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Pollution Incident Response Management Plan

Biodiesel Industries Australia Pty Ltd EPL 12627

Doc No:	Pollution Incident Response Management Plan		
Doc Owner:	Group Manager Environment		
Approval:	Business Manager- Biodiesel Industries Australia		

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1. Introduction

1.1 BACKGROUND

Biodiesel Industries Australia (BIA) is a Bloomfield owned company specialising in the manufacture of biodiesel. Located in Maitland NSW, BIA has been in operation since 2003 with capacity to produce up to 20 million litres per annum. BIA has a reputation for producing high quality product compliant with the Australian Fuel Quality Standard. The production facility is based at 62 Racecourse Road Rutherford, New South Wales (NSW).

It is the policy of BIA to strive to achieve a high standard of care for the natural environment and local community in all of the activities in which we engage during the production of biodiesel.

BIA is committed to the prevention, in so far as is reasonably practicable, of harm to the natural environment and local community through the identification and control of environmental hazards. In the course of operations, incidents and other events may occur that require a response in order to either prevent the incident from reoccurring or to minimise negative and/ or maximise positive impacts of the incident.

BIA operate under Environment Protection Licence (EPL) 12627, issued by the Environment Protection Authority (EPA) NSW in accordance with the Protection of the Environment Operations Act 1997 (POEO Act). As per the POEO Act requirements, Bloomfield must prepare, maintain, test, and implement a Pollution Incident Response Management Plan (PIRMP) in line with Section 153A under Part 5.7 of the POEO Act.

This Management System document therefore demonstrates compliance to the POEO Act and the Protection of the Environment Operations (General) Regulation 2022 (the General Regulation). It also provides information and the Procedures to guide the response to managing environmental incidents, including reporting to authorities.

1.2 SCOPE

This PIRMP has been prepared in accordance with the requirements of Part 5.7A of the POEO Act. The scope of this plan is to address the statutory requirements for managing and responding to pollution incidents related to the activities governed by the EPL. The following sections outline how this PIRMP meets each specific requirement of the Act:

- Duty to Prepare and Implement Pollution Incident Response Management Plans (Section 153A).
- Information to be Included in the Plan (Section 153C).
- Keeping of the Plan (Section 153D).
- Testing of the Plan (Section 153E).
- Implementation of the Plan (Section 153F).

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The PIRMP focuses on minimising the risk of pollution incidents and effectively managing any that occur, ensuring the health and safety of employees, nearby neighbours, and the environment. It specifies the notification procedures for pollution incidents that cause or threaten material harm, as defined in the POEO Act.

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

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

Table 1-1: 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 4.4
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 and 4.4
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 PIRM plan—the Act, s 153C	
For the Act, section 153C(d), the following matters must be included in a PIRM plan:	
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 3.5
b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Section 3.5
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 3.6 and 4.2

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Detail Required	Section in PIRMP
d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Section 3.4
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 3.4
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 3.7
g) The names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> 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 3.2 and 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 4.1 Error! Reference source not found. and 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, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,	Sections 2.1 and 3.4
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,	Sections 3.5
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 PIRM plan must be tested and maintained.	Section 5.2 and 5.3

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1.3 DEFINITIONS

In implementing this PIRMP, the POEO definitions included in Table 1-2 are applied in the event of an incident.

Table 1-2: *Definition*

Terms	Definition as defined in POEO Act 1997
Pollution	“Pollution means – water pollution, or air pollution, or noise pollution, or land pollution” ¹
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”.
Material Harm	<p>As defined in Section 147 of the Act:</p> <p>a) Harm to the environment is material if:</p> <ul style="list-style-type: none"> 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 <p>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.</p>

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

Notification is required if a pollution incident causes or threatens to cause ‘*material harm to the environment*’.

¹ The POEO Act provides definitions for each of these types of pollution.

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2. Premises Details

2.1 SITE OVERVIEW

Biodiesel Industries Australia (BIA) is a Bloomfield owned company specialising in the manufacture of biodiesel. Located in Maitland NSW, BIA has been in operation since 2003 with capacity to produce up to 20 million litres per annum. BIA has a reputation for producing high quality product compliant with the Australian Fuel Quality Standard. The production facility is based at 62 Racecourse Road Rutherford, New South Wales (NSW) (Refer to Figure 1).

Biodiesel Industries Australia is located in an light industrial subdivision in the NSW suburb of Rutherford in the City of Maitland in the Hunter Region of NSW. The suburb consists of mixed residential development, bulky goods retail, light industry, and manufacturing plants. The site is located within a light industrial subdivision, neighbouring properties include a smash repairer, stock feed merchant, industrial safety and mining suppliers and other mixed light manufacturing businesses.

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Figure 1: Regional Locality Map

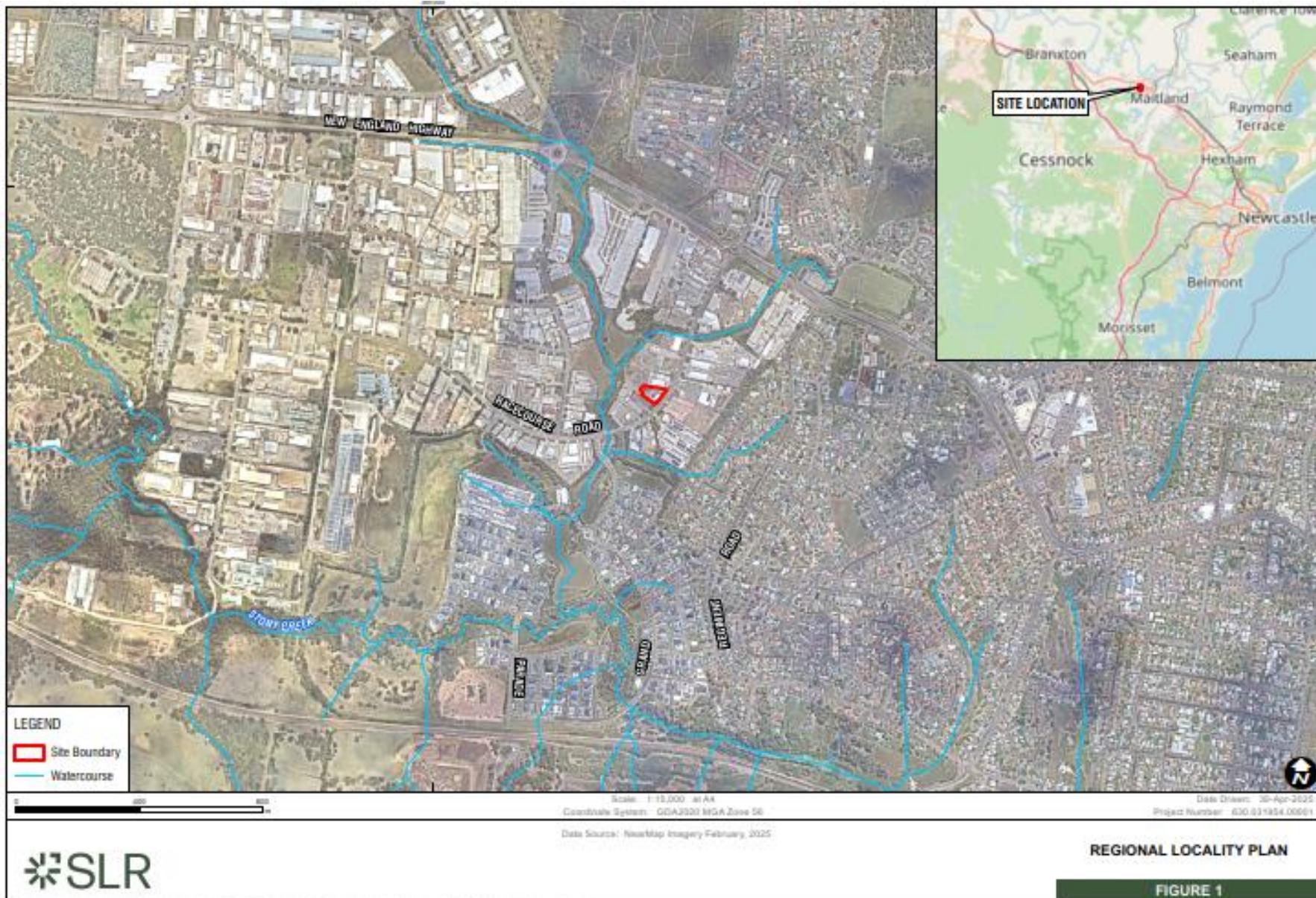
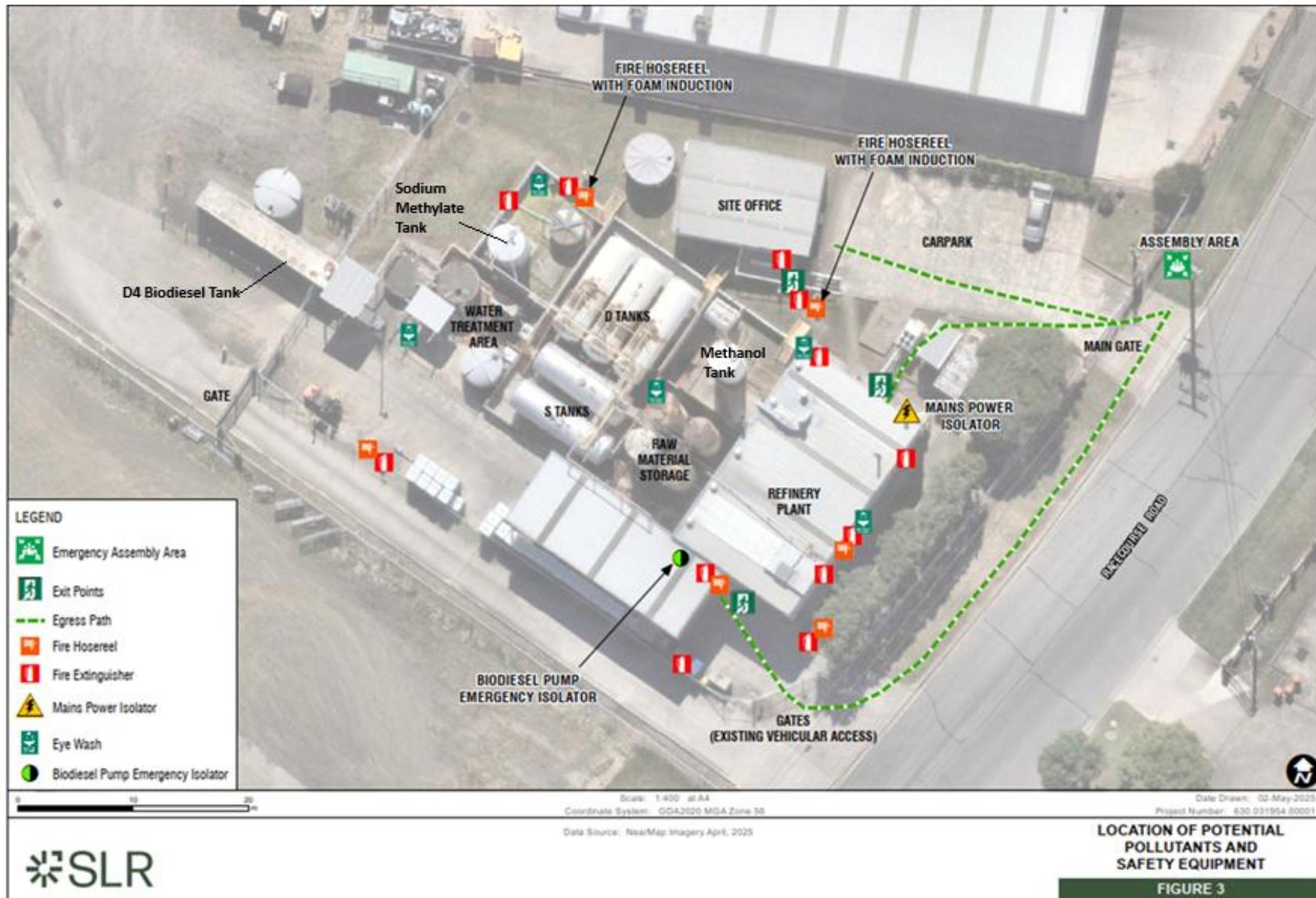


Figure 2: Site Location, Surrounding Watercourses and Businesses



Figure 3:

Potential Pollutants, Safety Equipment and Evacuation Points



3. Management and Responsibilities

3.1 DUTY TO NOTIFY

Section 148 of the *POEO Act* requires that the “Relevant Authority” is notified “*where a pollution incident occurs in the course of an activity*” where “*material harm to the environment is caused or threatened*”

Employees and contractors working at BIA are responsible for alerting Site Management to all environmental incidents or hazards, regardless of the nature or scale of the observed incident or event.

With regards to activities that cause, or threaten, a significant environmental incident, BIA 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, notify their relevant manager of the incident and all relevant information about it.

The required information includes:

- a. exact location of incident.
- b. date, time, and nature of incident.
- c. extent of incident.
- d. actions taken.
- e. whether emergency services are required or have been contacted.

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

An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware) of a pollution incident, must undertake notification to the appropriate regulatory authority of any “material harm incidents”, including relevant information.

Refer to Section 4.1 Contact Information and Reporting and Notification Protocol for contact details and protocols related to reporting to the “Authorities”.

3.2 SITE MANAGEMENT

If an incident constitutes material harm to the environment, as defined in Section 1.3, the RCM Site Management listed in Table 3-1 will implement the PIRMP immediately.

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Table 3-1: BIA Site Management (Authorised Persons)

Person	Contact Information	Responsibility
Director - BIA	Brett Lewis Ph: 0409 494 366	<ul style="list-style-type: none"> Provide adequate financial resources, qualified personnel, and training to ensure implementation of environmental management plans.
Director - BIA	Norah St George Ph: 0439 642 297	<ul style="list-style-type: none"> Overall business management. Assisting in communication with relevant authorities, communities, and staff.
Business Manager - BIA	Aaron Holmquest Ph: 0439 805 756	<ul style="list-style-type: none"> Determination of material harm incident.
Production Supervisor – Biodiesel Industries Australia	Steven Yates Ph: 0429 328 565	<ul style="list-style-type: none"> Activation of PIRMP. Managing activation & implementation of response to Environmental Incident. Ensuring all staff and contractors on site are aware of the PIRMP and adequately trained in its procedures.
Group Manager Environment (Bloomfield Group)	Name: Chris Knight Ph: 0403 058 777	<ul style="list-style-type: none"> Notification of Authorities. Notification of Neighbouring Properties. Prepare compliance reports in conjunction with 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 on site are aware of the PIRMP and adequately trained in its procedures.

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

- Activating the PIRMP.
- Notifying relevant authorities.
- Managing the response to a pollution event.

If an actual or potential incident that threatens or causes material harm, BIA Site Management will immediately initiate the PIRMP (refer to Section **Error! Reference source not found.** for Incident Notification and Response actions).

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3.3 GENERAL ROLES AND RESPONSIBILITIES

Table 3-2 lists general roles (positions) within the organization and their broader responsibilities related to the PIRMP.

Table 3-2: General Roles and Responsibilities

Role	Responsibilities
Business Manager	<ul style="list-style-type: none"> Overall responsibility for environmental management and compliance with EPL Conditions and relevant legislation. Oversee the implementation of this PIRMP and ensure adequate resources to enable implementation.
All employees and contractors	<ul style="list-style-type: none"> Ensure familiarity, implementation, and compliance with this plan. Support commitments to site environmental management and compliance. Work in a manner that will not harm the environment or others. Report all environmental incidents, complaints, or inappropriate practices to the Site Manager.

3.4 HAZARDOUS SUBSTANCES

A summary of hazardous substances and pollutants received, stored and/or created at the licensed site are listed in Table 3-3. Safety Data Sheets (SDS) for each of the materials stored on site are to be available where the product is stored and within the PIRMP records.

The table below details the type, maximum volume and location of potential pollutants stored at the licenced premises. The classifications are those defined in AS1940:2017.

Table 3-3: Inventory of Potential Pollutants

Potential Pollutant	Maximum Volume	Location
Combustible Liquids Class 2 (Biodiesel)	52,000 L	D1 – Above Ground Tank
Combustible Liquids Class 2 (Biodiesel)	52,000 L	D2 – Above Ground Tank
Combustible Liquids Class 2 (Biodiesel)	52,000 L	D3 – Above Ground Tank
Combustible Liquids Class 2 (Biodiesel)	52,000 L	S1 – Above Ground Tank
Combustible Liquids Class 2 (Biodiesel)	52,000 L	S2 – Above Ground Tank
Sodium Methylate Solution Class 3	42,000 L	Me1 – Above-Ground Tank
Combustible Liquids Class 2 (Biodiesel)	75,000 L	D4 – Above Ground Self Bunded Tank
Methanol Class 3 Flammable Liquid	52,000 L	Tk1 – Above Ground Tank
Acetic Acid Class 8 Corrosive	1,000 L	Store 1 – Roofed Store
Phosphoric Acid Class 8 Corrosive	1,000 L	Store 1 – Roofed Store

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3.5 POTENTIAL HAZARDS

This section addresses the requirements of Clauses 72 of the Protection of the Environment Operations (General) Regulation (POEO(G) Regulation) 2022. Table 3-4 provides a summary of potential hazards identified at BIA. It includes details on conditions or events that could increase the likelihood of these hazards occurring.

Potential environmental incidents related to BIA Operations have been identified through an Environmental Risk Assessment conducted according to methodology consistent with Australian Standard (*AS/NZS ISO 31000:2018 Risk Management – Principles and Guidelines*). The *Broad Brush Risk Assessment for BIA* provides a summary of the environmental hazards identified through the risk assessment process, as being of significance to the Operations and therefore as requiring a response under Environmental Protection Authority (EPA) required Pollution Incident Response Management Plans, is presented in Table 3-4 below.

The purpose of this risk assessment was to identify the potential major hazards and/or risk(s) posed by the operation, 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 minimizing potential environmental impacts and ensuring the safety of all stakeholders.

The *Broad Brush Risk Assessment for BIA* identified no Extreme or High rated environmental hazards at BIA Operations.

The following hazards were identified as having the greatest potential to cause “material harm” to the environment and therefore are required to be addressed in the PIRMP.

Table 3-4: Hazard Likelihood

Operation	Risk Category	Potential Hazard	Likelihood of Occurrence	Events that could increase likelihood
Unloading / Loading	Spill	Release of Chemical or hydrocarbon during delivery/unloading	Significant (Moderate/Possible)	Accidents
Chemical/Hydrocarbon Storage	Ignition	Ignition of Methanol or Sodium Methylate Solution	Significant (Major/ Remote)	Poor storage management
Chemical/Hydrocarbon Storage	Fire or explosion	Fire or explosion	Significant (Major/ Remote)	Poor storage management
Processing/Treatment (Dosing Methanol and methylate)	Fire or explosion	Fire or explosion	Significant (Major/ Remote)	Improper handling, storage, or transport of dangerous goods. Contact with water.

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3.6 PRE-EMPTIVE ACTIONS

Pre-emptive actions 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 included in Sections 4.2 for each potential incident.

3.7 SAFETY EQUIPMENT

A range of safety equipment is available at the Site to minimise health and safety risks during operations and in response to incidents. The inventory of safety equipment, along with their descriptions, locations, and maintenance schedules, is detailed in Table 3-5.

Table 3-5: Inventory of Safety Equipment

Equipment or Resource	Location	Maintenance Responsibility
Spill kit	Factory	Production Supervisor
205L drums	Water Treatment Area	Production Supervisor
Camera and sampling equipment	Site laboratory	Production Supervisor
Portable pump	Factory	Production Supervisor
SDS Register	Office and Factory	Production Supervisor
Fire fighting equipment (Fire extinguishers, fire hose reels and foam applicators)	See attached Map	Production Supervisor
Nitrogen Blanket	See attached Map	Production Supervisor

Error! Reference source not found. indicates the location of any stormwater drains on the premises. Safety equipment is checked/serviced routinely and immediately after use. For the specific locations of fire safety and first aid equipment within the complex, refer to **Error! Reference source not found.**

3.8 EMERGENCY PLAN

An Emergency Plan has been prepared and is communicated and made available to all personnel entering the premises. This Emergency Plan is based on recognised emergency management and risk management principles that comply with the relevant mine safety regulations and standards.

This PIRMP forms part of an integrated response in the event of an emergency at the facility. The PIRMP and Emergency Plan will be initiated concurrently in response to fire, explosions, medical emergencies, rescue, incidents with hazardous chemicals, bomb threats, armed confrontations, and natural disasters.

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4. Incident Management

4.1 IMMEDIATE NOTIFICATION

If an actual or potential incident that threatens to cause, or causes material harm, BIA Management will immediately initiate the PIRMP.

If there is an immediate threat to life or property:

- An emergency will be declared.
- Fire and Rescue (000) will be contacted first.
- Emergency Plan will be enacted.
- Fire and Emergency Evacuation Diagram will be enacted (**Error! Reference source not found.**).

Table 4-1 lists the contact details for the appropriate regulatory authorities (ARA's) that will be notified in the event of a pollution incident at the site. BIA Management will provide the following information to agencies:

- a. Exact location of incident.
- b. Date, time, and nature of incident.
- c. Extent of incident.
- d. Actions taken.
- e. What emergency services are required or have been contacted.

Table 4-1: *Regulatory Authorities Contact Details*

Relevant Authority	Key Contact	Notification Process
NSW Police Fire and Rescue NSW NSW Ambulance	000 or 1300 729 579	To be contacted first if the incident presents an immediate threat to human health or property and emergency services are required.
NSW Environment Protection Authority (EPA) Pollution line	131 555 info@environment.nsw.gov.au	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.
NSW Health (Public Health Unit – Newcastle)	Office (02) 4924 6477 Fax 02 49246490	Ask for Public Health Officer on call (Open 24 hours). Provide EPA event record ID if requested.
NSW Health	(02) 9391 9000	Local public health unit
Safe Work NSW	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.

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Relevant Authority	Key Contact	Notification Process
State Emergency Services	(02) 6572 4669 or 132500	For emergency help in floods, storms and tsunami call NSW SES at any time on 132 500 In a life-threatening emergency call 000 (triple zero).
Local Government – Maitland	(02) 4934 9700	24 hrs, 7 days a week

4.2 ACTIONS DURING A POLLUTION INCIDENT

During a pollution incident, BIA will respond promptly to prevent or reduce any adverse environmental impact. Actions taken during Pollution Events will be completed in accordance with the Site Emergency Plan and generally involve:

- Where possible and safe to do so, immediate action should be taken to prevent, stop, contain and/or minimise the environmental impact of the incident.
- Undertake notification procedure.
- Undertake investigation into the cause of the incident, gathering information and photos.
- Assess need for additional (response) controls and remedial works.
- Review information from investigation and identify ongoing actions.
- Ongoing consultation with agencies or stakeholders.

It is imperative that an honest assessment of the situation is carried out and documented to minimise the potential for similar events in the future. On this basis, every environmental incident is to be recorded on the Environmental Incident Report Form. A copy of the completed form should be sent to the contacted authorities and be maintained for at least four years.

4.2.1 General Incident Management Response

As well as following the specific actions detailed for each environmental incident below, the following general actions should be followed for all environmental incidents:

- Report the incident to Supervisor, Operations Manager and Environmental Superintendent. At a minimum, the reported information should include:
 - Nature of the Incident;
 - Location of the Incident;
 - Assistance required (e.g. spill kit, machinery).

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- Assess the scale of the incident and incident site, identifying potential hazards to human safety, and take appropriate actions to maintain human safety.
- Where possible, and safe, implement the 3 Cs Incident Response – Control, Contain, Clean-up:
 - Control the source of the pollution incident, and control access to the impacted area;
 - Contain the released pollutant from spreading any further; and
 - Clean up the already released pollutant (and dispose of legally).

Depending on the scale of the incident, the 3Cs response may be achievable locally utilising Site based resources, but may also require the use of specialised contractors.

4.2.2 Release of Chemical / Hydrocarbon During Transport

Feedstock (i.e. recycled cooking oil or canola oil) and process chemicals are delivered to BIA and unloaded at the loading bay. Feedstock and process chemicals may be delivered in bulk, by tanker, or in containerised form (most commonly 205L drums or 1,000L IBC). Feedstock and glycerin are also loaded from this bay and may be transported in bulk, by tanker, or in containerised form.

The loading bay is purpose designed and bund protected to control the accidental release of liquids while loading/unloading. The nearest sensitive receptor is a creek located approximately 100m west of the BIA site.

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Table 4-2: *Incident Management Release of Chemical / Hydrocarbon During Transport*

Incident Management	Responsible Person
Preventative Actions	
<p>The loading bay is purpose designed for the loading and unloading of goods, including:</p> <ul style="list-style-type: none"> • Drive-in/drive-out bund protection • Under-cover location to prevent ingress of rainwater • Drainage collection sumps to capture any released liquids • Secure hose fittings for unloading from bulk containers • Tanks are located and designed in accordance with AS1940:2004 The storage and handling of flammable and combustible liquids • Bund protected storage for temporary storage of containerised materials • Dangerous goods tanks have interlocked valving to prevent accidental mixing of products • Level indicators on storage tanks • Spill kits are located onsite 	Business Manager
<p>Trained and experienced operators are employed to ensure the loading/unloading of goods are carried out in a manner that avoids the spillage. Including the:</p> <ul style="list-style-type: none"> • Appropriate Work Instructions. • Trained and experienced operators. • Goods are delivered to site in enclosed containers or sealed bulk tankers. 	Business Manager
Response Actions	
Report incident	See section 4.1
Assess the situation to identify & where possible, isolate human safety or health hazards as per the Risk Management System.	Production Supervisor
Employ the 3C's spill response procedure (see General response section) to contain and recover any released feedstock product. Where possible, prevent released feedstock from leaving the bunded unload bay, and from leaving site.	Production Supervisor, Operators
Depending on the scale of the release, clean-up may be achievable with absorbent and containment products in the site spill kits, or may require the use of a portable pump, vacuum truck, or other specialised contractors.	Production Supervisor, Operators
Ensure all released liquid, including contaminated absorbent products is recovered and disposed of via licenced waste contractors.	Production Supervisor
Inspect the function and integrity of unloading facilities and containment measures before re-commencing unloading.	Production Supervisor
Group Incident Investigation Procedures	Business Manager

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4.2.3 Fire or Explosion

Combustible liquids are stored onsite. Although unlikely, the potential does exist for this product to catch fire or, in extreme cases, explode. Such an incident may cause harm to human health, or the environment, through airborne emissions or damage to facilities, resulting in the release of hydrocarbons to the environment.

Table 4-3: *Incident Management Fire or Explosion*

Incident Management	Responsible Person
Preventative Actions	
Appropriate fire prevention incorporated into site design, including: <ul style="list-style-type: none"> Storage facilities designed and constructed in accordance with AS1940:2004 The storage and handling of flammable and combustible liquids. Fire extinguishers, fire hose reels (including those with foam applicators) and nitrogen blanket. 	Business Manager
All biodiesel storage and handling facilities are subject to a periodic inspection program and, where required, appropriate maintenance or upgrades.	Business Manager
Appropriately trained and experienced employees operating onsite facilities and equipment.	Business Manager
Emergency response procedures, including periodic testing and evacuation drills.	Business Manager
Hot work procedures, and completion of risk assessments, to control potential ignition sources.	Business Manager
Response Actions	
Report incident	See section 4.1
Assess the site to identify and, where possible, isolate hazards to human safety or health, including potential traffic hazards. Render first aid, if required.	Production Supervisor
If safe to do so, attempt to extinguish the fire using onsite fire extinguishers, fire hoses or nitrogen blanket.	All trained workers
If required, evacuate workers from the site, and neighbouring properties; ensuring the site is appropriately secured to prevent accidental access.	Production Supervisor
If combustible liquid has been released, employ the 3C's spill response procedure (see General response section) to contain and recover any released feedstock product.	Production Supervisor, Operators
Ensure all released combustible liquids, including contaminated absorbent products, are recovered and disposed of via licenced waste contractors.	Production Supervisor
Inspect the function and integrity of biodiesel storage facilities equipment before re-use.	Production Supervisor
• <i>Group Incident Investigation Procedures</i>	Business Manager

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4.2.4 Ignition of Methanol or Sodium Methylate Solution

BIA stores Methanol and Sodium Methylate onsite (see Table 3) for use in the biodiesel refining process. As for the biodiesel storage, the remote potential does exist for these products to catch fire.

As Methanol and Sodium Methylate are considerably more volatile than biodiesel, they represent a greater explosion hazard. Such an incident may cause harm to human health, or the environment, through airborne emissions or damage to facilities resulting in release of hydrocarbons or chemicals to the environment.

Table 4-4: *Incident Management Ignition of Methanol or Sodium Methylate Solution*

Incident Management	Responsible Person
Preventative Actions	
Appropriate fire prevention incorporated into site design, including: <ul style="list-style-type: none"> Storage facilities designed and constructed in accordance with AS1940:2004 The storage and handling of flammable and combustible liquids. Spark-proof tank ventilation Electrical earthing Fire extinguishers, fire hoses (with foam applicators) and nitrogen blanket 	Business Manager
All chemical and hydrocarbon storage and handling facilities are subject to a periodic inspection program and, where required, appropriate maintenance or upgrades.	Business Manager
Appropriately trained and experienced employees operating onsite facilities and equipment.	Business Manager
Emergency response procedures, including periodic testing and evacuation drills.	Business Manager
Hot work procedures, and completion of risk assessments, to control potential ignition sources.	Business Manager
Response Actions	
Report incident	See section 4.1
Assess the site to identify and, where possible, isolate hazards to human safety or health, including potential traffic hazards. Render first aid, if required.	Production Supervisor
If safe to do so, attempt to extinguish the fire using onsite fire extinguishers, fire hoses or nitrogen blanket.	All trained workers
If required, evacuate workers from the site, and neighbouring properties ensuring the site is appropriately secured to prevent accidental access.	Production Supervisor
If hydrocarbons or chemicals have been released, employ the 3C's spill response procedure (see General response section) to contain and recover any released product.	Production Supervisor, Operators
Ensure all released chemicals or hydrocarbons, including contaminated absorbent products, are recovered and disposed of via licenced waste contractors.	Production Supervisor
Inspect the function and integrity of storage facilities equipment before re use.	Production Supervisor
<i>Group Incident Investigation Procedures</i>	Business Manager

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4.3 MINIMISING HARM

All staff and contractors must complete an induction and training before working on-site. The induction covers procedures for preventing pollution incidents, notification processes, incident management, and post-incident actions. Training records are kept on-site.

During a pollution incident, minimising harm to persons on-site is the top priority. If evacuation is necessary, actions will follow the Emergency Plan and the Fire and Emergency Evacuation Diagram ([Error! Reference source not found.](#)). In the event of an evacuation:

- The Site Manager contacts emergency services if needed.
- The Site Manager (or their nominee) coordinates with emergency services.
- Employees stop work immediately and move to the nearest emergency assembly area, staying there until instructed otherwise.
- The Site Manager conducts a roll call.
- Employees return to work only after the Site Manager gives the all-clear.

Staff are informed of Emergency Assembly Areas through inductions, signage, and ongoing training. Key aspects of the PIRMP will be shared with staff and contractors. The PIRMP will be tested annually, as detailed in Section [Error! Reference source not found.](#).

4.4 COMMUNITY COMMUNICATION

In the event of a pollution incident, BIA has established the following processes for contacting the local community:

4.4.1 Consultation with Regulatory Authorities

- Site Manager will consult with regulatory authorities to determine if the community should be notified.
- The most appropriate communication strategy will be discussed with the authorities (e.g., media release, direct contact with potentially impacted individuals).

4.4.2 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.

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4.4.3 Identified Properties

- Nearby receptors have been identified as potentially affected in the event of an environmental incident. These receptors and their contact information are provided in
- Table 4-5.

Table 4-5: Contact Details of Nearby Properties

Name	Address	Contact
Furneys Stock Feed	78 Racecourse Rd, Rutherford	(02) 4932 4455
Maitland Smash Repairs	56 Racecourse Rd, Rutherford	(02) 4932 8340
Sicada Fire & Safety	1/71 Racecourse Rd, Rutherford	(02) 4937 6310
AWD Lifts & Transport	80 Racecourse Rd, Rutherford	0407 385 521
Wax Converters	77 Racecourse Rd, Rutherford	(02) 4932 6338

4.4.4 Actions During and Following a Pollution Incident

- **Notification of Neighbouring Properties:** Based on risk, considering the materiality of the event, incident type, and prevailing conditions, Site Manager will determine if and how to notify neighbouring properties.

4.4.5 Notification Methodology

- **Immediate Contact:** Neighbours at risk of downstream or flow-on impacts will be contacted immediately during an incident.
- **Early Warnings:** Same-day telephone notifications will be given to landholders who may be affected within the next 24 hours.
- **Updates:** Follow-up phone calls will be made to all landholders who received initial early warnings.

4.4.6 Broad Community Updates

- Updates will be provided to the broader local community in affected areas via information sheets or newsletters, the BIA website, media statements, or other appropriate strategies.
- Information provided will include:
 - Type of incident.
 - Type of pollutant.

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- Prevailing winds.
- Magnitude of the emission.
- Likelihood of the pollutant reaching ground level.
- Potential impacts on sensitive receptors, local landholders, and the community.
- Site contact details.
- Advice or recommendations based on the incident type and scale.

4.5 ACTIONS FOLLOWING A POLLUTION INCIDENT

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

A detailed incident report will be sent to the EPA and relevant agencies², within 7 days³ of the incident, which outlines the following:

- date, time, and nature of the pollution incident.
- identifying 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.

BIA will also participate in any external investigation processes, if required.

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

All staff and contractors will receive the necessary refresher training and the key outcomes of the incident investigation will be reported to staff and contractors

² Other Government Agencies may also require this report (Maitland Council)

³ Aligned to EPL 12627, condition R2.2

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5. Training, Testing and Communication

5.1 TRAINING

All staff and employees will be trained on the contents, process, and requirements of the PIRMP. The objective of this training is to inform employees of the PIRMP and ensure all staff and contractors are aware of the key steps required to respond to and manage a pollution incident. As a minimum, the following will be undertaken:

- Staff and Employees will be informed of the PIRMP, its role and its function within site inductions.
- Specific training will be provided to key personal, detailing methods of incident notification and response as well as responsibilities under the PIRMP.

Training will be delivered through one or more of ways (inductions, toolbox talks, formal site training, exercises).

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

- Pollution Incident.
- PIRMP Tests.
- PIRMP Updates / Revisions.

Training in the procedures contained in this document will be implemented as per the schedule presented below in Table 5-1.

Coordination of the training program is the responsibility of the site Environmental staff and recorded through the Group Training and Competency Management System.

Table 5-1: Training Schedule

Role	Format	Frequency
Business Manager	Formal training & assessment/ participation in annual testing	Annual
Production Supervisors	Formal training & assessment/ participation in annual testing	Annual
Operators and Office Staff	Formal training & assessment/ participation in annual testing	Annual

5.2 TESTING

The Business Manager will coordinate PIRMP testing to ensure the plan's accuracy, currency, and effective implementation. Routine testing will be conducted annually or within 30 days of any pollution incident and can be carried out through the following methods:

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- Incident response.
- Simulated environmental emergency.
- Desktop simulations.

Records of the testing dates and the names of the staff members conducting the tests will be maintained.

The information and actions contained in this document are tested annually to ensure the document remains accurate, relevant and practicable. Testing will alternate between desktop simulation and practical response exercise in alternate years. Where necessary Fire and Rescue NSW can be invited to participate and observe the testing of the PIRMP.

Testing will also take place within a reasonable period of time of an actual Environmental Incident occurring, to ensure the procedures are adequate and up-to-date.

Testing, whether desktop simulation or practical exercise, will assess all aspects of the procedures contained in this document.

Following completion of testing, whether annual or incident related⁴, observations and outcomes of the testing will be recorded and used to update this document, as required.

The Business Manager coordinates the annual test, and maintains any records generated during testing. At a minimum, records must include date of testing, and the names of the person conducting the testing.

The test and revision register can be found in **Appendix A**.

5.3 REVIEW

Reviews will be undertaken regularly to ensure the PIRMP is current and fit for purpose. Reviews will be coordinated by the Site Manager with the following objectives:

- Identify and consider changes to site (infrastructure, processes, practices).
- Identify and consider changes to the strategic and statutory context (DPHI Guidance).
- Identify and consider changes to ownership / development status of neighbouring properties.

⁴ Note: Activation of the PIRMP in response to a pollution incident is not considered a test of the PIRMP

Testing may take the form of a post-incident debrief. The results of all testing of the PIRMP should be recorded.

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- Identify and consider opportunities for improvement in the Plan.

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

5.3.1 Event Based

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

- Activating the PIRMP (within 30 days).
- Completing PIRMP Testing (within 30 days).
- Change of operations including significant increase of production capacity, significant new plant and equipment is installed or upgraded and when the layout of the site is changed (e.g., relocation of a chemical storage area), requiring a new risk assessment (prior to operation of the change).
- Modification/Improvement to site processes (prior to operation of the change).

5.3.2 Time-Based

As a minimum, the PIRMP will be reviewed every 12 months and recorded in the Test Register, located in **Appendix A**.

5.3.3 PIRMP Revisions

Where PIRMP Reviews identify elements that require the PIRMP to be updated, revisions will be undertaken within 30 days of completing the review. The version number and date of the PIRMP is to be updated within the revision record and documented within the Test Register.

5.4 AVAILABILITY OF THE PIRMP

Copies of this document are managed under the Document Management System.

A copy of this PIRMP will be kept in written form at the site and will be made readily available to all personnel responsible for implementing the PIRMP and to any authorised officer (as defined in the POEO Act), upon request.

The PIRMP will be made available to the public⁵ via <https://www.bloomcoll.com.au/sustainability/environmental-management/biodiesel-industries-australia> within 14 days of endorsement by the Business Manager.

⁵ Note: Personal information as defined in the Privacy and Personal Information Protection Act 1998 will not to be made publicly available.

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In accordance with Section 74 of the POEO (G) Regulation the following information is available on The Bloomfield Group website on the Biodiesel Industries Australia page:

- The procedures for contacting the relevant authorities including the EPA, local Council, NSW Health, WorkCover NSW, and Fire and Rescue NSW; and
- The procedures for communicating with the community as described in Section 4.4.

A hardcopy of this document is maintained onsite, and made available to authorised EPA Officers, if requested. The hardcopy of this document will be found at the Main Office.

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6. References

Protection of the Environment Operations Act 1997

Protection of the Environment Operations (General) Regulation 2009

EPA Environmental guidelines - Preparation of Pollution Incident Response Management Plans

AS31000:2009 Risk Management – Principles and Guidelines

Biodiesel Environmental Emergencies Risk Assessment Report 070812

Biodiesel Emergency Response Procedure

Group Incident Investigation Procedures

AS1940:2004 The storage and handling of flammable and combustible liquids

Document and Records Management System

Internal Audit Management System

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7. Acronyms and Abbreviations

DA	Development Application
DPHI	Department of Planning, Housing and Infrastructure
BIA	Biodiesel Industries Australia
EPA	Environment Protection Authority
EPL	Environment Protection Licence
LGA	Local Government Area
MSDS	Material Safety Data Sheet
NSW	New South Wales
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
DA	Development Application
DPHI	Department of Planning, Housing and Infrastructure

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Appendix A Test and Revision Register Template

Test Register

Revision	Details of Test / Review	Date Tested	By	Checked By	Approved By
18	Update PIRMP to new guideline	20/03/2025	Chris Knight, Erin Penglaze, Nicole Campbell, Aaron Holmquest		
17	Test and Review	20/08/2024	Chris Knight, Liam Merrigan, Steve Yates, Nicole Lee, Aaron Holmquest		
16	Test and Review	07/09/2023	Chris Knight, Liam Merrigan, Steve Yates, Nicole Lee, Aaron Holmquest		
15	Update Testing procedure	13/05/2022	IB	AH	IB
14	Review	05/09/2022	SF	IB	SF
13	Reviewed and Updated	23/12/2021	IB	IB	AH
12	Reviewed and Updated	12/08/2021	IB	IB	AH
11	Reviewed and Updated	16/02/2021	KS	KS	I.B.
10	Review	11/12/2020	AH	KS	AH
9	Review	06/05/2020	AH	KS	AH
8	Review	11/12/2019	AH	KS	AH
7	Review	12/12/2018	JH	KS	AH
6	Review	10/11/2017	JH	KS	AH
5	Revision (inclusion of new notification number for Fire and Rescue)	22/02/2017	MG	AH	AH
4	Approved version	08/10/2012	MG	AH	AH
3	Final draft	28/09/2012	MG	KS	
2	Revision (tidy up details)	04/09/2012	MG	DF	
1	Original Draft	24/08/2012	MG	LC	