Pollution Incident Response Management Plan

1/21 Grady Cres, Erskine Park NSW

Tyrecycle

Contents

1.0 Purpose

Tyrecycle has developed this Pollution Incident Response Management Plan (PIRMP) to ensure compliance with our obligations under the Protection of the Environment Operations Act (POEO) 1997. More importantly, provide clear direction to the employees and contractors on managing and responding to any pollution incidents that may occur.

Suppose a pollution incident occurs and material harm to the environment is caused or threatened. In that case, the person carrying on the activity must immediately implement this plan concerning the action required by Part 5.7A of the POEO Act 1997.

Copy of this plan is kept at 1/21 Grady Cres, Erskine Park NSW and online at www.tyrecycle.com.au.

2.0 Scope

This document applies to all activities, products and services conducted at 1/21 Grady Cres, Erskine Park 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 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	"…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."
Material Harm to the Environment	Actual or potential harm to ecosystems or to the health or safety of people that are 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 that poses a threat to the surrounding environment.

4.0 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 21464

5.0 Internal References

- PR600 Emergency Response Procedure
- PR602 Incident Management Procedure

6.0 Environmental Protection Licence (EPL) Details

Name of licensee:	Tyrecycle Pty Ltd
Premises name and address:	1/21 Grady Cres, Erskine Park NSW
Website address:	https://www.tyrecycle.com.au/
Scheduled activities on EPL:	This license allows for the storage of 970 tonnes of waste tyres (T140) at any one time and an annual throughput of 29,000 tonnes. A maximum of 60 tonnes of waste lead-acid batteries and/or waste oil is permitted to be stored at the premises at any time.

7.0 Potential Environmental Hazards

7.1 Identification of Potential Hazards

The environmental aspects identified for this site include general waste management, water, air quality, noise, dangerous good, stormwater. The environmental aspects and impacts identified for this site are listed further in the Aspect and Impact Register. Risk levels are based on the following matrix.

	Consequence					
	Negligible Injury - First aid treatment	*Minor Injury - Injury requiring medical treatment*	*Moderate Injury - Injury requiring extensive medical treatment*	*Major Injury - Injury resulting in permanent incapacitation*	*Catastrophic Injury - Injuries resulting in single or multiple deaths*	WHS
	Negligible or no quality damage/impact	*Minor quality damage/impact*	*Significant quality damage/impact*	*Major quality damage/impact*	*Extensive quality damage & loss*	Quality
	Negligible or no environmental damage/impact	*Minor environmental damage/impact*	*Significant environment damage/impact*	*Major environmental damage/impact*	*Extensive environmental damage & biodiversity degradation*	Environment
Likelihood	*Negligible financial loss <= $5k*	*Notable financial loss $5k - $50k*	*Substantial financial loss $50k - $500k*	*Significant financial loss $1m+*	*Extensive financial loss $5m+*	Business
Almost Certain	11 Medium	16 High	20 High	23 Extreme	25 Extreme	
Likely	7 Medium	12 Medium	17 High	21 High	24 Extreme	
Possible	4 Low	8 Medium	13 Medium	18 High	22 High	
Unlikely	2 Low	5 Low	9 Medium	14 Medium	19 High	
Very Unlikely	1 Low	3 Low	6 Low	10 Medium	15 High	

The site at 1/21 Grady Cres, Erskine Park NSW, is used to recycle end of life tyres, primarily by shredding and crumbing. The Tyrecycle fleet of heavy rigid cage trucks collect waste tyres from customers and unload them at the Tyrecycle site. In addition to waste tyres, small quantities of used batteries, scrap steel and waste oil filters are collected from customers; and are held on-site temporarily until another contractor collects them.

Table 1 below identifies the main hazards to human health and/or the environment associated with Tyrecycle operations.

Table 1 Identification of Hazard risk assessment

Identified Hazard	Consequence	Likelihood	Level of Risk
Air Pollution Incident			
Dust	Minor	Very Unlikely	Low
Smoke / Fire	Major	Unlikely	Medium
Water Pollution Incident			
Oil Spill	Significant	Unlikely	Medium
Chemical Spill	Significant	Unlikely	Medium
Battery Acid Spill	Significant	Unlikely	Medium
Tyre Shred Contamination	Significant	Possible	Medium
Fire Wash Water	Major	Possible	High
Noise Pollution Incident			
Tyre shredding processes and mobile plant operation	Minor	Possible	Medium
Land Pollution Incident			
Fire	Significant	Possible	Medium
Oil / Chemical Spill	Significant	Unlikely	Medium

7.2 Pre-Emptive Actions

Table 2 describes the control measures taken to minimise or prevent harm to human health and/or the environment associated with Tyrecycle operations.

Table 2 Control measures in place

Identified Hazard	Control Measures
Noise	Air noise routines inspection (Yearly assessment plan).
Oil Filter Spill	**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 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	**1.** Batteries are stored on bunds; undercover, between each layer of batteries, there must be a non-conductive layer; plastic or cardboard sheets need to be inserted before you move to the next row. **2.** Limits placed on stacking to max two batteries high; spill kit is 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.** Limits placed on stacking to max two batteries high. Spill kit and eyewash facility available if a spill or leak does occur.

Tyre Shred Contamination	**1.** Shred is stored inside, in a dedicated, cordoned-off area, protected from weather and cross contamination with other processes on-site. **2.** Shred is loaded from storage area directly into shipping containers. Any product that leaves the area is routinely picked up/raked up.
Dust	**1.** All areas of the site are concrete. **2.** All areas of the site are swept on a minimum weekly basis. **3.** A speed limit of 10 kph is imposed to minimise the dust raised by truck.
Fire (Air, Water & Land contamination)	**1.** Fire Prevention: Fixed plant fitted with spark detection system linked to water sprays, 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: Plant and equipment fitted with water sprays, Adequate & effective hydrants; hose reels, building sprinklers, extinguishers, emergency service access. **5.** Mobile plant onsite to separate tyres on fire from the rest of the pile.
Chemical Spill	**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. **4.** Routine inspections, observations and audits conducted as per IPI table to monitor and verify. **5.** Flammable products stored in flameproof, bunded 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 Erskine Park facility. Specific chemicals can be found in the Erskine Park 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 Inventory Pollutants

Potential Pollutant	Maximum Quantity
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 60 Tonnes at any time
Waste Oil from Filter Storage	Max 60 Tonnes at any time

9.0 Safety Equipment

In order to minimise 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);

- 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

Erskine Park Contact Details

Title	Contact Details
Operations Manager	0457 488 243
Plant Supervisor	0437 457 527
National Collections Manager	0477 808 743

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

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 Erskine Park'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
Coates Hire Erskine Park	Business Neighbour	02 88250100
IVE – Integrated Logistics NSW	Business Neighbour	02 80645500

DHL Supply Chain	Business Neighbour	02 8759 7000
PMA Global Pty	Business Neighbour	02 96290800

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

<u>During a pollution incident</u>

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 Erskine Park'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

<u>Following a pollution incident</u>

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 PIMP 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
16/11/2021	Carolina Charry & Lathen Loibl	V1.0 created and implemented

13.0 Appendix One – Regional Map

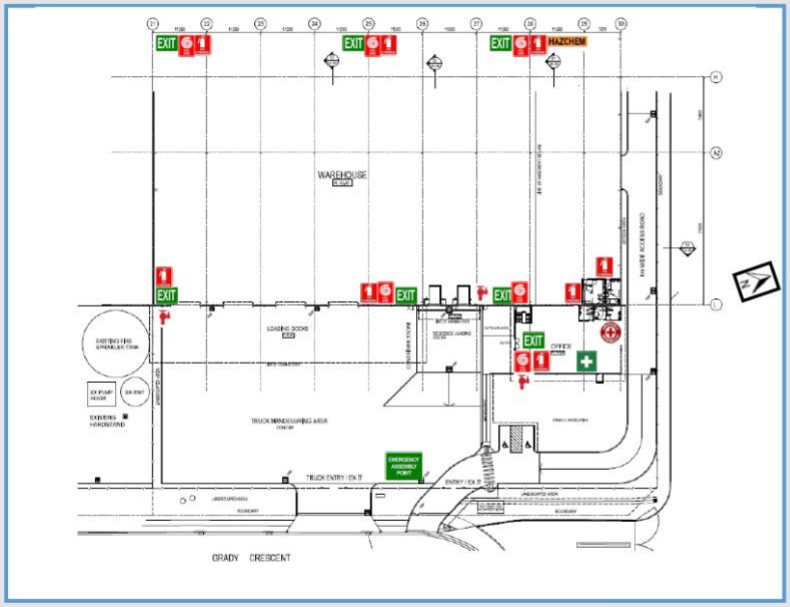
14.0 Appendix Two – Chemical Storage

15.0 Appendix three – Emergency Evacuation Diagram

EMERGENCY EVACUATION DIAGRAM

NSW — 1-21 Grady Crescent, Erskine Park, NSW 2759

Tyrecycle



EMERGENCY RESPONSE

ASSIST ANYONE IN DANGER, IF SAFE

ALERT OTHERS

CALL 000

FOLLOW WARDEN INSTRUCTIONS

FIGHT FIRE, IF SAFE

EVACUATE TO THE ASSEMBLY POINT

KEEP ACCESS CLEAR FOR EMERGENCY VEHICLES

Street name & number:	1-21 Grady Crescent, Erskine Park, NSW 2759
Nearest intersection:	LEONORE DRIVE

LEGEND

V1.0 April 2021