POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
GLASS RECYCLING (NSW) PTY LTD
5/1 SWAFFHAM ROAD, MINTO

Prepared for: Glass Recycling (NSW) Pty Ltd

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Benbow ENVIRONMENTAL

Engineering a Sustainable Future for Our Environment

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DOCUMENT CONTROL

This Pollution Incident Response Management Plan was originally prepared by Benbow Environmental. Testing and Update Record pages are provided overleaf as a legal requirement.

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PIRMP TESTING & UPDATE REGISTER

It is a legal requirement to test the plan every 12 months and within one month of a pollution incident. The plan needs to be tested and maintained to ensure accurate and up-to-date information is included and that the plan can be implemented effectively.

Record details of how any testing of the PIRMP is undertaken in the table below. Include the names of all staff members who carried out the testing.

PIRMP TESTING RECORD

Date Tested:	Tested by (Name):	Details of Test:	Issues Identified:	Next Scheduled Testing Date:
23-08-2022	L Zanotto	Desktop Scenario	Change to chemical storage on site	August 2023

PIRMP UPDATE DETAILS

Date Updated:	Reason for update:	Details of Update:	Date Uploaded to Website:
23-08-2022	PIRMP Test	Changes to chemical storage	

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Glass Recycling (NSW) Pty Ltd operates a glass recycling facility at Unit 5, 1 Swaffham Road, Minto for which it holds an environment protection licence (EPL No. 21358) with the NSW Environment Protection Authority. Under Part 5.7A of the *Protection of the Environment Operations Act, 1997* (the POEO Act) imposes an obligation on holders of EPLs to prepare, keep, test and implement a pollution incident response management plan (PIRMP).

If a pollution incident occurs during the course of an activity at the site that presents a material risk of harm to the environment, the person carrying out the activity must immediately implement this plan.

A **pollution incident** is a leak, spill or escape of a substance into the surrounding environment that has the potential to result in harm to human health or the environment. It does not include an incident or set of circumstances involving only the emission of any noise.

Any pollution incident that causes or threatens material harm to human health or the environment is required to be **immediately** notified to certain regulatory authorities and neighbouring premises.

This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the *Protection of the Environment Operations (General) Regulation 2009*.

Information required to be made available either on a publicly accessible website or by providing a copy of the plan to any person who makes a written request is presented below as per clause 98D of the Regulation.

NOTIFICATION OF A POLLUTION INCIDENT

When to Notify?

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it **immediately**.

Note: immediately meaning promptly and without delay.

How to notify?

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service

If the incident does not present an immediate threat, or once the initial 000 call has been made:
Notify the relevant authorities in the following order:

1.	NSW Environment Protection Authority	131 555
2.	The Ministry of Health (via Liverpool Public Health Unit)	(02) 9794 0855
	After hours (Ask for Public Health Officer on call)	(02) 8738 3000
3.	SafeWork NSW	13 10 50
4.	Campbelltown City Council	(02) 4645 4000
5.	Fire and Rescue NSW	1300 729 579

Notify other persons as required by the EPA.

What to Notify?

The following information about a pollution incident is to be provided to regulatory authorities:

(a) the time, date, nature, duration and location of the incident,
(b) the location of the place where pollution is occurring or is likely to occur,
(c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
(d) the circumstances in which the incident occurred (including the cause of the incident, if known),
(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
(f) other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

Notifying Neighbouring Premises

Mechanisms for providing early warnings and regular updates to owners and occupiers of neighbouring premises include:

- Website
- Telephone or email
- Signage
- Letterbox drops
- Door knocking

DEFINITIONS

Appropriate regulatory authority	Generally, the appropriate regulatory authority is the EPA for licensed premises and local Council for non-licensed premises. There are exceptions to this definition as stated in Clause 6 of the POEO Act.
Dangerous goods	Substances that are listed in The Australian Dangerous Goods (ADG) Code or that meet the classification criteria specified in that Code.
Environment	As defined in the POEO Act, *"environment" means components of the earth, including:* *(a) land, air and water, and* *(b) any layer of the atmosphere, and* *(c) any organic or inorganic matter and any living organism, and* *(d) human-made or modified structures and areas,* *and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).*
Harm	As defined in the POEO Act, *"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.*
Hazardous chemical	As defined by Safework Australia, *"Hazardous chemicals" are substances, mixtures and articles that can pose a significant risk to health and safety if not managed correctly. They may have health hazards, physical hazards or both.*
Hazards	As defined by Safework Australia, *"Hazards" situations or things that have the potential to harm a person.*
Material risk of harm	"Material risk of harm to the environment" is defined under Section 147 of the POEO Act as: (a) harm to the environment is material if: (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Non-scheduled activity	Under the POEO Act, a “non-scheduled activity” means an activity that is not a scheduled activity and is not scheduled development work.
Occupier	As defined under the POEO Act, "occupier" of premises means the person who has the management or control of the premises.
Pollution	As defined under the POEO Act, "pollution" means: (a) water pollution, or (b) air pollution, or (c) noise pollution, or (d) land pollution.
Pollution Incident	The Environmental Guidelines: Preparation of pollution incident response management plans defines a pollution incident as: “…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.”
Pre-emptive action	Actions taken as a measure against possible or anticipated harm such as use of spill containment kits, installation of stormwater cut-off valves and installation of fire-containment water tanks.
Premises	As defined under the POEO Act, "premises" includes: (a) a building or structure, or (b) land or a place (whether enclosed or built on or not), or (c) a mobile plant, vehicle, vessel or aircraft.
Prevention of pollution	Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs.
Risk	The possibility that harm (death, injury or illness) might occur when exposed to a hazard.
Scheduled activity	"scheduled activity" means an activity listed in Schedule 1 of the POEO Act. Scheduled activities must be licensed under the POEO Act.
Spill kit	A set of equipment used to isolate or control an accidental overflow or release of a substance or material.

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1. INTRODUCTION

Glass Recycling (NSW) Pty Ltd operates a glass recycling facility at 5/1 Swaffham Road, Minto in the Campbelltown local government area. The facility has approval to process more than 30,000 tonnes per annum with a maximum capacity of 60,000 tonnes per annum and hold an EPL for recovery of general waste and waste storage activities. The site accepts waste glass from businesses including window glaziers, recyclers of building materials, building contractors and the automotive industry for use as a raw material to be processed into plate cullet that is on sold to manufacturer's as a raw material in the fibreglass thermal insulation process or as an additive to non-slip concrete.

The site has approval to operate 24 hours 7 days a week. The EPL restricts the unloading of glass in external bays to the following hours:

- 7:00am-6:00pm Monday to Saturday; and
- 8:00am-6:00pm Sundays and public holidays.

The only chemicals on site are in very minor quantities:

- Hydraulic oil – C2 (80 to 100 L)

Identified potential hazards include contaminated stormwater runoff, dust emissions, fire and the resulting contaminated fire fighting water generated with potential to pollute soil and groundwater. Risks of environmental harm resulting from these hazards are generally low.

Under Part 5.7A of the *Protection of the Environment Operations Act, 1997* (POEO Act), Glass Recycling is required to prepare, implement and test a Pollution Incident Response Management Plan (PIRMP). This is aimed at improving the response to pollution incidents and the way they are reported, managed and communicated to regulatory authorities and the community.

This PIRMP has been developed to enable staff and contractors working at the Minto facility to respond effectively and efficiently to any pollution incident that may occur on site and minimise off site impacts and disruption to site operations. In preparing this report, reference is also made to the *Protection of the Environment Operations (General) Regulation 2009* and the NSW EPA *Guideline: Pollution Incident Response Management Plans* (2020).

Glass Recycling Pty Ltd commits to implementing, regularly reviewing and updating this PIRMP and making required elements of the plan publicly available either on the website or upon written request.

1.1 ENVIRONMENT PROTECTION LICENCE (EPL) DETAILS

Environment Protection Licence (EPL) details are provided in Table 1-1.

Table 1-1: EPL Details

Name of Licensee: (including ABN)	Glass Recycling (NSW) Pty Ltd ABN: 22 160 128 316
EPL number:	21358
Premises name and address:	Unit 5/1 Swaffham Road, Minto

Company or business contact details:	Michael Welsh A: PO Box 154, Campbelltown E: admin@glassrecyclingnsw.com.au P: (02) 9618 0400
Website address:	www.glassrecyclingnsw.com.au
Scheduled activities:	Resource recovery Waste Storage
Fee-based activities:	Recovery of general waste Waste Storage - other types of waste

1.2 POLLUTION INCIDENTS EXPLAINED

A **pollution incident** is a leak, spill or escape of a substance into the surrounding environment that has the potential to result in harm to human health or the environment. It does not include an incident or set of circumstances involving only the emission of any noise.

Examples include:

- A spillage of a chemical that escapes the site via a stormwater drain and into an adjacent creek.
- Sediment tracked from vehicle tyres that accumulates on external hardstand surfaces contaminating stormwater after a rain event.
- A fire within a stockpile resulting in release of air pollutants and contaminated fire fighting water into the environment.

Under NSW legislation, any pollution incident that presents a "**material risk of harm**" is required to be notified to certain regulatory authorities and neighbouring premises **immediately**, meaning promptly and without delay. Harm to the environment is material if:

1. It involves actual or potential harm to the health or safety of human beings or ecosystems that is not trivial; or
2. It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000.

If a pollution incident occurs on site this PIRMP is to be implemented even if there is doubt as to whether it presents material risk of harm to the environment.

2. DESCRIPTION & LIKLIHOOD OF HAZARDS

This section provides a description of the main hazards to human health and the environment, the likelihood of these occurring and details of any circumstances that may increase the chances of the risk occurring that are associated with the site activities.

2.1 INVENTORY OF POTENTIAL POLLUTANTS

The table below provides a list of potential pollutants on the site, their location, source and approximate quantity if relevant.

Minor quantities of hazardous chemicals are stored on bunded pallets within the building. The raw materials and finished goods is glass, an inert and non-combustible product.

Table 2-1: Potential Pollutants on Premises

Pollutant	Quantity	Source	Location
Lubricating oil - C2 combustible	80-100 L	Typically 20 L drums stored a bunded pallet	Storage away from ignition sources in 20 L drums – processing building
Contaminated stormwater	Unknown	Runoff/leachate from excessive dust water sprays in building on waste stockpiles/processing areas	Waste stockpiles and sorting within building
	Unknown	Runoff from material tracked outside the building	External areas
Dust	Unknown	Glass storage, processing and transport	Glass storage bays, glass processing area, external storage areas and vehicle paths
Unacceptable wastes	Unknown	Non-conforming incoming loads	Unloading area, quarantine area
Diesel – C1 combustible	Unknown	Fuel brought on site by trucks for refuelling of vehicles.	Unloading area, within building
Contaminated firefighting water	Unknown	Fire on site	Building and internal storage and processing areas

2.2 RISK ASSESSMENT

The level of risk for the main hazards listed in the previous section occurring is assessed using the Risk Analysis Matrices in Table 2-4.

Risk is identified in terms of hazards. To determine the level of risk from a hazard, the likelihood and consequence (level of potential impact) of the hazard occurring are analysed.

Likelihood involves determining how likely an event is to occur. It is the chance that something might happen and is defined for the purposes of this assessment in the following table.

Table 2-2: Likelihood Table

Level	Descriptor	Likelihood Description
A	Almost Certain	Very likely. The event is expected to occur in most circumstances.
B	Likely	Strong possibility. The event will probably occur in most circumstances.
C	Possible	The event might occur at some time.
D	Unlikely	Not expected. There is a slight possibility the event could occur at some time.
E	Rare	Highly unlikely. The event may occur only in exceptional circumstances.

Consequence is defined according to the following table:

Table 2-3: Consequence Table

Level	Descriptor	Consequences Or Impact Description
1	Insignificant	Confined on-site environmental impacts able to be promptly rectified. No injuries. Financial loss less than $2,000.
2	Minor	Confined environmental impacts requiring short term recovery with potentially little or no off-site impacts. First Aid treatment. Financial loss $2,000 to $20,000.
3	Moderate	Confined environmental impacts requiring medium term recovery both on-site and off-site. Medical treatment required. Financial loss $20,000 to $200,000,
4	Severe	Unconfined environmental impacts requiring long term recovery and leaving residual damage both on-site and off-site. Extensive injuries, loss of product capability. Financial loss $200,000 to $1M.
5	Catastrophic	Widespread environmental impact requiring long term recovery and leaving major damage both on-site and off-site. Death. Financial loss more than $1M.

Table 2-4: Risk Matrix

Likelihood	Consequence					
		Insignificant 1	Minor 2	Moderate 3	Severe 4	Catastrophic 5
	A (almost certain)	LOW	MED	HIGH	HIGH	HIGH
	B (likely)	LOW	MED	HIGH	HIGH	HIGH
	C (possible)	LOW	MED	MED	HIGH	HIGH
	D (unlikely)	LOW	LOW	MED	MED	MED
	E (rare)	LOW	LOW	LOW	MED	MED

The area shown in red indicates a high level of risk which is intolerable and where risk reduction is required through controls or mitigation measures. This requires the reduction of frequency and/or consequence.

The area shown in yellow indicates a moderate level of risk. Whilst the risk is not unacceptable, there should be practical measures taken to lower the risk if economically viable.

The area shown in green indicates a low level of risk and is broadly considered to be acceptable. Further risk mitigation may not be required/appropriate. However, low and accepted risks should be monitored and routinely reviewed to ensure that they remain acceptable.

Table 2-5 provides a risk assessment of the potential hazards that could occur at the site with no control measures in place. Table 2-6 provides a risk assessment with all safeguards, controls and mitigation measures in place.

Table 2-5: Hazard and Likelihood Risk Assessment with no Control Measures

Hazard/Incident	Likelihood	Consequence	Level of Risk	Activities which may increase the potential of the hazard occurring
Dangerous Goods spill	Possible	Minor	**Medium Risk**	Vehicle collision Plant or equipment failure Leakage whilst refuelling
Contaminated stormwater	Likely	Moderate	**High Risk**	Excessive rainfall
Fire	Unlikely	Catastrophic	**Medium Risk**	Plant or equipment failure Smoking Spontaneous combustion Bushfire Arson
Asbestos	Possible	Severe	**High Risk**	Customer breach Illegal dumping
Dust	Possible	Moderate	**Medium Risk**	Plant or equipment failure together with dry weather and high wind. Excessive truck movements

Table 2-6: Hazard and Likelihood Risk Assessment with Control Measures in place

Hazard/Incident	Control Measures	Likelihood	Consequence	Level of Risk
Dangerous Good spill	Designated storage areas Spill kit EMP	Unlikely	Minor	Low Risk
Contaminated stormwater	Designated storage areas Spill kit Bunded pallets for oil Enviropod gross pollutant traps EMP	Unlikely	Minor	Low Risk
Fire	Fire protection equipment Designated storage areas Spill kit Bunded pallets for chemicals EMP Workplace inspection	Rare	Catastrophic	Moderate Risk
Asbestos	Incoming waste procedure Waste specification Workplace inspection	Unlikely	Minor	Low Risk
Dust	EMP Air Control Procedure Dust suppression system Dust collection system Workplace inspection	Unlikely	Minor	Low Risk

2.3 HAZARDS TO HUMAN HEALTH

Hazards to human health and the environment associated with the activity and the likelihood of such hazards occurring have been identified in the risk assessment in Section 2.2. With mitigation measures in place the risk of these hazards occurring is low. Potential hazards include:

- Dangerous goods or chemical spill resulting in exposure of harmful chemicals to humans and/or contamination of waterways.
- Build up of sediment from spillage of materials and vehicle tracking on hardstand areas resulting in contaminated stormwater after a rain event.
- Fire resulting in contaminated firefighting water and air pollutants associated with a diesel/hydraulic oil fire such as particulates, carbon monoxide (CO), oxides of nitrogen (NOx), and volatile organic compounds (VOCs).
- Asbestos found in incoming material resulting in exposure to humans and/or contamination of raw materials causing waste management issues or contamination of the environment.
- Excessive emissions of dust resulting in potential health issues and contamination of waterways.

3. MINIMISING RISK OF HARM

This section details the actions to be taken immediately following a pollution incident including pre-emptive actions, use of safety equipment, early warning mechanisms and reducing the risk of harm.

3.1 PRE-EMPTIVE ACTION

Glass Recycling (NSW) Pty Ltd would implement a number of pre-emptive actions to prevent or minimise any risk of harm to human health or the environment.

Pre-emptive actions include but are not limited to the use of the following:

- Spill containment kits;
- Fire protection equipment;
- The site surfaces to be maintained in good condition by regular cleaning;
- A Donaldson Torit DCE Unimaster dust collector to service the crusher;
- Water sprayers for dust suppression installed within the building and on external storage bays;
- Enviropod gross pollutant traps on stormwater pits;
- External storage within designated bays (tarps are used to cover incoming glass);
- Preventative Maintenance.

3.2 SAFETY EQUIPMENT

Safety equipment includes:

- First aid kits;
- Spill kit; and
- Personal Protective Equipment (PPE) gear including: Ear muffs, eye protection, gloves, high visibility vests, safety boots, work clothes.

3.3 FIRST AID

In the event of a pollution incident impacting the health of a person, the following should be followed:

- Dial 000 – emergency services if the person has suffered serious injury and needs immediate medical attention.
- Conduct basic first aid if trained to do so.
- Report the incident on the incident report form provided in the Site's Environmental Management Plan.
- Follow up by undertaking corrective and preventative actions as required by the procedure in the Site's Environmental Management Plan.

4. MAPS AND PLANS

The following maps and plans show:

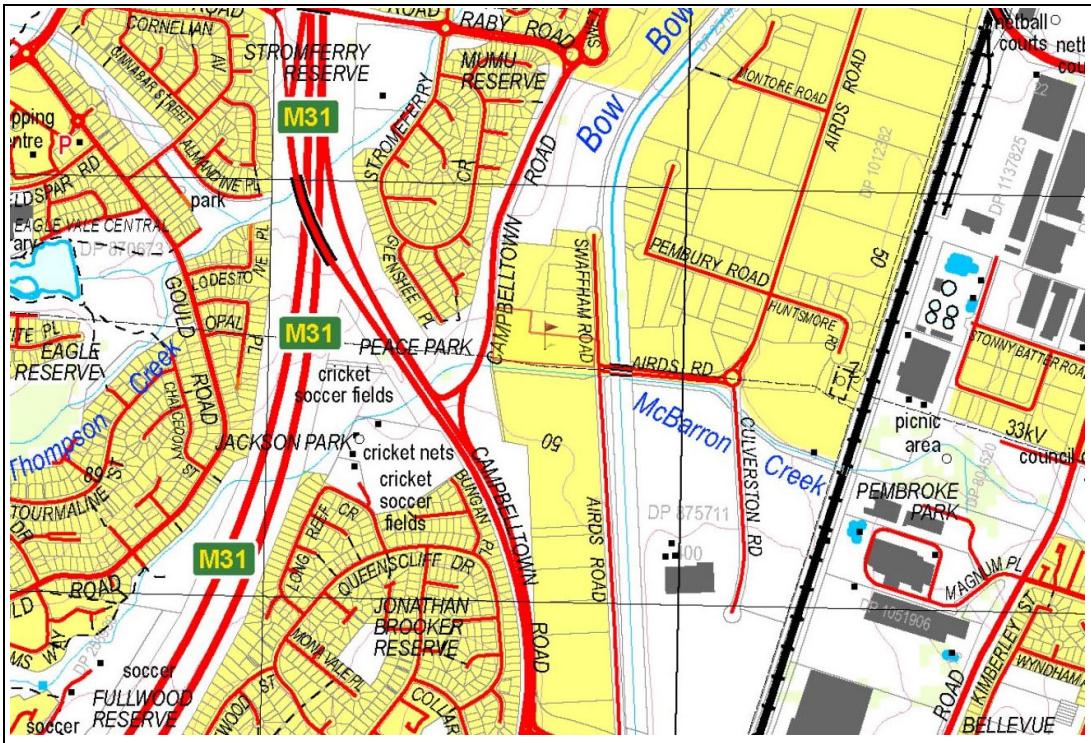
- The location of the site (Aerial view as Figure 4-1 and Locality map with contours as Figure 4-2);
- Surrounding area (Figure 4-3); and
- Site plan showing locations of processing equipment and storage areas (Figure 4-4).

Figure 4-1: Aerial view of Site

Source: Six Maps

↑N Not to scale	Site Boundaries (1 Swaffham Road):	Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152

Figure 4-2: Locality map showing contours



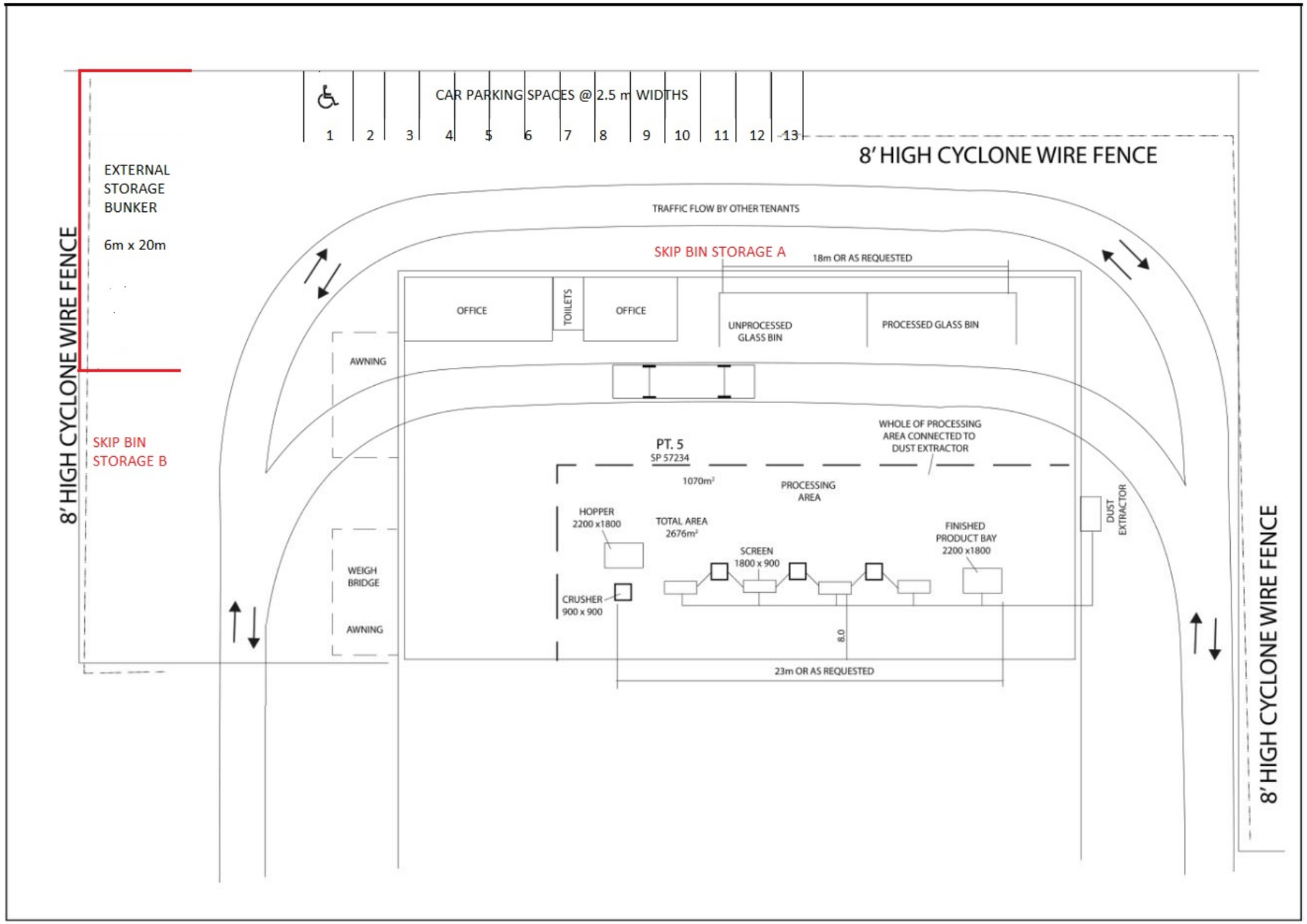
Source: Six Maps

↑N Not to scale	Site Boundaries (1 Swaffham Road):	Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152

Figure 4-3: Surrounding area

↑N Not to scale	Site Boundaries (1 Swaffham Road): Unit 5 Building Boundaries: **Source:** Google Maps	Adjoining premises: A: Toyo Tyres, 149 Airds Road, Minto B: Storage facility, 3 Swaffham Road, Minto C: Industrial Units, 13 Swaffham Road, Minto	Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152

Figure 4-4: Site Plan



5. CONTACT DETAILS

Contact details for of site personnel responsible for activating the plan, notifying relevant authorities and managing response to a pollution incident are included in this section. The site must have contact persons including 24-hour contact details and alternative person/s should the primary contact be unavailable.

5.1.1 Site Contacts

The following table lists the key individuals for the site that are the first point of contact in the event of a pollution incident.

Table 5-1: Site Contacts

	Primary Contact	Alternative Contact
Name of person responsible:	Michael Welsh	Sharryn Wells
Position or Title:	Director	Office Manager
Business hours Ph:	0414 482 693	(02) 9618 0400 (10am to 6pm)
After hours Ph:	0414 482 693	0425 367 397
Email:	admin@glassrecyclingnsw.com.au	admin@glassrecyclingnsw.com.au

5.1.2 Regulatory Authority Contacts

A pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified **immediately** to relevant authorities.

If the incident presents an immediate threat to human health or property, call 000 immediately. If the incident does not require emergency services, notify the following regulatory bodies, in order of relevance, as follows:

1. NSW Environment Protection Authority 131 555
2. The Ministry of Health (via Liverpool Public Health Unit) (02) 9794 0855
   After hours (Ask for Public Health Officer on call) (02) 8738 3000
3. SafeWork NSW 13 10 50
4. Campbelltown City Council (02) 4645 4000
5. Fire and Rescue NSW 1300 729 579

5.1.3 Notification of Neighbours and the Local Community

The nearest sensitive residential receptors and neighbouring industrial facilities have been identified in the following Table 5-2 and are shown in Figure 5-1.

Table 5-2: Nearest Sensitive Receptors

Receptor ID	Address	Lot & DP	Approximate distance to site boundary (m)	Type of Receptor
R1	9 Indaal Pl, St Andrews	Lot 210 in DP259912	65 m NW	Residential
R2	17 Glenshee Pl, St Andrews	Lot 229 in DP259912	90 m W	Residential
R3	4 Wick Place, St Andrews	Lot 339 in DP260428	290 m N	Residential
R4	21 Opal Place, Eagle Vale	Lot 505 in DP804404	590 m SW	Residential
R5	42 Long Reef Cres, Woodbine	Lot 191 in DP261169	495 m SW	Residential
R6	19 Bungan Pl, Woodbine	Lot 1010 in DP258856	265 m S	Residential
R7	46 Kimberley St, Leumeah	Lot 155 in DP259456	1180 m SE	Residential
R8	11 Borthwick St, Minto	Lot 8 in DP249972	1220 m E	Residential
R9	1 Redfern Road, Minto	Lot 1 in DP435314	1780 m NE	Minto Public School
R10	93 Townson Ave, Minto	Lot 33 in DP716484	1590 m E	Campbellfield Public School
R11	44/48 Westmoreland Road, Minto	Lot 2 in DP560014	1870 m SE	Zahra Grammar School
R12	61 Emerald Drive, Eagle Vale	Lot 493 in DP709741	1220 m SE	Mary Immaculate Parish Primary School
R13	2 Brial Pl, Minto	Lot 38 in DP261474	1790 m E	Childcare Centre Dummies & Playdates Nanny & Babysitting Agency

Figure 5-1: Aerial photograph showing nearest sensitive residences including schools, hospitals and aged care centres

↑N Not to scale	Refer to Table 5-2 for identification of sensitive receptors **Source:** Google Maps	Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152

6. RESPONSE ACTIONS FOR POLLUTION INCIDENTS

An Emergency Control Organisation (ECO) has been established for the site and consists of a group of site personnel that has the responsibility of providing first response action to an emergency in terms of organising the necessary resources, communications, evacuation of personnel and implementing any corrective actions that may be necessary to return the emergency situation back to normal. The same applies for a pollution incident. Specific details of the ECO are provided in the following table.

Table 6-1: Emergency Contacts

Position	Name	Telephone
Chief Warden	Michael Welsh	0414 482 693
Deputy Chief Warden	Dave Welsh	0419 682 467
Communications Officer	Sharryn Wells	(02) 9618 0400
First Aid Officer	Sharryn Wells	(02) 9618 0400

A simple flowchart detailing how to respond in the event of a pollution incident is provided as Figure 6-1.

6.1 IMMEDIATE ACTIONS

In the event of a pollution incident, the first response of personnel on site based on their initial assessment is to phone 000 in an emergency.

Initial assessment needs to be made by ECO members present on site by asking:

- What is the substance emitted?
- What are its properties?
- Is there an immediate threat to personnel or surrounding areas?
- What quantity/volume has been released off site?
- Is there equipment available to contain the pollution?
- Does the emission have potential to cause material harm?

If safe to do so:

1. Remove all persons from immediate danger (if required)
2. Stop the source of the emission
3. Secure/Isolate the area
4. Commence evacuation (if required)

If the pollution incident is causing or threatening material harm, regulatory authorities and neighbouring properties need to be notified as per Section 6.2.

6.2 NOTIFICATION OF A POLLUTION INCIDENT

Figure 6-1 provides a flowchart on how to notify in the event of a pollution incident.

Staff onsite must contact key site personnel responsible for activating the PIRMP and notifying authorities:

Primary contact:	MICHAEL WELSH - 0414 482 693
Alternative contact:	SHARRYN WELLS - (02) 9618 0400
	DAVID WELSH - 0419 682 467

6.2.1 When to Notify?

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it **immediately**.

Note: immediately meaning promptly and without delay.

6.2.2 How to notify?

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service

If the incident does not present an immediate threat, or once the initial 000 call has been made:
Notify the relevant authorities in the following order:

1.	NSW Environment Protection Authority	131 555
2.	The Ministry of Health (via Liverpool Public Health Unit)	(02) 9794 0855
	After hours (Ask for Public Health Officer on call)	(02) 8738 3000
3.	SafeWork NSW	13 10 50
4.	Campbelltown City Council	(02) 4645 4000
5.	Fire and Rescue NSW	1300 729 579

Notify other persons as required by the EPA.

6.2.3 What to Notify?

The following information about a pollution incident is to be provided to regulatory authorities:

(a) the time, date, nature, duration and location of the incident,
(b) the location of the place where pollution is occurring or is likely to occur,
(c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
(d) the circumstances in which the incident occurred (including the cause of the incident, if known),
(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
(f) other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

6.2.4 Notifying Neighbouring Premises

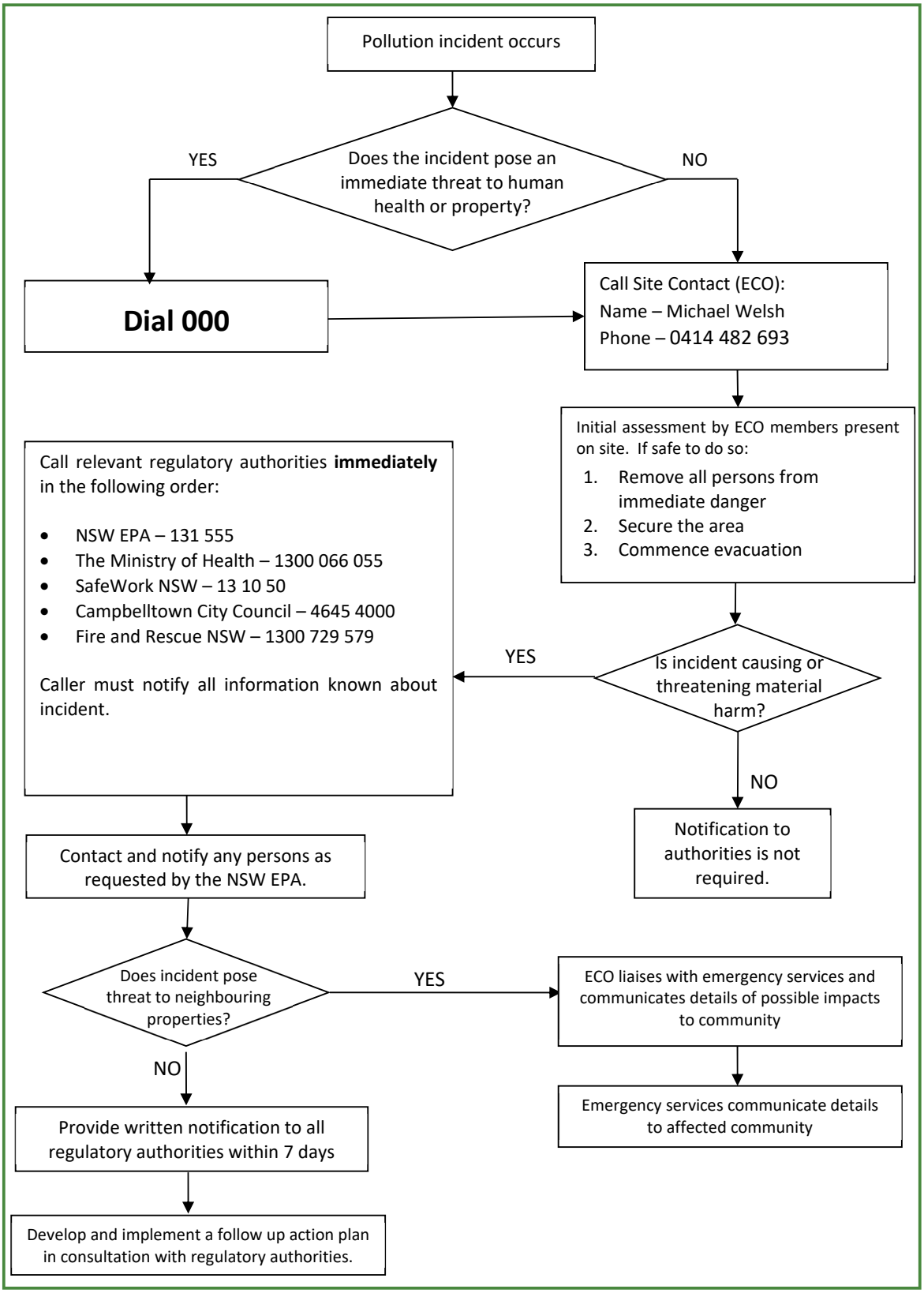
For any incident that has a risk on human health or the environment external to the site, early warnings and regular updates will be provided to any premises or neighbouring facility or resident likely to be affected. This would be undertaken by key individuals.

A variety of communication mechanisms are available to provide early warnings and regular updates depending on the type, scale and nature of the incident, including:

- Website
- Telephone or email
- Signage
- Letterbox drops
- Door knocking

Specific information would be provided to potentially affected premises via the above avenues to minimise the risk of harm as appropriate to the circumstances.

Figure 6-1: How to notify in the event of a Pollution Incident



6.3 CONTAIN THE POLLUTION

Prevent the emission or spill from further spreading by:

- Placing absorbent material such as vermiculite or sand on the spill;
- Turning off equipment to prevent emissions of dust if incident relates to failure of dust controls;
- Using barriers such as spill absorbents, sand bags, hay bales or other covers, prevent the emission from spreading.
- Isolate any stormwater drains (if necessary) using sand bags, hay bales or drain covers.

6.4 CLEAN UP

Implement remedial actions to clean up the pollution. It is recommended that a qualified environmental professional be consulted to ensure appropriate clean up actions are taken.

- Consult safety data sheets (if applicable).
- Sampling and testing of any waste generated as a result of the spill/release in accordance with the Waste Classification Guidelines.
- Disposal of any contaminated material in accordance with waste legislation;
- Sample and test any water bodies for potential pollution;
- Consult with relevant regulatory authorities on any clean up or remediation required.
- Undertake the remediation.

6.5 INCIDENT INVESTIGATION

Incident investigation and reporting shall be undertaken in consultation with EPA and local Council as required. The following shall be undertaken at a minimum:

- Complete internal reporting using the incident report form provided in the Site's Environmental Management Plan;
- Conduct an investigation with guidance from a qualified environmental professional and the NSW EPA; and
- Implement the Corrective and Preventative Actions Procedure (refer to Environmental Management Plan)

6.6 INCIDENT REPORTING & FOLLOW UP

Written notification to all of relevant regulatory authorities needs to be undertaken within 7 days of the incident. Information to be included is provided in the Site's Environment Protection Licence.

A follow up action plan would then be developed and implemented in consultation with the relevant regulatory authorities.

The PIRMP needs to be tested one month after any incident to ensure effectiveness as per Section 8. Any changes need to be documented.

7. STAFF TRAINING

Glass Recycling (NSW) Pty Ltd employees must complete a number of training inductions in order to undertake work on site. Specific training is required for the ECO and Senior Management is specified in the Site's Environmental Management Plan.

Specifically, training to be included in the induction in relation to this plan is recommended to include:

- Response actions for dealing with an emergency or pollution incident – specifically for anyone involved in or witness to a pollution incident in relation to who and when to notify site contacts.
- Individual responsibilities and the responsibilities of key site contacts in relation to the PIRMP.

Specific training on how to respond in the event of a pollution incident as described in Figure 6-1 would need to be undertaken by staff members with key responsibilities including:

- ECO members; and
- Senior Management (refer to Table 5-1).

These staff members would also need to be aware of any specific responsibilities in relation to the pollution incident response management plan.

8. TESTING OF PLAN

Pollution Incident Response Management Plans must be tested routinely every 12 months and within one month of any pollution incident that warrants reporting. This PIRMP was first prepared in August 2021. Therefore the first date for testing and review would be August 2022 at the latest.

Testing of the PIRMP would be incorporated with the testing of the existing emergency plan (if available) and needs to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner.

Testing must cover all components of the plan and would be undertaken as a desktop assessment to check for the following:

- Contact details are correct;
- Details of chemical storage, use and potential pollutants are up to date;
- Procedures are practicable;
- Any changes to legislation relevant to the plan is addressed;
- Details of safety equipment is correct;
- Update any changes to maps and plans in relation to the PIRMP; and
- Check the effectiveness of training undertaken including toolbox meetings and site induction.

Records of testing and reviews are maintained on the PIRMP testing and update register page at the front of this report. Copies of test records are provided in the attachments.

This concludes the report.

Linda Zanotto
Senior Environmental Engineer

R T Benbow
Principal Consultant

9. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Glass Recycling Pty Ltd, as per our agreement for providing environmental services. Only Glass Recycling Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Glass Recycling Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

10. REFERENCES

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ATTACHMENTS

Attachment 1: PIRMP Testing Records

PIRMP TESTING RECORD

Company Name:	Glass Recycling NSW Pty Ltd
Site Address:	5/1 Swaffham Road, Minto
EPL No.	21358
Date & Time:	23/08/2022
Location:	Site: Unit 5/1 Swaffham Road Minto
TESTING DETAILS	
Testing (tick):	☑ Desktop scenario ☐ Practical exercise / drill
Description:	**Scenario:** Drums of diesel have been moved outside for unknown reasons and one full drum is knocked over. The lid comes off and diesel spills out onto the concrete and enters a stormwater pit.

ATTENDANCE RECORD	
Name	**Position**
Mick Welsh	Manager / Director
David Welsh	Operations Manager
Sharryn Wells	Office Manager
Jaimee Wells	Office Assistant

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PIRMP TESTING RECORD

ELEMENTS COVERED	
Topics Covered:	**(Tick)**
• Immediate actions taken	☑
• Site emergency contacts notified – names and phone numbers. Who decides when the PIRMP needs to be activated?	☑
• Notification protocol – Who has the responsibility to notify authorities? When to notify? Who to notify? What to notify? Surrounding premises – check maps and plans.	☑
• Other response actions to be taken – clean up – incident investigation – reporting and follow up.	☑
• Safety equipment – PPE – spill kits/fire protection equipment/other mitigation measures and controls – all available and in working order?	☑
• Review of potential pollutants, hazardous chemicals, hazards and risks section of PIRMP. Is this up to date and relevant?	☑
• Awareness of individual responsibilities in the event of a pollution incident or emergency. Any training undertaken?	☑

NOTES / ISSUES IDENTIFIED

On 23 August 2022, PIRMP testing was undertaken at the site at 10am. The purpose of the PIRMP and topics listed above were discussed then the desktop scenario was presented and the questions listed below were discussed. Issues identified were that there is no longer diesel stored on site. Vehicles are refuelled using a truck that is driven on site for that purpose. No paint is kept on site. Oil quantities are less than what was stated. Site contact details are correct and site personnel are aware of who needs to be contacted and under what circumstances. A new spill kit is on order and expected to be delivered this week. The PIRMP will be updated to reflect the minor changes.

Testing Completed by: **LINDA ZANOTTO of BENBOW ENVIRONMENTAL** (Name of trainer)

Signed: 

Date: 23/8/2022

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PIRMP TEST - HANDOUT

Company Name:	Glass Recycling NSW Pty Ltd
Site Address:	5/1 Swaffham Road, Minto
EPL No.	21358
Date:	23/08/2022
TESTING DETAILS	
Testing (tick):	☑ Desktop scenario ☐ Practical exercise / drill

SCENARIO #1

Quick 2 min introduction to spill kits video: https://youtu.be/0gEnV0WBx9c

Drums of diesel have been moved outside for unknown reasons and one full drum is knocked over. The lid comes off and diesel spills out onto the concrete.

DISCUSSION POINTS

1. What are the immediate actions you would take?
2. At what point does the PIRMP need to be activated?
3. The diesel has entered the stormwater pit before it could be contained using items from the spill kit. What would you do in this situation?
4. What surrounding neighbours would you notify and how would this be done?
5. What other actions would you take to clean up the pollution?
6. What follow up actions would you take after the incident? Would you change anything to try to prevent future spills?

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