

# PLAN 504 - Pollution Incident Response Management Plan

1/21 Grady Cres, Erskine Park, NSW

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# 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* and the *Protection of the Environment Operations (General) Regulation 2009*.

The PIRMP provides direction to team members and contractors on managing and responding to any pollution incidents that may occur at Tyrecycle's Erskine Park facility.

A copy of this plan is kept at **1/21 Grady Cres, Erskine Park, NSW** and online at [www.tyrecycle.com.au](http://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 Procedure
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	
Environmental Hazard	Any situation or state of events that poses a threat to the surrounding environment.
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.
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.
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.”

## 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 11686

## 5.0 Internal References

RG506 - Tyrecycle Newcastle Aspects and Impacts Register

## 6.0 Environmental Protection Licence (EPL)

<b>Details Name of licensee:</b>	Tyrecycle Pty Ltd
<b>Premises name and address:</b>	1/21 Grady Cres, Erskine Park, NSW
<b>Website address:</b>	<a href="https://www.tyrecycle.com.au/">https://www.tyrecycle.com.au/</a>
<b>EPL Number:</b>	21464

### Scheduled activities on EPL:

This license allows for the storage of 970 tonnes of waste tyres 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 goods and stormwater. The environmental aspects and impacts identified for this site are listed further in the site's Aspect and Impact Register (RG505). Risk levels are based on the following table.

Table 1: Environmental Risk Matrix

Likelihood	Consequence					
	<i>Negligible Injury - First aid treatment</i>	<i>Minor Injury - Injury requiring medical treatment</i>	<i>Moderate Injury - Injury requiring extensive medical treatment</i>	<i>Major Injury - Injury resulting in permanent incapacitation</i>	<i>Catastrophic Injury - Injuries resulting in single or multiple deaths</i>	WHS
	<i>Negligible or no quality damage/impact</i>	<i>Minor quality damage/impact</i>	<i>Significant quality damage/impact</i>	<i>Major quality damage/impact</i>	<i>Extensive quality damage &amp; loss</i>	Quality
	<i>Negligible or no environmental damage/impact</i>	<i>Minor environmental damage/impact</i>	<i>Significant environment damage/impact</i>	<i>Major environmental damage/impact</i>	<i>Extensive environmental damage &amp; biodiversity degradation</i>	Environment
	<i>Negligible financial loss &lt;= \$5k</i>	<i>Notable financial loss \$5k - \$50k</i>	<i>Substantial financial loss \$50k - \$500k</i>	<i>Significant financial loss \$1m+</i>	<i>Extensive financial loss \$5m+</i>	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. 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 for recycling.

Table 2. below identifies the main hazards to human health and/or the environment associated with Tyrecycle operations.

**Table 2. Identification of Hazard risk assessment**

Identified Hazard	Consequence	Likelihood	Level of Risk
<b>Air Pollution Incident</b>			
Incident #1 - Dust	Minor	Very Unlikely	Low
Incident #2 - Smoke	Major	Unlikely	Medium
<b>Liquid Pollution Incident</b>			
Incident #3 - Oil Spill	Major	Unlikely	Medium
Incident #4 - Chemical Spill	Major	Unlikely	Medium
Incident #5 - Battery Acid Spill	Major	Unlikely	Medium
Incident #6 - Tyre Shred Contamination	Major	Possible	High
Incident #7 - Fire Wash Water	Major	Unlikely	Medium
<b>Noise Pollution Incident</b>			
Incident #8 - Tyre shredding processes and mobile plant operation	Minor	Possible	Medium
<b>Land Pollution Incident</b>			
Incident #10 - Fire	Major	Possible	High

## 7.2 Pre-emptive Actions

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 HSEQ management system and can be found at [www.skytrust.com.au](http://www.skytrust.com.au).

Table 3. describes the control measures taken to minimise or prevent harm to human health and/or the environment associated with Tyrecycle operations.

**Table 3. Control measures in place**

Identified Hazard	Control Measures
<b>Noise</b>	1. General observations from staff to minimize noise
<b>Oil Filter Spill</b>	<ol style="list-style-type: none"> <li>1. Oil filters are pre-drained by the customer prior to collection to reduce residual volume.</li> <li>2. Oil filters are stored in containers that are on undercover bunds.</li> <li>3. Spill kits are available, and employees are trained to use them.</li> <li>4. Regular collections are arranged to ensure that minimum levels are maintained on site.</li> <li>5. Induction training modules (employees and contractors) including Collection SWMS, Collection Truck Training Module and Truck audits.</li> </ol>

<b>Battery Acid Spill</b>	<ol style="list-style-type: none"> <li>1. Batteries are stored in bunds and are undercover. Between each layer of batteries there must be a non-conductive layer, plastic or cardboard sheets.</li> <li>2. Limits placed on stacking; maximum two batteries high. Spill kit and eyewash facilities are available if a spill or leak does occur.</li> <li>3. Regular weekly collections to always minimise stock.</li> <li>4. Training to ensure staff adhere to procedure.</li> </ol>
<b>Tyre Shred Contamination</b>	<ol style="list-style-type: none"> <li>1. Shred is stored inside, in a dedicated, cordoned-off area, protected from weather and cross-contamination with other processes on-site.</li> <li>2. Shred is loaded from storage area directly into shipping containers. Any product that leaves the area is routinely cleaned up.</li> </ol>
<b>Dust</b>	<ol style="list-style-type: none"> <li>1. All areas of the site are concrete.</li> <li>2. All areas of the site are swept on a minimum weekly basis.</li> <li>3. A speed limit of 10 kph is imposed to minimise the dust raised by vehicles. .</li> </ol>
<b>Fire (Air, Water &amp; Land contamination)</b>	<ol style="list-style-type: none"> <li>1. Fire Prevention: Pre-employment arson checks, site security, CCTV, and voice alarms alert staff on site when the thermal cameras detect higher than normal levels of heat. Ignition sources are assessed and managed. Hot work permit system, site induction, emergency preparedness drills, worker training, housekeeping / waste storage / , chemical storage observations, internal and external audits.</li> <li>2. Fuel loads: Pile dimensions and stock management plan.</li> <li>3. Fire spread: Pile and boundary separation, mobile plant.</li> <li>4. Fire suppression: Adequate and effective hydrants, hose reels, sprinklers, extinguishers, emergency services access.</li> <li>5. Mobile plant onsite to separate burning tyres from the rest of the pile if required.</li> <li>6. Cleaning schedule is implemented to ensure there is no buildup of dust and debris in upper levels of factory.</li> </ol>
<b>Water deluge from fire sprinkler system</b>	<ol style="list-style-type: none"> <li>1. Mechanism for repelling water away from all doors to minimise impact to office area on the same level, and to prevent water escaping building i.e. door seal, bunding, metal plates that can be fitted over drains and drain wardens to catch unwanted material entering drainage system.</li> </ol>
<b>Chemical Spill</b>	<ol style="list-style-type: none"> <li>1. Oils, greases and coolants are stored on bunds in the maintenance shed.</li> <li>2. Correct disposal of waste as required.</li> <li>3. Spill kits stocked and located nearby in the event of a spill or leak.</li> <li>4. Routine inspections, observations and audits conducted as per IPI schedule.</li> <li>5. Flammable products stored in flameproof, bunded cabinet.</li> </ol>
<b>Truck Wash Wastewater</b>	<p>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.</p>



## 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 Safety Data Sheets is at each relevant chemical 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

To minimise risks to human health or the environment and to contain or control a pollution incident, Tyrecycle Cameron Park has the following on site:

- 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 Contact Details

Title	Name	Responsibility	Contact Details
Site Operations Manager		<ul style="list-style-type: none"><li>• PIRMP activation</li><li>• Notifying relevant authorities</li></ul>	
GM Operations			
CEO		<ul style="list-style-type: none"><li>• Community &amp; neighbour notifications</li></ul>	
National Environment Manager			

## 10.1. Notifying relevant authorities

Firstly, the Operations Manager 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 Operations Manager is to notify the Environment Manager of the incident. The Environment Manager will notify relevant external parties as per their duties.

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

Communicating with Neighbours and Local Community

In the event of a pollution incident the Operations Manager and Environment 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.

## Managing response of incident

The Operations Manager (or chief fire warden if different) is to coordinate the emergency response. This includes the use of spill kits, first aid kits, 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 PIRMP Response Actions

Incident #1	<b>Air Pollution incident from dust</b> <ul style="list-style-type: none"><li>• <b>Immediate Action:</b><ul style="list-style-type: none"><li>• Identify the source of the excessive dust generation.</li><li>• If possible and safe, immediately reduce or stop the dust generation (e.g., turn off equipment).</li><li>• Warn personnel in the vicinity of the dust hazard and advise on respiratory protection if necessary.</li></ul></li><li>• <b>Assessment and Containment:</b><ul style="list-style-type: none"><li>• Assess the extent and severity of the dust plume and its potential impact on the surrounding environment.</li><li>• Implement temporary dust suppression measures (e.g., watering down surfaces, using portable dust collectors).</li></ul></li></ul>
Alarm raising	Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.
Emergency Controller	Operations Manager
Communication/Reporting	Internal: <ul style="list-style-type: none"><li>• GM Operations</li><li>• Environment Manager</li><li>• HSQ Manager</li></ul> External: <ul style="list-style-type: none"><li>• If dust incident is likely to cause significant air pollution beyond the site's boundary, then the Environment Manager is to notify the NSW EPA/local council</li></ul> Incident must be reported into SkyTrust
Rescue + First Aid	As per Site Emergency Plan if required
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"><li>• Clean up settled dust using appropriate methods (e.g., vacuuming with HEPA filters, wet sweeping – avoid dry sweeping).</li><li>• Investigate the cause of the dust incident.</li><li>• Implement permanent measures to prevent recurrence (e.g., dust extraction systems, enclosure of processes, changes to materials handling).</li><li>• Monitor air quality if necessary.</li></ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan

	RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

Incident #2	<b>Air Pollution incident from smoke</b> <ul style="list-style-type: none"> <li>• <b>Immediate Action:</b> <ul style="list-style-type: none"> <li>• Identify the source of the excessive smoke generation.</li> <li>• If possible and safe, immediately reduce or stop the smoke generation (e.g., turn off equipment).</li> <li>• If smoke from potential fire, evacuate the area and notify Operations Manager.</li> <li>• Warn personnel in the vicinity of the smoke hazard and advise on respiratory protection if necessary.</li> </ul> </li> <li>• <b>Assessment and Containment:</b> <ul style="list-style-type: none"> <li>• Assess the extent and severity of the smoke incident and its potential impact on the surrounding environment.</li> <li>• Implement temporary fire suppression measures (e.g., fire extinguishers, sprinklers).</li> </ul> </li> </ul>
Alarm raising	In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).
Emergency Controller	Operations Manager
Communication/Reporting	Internal: <ul style="list-style-type: none"> <li>• GM Operations</li> <li>• Environment Manager</li> <li>• HSQ Manager</li> </ul> External: <ul style="list-style-type: none"> <li>• NSW EPA/local council if smoke is from a fire</li> </ul> Incident must be reported into SkyTrust
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>• Clean up settled debris using appropriate methods</li> <li>• Investigate the cause of the smoke incident.</li> <li>• Implement measures to prevent recurrence</li> </ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

Incident #3	<b>Oil spill</b> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>• Stop the source of the spill if safe to do so.</li> <li>• Warn personnel in the area of the spill hazard.</li> <li>• Prevent the spill from entering drains or waterways by using spill containment equipment (e.g., bunding, spill mats, booms).</li> </ul>
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	<b>Assessment and Containment:</b> <ul style="list-style-type: none"> <li>Assess the volume and extent of the spill.</li> <li>Contain the spill using absorbent materials (e.g., granules, pads).</li> <li>If the spill has entered drains or waterways, immediately block the entry point if safe and feasible.</li> </ul>
Alarm raising	<p>In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</p> <p>Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.</p>
Emergency Controller	Operations Manager
Communication/Reporting	<p>Internal:</p> <ul style="list-style-type: none"> <li>HSQ Manager</li> <li>Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities (e.g., local council, water authority).</li> </ul> <p>Incident must be reported into SkyTrust</p>
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>Clean up the spilled oil and contaminated materials using appropriate personal protective equipment (PPE).</li> <li>Store contaminated materials in sealed, labelled containers for proper disposal by a licensed waste contractor.</li> <li>Clean the affected area thoroughly.</li> <li>Investigate the cause of the spill.</li> <li>Review storage and handling procedures for the oil.</li> <li>Implement measures to prevent recurrence (e.g., improved storage, bunding, training, spill response equipment).</li> </ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

Incident #4	<b>Chemical spill</b> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>Prioritize the safety of personnel. Evacuate the spill area if necessary.</li> <li>Stop the source of the spill if safe to do so.</li> <li>Warn personnel in the area of the spill hazard.</li> <li>Consult the Safety Data Sheet (SDS) for the spilled chemical for specific hazards and handling procedures.</li> <li>Ensure adequate ventilation if the chemical is volatile or releases hazardous fumes.</li> </ul> <p><b>Assessment and Containment:</b></p> <ul style="list-style-type: none"> <li>Assess the type, volume, and extent of the spill.</li> <li>Identify potential pathways for the chemical to enter the environment (drains, waterways, soil).</li> </ul>
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	<ul style="list-style-type: none"> <li>Contain the spill using appropriate spill containment equipment (e.g., bunding, spill mats, booms, drain covers).</li> <li>Neutralize or absorb the chemical using appropriate materials as specified in the SDS.</li> </ul>
Alarm raising	<p>In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</p> <p>Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.</p>
Emergency Controller	Operations Manager
Communication/Reporting	<p>Internal:</p> <ul style="list-style-type: none"> <li>HSQ Manager</li> <li>Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities (e.g., local council, water authority).</li> </ul> <p>Incident must be reported into SkyTrust</p>
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>Clean up the spilled chemical and contaminated materials using appropriate PPE as specified in the SDS.</li> <li>Store contaminated materials in sealed, labelled containers compatible with the spilled chemical for proper disposal by a licensed waste contractor.</li> <li>Decontaminate the affected area according to the SDS and relevant guidelines.</li> <li>Investigate the cause of the spill.</li> <li>Review storage and handling procedures for the chemical.</li> <li>Implement measures to prevent recurrence (e.g., improved storage, bunding, training, spill response equipment).</li> </ul>
Relevant documents	<p>EMP-EP-01 – Erskine Park Environment Management Plan</p> <p>RG505 - Erskine Park Aspects and Impacts Register</p> <p>EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence</p>

Incident #5	<p><b>Battery Acid spill</b></p> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>Stop the source of the spill if safe to do so.</li> <li>Warn personnel in the area of the spill hazard.</li> <li>Ensure adequate ventilation in the area.</li> <li>Prevent the spill from entering drains or waterways by using spill containment equipment (e.g., bunding, spill mats).</li> </ul> <p><b>Assessment and Containment:</b></p> <ul style="list-style-type: none"> <li>Assess the volume and extent of the spill.</li> <li>Contain the spill using appropriate neutralizing agents (e.g., sodium bicarbonate, soda ash) according to the Safety Data Sheet (SDS). Always add neutralizer to acid, never the other way around.</li> <li>Use absorbent materials to soak up the neutralized spill.</li> </ul>
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Alarm raising	<p>In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</p> <p>Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.</p>
Emergency Controller	Operations Manager
Communication/Reporting	<p>Internal:</p> <ul style="list-style-type: none"> <li>• HSQ Manager</li> <li>• Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>• If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities.</li> </ul> <p>Incident must be reported into SkyTrust</p>
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>• Clean up the neutralized spill and contaminated materials using appropriate PPE (acid-resistant gloves, eye protection, etc.).</li> <li>• Store contaminated materials in sealed, labelled containers for proper disposal by a licensed waste contractor.</li> <li>• Clean the affected area thoroughly with water.</li> <li>• Investigate the cause of the spill.</li> <li>• Review storage and handling procedures for the batteries</li> <li>• Implement measures to prevent recurrence (e.g., improved storage, bunding, training, spill response equipment).</li> </ul>
Relevant documents	<p>EMP-EP-01 – Erskine Park Environment Management Plan</p> <p>RG505 - Erskine Park Aspects and Impacts Register</p> <p>EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence</p>

Incident #6	<p><b>Tyre shred contamination</b></p> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>• Identify the source of the contaminated water runoff.</li> <li>• If possible and safe, stop or divert the flow of water over the tyre shreds.</li> <li>• Prevent the contaminated water from entering drains or waterways by using spill containment equipment (e.g., bunding, sandbags).</li> <li>• Warn personnel in the area of the potential hazard.</li> </ul> <p><b>Assessment and Containment:</b></p> <ul style="list-style-type: none"> <li>• Assess the volume and extent of the contaminated water.</li> <li>• If the contaminated water has entered drains or waterways, immediately block the entry point if safe and feasible.</li> <li>• Contain any pooled contaminated water using temporary barriers or collection methods (e.g., pumps and temporary storage).</li> </ul>
Alarm raising	<p>In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</p> <p>Any personnel involved or witnessing the incident is to report to the</p>



	Operations Manager and PIRMP actions are to be implemented.
Emergency Controller	Operations Manager
Communication/Reporting	<p>Internal:</p> <ul style="list-style-type: none"> <li>• HSQ Manager</li> <li>• Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>• If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities.</li> </ul> <p>Incident must be reported into SkyTrust</p>
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>• Clean up the neutralized spill and contaminated materials using appropriate PPE (acid-resistant gloves, eye protection, etc.).</li> <li>• Store contaminated materials in sealed, labelled containers for proper disposal by a licensed waste contractor.</li> <li>• Clean the affected area thoroughly with water.</li> <li>• Investigate the cause of the spill.</li> <li>• Review storage and handling procedures for the tyres</li> <li>• Implement measures to prevent recurrence (e.g., improved storage, bunding, training, spill response equipment).</li> </ul>
Relevant documents	<p>EMP-EP-01 – Erskine Park Environment Management Plan</p> <p>RG505 - Erskine Park Aspects and Impacts Register</p> <p>EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence</p>

Incident #7	<p><b>Fire wash water contamination</b></p> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>• Prioritize the safety of personnel. Follow fire emergency procedures.</li> <li>• During fire suppression activities, make every effort to contain the firewash water on-site and prevent its release to the environment. This may involve using temporary barriers, directing flow to contained areas, or using absorbent materials in drains.</li> </ul> <p><b>Assessment and Containment:</b></p> <ul style="list-style-type: none"> <li>• Assess the volume of firewash water generated and its potential contamination.</li> <li>• Ensure all firewash water is contained on-site and prevented from entering drains, waterways, or soil.</li> <li>• If containment measures were not fully effective during the fire, immediately implement secondary containment measures to prevent further spread.</li> </ul>
Alarm raising	<p>In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</p> <p>Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.</p>
Emergency Controller	Operations Manager
Communication/Reporting	Internal:

	<ul style="list-style-type: none"> <li>• HSQ Manager</li> <li>• Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>• If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities.</li> </ul> <p>Incident must be reported into SkyTrust</p>
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>• Collect all contained firewash water using pumps or other appropriate methods.</li> <li>• Store the firewash water in sealed, labelled containers for proper testing and disposal by a licensed waste contractor.</li> <li>• Sample and analyse any potentially contaminated soil or surfaces and implement appropriate remediation measures.</li> <li>• Investigate the cause of the incident.</li> <li>• Implement measures to prevent recurrence (e.g., improved storage, bunding, training, spill response equipment).</li> </ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

Incident #8	<p><b>Noise pollution incident from tyre shredding and mobile plant</b></p> <p><b>Immediate Action:</b></p> <ul style="list-style-type: none"> <li>• Identify the specific source(s) of the excessive noise from tyre shredding equipment or mobile plant.</li> <li>• If possible and safe, immediately reduce the noise generation at the source (e.g., turn off equipment, reduce operating speed, implement temporary noise barriers).</li> <li>• Warn personnel in the immediate vicinity of the noise hazard and ensure they are wearing appropriate hearing protection.</li> </ul> <p><b>Assessment and Containment:</b></p> <ul style="list-style-type: none"> <li>• Assess the extent, duration, and potential impact of the noise pollution beyond the workplace boundary. Consider factors like time of day and proximity to sensitive receptors (residential areas, schools, etc.).</li> <li>• Implement temporary noise mitigation measures if feasible (e.g., relocate activities, if possible, use temporary acoustic screens or barriers).</li> </ul>
Alarm raising	Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.
Emergency Controller	Operations Manager
Communication/Reporting	<p>Internal:</p> <ul style="list-style-type: none"> <li>• HSQ Manager</li> <li>• Environment Manager</li> </ul> <p>External:</p> <ul style="list-style-type: none"> <li>• If the noise levels exceed regulatory limits or are likely to cause</li> </ul>

	significant disturbance to the surrounding community, immediately notify the NSW EPA and your local council.
	Incident must be reported into SkyTrust
Rescue + First Aid	NA
Post Incident Clean Up and Corrective Actions	<ul style="list-style-type: none"> <li>Investigate the root cause of the excessive noise (e.g., equipment malfunction, inefficient operating procedures, lack of noise control measures).</li> <li>Implement permanent noise reduction measures if required</li> </ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

Incident #10	<b>Fire</b>  <b>Immediate Action:</b> <ul style="list-style-type: none"> <li>Prioritise the safety of personnel. Evacuate the area immediately following your workplace's fire emergency plan.</li> <li>Activate the fire alarm.</li> <li>If safe to do so and trained, attempt to extinguish the fire using appropriate fire extinguishers.</li> </ul> <b>Notification:</b> <ul style="list-style-type: none"> <li>Immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).</li> <li>Immediately notify the NSW EPA if the fire has the potential to cause significant air, water, or land pollution (e.g., large fire involving hazardous materials, significant smoke plume, contaminated firewater runoff).</li> </ul>
Alarm raising	In case of a fire, immediately call the NSW Fire and Rescue NSW (Triple Zero - 000).  Any personnel involved or witnessing the incident is to report to the Operations Manager and PIRMP actions are to be implemented.
Emergency Controller	Operations Manager
Communication/Reporting	Internal: <ul style="list-style-type: none"> <li>HSQ Manager</li> <li>Environment Manager</li> <li>GM Operations</li> <li>CEO</li> </ul> External: <ul style="list-style-type: none"> <li>If the spill is significant or has entered or is likely to enter drains or waterways, immediately notify the NSW EPA and other relevant authorities.</li> </ul> Incident must be reported into SkyTrust
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Post Incident Clean Up and	<ul style="list-style-type: none"> <li>Allow emergency services to manage the fire and its aftermath.</li> </ul>

Corrective Actions	<ul style="list-style-type: none"> <li>Once the area is safe, assess any environmental damage caused by the fire (e.g., smoke and soot contamination, contaminated runoff).</li> <li>Collect and contain all fire wash water for proper testing and disposal by a licensed waste contractor. Do not allow it to discharge to the environment without assessment and approval.</li> <li>Implement clean-up procedures for soot and other residues as directed by authorities and your environmental consultant.</li> <li>Investigate the cause of the fire and implement preventative measures.</li> </ul>
Relevant documents	EMP-EP-01 – Erskine Park Environment Management Plan RG505 - Erskine Park Aspects and Impacts Register EPL#21464 – Tyrecycle Cameron Park Environment Protection Licence

## 12.0 PIRMP Testing

In accordance with Part 5.7A of the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009, this PIRMP is tested once a year to ensure that the information in the document is accurate, legislative references are current and 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.

### PIRMP Test Log

Date	Type	Tester
14/04/2025	Desktop	HSE

## Appendix 1 – Regional Map



TYRECYCLE (Erskine Park)

PLAN 504 | VERSION 3 | DATE 25.8.2025

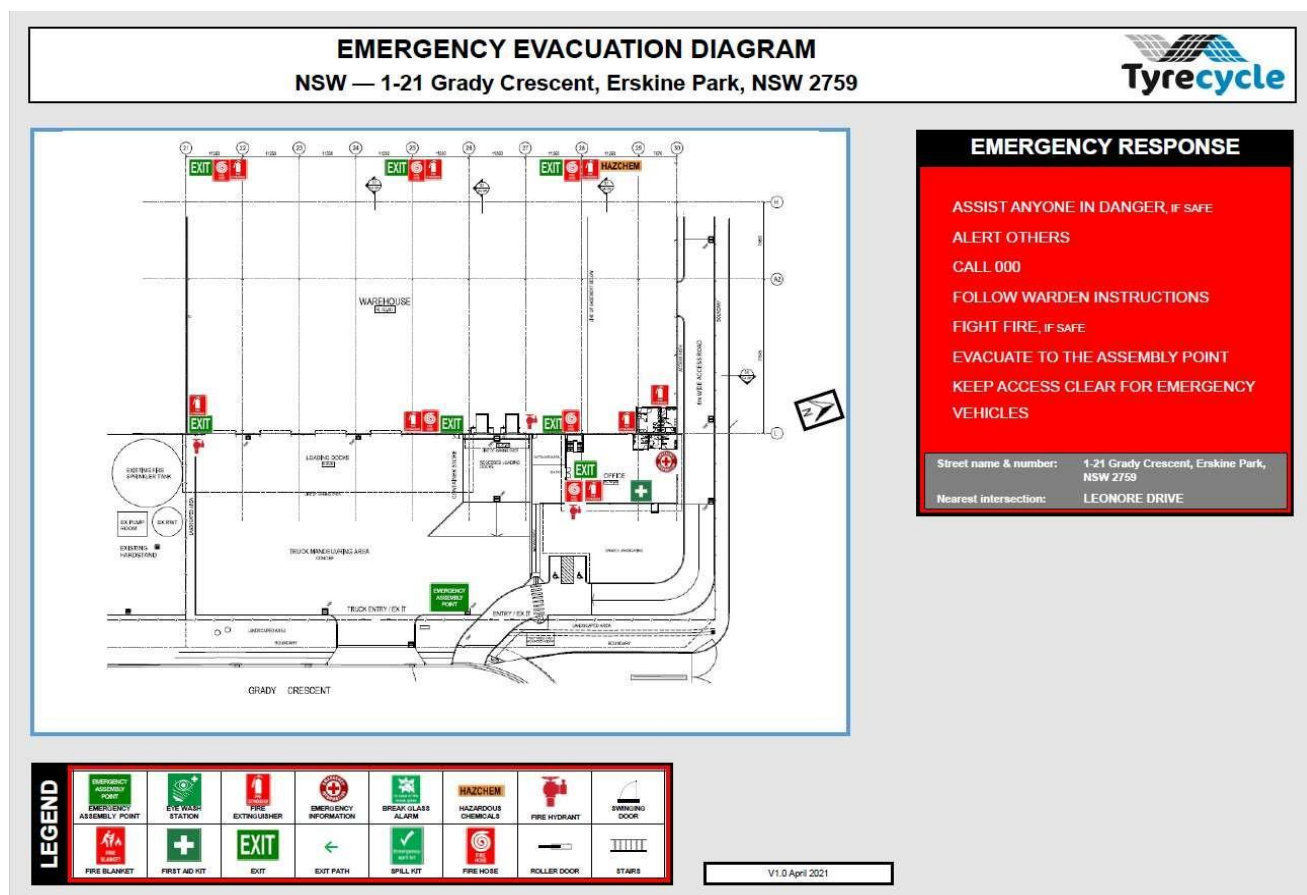
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## Appendix 2 – Chemical Storage



# Appendix 3 – Emergency Evacuation Diagram



Office Use Only

PLAN 504 - Pollution Incident Response Management Plan

Form Owner	HSE
Form Approver	HSE
Approved Date	14/4/2025
Last Review Date	25/08/2025
Next Review Date	25/08/2028

Version	Date	Amendment	Author
1	07/07/2024	Initial	HSE
2	14/04/2025	Update/Changes to personnel	HSE
3	25/08/2025	Update/Changes to personnel	HSE

Related Documents ( <i>Policies, Procedures or SOP</i> )	Ownership
None	N/A