



Pollution Incident Response Management Plan

reDirect Recycling

24 Davis Road

Wetherill Park NSW

Document Control

| Rev No. | Rev Date | Author/Position | Details | Tested / Scenario | Authorised | |
|---------|------------|----------------------------------|---------------------------|--|-----------------------------------|---|
| | | | | | Name/Position | Signature |
| 0 | 24/08/2022 | J Sutton Environmental Manger | Rev 0 for implementation | No | J Sutton Environmental Manager |  |
| 1 | 17/07/2022 | J Sutton Environmental Manger | For issue (annual review) | Yes / Overflow from Drill mud receival pit | J Sutton Environmental Manager |  |
| | | | | | | |

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 NSW EPA. This PIRMP has been prepared for reDirect Recycling, 24 Davis Road, Wetherill Park 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, Fairfield City 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 – Blacktown Hospital | (02) 9881 8000 |
| SafeWork NSW | 131 050 |
| Local Authority – Fairfield City Council | 9725 0222 |
| Fire and Rescue – Smithfield Fire Station | 02 9493 1041 (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, Prospect Creek or nearby body of surface water (i.e., local dam). | Pollution to local creeks and bodies of water. 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 Manager | Fairfield City Council Adjacent businesses | During clean-up of incident | Telephone |
| Excessive wheel generated dust leaving the site Dust from drop off / pick up of materials | 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 | Fairfield City Council Adjacent businesses | Immediately where community impacted - including adjacent businesses | Telephone Door knock |
| Smoke from fire within material processing and handling shed | Air quality issues Community complaints | Use of fire hose reels and sprinkler systems | Fairfield City Council Adjacent businesses | Immediately where community impacted - including adjacent businesses | Telephone |
| Overflow from drill mud receival pit caused by pump failure. | Pollution to local creeks and bodies of water. Community complaints | Bund area around pit to stop spread of water and sediment. Stop all incoming loads. Manually drain pit with excavator. | Fairfield City Council Adjacent businesses | Immediately where community impacted - including adjacent businesses | Telephone |
| Ruptured processed water tank | Pollution to local creeks and bodies of water. Community complaints | Bund area to stop spread of water and sediment. Stop all incoming loads. | Fairfield City Council Adjacent businesses | Immediately where community impacted - including adjacent businesses | Telephone |

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

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 Processed Water |
| Waste | <u>Liquid waste:</u> Fuels, oils, greases, engine coolant <u>Hazardous waste:</u> Lubricants Cleaning agents/detergents Chemicals <u>Non-Complying Waste:</u> Non-recyclable and other putrescible general solid waste |
| Air | Dust Exhaust emission 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 | - stormwater drains fitted with inlet screens - Sand filter drainage screen run off - use of silt fences | 5 LOW |
| Sediment laden water leaving site due to overflow of drill mud pit | Environment | 8 MEDIUM | - stormwater drains fitted with inlet screens - sand filter and drainage screen run off system - use of silt fences - high level alarms and Depth indicator - Drainage systems designed to capture spills and wash down. | 4 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 - Emergency Evacuation Plan - Emergency Procedure Flipchart | 9 MEDIUM |
| Pollution of waterway from fire water | Environment | 14 HIGH | - fire hose reel 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 | - fire hose reel system to extinguish fire as soon as practicable reducing smoke emission - all material contained within the Materials Handling areas and designated storage bays | 9 MEDIUM |
| Non-complying waste or Special waste delivered to site | Human Health &/or Environment | 13 HIGH | - clear identification of acceptable and non-acceptable/non-complying waste - 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 10km/hr on site - dust suppression on site - trucks leaving site to have loads covered - Hard stand cover | 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 | <i>Hazard may be "Significant"</i> | |
| | 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"> Significant local environmental impact Specialist clean-up required | <ul style="list-style-type: none"> Environmental impact of regional or national significance Long term damage |
| | 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"> 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 |
| | 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"> National public concern, political enquiry or media coverage Reduced ability to obtain capital or insurance | <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 | MEDIUM | HIGH | 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) |
| | Manage by routine procedures | Manage by SOP/JSA | Manage by policy and specific training (critical standards) | | | |

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) |
|-------------------|---------------------------------------|--------------|--------------------------|
| Neale Hogarth | Operations Manager – Vineyard | 0498 692 443 | *Y |
| James Sutton | Environmental Manager | 0414 987 168 | *Y |
| Victor Bendeviski | Environment and Regulatory Compliance | 0410 327 635 | Y |

*after discussing with ERC

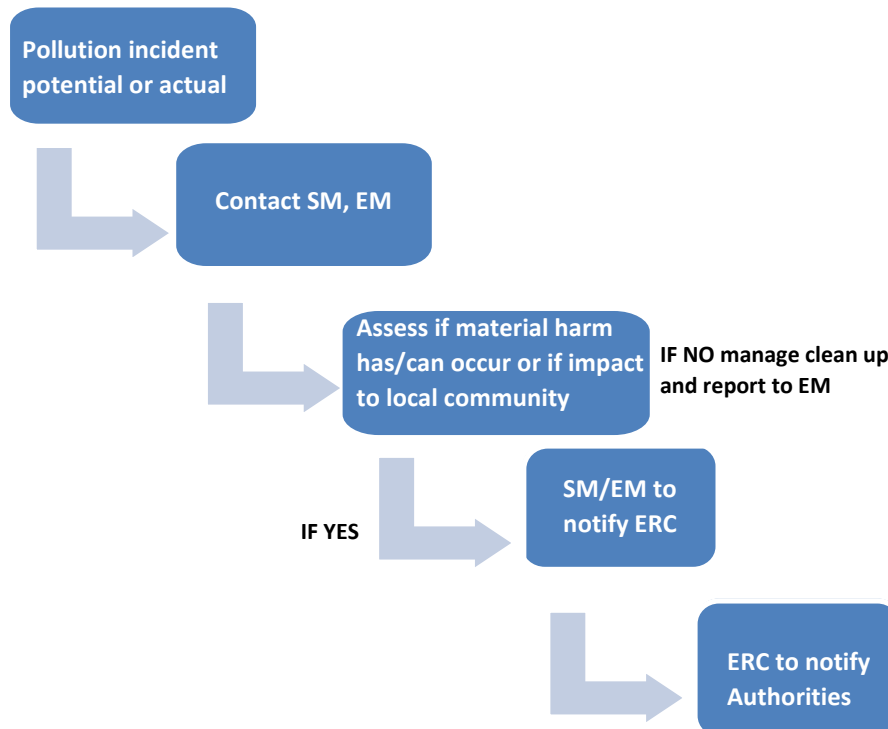
In the event that a potential pollution incident has occurred, the person who discovered this is to take charge until relieved by more senior employee or emergency services personnel and follow the Pollution Incident Internal Notification protocol as shown below in Figure 1.

The Emergency Procedure Flip Chart is the site ‘Go-To’ information for activating the PIRMP. This is located on the Safety 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

(SM Site Manager, EM Environmental Manager, ERC Environmental and Regulatory Compliance)



6) Inventory

Table 7 Pollution Inventory of potential onsite pollutants

| Potential Pollutant / Hazard | Location on site | Type of containment | Maximum quantity on site |
|--|---|--|-----------------------------------|
| Sediment laden stormwater | Wheel generated (i.e. tracked onto site during material delivery) | Stormwater management system including inlet screens fitted to stormwater drains and sand filter for leaving site. | N/A |
| Various fuels, lubricants and common chemicals | Mobile and fixed plant / equipment In shed | Bunded materials handling building | Approx. 200L |
| Polymer Systems | Shed | Storage Tank | 6500 L (P80 1500 L & P140 5000 L) |
| 2 x Coagulate IBC | Shed | Bunded IBC | 2000 L (2 x 1000 L) |
| Diesel | Shed | Above ground storage tank | 13,000L |
| 2 x Hydrotip sumps | Shed | Sump | 40,000L (20,000 L each) |
| 2 x G: Max sumps | Shed | Sump | 16,000 L (8,000 L each) |
| Log wash machine | Shed | sump | 10,000 L |
| Clarification tank | Shed | Storage tank | 100,000 L |
| 2 x Sludge buffer tank | Shed | Storage tank | 200,000 L (100,000 L each) |
| Process water tank | Shed | Storage tank | 100,000 L |
| 2 x Clean water tanks | Shed | Storage tank | 200,000 L (100,000 L each) |
| Emergency overflow drill mud pit | Shed | Concrete pit | 150,000 L |

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 Safety Notice Board.

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

- Absorbent pads, pillows & 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 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



Appendix 2 Site Environment Map

