

Aussie Recycling

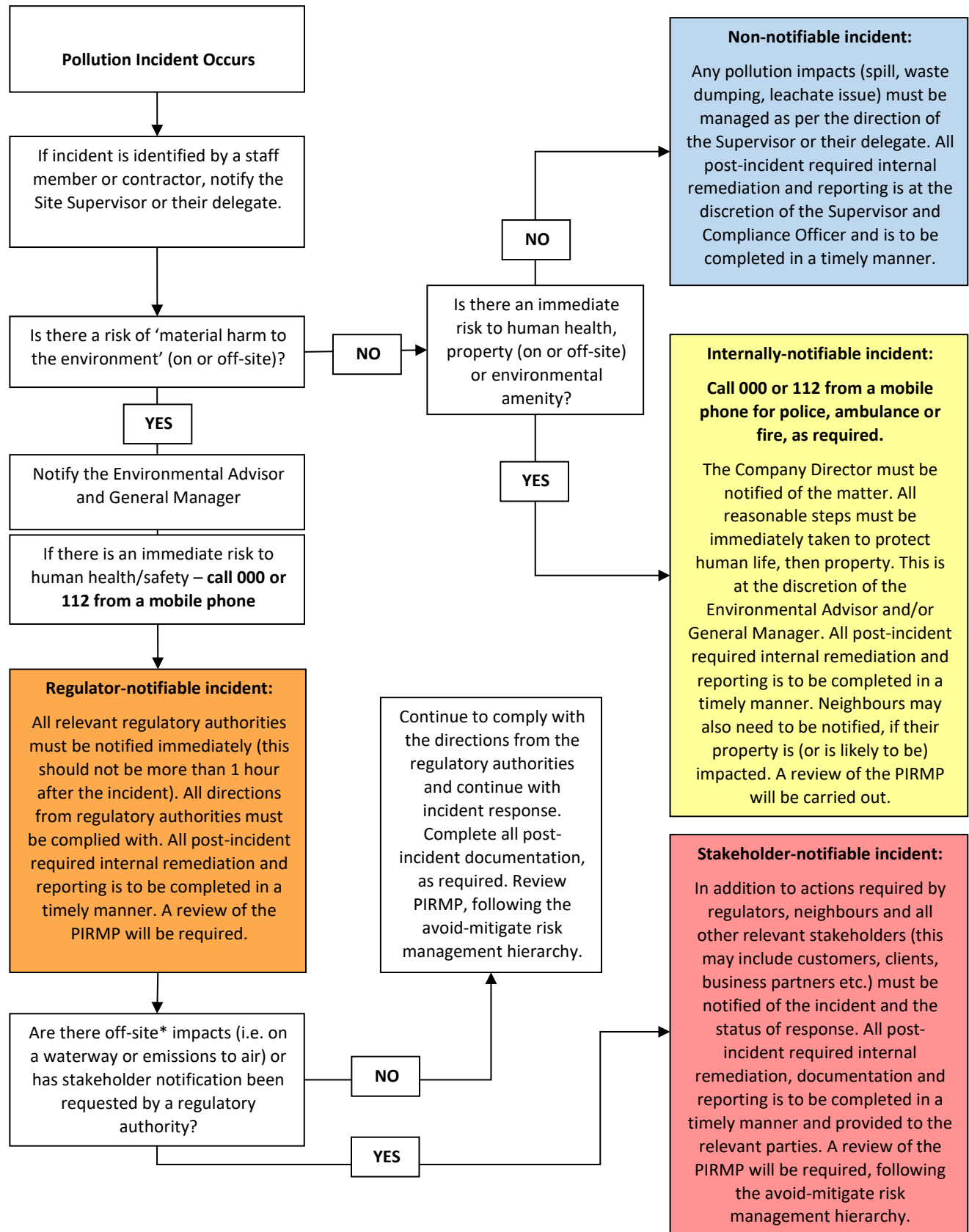
Pollution incident response procedure

Important:

This procedure must be read and understood by all staff at the site



Pollution incident response flowchart



Pollution Incident Occurs

If incident is identified by a staff member or contractor, notify the Site Supervisor or their delegate.

Is there a risk of 'material harm to the environment' (on or off-site)?

YES

Notify the Environmental Advisor and General Manager

If there is an immediate risk to human health/safety – call **000** or **112** from a mobile phone

Regulator-notifiable incident:
All relevant regulatory authorities must be notified immediately (this should not be more than 1 hour after the incident). All directions from regulatory authorities must be complied with. All post-incident required internal remediation and reporting is to be completed in a timely manner. A review of the PIRMP will be required.

Are there off-site* impacts (i.e. on a waterway or emissions to air) or has stakeholder notification been requested by a regulatory authority?

NO

Is there an immediate risk to human health, property (on or off-site) or environmental amenity?

YES

Continue to comply with the directions from the regulatory authorities and continue with incident response. Complete all post-incident documentation, as required. Review PIRMP, following the avoid-mitigate risk management hierarchy.

NO

YES

Non-notifiable incident:
Any pollution impacts (spill, waste dumping, leachate issue) must be managed as per the direction of the Supervisor or their delegate. All post-incident required internal remediation and reporting is at the discretion of the Supervisor and Compliance Officer and is to be completed in a timely manner.

Internally-notifiable incident:
Call 000 or 112 from a mobile phone for police, ambulance or fire, as required.
The Company Director must be notified of the matter. All reasonable steps must be immediately taken to protect human life, then property. This is at the discretion of the Environmental Advisor and/or General Manager. All post-incident required internal remediation and reporting is to be completed in a timely manner. Neighbours may also need to be notified, if their property is (or is likely to be) impacted. A review of the PIRMP will be carried out.

Stakeholder-notifiable incident:
In addition to actions required by regulators, neighbours and all other relevant stakeholders (this may include customers, clients, business partners etc.) must be notified of the incident and the status of response. All post-incident required internal remediation, documentation and reporting is to be completed in a timely manner and provided to the relevant parties. A review of the PIRMP will be required, following the avoid-mitigate risk management hierarchy.

Quick reference guide – incident types and response

	Incident Type	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Hydrocarbons	Diesel tank – catastrophic failure or damage	Stakeholder notifiable incident	<ol style="list-style-type: none"> If possible, shut off or contain the source of the leak; AND <ol style="list-style-type: none"> Lay down spill control products or earth on hardstand surfaces (i.e. concrete or asphalt) to contain the spill; AND <ol style="list-style-type: none"> If it is operationally possible, utilise mobile plant to construct a bund in the path of the fuel flow to capture and contain the flow (priority must be given to preventing the entry of hydrocarbons into waterways, particularly stormwater drains or the Cox Creek). Take all steps to remove sources of ignition. 	<ol style="list-style-type: none"> A catastrophic failure of the diesel tank or serious leak is likely to result in material environmental harm, particularly when the fuel comes into contact with bare earth or soil or enters a waterway. The Operations Manager or their delegate must notify the regulator(s); AND If the fuel enters Cox Creek or any other off-site waterway, the Operations Manager must also notify neighbours and other relevant stakeholders; AND The company Director must also be notified. 	<ol style="list-style-type: none"> Immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately isolate up any soils that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND Immediately engage a suitable contractor to repair the damage to the tank or replace the tank (with a product that addresses the cause of the incident); AND Engage a suitably qualified consultant to obtain soil samples from beneath porous hardstand areas (concrete, gravel, asphalt) to determine whether contamination of the earth below has occurred; AND Review any relevant management plans or operational procedures regarding hydrocarbon handling, management and procurement and review this PIRMP; AND Submit any required reports to the appropriate regulatory authorities.
	Diesel tank – minor leak	Internally notifiable incident	<ol style="list-style-type: none"> If possible, shut off or contain the source of the leak; AND <ol style="list-style-type: none"> Lay down spill control products or earth to contain the spill. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the volume and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately engage an excavator and truck(s) and dig up any soil or earth that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified water consultant; AND If regulatory authorities were notified, submit follow up written report(s) as required.
	Mobile plant/ vehicle fuel line leak or failure	Internally notifiable incident	<ol style="list-style-type: none"> If possible, shut off or contain the source of the leak; AND <ol style="list-style-type: none"> Lay down spill control products or earth to contain the spill. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the volume and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately engage an excavator and truck(s) and dig up any soil or earth that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified water consultant; AND If regulatory authorities were notified, submit follow up written report(s) as required.
	Mobile plant/ vehicle – other minor spill or leak	Internally notifiable incident	<ol style="list-style-type: none"> If possible, shut off or contain the source of the leak; AND <ol style="list-style-type: none"> Lay down spill control products or earth to contain the spill. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the volume and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately engage an excavator and truck(s) and dig up any soil or earth that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; AND If regulatory authorities were notified, submit follow up written report(s) as required.
	Hydrocarbon storage (container bund) - leak	Internally notifiable incident	<ol style="list-style-type: none"> Identify the point of leakage and block the leak if possible; AND Lay down spill control products or earth to contain the spill. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the volume and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified water consultant; AND If regulatory authorities were notified, submit follow up written report(s) as required.

	Incident Type	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
	Other hydrocarbon incident – threat to surface water	Regulator notifiable incident	<ol style="list-style-type: none"> If possible, identify the source of the hydrocarbon(s) and isolate/shut off the source; AND Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-site escape of the spill). 	<ol style="list-style-type: none"> A hydrocarbon spill that threatens surface water is likely to result in material environmental harm, particularly if the fuel enters an off-site waterway. The Operations Manager or their delegate must notify the regulator(s); AND If the fuel enters Cox Creek or any other off-site waterway, the Operations Manager or their delegate must also notify neighbours and other relevant stakeholders; AND If the fuel enters Cox Creek or any other off-site waterway, the company Director must also be notified. 	<ol style="list-style-type: none"> Immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately engage an excavator and truck(s) and dig up any soil or earth that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND 3. Engage a suitably qualified consultant to obtain soil samples from beneath porous hardstand areas (concrete, gravel, asphalt) to determine whether contamination of the earth below has occurred; AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; AND Submit any required reports to the appropriate regulatory authorities.
	Other hydrocarbon incident – no threat to surface water	Internally notifiable incident	<ol style="list-style-type: none"> Identify the point of leakage and block the leak if possible; AND Lay down spill control products or earth to contain the spill. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the volume and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Immediately engage an excavator and truck(s) and dig up any soil or earth that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified water consultant; AND If regulatory authorities were notified, submit follow up written report(s) as required.
Chemical	Chemical – minor spill (< 20L)	Non-notifiable incident	<ol style="list-style-type: none"> Contain the spill with spill kit products if appropriate; OR Leave the area if it is an enclosed space and the chemical is likely to produce a hazardous vapour; AND Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Operations Manager or their delegate. 	<ol style="list-style-type: none"> Material environmental harm may occur to soil, groundwater or surface water, depending on the chemical type and location of the leak. Regulator notification is at the discretion of the Operations Manager or their delegate. 	<ol style="list-style-type: none"> If regulatory authorities were notified, carry out all required remediation actions; AND Excavate any soil or earth that came into contact with the chemical (if required); AND Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste; AND Continue surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant. If regulatory authorities were notified, submit follow up written report(s) as required.
	Chemical – major spill (≥20L) or immediate threat to surface water	Internally notifiable incident	<ol style="list-style-type: none"> If it is possible to isolate/shut off the source of the chemical, do so; OR Leave the area if it is an enclosed space and the chemical is likely to produce a hazardous vapour; OR Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-site escape of the spill); AND Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Operations Manager or their delegate (or their delegate). 	<ol style="list-style-type: none"> A chemical spill that threatens surface water is likely to result in material environmental harm, particularly if the chemical enters an off-site waterway. The Operations Manager or their delegate must notify the regulator(s); AND If the chemical enters Cox Creek or any other off-site waterway, the Operations Manager or their delegate must also notify neighbours and other relevant stakeholders; AND If the chemical enters Cox Creek or any other off-site waterway, the company Director must also be notified. 	<ol style="list-style-type: none"> Immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s); AND Excavate any soil or earth that came into contact with the chemical (if required); AND Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste; AND Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; AND Submit any required reports to the appropriate regulatory authorities.

	Incident Type	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Illegal Waste	Illegal waste – nonhazardous solid prohibited Waste (not incidental)	Internally notifiable incident	<ol style="list-style-type: none"> 1. If the originator of the waste can be identified, the Operations or their delegate Manager must contact them and demand that the waste be removed at their expense; AND 2. Take any action required to minimise the risk of the waste contaminating soil, groundwater or surface water; this may involve covering with plastic or earth, excavating a channel or placing a bund around the waste to divert water etc.; AND 3. Put signage or exclusion tape to ensure persons stay away from the waste. 	<ol style="list-style-type: none"> 1. Non-hazardous (solid) prohibited waste is unlikely to pose a risk of material environmental harm, except in extreme circumstances (due to the volume, type or location of the waste). There is potential for the waste to impact on air, soil and water. Regulator notification is at the discretion of the Operations Manager or their delegate; OR 2. If the solid waste enters the Cox Creek or any other offsite waterway, the Operations Manager or their delegate must notify the regulator(s), neighbours and other relevant stakeholders. 	<ol style="list-style-type: none"> 1. If regulatory authorities were notified, carry out any remedial actions, which may be required by the regulator(s); AND 2. If regulatory authorities were notified, submit follow up written report(s) as required; AND 3. Ensure that the waste is removed (along with any contaminated materials) and disposed of at a facility that is suitably licensed to receive the waste; AND 4. Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant.
	Illegal waste – hazardous solid prohibited waste (not incidental)	Regulator notifiable incident	<ol style="list-style-type: none"> 1. If the originator of the waste can be identified, the Operations Manager or their delegate must contact them and demand that the waste be removed at their expense; AND 2. Take any action required to minimise the risk of the waste contaminating soil, groundwater or surface water (as appropriate, depending on the level of hazard pose); this may involve covering with plastic or earth, excavating a channel or placing a bund around the waste to divert water etc.; AND 3. If the hazardous material can be identified, information should be sought in regards to the specific hazards posed and appropriate management; AND 4. Put signage or exclusion tape to ensure persons stay away from the waste. 	<ol style="list-style-type: none"> 1. Non-hazardous (solid) prohibited may pose a risk of material environmental harm, particularly in extreme circumstances (due to the volume, type or location of the waste). There is potential for the waste to impact on air, soil and water. Regulator notification is at the discretion of the Operations Manager or their delegate; OR 2. If the waste enters the Cox Creek or any other offsite waterway, the Operations Manager or their delegate must notify the regulator(s), neighbours and other relevant stakeholders. 	<ol style="list-style-type: none"> 1. If regulatory authorities were notified, carry out any remedial actions, which may be required by the regulator(s); AND 2. If regulatory authorities were notified, submit follow up written report(s) as required; AND 3. Ensure that the waste is removed (along with any contaminated soil or other materials) and disposed of at a facility that is suitably licensed to receive the waste; AND 4. Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant.
	Illegal waste – liquid waste (not incidental)	Regulator notifiable incident	<ol style="list-style-type: none"> 1. Take any action required to minimise the risk of the waste entering groundwater or surface waterways (particularly off-site waterways) (as appropriate, depending on the level of hazard posed); this may involve the use of spill kit materials, excavating a channel or placing a bund around the waste to divert water etc.; 2. If the originator of the waste can be identified, the Operations Manager or their delegate must contact them and demand that the waste be removed at their expense; AND 3. If the hazardous material can be identified, information should be sought in regards to the specific hazards posed and appropriate management; AND 4. Put signage or exclusion tape to ensure persons stay away from the waste. 	<ol style="list-style-type: none"> 1. Non-hazardous (solid) prohibited is likely to pose a risk of material environmental harm, as seepage into soil is highly likely (where the liquid waste does not occur on a hardstand area) and entry into ground or surface water is also likely. Regulator notification is at the discretion of the Operations Manager or their delegate if the spill is confined on-site; OR 2. If the waste enters Cox Creek or any other offsite waterway, the Operations Manager or their delegate must notify the regulator(s), neighbours and other relevant stakeholders. 	<ol style="list-style-type: none"> 1. If regulatory authorities were notified, carry out any remedial actions, which may be required by the regulator(s); AND 2. If regulatory authorities were notified, submit follow up written report(s) as required; AND 3. Ensure that the liquid waste is removed and disposed of at a licensed facility; AND 4. Ensure that any contaminated soil and/or water is removed (along with any containment materials) and disposed of at a facility that is suitably licensed to receive the waste; AND 5. Continue with surface water monitoring as required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant.

Table 1: Quick reference guide for different types of incidents that have a reasonable likelihood of occurring at the site.

Notification Details

Communication with regulators and management authorities

There are several regulators and management authorities who may need to be notified in the event of a regulator-notifiable incident. These stakeholders are shown in the table below.

Table 1 - Authority contacts that requiring notification during a pollution incident

Authority	Description	Contact information
NSW Environment Protection Authority (EPA)	Main environmental regulator for sites with an EPL	131 555
Strathfield City Council	Local government environmental regulator	9748 9999
NSW Ministry of Health	Camperdown public health unit	02 9515 9420
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

Communication with emergency services and senior management

The following tables lists emergency services and senior management staff that may need to be contacted in the event of an incident.

Table 2 - Contact details for persons and organisations relevant to pollution incident and emergency response

Contact	In case of...	Number
General Manager (Nansi Philips)	Any pollution incident or potential pollution incident or emergency EXCEPT for non-notifiable incidents	0404 029 100
Shareholder and Consultant (Emmanuel Roussakis)	Any pollution incident or potential pollution incident or emergency EXCEPT for non-notifiable incidents	0414 266 772
Environmental Advisor (James Hammond)	Any pollution incident or potential pollution incident or emergency	0423 196 069
Site Operations Manager (Site Supervisor) (Leon Roussakis)	Any pollution incident or potential pollution incident or emergency	0422 266 772
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500
Lakemba Fire Station	Assistance with fire or pollution incident response	02 9759 5252
Strathfield Police Station	To report non time-critical crime, such as vandalism or illegal dumping	02 9746 7084
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234
Sydney Water	Pollution of drinking water or stormwater	13 20 90

Communication with neighbours and other stakeholders

Pre-emptive consultation with stakeholders

Ongoing consultation with all stakeholders in the development can help to ensure that problems are identified and addressed in a timely fashion. For external stakeholders, this can avoid misunderstandings which could expose the company to litigation or result in negative publicity. For internal stakeholders, this can increase productivity and reduce the incidence and severity of injuries. Ongoing consultation methods which are utilised include site 'toolbox' talks, training, and personal phone calls where relevant.

Stakeholder notifiable incident

When it is necessary, neighbours and external stakeholders will be promptly notified of a pollution incident. The extent of notification will be at the discretion of the Company Director, unless otherwise directed by a relevant regulator or management authority. The table below details relevant stakeholders and information pertinent to making a decision on whether notification is required.

Stakeholder	Likely to be affected by	Contact information/method
Nearest receivers	Harmful or nuisance emissions to surface water (off site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Immediate neighbours	Harmful or nuisance emissions to surface water (off site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Wider community/distant neighbours	Harmful emissions to surface water (off site), groundwater or air (that is likely to expand into the wider community).	Prompt letter drop.
Clients (i.e. recycled material purchasers)	Pollution events that result in the contamination of material or closure of the site.	See relevant client website/directory listing for office contact details – phone call.
Contractors or other internal stakeholders not on site	Pollution events that result in the closure of the site.	Various – phone call.
Business partners/investors	Pollution events that are likely to result in negative publicity for the business, regulatory action or closure (permanent or temporary).	Various – phone call.