

Pollution Incident Response Management Plan

Trackable Waste Transport Licence
Glendenning Liquid Waste Facility
Seven Hills Liquid Treatment Facility
St Marys Recycling Facility

Version: 3
May 2018



Commercial in Confidence



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1. Scope

The purpose of this document is to satisfy J.J. Richards & Sons Pty Ltd.'s (J.J. Richards) obligations under Section 153A of the Protection of the Environment Operations Act 1997 (NSW).

J.J. Richards has prepared a Pollution Incident Response Management Plan (PIRMP) for the following activities:

- Licence No. 20640 – Recycling Facility located at 8 Kommer Place, St Marys NSW;
- 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; and
- Licence No. 6427 - Transport of Trackable Waste across various locations in NSW.

2. Contact Details for Regulatory Authorities

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

3. Notification Procedures

In accordance with J.J. Richards & Sons Pty Ltd (J.J. Richards) established Emergency Procedures, the following table identifies the notification responsibilities of the following personnel (where relevant):

Position	Notification Responsibilities
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">▪ Legal; and▪ Assist the communications officer with relevant notifications where required.
Legal	To notify: <ul style="list-style-type: none">▪ Regulatory authorities i.e. the EPA where required.

4. PIRMP Compliance Matrix

The purpose of this section is to outline the legislative requirements for a PIRMP under the *Protection of the Environment Operations Act 1997* (NSW) and the *Environment Operations (General) Regulations 2009* (NSW) and documents within the Integrated Management System (IMS) which evidence compliance has been achieved.

JJR's IMS which 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.

Required Details	EPA Guideline	JJR IMS
<p>Description and likelihood of hazards [clause 98C (1)(a) and (b)]</p>	<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>RA-GEN-001 Site Depot Risk Assessment (Attachment 1)</p> <p>RA-GEN-002 Site Emergency Identification and Analysis (Attachment 2)</p>
<p>Pre-emptive actions to be taken [clause 98C(1)(c) & 98C(2)(d)]</p>	<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>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>SBMP-18.05-00 Spill Management (Attachment 3)</p> <p>Emergency Procedure Guides (Attachment 4)</p> <p>SBMP-14.01-00 Emergency Planning Procedure (Attachment 5)</p> <p>SBMP-14.01-05 Emergency Action (Attachment 6)</p> <p>SBMP-09.02-03 Vehicle and Plant Spot Checklist (Attachment 7)</p> <p>TRN-14.01-01 Fire and Emergency-Truck (Attachment 8)</p> <p>TRN-14.01-02 Fire and Emergency –Site (Attachment 9)</p> <p>SBMP 18.0 Waste Transport Manual (Attachment 10)</p>

Required Details	EPA Guideline	JJR IMS
		All vehicles used to transport trackable liquid waste have accessible sampling points.
Inventory of pollutants [clause 98C(1)(d) and (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>	SBMP-10.01-00 Hazardous Chemicals (Attachment 11)
Safety equipment [clause 98C(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.</p> <p>SBMP-18.05-00 Spill Management (Attachment 3)</p> <p>SBMP-18.05-01 Spill Management Matrix (Attachment 12)</p> <p>SBMP-09.01-01 Specific HSE Systems Assessment (Attachment 13)</p> <p>SBMP-09.01-02 Fire Fighting Equipment Register (Attachment 14)</p> <p>TRN-14.02-01 Emergency Team-Warden (Attachment 15)</p> <p>TRN-14.01-01 Fire and Emergency-Truck (Attachment 8)</p> <p>TRN-14.01-02 Fire and Emergency –Site (Attachment 9)</p>

Required Details	EPA Guideline	JJR IMS
<p>Contact details [clause 98C(1)(g) and (h) & clause 98C(2)(a) and (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 at www.environment.nsw.gov.au/pollution/notificationprotocol.htm).</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>SBMP-14.01-05 Emergency Action (Attachment 6)</p> <p>SBMP-13.01-04 Environmental Incident Management (Attachment 16)</p>
<p>Communicating with neighbours and the local community [clause 98C(1)(i)]</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 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</p>	<p>SBMP-14.01-05 Emergency Action (Attachment 6)</p> <p>RA-GEN-002 Site Emergency Identification and Analysis (Attachment 2)</p>

Required Details	EPA Guideline	JJR IMS
	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.	
Minimising harm to persons on the premises [clause 98C(1)(j)]	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.	SBMP-14.01-00 Emergency Planning Procedure (Attachment 5) SBMP-14.01-13NSW Emergency Response Instructions (Attachment 17) Emergency Diagrams (Evacuation Diagrams) SBMP-14.01-05 Emergency Action (Attachment 6)
Maps [clause 98C(1)(k)]	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, the location of any stormwater drains on the premises, and the discharge locations of the stormwater drains to the nearest watercourse or water body.	Emergency Diagrams (Evacuation Diagrams)
Actions to be taken during or immediately after a pollution incident [clause 98C(1)(l)]	<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 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>	SBMP-14.01-00 Emergency Planning Procedure (Attachment 5) SBMP-14.01-13NSW Emergency Response Instructions (Attachment 17) TRN-14.02-01 Emergency Team-Warden (Attachment 15) TRN-14.01-01 Fire and Emergency-Truck (Attachment 8) TRN-14.01-02 Fire and Emergency –Site (Attachment 9)
Staff training [clause 98C(1)(m) & 98C(2)(e)]	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	SBMP-14.01-02 Emergency Reaction Debriefing (Attachment 18)

Required Details	EPA Guideline	JJR IMS
	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.	TRN-14.02-01 Emergency Team-Warden (Attachment 15) TRN-14.01-01 Fire and Emergency- Truck (Attachment 8) TRN-14.01-02 Fire and Emergency –Site (Attachment 9)
Testing plans [clause 98C(1)(n),(o) and (p) & 98C(2)(f) and (g)]	<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>	SBMP-14.01-02 Emergency Reaction Debriefing (Attachment 18) SBMP-14.01-00 Emergency Planning Procedure (Attachment 5)
Community engagement [clause 98C(2)(c)]	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 4) SBMP-14.01-05 Emergency Action (Attachment 6) SBMP-14.01-00 Emergency Planning Procedure (Attachment 5)

5. 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;
- 8 Kommer Place, St Marys NSW.

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

6. Attachments

- Attachment 1 - RA-GEN-001 Site Depot Risk Assessment
- Attachment 2 - RA-GEN-002 Site Emergency Identification and Analysis
- Attachment 3 - SBMP-18.05-00 Spill Management
- Attachment 4 - Emergency Procedure Guides
- Attachment 5 - SBMP-14.01-00 Emergency Planning Procedure
- Attachment 6 – SBMP-14.01-05 Emergency Action
- Attachment 7 - SBMP-09.02-03 Vehicle and Plant Spot Checklist
- Attachment 8 - TRN-14.01-01 Fire and Emergency-Truck
- Attachment 9 - TRN-14.01-02 Fire and Emergency – Site
- Attachment 10 - SBMP 18.0 Waste Transport Manual
- Attachment 11 - SBMP-10.01-00 Hazardous Chemicals
- Attachment 12 - SBMP-18.05-01 Spill Management Matrix
- Attachment 13 – SBMP-09.01-01 Specific HSE Systems Assessment
- Attachment 14 – SBMP-09.01-02 Fire Fighting Equipment Register
- Attachment 15 - TRN-14.02-01 Emergency Team-Warden
- Attachment 16 - SBMP-13.01-04 Environmental Incident Management
- Attachment 17 - SBMP-14.01-13NSW Emergency Response Instructions
- Attachment 18 - SBMP-14.01-02 Emergency Reaction Debriefing