

Pollution Incident Response Management Plan - NSW -

VERSION AND ISSUE:

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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') and Southern Oil Collections ('SOC') 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 10060 – Liquid Waste Storage and Transfer Facility located at Treatment Works Access Road, Forest Hill NSW;
- Licence No 6427 - Transport of Trackable Waste across various locations in NSW;
- Licence No 6099 – Waste Processing and Storage Facility located at 1 Daintree Place, Gosford West NSW. Note that the licensee for Gosford is listed as SOC; 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
NSW Health	(02) 9391 9000
Fire and Rescue NSW	000
Gosford Fire & Rescue	(02) 4337 9700
Berkely Vale Fire & Rescue	(02) 9493 1228
Wagga Fire & Rescue	(02) 6921 4375
Blacktown City Council (Glendenning)	(02) 5300 6000 After Hours Emergency – 1300 133 491
Penrith City Council (Seven Hills)	(02) 4732 7777
Central Coast Council (Berkeley Vale and Gosford)	(02) 4306 7900 After Hours Emergency – (02) 4306 7900
Wagga Wagga City Council	(02) 6926 9100 or 1300 292 442
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 - Site Incident

Role	Responsibility	Contact Number
Emergency Team	In the event of an incident at a JJ's site, the internal site emergency team must immediately notify all personnel on the site in accordance with: <ul style="list-style-type: none"> ▪ EM-01 Emergency Response Team Responsibilities – Chief 	Emergency team contact numbers listed within FM-33 Emergency Action .

Role	Responsibility	Contact Number
	<p><u>Warden</u>;</p> <ul style="list-style-type: none"> ▪ <u>EM-02 Emergency Response Team Responsibilities – Warden</u>; and ▪ <u>EM-03 Emergency Response Team Responsibilities – Communication Officer</u>. <p>Relevant site emergency team listed within <u>FM-33 Emergency Action</u>.</p>	
<p align="center">Communications Officer</p>	<p>Responsible for activating the PIRMP, must follow responsibilities within <u>EM-03 Emergency Response Team Responsibilities – Communication Officer</u> and immediately notify:</p> <ul style="list-style-type: none"> ▪ Relevant site manager/supervisor. ▪ Affected neighbours; and ▪ Emergency services (where required). <p>Relevant site communications officer listed within <u>FM-33 Emergency Action</u>.</p>	<p>Site manager's / supervisors:</p> <ul style="list-style-type: none"> ▪ Glendenning Organics <ul style="list-style-type: none"> ○ Monique Bachtis (Sydney Facilities Manager) – [REDACTED]; or ○ Calla Pieters (Regional Manager – NSW Liquid Infrastructure) – [REDACTED]. ▪ Glendenning Oil <ul style="list-style-type: none"> ○ Matt McNulty (Operations Supervisor) – [REDACTED]; or ○ Calla Pieters (Regional Manager – NSW Liquid Infrastructure) – [REDACTED]. ▪ Seven Hills <ul style="list-style-type: none"> ○ Monique Bachtis (Sydney Facilities Manager) – [REDACTED]; or ○ Calla Pieters (Regional Manager – NSW Liquid Infrastructure) – [REDACTED]. ▪ Wagga <ul style="list-style-type: none"> ○ Adrian Southwell (Branch Manager) – [REDACTED]; or ○ Michael Hannah (Area Manager – Southern NSW) – [REDACTED]. ▪ Gosford <ul style="list-style-type: none"> ○ Matt McNulty (Operations Supervisor) – [REDACTED]; or ○ Calla Pieters (Regional Manager – NSW Liquid Infrastructure) – [REDACTED].
<p align="center">Site Manager/Supervisor</p>	<p>To immediately notify and provide one (1) hourly updates to:</p> <ul style="list-style-type: none"> ▪ Land & Environment; and ▪ HSEQ. <p>To:</p> <ul style="list-style-type: none"> ▪ Assist the emergency team with relevant notifications where required; and ▪ Contact ISS First Response if required – 1300 131 001. 	<p>Land & Environment:</p> <ul style="list-style-type: none"> ▪ Amiee Murphy (Lawyer) – [REDACTED]; or [REDACTED]; or ▪ Kurt Whalan (General Counsel – Environment) – [REDACTED]. <p>HSEQ:</p> <ul style="list-style-type: none"> ▪ Ben Presser (HSE) – [REDACTED]; or ▪ Scott Campbell (Group Manager – Health & Safety) – [REDACTED].

Role	Responsibility	Contact Number
	Note: site manager / supervisor may be part of the site emergency team also and have additional responsibilities as a deputy warden, warden or communications officer.	
Land & Environment	Amiee Murphy (Lawyer) or Kurt Whalan (General Counsel – Environment) to notify EPA NSW where required in accordance with the internal Land & Environment protocol.	EPA NSW – 131 555.
HSEQ	Ben Presser (HSE) or Scott Campbell (Group Manager – Health & Safety) to notify SafeWork NSW where required.	SafeWork NSW – 13 10 50.

Table 3 – Notification Responsibilities - Transport Incident

Role	Responsibility	Contact Number
Vehicle operator	<p>Follow the relevant EPG and contact relevant supervisor / manager of the incident immediately and where safe to do so.</p> <p>Each driver has contact details of supervisor / manager and a radio is available in the cabin with direct contact to Operations.</p>	<ul style="list-style-type: none"> ▪ Newcastle <ul style="list-style-type: none"> ○ Tyler Tildesley (Operations Manager) - [REDACTED]; or ○ Ricky Martin (Branch Manager) - [REDACTED]. ▪ Wagga Wagga <ul style="list-style-type: none"> ○ Adrian Southwell (Branch Manager) - [REDACTED]; or ○ Michael Hannah (Area Manager – Southern NSW) - [REDACTED]. ▪ Sydney <ul style="list-style-type: none"> ○ Mark Coble (Operations Manager) – [REDACTED]; or ○ Wayne O’Conner (Regional Manager – NSW) – [REDACTED].
Transport Manager/Supervisor	<ul style="list-style-type: none"> ▪ Ascertain the nature of the emergency and implement appropriate action with reference to the relevant internal EPG. ▪ Confirm that the appropriate Emergency Service has been notified (if required) - Call 000 if not. ▪ Provide instructions to JJ’s employees assisting in the incident. ▪ Immediately notify Land & Environment and provide one (1) hourly updates. ▪ Immediately notify HSEQ and provide one (1) hourly updates. ▪ Notify any surrounding premises / businesses to notify them of the emergency (if emergency could affect their occupants or property) and advise of the following: <ul style="list-style-type: none"> ○ What the emergency is i.e. fire; 	<p>Land & Environment:</p> <ul style="list-style-type: none"> ▪ Amiee Murphy (Lawyer) – [REDACTED]; or ▪ Kurt Whalan (General Counsel – Environment) - [REDACTED]. <p>HSEQ:</p> <ul style="list-style-type: none"> ▪ Ben Presser (HSE) - [REDACTED]; or ▪ Scott Campbell (Group Manager – Health & Safety) – [REDACTED].

Role	Responsibility	Contact Number
	<ul style="list-style-type: none"> ○ Whether the emergency services have been called; ○ The location of the emergency in comparison to their premises. ▪ In the event the emergency continues after two (2) hours, updates must be provided to the affected premises at least every two (2) hours. ▪ Call premises to notify them that the emergency has been appropriately managed and no longer poses a risk to their premises. ▪ Compile a report of the actions taken during the emergency for the debrief. <p>Note: the Transport Manager / Supervisor may delegate the above-mentioned responsibilities to another appropriate and responsible JJ's employee.</p>	
Land & Environment	Amiee Murphy (Lawyer) or Kurt Whalan (General Counsel – Environment) to notify the EPA where required in accordance with the internal Land & Environment protocol.	<ul style="list-style-type: none"> ▪ EPA NSW – 131 555.
HSEQ	Ben Presser (HSE) or Scott Campbell (Group Manager – Health & Safety) to notify SafeWork NSW where required.	<ul style="list-style-type: none"> ▪ SafeWork NSW – 13 10 50.

3. Updates & Reviews

Land & Environment review the PIRMP on a quarterly basis to ensure:

- all the sites listed are still accurate;
- all contacts listed are the same;
- have any sections of the legislation changed re. the PIRMP?
 - if so,
 - do the Act/Reg name / year need updating?
 - do the section numbers need updating?
 - do the section headings need updating?
 - is further information required to be included?
- are all the internal training / procedures / manual section references, correct?

The review is set within the electronic calendars and any amendments are tracked via tracked changes and saved to the internal Land & Environment PIRMP file for NSW.

Following the annual evacuation test for each site / transport operation, the relevant managers will advise Land & Environment of any amendments required to the PIRMP. Land & Environment will liaise with the managers, make the changes and advise all relevant personnel of the updates made to the PIRMP and provide with an updated copy for their records.

4. Management Acknowledgement

Each relevant manager / supervisor of the site(s) and/or transport operations the PIRMP is relevant to must sign off on the acknowledgement in Attachment 15 to confirm that they understand the PIRMP and their responsibilities as the relevant manager / supervisor.

5. 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 2022* (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 – Site Based Requirements

Required Details	Legislation	EPA Guideline	JJ's IMS
Written form and accessible	<p>s 71(a) & 74 (1) - the General Regulation</p> <p>s153C & s153D the Act</p>	<p>The plan must be in written form and available at the premises so it can be provided to an authorised EPA officer on request.</p> <p>Safeguards must be put in place to ensure the PIRMP is readily accessible in the case of power failure or internet outage. A hard copy of the PIRMP is recommended to be maintained at the licensed premises or where the activity takes place.</p>	<p>The PIRMP is a written document. The document is available via the JJ's Website.</p> <p>Full hard copies relevant to each site are readily accessible onsite and will be provided to an EPA officer upon request.</p>
Description and likelihood of hazards	<p>s 72(a) & 72(b) - the General Regulation</p>	<p>Plans must provide a description of the main hazards to human health and/or the environment associated with the activity being undertaken at the premises or where the activity takes place, 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 spills and unintended discharges such as from:</p> <ul style="list-style-type: none"> ▪ Sedimentation dams ▪ Material transfer points ▪ Workshops ▪ Wastewater or chemical storage areas; ▪ Underground and above ground storage tanks ▪ Fuel tanks ▪ Generation or storage areas for waste materials. <p>Other potential hazards may be due to the failure of plant or equipment, for example:</p> <ul style="list-style-type: none"> ▪ Ruptured containment tanks ▪ Uncontrolled release of gas ▪ Effluent storage dam failures ▪ Breakage of pipes ▪ Malfunctioning of valves ▪ Disruption to manufacturing processes ▪ Power failure ▪ Fire. <p>Plans must also consider the range of circumstances that could contribute to a pollution incident such as:</p> <ul style="list-style-type: none"> ▪ Power failure ▪ Natural disasters such as bushfires, floods or major storm events ▪ Materials and equipment brought onto the premises by contractors ▪ Vegetation and other combustible material on or bordering the premises. 	<p>Refer to the Facilities Manual: Section 1 – Risk Management</p> <p><u>Site Risk Assessments</u> Each site is required to complete and maintain the following site-based risk assessments:</p> <ul style="list-style-type: none"> ▪ RA-06 Site Depot Risk Assessment - (Attachment 1) ▪ RA-GEN-002 Site Emergency Identification and Analysis - (Attachment 2) <p>These assessments include a review/description of the potential hazards to human health and/or the environment associated with the activities undertaken at the site. The assessments also review the likelihood of such hazards occurring and ensure there are appropriate controls in place to manage the risks. Refer to Section 22 – Environmental Management of the Facilities Manual for guidance on environmental risk and management.</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
		<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>Pre-emptive actions to be taken</p>	<p>s 72(c) - the of the General Regulation</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>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) available onsite for quick access and use.</p> <p>FM-33 Emergency Action - (Attachment 4) provides details of internal and external contacts in the event of an incident.</p> <p>All employees appropriately trained in internal training packages for emergency preparedness:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency - Site - (Attachment 7)
<p>Inventory of pollutants</p>	<p>s 72(d) and 72(e) - the General Regulation</p>	<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</p>	<p>Facilities Manual Section 15 Managing Hazardous Chemicals on Site.</p> <p>Glendenning & Seven Hills hold manifest quantities onsite and keep an updated copy of their Manifest (Attachment 14).</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
		a map in Section 3.3.8 below.	Site plans identify areas onsite containing wastes and/or chemicals.
Safety equipment	s 72(f) - the General Regulation	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>Emergency Diagram – shows location of firefighting equipment - (Attachment 12)</p> <p>Spill management and spill kit contents: Facilities Manual: Section 22.4– Spills. Site plans include locations of spill kits also (Attachment 13).</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>All employees are trained in fire and emergency management via our internal training modules:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6) TRN-14.01-02 Fire and Emergency – Site - (Attachment 7)
Contact details	s 72(g) - the General Regulation s153C - the Act	<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.</p> <p>In addition, plans must include the contact details of the EPA, the local council, NSW Health, SafeWork NSW, and Fire and Rescue NSW and/or Rural Fire Service, 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>Refer to:</p> <ul style="list-style-type: none"> ▪ Section 1 – Contact Details – Regulatory Authorities; and ▪ Section 2 – Notification Procedures. <p>FM-33 Emergency Action - (Attachment 5)</p> <p>Facilities Manual: Section 20.6 – Environmental Incidents.</p>
Communicating with neighbours	s 72(i) - the General	Communicating with neighbours and the local community is an important element in managing the response to any incident. Plans must include	FM-33 Emergency Action - (Attachment 4) provides:

Required Details	Legislation	EPA Guideline	JJ's IMS
<p>and the local community</p>	<p>Regulation</p>	<p>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.</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>	<ul style="list-style-type: none"> ▪ The site's emergency team members; and ▪ Surrounding neighbour contact details to enable quick notification. <p>In addition, the key contact details and relevant notification procedure is included within Section 1.</p> <p>Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within:</p> <ul style="list-style-type: none"> ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 11) <p>RA-GEN-002 Site Emergency Identification and Analysis - (Attachment 2)</p>
<p>Minimising harm to persons on the premises</p>	<p>s 72(j) - the General Regulation</p>	<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-33 Emergency Action - (Attachment 4) provides:</p> <ul style="list-style-type: none"> ▪ The site's emergency team members; and ▪ Contact details to enable quick notification. <p>In addition, the key contact details and</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
			<p>relevant notification procedure is included within Section 1.</p> <p>Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within:</p> <ul style="list-style-type: none"> ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 10) <p>Evacuation Diagrams clearly identified around the site - (Attachment 12)</p>
Maps	s 72(k) - the General Regulation	<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>Site plans/maps contain all relevant information in accordance with this requirement – (Attachment 13).</p>
Actions to be taken during or immediately after a pollution incident	s 72(l) - the General Regulation 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 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</p>	<p>Facilities Manual: Section 20.6 – Environmental Incidents provides the internal procedure which must be followed in the event of an incident.</p> <p>Emergency Procedure Guides - (Attachment 3). EPGs for spills and fires are available at the premises for use by any employee which provides clear instructions and guidance on initial management of the incident. Further to this, Section 1 provides the relevant responsibilities and notification procedures</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
		<p>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>during an incident.</p> <p>Facilities Manual: Section 21 Emergency Management</p> <p>Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within:</p> <ul style="list-style-type: none"> ▪ TRN-14.02-01 Emergency Team-Warden -(Attachment 9) ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 10) <p>All employees are trained in fire and emergency management via our internal training modules:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency – Site - (Attachment 7) <p>Notification requirements identified within Section 1.</p>
Staff training	s 72(m) - the General Regulation	<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>Emergency drills must be conducted at least annually as required by Section 21.2 of the Facility Operating Manual. Following the emergency training, FM-32 Emergency Reaction Debriefing - (Attachment 11), must be completed to identify:</p> <ul style="list-style-type: none"> ▪ The type of scenario conducted; ▪ The persons involved;

Required Details	Legislation	EPA Guideline	JJ's IMS
			<ul style="list-style-type: none"> ▪ The date/time of scenario; ▪ Procedures used as part of the scenario i.e. the PIRMP; and ▪ Feedback on the success of the scenario. <p>Where the site considers improvements are required to the PIRMP following a scenario, they must contact Land & Environment who will assist in the relevant amendments.</p> <p>Each member of the Emergency Team for the site is aware of their responsibilities pre, during and after an emergency. The responsibilities are clearly defined within:</p> <ul style="list-style-type: none"> ▪ TRN-14.02-01 Emergency Team-Warden -(Attachment 9) ▪ EM-01 Emergency Response Team Responsibilities – Chief Warden; ▪ EM-02 Emergency Response Team Responsibilities – Warden; and ▪ EM-03 Emergency Response Team Responsibilities – Communications Officer. (Attachment 10) <p>All employees are trained in fire and emergency management via our internal training modules:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency-Truck - (Attachment 6) ▪ TRN-14.01-02 Fire and Emergency – Site - (Attachment 7)
Testing plans	s 72(n), 72(o) and 72(p) - the General Regulation s153E - the	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. Usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including	PIRMP will be tested: <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.

Required Details	Legislation	EPA Guideline	JJ's IMS
	Act	effectiveness of training. 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.	Date of test, person testing is recorded on FM-32 Emergency Reaction Debriefing - (Attachment 11) Facilities Manual : Section 21 Emergency Management
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

Table 4 – Compliance Matrix – Hazardous Waste Transport Based Requirements

Required Details	Legislation	EPA Guideline	JJ's IMS
Written form and accessible	s71 and 74 - the General Regulation s153D – the Act	The plan must be in written form and available at the premises so it can be provided to an authorised EPA officer on request. Safeguards must be put in place to ensure the PIRMP is readily accessible in the case of power failure or internet outage. A hard copy of the PIRMP is recommended to be maintained at the licensed premises or where the activity takes place.	The PIRMP is a written document and is also available via the JJ's Website . For waste transport activities, EPGs are maintained within each JJ's vehicle as per Section 4.1 of the Transport Manual . A copy of the PIRMP can be made available to drivers where required.
Contact details	s73(b)(i) and (ii) - the General Regulation s153C – the Act	Plans must include the names, position titles and 24-hour contact details of those key individuals who are: <ul style="list-style-type: none"> a) responsible for activating the PIRMP; b) authorised to notify relevant authorities under section 148 of the POEO Act; c) responsible for managing the response to a pollution incident. The contact details relevant for the location where the incident occurs for: <ul style="list-style-type: none"> d) the EPA e) Fire and Rescue NSW and/or Rural Fire Service f) SafeWork NSW g) NSW Health 	Refer to: <ul style="list-style-type: none"> ▪ Section 1 – Contact Details – Regulatory Authorities; and ▪ Section 2 – Notification Procedures. In the event of an incident during transport operations, Supervisors responsible for activating the PIRMP will determine the relevant local council where the incident occurs. Such information is quickly accessible via the internet.

Required Details	Legislation	EPA Guideline	JJ's IMS
		<p>h) the local council.</p> <p>In addition to the details listed above, the PIRMP should include:</p> <ul style="list-style-type: none"> ▪ how the relevant local council and the relevant area health service (NSW Local Public Health Unit), will be determined as these will be specific to the location of the incident. ▪ Who will make that determination ▪ The contact details for those local councils and relevant health services ▪ who will contact those authorities (these tasks might be the responsibility of personnel at the waste transport company's base of operations). <p>The PIRMP should specify the roles of the driver and of the people implementing the notification requirements.</p>	
<p>Community engagement</p>	<p>s 73(b)(iii) - the General Regulation</p> <p>s153C – the Act</p>	<p>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.</p>	<p>In the event of an incident during transport, the relevant transport manager/supervisor resumes the role of 'Communications Officer' and is responsible for activating the PIRMP and notifying neighbours where required. Noting the manager/supervisor may delegate these duties to another responsible JJ's employee.</p> <p>Refer to Section 2 – Notification Procedures.</p>
<p>Actions to be taken</p>	<p>73(b)(iv) - the General Regulation</p> <p>s153C – the Act</p>	<p>Plans must include:</p> <ul style="list-style-type: none"> ▪ Detailed descriptions of the actions to be taken immediately after the pollution incident to reduce or control any pollution ▪ Pre-emptive actions for trackable waste transporters to avoid the escape of waste during transportation. <p>At a minimum, the pre-emptive actions should comply with the requirements set out in sections 70, 72 and 73 of the Protection of the Environment Operations (Waste) Regulation 2014. This includes:</p> <ul style="list-style-type: none"> ▪ 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. ▪ 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 	<p>Drivers are appropriately trained on our internal procedures, including:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency – Fire and Emergency Truck ; ▪ TRN-18.09-07 Hazardous Waste and Waste Tracking (NSW); ▪ TRN-GEN-100-04 Pre start & end of day checks; and ▪ TRN-GEN-100-03 Safe driving practices. <p><u>Emergency Management</u></p> <p>Vehicle or load fires and spills are managed in accordance with Section 16 of the Transport Manual. Spill kit requirements are outlined in Section 16.3 of the Transport Manual.</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
		<p>waste is transported in a manner that avoids spillage, leakage or escape (i.e. ensuring all waste is covered during transportation)</p> <ul style="list-style-type: none"> ▪ Transporters of liquid waste must also ensure that the waste is able to be sampled by the release of suitable and accessible valves. 	<p><u>Emergency Procedure Guides</u> Refer to the following Emergency Procedure Guides:</p> <ul style="list-style-type: none"> ▪ EPG-Spills: ▪ EPG All Other Vehicles: and ▪ EPG – Vehicle Fire Rear/Front/SOLO. <p><u>Vehicle Maintenance</u> As per Section 14 of the Transport Manual, all JJ's vehicles are maintained to a high standard by Fleet to ensure the vehicles are fit for use and purpose. Maintenance and inspection frequencies are recorded with GateKeeper to ensure schedules are complied with.</p> <p><u>Vehicle Documentation</u> A copy of the licence is maintained within each vehicle that conducts the transport of hazardous waste. Refer to Section 4.3 of the Transport Manual.</p> <p><u>Pre-start and end of day checks</u> Spill kit availability and vehicle condition are checked during the driver pre-start and end of day checks.</p>
<p>Staff training</p>	<p>73(b)(v) of the General Regulation</p>	<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>Employees involved in the transport of hazardous waste are required to undertake the following training packages:</p> <ul style="list-style-type: none"> ▪ TRN-14.01-01 Fire and Emergency – Fire and Emergency Truck ; ▪ TRN-18.09-07 Hazardous Waste and Waste Tracking (NSW); ▪ TRN-GEN-100-04 Pre start & end of day checks; and ▪ TRN-GEN-100-03 Safe driving practices. <p>LMS is utilised to track when refresher training is due for employees.</p>

Required Details	Legislation	EPA Guideline	JJ's IMS
			<p><u>Emergency Procedure Guides</u> Each vehicle has copies of the relevant Emergency Procedure Guides available for use:</p> <ul style="list-style-type: none"> ▪ <u>EPG-Spills:</u> ▪ <u>EPG All Other Vehicles: and</u> ▪ <u>EPG – Vehicle Fire Rear/Front/SOLO.</u>
<p>Testing plans</p>	<p>s73(b)(vi), 73(b)(vii) and 75 - the General Regulation</p>	<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>Testing of the PIRMP is conducted on a 12 monthly basis as part of a team brief or within one (1) month of an incident occurring involved trackable waste transport.</p> <p>An emergency practical drill (e.g., for a spill or fire) is undertaken with drivers to test the effectiveness of the PIRMP.</p> <p>FM-32 Emergency Reaction Debriefing - (<u>Attachment 11</u>) is used to record the scenario.</p>

6. Availability of PIRMPs

As required by section 153D of the Act, 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;
- Treatment Works Access Road, Forest Hill NSW;
- 1 Daintree Place, Gosford West NSW; and
- 15 Apprentice Drive, Berkeley Vale NSW.

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

7. 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 – EM-01, EM-02 & EM-03 Emergency Response Team Responsibilities
- Attachment 11 - FM-32 Emergency Reaction Debriefing
- Attachment 12 – Evacuation Diagram
- Attachment 13 – Site Plans
- Attachment 14 – Site Manifest (Glendenning & Seven Hills)

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Attachment 11 - FM-32 Emergency Reaction Debriefing

Attachment 12 – Evacuation Diagrams

Attachment 13 – Site Plans

Attachment 14 – Site Manifest (Glendenning & Seven Hills)

Attachment 15 – PIRMP Management Acknowledgement

I have read and understood the most current version of the Pollution Incident Response Management Plan ('PIRMP') and understand that I am responsible for activating the PIRMP in the event of a pollution incident which occurs onsite or during transport operations of which I manage / supervise.

I confirm that I understand:

- the notification requirements as identified within Section 2 of the PIRMP and my responsibilities associated with implementation of the PIRMP and subsequent notifications in the event of a pollution incident;
- all methods of compliance listed within the Section 5 compliance matrix and will ensure my site and/or transport operations meet compliance as stated; and
- that the PIRMP must be available on site, readily accessible and tested at least annually.

Date	Name	Position	Signature