Pollution Incident Response Management Plan (PIRMP) - NSW -



VERSION AND ISSUE:

Version 16 – 20 November 2026

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1. What is this plan about?

The purpose of this document is to satisfy J.J. Richards & Sons Pty Ltd t/a JJ's Waste & Recycling ('JJ's'), Southern Oil Collections ('SOC'), Aztech Services ('Aztech'), CreatEnergy ('CreatEnergy') and Handybin Waste Services ('Handybin') obligations to prepare a Pollution Incident Response Management Plan ('PIRMP') as required by Section 153A of the *Protection of the Environment Operations Act 1997 (NSW)* ('the Act').

JJ's has prepared this PIRMP for the following activities:

- Licence No.10870 – Liquid Waste Treatment Facility located at Units 23-24/20 Tucks Road, Seven Hills NSW[1];
- Licence No.21053 – Liquid Waste Treatment Facility located at 14 Rayben Street, Glendenning NSW;
- Licence No.10060 – Liquid Waste Storage and Transfer Facility located at Treatment Works Access Road, Forest Hill NSW;
- Licence No.20613 – Material Recycling Facility located at 25 Englands Rd, Coffs Harbour NSW;
- Licence No.6427 – Transport of Trackable Waste across various locations in NSW;
- Licence No.6099 – Waste Processing and Storage Facility located at 1 Daintree Place, Gosford West NSW[1];
- Licence No.22005 – Mobile Waste Processing Unit (CreatEnergy); and
- Licence No.22060 – Hydrocarbon Waste Storage and Transfer Facility at 5-7 Rayben Street, Glendenning NSW.

2. Contact Details – Regulatory Authorities

Table 1 – Regulatory Authorities Details

Regulatory Authorities	Contact Number
EPA NSW	131 555
SafeWork NSW	131 050
NSW Health	(02) 9391 9000
Fire & Rescue NSW	000
Coffs Harbour Fire & Rescue	(02) 6690 6157
Gosford Fire & Rescue	(02) 4337 9724
Wagga Fire & Rescue	(02) 6929 5780
Blacktown City Council (Glendenning & Seven Hills)	(02) 5300 6000 After Hours Emergency – 1300 133 491
Central Coast Council (Gosford)	(02) 4306 7900 After Hours Emergency – (02) 4306 7900
City of Coffs Harbour Council (Coffs Harbour)	(02) 6648 4000
Wagga Wagga City Council (Forest Hill)	(02) 6926 9100 or 1300 292 442
Other Local Authorities	Dependent on location of incident Link to council contact details: https://www.olg.nsw.gov.au/public/local-government-directory

[1] *Seven Hills and Gosford West Facility currently non-operational, EPL being retained.*

3. Notification Procedures

In accordance with the JJ's established Emergency Procedures, the following table identifies the notification responsibilities of the following personnel (where relevant):

Table 2 – Notification Responsibilities - Site Incident

Role	Responsibility	Contact Number
Emergency Team	In the event of an incident at a JJ's site, the internal site emergency team must immediately notify all personnel on the site in accordance with: ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communication Officer. Relevant site emergency team listed within FM-33 Emergency Action.	Emergency team contact numbers listed within FM-33 Emergency Action.
Communications Officer	Responsible for activating the PIRMP, must follow responsibilities within EM-03 Emergency Response Team Responsibilities – Communication Officer and immediately notify: ▪ Relevant site manager/supervisor; ▪ Affected neighbours; and ▪ Emergency services (where required). Relevant site communications officer listed within FM-33 Emergency Action.	Site managers / supervisors: ▪ **Glendenning – 14 Rayben** [redacted] ▪ **Glendenning – 5-7 Rayben** [redacted] ▪ **Seven Hills** [redacted] ▪ **Wagga Wagga / Forest Hill** [redacted] ▪ **Gosford / Mobile Processing Unit** [redacted] ▪ **Coffs Harbour** [redacted]

Role	Responsibility	Contact Number
		○ [redacted]
Site Manager/Supervisor	To immediately notify and provide one (1) hourly updates too: ▪ Environment; and ▪ HSEQ. To: ▪ Assist the emergency team with relevant notifications where required; and ▪ Contact ISS First Response if required – 1300 131 001. **Note:** site manager / supervisor may be part of the site emergency team also and have additional responsibilities as a deputy warden, warden or communications officer.	**Environment** [redacted] **HSEQ** [redacted] ▪ [redacted]
Environment	[redacted] or [redacted] to notify EPA NSW where required in accordance with the internal protocol.	EPA NSW – 131 555.
HSEQ – JJ's	[redacted] or [redacted] to notify SafeWork NSW where required.	SafeWork NSW – 13 10 50.

Table 3 – Notification Responsibilities - Transport Incident

Role	Responsibility	Contact Number
Vehicle Operator	Follow the relevant EPG and contact relevant supervisor / manager of the incident immediately and where safe to do so. Each driver has the contact details of their supervisor / manager and a radio is available in the cabin with direct contact to Operations.	▪ **Newcastle** [redacted] ▪ **Wagga Wagga / Forest Hill** [redacted] ▪ **Gosford** [redacted] ▪ **Sydney / Glendenning** [redacted] ▪ **Wollongong**

Role	Responsibility	Contact Number
		[redacted] ▪ **Coffs Harbour** [redacted] ▪ **ACT** [redacted] ▪ **Aztech** [redacted]
Transport Manager/Supervisor	▪ Ascertain the nature of the emergency and implement appropriate action with reference to the relevant internal EPG. ▪ Confirm that the appropriate Emergency Service has been notified (if required) - Call 000 if not. ▪ Provide instructions to JJ's employees assisting in the incident. ▪ Immediately notify JJ's Environment and provide one (1) hourly updates. ▪ Immediately notify HSEQ and provide one (1) hourly updates. ▪ Notify any surrounding premises / businesses to notify them of the emergency (if emergency could affect their occupants or property) and advise of the following: o What the emergency is i.e. fire; o Whether the emergency services have been called; o The location of the emergency in comparison to their premises. ▪ In the event the emergency continues after two (2) hours, updates must be provided to the affected premises at least every two (2) hours. ▪ Call premises to notify them that the emergency has been appropriately managed and no	**Environment** [redacted] **HSEQ – JJ's** [redacted] **HSEQ – Aztech** [redacted]

Role	Responsibility	Contact Number
	longer poses a risk to their premises. ▪ Compile a report of the actions taken during the emergency for the debrief. **Note:** The Transport Manager / Supervisor may delegate the above-mentioned responsibilities to another appropriate and responsible JJ's employee.	
Environment	[redacted] or [redacted] to notify the EPA where required in accordance with the internal JJ's Environment protocol.	EPA NSW – 131 555.
HSEQ – JJ's	[redacted] or [redacted] to notify SafeWork NSW where required.	SafeWork NSW – 13 10 50.
HSEQ – Aztech	[redacted] or [redacted] to notify SafeWork NSW where required.	SafeWork NSW – 13 10 50.

4. Updates & Reviews

The JJ's Environment Team shall review the PIRMP on a 6-monthly basis to ensure:

- all the sites listed are still accurate;
- all contacts listed are the same;
- any sections of the legislation changed re. the PIRMP.
    - if so,
        - do the Act / Reg name / year need updating?
        - do the section numbers need updating?
        - do the section headings need updating?
        - is further information required to be included?
- all the internal training / procedures / manual section references are correct.

The review is set within the electronic calendars, and any amendments are tracked via tracked changes and saved to the internal PIRMP file for NSW.

Following the annual evacuation test for each site / transport operation, the relevant managers will discuss with JJ's Environment if any amendments are required to the PIRMP. JJ's Environment will liaise with the managers, make the changes and advise all relevant personnel of the updates made to the PIRMP and provide with an updated copy for their records.

5. Management Acknowledgement

Each relevant manager / supervisor of the site(s) and/or transport operations the PIRMP is relevant to must sign off on the acknowledgement in Attachment 15[2] to confirm that they understand the PIRMP and their responsibilities as the relevant manager / supervisor.

[2] *Managed via the PIRMP LMS module from Version 12 of the PIRMP onwards.*

6. PIRMP Compliance Matrix

The purpose of this section is to outline the legislative requirements for a PIRMP under the Act and the *Protection of the Environment Operations (General) Regulation 2022* (NSW) ('the Regs') and documents within Integrated Management System (IMS) which evidence compliance has been achieved.

JJ's IMS links all aspects of the Company's operations including quality, health, safety and environmental management. On a day-to-day basis, the IMS is implemented via a Site Based Management Plan, which provides guidelines on how an individual site can achieve compliance with the IMS and forms the basis of this PIRMP.

Table 4 – Compliance Matrix – Site Based Requirements

Required Details	Legislation	EPA Guideline	JJ's IMS
Written form and accessible	s 71(a) & 74 (1) - the General Regulation s153C & s153D the Act	The plan must be in written form and available at the premises so it can be provided to an authorised EPA officer on request. Safeguards must be put in place to ensure the PIRMP is readily accessible in the case of power failure or internet outage. A hard copy of the PIRMP is recommended to be maintained at the licensed premises or where the activity takes place.	The PIRMP is a written document. The document is available via the JJ's Website. Full hard copies relevant to each site are readily accessible onsite and will be provided to an EPA officer upon request.
Description and likelihood of hazards	s 72(a) & 72(b) - the General Regulation	Plans must provide a description of the main hazards to human health and/or the environment associated with the activity being undertaken at the premises or where the activity takes place, the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood. Potential hazards could include spills and unintended discharges such as from: ▪ Sedimentation dams ▪ Material transfer points ▪ Workshops ▪ Wastewater or chemical storage areas ▪ Underground and above ground storage tanks ▪ Fuel tanks ▪ Generation or storage areas for waste materials Other potential hazards may be due to the failure of plant or equipment, for example: ▪ Ruptured containment tanks ▪ Uncontrolled release of gas ▪ Effluent storage dam failures ▪ Breakage of pipes ▪ Malfunctioning of valves ▪ Disruption to manufacturing processes ▪ Power failure ▪ Fire Plans must also consider the range of circumstances that could contribute to a pollution incident such as: ▪ Power failure ▪ Natural disasters such as bushfires, floods or major storm events ▪ Materials and equipment brought onto the premises by contractors ▪ Vegetation and other combustible material on or bordering the premises.	Refer to the Facilities Manual: Section 1 – Risk Management. Site Risk Assessments Each site is required to complete and maintain the following site-based risk assessments: ▪ SRA-001 Site Depot Risk Assessment – (Attachment 1) ▪ SRA-007 Site Emergency Identification and Analysis – (Attachment 2) These assessments include a review/description of the potential hazards to human health and/or the environment associated with the activities undertaken at the site. The assessments also review the likelihood of such hazards occurring and ensure there are appropriate controls in place to manage the risks. Refer to Section 30 – Environmental Management of the Facilities Manual for guidance on environmental risk and management.

Required Details	Legislation	EPA Guideline	JJ's IMS
		Licensees of a facility near a sensitive environment, such as a densely populated area, school, hospital or water body, must consider the increased risks of environmental or health impacts of a pollution incident. Licensees of a facility which is located near other facilities which handle dangerous or explosive materials must consider the likelihood of any impacts on neighbouring facilities and consider employing measures to reduce or minimise impacts from a pollution incident which could set off a pollution incident at those facilities.	
Pre-emptive actions to be taken	s 72(c) - the of the General Regulation	Plans must include 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. Pre-emptive actions can include the provision and use of spill containment kits, the installation and operation of stormwater cut-off valves, and the installation and use of fire-containment water tanks.	Facilities Manual: Section 1 – Risk Management; Section 30.4 – Spills; Section 28 – Incident Management; Section 29 – Emergency Management. Emergency Procedure Guides - (Attachment 3) available onsite for quick access and use. FM-33 Emergency Action - (Attachment 4) provides details of internal and external contacts in the event of an incident. All employees appropriately trained in internal training packages for emergency preparedness: ▪ TRN-14.01-01 Fire and Emergency – Truck – (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency – Site – (Attachment 7) ▪ JJ's Spill Response Training Module
Inventory of pollutants	s 72(d) and 72(e) - the General Regulation	Plans must include an inventory of potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises. Pollutants can include, but are not limited to, chemicals used in cleaning or production processes, fuels and lubricants used for equipment or machinery, gas cylinders, waste materials or wastewater, effluents and sediment-contaminated stormwater.	Facilities Manual Section 21 - Managing Hazardous Chemicals on Site. Glendenning holds manifest quantities onsite and keep an updated copy of their Manifest (Attachment 14).

Required Details	Legislation	EPA Guideline	JJ's IMS
		Details of the pollutant storage locations, including underground storage tanks and storage methods, must also be included. See the requirement for a map in the relevant section below.	Site plans identify areas onsite containing wastes and/or chemicals.
Safety equipment	s 72(f) - the General Regulation	Plans must include 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. Specific details must be provided in relation to any site or activity-specific safety equipment and must include the location where this equipment is stored and the material safety data information for any chemicals or fuels used or stored at the premises. For example, this could include specific personal protective equipment required for the handling of hazardous chemicals or radioactive substances, specific gas monitoring meters used to monitor gas leaks from tanks, floating booms used to contain spills on water bodies, and specific spill containment equipment.	Emergency Diagram – shows location of firefighting equipment – (Attachment 12). Spill management and spill kit contents: Facilities Manual: Section 30.4 – Spills. Site plans include locations of spill kits also (Attachment 13). Emergency Management – Facilities Manual: Section 29.2 – Emergency Preparedness; Section 29.3 – Emergency Equipment; Section 29.4 – Fire Safety Maintenance. FM-25 Fire Fighting Equipment Register – (Attachment 8). All employees are trained in fire and emergency management via our internal training modules: ▪ TRN-14.01-01 Fire and Emergency – Truck – (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency – Site – (Attachment 7) ▪ JJ's Spill Response Training Module
Contact details	s 72(g) and (h) - the General Regulation s153C - the Act	The names, positions and 24-hour contact details of individuals who are responsible for activating the plans and managing the response; those authorised to notify relevant authorities, including all five relevant authorities under section 148 of the POEO Act; and those responsible for managing the response to a pollution incident. In addition, plans must include the contact details of the EPA, the local council, NSW Health, SafeWork NSW, and Fire and Rescue NSW and/or Rural Fire Service, relevant to the licensee's premises. The contact details of any other organisation or agency that needs to be advised of the incident should also be included in plans, for example the Department of Planning	Refer to: ▪ Section 1 – Contact Details – Regulatory Authorities; ▪ Section 2 – Notification Procedures; and ▪ FM-33 Emergency Action – (Attachment 4). Facilities Manual: Section 28.6 – Environmental Incidents.

Required Details	Legislation	EPA Guideline	JJ's IMS
		and Infrastructure, and Department of Primary Industry.	
Communicating with neighbours and the local community	s 72(i) - the General Regulation	Communicating with neighbours and the local community is an important element in managing the response to any incident. Plans must include details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by an incident occurring on the premises. Communication mechanisms can include incident notifications placed on the licensee's website or social media networks (such as Twitter or Facebook); the use of telephone calls or SMS or other messaging systems; emails to community representatives (for example, a protocol agreed to via a community consultative committee process); and letterbox drops and doorknocking of affected community members, as appropriate to the circumstances. Plans must also include any specific information that could be provided to the community so it can minimise the risk of harm. For example, this could include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water in creeks or rivers affected, or likely to be affected, by a pollutant discharge. The licensee must consider the types of pollution incidents that are likely to occur at the premises. In determining the extent of community notification for potential air emissions, the licensee should consider aspects such as the type of pollutant, prevailing winds, height and magnitude of an emission, as well as the location of any on-site fallout or off-site impacts, the likelihood of the pollutant reaching ground level, and possible impacts on sensitive receptors. As the location, geography and proximity to neighbours varies for each licensed premises, each licensee must consider the types of pollutant incidents that are likely to occur at the premises and the extent to which those incidents may have an impact on neighbouring industrial, residential or community premises. Consideration must be given to notifying any sensitive premises in close proximity, such as schools, pre-schools, nursing homes and hospitals.	FM-33 Emergency Action – (Attachment 4). provides: ▪ The site's emergency team members; and ▪ Surrounding neighbour contact details to enable quick notification. In addition, the key contact details and relevant notification procedure is included within Section 1. Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within: ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden (Attachment 16); ▪ EM-02 Emergency Response Team Responsibilities – Warden (Attachment 17); and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 18) Refer to SRA-007 Site Emergency Identification and Analysis – (Attachment 2).
Minimising harm to persons on the premises	s 72(j) - the General Regulation	Plans must include any actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises should an incident occur. These can include the activation of evacuation procedures, clearly advertising muster locations	Facilities Manual: Section 29 Emergency Management.

Required Details	Legislation	EPA Guideline	JJ's IMS
		to site personnel, or activating visible and/or audible warning alarms. Consideration should also be given to having available at short notice suitable consultants to provide expert medical, toxicology or environmental impact advice.	FM-33 Emergency Action - (Attachment 4). provides: ▪ The site's emergency team members; and ▪ Contact details to enable quick notification. In addition, the key contact details and relevant notification procedure is included within Section 1. Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within: ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden (Attachment 16); ▪ EM-02 Emergency Response Team Responsibilities – Warden (Attachment 17); and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 18) Evacuation Diagrams clearly identified around the site - (Attachment 12)
Maps	s 72(k) - the General Regulation	Plans must include a detailed map (or set of maps) showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises (including underground tanks), the location of any stormwater drains on the premises, overland flows, drainage pathways and the discharge locations of the stormwater drains to the nearest watercourse or water body. Maps should also show the location of safety equipment, pollution control and pollution response equipment, mains and master switches and the PIRMP and emergency plans.	Site plans/maps contain all relevant information in accordance with this requirement – (Attachment 13).
Actions to be taken during or	s 72(l) - the General	Plans must include detailed descriptions of the actions that will be taken by the licensee immediately after a pollution incident to reduce or control any	Facilities Manual: Section 28.6 – Environmental Incidents provides the internal

Required Details	Legislation	EPA Guideline	JJ's IMS
immediately after a pollution incident	Regulation s153C - the Act	pollution. These should include, as a minimum, early warnings, updates and actions to be taken during and after an incident. Actions may include the deployment of spill containment equipment, activation of stormwater shut-off valves, and shutdown of processes or equipment. Consideration must also be given to assessing how any clean up from an incident will be undertaken, including the procedures to be followed such as the engagement of contractors and use of clean-up equipment like waste disposal tankers and waste disposal facilities. As the costs associated with the clean-up of an incident can be significant – in past cases these have been in excess of $1 million – consideration must also be given to funding arrangements, such as taking out appropriate insurance or having contingency funds available. The cost of any clean up that is undertaken by emergency response agencies and the EPA will generally be recovered from the company or individual responsible for the pollution incident.	procedure which must be followed in the event of an incident. Emergency Procedure Guides - (Attachment 3). EPGs for spills and fires are available at the premises for use by any employee which provides clear instructions and guidance on initial management of the incident. Further to this, Section 1 provides the relevant responsibilities and notification procedures during an incident. Facilities Manual: Section 29 Emergency Management. Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within: ▪ TRN-14.02-01 Emergency Team – Warden – (Attachment 9); ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden (Attachment 16); ▪ EM-02 Emergency Response Team Responsibilities – Warden (Attachment 17); and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 10). All employees are trained in fire and emergency management via our internal training modules: ▪ TRN-14.01-01 Fire and Emergency – Truck – (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency – Site – (Attachment 7) ▪ JJ's Spill Response Training Module

Required Details	Legislation	EPA Guideline	JJ's IMS
			Notification requirements identified within Section 1.
Staff training	s 72(m) - the General Regulation	Plans must include details on the nature and objectives of any staff training program on implementing the plans. Details of the training program must include the frequency of training and how the records of any training are kept. Suitable training could include toolbox talks, formal staff training on incident management, and undertaking simulated incident exercises, including with emergency services. The training needs to be suitable for the level of risk and likelihood of incidents at the premises.	Emergency drills must be conducted at least annually as required by Section 29.2 of the Facility Operating Manual. Following the emergency training, FM-32 Emergency Reaction Debriefing – (Attachment 11), must be completed to identify: ▪ The type of scenario conducted; ▪ The persons involved; ▪ The date/time of scenario; ▪ Procedures used as part of the scenario i.e. the PIRMP; and ▪ Feedback on the success of the scenario. Where the site considers improvements are required to the PIRMP following a scenario, they must contact JJ's Environment who will assist in the relevant amendments. Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within: ▪ TRN-14.02-01 Emergency Team – Warden – (Attachment 9); ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer (Attachment 10). All employees are trained in fire and

Required Details	Legislation	EPA Guideline	JJ's IMS
			emergency management via our internal training modules: ▪ TRN-14.01-01 Fire and Emergency – Truck – (Attachment 6); ▪ TRN-14.01-02 Fire and Emergency – Site – (Attachment 7); and ▪ JJ's Spill Response Training Module
Testing plans	s 72(n), 72(o), 72(p) and 75 - the General Regulation s153E - the Act	Plans must be tested routinely at least once every 12 months. The testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. Usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including effectiveness of training. Plans must include the manner in which they are to be tested and maintained, the dates on which they have been tested, the names of the staff members who carried out the testing, and the dates they were updated.	PIRMP will be tested: ▪ annually as part of the annual emergency drill; and/or ▪ within one (1) month of any pollution incident occurring. Date of test, person testing is recorded on FM-32 Emergency Reaction Debriefing – (Attachment 11). Facilities Manual: Section 29 Emergency Management.
Community engagement	S 73(b)(iii)- the Regs	Plans must include community engagement protocol that includes notifying people living or working in the vicinity of a pollution incident and keeping them informed of relevant matters.	Emergency Procedure Guides – (Attachment 3). FM-33 Emergency Action – (Attachment 4). Facilities Manual: Section 29 Emergency Management.

Table 5 – Compliance Matrix – Trackable Waste Transport Based Requirements

Required Details	Legislation	EPA Guideline	JJ's IMS
Written form and accessible	s71 and 74 - the General Regulation s153D – the Act	The plan must be in written form and available at the premises so it can be provided to an authorised EPA officer on request. Safeguards must be put in place to ensure the PIRMP is readily accessible in the case of power failure or internet outage. A hard copy of the PIRMP is recommended to be maintained at the licensed premises or where the activity takes place.	The PIRMP is a written document and is also available via the JJ's Website. For waste transport activities, EPGs are maintained within each JJ's vehicle as per Section 5.4 of the Transport Manual. A copy of the PIRMP can be made available to

Required Details	Legislation	EPA Guideline	JJ's IMS
			drivers where required.
Contact details	s73(b)(i) and (ii) - the General Regulation s153C – the Act	Plans must include the names, position titles and 24-hour contact details of those key individuals who are: a) responsible for activating the PIRMP; b) authorised to notify relevant authorities under section 148 of the POEO Act; c) responsible for managing the response to a pollution incident. The contact details relevant for the location where the incident occurs for: d) the EPA e) Fire and Rescue NSW and/or Rural Fire Service f) SafeWork NSW g) NSW Health h) the local council. In addition to the details listed above, the PIRMP should include: ▪ how the relevant local council and the relevant area health service (NSW Local Public Health Unit), will be determined as these will be specific to the location of the incident. ▪ Who will make that determination ▪ The contact details for those local councils and relevant health services ▪ who will contact those authorities (these tasks might be the responsibility of personnel at the waste transport company's base of operations). The PIRMP should specify the roles of the driver and of the people implementing the notification requirements.	Refer to: ▪ Section 1 – Contact Details – Regulatory Authorities; and ▪ Section 2 – Notification Procedures. In the event of an incident during transport operations, Supervisors responsible for activating the PIRMP will determine the relevant local council where the incident occurs. Such information is quickly accessible via the internet.
Community engagement	s 73(b)(iii) - the General Regulation s153C – the Act	Plans must include community engagement protocol that includes notifying people living or working in the vicinity of a pollution incident and keeping them informed of relevant matters.	In the event of an incident during transport, the relevant transport manager/supervisor resumes the role of 'Communications Officer' and is responsible for activating the PIRMP and notifying neighbours where required. Noting the manager/supervisor may delegate these duties to another responsible JJ's employee. Refer to Section 2 – Notification Procedures.
Pre-emptive actions to be taken	73(b)(iv) - the General Regulation	Plans must include: ▪ Detailed descriptions of the actions to be taken immediately after the pollution incident to reduce or control any pollution	Drivers are appropriate trained on our internal procedures, including: ▪ TRN-14.01-01 Fire and Emergency –

Required Details	Legislation	EPA Guideline	JJ's IMS
	s153C – the Act	▪ Pre-emptive actions for trackable waste transporters to avoid the escape of waste during transportation. At a minimum, the pre-emptive actions should comply with the requirements set out in sections 70, 72 and 73 of the Protection of the Environment Operations (Waste) Regulation 2014. This includes: ▪ Vehicles must transport waste in a manner that avoids spilling, leaking or otherwise escaping. ▪ The waste must be covered during transportation unless the waste consists solely of waste tyres or scrap metal. ▪ Vehicles must carry a copy of the environment protection licence, and a spill kit during all transportation. They are also required to carry any Guide set out in the yellow section of HB 76:2010, Dangerous Goods – Initial Emergency Response Guide applicable to the waste being transported. ▪ Vehicles must ensure that incompatible wastes are not transported together, and any liquid waste, or waste that has been segregated is not mixed with other wastes. Transporters must ensure that waste is transported in a manner that avoids spillage, leakage or escape (i.e. ensuring all waste is covered during transportation) ▪ Transporters of liquid waste must also ensure that the waste is able to be sampled by the release of suitable and accessible valves.	Fire and Emergency Truck ; ▪ TRN-18.09-07 Hazardous Waste and Waste Tracking (NSW); ▪ TRN-GEN-100-04 Prestart & end of day checks; ▪ JJ's Spill Response Training Module; and ▪ TRN-GEN-100-03 Safe driving practices. Emergency Management Vehicle or load fires and spills are managed in accordance with Section 20 of the Transport Manual. Spill kit requirements are outlined in Section 20.4 of the Transport Manual. Emergency Procedure Guides Refer to the following Emergency Procedure Guides: ▪ EPG-Spills; ▪ EPG All Other Vehicles; and ▪ EPG – Vehicle Fire Rear/Front/SOLO. Vehicle Maintenance As per Section 17 of the Transport Manual, all JJ's vehicles are maintained to a high standard by Fleet to ensure the vehicles are fit for use and purpose. Maintenance and inspection frequencies are recorded with GateKeeper to ensure schedules are complied with. Vehicle Documentation A copy of the licence is maintained within each vehicle that conducts the transport of

Required Details	Legislation	EPA Guideline	JJ's IMS
			hazardous waste. Refer to Section 5 of the Transport Manual. Pre-start and end of day checks Spill kit availability and vehicle condition are checked during the driver pre-start and end of day checks.
Staff training	73(b)(v) of the General Regulation	Plans must include details on the nature and objectives of any staff training program on implementing the plans. Details of the training program must include the frequency of training and how the records of any training are kept. Suitable training could include toolbox talks, formal staff training on incident management, and undertaking simulated incident exercises, including with emergency services. The training needs to be suitable for the level of risk and likelihood of incidents at the premises.	Employees involved in the transport of hazardous waste are required to undertake the following training packages: ▪ TRN-14.01-01 Fire and Emergency – Fire and Emergency Truck; ▪ TRN-18.09-07 Hazardous Waste and Waste Tracking (NSW); ▪ TRN-GEN-100-04 Prestart & end of day checks; ▪ JJ's Spill Response Training Module; and ▪ TRN-GEN-100-03 Safe driving practices. LMS is utilised to track when refresher training is due for employees. Emergency Procedure Guides Each vehicle has copies of the relevant Emergency Procedure Guides available for use: ▪ EPG-Spills; ▪ EPG All Other Vehicles; and ▪ EPG – Vehicle Fire Rear/Front/SOLO.
Testing plans	s73(b)(vi), 73(b)(vii) and 75 - the General Regulation	Plans must be tested routinely at least once every 12 months. The testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. Usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including effectiveness of training.	Testing of the PIRMP is conducted on a 12 monthly basis as part of a team brief or within one (1) month of an incident occurring involved trackable waste transport. An emergency practical drill (e.g. for a spill or fire) is undertaken with drivers to test the

Required Details	Legislation	EPA Guideline	JJ's IMS
		Plans must include the manner in which they are to be tested and maintained, the dates on which they have been tested, the names of the staff members who carried out the testing, and the dates they were updated.	effectiveness of the PIRMP. FM-32 Emergency Reaction Debriefing - (Attachment 11) is used to record the scenario.

7. Availability of PIRMPs

As required by section 153D of the Act, full copies of each PIRMP for the above-mentioned activities are maintained at the following locations:

- 14 Rayben Street, Glendenning NSW;
- 5-7 Rayben Street, Glendenning NSW;
- Units 23-24/20 Tucks Road, Seven Hills NSW;
- 25 Englands Rd, Coffs Harbour NSW;
- Treatment Works Access Road, Forest Hill NSW;
- 1 Daintree Place, Gosford West NSW; and
- Wherever the Mobile Waste Processing Unit (CreatEnergy) is located.

A full copy of a site-specific PIRMP can be made available upon written request.

8. Attachments

- Attachment 1 – SRA-001 Site Depot Risk Assessment
- Attachment 2 – SRA-007 Site Emergency Identification and Analysis
- Attachment 3 – Emergency Procedure Guides (EPGs)
- Attachment 4 – FM-33 Emergency Action
- Attachment 5 – Vehicle Spot Checklist (Managed via IRS)
- Attachment 6 – TRN-14.01-01 Fire and Emergency – Truck (Managed via LMS)
- Attachment 7 – TRN-14.01-02 Fire and Emergency – Site (Managed via LMS)
- Attachment 8 – FM-25 Fire Fighting Equipment Register
- Attachment 9 – TRN-14.02-01 Emergency Team-Warden
- Attachment 10 – EM-01, EM-02 & EM-03 Emergency Response Team Responsibilities
- Attachment 11 – FM-32 Emergency Reaction Debriefing (Managed via IRS)
- Attachment 12 – Evacuation Diagram
- Attachment 13 – Site Plans
- Attachment 14 – Site Manifest (Glendenning)
- Attachment 15 – PIRMP Management Acknowledgement (Managed via LMS)

Attachment 1 – SRA-001 Site Depot Risk Assessment

Link to Depot Specific Document Control Register – **Risk Assessment to be saved in this location**

Attachment 2 – SRA-007 Site Emergency Identification and Analysis

Link to Depot Specific Document Control Register – **Risk Assessment to be saved in this location**

Attachment 3 – Emergency Procedure Guides (EPGs)

The latest version of all JJ's EPGs are accessible via Pyxis.

Attachment 4 – FM-33 Emergency Action

Refer to the latest version of the Site Emergency Management Plan (SEMP).

Link to Depot Specific Document Control Register – SEMP to be saved in this location.

Attachment 5 – FM-50 Vehicle and Plant Spot Checklist

Completed in GateKeeper OnRoad from 2026 onwards – no attachment required.

Attachment 6 – TRN-14.01-01 Fire and Emergency-Truck

Link to document

Attachment 7 – TRN-14.01-02 Fire and Emergency – Site

Link to document

Attachment 8 – FM-25 Fire Fighting Equipment Register

Attachment 9 – TRN-14.02-01 Emergency Team-Warden

Link to document

Attachment 10 – EM-01, EM-02 & EM-03 Emergency Response Team Responsibilities

Attachment 11 – FM-32 Emergency Reaction Debriefing

Completed in Donesafe from 2026 onwards – no attachment required.

Attachment 12 – Evacuation Diagrams

Attachment 13 – Site Plans

Attachment 14 – Site Manifest (Glendenning)

Attachment 15 – PIRMP Management Acknowledgement[3]

I have read and understood the most current version of the Pollution Incident Response Management Plan ('PIRMP') and understand that I am responsible for activating the PIRMP in the event of a pollution incident which occurs onsite or during transport operations of which I manage / supervise.

I confirm that I understand:

- the notification requirements as identified within Section 2 of the PIRMP and my responsibilities associated with implementation of the PIRMP and subsequent notifications in the event of a pollution incident;
- all methods of compliance listed within the Section 5 compliance matrix and will ensure my site and/or transport operations meet compliance as stated; and
- that the PIRMP must be available on site, readily accessible and tested at least annually.

Date	Name	Position	Signature

3 Replaced by LMS system.