



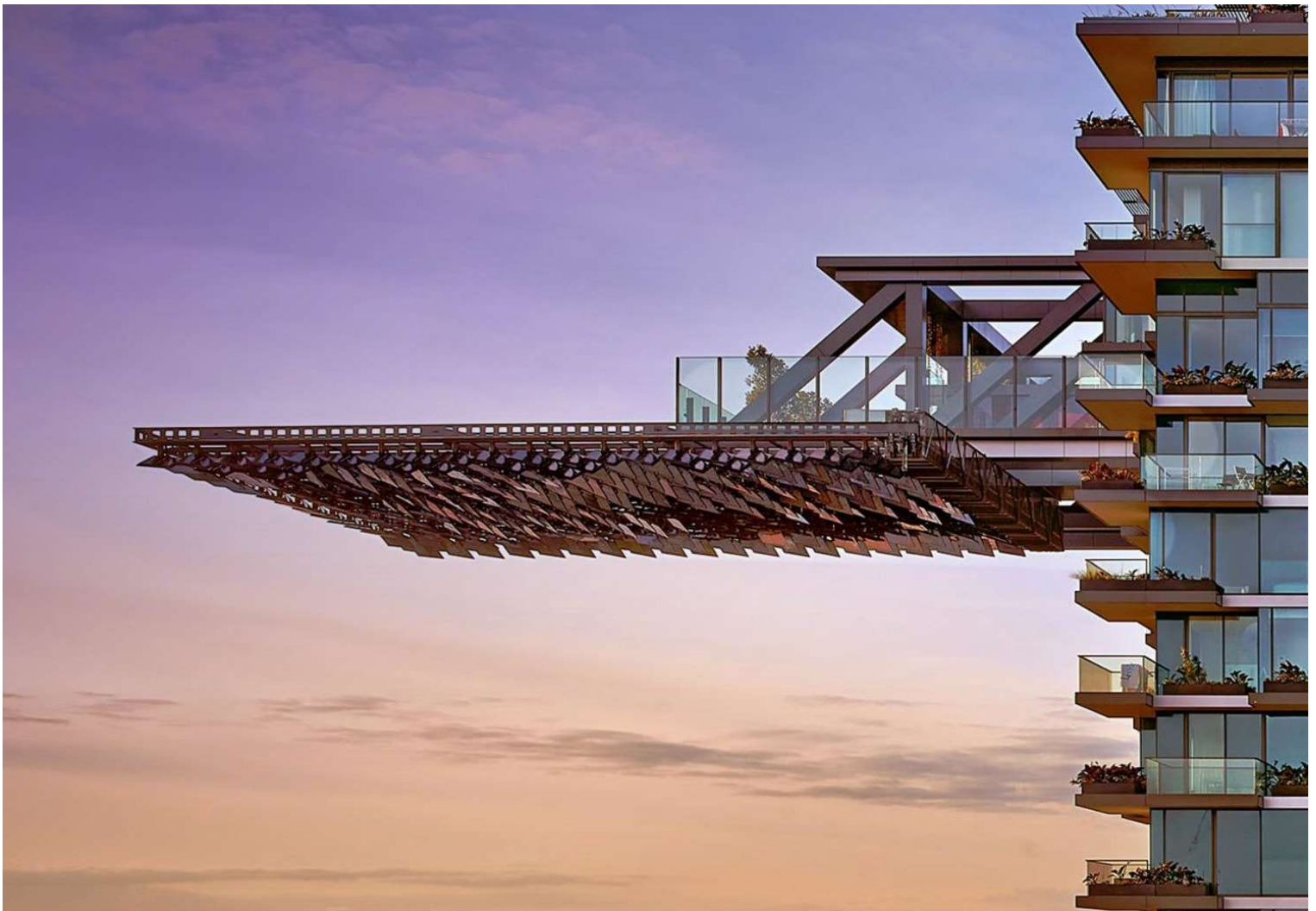
InfraBuild
Building futures through sustainable steel



Pollution Incident Response Management Plan

EPL 2270

InfraBuild Recycling
79 Stephen Road, Botany, NSW, 2019



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1.0 Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy the obligations under Part 5.7A of the *Protection of the Environment Operations Act 1997 (POEO Act)* and the associated requirements of the *Protection of the Environment Operations (General) Regulation 2022*, for licensed facilities.

Under the **InfraBuild** Recycling Site Emergency Response Plan, detailed emergency response procedures are already in place for the classification and management of incidents across **InfraBuild** Recycling operational sites. In accordance with the PIRMP requirements in section 153A and related provisions (sections 153C–153F) of the POEO Act and Chapter 4 of the General Regulation (2022), to allow for the integration of requirements into existing plans in respect to pollution incidents response, requirements under POEO Legislation have been integrated into this existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2.0 Scope

This PIRMP covers **InfraBuild** Recycling Botany site. This plan applies to all activities, products and services on the site which **InfraBuild** Recycling has operational control.

3.0 Legislative Requirements

Specific legislative requirements for the development and implementation of this PIRMP are provided in the following table.

Part 5.7A of the <i>Protection of the Environment Operations Act 1977 (POEO Act)</i>
Chapter 4 of the <i>Protection of the Environment Operations (General) Regulation 2022</i>
Environmental Legislation Amendment Bill 2025
Environment Protection Licence (EPL) 2270

4.0 Terms and Definitions

4.1 Definition of a pollution incident

A pollution incident means an incident or set of circumstances during or as a consequence of which there 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.

4.2 Abbreviations

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5.0 Notification of a Pollution Incident

5.1 What must be notified

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined under 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 or an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations) and
- b) Loss includes the reasonable cost and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

5.2 Responsibility to notify

Under Section 148 of the POEO Act the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity
- An employee or agent carrying on the activity
- An employee carrying on the activity
- The occupier of the premises where the incident occurs

Once determined that the incident causes or threatens material harm to the environment, notifications must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

5.3 Emergency Response

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and NSW Ambulance Service should be contacted first for emergency assistance (phone 000). The other agencies must still be contacted after that to satisfy notification obligations.

6.0 Reference Documentation

Document No.	Document
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan
IBR-WHSE-RM-PRO-037	Emergency Preparedness and Response Procedure
OSTR-OHDR-ENV-TOOL-018	Botany Dust Management Plan

7.0 Botany PIRMP

7.1 Description of Potential Hazards

An *environmental hazard* is a term for any situation or state of events which poses a threat to the surrounding environment. Incident types and associated hazards are detailed in the following sections of ERPs.

Document No.	Document	Environmental Hazard	Reference
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan	Fire/Explosion	Page 9
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan	Severe Weather Events	Page 10
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan	Chemical Spill or Leak	Page 15

UNA-OHSE-RM-TOOL-021	Botany Emergency Response Plan	Stockpile Fire	Page 19
OSTR-OHDR-ENV-TOOL-018	Botany Dust Management Plan	Dust	

7.2 Pre-emptive Actions to be Taken

Minor Chemical Spill/Leak

Medium quantities of chemicals are stored onsite and any major maintenance activities are undertaken by third party contractors.

Chemicals are stored with the appropriate bunding, and spill kits are located in areas where there is potential for a spill to occur including:

- Oil store
- Plant fuelling station

Stockpile Fire/Fire/Explosion

With the receipt of different types of metals on site including motor vehicles these are stored on site in separated areas.

Appropriate firefighting equipment is installed in the appropriate area.

Dust Generation

InfraBuild Recycling has in place a Dust Management Plan to assist in the reduction of dust leaving the site.

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- The implementation of **InfraBuild** Recycling Environmental Management System (EMS)
- Onsite inductions for employees, contractors and suppliers
- Annual environmental audit

7.3 Inventory of Potential Pollutants

There are no underground storage facilities at the **InfraBuild** Recycling Botany site.

The following chemicals are stored on the **InfraBuild** Recycling Botany site.

Chemical storage locations are detailed on Appendix 1.

Oils/Fuels/Grease	Quantity
Lead Acid Batteries	100 tonnes
Hydraulic Oils	2000 lts
Diesel Fuel	10000 lts
Renoclean Degreaser	200 lts

7.4 Safety Equipment

Under **InfraBuild** Recycling’s Safety Management Program GOAL 0 ZERO minimum Personal Protective Equipment (PPE) requirements are in place for all employees, contractors, visitors and transport operators in operational areas. Minimum PPE includes high visibility clothing (long sleeved shirt, long trousers) enclosed safety footwear, hard hats and safety glasses. Other onsite safety-related equipment includes:

- Onsite safety inductions for all employees
- Onsite safety sign-in and inductions for all contractors and visitors
- Emergency stops
- Evacuation alarm points
- Chemical wash stations
- Spill kits (refer Section 7.2)
- SDS Register
- Appropriate process and chemical identification signage
- First aid facility and first aid kits

7.5 Notification Procedure and Contract Details

Incident notification is identified under the following sections of existing ERP.

Document No.	Document	Reference
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan	Page 9
BOT -OHSE-RM-TOOL-021	Botany Emergency Response Plan	Page 15
BOT -OHSE-RM-TOOL-021	Botany Emergency Response Plan	Page 19

In response to requirements under changes to 5.7 of the POEO Act regarding pollution incident notifications, the following specific information and contact details are provided for **InfraBuild Recycling Botany** site in the event of an environmental incident.

Excerpt from EPA website – Protocol for Industry Notification of Pollution Incidents

<https://www.epa.nsw.gov.au/reporting-and-incidents/report-pollution/contacts-chemical-radiation-pollution/notification-protocol>

Recent changes to Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specify new requirements relating to the notification of pollution incidents.

The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution 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, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- the appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) – the local authority is a local council of an area under the Local Government Act 1993), the Lord Howe Island Board for Lord Howe Island, or the Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council)
- the EPA, if it is not the ARA – phone Environment Line on 131 555
- the Ministry of Health via the local Public Health Unit – see www.health.nsw.gov.au/publichealth/infectious/phus.aspx
- SafeWork NSW (formerly Workcover) – phone 13 10 50
- the local authority if this is not the ARA

The appropriate contact for the relevant local authority and Public Health Unit will vary. All necessary contact numbers should be found in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers should also be identified in the Pollution Incident Response Management Plan prepared for the premises.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by Safework NSW.

If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the **InfraBuild Recycling Botany** site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures.

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, as they are responsible for controlling and containing incidents. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

- The appropriate regulatory authorities (ARA)
- The EPA; if it is not the ARA
- The Ministry of Health via the local Public Health Unit
- SafeWork NSW
- The local authority if this is not the ARA
- Fire and Rescue NSW

Complying with these notification requirements does not remove the need to comply with any other obligations for notification, for example, those that apply under other environmental protection legislation or legislation administered by SafeWork NSW.

7.5.1 Internal Notification Contact Details

Contact Position	Contact Name	Contact Details
Branch Manager and Trading Account Executive	Steve Seremel	0437 823 523
NSW Operations Manager	Scott Reisenleiter	0413 000 672
NSW State Manager	Scott Studdon	0412 265 000
National Environment Manager	Pablo Garces	0455 421 181

7.5.2 External Notification Contact Details

Authority	Local Authority	Contact Details
Fire and Rescue NSW		000
NSW Environment Protection Authority	(Pollution Hotline)	131 555
NSW Ministry of Health	Prince of Wales Hospital	(02) 9382 2222 (ask for Public Health Officer on call)
SafeWork NSW		131 050
Local Council	Bayside City Council	1300 581 299

7.5.3 Immediate Neighbour Notification Contact Details

Immediate Neighbour	Contact Details
California Collision Centre	(02) 9700 1313
Price & Speed (Depot Three)	(02) 9666 6565
Grayking Interior Supply	(02) 9666 6688
Advance Timber Finishing	(02) 0666 9184
Replacement Car Keys Sydney	0450 227 539
Expeditors Sydney	(02) 9695 6400
Residential properties along Stephen Road	Door-knock notification

7.6 Communication with Local Community

7.6.1 Communication

Communication and updates regarding incidents will be undertaken in accordance with existing procedure as detailed in existing ERPs. In the event of a notifiable incident, the appropriate emergency response plan and associated external communication process will be deployed.

7.6.2 Immediate Neighbours

In response to the introduction of changes to 5.7 of the POEO Act and as part of this PIRMP, in the event of a notifiable incident, and dependent upon the nature and scale, immediate neighbouring properties will be notified under the direction of Emergency Services with immediate response information.

7.6.3 InfraBuild Recycling Site Details

InfraBuild Recycling operates a telephone complaints line for the purpose of receiving complaints from members of the public in relation to activities conducted at the site.

Phone: 0455 421 181

Website link: www.infrabuild.com/sustainability/complaints-handling/

7.7 Minimising Harm to Persons on Premises

At all times minimising harm to persons shall be a priority. In addition to information provided in Sections 7.2 and 7.5 detail of evacuation assembly point is provided in Appendix 2.

7.8 Actions to be taken during or immediately after a pollutant incident

Internal incident management procedures, including the Notification and Escalation and ERPs provide detailed procedure as to immediate action to be undertaken during or immediately after an incident, dependent upon type and classification.

Document No.	Document
BOT-OHSE-RM-TOOL-021	Botany Emergency Response Plan
IBR-WHSE-SYS-PRO-029	Incident Reporting and Investigation Procedure

7.9 Training and Testing of the Plan

Incident Reporting and Emergency Preparedness Procedures detail internal and external plan implementation requirements. My learning details training requirements.

Testing of the plan in the form of simulated exercises including frequency and type is also detailed.

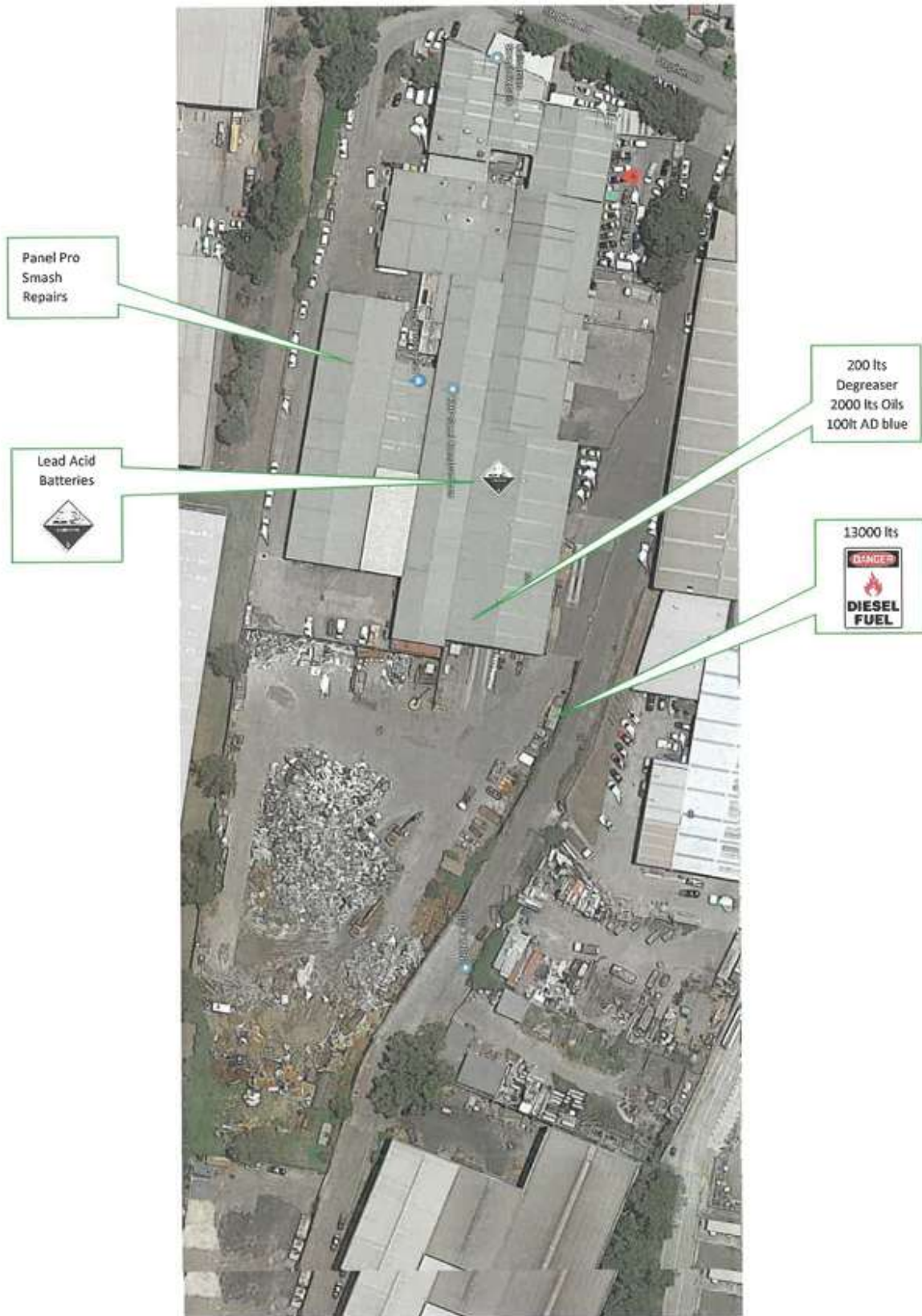
Document No.	Document
IBR-WHSE-SYS-PRO-029	Incident Reporting and Investigation Procedure
IBR-WHSE-RM-PRO-037	Emergency Preparedness and Response Procedure

8.0 Review History

Version No.	Date	Amendments
V.1	05/01/2018	Original
V.1.1	14/01/2019	Minor amendments, removal of Liberty OneSteel Recycling and replace with Liberty Recycling.
V.1.2	26/07/2019	Minor amendments, removal of Liberty Recycling & replace with InfraBuild Recycling.

V.1.3	25/07/2021	Amend quantities of diesel fuel and hydraulic oil in 7.3
V.2.0	24/10/2022	Update Immediate Neighbour Notification Detail
V.2.1	07/03/2024	Update oil quantities and add AD Blue quantity
V.2.3	20/09/2024	Amend internal notification contact details
V.3.0	30/01/2026	Update of Environmental Legislative framework. Update of internal contact details and immediate neighbour list.

Appendix 1 – Facility DG Map



Appendix 2 – Evacuation Assembly Area



InfraBuild Recycling

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Botany NSW 2019

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