXERCISE TEST SUMMARY						
Version I	25 June 2013	Initial Document				
Version 2	I June 2016	Test Completed				
Version 3	8 June 2017	Test Completed				
Version 4	2 August 2018	Test Completed				
Version 5	13 June 2019	Test Completed				
Version 6	June 2020	Test Completed				
-	June 2021	Test Completed				
Version 7	May 2022	Test Completed				
Version 8	June 2023	Test Completed				
Version 9	August 2024	Test Completed				

#### **DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART**



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#### POLLUTION INCIDENT RESPONSE REPORTING FORM



Pollution Incident Management Plan Incident Reporting Form / Test Form

#### PIRMP - POLLUTION INCIDENT REPORTING FORM / TEST FORM

Incident/Test No.:		Location:			
Date:		Time:			
Duration of Incident:		Times			
Nature of Incident:					
т ,		Wind Direction &			
Temperature:		Speed:			
Relative Humidity:		Rainfall Since 9am:			
Fire Danger Rating:					
The location of the pla	ce where pollutions' occurring	or is likely to occur:			
The nature, the estimat	ted quantity or volume and the	concentration of any p	allut	ants invo	lved (if known):
The hacure, the estima	ica quantity or volume and the	concentration of any p	Olluc	aries irivo	ived (ii kilowii).
TI :	In tall the second second	LE d. Cd.		1 . //(1	``
The circumstances in v	which the incident occurred, inc	luding the cause of the	incid	ient (if Kr	iown):
The corrective action t	aken or proposed to be taken	to deal with the inciden	nt and	d any res	ulting pollution
or threatened pollution					
Have Council been not	ified?	□ Y	'es	□ No	
	ection Authority (EPA) been				
notified?	(2.7.)	□ Y	es	□ No	
Cowra Council	1				PIRMP
coma council	-				



## Pollution Incident Management Plan Incident Reporting Form / Test Form

Has the NSW Resources Regulator been notified?	☐ Yes ☐ No
Has NSW Ministry of Health (Via Public Health Units) been notified?	☐ Yes ☐ No
Has Work Cover NSW been notified?	☐ Yes ☐ No
Has Local Fire & Rescue NSW been notified?	☐ Yes ☐ No
Has EPA directed Council to notify neighbours?	☐ Yes ☐ No
If not, has Council voluntarily notified neighbours?	☐ Yes ☐ No
Authorised Persons Signatures:	
Name:	Position:
Signature:	Date:
Name:	Position:
Signature:	Date:
Cowra Council 2	PIRMP

#### **MONITORING POINTS - MAP**



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#### **COUNCIL'S MEMORANDUM OF CHANGES**



Cowra Shire Council Private Bag 342 Cowra NSW 2794

Phone: 02 6340 2000 council@cowra.nsw.gov.au www.cowracouncil.com.au

# Memorandum

From: Kris Beaumont	Department: Infrastructure & Operations
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Date: 30 August 2024

Re: Summary of changes made to PIRMP – Houghtons Quarry EPL 12713

Urgent	For Review	Please Comment	Please Recycle

With regards to the changes made to this PIRMP document to meet the EPA compliance requirements for EPL 12713 changes as follows:-

- Page 16 Fire & Emergency Evacuation Plan
- Page 17 Neighbour Details Map Updated
- Page 19 Document Control Summary

Works Engineer - Construction

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# Appendix B

#### **COUNCIL'S ENVIRONMENTAL RISK ASSESSMENT**

#### ASSESS THE RISKS

#### ESTABLISH THE CONSEQUENCE OR SEVERITY & ASSIGN A RATING OF LEVEL 1 TO 5

Consequence	Environmental Impact
Level 1	Limited damage to minimal area of low significance
Level 2	Minor effcts on biological or physical environment
Level 3	Moderate short term effects but not affecting eco-system
Level 4	Serious medium term environmental effects
Level 5	Very serious long term environmental impairment of eco-system

#### ESTABLISH THE PROBABILITY FACTOR OF THE EVENT

Description	Frequency Examples
Happens often	More than 1 event per month
Could easily happen	More than 1 event per year
Could happen and has occurred here or elsewhere	1 event per 1 to 10 years
Hasn't happened yet but could	1 event per 10 to 100 years (e.g. within a single mine life)
Conceivable, but only in extreme circumstances	Less than 1 event per 100 years (e.g. within life of BMA)

#### USING THE MATRIX BELOW DETERMINE THE RISK CATEGORY

			CONSEQUENCE SEVERITY				
		Level 1	Level 2	Level 3	Level 4	Level 5	
	Happens	High	High	Extreme	Extreme	Extreme	
œ	Could easily happen	Moderate	High	High	Extreme	Extreme	
Y FACTOR	Could happen and has occurred here or	Low	Moderate	High	Extreme	Extreme	
PROBABILIT	Hasn't happened yet but could	Low	Low	Moderate	High	Extreme	
PRC	Conceivable, but only in extreme circumstance	Low	Low	Moderate	High	High	

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					RISIDUAL RISK		
ENVIRONMENTAL ASPECT	HAZARD	RISK RATING	ENVIRONMENTAL OBJECTIVE	RISK MANAGEMENT	RATING	PIRMP ACTION	COMMENTS
Air	Dust	Moderate	The activity will be operated in a way that protects the Environmental Value of air.	<ul> <li>(a) Fugitive emissions of contaminants from storage, handling and processing of materials and transporting materials within the site are prevented or minimised.</li> <li>(b) Contingency measures will prevent or minimise adverse effects on the environment from unplanned emissions and shut down and start up emissions of contaminants to air.</li> <li>(c) Releases of contaminants to the atmosphere for dispersion will be managed to prevent or minimise adverse effects on environmental values.</li> </ul>	Level 1	Roads watered if necessary. Follow through on any complaints submitted. Roads sprayed with water during dusty periods Vegetation grown on waste/ topsoil stockpile to assist with erosion and dust control	Council shall ensure exposure to dust, fumes, mists, gases and vapours is as low as reasonably achievable and in compliance with regulatory requirements. A preliminary risk assessment indicates that the greatest environment risk at Council's quarries relates to dust.
Water	Oil and Grease	Low	The activity will be operated in a way that protects the Environmental Value of water.	All of the following—  (a) the storage and handling of contaminants will include effective means of secondary containment to prevent or minimise releases to the environment from spillage or leaks; (b) contingency measures will prevent or minimise adverse effects on the environment due to unplanned releases or discharges of contaminants to water; (c) the activity will be managed so that stormwater contaminated by the activity that may cause an adverse effect on an environmental value will not leave the site without prior treatment; (d) any discharge to water or a watercourse or wetland will be managed so that there will be no adverse effects due to the altering of existing flow regimes for water or a watercourse or wetland; (e) the activity will be managed so that adverse effects on environmental values are prevented or minimised.	Level 1	Large rain event (>25mm in 24 hour period): No work in the pit at any of the quarries.  A Ground Control Workplace inspection must be carried out before operations can resume in the pit. Large rain event elsewhere creating creeks to flood downstream: Unlikely to impact any of the Cowra Council quarries, but site inspections of surrounding waterways, creeks, diversion ponds is to be carried out. Drill and Blast contractors to be made aware of any geological variation that may indicate potential aquifers in the drilling area.  • Drill and blast contractors must immediately report any water coming from the drill holes observed because of drilling.  • Drill and blast contractors must immediately report any water observed following a blast.  • May be the use of oilgone on oil spills ( litre for litre)	

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Noise	Plant Operation	Moderate	The activity will be operated in a way that is mindful of the Community	All vehicles and mobile plant shall be inspected prior to the beginning of work, with any safety critical faults reported immediately and repaired prior to use by operators, sites must include criteria for pre-operational checks as set out in Pre-Start Check List	Level 1	The drill and blast contractors consult with Cowra Council prior to the commencement of drilling work programs, and drill patterns are approved by Cowra Council prior to drilling and blasting. It is during this period where discussions are had regarding the geology and potential of any water aquifers located in the drill and blast area.  Nearest resident located 250m from the quarry and is notified of blasting.	Prior to the commencement of work in any of the three Cowra Council quarries, the Quarry Manager, as part of his Pre-Start Checks must record his findings on the Ground Control Workplace Inspection Checklist. This will include inspection of the access road to the pit, the condition of the pit including dust, water pooling and inspection of the highwalls
Fire and Explosion	Fuel	High	The activity will be operated in a way that protects the Environmental Value of land.	The requirements and processes for fire or explosion prevention include fire control and maintenance of firefighting equipment. The Fire and Explosion Principal Mining Hazard Management Plan is yet to be developed.	Level 2	Fire - Each machine at the quarry and the amenities hut are equipped with appropriate fire extinguishers. Persons using fire extinguishers must advise the Production Manager so that recharging or replacement can be arranged. Fire extinguishers must be checked annually. Fuel — Contractor's fuel storage will be kept in a suitable bunded area so as to contain any fuel spills or leakages. No fuel or hydrocarbons are to be stored in the amenities hut.  Cowra Council will modify a suitable mobile road watering unit that can be used for the control of	Diesel will be stored and distributed from a suitably constructed storage unit.  This unit will be a mobile fuel cart and will be towed by a suitable vehicle.  • There will be no chemicals, combustibles or flammables stored on any of the three Cowra Council quarries.  • Apart from small quantities of diesel, oils, lubricants or welding gases, there will be no other chemicals or products brought to site when the quarries are in operation.
Vibration	Plant operation	Moderate	The activity will be operated in a way that protects the Environmental Value of land.	Stockpiling, materials processing, concrete batching and other activities associated with the operation.	Level 3	small grass or bushfires	

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