



Pollution Incident Response Management Plan

**Trackable Waste Transport Licence
Glendenning Liquid Waste Facility
Seven Hills Liquid Treatment Facility
Berkeley Vale Hills Filter Aggregation Facility**

VERSION AND ISSUE:

Version 7 – May 2022

TABLE OF CONTENTS

| | |
|---|-----------|
| WHAT IS THIS PLAN ABOUT? | 3 |
| 1. CONTACT DETAILS – REGULATORY AUTHORITIES | 3 |
| 2. NOTIFICATION PROCEDURES | 3 |
| 3. PIRMP COMPLIANCE MATRIX | 3 |
| 4. AVAILABILITY OF PIRMPs | 11 |
| 5. ATTACHMENTS | 11 |
| <i>Attachment 1 – RA-06 Site Depot Risk Assessment</i> | |
| <i>Attachment 2 - RA-GEN-002 Site Emergency Identification and Analysis</i> | |
| <i>Attachment 3 - Emergency Procedure Guides</i> | |
| <i>Attachment 4 – FM-33 Emergency Action</i> | |
| <i>Attachment 5 – FM-50 Vehicle and Plant Spot Checklist</i> | |
| <i>Attachment 6 - TRN-14.01-01 Fire and Emergency-Truck</i> | |
| <i>Attachment 7 - TRN-14.01-02 Fire and Emergency – Site</i> | |
| <i>Attachment 8 - FM-25 Fire Fighting Equipment Register</i> | |
| <i>Attachment 9 - TRN-14.02-01 Emergency Team-Warden</i> | |
| <i>Attachment 10 - FM-39 Emergency Response Instructions</i> | |
| <i>Attachment 11 - FM-32 Emergency Reaction Debriefing</i> | |
| <i>Attachment 12 – Evacuation Diagrams</i> | |

What is this plan about?

The purpose of this document is to satisfy J.J. Richards & Sons Pty Ltd t/a JJ's Waste & Recycling (JJ's) obligations to prepare a Pollution Incident Response Management Plan ('PIRMP') as required by Section 153A of the *Protection of the Environment Operations Act 1997 (NSW)* ('the Act').

JJ's has prepared a PIRMP for the following activities:

- Licence No. 10870 - Liquid Waste Treatment Facility located at Units 23-24/20 Tucks Road, Seven Hills, NSW;
- Licence No 21053 – Liquid Waste Treatment Facility located at 14 Rayben Street, Glendenning, NSW;
- Licence No. 6427 - Transport of Trackable Waste across various locations in NSW; and
- Licence no. 11289 located at 15 Apprentice Drive, Berkely Vale NSW 2261. Note that the activities are limited to aggregation of waste oil filters within the Approved Lease Area (enclosed shed) as detailed within Attachment A of the Licence Compliance Checklist. The licensee is responsible for the PIRMP associated with the rest of the site and all other activities conducted.

1. Contact Details – Regulatory Authorities

Table 1 – Regulatory Authorities Details

| Regulatory Authorities | Contact Number |
|-------------------------|-----------------------------------|
| EPA NSW | 131 555 |
| WorkCover Authority | 131 050 |
| Ministry of Health | (02) 9391 9000 |
| Fire and Rescue NSW | 000 |
| Blacktown City Council | (02) 9839 6000 |
| Penrith City Council | (02) 4732 7777 |
| Other Local Authorities | Dependent on location of incident |

2. Notification Procedures

In accordance with the JJ's established Emergency Procedures, the following table identifies the notification responsibilities of the following personnel (where relevant):

Table 2 – Notification Responsibilities

| Regulatory Authorities | Contact Number |
|-------------------------|---|
| Emergency Team | To notify: <ul style="list-style-type: none"> ▪ All personnel on the site. |
| Communications Officer | To notify: <ul style="list-style-type: none"> ▪ Site manager/supervisor; ▪ Neighbours; and ▪ Emergency services. |
| Site Manager/Supervisor | To notify: <ul style="list-style-type: none"> ▪ HSEQ; and ▪ Assist the communications officer with relevant notifications where required. |
| HSEQ | To notify: <ul style="list-style-type: none"> ▪ Regulatory authorities i.e. the EPA where required. |

3. PIRMP Compliance Matrix

The purpose of this section is to outline the legislative requirements for a PIRMP under the Act and the *Protection of the Environment Operations (General) Regulation 2021 (NSW)* ('the Regs') and documents within Integrated Management System (IMS) which evidence compliance has been achieved.

JJ's IMS links all aspects of the Company's operations including quality, health, safety and environmental management. On a day-to-day basis, the IMS is implemented via a Site Based Management Plan, which provides guidelines on how an individual site can achieve compliance with the IMS and forms the basis of this PIRMP.

Table 3 – Compliance Matrix

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|--|----------------------------------|---|--|
| Written form and accessible | Reg 130 s153D the Act | The plan must be in written form and readily accessible. | The PIRMP is a written document. The document is available via the JJ's Website. Full copies relevant to each site are readily accessible onsite and will be provided to an EPA officer upon request. |
| Description and likelihood of hazards | Regs 131(1)(a) & (b) | <p>Plans must provide a description of the main hazards to human health or the environment associated with the activity being undertaken at the premises, the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood. Potential hazards could include the storage of chemicals, waste materials, wastewater such as effluent or contaminated stormwater, the potential failure of containment tanks, the uncontrolled release of gas, and the flooding of effluent storage dams.</p> <p>Licensees of a facility near a sensitive environment, such as a densely populated area, school, hospital or water body, must consider the increased risks of environmental or health impacts of a pollution incident.</p> <p>Licensees of a facility which is located near other facilities which handle dangerous or explosive materials must consider the likelihood of any impacts on neighbouring facilities and consider employing measures to reduce or minimise impacts from a pollution incident which could set off a pollution incident at those facilities.</p> | <p>Facilities Manual: Section 1 – Risk Management</p> <p>RA-06 Site Depot Risk Assessment - (Attachment 1)</p> <p>RA-GEN-002 Site Emergency Identification and Analysis - (Attachment 2)</p> |
| Pre-emptive actions to be taken | Regs 131(1)(c) & 131(2)(d) | <p>Plans must include detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises. Pre-emptive actions can include the provision and use of spill containment kits, the installation and operation of stormwater cut-off valves, and the installation and use of fire-containment water tanks.</p> <p>Plans must include pre-emptive actions for trackable waste transporters to avoid the escape of waste during transportation. Vehicles must carry a copy of the environment protection licence, and a spill kit during all transportation. They are also required to carry any Guide set out in the yellow section of <i>HB 76:2010, Dangerous Goods – Initial Emergency Response Guide</i> applicable to the waste being transported.</p> | <p>Facilities Manual: Section 1 – Risk Management; Section 22.4 – Spills Section 20 – Incident Management Section 21 – Emergency Management</p> <p>Emergency Procedure Guides - (Attachment 3)</p> <p>FM-33 Emergency Action - (Attachment 4)</p> <p>FM-50 Vehicle and Plant Spot Checklist - (Attachment 5)</p> |

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|--------------------------------|----------------------|---|---|
| | | <p>Vehicles must ensure that incompatible wastes are not transported together, and any liquid waste, or waste that has been segregated is not mixed with other wastes. Transporters must ensure that waste is covered during transportation.</p> <p>Transporters of liquid waste must also ensure that the waste is able to be sampled by the release of suitable and accessible valves.</p> | <p>TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6)</p> <p>TRN-14.01-02 Fire and Emergency - Site - (Attachment 7)</p> <p>All vehicles used to transport trackable liquid waste have accessible sampling points.</p> |
| Inventory of pollutants | Regs 131(1)(d) & (e) | <p>Plans must include an inventory of potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises. Pollutants can include, but are not limited to, chemicals used in cleaning or production processes, fuels and lubricants used for equipment or machinery, gas cylinders, waste materials or wastewater, effluents and sediment-contaminated stormwater.</p> <p>Details of the pollutant storage locations, including underground storage tanks and storage methods, must also be included. See the requirement for a map in Section 3.3.8 below.</p> | <p>Facilities Manual Section 15 Managing Hazardous Chemicals on Site.</p> <p>Site Plan.</p> |
| Safety equipment | Reg 131(1)(f) | <p>Plans must include a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident. Specific details must be provided in relation to any site or activity-specific safety equipment and must include the location where this equipment is stored and the material safety data information for any chemicals or fuels used or stored at the premises. For example, this could include specific personal protective equipment required for the handling of hazardous chemicals or radioactive substances, specific gas monitoring meters used to monitor gas leaks from tanks, floating booms used to contain spills on water bodies, and specific spill containment equipment.</p> | <p>Emergency Diagram – shows location of firefighting equipment - (Attachment 12)</p> <p>Spill management and spill kit contents: Facilities Manual: Section 22.4– Spills</p> <p>Emergency Management – Facilities Manual: Section 21.2 – Emergency Preparedness; Section 21.3 – Emergency Equipment; Section 21.4 – Fire Safety Maintenance.</p> <p>FM-25 Fire Fighting Equipment Register - (Attachment 8)</p> <p>TRN-14.02-01 Emergency Team-Warden - (Attachment 9)</p> <p>FM-39 - Emergency Response Instructions - (Attachment 10)</p> <p>TRN-14.01-01 Fire and Emergency-Truck -</p> |

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|--|--|---|--|
| | | | <p>(Attachment 6)</p> <p>TRN-14.01-02 Fire and Emergency – Site - (Attachment 7)</p> |
| Contact details | <p>Regs 131(1)(g), (h) & 131(2)(a), (b)</p> | <p>Individuals who are responsible for activating the plans and managing the response; those authorised to notify relevant authorities, including all five relevant authorities under section 148 of the POEO Act; and those responsible for managing the response to a pollution incident. The EPA has developed a notification protocol (available here).</p> <p>In addition, plans must include the contact details of the EPA, the local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW, relevant to the licensee's premises. The contact details of any other organisation or agency that needs to be advised of the incident should also be included in plans, for example the Department of Planning and Infrastructure, and Department of Primary Industry.</p> | <p>FM-33 Emergency Action - (Attachment 5)</p> <p>Facilities Manual: Section 20.6 – Environmental Incidents.</p> |
| Communicating with neighbours and the local community | <p>Regs 131(1)(i) & 131(2)(c)</p> <p>s153C the Act</p> | <p>Communicating with neighbours and the local community is an important element in managing the response to any incident. Plans must include details of the mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by an incident occurring on the premises. Communication mechanisms can include incident notifications placed on the licensee's website or social media networks (such as Twitter or Facebook); the use of telephone calls or SMS or other messaging systems; emails to community representatives (for example, a protocol agreed to via a community consultative committee process); and letterbox drops and doorknocking of affected community members, as appropriate to the circumstances.</p> <p>Plans must also include any specific information that could be provided to the community so it can minimise the risk of harm. For example, this could include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water in creeks or rivers affected, or likely to be affected, by a pollutant discharge.</p> <p>The licensee must consider the types of pollution incidents that are likely to occur at the premises. Examples are discharge of a pollutant to a stormwater system or creek, or an unplanned release of an air pollutant into the atmosphere. In the example of the discharge to the stormwater system, the licensee must notify premises that are adjacent to the stormwater system or creek and consider any downstream users, such as holders of</p> | <p>FM-33 Emergency Action - (Attachment 4)</p> <p>RA-GEN-002 Site Emergency Identification and Analysis - (Attachment 2)</p> |

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|---|---|--|---|
| | | <p>water irrigation licences, recreational water facilities and oyster growers.</p> <p>In determining the extent of community notification for potential air emissions, the licensee should consider aspects such as the type of pollutant, prevailing winds, height and magnitude of an emission, as well as the location of any on-site fallout or off-site impacts, the likelihood of the pollutant reaching ground level, and possible impacts on sensitive receptors.</p> <p>As the location, geography and proximity to neighbours varies for each licensed premises, each licensee must consider the types of pollutant incidents that are likely to occur at the premises and the extent to which those incidents may have an impact on neighbouring industrial, residential or community premises. Consideration must be given to notifying any sensitive premises in close proximity, such as schools, pre-schools, nursing homes and hospitals.</p> | |
| Minimising harm to persons on the premises | 131(1)(j) – the Regs | <p>Plans must include any actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises should an incident occur. These can include the activation of evacuation procedures, clearly advertising muster locations to site personnel, or activating visible and/or audible warning alarms. Consideration should also be given to having available at short notice suitable consultants to provide expert medical, toxicology or environmental impact advice.</p> | <p>Facilities Manual: Section 21 Emergency Management</p> <p>FM-39 Emergency Response Instructions - (Attachment 11)</p> <p>FM-33 Emergency Action - (Attachment 4)</p> <p>Evacuation Diagram - (Attachment 12)</p> |
| Maps | 131(1)(k) – the Regs | <p>Plans must include a detailed map (or set of maps) showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises (including underground tanks), the location of any stormwater drains on the premises, overland flows, drainage pathways and the discharge locations of the stormwater drains to the nearest watercourse or water body.</p> <p>Maps should also show the location of safety equipment, pollution control and pollution response equipment, mains and master switches and the PIRMP and emergency plans.</p> | <p>Evacuation Diagram - (Attachment 12)</p> |
| Actions to be taken during or immediately after a pollution incident | 131(1)(l) – the Regs s153C - the Act | <p>Plans must include detailed descriptions of the actions that will be taken by the licensee immediately after a pollution incident to reduce or control any pollution. These should include, as a minimum, early warnings, updates and actions to be taken during and after an incident. Actions may include the deployment of spill containment equipment, activation of stormwater shut-off valves, and shutdown of processes or equipment. Consideration must</p> | <p>Facilities Manual: Section 20.6 – Environmental Incidents</p> <p>Emergency Procedure Guides - (Attachment 3)</p> |

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|-----------------------|--|--|---|
| | | <p>also be given to assessing how any clean up from an incident will be undertaken, including the procedures to be followed such as the engagement of contractors and use of clean-up equipment like waste disposal tankers and waste disposal facilities.</p> <p>As the costs associated with the clean-up of an incident can be significant – in past cases these have been in excess of \$1 million – consideration must also be given to funding arrangements, such as taking out appropriate insurance or having contingency funds available. The cost of any clean up that is undertaken by emergency response agencies and the EPA will generally be recovered from the company or individual responsible for the pollution incident.</p> | <p>Facilities Manual: Section 21 Emergency Management</p> <p>FM-39 Emergency Response Instructions - (Attachment 10)</p> <p>TRN-14.02-01 Emergency Team-Warden - (Attachment 9)</p> <p>TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6)</p> <p>TRN-14.01-02 Fire and Emergency – Site - (Attachment 7)</p> |
| Staff training | 131(1)(m) & 131(2)(e) – the Regs | <p>Plans must include details on the nature and objectives of any staff training program on implementing the plans. Details of the training program must include the frequency of training and how the records of any training are kept. Suitable training could include toolbox talks, formal staff training on incident management, and undertaking simulated incident exercises, including with emergency services. The training needs to be suitable for the level of risk and likelihood of incidents at the premises.</p> | <p>FM-32 Emergency Reaction Debriefing - (Attachment 11)</p> <p>TRN-14.02-01 Emergency Team-Warden - - (Attachment 9)</p> <p>TRN-14.01-01 Fire and Emergency- Truck - (Attachment 6)</p> <p>TRN-14.01-02 Fire and Emergency - Site - (Attachment 7)</p> |
| Testing plans | 131(1)(n), (o), (p) & 131(2)(f), (g) & 133 – the Regs s153E - the Act | <p>Plans must be tested routinely at least once every 12 months. The testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner.</p> <p>Usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including effectiveness of training.</p> <p>Plans must include the manner in which they are to be tested and maintained, the dates on which they have been tested, the names of the staff members who carried out the testing, and the dates they were updated.</p> | <p>PIRMP will be tested:</p> <ul style="list-style-type: none"> ▪ annually as part of the annual emergency drill; and/or ▪ within one (1) month of any pollution incident occurring. <p>Date of test, person testing is recorded on FM-32 Emergency Reaction Debriefing - (Attachment 11)</p> <p>Facilities Manual: Section 21 Emergency Management</p> |

| Required Details | Legislation | EPA Guideline | JJ's IMS |
|-----------------------------|-----------------------------------|--|---|
| Community engagement | 131(2)(c) - the Regs | Plans must include community engagement protocol that includes notifying people living or working in the vicinity of a pollution incident and keeping them informed of relevant matters. | Emergency Procedure Guides - (Attachment 3) FM-33 Emergency Action - (Attachment 4) Facilities Manual : Section 21 Emergency Management |
| PIRMP Availability | 132 – the Regs s153D - the Act | A plan must be made readily available at the request of an EPA office and at the premises / where the relevant activity takes place. The plan must be made publicly available after 14 days after its preparation in a prominent position | Plans can be accessed via the JJ's website (available here). Plans must be made available to any authorised officer upon request. |

4. Availability of PIRMPs

Full copies of each PIRMP for the above-mentioned activities are maintained at the following locations:

- 14 Rayben Street, Glendenning NSW;
- Units 23-24/20 Tucks Road, Seven Hills, NSW; and
- 15 Apprentice Drive, Berkeley Vale NSW.

A full copy of a site specific PIRMP can be made available upon written request.

5. Attachments

- Attachment 1 - RA-06 Site Depot Risk Assessment
- Attachment 2 - RA-GEN-002 Site Emergency Identification and Analysis
- Attachment 3 - Emergency Procedure Guides
- Attachment 4 – FM-33 Emergency Action
- Attachment 5 – FM-50 Vehicle and Plant Spot Checklist
- Attachment 6 - TRN-14.01-01 Fire and Emergency-Truck
- Attachment 7 - TRN-14.01-02 Fire and Emergency – Site
- Attachment 8 –FM-25 Fire Fighting Equipment Register
- Attachment 9 - TRN-14.02-01 Emergency Team-Warden
- Attachment 10 - FM-39 Emergency Response Instructions
- Attachment 11 - FM-32 Emergency Reaction Debriefing
- Attachment 12 – Evacuation Diagram

Attachment 1 – RA-06 Site Depot Risk Assessment

Attachment 2 - RA-GEN-002 Site Emergency Identification and Analysis

Attachment 3 - Emergency Procedure Guides

Attachment 4 – FM-33 Emergency Action

Attachment 5 – FM-50 Vehicle and Plant Spot Checklist

Attachment 6 - TRN-14.01-01 Fire and Emergency-Truck

Attachment 7 - TRN-14.01-02 Fire and Emergency – Site

Attachment 8 - FM-25 Fire Fighting Equipment Register

Attachment 9 - TRN-14.02-01 Emergency Team-Warden

Attachment 10 - FM-39 Emergency Response Instructions

Attachment 11 - FM-32 Emergency Reaction Debriefing

Attachment 12 – Evacuation Diagrams