Aussie Recycling

Pollution Incident Response Management Plan

Site: 108 Madeline Street, Strathfield South NSW

June 2023

Document information

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Revision history

Revision	Date	Details/comments	Review team	Authorisation
1	February 2017	Initial PIRMP preparation	Aussie Industries	Emmanuel Roussakis
2	December 2018	Updated from initial PIRMP format. Separated into the 'Plan' and the 'Procedure'. Updated additional information regarding chemical storage, site context etc.	James Hammond, Director 4Pillars Environmental Consulting As secondee to Aussie Industries	Emmanuel Roussakis
3	18 April 2019	Procedure tested with staff on 6 April 2019. Minor additional updates.	James Hammond, Director 4Pillars Environmental Consulting As secondee to Aussie Industries	Emmanuel Roussakis
4	5 August 2020	Procedure tested with staff on 1 August 2020. Minor additional updates. Updates to water management sections due to installation of enclosed water management system.	James Hammond, Director 4Pillars Environmental Consulting As secondee to Aussie Industries	Emmanuel Roussakis
5	2 August 2021	Procedure tested with management staff on 28 July 2021. Various updates throughout. No major changes on site.	James Hammond, Director 4Pillars Environmental Consulting As secondee to Aussie Industries	Emmanuel Roussakis
6	2 August 2022	Pollution incident training conducted. Procedure tested via desktop drill and discussion. No major changes on Site. Minor changes throughout document.	James Hammond CEO 4Pillars Environmental Consulting	Nansi Philips

7	12 June 2023	Update of PIRMP to check details and procedures. Limited test (desktop) carried out 1/6/2023 with supervisory staff). Annual training day scheduled for late August.	James Hammond CEO 4Pillars Environmental Consulting	Nansi Philips

PIRMP test record

Plan Version	Test Date	Test Type	Persons Involved	Test feedback and outcome
2	6 April 2019	Desktop	Entire Aussie Industry staff – drivers, yard, office, admin etc.	Improved understanding among staff regarding incident classes and the relevant course of action for each. Improved understanding of the availability of the PIRMP and support from the Compliance Officer. Feedback broadly positive. No major deficiencies identified.
3	1 August 2020	Desktop	Entire Aussie Industry staff – drivers, yard, office, admin etc.	Maintained understanding among staff regarding incident classes and the relevant course of action for each. Improved understanding of the availability of the PIRMP and support from the Environmental Manager. Feedback broadly positive. No major deficiencies identified.
4	28 July 2021	Desktop	Aussie Industries Management staff.	Maintained understanding among staff regarding incident classes and the relevant course of action for each. Improved understanding of the availability of the PIRMP and support from the Environmental Manager. Feedback broadly positive. No major deficiencies identified.
5	14 May 2022	Desktop	Entire Aussie Industry staff – drivers, yard, office, admin etc.	Maintained understanding among staff regarding incident classes and the relevant course of action for each. Improved understanding of the availability of the PIRMP and support from the Environmental Manager. Feedback broadly positive. No major deficiencies identified.
6	1/6/2023	Desktop	Aussie Industries Management staff.	Maintained understanding among staff regarding incident classes and the relevant course of action for each. Improved understanding of the availability of the PIRMP and support from the Environmental Manager. Feedback broadly positive. No major deficiencies identified.

Table of contents

List of Tables and Figures

Abbreviations

CEO – Chief Executive Officer or Group General Manager

EPA – Environmental Protection Authority

EPL – Environmental Protection Licence

CEO – General manager

PIRMP – Pollution Incident Response Management Plan

POM – Plan of management

SCC – Strathfield City Council

SOM – Site operations manager

Important note

This document is made up of two parts:

1. The Pollution Incident Response Management Plan (the Plan); and

2. The Pollution Incident Response Procedure (the Procedure).

The Plan provides detail regarding the legislative framework, site features, hazard identification, risk assessment, monitoring, testing, reporting and ongoing improvement. The intended audience for this part includes the Company Director(s), Chief Executive Officer (CEO), Site Operations Manager (SOM), advisors and regulatory authorities.

The Procedure provides detail on the process to be followed in the event of a pollution incident. The intended audience for this part is the people directly involved in the day-to-day operations of the site, including the SOM, site supervisors, staff and (where relevant) contractors.

All staff, at a minimum, must read and understand the Procedure, provided at Attachment A.

1. Introduction

The holder of an environment protection licence (EPL) is required to prepare and maintain a Pollution Incident Response Management Plan (PIRMP), as per Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act). This requirement was added in 2011, via the Protection of the Environment Legislation Amendment Act 2011 (POELA Act). Prior to this, licence holders were still required to notify pollution incidents that would, or were likely to, cause material harm to the environment; however, they were not required to prepare and maintain a specific plan to mitigate risk. In addition to preparing the PIRMP, the licence holder must keep a copy of the plan at the premises (Section 153D) and 'test' the plan in accordance with the Protection of the Environment Operations (General) Regulation 2009 (POEO Regulation).

The Aussie Recycling PIRMP (the Plan) works with and is complementary to:

- The Pollution Incident Response Procedure (the Procedure);
- The Plan of Management (POM); and
- The Site Safety and Environmental Rules and Site Induction.

These documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the Aussie Recycling site.

In preparing and reviewing the Plan, it is important to reiterate the definition, objectives and purpose of the Plan, as detailed in the NSW EPA Environment Guidelines: Preparation of pollution Incident Response Management Plans 2012 (the Guidelines). This serves to reinforce to all personnel, the importance and role of the PIRMP.

1.1. Definitions

As per the definition in the POEO Act dictionary, a 'pollution incident' is:

"an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise."

As per Section 148 of the POEO Act, notification of a pollution incident must occur if "*material harm to the environment is caused or threatened*". 'Material harm' is defined in Section 147 of the POEO Act 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. it 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.

2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs."

Therefore**, not all pollution incidents are notifiable**. This is made clear in the flow chart at the beginning of the Procedure.

1.2. Objectives

The objectives of a PIRMP, as set out in the Guidelines are to:

- Ensure the comprehensive and near immediate communication of a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (Strathfield Council, NSW Ministry of Health, Safework NSW, and Fire and Rescue NSW) and stakeholders within the community who may be affected by the impacts of the pollution incident);
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

1.3. Purpose

The purpose of a PIRMP is to improve the management of pollution incidents and facilitate better coordination with the relevant response agencies. The PIRMP, prepared by 4Pillars on behalf of Aussie Recycling, is to provide reference for the procedures and responsibilities for pollution incident response, and this extends to the ongoing management for the prevention and mitigation of any such incident. Together, these documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the Aussie Recycling site.

1.1. Availability of PIRMP

A copy of the PIRMP will be maintained in its written form at the licensed premises so that it is readily available for implementation and to any authorised EPA officer on request. A copy of the PIRMP will be made available on the Aussie Recycling website. If for any reason the plan is unavailable at the website and a person has made a written request the PIRMP will be provided without charge.

2. Site Details

Aussie Recycling leases the land located at 84-108 Madeline Street, Strathfield South, 2576. The land used for licensed activities is part Lot 1 of DP 556743. The PIRMP also applies to Lot 2 of DP 556743, *which includes main site office and bin storage areas. This cadastral lot is also shared by several other businesses.*

The NSW EPA has issued an Environment Protection Licence (EPL) No. 20885 for the site which allows for 'Resource Recovery' and 'Waste Storage', subject to conditions. The Development Consent (DC) (DA9899/452), originally issued by Strathfield City Council on 17 April 2000, also allows for use of the premises as a waste transfer and recycling facility for solid inert building and demolition wastes. Condition 20 of the consent stipulates that the amount of materials to be handled shall not exceed 100,000 tonnes per annum.

The site covers an area of 4,650m^2 and is zoned IN1 – General Industrial. Occupants of the land immediately north and west of the site include a truck repairer, auto wrecker, screening machinery manufacturer, and an excavation company. Cooke Park separates the site from residential neighbours to the south and east.

Further details regarding the site, including topography, hydrology, vegetation, surrounding environment and atmospheric conditions, can be found in the site's 'Plan or Management', approvals and associated documents, and environmental management plans.

3. Hazard Assessment

3.1. Description and likelihood of hazards

Although the Aussie Recycling facility is relatively site in terms of annual volumes of waste accepted, the potential for hazardous situations still exists and should not be underestimated.

Aussie Recycling undertakes activities of receiving and sorting solid inert building and demolition waste (including incidental amounts of garden waste, household waste and e-waste) and General Solid Waste soils into recyclable and non-recyclable streams.

The main hazards that are likely to cause a pollution incident are hydrocarbons, chemicals and illegal wastes. The table below provides an introductory risk assessment for pollution incidents that may occur at the site. Section 3.1 provides further detail on these hazards and their likelihood and introduces possible controls, which are expanded on in Section 3.4 (Pre-emptive actions).

Table 1: Risk Assessment for hazards likely to cause an incident at the site.

Hazard	Activity/Event	Potential Impact Type(s)[1]	Likelihood (uncontrolled)[2]	Consequence (uncontrolled)[3]	Risk Rating[4]
Hydrocarbons	Diesel tank – catastrophic failure or damage	Surface water, land, air quality, human health	Unlikely	Major	3
	Diesel tank – minor leak	Surface water, ground water, land	Unlikely	Minor	1
	Mobile plant/vehicle fuel line leak or failure	Surface water, ground water, land	Moderate	Moderate	4
	Mobile plant/vehicle – other minor spill or leak	Surface water, ground water, land	Moderate	Minor	2
	Hydro-carbon storage (container bund) - leak	Surface water, ground water, land	Unlikely	Moderate	2
	Other hydro-carbon incident – threat to surface water	Surface water, land	Moderate	Major	6
	Other hydro-carbon incident – no threat to surface water	Land, air quality	Moderate	Moderate	4
Chemical	Chemical – minor spill (< 20L)	Surface water, human health	Likely	Minor	3
	Chemical – major spill (≥20L) or immediate threat to surface water	Surface water, land, air quality, human health	Unlikely	Major	6
Illegal Waste	Illegal waste – non hazardous solid prohibited waste	Land, air quality, human health	Moderate	Minor	2
	Illegal waste – hazardous solid prohibited waste	Surface water, ground water, land, air quality, human health	Moderate	Major	6

[1] These are examples of systems or entities that may be impacted by the incident. Examples include surface water, ground water, air quality and human health. This list is not exhaustive and will vary between incidents.

[2] Qualitative categories of likelihood used for this assessment are likely, moderate and unlikely.

[3] Qualitative categories of consequence used for this assessment are major, moderate and minor.

[4] The risk rating is a numerical rating from 1 to 9 (lowest to highest), based on the likelihood x consequence.

	Illegal waste – liquid waste	Surface water, ground water, land, human health	Unlikely	Major	3
Dust	Generation of dust from material processing, stockpiles and vehicle movements	Air quality, human health	Moderate	Moderate	4
Flooding	Flooding due to heavy rains and/or failure of stormwater management system	Surface water, land, human health	Unlikely	Moderate	2

The risk ratings are based on uncontrolled likelihood and consequence of each incident and do not take into account the proactive controls outlined later in this document. Note that the descriptions for 'incident types' are broad and there are likely to be several sub-categories for each incident (refer to the Procedure for further details)

3.1.1.Petroleum Products

Description of hazard

The facility has a 20,000-litre diesel fuel storage tank which is located in the southern section of the processing shed. The bunded design should capture diesel fuel in the event of a tank breach. Mobile and fixed plant present at the site that also require diesel include waste delivery trucks, excavators, forklifts, loaders and the trommel. These items of plant are involved in transferring, placing, and processing of waste. The most likely hazard associated with the operation of this equipment is a spill from a broken oil or fuel line which would result in the petroleum product being discharged onto land and/or water.

Likelihood of an incident

The likelihood of a significant petroleum spill occurring is low. The largest quantity of petroleum product stored on the site is the diesel fuel tank, stored within the site processing area. In this location, it is not likely to be accidentally hit or damaged by vehicles moving on site. The diesel fuel tank is bunded and hence any small amount of liquid that escapes will be contained. The tank is not under pressure and therefore the rate of escape will only be moderate, except in the event of a catastrophic failure. The bund alone may not be adequate on this occasion. Failure to maintain spill kits and adequately train staff on how to respond to this type of incident could also increase the severity of potential impacts to land and/or water. Failure to regularly inspect the diesel storage tank, mobile and fixed plant for faults and leaks could furthermore increase the likelihood of this type of incident occurring.

The quantity of diesel fuel stored in the fuel tanks of the mobile and fixed plant is relatively small. If it were to escape, in most circumstances the incident would not likely to cause any significant harm to the environment or the personnel at the site, if internal response and clean up procedures were followed.

3.1.2. Chemicals

Description of hazard

Various chemicals are stored at the facility including but not limited to lubricants and oils, paints and solvents, and industrial and domestic cleaners. These are generally bunded and stored for use within the workshop area. The quantity of products used for cleaning the office and toilet areas is very small and not considered a hazard to the environment or personnel. The Aussie Recycling 'WHS Management System Manual' provides further detail on how to handle, store and dispose of hazardous chemicals to minimise the risk of adverse health effects to workers, customers, contractors and the public.

Likelihood of an incident

The likelihood of harm to human health and the environment caused by a chemical spill is low. Ensuring quality housekeeping through the storage of lubricants and oils, paints and solvents, and industrial and domestic cleaners in a

bunded area, maintenance and proper use of spill kits, regular inspections and staff training would further reduce this likelihood.

The likelihood of there being an escape of cleaning liquid is considered low. If a spill was to occur, the risk of material harm to the environment and the personnel is low. Staff are encouraged to observe safety disclaimers and instructions provided on packaging and MSDS.

3.1.3. Illegal Waste

Description of hazard

It is not uncommon for vehicles disposing of waste at a landfill to be carrying illegal waste (i.e. waste not permitted to be accepted at the facility). This type of waste can only be described as material that cannot be accepted at the licensed facility and therefore must be 'turned away'.

The illegal material could be a full vehicle load or it could consist of illegal waste mixed with permitted waste. In either instance, the entire load of waste must be treated as unsuitable and managed appropriately. Where possible and at the discretion of the CEO or their delegate, the illegal material must be separated from the approved material and taken off site. If it is not possible to separate the illegal material, the whole load must be removed from the premises.

Aussie Recycling 'Plan of Management' provides further detail on waste management procedures, including the handling of illegal wastes.

Likelihood of incident

There will be an ongoing risk that clients and public customers will attempt to bring illegal waste to the site. However, it is the responsibility Aussie Recycling, wherever possible, such material entering to the site. It is also the responsibility of the truck driver to notify the weighbridge of the type of waste they are transporting.

The other step in the detection and inspection process is at the manual sorting stage where site personnel inspect the waste to ensure it does not contain materials that cannot be accepted. Considering the checking and inspection controls in place there is a low residual risk that illegal waste will enter the site.

3.1.1.Dust

Description of hazard

The three main sources of dust generation on site are the sorting of material by fixed plant, stockpiles and mobile plant movements.

Likelihood of incident

The likelihood of dust leaving the site is low if all controls are functioning as intended, however, this could increase during extreme weather events (i.e. hot, windy days) and if the site is unattended (sprinklers are activated on a timer but can be overridden to provide addition suppression as required).

3.1.2.Flooding

Description of hazard

The site is located adjacent to Coxs Creek, which is a fully concrete lined stormwater channel that flows into the Cooks River and has an extensive urban catchment upstream of the site. The site has a fully impervious surface and runoff generally flows overland to the boundary along Coxs Creek, which has a high concrete kerb preventing runoff from entering the creek. There is a pipe stormwater system along this boundary, which includes grated inlets overlaid by geofabrics, gross pollutant traps, and an outlet chamber. Runoff ponds on the site until it gradually seeps through this system.

Likelihood of incident

The risk of flooding on-site is low if stormwater collection and conveyance systems are properly and regularly maintained. The consequences of any flooding would likely be limited to on-site (e.g. disruptions to operations, property damage, etc). Failure of stormwater collection and conveyance systems may cause pollution of receiving waters.

3.2. Inventory of pollutants

The identification, handling, storage and disposal of chemicals and hazardous substances at Aussie Recycling is guided by a series of Material Safety Data Sheers (MSDS) as set out in the 'WHS Management System Manual'. A register of all MSDS is kept in the Site Office and is readily accessible for all personnel with potential exposure to any such substances. The 'SDS hazardous substances register' which forms part of the site's IMS provides a more exhaustive list of fuels and hazardous substances stored on site.

3.3. Safety equipment

Safety equipment and devices used at Aussie Recycling to minimise risks to human and environmental health, and to contain or control a pollution include fire extinguishers, first aid kits, spill kits and bunds, Traffic control cones, barriers and signage. Regular inspections should be scheduled for these items, which should be serviced and maintained in accordance with the relevant standards and manufacturer's instructions. Regular training should also be carried out to ensure that all employees can operate the equipment.

3.4. Pre-emptive actions to be taken

The most effective method of preventing incidents occurring is to have in place an effective system of inspections and maintenance. Aussie Recycling should ensure that site inspections are carried out regularly and plant and equipment is inspected by the operators prior to the commencement of work. The checklists and inspection procedures developed for the site include:

- Regular Site Inspections;
- Vehicle and Plant maintenance records;
- Weighbridge Records;
- Excluded Waste Reports; and
- Environmental audits.

The information provided below outlines the pre-emptive actions to be taken in relation to each category of hazard.

3.4.1.Diesel fuel

Diesel fuel is stored in both the storage tank and the various pieces of operational plant. Spills of diesel fuel could occur either during the daily operation or overnight while the plant is not operational.

The main site diesel tank should be inspected daily. If the tank has an internal leak, the liquid should be collected in the bund area and pumped out by a liquid waste contractor. If the tank is determined to be faulty or damaged in any way, the fuel will be pumped from the tank and the tank removed for repair or replacement.

The plant and equipment is checked daily by the operators as part of their daily start-up and inspection routine. All plant operators are trained to check and inspect their plant and equipment before they commence work.

Should an operator find a fault with the any part on the plant, including a leaking fuel line, it is reported to the CEO or their delegate to be rectified. A leaking fuel line or other issue that may result in a hydrocarbon spill is either repaired, or replaced, as soon as practicable.

Any diesel fuel that has spilled is isolated and cleaned up. Spill kits should be located in the workshop.

3.4.2. Oil spill

Oil spills may occur due to faulty or broken hydraulic lines on mobile plant and equipment.

The plant and equipment is checked daily by the operators as part of their daily start-up and inspection routine. All plant operators are trained to check and inspect their plant and equipment before they commence work.

Any oil spill will be isolated and cleaned up using the spill kits. In the event the operator finds a faulty or broken hydraulic line, the machinery is parked up for repair, the CEO or their delegate is notified, and the fault is addressed as soon as practicable.

3.4.3.Illegal waste

All waste entering the site must comply with the conditions set out in the Environment Protection Licence. The weighbridge operator asks the truck driver for information concerning the waste being delivered to the site. The weighbridge operator records all loads of material entering the site, including waste and other operational materials. The material is again inspected by the plant operator and landfill supervisor when the material or waste is unloaded.

If illegal waste is found on the site, it is immediately isolated and steps taken to have it removed from the site and taken to an approved landfill. If the illegal waste is detected at the weighbridge, the truck is rejected from the site but not before an Excluded Waste Report is completed.

3.4.1.Dust

Dust generation will be managed by the operation and proper maintenance of the dust suppression sprinkler system, the wetting down of stockpiles, and the sweeping of trafficable, impervious surfaces while damp.

3.5. Training requirements

The objectives of the training program that is to complement this plan is to ensure that all site staff are aware of the contents of the PIRMP, such that they understand environmental and safety issues in the workplace and are aware of their responsibilities in the event of a pollution incident. Information is to be disseminated through site inductions, toolbox talks and ongoing training.

Aussie Recycling is responsible for the administration of materials and maintenance of records for all inductions and ongoing training. At a minimum, records of training will contain details of who facilitated and received the training, when the training was undertaken, and what the training involved. Where applicable, test scores and simulation outcomes should also be carefully noted.

Contractors and visitors to the site will also be subject to inductions and ongoing training as deemed appropriate by the CEO or their delegate. Details and copies of any relevant licenses, certificates and/or qualifications held by employees and contractors will also be recorded and maintained by the WHS Compliance Officer. It is the responsibility of all employees and contractors working on the site to work in a safe manner and to look after the interests of their fellow workers.

Inductions and ongoing training requirements should be routinely reviewed and revised as deemed appropriate by the WHS Compliance Officer. Throughout this process, considerations should be made for but not limited to changes in procedures and regulations, as well as any errors or deficiencies in job performance and in reporting.

Desktop simulation and pollution incident drill testing procedures, as required under Section 98(E) of the POEO Regulation and outlined in Section 0, provide an interactive training experience for employees. Scenarios are designed to be reflective of an incident that may be encountered on site, however, are implemented in a controlled and hazard free environment.

3.6. Minimising harm to persons on the premises

The best and most effective method for minimising harm to all persons on the premises, including employees, visitors and subcontractors, is through education, training and provision of appropriate resources to control hazards. All persons working on the site, employees and subcontractors, and persons visiting the premises, are required to attend an induction programme. All employees and regular subcontractors must attend the regular toolbox meetings, where they are openly encouraged to raise issues of concern. Employees, sub-contractors and visitors will be provided with and instructed on the appropriate personal protective equipment.

Minimising harm also comes through development and training programmes which employees are encouraged to commit to. Training often takes the form of on-the-job training of employees in the use of plant and equipment as well as reinforcement of the various management plans and systems in place.

Aussie Recycling only employ people who are experienced in recycling operations and have qualifications for the plant they operate. While training and development are essential, appropriate signage is also important. Given the operation of heavy machinery, clear directional and safety signs are important.

Aussie Recycling employees and sub-contractors will be instructed to contact the Site Operations Manager immediately if they are in doubt over any part of this PIRMP or their responsibilities.

3.7. Maps

Figure 1 shows the site in the context of surrounding land uses. This map should be used to identify which land users are likely to be most sensitive to different types of pollution incidents. Figure 2 provides a satellite image, with key site features marked. This plan is consistent with the plan provided to the NSW EPA and is referred to in the site licence.

4. Actions to be taken during and after an incident

4.1. During an incident

Important note: The Pollution incident response procedure contains a simple flow chart, for use when a pollution incident occurs. The Procedure also contains all relevant contact details for authorities and other stakeholders. The CEO must identify which incident response procedure is best aligned with the one at hand and respond accordingly. Variations to the recommended response detailed in the critical information summary may be authorised and carried out at the discretion of the CEO or Company Director. The Procedure is provided as Attachment A to this Plan. This section provides a high-level overview of the procedure.

Any employee or contractor who suspects or confirms that a pollution incident has or is about to occur, shall immediately notify the relevant supervisor or the CEO. If the employee is trained to respond to the incident, they may do so, provided that someone else is on hand to raise the alarm. Supervisors should notify the CEO or their delegate of the incident immediately.

The CEO or their delegate must notify the Company Director if there is a risk of material harm to the environment, if there is an immediate risk to human health or property (on or off-site) or risk to environmental amenity (off-site). Section 148 of the POEO Act states relevant regulator(s) and management authorities must also be notified if there is a risk of material harm to the environment. Stakeholders may also need to be notified of an incident; however, this is at the discretion of the Company Director (unless it is required by the regulator or relevant management authority). Information that should be provided to the EPA, or other regulators, includes:

- the time, date, location, nature and duration of the event;
- location of the place(s) where pollution is occurring or is likely to occur;
- nature, quantity and concentration of any pollutants involved;
- suspected cause of the incident;
- actions taken to control the situation;
- actions taken to mitigate any environmental harm and/or environmental nuisance caused by the event; and
- proposed action(s) to prevent a recurrence of the event;
- any other information that may be requested by regulatory authorities.

4.2. Post-incident

4.2.1.Internal reporting

A ‘post-incident report’ is to be completed by all staff involved in a pollution incident, and forward the report to the CEO or their delegate prior to leaving the site that day. Employees involved in a pollution incident are not permitted to leave the

site unless approved to do so by Southland Waste management, or a representative of the Emergency Services (if in attendance).

The CEO or their delegate is responsible for ensuring that all required information has been collected, and that all concerned parties have completed a report. The CEO or their delegate must also complete a separate 'post-incident report', before forwarding these reports to the Company Director (except in the event of a 'non-notifiable incident'). A hard and soft copy each post-incident report is to be retained.

4.2.2.External reporting

The CEO or their delegate will prepare a report that satisfies regulator reporting requirements in a timely manner following a regulator-notifiable incident or stakeholder-notifiable incident. Once this report has been reviewed and approved by the Company Director, it is to be forwarded to the EPA, other relevant regulators and management authorities on behalf of the company. This is to occur within the timeframes set out by the relevant regulators. Any follow up information requested by the regulator(s) is to be authorised by the Company Director and provided in a timely manner.

4.3. Review and update the PIRMP

Following any incident (other than a non-notifiable incident), the PIRMP must be tested (and revised if necessary), as per Regulation 98E(2b) of the POEO Regulation. Testing of a PIRMP following an incident must assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner. If the answer to this is 'no', then the PIRMP must be revised to address any gaps or deficiencies identified.

5. Responsibilities and Contact Information

The following section presents a brief outline of key positions and responsibilities associated with implementation of the PIRMP at Aussie Recycling.

Overall site management and compliance, as well as the implementation, testing, training and reviewing the effectiveness of the PIRMP is the responsibility of the CEO or their delegate, with assistance from advisory managers, employees and regular contractors. The CEO or their delegate will ensure that all employees read and understand the Procedure and have been adequately inducted and trained. The CEO or their delegate will also ensure all relevant persons are re-trained if the PIRMP is altered in a substantial way

Employees, contractors and visitors inducted to the site accept a duty of care and the responsibility to ensure that any accidents, incidents, and near misses are reported through the correct channels. During an emergency or incident, they are obligated to follow procedures and authorised instruction, provided this does not place them at any additional risk. As such, they must commit to understanding the PIRMP and emergency plans.

Regulator notification of any pollution incident causing or threatening to cause material harm is required under Section 140 of the POEO Act. The notification protocol described below should be enacted as soon as practicable after any person on the premises becomes aware of the incident. Firstly, call '000' if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders. Following this, or if the incident does not require any of these agencies to control or contain the incident, notify the relevant authorities as shown in Table 2. Contact details for other relevant persons and organisations are summarised in Table 3.

Table 2 - 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)

Table 3 - 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

6. PIRMP Maintenance and review

6.1. Testing the PIRMP

As per Regulation 98(E) of the POEO Regulation, a PIRMP must be tested routinely every 12 months. The testing must be carried out in a manner as to *"ensure that the information included in the plan is accurate and up to date and that the plan is capable of being implemented in a workable and effective manner"*. The PIRMP may be tested in a variety of ways, including basic review, desktop simulation and practical exercises or drills. Testing must cover all aspects of the plan, including the effectiveness of training. Plans must also be tested within one month of any pollution incident occurring in the course of an activity and to which a licence relates. This post-incident test must assess whether the information contained in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Plans must include all relevant details in regards to:

- the manner in which the PIRMP is to be tested and maintained;
- the dates on which they have been tested and the name of the staff members who carried out the testing;
- the dates on which they are updated or revised.

6.2. Testing procedures

Testing of the PIRMP may occur as a desktop simulation or a pollution incident drill. Once the test is complete, it will be followed by a PIRMP review. Any issues identified during the test will be rectified during the subsequent revision of the plan. The decision on which testing procedure to use is at the discretion of the CEO or their delegate. The decision will take into account prior performance, the occurrence of any incidents in the preceding period, substantial changes in regulatory frameworks and other relevant matters.

6.2.1.Desktop simulation

Responsibility for implementation: CEO or their delegate.

Procedure: The procedure for a desktop simulation is as follows:

i. The CEO or their delegate assembles all relevant personnel in the office;

ii. The CEO or their delegate identifies a type of 'Regulator notifiable incident' or a 'stakeholder-notifiable incident' (i.e. risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e. sediment-laden water overflow, leachate escape to soil/groundwater or illegal waste dumping incident with hazardous vapours). The employee is the person who has identified the hypothetical incident;

iii. Using the procedures outlined in the PIRMP, the persons present move through the steps in the process, documenting what action is taken at each step;

iv. At the end of the process, the persons present discuss the incident response and identify any weaknesses or deficiencies in the PIRMP process that were identified;

v. The CEO or their delegate is to document the desktop simulation, minute the debrief discussion and raise remedial actions for any deficiencies identified in the process.

6.2.2. Pollution incident drill

Responsibility for implementation: CEO or their delegate

Procedure: The procedure for a pollution incident drill is as follows:

i. The CEO or their delegate identifies a type of 'Regulator notifiable incident' or a 'stakeholder-notifiable incident' (i.e. risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e. sediment-laden water overflow, leachate escape to soil/groundwater or illegal waste dumping incident with hazardous vapours) (it should be different to the scenario that will be used in the desktop simulation;

ii. The CEO or their delegate then instructs an employee to commence the simulation at an unspecified time on a specified date (the CEO or their delegate may suggest an approximate time, but the employee should determine when to commence the drill);

iii. The employee commences the drill by notifying their supervisor of the (pre-determined) incident; iv. The supervisor must then commence the process outlined in the PIRMP that is relevant to the particular incident (including identifying the immediate response required);

v. The CEO or their delegate is to contact the Company Director and notify them that they have been contacted for the purposes of a drill, but no actual notification of external parties is required (although, it should be documented which external parties *would* be notified in a real pollution incident scenario);

vi. All parties involved in the drill will meet following the conclusion of the drill to debrief and discuss the process and any deficiencies identified in the process. This should also include a review of how prepared and well-equipped persons were to immediately respond to the incident, where relevant (i.e. was appropriate spill control equipment available for a spill incident?);

vii. The CEO or their delegate is to document the drill, minute the debrief discussion and raise remedial actions for any deficiencies identified in the process.

1.1.3. PIRMP Review

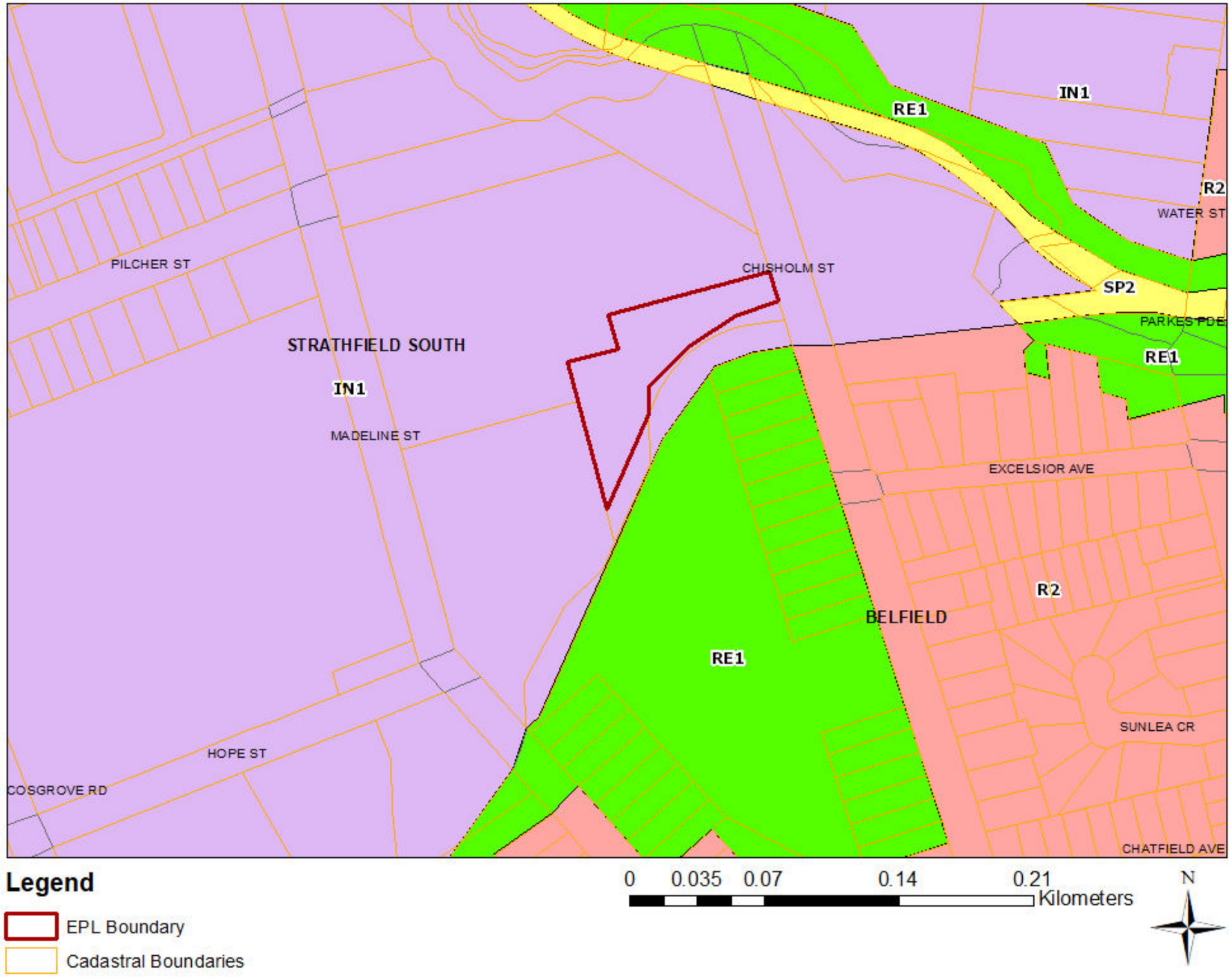
Responsibility for implementation: Environment and Community advisor and CEO or their delegate

Procedure: A basic review of the PIRMP will involve the CEO, or relevant delegate (i.e. E&C Advisor) conducting a review of all information in the plan, paying particular attention to the following elements: i. Contact details;

i. Regulatory/legislative context;
ii. Relevant hazards;
iii. Hazard inventory;
iv. Site safety equipment;
v. Training provisions (training records should also be inspected to gauge compliance); and vii. Site details (including maps and other diagrams).

The document is to be revised and re-issued following the review. The CEO or their delegate must ensure that all relevant persons are re-trained in the PIRMP following the review, with a particular focus given to sections that have been changed.

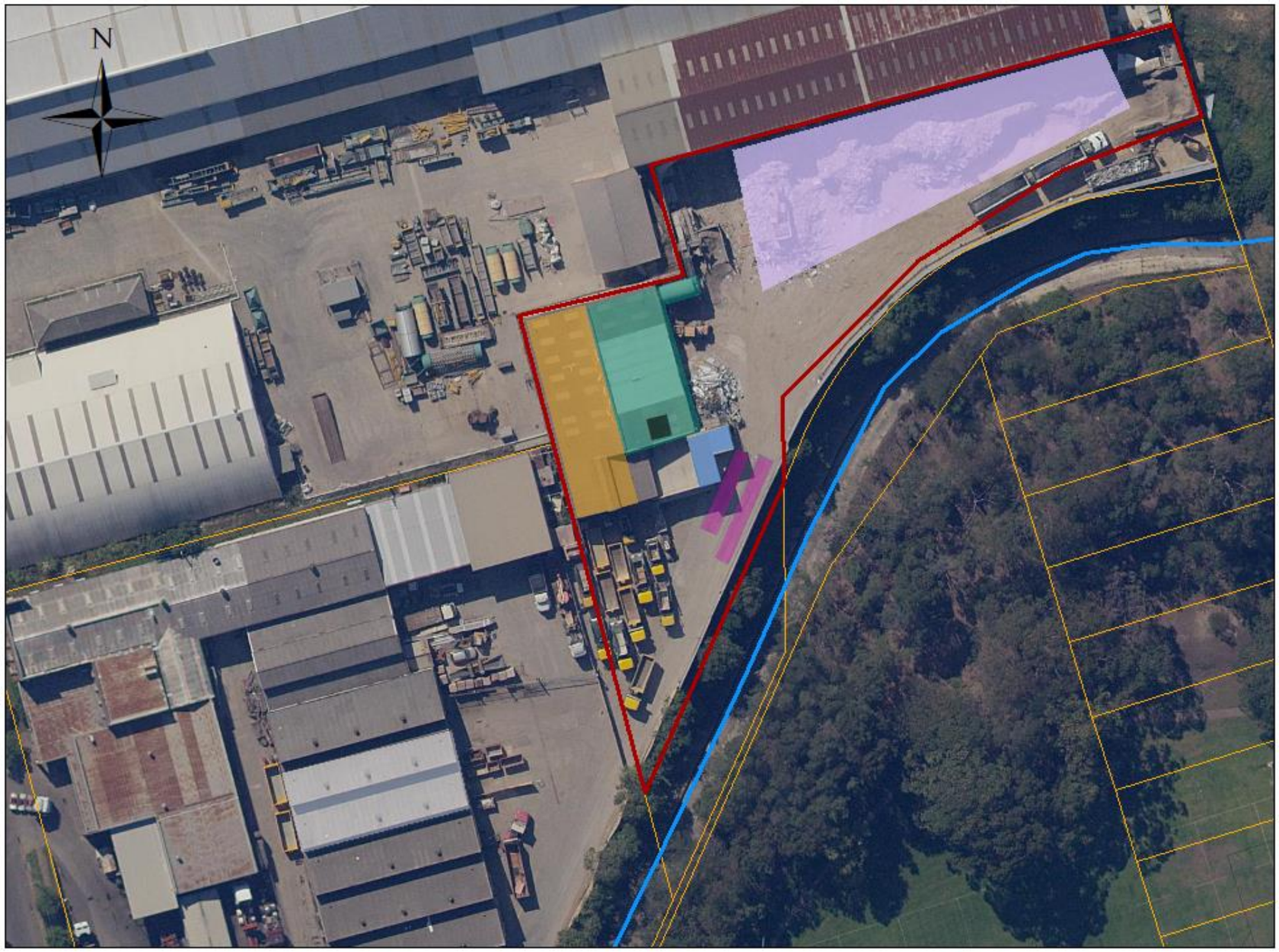
Locality plan with land use types



Drawn by:	EL	Report reference: Aussie Recycling PIRMP	Key:	Green: RE1 | Pink: R2 | Purple: IN1
		Source: © Department Finance, Services and Innovation (April 2019)		

Figure 1: Locality plan for the site, showing nearby land zoning.

Site layout



Drawn by:	JH	Report reference: Aussie Recycling PIRMP	Key:	NA
		Source: © Department Finance, Services and Innovation (April 2019)		

Figure 2: Site plan, showing the location of key hazards identified in this Plan.

Attachment A