

PIRMP - Spring Farm Resource Recovery Park

Pollution Incident Response Management Plan

This document is to be viewed in conjunction with Emergency Response Plan (PLAN003). Document #:

PLANS003.2.13.1

Address: 20 Barrow Road, Spring Farm NSW 2570

EPA Licence: # 5105, 20021, 12588

Facilities on site:

- Spring Farm Materials Recycling Facility
- Spring Farm Transfer Station
- Spring Farm Product Destruction
- Spring Farm Glass Recycling
- Spring Farm Liquid Treatment
- Spring Farm Small Vehicle Drop Off
- Richardson Road Landfill (Closed)

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Purpose and definitions

The purpose of this plan is to provide effective procedures for dealing with a pollution incident at Veolia sites located within NSW which hold NSW Environmental Protection Authority (EPA) licenses for one or more facilities/operations on site. The information and procedures contained within this document are in accordance with requirements as set out within the *Protection of the Environment Legislation Amendment Act 2011 No 63*.

This Plan is provided as part of each VEOLIA site *Emergency Response Plan (ERP)* in accordance with the procedures set out in the *Emergency Management Procedure*

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

Notification of pollution incidents:

A pollution incident on a VEOLIA site must be notified according to the notification procedure on page 13 of this document in the event that the incident:

- Causes harm to the health or safety of human beings or the environment, which is not trivial, and/or
- Which results in monetary loss or damage costing an amount exceeding \$10,000 (cost to include clean-up/further pollution mitigation measures)

Not Trivial means:

- Harm to human health (Injury/Illness) as a result of a pollution incident which is of major severity or above (as defined in the *Incident Reporting and Corrective Action Procedure*)
 - Harm may in some instances not result in an injury classified as major but may still be considered notifiable. This decision is to be made by the Site Manager or most senior worker on site at the time of the incident
- Harm to the environment which is of major severity or above (as defined in the *Incident Reporting and Corrective Action Procedure*)

Site Information

Site Name: Spring Farm Resource Recovery Park

Site Address: 20 Barrow Road, Spring Farm, NSW 2570

EPA license #'s relevant to this site:

- 5105 (Surrendered 23 Oct 2020)
- 20021
- 12588

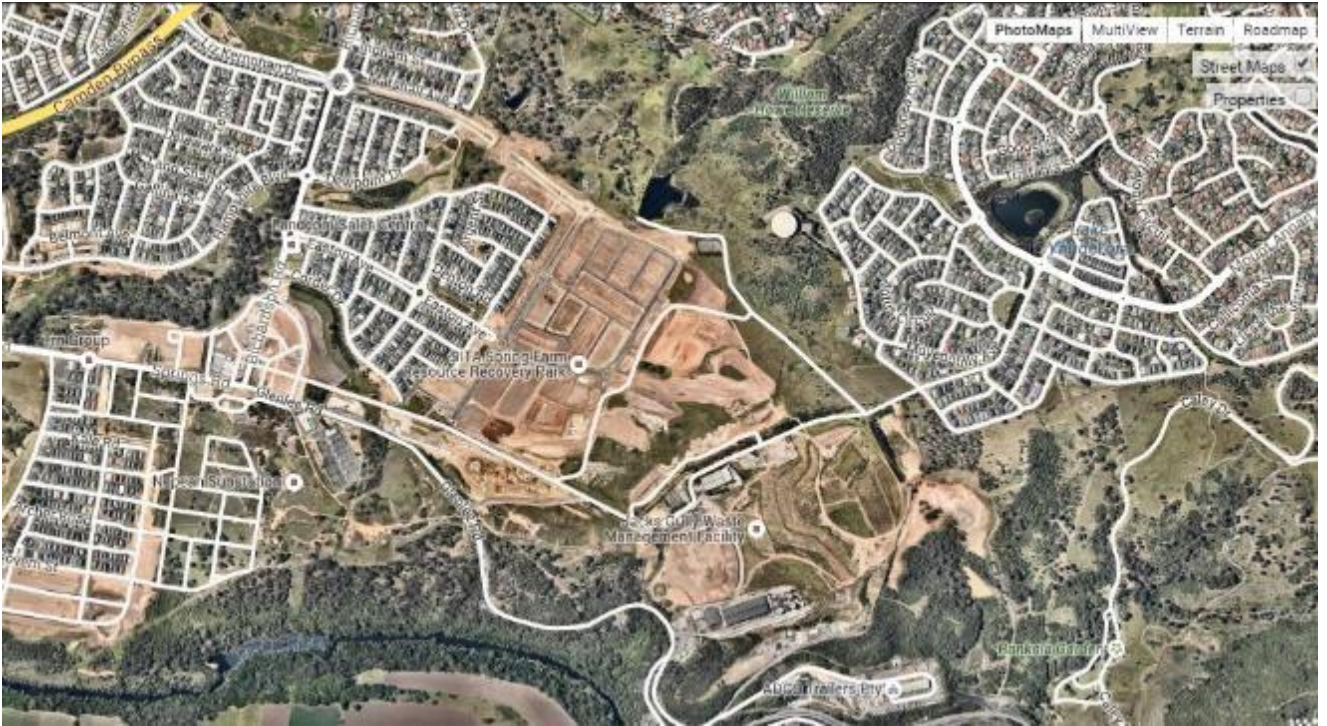
Contact Details or Persons on site in the event of a Pollution Incident

| Responsibility | Name | Position Title | 24 Hour Contact Number |
|---------------------------|---------------|-------------------------------------|------------------------|
| Activating the plan | John Mak | Site Manager – MRF/ ARRT / Landfill | 0427 527 185 |
| | Kelly Gee | Environmental Manager | 0429 808 696 |
| Managing the Response | John Mak | Site Manager – MRF/ ARRT | 0427 527 185 |
| | Patrick Abbey | Site Supervisor – MRF | 0439 371 476 |
| | Linda Douglas | Site Supervisor – ARRT | 0413 295519 |
| Notifying the Authorities | John Mak | Site Manager – MRF/ ARRT / Landfill | 0427 527 185 |
| | Kelly Gee | Environmental Manager | 0429 808 696 |

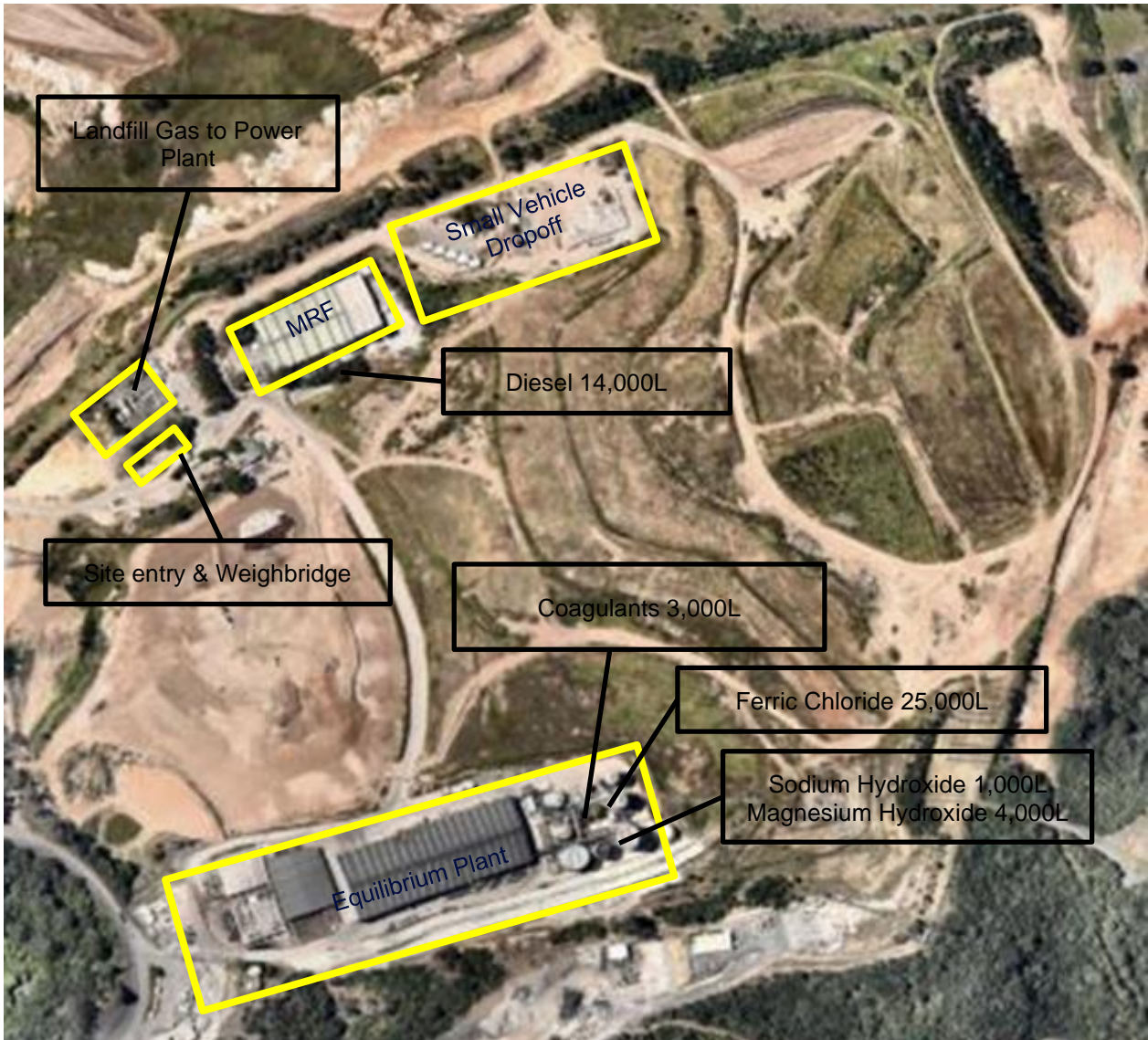
Site locality

Spring Farm Resource Recovery Park covers an approximate area of 36 hectares. The following map shows the approximate area covered by the Spring Farm Resource Recovery Park.

Site access is via Liz Kernohan Drive & Barrow Road, SPRING FARM.



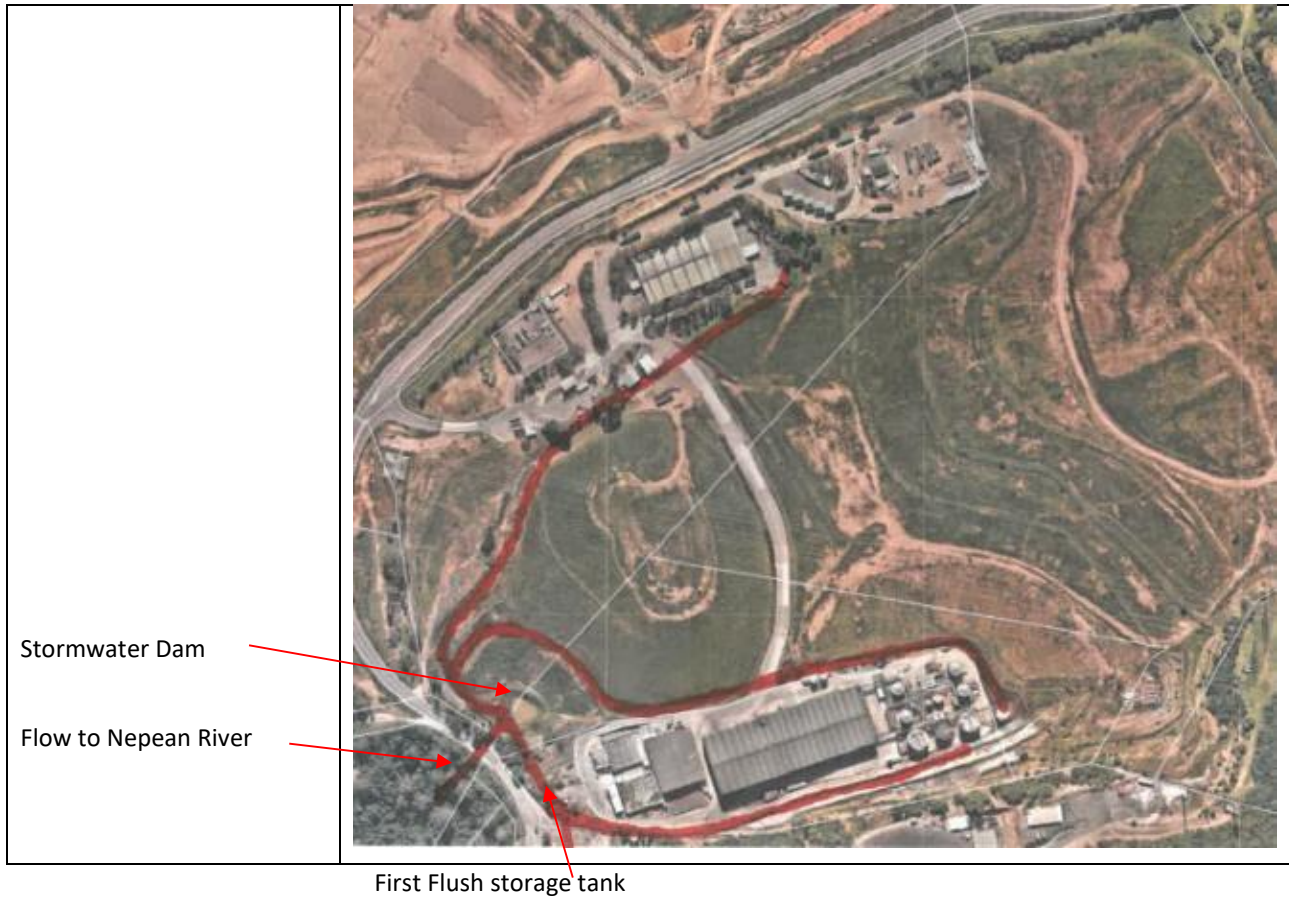
The following map shows the approximate locality of licensed facilities and major chemical quantities of Spring Farm Resource Recovery Park.



The following map shows the surrounding area likely to be affected by a pollution incident



Outline of Stormwater Drainage



Notification Procedure for Pollution Incidents

When a pollution incident occurs on site

1. Immediately engage in harm minimisation measures / spill containment as per procedures documented in the site ERP
2. If the incident presents an immediate threat to human health or property contact emergency services on **000** immediately
3. Assess the level of actual or potential pollution and decide whether the incident is a '**notifiable**' incident according to the definition provided on Page 3 of this document.
4. If the incident is considered '**notifiable**' the following agencies must be notified immediately in listed order:
 - a) For pollution incidents within normal working hours the worker nominated as 'Notifying the Authorities' as per the table on Page 4 of this document (or the most senior worker on site at the time of the incident) must make all notifications
 - b) For pollution incidents which occur outside of normal working hours the most senior worker on site at the time of the incident must make all notifications

| | | | |
|----------------------------------------------|--------------------------------------------------------------------------------|----------|----------------|
| Environmental Regulatory Authority: | NSW EPA | Contact: | 131 555 |
| Work Health and Safety Regulatory Authority: | Safe Work NSW | Contact: | 131 050 |
| Consent Authority | Department of Planning, Industry & Environment | Contact | 1300 305 695 |
| Local Council: | Camden Council | Contact: | (02) 4654 7777 |
| Fire and Rescue: | NSW Fire and Rescue | Contact: | 1300 729 579 |
| Ministry of Public Health Unit: | Liverpool Public Health Unit (South West Sydney) | | |
| Business Hours: | (02) 9794 0855 | | |
| After Hours (Royal Prince Alfred Hospital): | (02) 8738 3000 (Liverpool Hospital) - ask for Public Health Officer on call | | |

Hazards and Controls

The types of hazards which may occur on site include:

- Land or water contamination from Leachate
- Land or water contamination from hazardous chemicals stored on site
- Land contamination from sub-surface gas migration to neighbouring community
- Air contamination from waste material odours
- Air contamination from smoke or fumes in the event of a fire
- Air contamination from uncontrolled release of gas

Site specific hazards to human health or the environment identified on the site including the likelihood of their occurrence and the actions taken to eliminate or reduce those hazards are recorded on the site *Risk Register*. The site *Risk Register* contains information relating to the area or process to which the risk applies and the risk scenario. A risk rating/likelihood of the hazard occurring is available for all scenarios and the controls in place to minimise the likelihood of an incident occurring

Pollution Incidents Likelihood

The following list of events may increase the likelihood of a pollution incident occurring on site:

- Natural disaster – Earthquake/Storm/Flood/windstorm
- Chemical Spill
- Chemical/diesel storage tank failure
- Bunding structural failure
- Leachate structural failure
- Liquid tanker failure (Leachate)

- Liquid Tanker Failure (Diesel)
- Fire within waste
- Failure of septic system
- Spontaneous combustion – landfill gas / refining product
- Procedure failure
- Gas power plant explosion
- Fixed Plant Failure

Pre-emptive Actions

Pre-emptive actions are actions taken to minimise or prevent any risk of harm to human health or the environment. The following are the pre-emptive actions taken on site:

- Site inductions
- Site Environmental Management Plan
- Site Environmental Monitoring Program
- Provision of training and competency assessment for VEOLIA Safe Operating Procedures
- Provision and use of spill containment kits
- Bunding as per requirements of the *Bund Construction and Maintenance SOP* for all chemical storage areas
- Management of landfill gas in accordance with *Landfill Gas Management SOP*
- Keystone shut off valve at stormwater dam
- Where applicable all processes on site are undertaken in accordance with the relevant Australian Standard/s

Inventory of potential Pollutants on Site

Potential Pollutants on site can come in many forms. Chemical pollutants are a considerable risk dependent on the quantity held on site and the storage method used. Hazardous chemicals stored, used or handled on site are recorded on the site Chemical Register. Chemical Registers are kept on site in accordance with the *Hazardous Chemicals (incl. Dangerous Goods) SOP*.

The following table includes all non-chemical potential pollutants identified for the site including the maximum quantity held on site and the storage method.

| Potential Pollutant | Maximum quantity held on site | Storage type/Method of storage | Hazards | Risk Rating using VEOLIA Risk Matrix |
|-------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------|
| Sodium Hydroxide | 1,000L | Plastic tank inside concrete bund – ARRT Tank Farm | Burning if in contact with skin | 11 |
| Diesel | 2,500L | Mobile sled tank | Combustible liquid will ignite if near sparks. | 11 |
| | 14,000L | Stored on bund in area that drains to collection sump - MRF | | |
| Ferric Chloride | 25,000L | Plastic tank inside concrete bund – ARRT Tank Farm | Corrosive liquid DG UN 2582 | 12 |
| Coagulant Flocculent Copolymer | 3,000L 1,000L | Located undercover in IBC containers at Tank Farm Located undercover in IBC containers at Tank Farm | Non DG, minor hazard, refer SS and use PPE | 5 |
| Landfill Leachate | 2 ML (Approx) | Stored in base of cell and liquid treatment plant storage tanks | Possible pathogens | 9 |
| Magnesium Hydroxide | 4,000L | Plastic tank inside concrete bund – ARRT Tank Farm | Non DG, minor hazard, refer SS and use PPE | 9 |
| Licensed waste streams identified on EPL's 20021, 12588, | Limits as per EPL | Within reception area for identified waste stream | General Solid waste, possible sharps. | 9 |

Note: For further storage location information refer to the site plans (PLANS001).

Safety Equipment on site

Safety equipment is any equipment located on site which can be used to minimise the risks of a pollution incident occurring or can be used to assist in containing / controlling a pollution incident.

Available on site as listed below:

| Type of Safety Equipment | Description – what used for | Storage Location on site |
|--------------------------|------------------------------------------|-------------------------------------------------------------------|
| Asbestos Kit | For safe asbestos storage | ARRT office |
| | For safe asbestos storage | MRF office |
| Spill Kits | For clean up of liquid spills | Inside and outside ARRF, Glass, PDU, Tank Farm buildings |
| | For clean up of liquid spills | At SVDO |
| | For clean up of liquid spills | Inside and outside MRF building |
| Collection sumps | For temporary catchment of liquid spills | Tank Farm Area - ARRT |
| | For temporary catchment of liquid spills | Inside MRF building and outside at workshop area |
| Bunds (moveable) | For storage of liquids | Receival Hall, Glass & PDU Area, Tank Farm Area ARRT |
| | For storage of liquids | SVDO |
| | For storage of liquids | Inside MRF building and outside at workshop area and P&E Workshop |
| Bunds (fixed) | For storage of liquids | Tank Farm Area ARRT |
| | For storage of liquids | Landfill stormwater dam with keystone shut off valve |

The site's risk register contains a hierarchy of control pertaining to safety risks on site. The risk register is reviewed periodically, kept on site in both a soft and hard copy, and available to staff.

Note: the Safety Data Sheet for all chemicals on site are kept alongside the chemical risk register in accordance with the *Hazardous Chemicals (incl. Dangerous Goods) SOP*

Harm Minimisations Measures on Site

Harm minimisation measures on site are actions or measures which are taken to minimise the harm to humans or the environment in the event of a pollution incident on site. The following is a list of the harm minimisation measures on site:

- Emergency Response Plans – including evacuation diagrams and emergency evacuation point locations.

- Emergency Response plan training and exercises as per the requirements of the *Emergency Management Procedure*
- Trained and accredited First Aiders and Wardens
- Provision of fire-protection systems including firefighting equipment
- Availability of VEOLIA personnel with environmental management knowledge for the purposes of assessing environment impact in the event of a pollution incident.
- Local medical facility contacts
- Site warning alarm system
- Safety Data Sheet Register
- Two way radios

Actions to be taken in the event of an emergency

Immediate actions are those actions which minimise or prevent harm to human health or the environment as a result of a pollution incident. The actions to be taken in the event of a pollution incident are as per the Response Procedures detailed in the site ERP relevant to the type of pollution incident which has occurred.

Actions for responding to Pollution caused by an incident

Following the initial response to a pollution incident occurring on site (as outlined in the site ERP), actions will be taken to combat any harm caused to the environment as a result of the incident. All Action taken will be in collaboration with the relevant authorities and where applicable VEOLIA will engage qualified and experienced persons to assist in any required clean-up and mitigation activities.

It is the responsibility of the Site Manager in consultation with the site Environmental Personnel and the state SHQ team to ensure accurate and timely communication between all parties involved, including but not limited to:

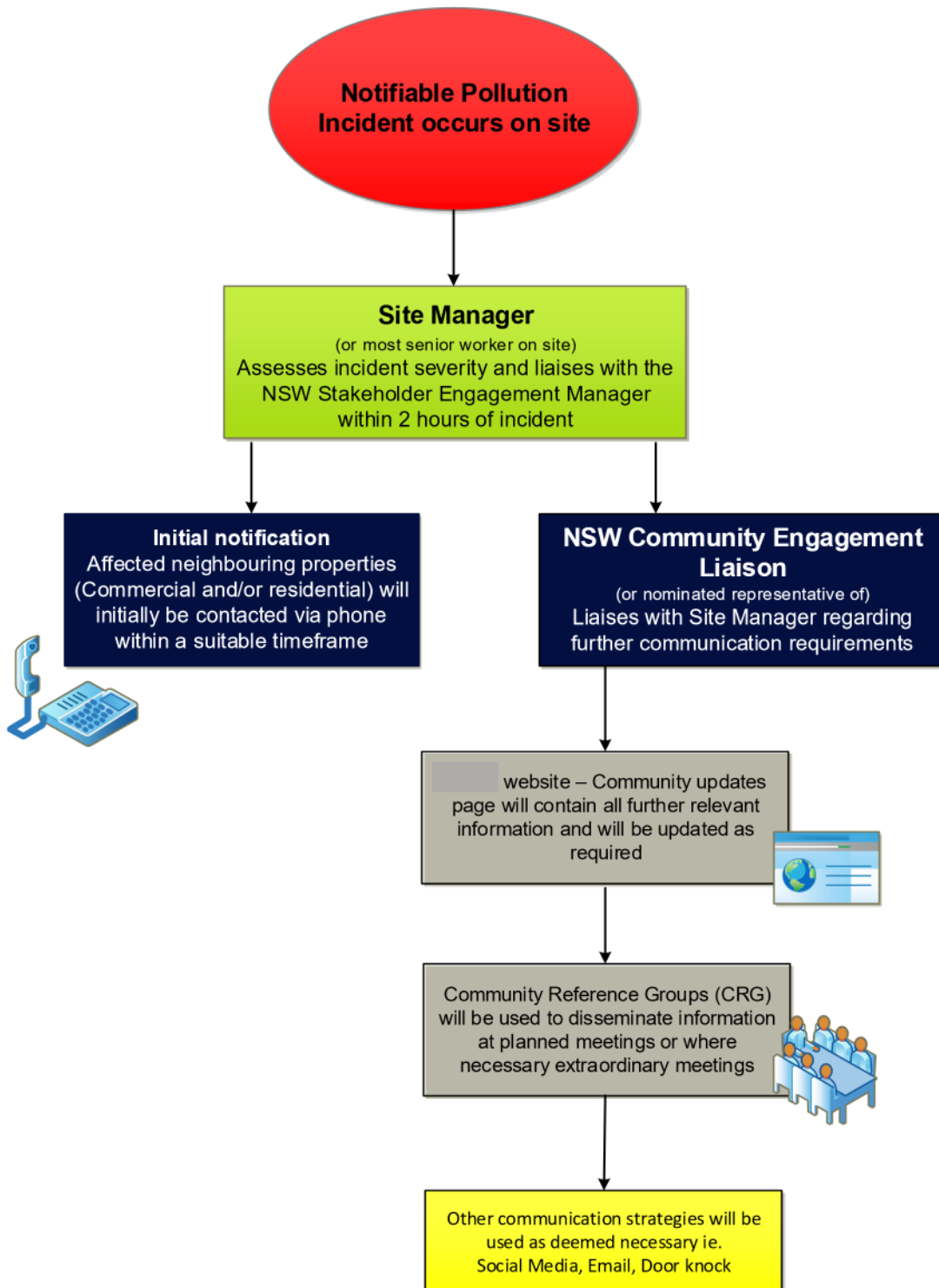
- Relevant authorities,
- Neighbouring properties,
- Any other persons affected by the incident and
- VEOLIA management

All pollution incidents must be investigated, and corrective actions completed with the aim to prevent further incidents from occurring in the future in line with the *Incident Reporting and Corrective Action Procedure*.

Communicating with Neighbours

The following flowchart illustrates the actions to be taken in the event of a 'notifiable' pollution incident occurring on a VEOLIA site:

Communicating with Neighbours – Actions to be taken:



Communicating with Neighbours – Actions to be taken:

1. Site Manager upon becoming aware of a notifiable pollution incident assesses the severity of the incident with regard to impact on neighbouring properties
 - a. Consider the following
 - i. Does the pollution incident have the potential to affect one or more neighbouring properties?
 - ii. How will it affect them (including long and short-term effects)?
 - iii. What actions need to be taken by the neighbouring properties to protect them from harm?
 - b. Site Manager contacts the NSW Community Engagement Liaison within two hours of the incident occurring and informs of the incident & possible impact on neighbouring properties
2. Site Manager contacts the neighbouring properties deemed necessary and provides them with the following information relevant to the pollution incident:
 - a. What has happened?
 - b. The Health and Safety implications for them
 - c. Corrective Actions which have been activated to minimise the harm/prevent further harm
 - d. What to expect?
 - e. Information on the VEOLIA website 'community updates' page for future updates
 - f. His/Her contact details for further queries/concerns
3. NSW Community Engagement Liaison liaises with Site Manager and provides updates through the following communication channels as required:
 - a. VEOLIA website on the 'Community updates' page. (Updates controlled by the NSW Community Engagement Liaison).
 - b. As needed, other communication strategies will be employed to inform neighbouring properties and the wider community of important information related to VEOLIA owned and/or operated sites

The Site Manager must ensure a current listing of neighbouring property addresses and contact numbers are available at all times.

Staff Training

The relevant VEOLIA workers for the site as recorded in the site ERP must be trained in accordance with the training requirements outlined in the site ERP. The objective of staff training is to ensure an understanding of the requirements for notification in the event of a pollution incident occurring on a VEOLIA site, and the actions to take in the event of an emergency

Records of training must be kept as per the *Induction, Training and Competency Procedure*.

Emergency Exercises

Emergency exercises will be performed in accordance with the requirements of the site ERP (minimum one pollution incident emergency drill performed every 12 months).

On completion of the exercise the PIRMP will be reviewed and updated accordingly.

Review of the Plan

The plan will be reviewed annually in accordance with the requirements as stated in the site ERP. Incidents and exercises occurring on site will be reviewed by the Site Manager in accordance with the requirements of the *Emergency Management Procedure*.

Site Maps

Site Maps are as provided in the site ERP or as below.

Definitions

Emergency - Any event which arises internally, or from external sources, and which may adversely affect persons or the community generally, and requires an immediate response.

Emergency Response Plan (ERP) - The written documentation of the emergency arrangements for a facility, generally made during the planning process. It consists of the preparedness, prevention and response activities and includes the agreed emergency roles, responsibilities, strategies, systems and arrangements.

EPA - means the Environment Protection Authority constituted by the *Protection of the Environment Administration Act 1991*.

Evacuation - The orderly movement of people from a place of danger.

Harm – (to the environment) includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

Pollution means -

- a) Water pollution, or
- b) Air pollution, or
- c) Noise pollution, or
- d) Land pollution.

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.

Related documents

| DOCUMENT NAME | REFERENCE NUMBER |
|---------------------------------------------------------------------|------------------|
| Bund Construction and Maintenance | SOP078 |
| Emergency Management Procedure | PROC005 |
| Emergency Response Review | FORM030 (1) |
| Hazardous Chemicals (incl. Dangerous Goods) | SOP017 |
| Incident Reporting and Corrective Action Procedure | PROC008 |
| Protection of the Environment Legislation Amendment Act 2011 No 63. | |
| Site Plans | PLANS001 |

Review and Document Control

| VERSION | CHANGE | REVIEWED | AUTHORISED | DATE ISSUED |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|--------------|
| 1 | Initial Issue | Team Leader Safety Systems | GM EQS | Aug 2012 |
| 2 | New section added for 'Responding to Pollution caused by an incident' NSW Fire and Rescue contact number updated Update to terminology (Emergency Exercises) | Team Leader Safety Systems | Team Leader Safety Systems | 17/05/13 |
| 3 | Update to terminology | Safety Coordinator | Team Leader Safety Systems | 10/10/13 |
| 4 | Updated contact details for personnel in the event of an incident | Safety Coordinator | Team Leader Safety Systems | March 2015 |
| 5 | Updated site contact details | Safety Coordinator | EQS Adviser | October 2015 |
| 6 | Template/Rebrand (SITA to VEOLIA) Update Updated to include requirements of Department of Planning | EQS Advisor | Safety Systems Manager | 02/01/16 |
| 7 | 'Stakeholder engagement Liaison', changed to 'Community engagement Liaison'. | Safety Systems Manager | GM EQS | 01/03/16 |
| 8 | Update site contact details | Safety Coordinator | Int Sys Mgr | 27/04/16 |
| 9 | Update site contact details | EQS Adviser | Int Sys Mgr | 22/02/17 |

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|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------------------------|------------------|
| 10 | Update of Contact Persons information | M Stojanoski | Nat EQS Mgr | 03 May 2018 |
| 11 | Update of 'Inventory of Potential Pollutants on Site' and map of locality and major chemical quantities. | EQS Admin Officer | Nat EQS Mrg | 03 May 2018 |
| 12 | Update of PIRMP in response to EPA desktop audit | Compliance Manager | | 31/05/2018 |
| 13 | Update site address and access details | Compliance Manager | National EQS Adviser | 18/10/2018 |
| 14 | Update Contacts | Environment and Sustainability Business Partner | National EQS Adviser | 10/12/2019 |
| 15 | Addition of DPIE as incident reporting contact | Project Manager | | 10 March 2020 |
| 16 | Detail of how PIRMP is to be tested and maintained Table of Test Dates included The following map shows the surrounding area likely to be affected by a pollution incident. Addition of site Stormwater drainage overview Updated Environment & Sustainability Business Partner information | Environment and Sustainability Business Partner | National Environment and Industrial Risk Manager | 31 July 2020 |
| 17 | Reviewed and updated to include environmental advisor, environmental response, and update site contact details | Environmental Advisor | Environmental Manager NSW | 10 August 2021 |
| 18 | Review and update to Veolia stationary. Replace reference to SUEZ with Veolia. Update site contact persons. | Environmental Manager NSW/ACT | | 5 September 2022 |

PIRMP Tests

| | Staff involved |
|-------------------------|--------------------------------------------|
| 8/4/2020 | Ken Telfer, Linda Douglas |
| 28/06/2021 | Kelly Gee, Scott Carter |
| 02/05/2022 MRF facility | Patrick Abby, John Mak & all staff on site |
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