

Pollution Incident Response Management Plan

Luddenham Operations Pty Ltd

Luddenham Quarry

275 Adams Road, Luddenham NSW 2745

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
ENVIRONMENTAL PROTECTION LICENCE (EPL) NUMBER: 21562

Approved by: Harry Scarlis

Position/Title: Director

Signature: 

Date: 24/09/2025

PURPOSE:

Luddenham Operations Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Luddenham Quarry at 275 Adams Road, Luddenham. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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

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

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licencees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

Environment Protection Licence (EPL) Details

Name of licensee: Luddenham Operations Pty Ltd (ABN 40 643 874 211)
(including ABN)

EPL number: 21562

Premises name and address: Luddenham Quarry
275 Adams Road
Luddenham NSW 2745

Company or business contact details
Name: Harry Scarlis
Position or title: Director
Business hours contact number/s: 02 7207 9059
After hours contact number/s: 02 7207 9059
Email: info@luddenhamquarry.com.au

Website address: www.luddenhamquarry.com.au

Scheduled activity/activities on EPL:

- Crushing, grinding or separating;
- Extractive activities; and
- Mining for minerals.

Fee-based activity/activities on EPL:

- Crushing, grinding or separating;
- Extractive activities; and
- Mining for minerals.

Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

PIRMP activation
Name of person responsible: Youssef Asskro
Position or title: Site Supervisor
Business hours contact number/s: 0484 111 875
After hours contact number/s: 0484 111 875

Alternative contact:
Name of person responsible: Geoffrey Goodwin
Position or title: Site Supervisor
Business hours contact number/s: 0449 773 441
After hours contact number/s: 0449 773 441
Email: shanewhs@mulgoaq.com.au

Pollution incident – person/s responsible, continued

Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

Name of person responsible: Youssef Asskro
Position or title: Site Supervisor
Business hours contact number/s: 0484 111 875
After hours contact number/s: 0484 111 875

Managing response to pollution incident

Name of person responsible: Youssef Asskro
Position or title: Site Supervisor
Business hours contact number/s: 0484 111 875
After hours contact number/s: 0484 111 875

Notification of relevant authorities

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

Relevant authorities include:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
 2. EPA – 131 555
 3. NSW Health (nearest public health unit)
- See www.health.nsw.gov.au/Infectious/Pages/phus.aspx for local contact details.
4. SafeWork NSW – 131 050
 5. Local authority (usually the local council) in which the pollution has occurred.

Note: The local council and public health unit will vary depending on the location of the pollution incident. For mobile plant licences the PIRMP will need to include the person or people who are responsible for identifying the local authority and nearest public health unit.

Fire & Rescue NSW / Rural Fire Service (Liverpool Office)

Contact number/s:

000 / 02 9603 7077

EPA	Contact number/s:	131 555
NSW Health	Relevant Area Health Service:	Liverpool PHU
	Contact number/s:	02 9794 0855
SafeWork NSW	Contact number/s:	131 050

Notification of relevant authorities, continued

Local authority/s

Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area, is affected, or potentially affected, by the pollution.

Contact number/s:

Liverpool City Council

1300 362 170

Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Planning Industry and Environment, Roads and Maritime Services

Contact number/s:

Water NSW

1300 662 077

RMS

13 77 88

DPIE

1300 305 695

Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

Direct neighbours to the Premises are:

Western Sydney Airport

285 Adams Road, Luddenham

225 Adams Road, Luddenham

Hubertus Club, 205 Adams Rd, Luddenham

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):

Neighbours to be identified by phone call to the following contact numbers:

- Western Sydney Airport – 1800 972 972

- 285 Adams Road, Luddenham – 0418 675 532 (Tony)
- 225 Adams Road, Luddenham – 0433 583 345 (Ammar)
- Hubertus Club (C1/AR1), 205 Adams Rd, Luddenham – (02) 4773 4444

Description and likelihood of hazards

The following risk matrix is to be applied when considering the types and likelihood of hazards:

Likelihood	RISK SCORE CALCULATOR	Consequence					Consequence / Impact	Description of Consequence / Impact	Risk Class
		Significant	Major	Moderate	Minor	Insignificant			
Very Likely		1	1	1	2	2	Potential Death, Permanent Disability, or Major Structural Damage. Off-site release not contained, major remediation required with outside assistance, significant detrimental environmental impact.	1	
Likely		1	1	2	2	2	Potential temporary disability/ serious injury or Minor Structural Damage. On site release contained, minor remediation required with outside assistance; short-term detrimental environmental impacts.	2	
Possible		1	2	2	2	3	Potential incident that may cause persons to require first aid. On-site release immediately contained; minor level <u>clean</u> up with no short-term environmental impacts.	3	
Remotely Possible		2	2	2	3	3			
Very Unlikely		2	2	3	3	3			

Item	Description	Likelihood / Consequence / Risk Class	Contributing Circumstances
1	<p><u>Liquid Spill:</u> This could include:</p> <ul style="list-style-type: none"> - Diesel spill from the onsite diesel tank, the diesel tanks on mobile plant and equipment or diesel tanks from vehicles transporting material from site; - Liquid/oil spill from stored machine/hydraulic oils onsite; <p>Any potential spills would need to be immediately and effectively contained on the premises to avoid contamination.</p>	2 / 3 / 3	<p>Contributing circumstances could include:</p> <ul style="list-style-type: none"> - Self-bunded diesel tank being compromised; - Incorrect storage of oils onsite; - Piercing diesel tanks on mobile plant and equipment/other vehicles onsite.
2	<p><u>Stormwater Pollution into Oaky Creek:</u> There is potential for stormwater runoff to be sediment laden and pollute surrounding waterway.</p>	3 / 3 / 3	<p>Contributing circumstances could include internal roads / stormwater systems not being adequately maintained causing runoff.</p>
3	<p><u>Fire:</u> There is potential for mobile plant and equipment to catch fire in some circumstances.</p>	3 / 1 / 2	<p>Contributing circumstances could include:</p> <ul style="list-style-type: none"> - Plant and equipment not being appropriately/adequately maintained; - Heat/dry weather conditions; and - High winds.
4	<p><u>Dust Pollution:</u> There is the potential for dust to be generated from onsite activities and the potential for this dust to migrate offsite. These activities include excavating, processing and loading extracted materials from site.</p>	3 / 2 / 2	<p>Contributing circumstances could include:</p> <ul style="list-style-type: none"> - Heat/dry weather conditions; - High winds; and - Complacency with respect to adhering to the onsite dust management protocols.
5	<p><u>Noise Pollution:</u> Noise will be generated from onsite activities and there is the potential for elevated noise levels to be experienced at residences.</p>	1 / 2 / 3	<p>Contributing circumstances could include:</p> <ul style="list-style-type: none"> - Plant and equipment not being appropriately/adequately maintained; and - Source to receiver winds.

Pre-emptive actions to be taken

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

Item	Description	Pre-emptive Actions
1	Liquid Spill	<ul style="list-style-type: none"> - Ensure diesel tank self-bundling integrity is not compromised via regular inspection and assessment; - Ensure oils are correctly and safely stored onsite, as well as ensuring those oils are used safely and responsibly; - Mobile plant and equipment to be regularly serviced in accordance with the manufacturer's recommendations in order to minimise the likelihood of oil/diesel leaks and spills; - Ensure employees are trained and monitored when re-fuelling machines and filling up machine oils; and - In the case of a spill, ensure spill kits are always available onsite and ensure their whereabouts is known to allow for immediate deployment if needed.
2	Stormwater Pollution	<ul style="list-style-type: none"> - Ensure internal roads and stormwater systems are regularly maintained and in good working order and condition.
3	Fire	<ul style="list-style-type: none"> - Ensure onsite hoses are in good working condition; - Ensure onsite fire extinguishers are tested and in correct working order; - Undertake regular fire drills; - Ensure there is no risk of water run-off where large volumes of water are used to extinguish a fire; - Ensure emergency services vehicles would have clear passage to the site at all times if needed; and - Exercise additional precautions taken/awareness during hot/dry/windy weather conditions.
4	Dust Pollution	<ul style="list-style-type: none"> - Ensure strict adherence to the onsite Dust Management Plan; - Implement the use of onsite handheld hoses and fixed misting sprays appropriately and as needed; and - Exercise additional precautions taken/awareness during hot/dry/windy weather conditions. This can include slowing/minimising/stopping certain onsite processes as appropriate.
5	Noise Pollution	<ul style="list-style-type: none"> - Ensure strict adherence to the onsite Noise Management Plan; - Operate within approved hours: 7.00am and 6.00pm Monday to Friday (maintenance activities may be conducted between 7.00am and 1.00pm on Saturday); and - Mobile plant and equipment to be regularly serviced in accordance with the manufacturer's recommendations.

Inventory of pollutants

Item	Description	Location	Maximum Storage Capacity
1	Diesel	Mulgoa Quarries refuelling truck daily deliveries onsite.	8,000litres
2	Grease	Oil Shed	2 x box of 250grm tubes
3	Transmission oil	Oil Shed	2 x 20 litre drums
4	Engine Oil	Oil Shed	2 x 20 litre drums
5	Hydraulic Oil	Oil Shed	2 x 20 litre drums
6	Coolant	Oil Shed	2 x 20 litre drums
7	Anti-bacterial soap	Toilet	2 x 250grm bottles
8	Hand Cleaner	Toilet	1 x 5litre pump container
9	Hand Sanitizer	Site office	2 x 1litre bottles
10	Vinyl Gloss	Site office	1 x 20 litre drum
11	Window Cleaner	Site office	1 x 15 litre drum

Safety equipment

Onsite safety equipment includes:

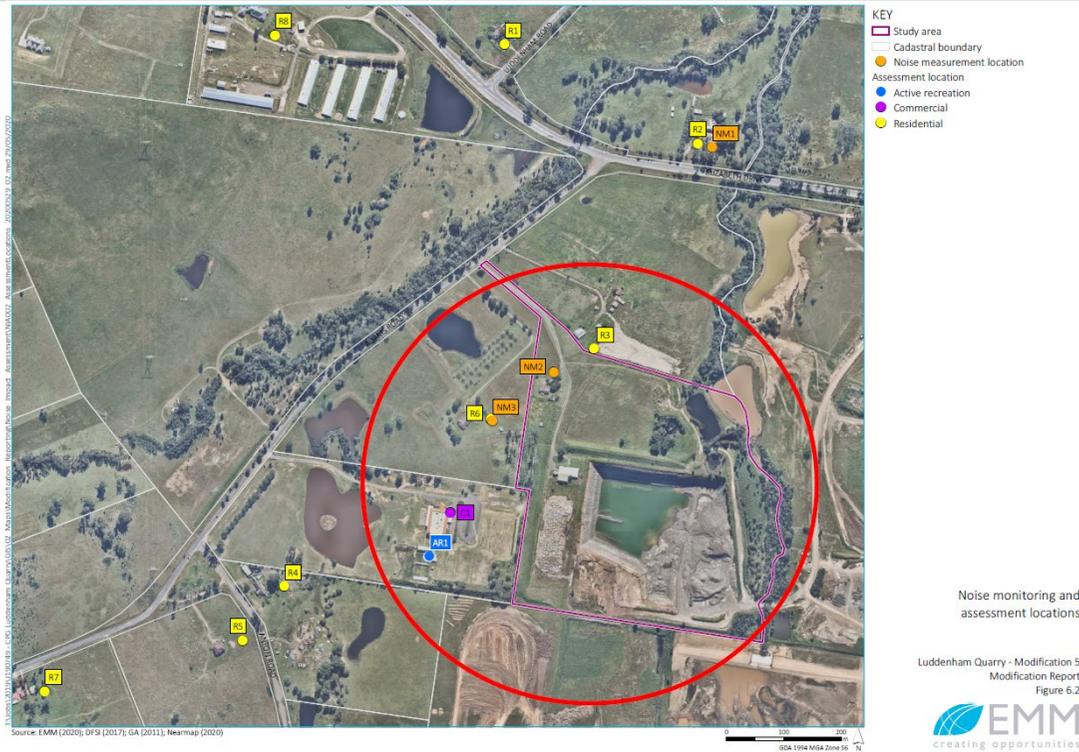
- Protective gloves;
- Safety Glasses
- Protective face masks;
- Hard hats;(where required)
- First aid kits including eye wash;
- Fire extinguishers;

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- Spill kit;
 - Safety inspection pre-start checklists for mobile plant and equipment;
 - Snake bite kit

Communicating with neighbours and the local community

Neighbours and local community (details above) are to be immediately notified of a pollution incident. Particularly the following should be considered and implemented as appropriate:

- Communication should be made to all relevant stakeholders and neighbours having regard to the following:
 - The nature of the incident (ie spill, dust etc) and possible effects this will have on the surrounding environment and people;
 - Type of communication (ie phone, letter drop, SMS etc);
 - Contact details should be left with relevant stakeholders and neighbours so that they can contact KLF/Mulgoa at any time to discuss the matter;
 - Instructions and suggestions can be provided in order to inform neighbours what they can do to minimise any harm to people or environment (as applicable and as appropriate);
 - Response by KLF/Mulgoa (including clean up phases/strategy, changes to be made to prevent incident from re-occurring);
 - Ongoing communication as appropriate to update stakeholders/neighbours on the status of the rectification; and
 - Final communication once clean-up/rectification is complete.
 - Suggested communication zone (having regard to the nature of the incident):
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Minimising harm to persons on the premises

Should an incident occur onsite, the following actions and arrangements are to be in place to minimise the risk of harm to people onsite:

- PPE (gloves, masks, hardhats etc) are always to be provided to all staff working onsite. This will particularly assist in instances of dusts related incidents;
- Assembly area is at the site office (see map below). This is to be used in the case of evacuation due to fire or any other incident that warrants an evacuation/assembly;
- Evacuations are to be implemented as appropriate in the case of a fire. In the instance of other incidents (ie spills), personnel onsite are to assist in the clean-up at the direction of management; and
- All people onsite are to follow the instructions of management personnel.

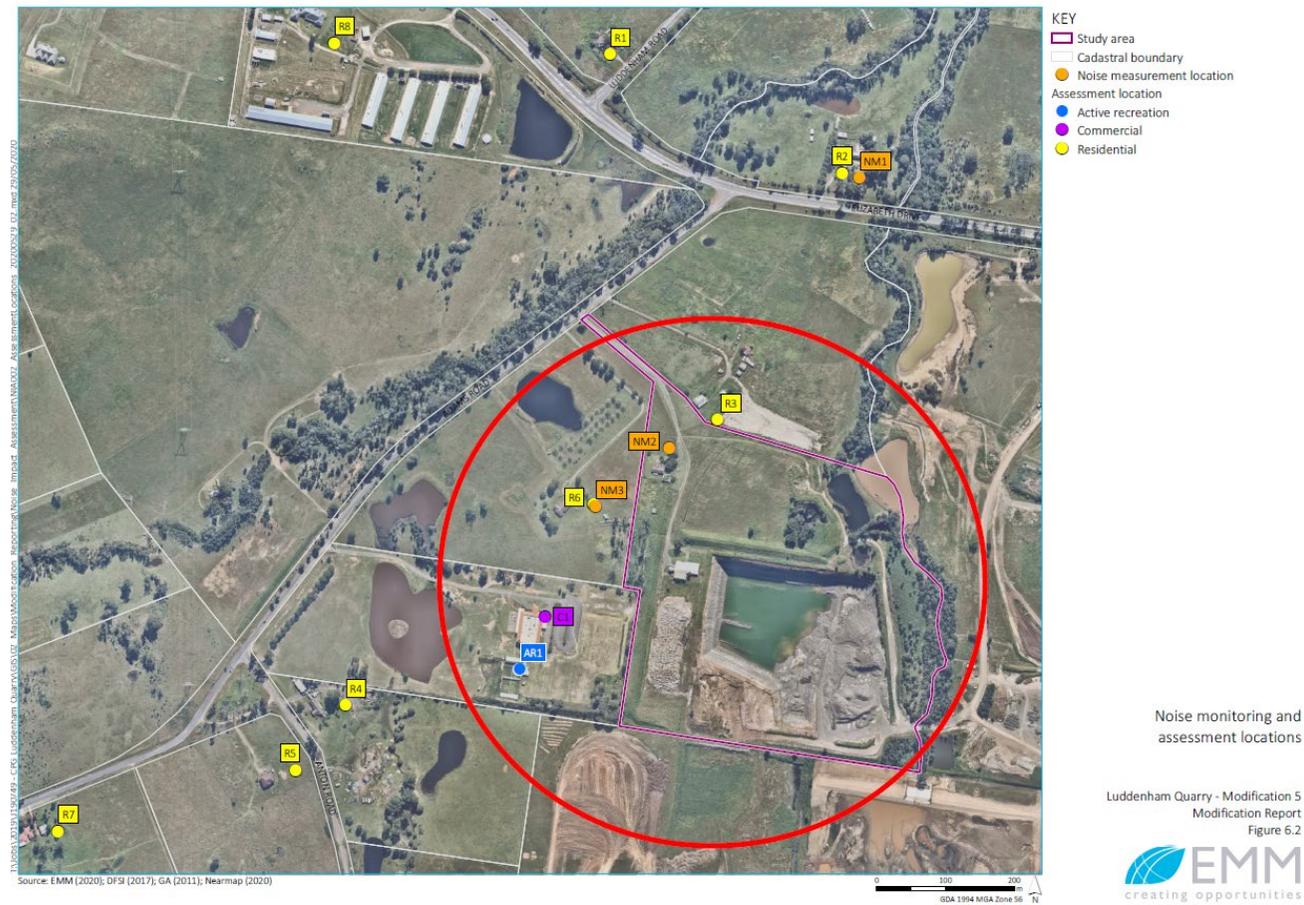


Maps

Provide a detailed map (or set of maps) showing the:

- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of any stormwater drains on the premises.

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).



Actions to be taken during or immediately after a pollution incident

The following actions are to be taken immediately after a pollution incident:

1. Pollution containment:

This is a priority. Having regard to the type of incident, onsite staff should act quickly to contain the pollution as best as possible. This could include utilisation of spill kit equipment, immediately shutting down processing plant, ceasing operations, use of firefight equipment etc.

2. Determine the scale of the pollution incident:

Assess the incident and determine the scale of the pollution incident.

3. Implement the relevant communication protocol:

If appropriate, communication with emergency services should be a priority (ie in the case of fire). Following this, further communication should be made with neighbours and the local community (as outlined above).

DPIE and any other relevant agencies must be immediately notified after staff become aware of an incident. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.

Notification of any environmental harm must also be made in accordance with Condition R2 of EPL21562.

4. Minimise harm to human health:

Minimising immediate harm to human health should be considered both during and immediately following a pollution incident (ie evacuation in the case of a fire). It may be necessary to implement the relevant processes here before communication to neighbours and the local community (if there is imminent threat to human health).

Having regard to the type of pollution incident, reducing and minimising harm to human health can be achieved by implementing the following steps (as appropriate):

- Early warnings to the neighbours and local community;
- Provide detailed information as to how the risk to human health can be minimised (ie recommending appropriate precautions to be taken);
- Providing regular updates of the containment and clean-up processes; and
- Notifying neighbours and the local community once the clean-up process is complete and there is no longer any risk to human health.

Having regard to the type of pollution incident, the following steps are to be undertaken in order to carry out the clean-up:

1. Assess the pollution incident (ie type, extent etc);
 2. Implement relevant clean up procedures where applicable. This could include contacting emergency services, engaging the appropriate contractors or the use of specific clean-up equipment like a spill kit. The processes will vary depending on the type of incident.
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3. Following completion of the clean-up, engage a suitably qualified contractor (eg occupational hygienist) to assess the situation and provide a determination/assessment on the effectiveness and completeness of the clean-up, as well as providing any relevant instructions for further works that might need to be carried out.

Coordinating with persons

Throughout the process of activating this PIRMP, identifying and implementing the relevant clean-up processes and confirming that the relevant clean-up process is satisfactorily complete, the following people and authorities are to be communicated and co-ordinated with (as applicable having regard to the pollution incident):

1. NSW EPA;
2. Fire & Rescue NSW;
3. NSW Health;
4. SafeWork NSW; and
5. Neighbours and the local community.

These communications are to be made through the responsible persons listed in this PIRMP, as well as any management staff member tasked with the responsibility of carrying out the clean-up process.

Staff training

Onsite staff are to be trained on the content and detail of this PIRMP. Particularly, training is to be carried out so that the relevant staff members are competent in:

1. Knowing when to activate this PIRMP including likelihood of its activation; and
2. The appropriate steps to be taken to implement this PIRMP as outlined above.

Training is to be carried out as needed to keep staff up to date (including training new staff), but no less than once every 12 months. Training is to take the form of:

1. Toolbox talks;
 2. Formal training (as required); and
 3. Desktop scenario exercises.
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Testing and updating of the PIRMP

PIRMP testing details

PIRMP is to be tested at least once every 12 months, or within 1 month of a pollution incident occurring. Details are to be completed below:

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
30/9/25	Harry Scartis John Scartis	Desktop test and assessment.	PIRMP Satisfactory	on or before 30/9/2026

PIRMP update details

PIRMP is to be reviewed at least once every 12 months and the review must have regard to such things as changes to onsite processes (including processing capacity), changes to site layout/storage, any changes to the surrounding area/environment or changes to contact details/persons responsible under this PIRMP. Any such changes should be considered in the context of whether there would be any change to risks/effects of a pollution incident.

Details of changes are to be recorded below and updated as a new version in the body of this PIRMP.

Date update occurred	Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
24/09/2025	Annual Review	The RIRMP was revised to incorporate the updated contact details.	30/09/2025	N/A