

# **POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**OEMP 010 App F**

**February 2018**

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**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

Occupant: Wollongong Recycling (NSW) Pty Ltd

Postal Address: PO BOX 7, Enfield NSW 2136

Street Address: 50 Wyllie Road Kembla Grange NSW

Version: Revision 01: 12 February 2018

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## EXECUTIVE SUMMARY

This Pollution Incident Response Management Plan (PIRMP) has been developed for the facility operating under Environmental Protection Licence No. 20601 (the EPL). This document has been set out to fulfil the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* and contains the details required for pollution incident response management plans as set out within Part 3A of the *Protection of the Environment Operations (General) Regulation 2009*. The content of this plan includes:

- the procedures to be followed by the licence holder in notifying a pollution incident;
- a detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and
- the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and the persons through whom all communications are to be made.

As the nature of this site is changing, this PIRMP is a working document which requires changes to site conditions, operating procedures or licence requirements to be reviewed and incorporated where applicable.

Below is a summary of the **immediate** steps to be taken in the event of a pollution incident. In addition, a flowchart summarising the processes to be followed during a pollution incident is included at the end of the executive summary.

All staff shall be appropriately trained to identify and immediately respond to and notify the required authorities in the event of a pollution incident. It is important that all staff understand the statutory obligations to “Immediately” notify the relevant regulatory authorities in accordance with this *Pollution Incident Response Management Plan*.

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**TABLE 1 SUMMARY OF POLLUTION INCIDENT RESPONSE**

In the event of a pollution incident			Section of Report
<b>Step 1</b>	Gavin Visser, Site Supervisor	0401 724 355	Section 9
	Luke Miller, Operations Manager	0434 365 301	
	Ros Dent, Environmental Manager	0416 685 615	
<b>Step 2</b>	Is there an immediate threat to human health and the environment?	Call Emergency Services (000) or 112 for mobile phones	Section 9
<b>Step 3</b>	Does the site need to be evacuated?	Initiate evacuation procedure Safely follow pollution incident procedures	Evacuation Procedure Section 8.3.5
<b>Step 4</b>	Inform other relevant authorities of the incident	Follow the pollution incident plan contacting the relevant authorities as per 0	Section 9
<b>Step 5</b>	<b>Additional staff responsibilities</b>		
<b>Site Supervisor</b>	<b>Operations Manager</b>	<b>Environment Manager</b>	<b>Operational staff</b>
Activating the PIRMP and managing on site response	Assisting in providing resources to implement the PIRMP and on site response.	Call relevant regulatory authorities (EPA, WorkCover) following order specified in Table 8	Implementation of the PIRMP as directed by the Site Supervisor
Coordination of PIRMP and staff to barricade off area, emergency response procedures and notify other personnel onsite	Advice provided to General Manager on status of incident	Engage appropriate consultants to conduct environmental monitoring as per the OEMP	Carry out approved PIRMP response measures
Provide advice to Environment Manager on potential improvements to the PIRMP	Provide operational and management support to Site Supervisor to assist in response actions	Submit incident report to EPA.	Reports to Site Supervisor on status of emergency response
		Review PIRMP within 30 days of report.	

It is recommended that all sections of this document are read, and the appropriate training undertaken, prior to responding to an incident.

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# 1 INTRODUCTION

The *Protection of the Environment Operations Act 1997* (POEO Act) specifies within Section 147 that there is a duty to report a pollution incident if there is a threat or material harm to the environment. A pollution incident is defined as:

*“Pollution incident means 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.”*

## 1.1 Scope and objectives

This pollution incident response management plan (PIRMP) for the WRPL facility is a document set out to fulfil the requirements of Part 5.7A of the POEO Act and contains the details required for pollution incident response management plans as set out within Part 3A of the *Protection of the Environment Operations (General) Regulation 2009*. The content of this plan includes:

- the procedures to be followed by the licence holder in notifying a pollution incident;
- a detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and
- the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and the persons through whom all communications are to be made.

## 1.2 Site description and operations

The WRPL facility is located on 50 Wyllie Road Kembla Grange NSW, 12 km south of Wollongong (see Figure 1).

The nature of the waste that WRPL facility accepts includes:

- asphalt, concrete, rock, brick and tile;
- construction and demolition waste;
- green and timber waste;
- soils and mixed fill;
- steel;
- virgin excavated natural material (VENM)/ excavated natural material (ENM);
- general solid waste.

This facility is subject to the conditions of Development Application (DA) No. DA-2009/1153 and Environmental Protection Licence (EPL) No. 20601. The facility is supported by infrastructure including weighbridges, road networks, signage, truck wash facilities, sediment basin, telecommunications, power and water.



Figure 1. 50 Wyllie Road Kembla Grange.



### 1.3 Surrounding land use

The land use surrounding the site is summarised below.

North of Site:

- Residential development to the north and north east.

South of site:

- Kembla Grange Racecourse

East of site:

- Wollongong Lawn Cemetery

West of site:

- Wollongong Resource Recovery Park
- Whytes Gully Waste Depot
- VISY Recycling
- Patrick Autocare

## 2 DESCRIPTION AND LIKELIHOOD OF HAZARDS

### 2.1 Description of the licensed activity and hazards to human health and environment

This Pollution Incident Response Management Plan (PIRMP) addresses EPL licence No. 20601. Scheduled activities include:

- composting;
- waste storage;
- waste processing (non- thermal treatment);
- resource recovery.

From these scheduled activities, the hazards to human health and the environment have been identified. These include:

- water pollution;
- air pollution;
- pollution as a result of an unexpected material disposed on site.

Based on these activities, the severity of any pollution incident should be ranked based on the extent to which a pollution hazard poses to humans and the environment (**Error! Reference source not found.**).

**Table 1. Ranking of Pollution Incident**

Description of the pollution event	Severity score
Pollution could affect only those in the immediate vicinity	1
Pollution could affect others within the site	2
Pollution could affect surrounding neighbours	3

Table 2 identifies a list of foreseeable hazards that could occur on this site as a result of regular operating procedures. A risk management table is used to score the risk associated with any particular hazard.

**Table 2. Hazard Identification**

Type of Pollution	Hazard	Likelihood of hazard occurring	Consequence	Risk Score
<b>Soil and Water pollution</b>	Ground water pollution by migrating leachate	Possible	Moderate	2
	High sediment load into receiving waters	Rare	Minor	5
	Generation of excessive leachate	Unlikely	Minor	4
	Runoff of surface water from disturbed parts of site carrying high sediment loads	Possible	Minor	3
	Soil and water pollution as a result of refuelling plant and equipment on site	Unlikely	Moderate	3
<b>Air Pollution</b>	Excessive impurities, pathogens and/ or toxins admitted to the air	Rare	Minor	5
	Fire resulting in the production of hazardous smoke	Rare	Minor	5
	Uncontained asbestos in waste stream	Possible	Major	1
<b>Unexpected findings</b>	Discovery of orphan waste on site	Possible	Insignificant	6

Table 3. Risk Matrix

Likelihood	Consequences				
	Catastrophic Death Permanent disabling injury or extensive permanent environmental damage	Major Extensive permanent injury or extensive temporary or minor permanent environmental damage	Moderate Significant non- permanent injury. Overnight hospitalisation. Temporary environmental damage consultants required for assessment and clean-up	Minor Medical help needed. Treatment by medical professional. Environmental clean-up done in house	Insignificant Dealt with in house
Almost certain to occur in most circumstances	1	1	1	2	2
Likely to occur frequently	1	1	2	2	3
Possible and likely to occur at some time	1	1	2	3	4
Unlikely to occur but could happen	1	2	3	4	5
May occur but only in rare and exceptional circumstances	2	2	3	5	6

**Note:** Risk scores are developed prior to any control measures in place.

### 3 PRE-EMPTIVE ACTIONS TO BE TAKEN

As a condition of EPL No. 20601 the facility must have in place controls to manage water and air pollution that may occur on site. These are summarised below.

#### 3.1 Water pollution management

##### 3.1.1 Leachate collection system

An operating condition of the site is to ensure that all leachate generated from the indoor composting activities is collected and stored in leachate tanks, which will be pumped out and disposed of to sewer as required or reused as a moisture source for the composting operations.

Any surface water that comes in contact with unprocessed green waste, processed mulch and compost maturation stockpiles will be diverted via surface water drainage systems to surface water sediment retention dams. Water from the sediment retention dams will be reused on site for dust suppression and operational purposes. Scheduled sampling and testing of the sediment retention dam will monitor the water quality of the dam. Any surface water to be released from the sediment retention dams will be tested and assessed against EPL discharge criteria prior to any controlled release. In the event of any uncontrolled release from the sediment retention dam(s), unscheduled downstream water quality monitoring will be undertaken.

##### 3.1.2 Surface water and sediment

On the site, the surface water has been classified into three categories:

- Surface water diversion around site – perimeter surface water diversion drainage systems direct clean surface water around the site and minimise the generation of onsite storm water;
- clean stormwater – runoff from areas that have not been disturbed and the resulting surface water runoff is considered clean; and
- dirty stormwater – runoff from disturbed areas of the site with the potential to generate sediment and other contaminants.

The objectives of the surface water controls are to:

- prevent unacceptable sediment loads in receiving waters;
- prevent any surface water mixing with waste;
- prevent erosion of cover material and/or waste; and
- avoid generation of excessive leachate.

Current practice to control surface water and sediment includes stormwater diversion drains and sedimentation pond(s), which is managed in the following ways:

- Cut off drains and bunding around the perimeter of the site directs off-site generated stormwater around the site;
- Clean stormwater generated from undisturbed or stabilised areas on site is diverted via surface water drainage systems to the surface water sediment retention dams; and
- Surface water generated from operational areas, disturbed land areas or areas that may result in surface water contamination, is diverted via the surface and sub-surface drainage systems to the surface water sediment retention dam(s).

Erosion control methods to minimise erosion and sedimentation are used for all works where there is the potential for erosion to occur. The following measures used on site:

- diverting clean runoff away from disturbed area;
- reducing flow concentration by the construction of flow spreading bunds;
- reducing the length and steepness of slopes;

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- applying sedimentary control measures to intercept and retain sediment on site. (e.g. sediment fences, hay bales, existing table drains around perimeter and sedimentation ponds); and
- inspection of maintenance and cleaning program for control structures to maintain capacity and integrity.

### 3.1.3 Leachate, groundwater and surface monitoring

A regular ground and surface water monitoring program is undertaken in accordance with requirements specified in the EPL No. 20601.

### 3.1.4 Water pollution assessment program

If pollution is encountered during any monitoring event, an assessment and subsequent contingency plan had been detailed in the SMP and this document. The objective is to have procedures in place in the event that groundwater or surface water pollution is identified.

## 3.2 Management of material to site

The EPL specifies the permissible waste materials that are permitted to be accepted at the facility and the “Activity” that is allowed for each waste stream.

Pre-emptive measures that are in place to prevent a pollution incident as a result of unscheduled or non-permissible material being deposited on site are:

- signage to indicate the types of waste allowed and those prohibited;
- entry via the weighbridge;
- customer declaration of waste;
- incoming waste is screened and classified at the weighbridge and CCTV is available to visually inspect loads within trucks;
- screening and checking waste at tipping and processing areas;
- recording of all information and archived for at least four years;
- special waste to be immediately notified to the plant operator; and
- regular training of staff supervising tipping and screening of waste in waste classification procedures.

If a material is to be delivered under a resource recovery exemption, the material is required to comply with the conditions of a current general exemption or a specific exemption designated for this material. All resource recovery exemptions are made under clauses 51 and 51A of the *Protection of the Environment Operations (Waste) Regulation 2005*.

Each exemption will have individual requirements, however important information for the WRPL as a consumer or receiver of this material includes:

- the processor must provide confirmation of compliance to the consumer of the material certifying that it complies with the conditions of the exemption; and
- the consumer must keep records of the supplier and the quantities received.

WRPL requires that any waste materials of unknown classification must have a formal “Waste Classification Report” submitted by a suitably qualified laboratory and or consultancy to verify the waste classification prior to the waste being accepted on site. Any waste accepted for processing, storage or resource recovery at the site shall be assessed and classified in accordance with the NSW EPA Waste Classification Guidelines.

## 4 INVENTORY OF POLLUTANTS

The main potential pollutants associated with this site are:

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- Dust from processing operations, material stockpiles and vehicle movements on unsealed road surfaces;
- Water contaminates from leachate and surface waters that may contain sediments, organic contaminates, hydrocarbons and other possible contaminates;
- Wind-blown litter from waste depositing, stockpiling or loading activities;
- Diesel and petrol stored in bunded storage tanks (No more than 10,000 litres diesel and 40 litres petrol stored on site at any one time);
- Automotive fluids such as motor oil, transmission oils, brake fluid and the like (No more than 500 litres stored on site at any one time);
- Sewage stored in septic pump-out tanks (No more than 5,000 litres stored on site at any one time) and
- Domestic quantities of cleaning products;
- Firefighting water that has come into contact with waste (in the event of a fire)

For all chemicals stored on site, a material safety data sheet is stored in the site office and can be accessed by all staff.



## 5 SAFETY EQUIPMENT

### 5.1 Personal Protective Equipment

Personal Protective Equipment (PPE) has been identified in this document and the location of stores on site include the main weighbridge.

Staff members are issued with PPE, where required, that includes high visibility work wear, hard hats, leather gloves, protective eyewear and steel toe footwear. Additional safety equipment for designated tasks is located in the storage areas above. These include and are not restricted to:

- long and short PVC chemical resistant gloves;
- leather gloves;
- coveralls;
- safety goggles;
- gumboots;
- ear defenders; and
- P2 class face masks.

## 6 CONTACT DETAILS

Table 5 presents the list of contacts that may need to be contacted in the case of a pollution incident. Section 9 of this plan outlines in detail the actions immediately to be taken in the event of an incident (including relevant contacts). 0 of this document specifies the order these contacts are to be called.

**Table 4. Contact Details**

Name	Position	Role	Organisation	Contact
<b>Gavin Visser</b>	Site Supervisor	Activating the plan and managing on site response.	WRPL	0401 724 355
<b>Luke Miller</b>	Operations Manager	Provide resources to assist in response implementation.	WRPL	0434 365 031
<b>Ros Dent</b>	Environment Manager	Managing on site response and reporting to the relevant authorities	WRPL	0416 685 615
<b>Emergency Services</b>	-	Emergency Response	NSW Fire and Rescue Police Ambulance	000
<b>Environmental Hotline</b>	-	Environmental reporting	NSW EPA	131 555 or (02) 9995 5555
<b>WorkCover NSW</b>		Incident reporting	WorkCover NSW	13 10 50
<b>Public Health Unit</b>	Public Health Officer	Surveillance and public health response	NSW Health (from Wollongong Hospital)	(02) 4221 6700 (Business hours) (02) 4222 5000 (After hours) ask for Public Health Officer on call

## 7 COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

Communication between WRPL and the community will be through updates on the website located at:

<https://www.bingoindustries.com.au/>

This website will be the primary source of information. Community concerns can also be made in the "contact us" email feedback section. More urgent queries can be made by directly calling 1300 424 646.

When a pollution event occurs, the severity of the event will be established by the Site Supervisor and/or Operations Manager. The following procedures for communications are as follows:

- **severity 3 pollution event** – neighbours, surrounding businesses and staff notified;
- **severity 2 pollution event** – internal staff notified as per protocols set out in Section 0; and
- **severity 1 pollution event** – internal staff notified as per protocols set out in Section 0 and the area cordoned off.

Based on the nature of pollutants at this site, it is unforeseeable that a pollution event on this site could occur that would pose an immediate threat to the surrounding neighbours. In the event that one does occur, the following will be undertaken to inform the identified neighbours:

- NSW Fire and Rescue and or relevant staff will be utilised to doorknock residents of Farmborough Heights;
- in the event that NSW Fire and Rescue cannot inform the local residents, they will be door knocked by a WRPL representative and informed of the incident; and
- in the event a resident is not home, a concise note with detailed information will be left on the door. This will include the nature of the hazard to the resident, any action the neighbour is to take and the contact number to call for regular updates.

Businesses operating in the vicinity of WRPL are set out in **Error! Reference source not found.** and these will be contacted in the event a pollution incident.

**Table 4. Businesses Operating in the Area.**

Business Name	Location	Phone Number
Whytes Gully Waste Depot	Reddalls Road, Kembla Grange	1300 362 360
Kembla Grange Potable Water Treatment Plant (Veolia)	Reddalls Road, Kembla Grange	0428 640 827
Istruc (Car Storage Yard)	17 Reddalls Road, Kembla Grange	0414 706 166

## 8 MINIMISING HARM TO PERSONS ON THE PREMISES

### 8.1 Persons likely to be onsite

Persons likely to be on site are:

- employees;
- contractors and subcontractors;
- customers; and
- general public.

### 8.2 Site Operating Hours

Table 5. Site Operating Hours

Activity	Day	Hours
Deliveries and operation of machinery	Monday to Saturday	7am to 6pm
	Sunday	8am to 4pm
	Public holidays	Nil
All other operational activities	Monday to Saturday	6am to 6pm
	Sunday	8am to 4pm
	Public holidays	Nil

Staff will generally be situated around the site within 30 minutes of the opening and closing times. During this time the weighbridge records all vehicles in and out of the facility with specific areas designated for public disposal of waste.

All contractors and visitors are required to sign-in and out at the weighbridge. As part of signing on to the site, contractors are required to have a safe work method statement (SWMS) and job safety analysis (JSA) for the work they are conducting and this should be sighted if not before getting to the site then by the Site Supervisor and/or Operations Manager when they are inducted to the site.

### 8.3 Measures used to minimise harm to persons on the premises

Minimising harm to persons on the premises is conducted through:

- training;
- personal protective equipment;
- administrative procedures; and
- engineering controls.

#### 8.3.1 Training

Staff training is an important measure used to minimise harm to persons on the premises. Practices and procedures can be reinforced to those working on site and updates communicated.

#### 8.3.2 Personal Protective Equipment

Personal protective equipment has been detailed in Section 5.1 of this plan. Staff are required to have all specified PPE appropriate to the task they are undertaking. Additional PPE can be located in the weighbridge.

#### 8.3.3 Administrative Procedures

Administrative procedures in place to minimise harm to persons onsite are systems that are followed by staff at the Facility. These are located in the site office. Procedures most relevant to this site include:

- inductions for all staff members;

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- risk assessments undertaken for work on site;
- daily reports completed by the Operations Manager;
- measurement and recording of wastes received;
- signage across the site;
- dangerous good register; and
- checking no asbestos waste is entering the site in wastes received.

These procedures are in place to inform staff of the hazards on site and the different mechanisms to control materials entering the site and those operating on the site.

#### 8.3.4 Engineering solutions

Engineered solutions to isolate and control the hazards that are in place on site to mitigate harm to persons on site include:

- drainage lines designed to divert clean water around the site and surface water away from the stockpiles;
- sedimentation ponds to manage surface water sediment loads and retain sediment on site;
- flammable liquids are stored in steel fuel storage tanks with bunding systems;
- Automotive fluids are stored in shipping containers undercover within the workshop area;
- waste oil is stored in disposal sumps which is collected by a contractor; and
- fire extinguishers located in each workplace and near fuel storage areas.

#### 8.3.5 Evacuation Procedure

An evacuation procedure is in place in the event that the Operations Manager needs to muster all staff offsite to control an incident that has the potential to cause harm to human health on site. The Operations Manager is to assess the extent of the incident and initiate the procedure where there is a risk to persons on site.

**NOTE:** 000 is the first contact for an emergency as the primary responders to an incident that poses an immediate threat to human health. Section 9 details the procedure for action during a pollution incident.

#### Duties

The primary role of the duty wardens is to not to combat the emergency but to ensure, as far as practicable, the safety of the occupants and the orderly evacuation from the danger zone.

#### Chief Warden

Assumes control of the occupants of the entire site from the time that an incident occurs until the arrival of relevant emergency services. The Chief Warden on site is to be the Operations Manager or person appointed to this position in their absence.

#### Warden

Appointed to a particular work area to facilitate the evacuation and communicate instructions from the Chief Warden. Wardens are required to know who is working in their area and the safe passage to the emergency muster point. Wardens will be the most senior staff member for a particular work group and will be addressed during the toolbox talk each morning.

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## Evacuation Procedure

When the evacuation procedure has been initiated:

- The Chief Warden (Site Supervisor / Operations Manager) is to communicate increased risk to staff and other workers on site via two way radio.;
- If members of the public, contractors or subcontractors are present, the warden is to communicate to any public that an evacuation procedure has been initiated and they will be escorted off site by a staff member in the area;
- Wardens are to ensure all staff in their area have safely shutdown and isolated their machinery and direct staff to the emergency muster point;
- The wardens are to walk around their work area and ensure everyone has left their area;
- At the assembly point the wardens are to account for all staff members in the area and await instructions from the chief warden; and
- Once emergency response staff have been called, the Chief Warden is to assess the situation and if the risk has been mitigated determine if it is okay to return to work or to direct staff to leave the premises.

### 8.3.6 Muster Points and Alarms

The muster point for this site is located at the top end of the entrance drive way on the northern side. Refer to Emergency Evacuation Plan (Figure 2). In the event that this site is unsafe, the Chief Warden will announce a new muster point based on site conditions.

### 8.3.7 Contact details for available consultants

In the event that a consultant is required at short notice for a pollution incident the following contacts (Table 6) are available. If a hazardous waste contractor is required one will be appointed for disposal and spill containment services operate 24 hours.

These numbers do not replace the need to report to the appropriate regulatory authority or call emergency services if there is immediate threat to persons and the environment.

**Table 6. Contact Details for Suitable Consultants**

Consultant	Role	Contact Number
<b>Jackson Environment and Planning – Mark Jackson</b>	Planning and Environment Consulting	0411 060 478
<b>Public Health Unit</b>	Surveillance and public health response. Medical and toxicological advice.	4221 6700 (Business hours) 4222 5000 (After hours) ask for Public Health Officer on call

## 9 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

The nature of the pollutants has been detailed and the risk of a major pollution hazard is quite low. In the event of an incident that cannot be managed on site, the following should be contacted in the designated order. Contacts are required to be called if the pollution incident poses an appropriate level of risk.

**Table 7. Contacts and Responsibilities in the Event of a Pollution Incident**

Name/ Organisation	Role	Person responsible to call	24 Hr Contact
<b>Emergency Services: Fire and Rescue NSW, Ambulance, Police</b>	First responders. They are responsible for controlling and containing incidents. Can be used to contact surrounding neighbours	Site Supervisor / Operations Manager / Environment Manager	000 or 112 for mobile phones
<b>Environment Protection Authority</b>	Regulatory authority under the POEO Act for this licensed site	Site Supervisor and/or Environment Manager to call as soon as possible and record the Incident Number.	131 555 Select 1 or (02) 9995 5555
<b>Ministry of Health via Public Health Unit</b>	In the event this could cause impact to the community and workers the Public health unit provides advice on the response	Site Supervisor and/or Environment Manager	(02) 4221 6700 (Business hours) (02) 4222 5000 (After hours) ask for Public Health Officer on call
<b>WorkCover NSW</b>	To be contacted if this is a notifiable incident	Site Supervisor and/or Operations Manager	13 10 50
<b>Wollongong City Council</b>	Regulatory authority	Site Supervisor and/or Environment Manager	(02) 4227 7111

The pollution events that are most likely to occur are those associated with spills on site and extraordinary weather events that could cause overflow into surrounding areas. These should be contained immediately by staff and evaluated by the Operations Manager and/or Environment to determine the level of action necessary.

Another pollution event that may occur is a fire that may produce offensive or hazardous fumes. A regular fire is controlled by staff workers using a water truck stored on site until emergency services arrive. Where smoke or fumes are of unknown nature, the fire is to be controlled by NSW Fire and Rescue.

## 9.1 Early warnings

In the event of a pollution incident those at the scene are to immediately contact the Site Supervisor and/or Operations Manager by mobile phone or CB radio.

The Site Supervisor and/or Operations Manager is to assess the situation and inform the staff at the weighbridge of instructions for staff and public.

The primary means of warning will be mobile telephone. Where evacuation procedures need to be initialised, the siren is to be switched on.

The weighbridge is the direct point of contact with the public and will be briefed in the status of the situation and the response to public and other staff members.

Where a pollution event has the potential to have impact offsite, communication with surrounding neighbours will be undertaken. Section 0 details the procedure for interacting with surrounding community.

## 9.2 Updates

Updates to staff and the surrounding community will be required for all pollution incidents.

In the event that a pollution incident occurs on site requires immediate attention in the form of clean up and containment and or evacuation, the early response by the Site Supervisor / Manager is to assess the risk associated with the incident and initiate the incident response. When the initial pollution has been stabilised by reducing the immediate threat to human health and the environment updates are required to be made until the pollution incident has been rectified. Onsite updates will be made by the Site Supervisor / Manager and will include:

- briefing the weighbridge operator on the status of the incident and instructing them on the response to calls and queries from the public;
- signage upon entry to the site to the status of the site (closed or open);
- regular phone updates to the Operations and/or Environment Manager; and
- regular updates by phone to onsite contractors.

The information that is required to be conveyed in these updates will include:

- the status of the area or site. Is it open or restricted;
- the area where the incident has occurred;
- the hazard that is present;
- what is being done to amend this incident;
- when the next update occurs; and
- any additional safety requirements required by staff working near or around the area.

## 9.3 Actions during and after incident a pollution incident

The following information details the action to be taken during and after a pollution incident. Following this, additional information has been included based on site specific hazards. A flowchart, summarising the pollution incident processes detailed below, to be followed during a pollution incident has been included in the executive summary of this document.

In the event of a pollution incident:

- the primary person at the pollution incident, where safe to do so, will initiate a response to ensure any immediate threat to human health and environment is reduced. This will include, and not be limited to, removing surrounding people from the danger area:
  - the primary person is to ensure all members of the public in the immediate area removed from any potential danger and asked to proceed to the weighbridge;

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- the primary person will contact the Site Supervisor to initiate the response. The Site Supervisor is responsible for managing the response on site:
  - the Site Supervisor is responsible for documenting the incident. A hazard and incident reporting form are required to be complete for each incident; and
  - the nature of the incident should be established to whether it is a chemical spill, fire or other;
- the Site Supervisor will call the emergency response authorities (Fire and Rescue, Ambulance, Police) if required;
- the primary person at the site of the incident, where safe to do so, will initiate spill containment measures appropriate to the pollutant at the instruction of the Site Supervisor. Information on the chemical/pollutant will be found the SDS located at the site office and the risk assessment for the appropriate task:
  - in the event that it is unsafe to do so, the staff member will be directed to move a safe distance away from the area and prevent others from entering the area until the Site Supervisor directs otherwise;
- if the severity score is 1, it is a localised low risk incident. The Site Supervisor is to assign appropriately trained staff or contractors to combat the incident. The area is to be cordoned off with hi-visibility markers and signage:
  - the Site Supervisor is to brief the weighbridge operator to inform the public not to enter the area and provide information to staff if required;
- if the severity score is 2, the incident requires site evacuation. The Site Supervisor is to alert all persons by two way radio and announce that an evacuation procedure is in place and to assemble at the emergency assembly point:
  - Wardens of the different work areas are to follow the evacuation procedure directing public and staff to the muster point;
  - the Chief Warden will ensure no one is left on site and will provide directions as informed by the emergency response crews;
  - the site is to be closed and signage used to restrict public entry to the area; and
  - where safe to do so, a weighbridge operator will be directed to return to the weighbridge by the Site Supervisor to restrict the entry to site and provide information to any queries from neighbours.
- where the severity score is 3, the incident requires site evacuation and surrounding community consultation:
  - the Site Supervisor is to initiate the evacuation procedure on site;
  - Wardens of the different work areas are to follow the evacuation procedure directing public and staff to the muster point;
  - once at the muster point, on directions from the Site Supervisor, a staff member will be directed to door knock the appropriate all residences with the potential to be exposed to the pollution incident; and
  - where safe to do so, a weighbridge operator will be directed to return to the weighbridge by the Site Supervisor to restrict the entry to site and provide information to any queries from neighbours.
- once emergency services have the incident under control. Access to site will be at the direction of the Site Supervisor.

### 9.3.1 Chemical Spills

There is the potential for a chemical spill to occur on this site in the form of leaking or ruptured hydraulic lines on machinery, re-fuelling spills and other chemicals that are used onsite.

The following points should be undertaken in conjunction with the actions to be taken any pollution event listed above. These points should only be conducted if the area is safe to do so:

- identify the type of incident and chemical involved. The chemical should be detailed on the dangerous goods register onsite;
- determine if the spill can be safely contained by staff on site and that it will not enter any drains;
- where no immediate safety hazard exists read the SDS for the spill clean-up information;
- machinery on site will be utilised to clean up spills and sand will be used from the site to prevent liquid migration into drainage lines;
- if the spill occurs on an unsealed surface, initial response will be to stop the leak. The SDS should be read for safe handling of the chemical and no open sources of ignition should be in the area:
  - an excavator or bulldozer will be used to move the contaminated soil into a bunded stockpile and where practical move to a sealed surface. If a sealed surface is not possible, medium density polyethylene (MDPE) sheets will be laid out on the ground and the soil stockpiled on this. All stockpiles will be covered with MDPE; and
  - the soil will need to be tested to determine if the material is suitable for disposal on site or offsite; and
- a 24hr hazardous waste contractor may be called to dispose of the chemical waste.

### 9.3.2 Fires

Fires can occur due to high ambient air temperatures and combustible materials on site. EPL conditions specify that the licensee must take all necessary steps to extinguish all fires burning as soon as possible and contain fire water. A fire is considered an incident and will need to be reported to the EPA as specified in the site management plan.

In the event a fire, the safety of persons in the area is of primary importance and should be assessed prior to combating an incident. Emergency services should be contacted where there is any risk to the health and safety of workers. Evacuation and incident procedures detailed in Section 9.3.

The following points should be noted for a fire incident:

- the Site Supervisor will immediately contact emergency services and the local fire brigade;
- a fire should always be approached from the upwind side to prevent exposure smoke and potentially hazardous fumes;
- determine the source of fire. Check the area for surrounding hazards such as fuel or other flammable liquids. Where safe to do so, remove these away from the area;
- in the case of a fire, a truck mounted water tanker can be utilised for firefighting;
- all plant on site must have an appropriate fire extinguisher. Extinguishers are also located at the weighbridge; and
- the fire needs to be documented for incident reporting. This should include;
  - time, date and location of any fire ignited or reported at the site;
  - prevailing weather conditions and observations regarding smoke directions and dispersion; and
  - time and date the fire was extinguished

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## 9.4 Spill containment equipment

Plant equipment is made available to manage and contain the foreseeable pollution spills on site. In the event of a spill, onsite plant equipment will be used to move soil to bund and prevent the pollutant moving into the drains or waterways.

The sedimentation ponds will be the collecting point for any surface drainage that occurs. If required these can be pumped out if they are grossly impacted in a pollution event.

A spill kit is placed at the Workshop to manage small chemical spills that may occur around the site.

## 9.5 Shutdown of processes/equipment

Plant and machinery is operated by suitably trained personnel. In the event that staff need to leave their equipment as a result of a pollution incident the following measures will need to be undertaken to ensure the machinery is shut down and left correctly:

- move the machinery to a suitable onsite position where there is no risk to the operator, other persons or the machine itself. Following directions of the Site Supervisor;
- follow shut down procedures appropriate for the equipment; and
- if the machinery is going to elevate or increase the risk associated with the incident. The Site Supervisor is to be contacted and an alternative area nominated for shut down.

## 9.6 Clean-up procedures

When a pollution incident has been stabilised and any immediate threat to human health and the environment has been mitigated clean-up will be required of the material. The SDS for each chemical provides clean-up instructions for stored chemicals on site.

If the material is not permissible to be disposed of on site, it is to be disposed of by an appropriate contractor licensed to handle the material.

Appropriate waste handling contractors can be engaged to collect and remove solid waste and also pump out liquid waste that may have collected in the sedimentation ponds as a result of pollution to the drainage system.

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## 10 STAFF TRAINING

The objectives of the training that is to accompany this plan is to ensure all staff members on site are aware of the hazards in the workplace and the contents of the PIRMP such that they know of their responsibilities in the event of a pollution incident.

There are several elements to training at WRPL. These are outlined in the site management plan and include:

- position competency requirements;
- general induction training;
- toolbox meetings; and
- ongoing training.

### 10.1 Inductions

The induction training incorporates the environmental and WHS requirements for the relevant position. Contractors, customers and visitors are all required to undertake a general site induction.

The general site induction is delivered by the Weighbridge personnel. Induction training specific to the individual role of the staff member is delivered by the Compliance Team and for site specific requirements also by the Site Supervisor and requires the person to undertake a detailed review and note acceptance of these documented procedures. The specific induction includes but is not limited to:

- safety and operating procedures and the correct identification of hazardous waste;
- operation of plant and processing equipment;
- identification of wastes;
- accurate data recording; and
- pollution incident response management plan including emergency and evacuation procedures.

### 10.2 Ongoing training

A review of ongoing training requirements should be conducted on an annual basis and established based on but not limited to:

- changes in procedures;
- changes in regulations;
- changes in equipment;
- errors or deficiencies in job performance; and
- errors in data reporting.

Hazard identification and safe work method statements are required when any new task is to be undertaken on site. This is to be reviewed by staff undertaking that task and will be need to be included in the training register.

Types of ongoing training that may be required for a specific duty may include:

- First aid training;
- Chemical and asbestos handling training;
- Training in use of fire extinguishers/ fire management;
- High risk work training; and
- Workplace health and safety training.

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## 10.3 Other Training

### 10.3.1 Daily toolbox talks

A toolbox talk is a brief discussion to be undertaken daily by the Operations Manager. This is to be undertaken each morning prior to the start of work. The objectives of the toolbox talk are to conduct a regular safety discussion relevant to the specific work being undertaken that day. This will include:

- description of works to be conducted that day;
- health and safety issues;
- environmental issues; and
- procedural / general issues.

### 10.3.2 Simulated exercises

A simulated test of this PIRMP is to be undertaken annually. The objective of this exercise is to test the effectiveness of the plan and provide an interactive training exercise for staff.

The planning of this exercise is to be undertaken by the Compliance team in conjunction with the Site Supervisor.

The goal of this exercise is to provide a situation that is reflective of an incident that may be encountered on site. Safety is paramount for this exercise and no actual hazard should be conducted (such as the lighting of a fire) these will include:

- Spill; or
- Fire.

Requirements of the exercise include:

- inform those on site that a simulation will be taking place that day;
- inform the public that a simulation will be taking place at the weighbridge and on the website. Specify the time and the date;
- at the toolbox talk on the morning of the simulation, the works coordinator will refresh the staff on the PIRMP and inform them that the simulation will occur that day;
- designate a location on site for the incident to occur;
- define the incident. This will include a pollutant common to site, volume or size of the pollutant, the people involved;
- activate the evacuation procedure and muster all staff to the assembly point; and
- allocate a staff member for auditing/supervising this simulation (this should be a staff member who is not responsible for the activation of the plan).

The outcome of this exercise is to:

- instruct staff on how to implement this plan;
- contain and manage an incident relative to the site;
- initiate an evacuation;
- document an incident;
- ensure all reporting paperwork is filled and the relevant authorities contacted (only call internal staff and indicate this is part of a simulation. Do not call external authorities); and
- provide feedback to all staff. Where there are non-compliances with the plan, this can be used to refine the PIRMP and provide further training if required.

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### 10.3.3 Frequency of training

The following table indicates the frequency of each type of training on site.

**Table 8. Frequency of Training and Location of the Records**

Training type	Frequency	Reporting Requirement	How records are kept
<b>General Induction</b>	Commencement of employment	Signed on to the induction record	Compliance and HR Team – Head Office
<b>Toolbox talks</b>	Daily	Daily toolbox form completed	Compliance and HR Team – Head Office
<b>Other job specific training</b>	<ul style="list-style-type: none"> <li>• On a needs basis or when:</li> <li>• There is a change in procedure</li> <li>• Change in regulations</li> <li>• New equipment</li> <li>• Deficiencies in job performance</li> <li>• Errors in data reporting</li> </ul>	Complete the training record form	Compliance and HR Team – Head Office
<b>Simulation exercises</b>	yearly	Complete the exercise simulation form	Compliance and HR Team – Head Office
<b>Fire/evacuation Drill</b>	yearly	Record this with the WHS training records	Compliance and HR Team – Head Office

# 11 TESTING OF THE PLAN

## 11.1 Manner in which the plan is to be tested and maintained

The testing of the plan relies on annual review of the document accounting for results of simulated testing, incidents reported in the previous year and any changes in procedures and processes that have occurred.

The simulation and evacuation drill test the practical effectiveness of the plan and identifies areas of improvement. Reported incidents will be used to highlight areas of risk that may need to be considered in the plan. Annual reviews will be used to implement any changes that have occurred in the process of running the site or regulations of operating under this licence.

Incident reporting and incident simulation is required to be documented. A requirement for these documents will include the date and all those who carried out the test.

## 11.2 Review of the Plan

The objective of this PIRMP is to provide a description of the hazards and operations associated with the EPL and the procedures and actions in place to mitigate any pollution event that may arise for them. Consequently, this PIRMP is a working document that is designed to ensure any changes that could affect a pollution incident are captured.

Table 9 is an example register of review for the identification of the current version of the PIRMP. This will include the document name, the person responsible for the review, the date of change and the changes that were made.

The requirements for the document review are:

- the review is to be conducted annually from the date of the first version of the document;
- the document is to be reviewed if there is any significant change in process or operation on the site;
- the document is to be reviewed where there is a change in the legislation or the requirements of the Environmental Protection Licence;
- the document is to be reviewed where the testing of the plan identifies a failure or inefficiency; and
- a review is required to be completed within 30 days of a pollution incident.

## 12 REFERENCES

*Protection of the Environment Operations Act 1997*

*Protection of the Environment Operations (General) Regulation 2009*

Environmental Guidelines: Preparation of Pollution Incident Response Management Plans, 2012

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Figure 2 Evacuation map and muster point





