



InfraBuild



Pollution Incident Response Management Plan

EPL 4414

InfraBuild Recycling
Lot 5 243 Berkeley Road, Unanderra NSW 2526

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1.0 Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy the obligations under the Protection of the Environment Operations Act 1997 (POEO Act) and associated Protection of the Environment Legislation Amendment Act 2011 (POLEA Act) for licensed facilities.

Under **InfraBuild** Recycling Site Emergency Response Plan, detailed emergency response procedure is already in place for the classification and management of incidents across **InfraBuild** Recycling operational sites. Under the provisions of Part 3A 98B(2) of the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO Legislation have been integrated into these 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 Unanderra 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 *Protection of the Environment Operations Act 1977 (POEO Act)*

Part 5.7A of the *Protection of the Environment Legislation Amendment Act 2011 (POLEA Act)*

The *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*

Environment Protection License (EPL) 4414

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
POLEA Act	Protection of the Environment Legislation Amendment Act 2011
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 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 \$10,000 (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, ie. 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
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan
OSTR-OHSE-RM-PRO-037	Emergency Preparedness and Response Procedure

7.0 Unanderra 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	Reference
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 9
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 15
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 18

Potential environmental hazards specific to **InfraBuild** Recycling operations include:

- Minor chemical spills leaks
- Stockpile fire
- Dust generation
- Water pollution

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

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.

Water Pollution

InfraBuild Recycling has in place a fully maintained storm water treatment system to treat storm water runoff from operational area.

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 Unanderra site.

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

Chemical storage locations are detailed on Map 1, Appendix 1.

Oils/Fuels/Grease	Quantity	Reference
Renoclean Degreaser	200 lts	D.G.1 Appendix Map 1
Hitachi Engine Oil HD-1	200 lts	D.G.2 Appendix Map 1
Hitachi Hydraulic Oil	200 lts	D.G.3 Appendix Map 1
Diesel Fuel	33,000 lts	D.G.4 Appendix Map 1
Diesel Fuel	2500 lts	D.G.4 Appendix Map 1
Hitachi EPN02 GRease	20 kgs	D.G.4 Appendix Map 1
Renolit EP00 Grease	40 kgs	D.G.5 Appendix Map 1

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
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 9
UNA -OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 15
UNA -OHSE-RM-TOOL-021	Unanderra Emergency Response Plan	Page 18

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 Unanderra** 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*
- *Fire and Rescue NSW – phone 000*

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 Unanderra** 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
Operational Support Manager	Roger Baines	0407 580 210
General Manager Recycling Australia	Chris Morgan	0417 218 074
National Operations Manager	Adam West	0419 975 189
NSW Operational Manager	Scott Studdon	0412 265 000

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	Illawarra Health Glendon Lee	(02) 4221 6700
SafeWork NSW		131 050
Local Council	Wollongong City Council	(02) 4227 7111

7.5.3 Immediate Neighbour Notification Contact Details

Immediate Neighbour	Contact Details
Wideform Pty. Ltd.	(02) 4224 0300
Murrell Freightlines	(02) 4272 7220
Bondi Designs Bathroom Supplies	(02) 4271 2444
Bluescope Steel Welding Products	(02) 4272 2544

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.

The number is (02) 9203 1627

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 Map 2 Appendix 1.

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
UNA-OHSE-RM-TOOL-021	Unanderra Emergency Response Plan
OSTR-OHSE-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
OSTR-OHSE-SYS-PRO-029	Incident Reporting and Investigation Procedure
OSTR-OHSE-RM-PRO-037	Emergency Preparedness and Response Procedure

8.0 Review History

Version No.	Date	Amendments
1	08/06/2018	Original
1.1	03/01/2019	Minor amendments, removal of Liberty OneSteel Recycling and replace with Liberty Recycling
1.2	26/07/2019	Minor amendments, removal of Liberty Recycling and replace with InfraBuild Recycling

Appendix 1 – Map 1 Facility Map

Appendix 2 – Map 2 Evacuation Assembly Area



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