

Pollution Incident Response Management Plan

81-85 Christie Street, St Marys, NSW

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1.0 Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to ensure compliance with our obligations under the Protection of the Environment Operations Act (POEO), but more importantly to provide clear direction to the employees and contractors of Tyrecycle about how to manage and respond to any pollution incidents that may occur.

If a pollution incident occurs and material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

Copies of this plan are kept at 81-85 Christie Street, St Marys and online at www.tyrecycle.com.au.

2.0 Scope

This document applies to all activities, products and services conducted at 81-85 Christie Street, St Marys, NSW over which Tyrecycle has operational control.

The Tyrecycle integrated HSEQ management system has other emergency preparedness and response processes in place that overlap with and complement elements of this document.

3.0 Legislative Requirements

- Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (Waste) Regulations 2014
- Protection of the Environment Operations (General) Regulation 2009
- Contaminated Land Management Act 1997
- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2017
- Environment Protection Licence 13217

4.0 Internal References

- PR600 Emergency Response Procedure
- PR602 Incident Management Procedure

5.0 Terms and Definitions

TERMS	
EMS	Environmental Management System
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
HSEQ	Health, Safety, Environment, Quality
PIRMP	Pollution Incident Response Management Plan
POELA Act	Protection of the Environment Legislation Amendment Act
POEO Act	Protection of the Environment Operations Act

DEFINITIONS	
Pollution Incident	A pollution incident is material harm to the environment which requires immediate notification.
Material Harm to the Environment	Actual or potential harm to ecosystems or to the health or safety of people that is not trivial; or Has cause or may potentially cause more than \$10,000 property damage or clean-up costs.
Immediate Notification	Promptly and without delay, after the person becomes aware of a pollution incident; as soon as it is safe to do so; and not as to delay immediate actions to ensure the health and safety of people or to contain a pollution incident.
Environmental Hazard	Any situation or state of events which poses a threat to the surrounding environment.

6.0 Environmental Protection Licence (EPL) Details

Name of licensee:	Tyrecycle Pty Ltd
EPL Number:	13217
Premises name and address:	81-85 Christie St, St Marys NSW 2760
Website address:	https://www.tyrecycle.com.au/
Scheduled activities on EPL:	This license allows for the storage of 795 tonnes of waste tyres (T140) at any one time and an annual throughput of 50,000 tonnes.
Fee based activities on EPL:	N/A

7.0 Potential Environmental Hazards

7.1 Identification of Potential Hazards

The site at Christie Street, St Marys is used for recycling end of life tyres, primarily by shredding. Table 1 below identifies the main hazards to human health and/or the environment associated with Tyrecycle St Marys's operations.

Table 1

Identified Hazard	Residual Risk	Likelihood
Air Pollution Incident		
Dust	Low	Very Low
Smoke / Fire	High	Low
Water Pollution Incident		
Oil Spill	Very Low	Very Low
Chemical Spill	Low	Very Low
Battery Acid Spill	Low	Very Low
Tyre Shred Contamination	Low	Low
Fire Wash Water	High	Low
Washing of Trucks	Very Low	Very Low
Noise Pollution Incident		
Tyre shredding processes and mobile plant operation	Very Low	Very Low
Land Pollution Incident		
Fire	High	Low
Oil / Chemical Spill	Low	Very Low

7.2 Pre-Emptive Actions

Table 2 provides a description of the control measures taken to minimise or prevent harm to human health and/or the environment associated with Tyrecycle St Mary's operations.

Table 2

Identified Hazard	Control Measures
Noise	See Air Noise Vibration Assessment (Completed October 2017)
Oil Filter Spill	<ol style="list-style-type: none"> 1. Oil filters are pre-drained by the customer prior to collection to reduce residual volume. 2. Oil filters are stored in containers that are stored on undercover bunds. 3. Spill kits are available, and employees are trained to use them. 4. Regular collections are arranged to ensure that minimum levels are kept on site at all times. 5. Induction training modules (employees and contractors); Collection SWMS; Collection Truck Training Module; Truck audits
Battery Acid Spill	<ol style="list-style-type: none"> 1. Batteries are stored on bunds, undercover until plastic wrapped and collected by contractor. 2. Limits placed on stacking to max 2 batteries high. Spill kit and eyewash facility available if a spill or leak does occur. 3. Regular weekly collections to minimise stock at all times. 4. Training to ensure staff adhere to procedure. 5. Audits and inspections for monitoring and review.
Tyre Shred Contamination	<ol style="list-style-type: none"> 1. Shred is stored on a dedicated area of hardstand in the yard, surrounded by concrete blocks to ensure product quality for customers. 2. Shred is loaded from storage area directly into shipping containers. Any product that leaves the area is routinely picked up/raked up. 3. The stormwater captured from yard runoff is channelled through the Humeceptor.
Dust	<ol style="list-style-type: none"> 1. Dust caused by wind and truck movements is suppressed by steel plates placed to cover unsealed areas of the yard. 2. Periodic application of water during drier and winder conditions is also used to suppress dust. 3. A speed limit of 8 kph is imposed to minimise the dust raised by truck and plant movements around the yard. 4. See Air Noise Vibration Assessment (Completed October 2017)

Fire (Air, Water & Land contamination)	<ol style="list-style-type: none"> 1. Fire Prevention: Pre-employment arson checks; site security; CCTV; ignition sources assessed & managed; hot work permit system; site induction; emergency preparedness drills; worker training; cleaning schedule; housekeeping observations; waste storage observations; chemical storage observations; internal & external audits 2. Fuel loads: Pile dimensions; stock management plan. 3. Fire spread: Pile & boundary separation; mobile plant; 4. Fire suppression: Adequate & effective hydrants; hose reels; sprinklers; extinguishers; emergency service access. 5. Water containment: Site kerb & channel in place; interceptor pits; stormwater discharge isolation valve. 6. Mobile plant onsite to separate tyres on fire from the rest of the pile.
Chemical Spill	<ol style="list-style-type: none"> 1. Oils, grease, coolants stored on bunds in the maintenance shed, undercover to prevent rainwater entering. 2. Correct disposal of waste as required. 3. Spill kits stocked and located nearby in the event of a spill or leak. Information and education. 4. The storm water system drains to an interceptor and isolator valve. 5. Routine inspections, observations and audits conducted as per IPI table to monitor and verify. 6. Flammable products stored in flameproof, banded cabinet.
Truck Wash Waste Water	All trucks are either taken off-site to a suitably equipped facility for cleaning, or a mobile vehicle washing contractor comes to site. In that situation, all wash water generated is captured and recovered by the contractor and taken off-site.

Potential environmental hazards have undergone a risk assessment process, whereby measures have been identified to minimise or prevent any risk of harm to human health or the environment. This process is completed live using a cloud-based integrated management system and can be found at www.skytrust.com.au

8.0 Inventory of Pollutants

Table 3 below provides an inventory of potential pollutants kept at Tyrecycle's St Mary's facility. Specific chemicals can be found in the St Marys Chemical Register, located within Skytrust; at each chemical storage location; and in the emergency information box at the front gate. Access to electronic copies of Safety Data Sheets are at each relevant storage location.

Table 3

Potential Pollutant	Maximum Quantity
Diesel	250L
Chemicals	Minor quantities (max 200L) of Class 3 Flammable Liquids, including oil-based fuels, used for plant and equipment operation.
Chemicals	Minor quantities (max 1000L) of lubricants, grease and hydraulic oils, used for plant and equipment storage
Battery Acid	Max 100L
Waste Oil from Filter Storage	Max 100L

9.0 Safety Equipment

In order to minimize risks to human health or the environment and to contain or control a pollution incident, the site Emergency Response Plan includes the use of the following (see Appendix Two & Three for locations);

- Gate Valve
- Humeceptor Pit
- Safety Data Sheets
- Bunds
- Spill kits
- Personal Protective Equipment (PPE)
 - Safety footwear
 - Eye protection
 - High visibility clothing
 - Hearing protection (in certain areas)
- First aid kits
- Fire suppression equipment
- Evacuation procedures

10.0 Pollution Incident Response

St Mary's Contact Details

Title	Contact Details
Operations Manager	0437 457 527
Plant Supervisor	0415 429 377
National HSEQ Manager	0422 205 013

10.1. PIRMP activation

The Operations Manager is responsible for activating the PIRMP, if unavailable, the Plant Supervisor is to activate and follow the Chief Warden responsibilities outlined in PR600 Emergency Response Procedure.

10.2. Notifying relevant authorities

Firstly, the Operations Manager (or Plant Supervisor if unavailable) is to call **000** if the incident presents an immediate threat to human health or property.

The information reported to external authorities must contain the following information:

NOTIFICATION INFORMATION
<ol style="list-style-type: none">1. Time, date, nature, duration and location of pollution incident.2. Location where pollution is occurring or is likely to occur.3. Nature, estimated quantity and concentration of pollutant if known.4. How this happened and what is thought to have caused it.5. Action taken or proposed to be taken to manage the pollution incident.

If the incident does not require an initial combat agency, or once the 000 call has been made, the St Mary's Operations Manager (or Plant Supervisor if unavailable) is to adhere to PR600 Emergency Response Procedures.

The CEO and/or National HSEQ Manager will notify relevant external parties as per their duties outlined in PR600 Emergency Response Procedure.

Relevant Authority	Contact Details
Fire & Rescue NSW	1300 729 579 / 000
EPA	13 15 55
Penrith Public Health Unit	(02) 4734 2022
SafeWork NSW	13 10 50
Penrith Council	(02) 4732 7777

10.3. Communicating with Neighbours and Local Community

In the event of a pollution incident the CEO and/or National HSEQ Manager will maintain constant communication with relevant neighbours and the local community. The extent and content of community notification will be determined by Management, based on the nature and extent of the pollution incident. This may be achieved using phone, email or face-to-face communication.

Business Name	Relation	Contact Details
Brunnings	Immediate Neighbour	0423 770 735
Lisbon Engineering Pty Ltd	Immediate Neighbour	(02) 9673 4555
Kennards Self Storage	Within Community	(02) 9833 0015
Sims Metal	Within Community	(02) 9623 0391

10.4. Managing response of incident

The Operations Manager (or Plant Supervisor if unavailable) is to coordinate the emergency response as per the Chief Warden duties outlined in PR600 Emergency Response Procedure.

Immediate actions to be taken in the event of an emergency must follow the steps contained within the PR600 Emergency Response Procedure. This includes the use of spill kits; first aid kits; the evacuation of people; and the use of fire suppression equipment among other control methods, where applicable.

The Tyrecycle Incident Reporting, Warden, First Aid and Training processes also apply in the event of an emergency.

11.0 Actions to be taken to minimise harm

During a pollution incident

In the event of a pollution incident, employees are to undertake actions as per PR600 Emergency Response Procedure, ensuring that minimising harm is the priority. This procedure has been designed for implementation at Tyrecycle's St Mary's site to control foreseen emergency situations that can affect occupant safety, plant assets, the environment or the continuity of business operations.

General controls for managing a pollution incident include;

- Visually assess the situation. Undertake emergency response if required
- If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident
- Take direction from Emergency Services and appropriate Regulatory Authorities
- If required seek assistance from specialist consultants/contractors

Following a pollution incident

If a pollution incident occurs, a detailed investigation will be undertaken as per the Incident Management Procedure.

Within one month of a pollution incident occurring, this PIRMP, along with other relevant plans and procedures, will be formally reviewed and tested to ensure this PIRMP is accurate, current and capable of being performed in a practical and effective manner.

12.0 PIRMP Testing

This PIRMP is tested once a year to ensure that the information in the document is accurate, that legislative references are current and that records are being maintained. This plan will also be tested within one month of any pollution incident occurring. This testing may include;

- Performing a desktop review and undertaking desktop simulations of incident or potential incidents, and/or
- Simulated training, exercises or drills to ensure the plan is capable of being implemented in a workable and effective manner

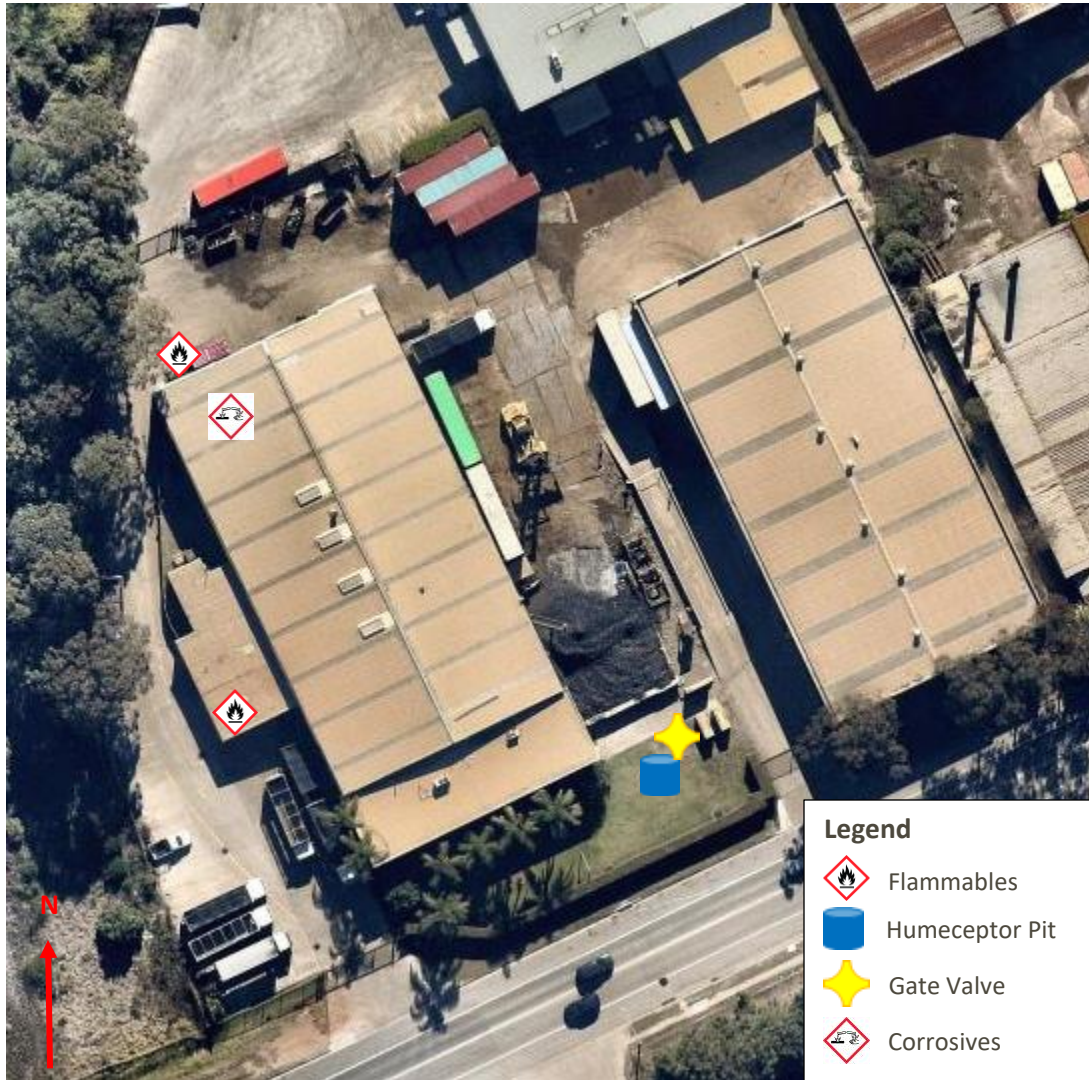
Date of Test	Testers	Comments
3/08/2016	Sarah Toomey & Tony Jankovic	V2.0 created and implemented
12/07/2017	Sarah Toomey & Reg D'Souza	PIRMP tested, information still current, no events requiring activation since last test
31/05/2018	Sarah Toomey & Madusha Sumanadasa	Update both appendices, no events occurred that required the activation of this plan since the last test
4/07/2019	Sarah Toomey & Ashley Battilana	Reviewed PIMRP in line with new guidelines, V3.0 created and implemented 15.08.19

Date of Test	Testers	Comments
08/04/2020	Timothy Huempel & Michael Tolentino	Reviewed PIRMP in line with PEOA and guidelines, V4.0 created and implemented 14.08.19

13.0 Appendix One – Regional Map



14.0 Appendix Two – Chemical Storage



15.0 Appendix Three – Emergency Evacuation Diagram

