

Pollution Incident Response Management Plan

EPL 20637

reDirect Recycling

3B Williamson Road

Ingleburn NSW

Revision History

Rev No.	Date	Revision Notes	Prepared By	Authorised By
0	16/07/20	New PIRPM format	J Blomberg	V Bendeovski
1	25/02/21	Nil	J Blomberg	V Bendeovski
2	01/03/22	Nil	J Sutton	J Sutton
3	02/03/2023	Update Pollution Inventory	J Sutton	J Sutton

PIRMP Testing History

Test Date	Test By	Details of Test	Findings of Test	Next Scheduled Test
16/07/2020	J Blomberg	Desktop – Chemical Spill	Nil – All pre-emptive measures and controls checked.	25/02/2021
25/02/2021	J Blomberg	Desktop – Generation of wood dust	Nil – All pre-emptive measures and controls checked.	01/03/2022
01/03/2022	J Sutton	Desktop – Generation of dust from plant / vehicles	Nil – All pre-emptive measures and controls checked.	27/03/2023
27/02/2023	J Sutton	Desktop – Hydrocarbon spill	Nil – All pre-emptive measures and controls checked.	27/03/2024
07/03/2024	J Sutton	Desktop – Generation wood dust	Nil – All pre-emptive measures and controls checked.	27/03/2025
11/03/2025	J Sutton	Desktop – Chemical Spill	Nil – All pre-emptive measures and controls checked.	27/03/2026

A Pollution Incident Response Management Plan (PIRMP) must be prepared for all Projects based in NSW that hold an Environmental Protection Licence (EPL), or for any project if directed to prepare one by the EPA. This PIRMP has been prepared for reDirect Recycling, 3B Williamson Road, Ingleburn NSW.

It is a requirement under Clause 98D of the Protection of the Environment Operation Amendment Regulations 2012 that this PIRMP be made publicly available within 14 days after it is prepared on a publicly accessible (Company) website or, if there is no such website, by providing a copy of the plan, without charge, to any person who makes a written request for a copy.

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority, Campbelltown Council and other relevant authorities specified in the POEO Act, and people outside the project who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident associated with the operation of the facility by identifying risk and the development of actions to minimise and manage those risks; and
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for enacting it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

1) External Notification Protocol

The following authorities must be contacted in the order below immediately for pollution incidents that threaten or cause material harm to the environment.

Table 1 External Notification Protocol

Authority	Phone Number
Emergency Services – Fire and Rescue NSW Police NSW Ambulance Service	000*
*Only ring 000 if the incident presents an immediate threat to human health or property and requires Emergency Services. If the incident does not require an initial combat agency or once the 000 call has been made, notify as listed below	
EPA Pollution Hotline	131 555
Ministry of Health – Liverpool Hospital	9828 3000
SafeWork NSW	131 050
Local Authority – Campbelltown Council	4645 4000
Fire and Rescue - Ingleburn Fire Station	9829 2200 (when HAZMAT not required)

When notifying authorities that a pollution incident has occurred, the following information must be provided:

1. The time, date, nature, duration and location of the incident
2. The location of the place where pollution is occurring or is likely to occur
3. The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
4. The circumstances in which the incident occurred (including the cause of the incident, if known)
5. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If information required in items 3, 4 and 5 are not known when the initial notification is made but becomes known afterwards, that information must be provided to the authority immediately after it becomes known.

2) Community Notification and Action Protocol

Notification to any residents, businesses or other premises that may be affected by the pollution incident may include the following:

1. Details of the pollution incident and extent of impact (as known at the time)
2. Safety warnings and recommendations to prevent/minimise impacts, if required
3. Potential impacts on the operation of local businesses, if required

In the event of a pollution incident which has the potential to impact the local community, the Site Manager will notify the Environmental & Regulatory Compliance Manager who will determine if community notification is required. The Emergency Procedure Flipchart provides contact details of those businesses immediately surrounding the facility for quick reference in the event of an incident.

The following table lists the mechanisms to be followed in the event that a pollution incident has the potential to impact the surrounding community in order to minimise the risk of harm.

Table 2 Community Notification and Action Protocol

Pollution Incident Scenario	Potential Impacts	What to do (response)	Who to Notify	When to notify	Communication Mechanism
Hydrocarbon or chemical spill, including refuelling activities, entering stormwater drain and Bunbury Curran Creek	Pollution to Bunbury Curran Creek Exposure to chemicals Community complaints	Control and contain spill (if safe to do so) and protect stormwater drains with items from spill kit to prevent further pollution Commence clean up Site Manager to assess and notify Environmental & Regulatory Compliance Manager	Campbelltown City Council	During clean-up of incident	Telephone
Excessive wheel generated dust or wood dust leaving the site	Air quality issues Community complaints	Use dust suppression immediately to control source, ensure stormwater drains are protected with boom/sock/sandbag to prevent pollution to waterway Street sweeper to clean hardstand areas and local roads where necessary	Campbelltown City Council Adjacent businesses	Immediately where community impacted - including adjacent businesses	Telephone Door knock
Smoke from fire either within the Processing Building, Pallet Repair Building, Pre-mulching Wood Stockpile or Pallet Stacks	Air quality issues Community complaints	Activation of fire sprinkler system Use of fire hose reels	Campbelltown City Council Adjacent businesses	Immediately where community impacted - including adjacent businesses	Telephone Door knock

3) Definition of a Pollution Incident

A pollution incident that requires notification to authorities is defined in section 147 of the Protection of the Environment Operations Act 1997 as:

- (a) *Harm to the environment is material if:*
- (i) *It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
 - (ii) *If results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
- (b) *Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

Note: anyone on site can activate the PIRMP though external notification is the responsibility of management

4) Hazard Identification and Pre-emptive Measures

The Environmental Management Plan's associated with reDirect identify environmental aspects and impacts of the site including potential hazards and management measures to be employed relevant to pollution including water, waste, noise and air quality. Table 3 lists the main potential hazards and Table 4 provides a risk assessment of these hazards and includes applicable pre-emptive measures and controls. Refer to Emergency Procedure Flipchart for actions and arrangements to minimise the risk of harm to any persons on the premise should an incident occur which is located on the site Safety Notice Board. This includes identification of muster points, evacuation procedures and immediate actions to be taken in the event of an emergency or an environmental incident, and important contact details including those for adjacent businesses to reDirect.

Table 3 Hazard Identification

Aspect	Hazards
Water	Storage of fuel and chemicals Refuelling activities Sediment laden water Fire water Poor management/maintenance of site surface water/stormwater system
Waste	<u>Liquid waste:</u> Fuels, oils, greases, engine coolant <u>Hazardous waste:</u> Lubricants Cleaning agents/detergents <u>Non-Complying Waste:</u> Non-recyclable and other putrescible general solid waste Spoil, concrete, rubble Plastics
Air	Dust Exhaust emission Wood dust/fibres Adverse weather conditions Fire

Table 4 Risk Assessment

Hazard	Impact (Human Health &/or Environment)	Inherited Risk Level	Pre-Emptive Measures & Control	Residual Risk Level
Sediment laden water leaving site, including mud tracking onto public roadways	Environment	12 HIGH	- site completely sealed with hardstand pavement - stormwater drains fitted with inlet screens	5 LOW
Pollution of waterway from hydrocarbon spills from machinery/refuelling/fuel storage (hazardous/liquid waste)	Human Health &/or Environment	14 HIGH	- plant hazard assessment conducted - regular plant checks - site plans identifying fuel storage area - minimal fuel/oils/greases/engine coolant etc. stored on site - adequately stocked spill kits	9 MEDIUM

			<ul style="list-style-type: none"> - Emergency Evacuation Plan - Emergency Procedure Flipchart 	
Pollution of waterway from fire water (sprinkler system)	Environment	14 HIGH	<ul style="list-style-type: none"> - fire sprinkler system within bunded Materials Handling area, fire water contained to site - stormwater drain inlet screens regularly inspected and cleaned as necessary 	5 LOW
Air pollution from fire smoke	Human Health &/or Environment	14 HIGH	<ul style="list-style-type: none"> - fire sprinkler system to extinguish fire as soon as practicable reducing smoke emission - all material contained within the Materials Handling area (i.e. no outside storage) 	9 MEDIUM
Non-complying waste or Special waste delivered to site	Human Health &/or Environment	13 HIGH	<ul style="list-style-type: none"> - clear identification of acceptable and non-acceptable/non-complying waste - Designated contaminated waste area area - contractual requirement with suppliers - employee training including site induction 	9 MEDIUM
Generation of dust from mobile equipment/vehicles	Human Health &/or Environment	14 HIGH	<ul style="list-style-type: none"> - traffic movements restricted to 15km/hr on site - dust suppression on site - trucks leaving site to have loads covered - site completely sealed with hardstand pavement 	5 LOW
Generation of wood dust	Human Health &/or Environment	12 HIGH	<ul style="list-style-type: none"> - all material contained within Material Handling area - site completely sealed with hardstand pavement 	5 LOW
Excessive exhaust emissions from plant	Human Health &/or Environment	14 HIGH	<ul style="list-style-type: none"> - all on-site fixed and mobile diesel-powered plant (excluding road vehicles) correctly fitted and maintained with manufactures specifications or standards - regular inspection of fixed and mobile plant to ensure optimal running conditions 	5 LOW

Table 5 Risk Assessment Matrix

		POTENTIAL CONSEQUENCE					
		INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS	
CATEGORY OF HARM	HEALTH & SAFETY →	<ul style="list-style-type: none"> Temporary discomfort or pain 	<ul style="list-style-type: none"> First aid treatment 	<ul style="list-style-type: none"> Medical treatment Lost work time 	<ul style="list-style-type: none"> Serious injury (e.g. amputation, admittance to hospital, permanent loss of body function) 	<ul style="list-style-type: none"> Fatality 	
	ENVIRONMENT →	<ul style="list-style-type: none"> No adverse impact (e.g. appearance issue only) 	<ul style="list-style-type: none"> Impact contained to site with simple clean-up process 	<ul style="list-style-type: none"> Impact contained to site requiring specialist clean-up 	<ul style="list-style-type: none"> Significant local environmental impact Specialist clean-up required 	<ul style="list-style-type: none"> Environmental impact of regional or national significance Long term damage 	
	BUSINESS CONTINUITY →	<ul style="list-style-type: none"> Process disruption, no impact on customer 	<ul style="list-style-type: none"> Process disruption with minor customer impact (e.g. late delivery) 	<ul style="list-style-type: none"> Damage to non-critical process (e.g. can transfer work to another process) Customer inconvenienced (e.g. customer suffers a loss) 	<ul style="list-style-type: none"> Loss of key processes Structural damage to facilities Loss of key supplier or customer Financial loss >\$500k AD 	<ul style="list-style-type: none"> Effective loss of site Long term loss of market share 	
	REPUTATION →	<ul style="list-style-type: none"> Public concern limited to individuals No broader political concern or media coverage 	<ul style="list-style-type: none"> Local community concern, political enquiry or media coverage 	<ul style="list-style-type: none"> Regional public concern, political enquiry or media coverage 	<ul style="list-style-type: none"> National public concern, political enquiry or media coverage Reduced ability to obtain capital or insurance 	<ul style="list-style-type: none"> International public concern, political enquiry or media coverage Reduced company or brand market value 	
	REGULATORY COMPLIANCE →	<ul style="list-style-type: none"> No requirement to report to authority 	<ul style="list-style-type: none"> Mandatory reporting but authority unlikely to take any action 	<ul style="list-style-type: none"> Authority likely to give informal warning 	<ul style="list-style-type: none"> Authority likely to give formal warning or on the spot fine Litigation/ prosecution possible 	<ul style="list-style-type: none"> Litigation/ prosecution likely 	
LIKELIHOOD	ALMOST CERTAIN >99% probability, or is expected to occur in most circumstances, or could occur within days to weeks, or will occur repeatedly without corrective action	11 HIGH	16 HIGH	20 EXTREME	23 EXTREME	25 EXTREME	
	LIKELY 50-99% probability, or will probably occur in most circumstances, or could occur within weeks to months	7 MEDIUM	12 HIGH	17 HIGH	21 EXTREME	24 EXTREME	
	POSSIBLE 20-50% probability, or should occur at some time, or could occur within months to years	4 LOW	8 MEDIUM	13 HIGH	18 EXTREME	22 EXTREME	
	UNLIKELY 1-20% probability, or could occur but would not be expected, or could occur in years to decades	2 LOW	5 LOW	9 MEDIUM	14 HIGH	19 EXTREME	
	EXTREMELY UNLIKELY <1% probability, or may occur but only in exceptional circumstances, or only occur as a 100 year event	1 LOW	3 LOW	6 MEDIUM	10 HIGH	15 HIGH	
LOW	Manage by routine procedures	MEDIUM	Manage by SOP/JSA	HIGH	Manage by policy and specific training (critical standards)	EXTREME	Detailed research and management planning is required at a senior level (i.e. Do we really need to have this risk and if so how is it best managed)

5) Contact Details and Notification Protocol

The Emergency Procedure Flipchart contains an emergency phone list including services/utilities, adjacent neighbours and employees relevant to reDirect. Table 6 below provides information for key personal who are responsible for managing the response on site, and those who are authorised to notify the relevant authorities as noted in Table 1 External Notification Protocol.

Table 6 Contact Details & Level of Authority

Name	Position	Phone Number	Notify Authorities (Y/N)
Aaron Hudson	General Manager	0408 408 841	*Y
Albert Matson	Operations Manager	0437 606 501	*Y
James Sutton	Environmental Manager	0414 987 168	*Y
Victor Bendeviski	Environment and Regulatory Compliance (ERC)	0410 327 635	Y

*after discussing with ERC

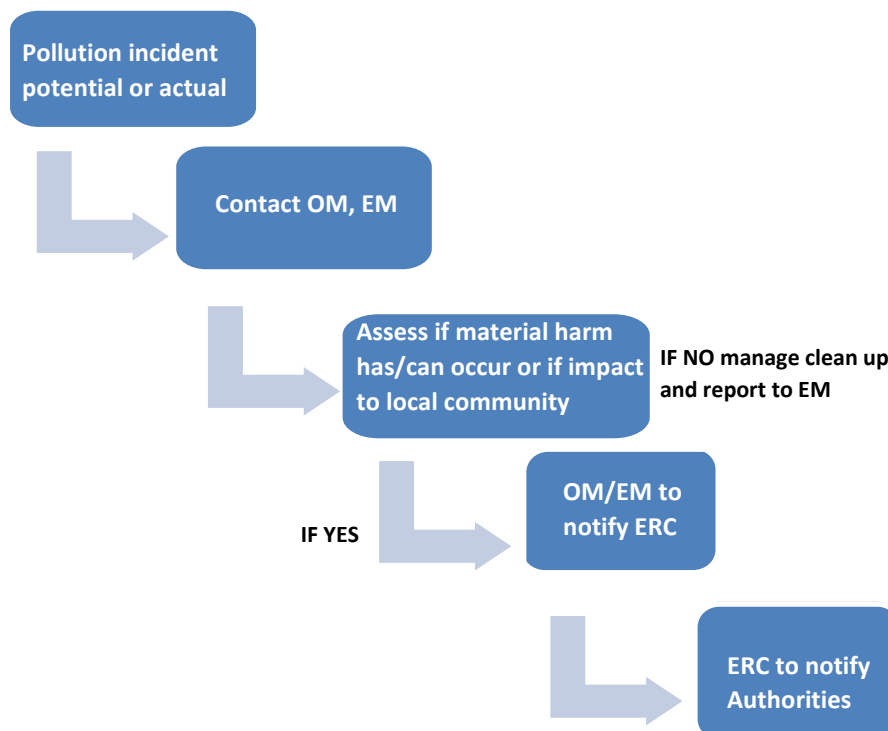
In the event that a potential pollution incident has occurred, the person who discovered this is to take charge until relieved by a senior employee or emergency services personnel and follow the Pollution Incident Internal Notification protocol as shown below in Figure 1.

The Emergency Procedure Flip Chart is the site 'Go-To' information for activating the PIRMP. This is located on the site Notice Board.

Mechanisms used to communicate with the public to provide, where possible, early warning of and following a pollution event that has the potential to impact the surrounding community can be found above in Section 2 and Table 2. These mechanisms will also be used to regularly update those affected by an incident.

Figure 1 Pollution Incident Internal Notification

(OM Operations Manager, EM Environmental Manager, ERC Environmental and Regulatory Compliance)



6) Inventory

Table 7 Pollution Inventory of potential onsite pollutants

Potential Pollutant	Location on site	Type of containment	Maximum quantity on site
Fuels	Diesel tank – Workshop	Double skinned tank, internal storage area, no stormwater drains	Workshop = 1,000L
	Diesel tank – Front carpark	Double skinned tank, concrete bund with awning	Front carpark = 12,000L
Lubricants/Oils	Workshop	Internal storage area, no stormwater drains, bund	6,000L
Diesel Exhaust Fluid (Adblue)	Workshop	Internal storage area, no stormwater drains, bund	1,000L
Hydraulic oil	Workshop	Internal storage area, no stormwater drains, bund	<100L

7) Safety Equipment

A description of safety equipment used to minimise or prevent the risks to human health and the environment, and to contain or control a pollution incident is outlined within the Emergency Procedure Flipchart. The Site Environment Map (Appendix 2) shows the locations of safety response equipment which includes spill kits, fire hose reels and fire extinguishers. This Map is displayed on the site Notice Board.

Spill kits will be maintained stocked at all times and will include:

- Absorbent pads, pillows, mini booms & granular absorbent material
- Nitrile gloves
- Disposal bags and ties
- Instruction card

Hardcopies of Safety Data Sheets (SDS) and Chemical Risk Assessments are stored in the site office with softcopies maintained locally on the Company's electronic information management system.

8) Maps

Appendix 1 Regional Context shows the location of the premise, surrounding land uses and local water course which could be impacted in the event of a pollution incident.

Appendix 2 Site Environmental Map shows the location of the potential pollutants on site, stormwater drains, stormwater runoff direction, site safety equipment and emergency assembly area.

These maps are displayed on the site Safety Notice Board.

9) Training

Details regarding the nature and objectives of any staff competence, training and awareness are outlined in the Operational Environment Management Plan, Instruction and Training section. Several forms of environmental training will be provided. Training records are maintained on site and on the Company's electronic information management system.

Examples of training include:

- Site induction, including environmental roles and responsibilities;
- Toolbox talks & Standard Operating Procedures;
- Environmental Awareness Training for specific issues; and
- Work Method Statements/Job Safety Analysis.

10) Testing & Review

The testing of this plan shall be carried out in such a manner as to ensure that the information included in this plan is accurate and up to date, and the plan is capable of being implemented in a workable and effective manner. Any such test is to be carried out:

- Routinely at least every 12 months
- And Within one month of any pollution incident occurring to assess, whether the information included in the plan is accurate and up to date

Testing of the PIRMP will cover all components of the plan, including the effectiveness of training and will involve desktop simulation and practical exercise or drill.

Appendix 1 Regional Context



