



Environment Protection Authority

Appendix B: PIRMP Template – Premises and mobile plant



Pollution incident response management plan

Licence number: 21995

Approved by: *Miguel Canas*

Position/Title: *Remediation Group Manager*

Signature: 

Date: *7/11/2026*

Purpose:

Ford Civil Contracting Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for *75-103 Links Rd, St Marys, NSW, 2760*. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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

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

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

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

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

Environment Protection Licence (EPL) details

Name of licensee: (including ABN)	<i>Ford Civil Contracting Pty Ltd (24 002 542 814)</i>
EPL number:	<i>21995</i>
Premises name and address:	<i>75-103 Links Road, St Marys, NSW, 2760</i>
Company or business contact details	Name: <i>Ben Ryan</i> Position or title: <i>Remediation Engineer</i> Business hours contact number/s: <i>0419 435 420</i> After hours contact number/s: <i>0404 047 165</i> Email: <i>ben.ryan@fordcivil.com.au</i>
Website address:	<i>www.fordcivil.com.au</i>
Scheduled activity/activities on EPL:	<i>Contaminated Soil Treatment</i>
Fee-based activity/activities on EPL:	<i>Contaminated Soil Treatment</i>

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: <i>Ben Ryan</i> Position or title: <i>Remediation Engineer</i> Business hours contact number/s: <i>0419 435 420</i> After hours contact number/s: <i>0404 047 165</i> Email: <i>ben.ryan@fordcivil.com.au</i>
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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: *Colin Shaw*

Position or title: *Site Supervisor*

Business hours contact number/s: *0419 435 420*

After hours contact number/s: *0482 457 745*

Email: *colin.shaw@fordcivil.com.au*

Managing response to pollution incident

Name of person responsible: *Ben Ryan*

Position or title: *Remediation Engineer*

Business hours contact number/s: *0419 435 420*

After hours contact number/s: *0404 047 165*

Email: *ben.ryan@fordcivil.com.au*

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 and 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 and Rescue NSW / Rural Fire Service	Contact number/s:	<i>(02) 9493 1077</i>
EPA	Contact number/s:	<i>131 555</i>
NSW Health	Relevant Area Health Service:	<i>Nepean Hospital</i>
	Contact number/s:	<i>(02) 4734 2000</i>
SafeWork NSW	Contact number/s:	<i>131 050</i>

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 that is affected, or potentially affected, by the pollution.

Contact number/s:

(02) 9677 7499

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

Contact number/s:

N/A

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):

Adjacent Construction Projects – Western Earth Moving (Pavement Upgrades on Links Rd)

St Marys Sydney Water Facility

State Asphalts NSW Pty

Various Businesses – 66, 74, 84, 92 and 98-102 Links Rd St Marys

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):

Letter drop to be completed prior to construction and following any incidents.

Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

Human health and environmental hazards associated with the long-term exposure to contaminated soils onsite (PFAS and PAH). PFAS and PAH constituents are non-volatile and potential human exposure pathways include inhalation of dusts / particulates, oral and dermal exposure. Environmental exposure pathways include direct exposure of flora and fauna to surface soils and contaminated water.

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

The likelihood of an environmental incident is relatively low. The work area will be suitably fenced to prevent public access. Dust suppression will be implemented throughout the project. All workers will be within closed cabin plant and equipment where possible. All surface water onsite will be captured within designated sediment basins. All water will be tested prior to discharge to South Creek as per EPL 21995 criteria.

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:

The work area will be suitably fenced to prevent public access. Dust suppression will be implemented throughout the project. All workers will be within closed cabin plant and equipment where possible. All surface water onsite will be captured within designated sediment basins. All water will be tested prior to discharge to South Creek as per EPL 21995 criteria.

Inventory of pollutants

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

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

Example

Location/tank	Max. quantity	Contents	Comments
e.g. Tank 1 – Workshop	1,000kg	Hydrochloric acid	
<i>SP30 Biosolid Stockpile</i>	<i>102,000m³</i>	<i>PFAS and PAH</i>	<i>Impacts</i>
<i>Asbestos Stockpile</i>	<i>4,000m³</i>	<i>Bonded Asbestos</i>	
<i>Dunheved Open Channel</i>	<i>30,000m³</i>	<i>PFAS</i>	<i>Impacts</i>

Safety equipment

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

Sediment Control (Clay Bunding, Silt Fence, dust suppression, etc)

1.8m Fencing

Water Treatment Plant (Granular Activated Carbon and Ion Resin Treatment)

Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried out:

Letter drop to be completed prior to construction and following any incidents or major project updates.

Develop any specific information that could be provided to the community, so it can minimise the risk of harm:

Relevant information will be provided at the front gate including a contact number for inquiries and construction No Entry Signage.

Minimising harm to persons on the premises

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

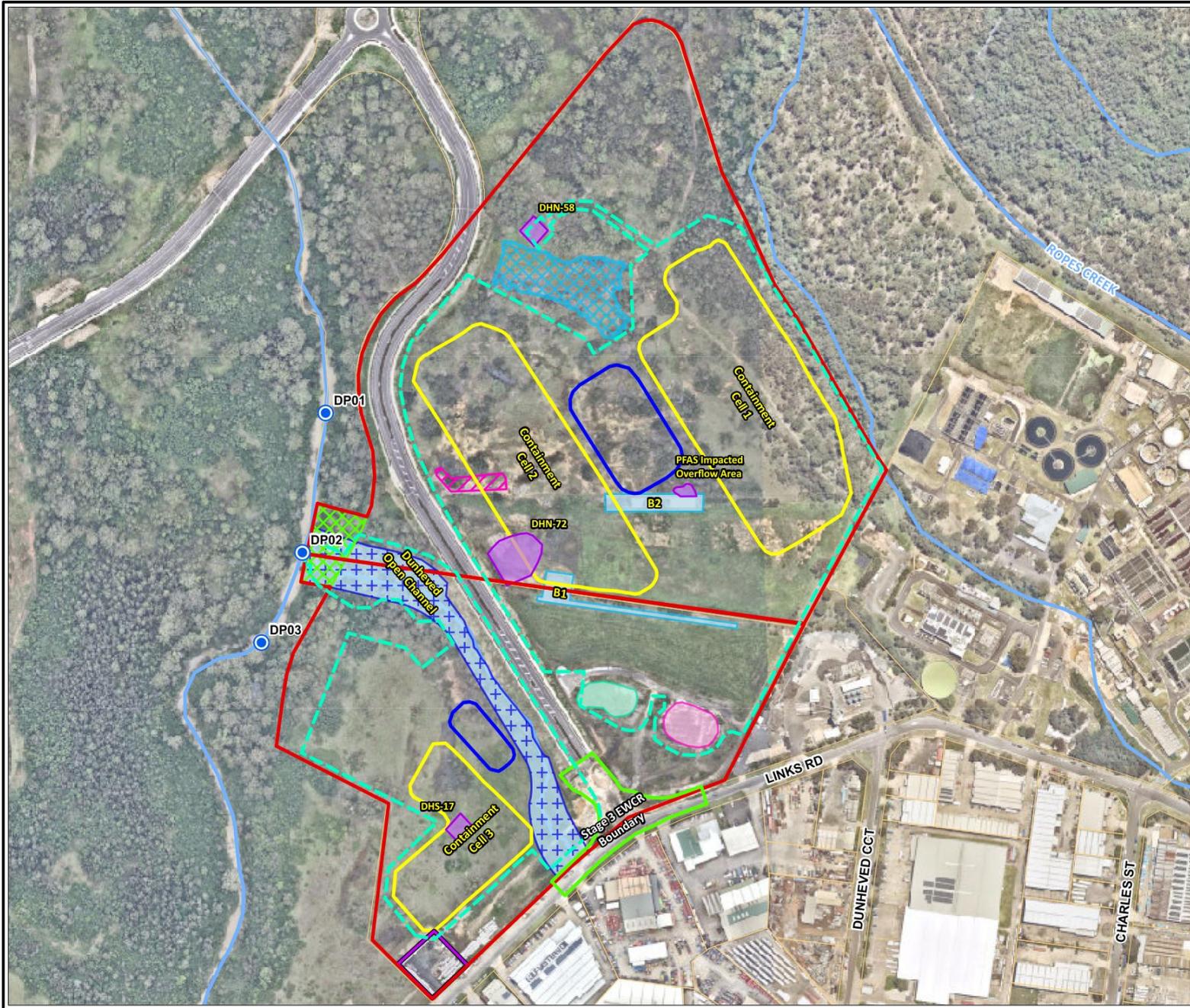
Workers will have correct PPE, standard construction PPE, plus adopting correct hygiene practices, washing hands, boots etc between entering and leaving PFAS impacted areas. Dust, air and sediment control / monitoring procedures will be implemented.

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.

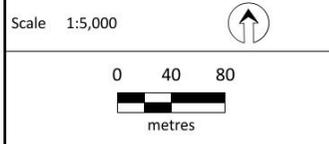
It is recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).



- Legend**
- Approximate Site Boundary
 - Stage 3 EWCR Boundary
 - Extent of Works
 - NSW Cadastre
 - Asbestos Stockpile
 - Dunheved Open Channel
 - Vegetation from SP30
 - PFAS Impacted Vegetation from the EWC Works
- Site Features**
- Existing Basins (B1 + B2)
 - Containment Cells
 - Hotspot Areas
 - Proposed Sediment Basins
 - WEM Site Compound
 - Riparian Corridor Included in Remedial works
 - Wetland to be Maintained
 - Proposed Surface Water Discharge Points



Job No: 66121
 Client: Ford Civil
 Version: L07 Rev A Date 25/06/2025
 Drawn By: IA Checked By: GB



Coord. Sys. GDA 1994 MGA Zone 56

**Central Precinct
 Dunheved, NSW**

**PROPOSED SURFACE WATER
 DISCHARGE POINTS**

FIGURE 3

Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

- *Site team to notify:*
 - *All relevant Authorities and Emergency Services.*
 - *EPA if the incident is considered to be a notifiable incident as per the EPL conditions.*
 - *Ford Civil Senior Management*
- *Site team to implement necessary actions to stop/ reduce/ minimise incident.*
- *Ford Civil Senior Management will determine the scale of the pollution incident and complete a detailed investigation to determine the cause of the incident.*

Develop 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:

- *Ford Civil Senior Management will provide ongoing updates to relevant stakeholders (i.e. impacted community) in relation to the extent of the incident and the immediate and ongoing risk of harm to human health.*
- *The impacted area will be suitably delineated. The cause of the incident will be identified and suitable actions will be implemented to stop/ reduce/ minimise the incident.*

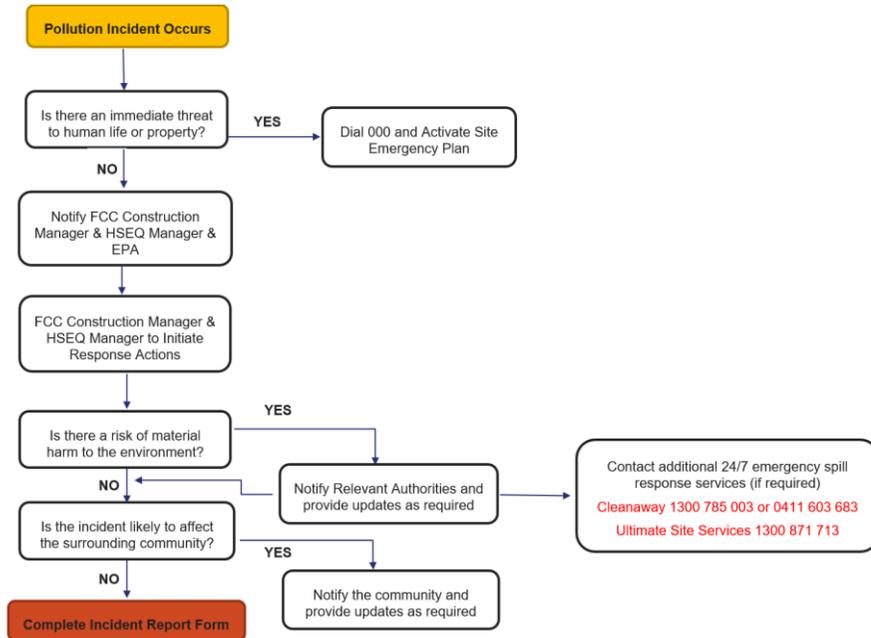
Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

- *The impacted area will be suitably delineated. The cause of the incident will be identified and suitable actions will be implemented to stop/ reduce/ minimise the incident.*
- *Ford Civil hold Contractors Pollution Liability.*

Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

Refer below flow chart.



Identify the person/s through whom all communications are to be made:

Name of person responsible: Ben Ryan

Position or title: Remediation Engineer

Business hours contact number/s: 0419 435 420

Email: ben.ryan@fordcivil.com.au

Name of person responsible: Lawrence Saliba

Position or title: HSEQ Manager

Business hours contact number/s: 02 9597 4122

Email: Lawrence.saliba@fordcivil.com.au

Staff training

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

All staff onsite will receive ongoing training in environmental issues via:

- *Daily prestart meetings*
- *Toolbox talks*
- *Review of incidents or near misses*

Testing and updating of the PIRMP

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

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Detail how the testing is documented and recorded (this must include the testing dates and names of all staff members who carried out the testing):

A desktop scenario will be completed within the first month of the project and then every 12 months or within one month of any pollution incident. The outcomes of the desktop scenario will be recorded via a Toolbox Talk.

Detail the dates on which the plan was updated:

Revision 0 28/10/2025

Revision 1 06/02/2026

Example: PIRMP testing details

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)
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09/01/2026	Lawrence Saliba, Environment Manager	Desktop simulation – chemical spill	N/A	09/12/2026
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PIRMP update details

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
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Rev 1 6/02/2026	PIRMP testing details	PIRMP testing details	N/A	6/02/2026
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