

# Premises Pollution Incident Response Management Plan (PIRMP)

Revision Date	Revision Description	Author	Approved
2015-11-02	Review Contact List, Incident Report and Risk Matrix	R Fieslaar	J Germany
2017-10-10	Change in Management Structure, key positions	R Fieslaar	J Germany
2018-02-12	Change of DG Stores / Site Map / Risk Methodology	C Manosa	J Germany
2019-03-04	Site plan and chemical locations changed. Added new spill response appendices and upgraded risk appendix. Section 9.1 controls updated.	C Manosa	J Germany
2020-03-25	Transfer to new template, review of risks, contacts, addition of EPL details. Using EPA template as guidance	L Quintal	M Oxman
2020-07-03	Change of Management	L Quintal	M Oxman

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## **1.0 SCOPE**

Environment Treatment Solutions Pty Ltd (ETS) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste and Waste processing (non-thermal treatment).

As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates. If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan is kept at 79 Marshalls Lane, Blayney NSW 2799. The plan is made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan. Parts of the plan are accessible on the ETS website and by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: 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.

### **1.1 Key Aspects of the PIRMP**

This Pollution Incident Response Management Plan (PIRMP) covers the key actions to minimise the occurrence of a pollution incident and manage a pollution incident if one occurs (during and after a pollution incident).

This document has been prepared for managing the impact to human health (employees and nearby neighbours) and the environment (onsite and offsite).

### **1.2 Background to Environmental Treatment Solutions**

Environmental Treatment Solutions (ETS) is located at 79 Marshalls Lane, Blayney NSW 2799 in the strategically zoned industrial area of Blayney NSW.

The facility conducts the storage and processing of hazardous, restricted and solid classified waste streams generated by commercial and industrial clients.

## **2.0 DEFINITIONS**

Not applicable to this procedure

## **3.0 FLOWCHART**

Not applicable to this procedure

## 4.0 ACTIVITY

### 4.1 Environment protection licence (EPL) details

The following details the EPL Details for ETS:

<b>Name of Licensee:</b>	ENVIRONMENTAL TREATMENT SOLUTIONS PTY LTD
<b>ABN:</b>	36126020451
<b>EPL Number:</b>	13230
<b>Premises Name and Address:</b>	ENVIRONMENTAL TREATMENT SOLUTIONS BLAYNEY 79 Marshalls Lane Blayney NSW 2799
<b>Company or business contact details:</b>	ENVIRONMENTAL TREATMENT SOLUTIONS PTY LTD P. (02) 9603 3666 F: (02) 8078 0197
<b>Website Address:</b>	<a href="http://www.envirotreat.com.au/">http://www.envirotreat.com.au/</a>
<b>Scheduled activity / activities on EPL:</b>	Waste processing (non-thermal treatment) Waste storage
<b>Fee based activity / activities on EPL:</b>	Non-thermal treatment of hazardous and other waste - Any annual processing capacity Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste - Any listed waste type stored

#### 4.2 Pollution Incident – Person/s Responsible

The following contact details are 24- hour contacts including alternative person should the primary contact be unavailable.

<b>PIRMP Activation (Primary Contact)</b>	
Name of Person Responsible:	Michael Oxman
Position:	Site Manager
Business Hours Contact Number:	P. (02) 6368 4080 0417 657 597
After hours Contact Number:	0438 062 082
Email	Michaelo@envirotreat.com.au

<b>PIRMP Activation (Secondary Contact)</b>	
Name of Person Responsible:	Brad Williams
Position:	ETS General Manager
Business Hours Contact Number:	P. (02) 9603 3666 0429 655 325
After hours Contact Number:	0429 655 325
Email	Brad.williams@remondis.com.au

<b>Notifying Relevant Authorities</b>	
Name of Person Responsible:	Michael Oxman
Position:	Site Manager
Business Hours Contact Number:	P. (02) 6368 4080 0417 657 597
After hours Contact Number:	0438 062 082
Email	Michaelo@envirotreat.com.au

<b>Managing Response to Pollution Incident</b>	
Name of Person Responsible:	Michael Oxman
Position:	Site Manager
Business Hours Contact Number:	P. (02) 6368 4080 0417 657 597
After hours Contact Number:	0438 062 082
Email	Michaelo@envirotreat.com.au

#### 4.3 Notification to Relevant Authorities

As part of Part 5.7A of the POEO Act, in case of a pollution incident that causes or threatens to cause material harm to the environment, the relevant authorities are to be contact and include:

Notification of Relevant Authorities	
1. Fire & Rescue NSW and/or Police Orange Rural Fire Service	000 (first notification)
2. Environment Protection Authority	131 555
3. Health NSW – Bathurst Hospital	361 Howick St, West Bathurst NSW 2795 (02) 6330 5000
4. SafeWork NSW	131 050
5. Blayney Shire Council	91 Adelaide Street, Blayney NSW 2799 (02) 6368 2104 Mark Dicker Director Planning and Environmental Services 02 6368 2104 / 0409 742 432
6. NSW Office of Environment and Heritage Sub Department – Bathurst Regional Office	(02) 6332 7600
7. NSW Ministry of Health – Bathurst Regional Office Public Health Officer (24 hours)	(02) 6339 5601  0428 400 526

#### 4.4 Notification of Neighbours and the Local Community

Notification of neighbours and the local community	
Mid-West Concrete	Max Osborn (02) 6368 24444 or M: 0429 682 444
Country Energy Substation	Anthony Burrell (02) 6368 3865 or 13 23 91
Fenton's Bus Service	Murray Fenton (02) 6336 1837 or 0413 001 687
Australian Queen Bee	Rowena Spears (02) 6368 3800
St Joseph's School	(02) 6368 2243 / 0447 055 339
Harry Marshall	(02) 6368 3788
TWS	(02) 6368 3455
ICR	(02) 6368 3067
Trussco	(02) 6368 3888

ETS is located close to nearby receptors. The nearest residential properties are located further than 250m from the facility. Other key features near the ETS facility include:

Mid West Concrete / Country Energy / Fenton's Bus Service / Australian Queen Bee / St Joseph's School / TWS / Harry Marshall / ICR

#### **4.5 How Neighbours will be Informed**

In the event of a pollution incident, ETS will immediately contact the above list. The following notification methods will include but not limited to:

- Face to face contact
- Telephone to advise community stakeholders of the incident with recommended actions to prevent or minimise harm such as close doors and windows, evacuate buildings or premises, not to drink or swim in water courses.
- Potentially affected community members will be determined based on the nature / scale of the pollution incident and the current weather conditions.

Follow up communications with the community stakeholders will be carried out by the ETS Staff. Further undertakings include but are not limited to the following:

- Face to face contact or telephone call
- Letter drops
- Publication of updates on ETS Websites
- Emailing of updates
- Door-knocking

#### **4.6 Description of Likelihood of Hazards**

Refer to Pollution Risk Assessment for Blayney

#### **4.7 Pre-emptive Actions to be Taken**

In the event of a pollution incident that will cause harm to the environment, the following pre-emptive actions are in place:

- Confirm material involved;
- Wear suitable protective clothing;
- Prevent entry of chemical / material into drain or waterway using the spill control kits provided. Block any 'at risk' drains and divert any fast flowing liquid spills away from any sensitive areas;
- Place barriers across the storm water drains;
- Avoid contact or inhalation of released material;
- Don't walk through spills;
- Clean up spill using absorbent pads and / or material in the spill kits provided.

In the event of a pollution incident that will cause harm to human health, the following pre-emptive actions are in place:

- Wear suitable protective clothing;
- Avoid contact or inhalation of released material;
- Walk outside to the open air and remove yourself from the substance release area;

## 4.8 Inventory of Pollutants

UN Number	Name of substance	Location of substance	Type of Store	DG Class	Packaging Group	Quantity	Package size
<b>Dangerous Goods</b>							
1993	Flammable Liquid NOS	MXDG	Roofed Store	3	II	Up to 30 000 Kg	IBCs, 205 L and 20 L
1760	Corrosive Liquid NOS (Acid)	MXDG, CON1	Roofed store, shipping container	8	II	Up to 15 000 Kg	IBCs, 205 L and 20 L
1760	Corrosive Liquid NOS (Base/alkali)	MXDG	Roofed Store	8	II	Up to 15 000 Kg	IBCs, 205 L and 20 L
2810	Toxic Organic Liquid NOS	MXDG, CON2	Roofed store, shipping container	6.1	II	Up to 2 500 Kg	IBCs, 205 L and 20 L
2929	Toxic Liquid, Flammable Organic NOS	MXDG	Roofed Store	6.1(3)	II	Up to 2 500 Kg	IBCs, 205 L and 20 L
1479	Oxidising Liquids/ Solids	CON2	Shipping container	5.1	II	Up to 1000 Kg	IBCs, 205 L and 20 L
1325	Flammable Solid	CON2	Shipping container	4.1	II	Up to 500 Kg	205 L and 20 L
3208	Water Reactive Substances	CON2	Shipping container	4.3	II	Up to 500 Kg	205 L and 20 L
1689	Cyanide	MXDG	Roofed Store	6.1	I	Up to 2 500 Kg	IBCs, 205 L and 20 L
1079	Sulphur Dioxide	CON2	Shipping Container	2.3(8)	II	Up to 1 600 L	800 L cylinders
1954	Compressed Flammable Gas NOS	FXS2	Open Store	2.1	II	Up to 1 500 L	> 200 L
1956	Compressed Gas NOS	CON2	Open Store	2.2	II	Up to 1 500 L	> 100 L
1955	Compressed toxic gas NOS	CON2	Open Store	2.3	II	Up to 500 L	>100 L
<b>Non-Dangerous Goods</b>							
NA	Pesticide Liquids	MXDG	Roofed Store	NA	NA	Up to 5 000 Kg	IBCs, 205 L and 20 L
NA	AFFF/ PFAS Contaminated Water	PRO2	Roofed Store	NA	NA	Up to 130 000 Kg	IBCs, 205 L and 20 L
NA	Wash water	FXS1	Roofed Store	NA	NA	Up to 100 000 Kg	15 000 L tank, IBCs, 205 L and 20 L
NA	Landfill	FXS1, MXDG, PRO1	Roofed Store	NA	NA	Up to 10 000 Kg	IBCs, 205 L and 20 L
NA	Contaminated Soil	FXS1	Roofed Store	NA	NA	Up to 100 000 Kg	BULK



#### 4.9 Safety equipment

The following safety equipment / devices is used to minimise the risks to human health or the environment and to contain or control a pollution incident.

Product Name	Location of where the equipment is stored	Maintenance Requirements
Fire Extinguisher	Refer to Map in Section 4.13	6 Monthly
Spill Kit	Refer to Map in Section 4.13	Monthly
PPE	Tools Store / Office	Weekly
SDS	Office / Organisation Network	Annual Review
First Aid Kit	Office	Weekly
Safety Signage	Across Site	Weekly
Safety Shower	Refer to Map in Section 4.13	Monthly

#### 4.10 Communicating with neighbours and the local community

In the event of a pollution incident, ETS will immediately contact the above list. The following notification methods will include but not limited to:

- Face to face contact
- Telephone to advise community stakeholders of the incident with recommended actions to prevent or minimise harm such as close doors and windows, evacuate buildings or premises, not to drink or swim in water courses.
- Potentially affected community members will be determined based on the nature / scale of the pollution incident and the current weather conditions.

Follow up communications with the community stakeholders will be carried out by the ETS Staff. Further undertakings include but are not limited to the following:

- Face to face contact or telephone call
- Letter drops
- Publication of updates on ETS Websites
- Emailing of updates
- Door-knocking

#### 4.11 Minimising harm to persons on the premises

All staff and contractors are to be inducted before completing any work on site. The induction includes procedures for minimising the chance of a pollution incident occurring, managing a pollution incident and actions following a pollution incident.

Minimising the impact to persons at ETS during a pollution incident is the highest priority

Additional examples of minimising harm to persons on the premises include:

- Risk Assessments on Work Tasks
- SDS Documentation

- Work Procedures
- Incident and Hazard Management
- Inspections and workplace audits
- ISO 14001:2015 Environment Management System Certification
- ISO 9001:2015 Quality Management System Certification
- AS/NZS 4801:2001 Safety Management Australian Standard Certification
- ISO 45001:2018 Occupational health and Safety Management System Certification
- Emergency Management
- Site Integrated Management Plans;
- Regular inspections and Maintenance;
- External Land Studies
- External Dangerous Goods Reports
- Correct storage and waste management; and
- Training

In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site evacuation procedure. All staff are informed on the location of muster locations through the site inductions, signage and training. As part of the preparations for the PIRMP, the key aspects of the plan will be provided to staff and contractors.

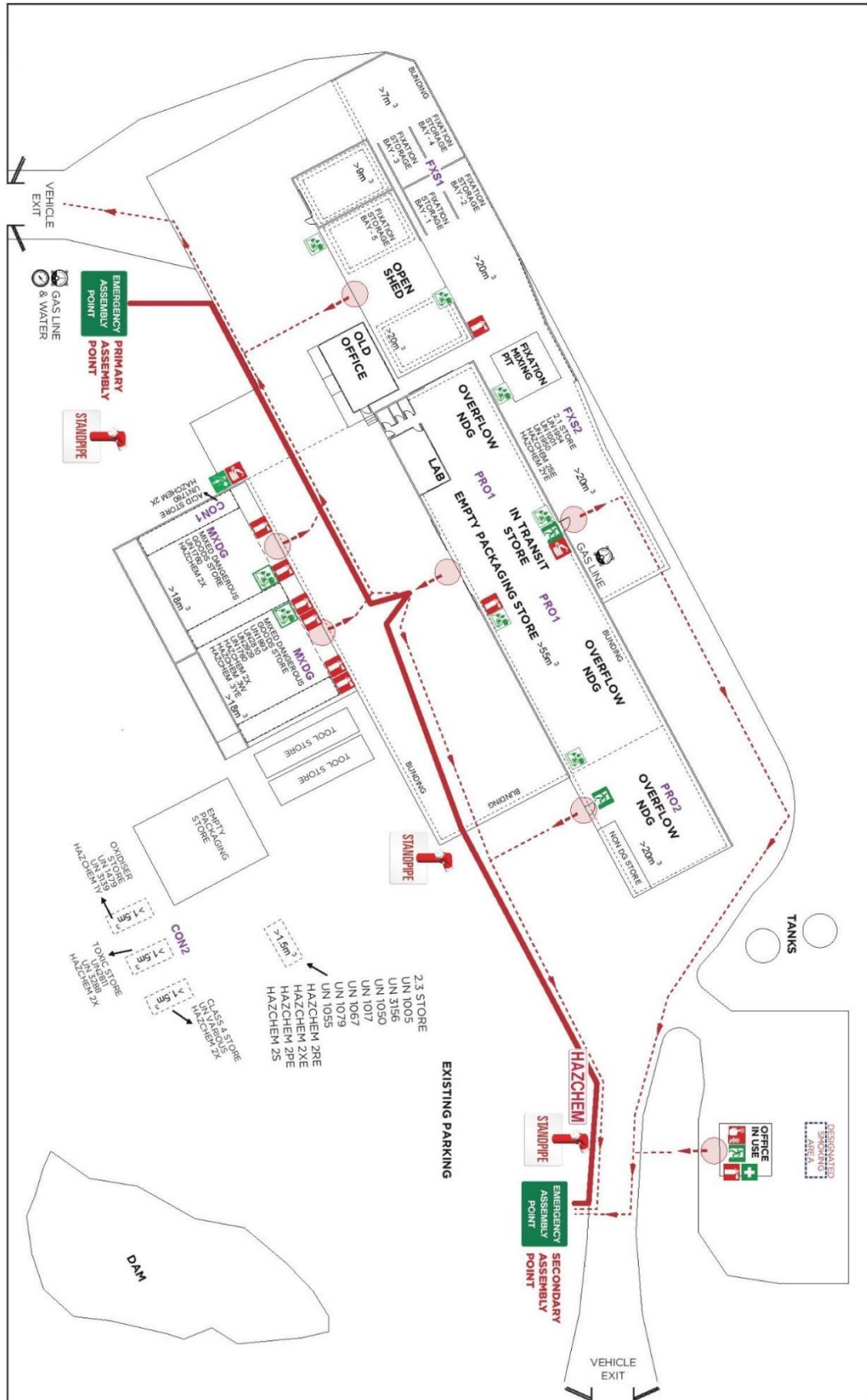
Refer to Section 4.6: Description of Likelihood of Hazards – Pollution Risk Assessments

Refer to Section 4.7: Pre-emptive Actions to be taken

4.12 Location of Surrounding Area and Potential Pollutants



4.13 Location of Emergency Equipment



#### **4.14 Actions to be Taken during or Immediately after a Pollution Incident**

##### **4.14.1 Actions to Minimise a Pollution Incident**

In Section 4.6: Description of Likelihood of hazards, the risk assessment outlines potential pollution incidents at ETS. For each potential pollution risk, there are a number of controls outlined. Some general controls which are in place to reduce the likelihood of pollution incident occurring include:

- Risk Assessments on Work Tasks
- SDS Documentation
- Work Procedures
- Incident and Hazard Management
- Inspections and workplace audits
- ISO 14001 Environment Management Audits
- ISO 9001 Quality
- AS/NZS 4801 Safety Standard
- Emergency Management
- Site Integrated Management Plans;
- Regular inspections and Maintenance;
- External Land Studies
- External Dangerous Goods Reports
- Correct storage and waste management; and
- Training

The site will make all attempts to ensure pollution incidents do not occur.

The site makes all attempts to prevent pollution incidents; but in a situation where a pollution incident is imminent and may potentially cause detrimental impacts to human health or the environment, the site will contact the necessary stakeholders (employees, contractors, neighbours, Regulatory Authorities) to provide as much early warning as possible.

##### **4.14.2 Actions During a Pollution Incident**

If an evacuation is required, this shall be completed in accordance with Section 13 Minimising harm to persons on the premises. In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site Evacuation Procedure. All staff are informed on the location of muster locations through site inductions, signage and ongoing training.

Licensees are required to report pollution incidents **'immediately'** (without delay) to the Relevant Regulatory Authorities as stated in Section 6.

In the event of a pollution incident, the person which has identified the incident should immediately contact the ETS General Manager. The person reporting the pollution incident should provide the following key details:

- Their name and contact details;
- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency; and
- Details of any assistance required.

Some general controls for managing a pollution incident include:

- Visually assess the situation. Undertake emergency response if required;
- If safety to do so, contain the spill using the spill kit material;

- Contact the appropriate regulatory authorities in accordance with the PIRMP;
- If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident;
- Take direction from the Appropriate Regulatory Authorities as required; and
- If required seek assistance from specialist consultants/contractors.

#### 4.14.3 Actions Post a Pollution Incident

A detailed incident investigation and report will be completed regarding the Pollution Incident to find the root cause of the incident and implement the corrective actions to prevent the incident occurring. The incident will be reported in the SCRIM Incident Management system.

If ETS are notified of the pollution incident by the public, a complaint will be registered in the SCRIM Incident Management reporting system.

Within a month following the incident, the PIRMP will be reviewed and tested. ETS will continue to liaise with the relevant Regulatory Authorities to reduce the likelihood of the pollution incident occurring.

The Incident will be discussed at the toolbox meeting forum with all staff and contractors regarding the incident investigation, key outcomes and follow up on the completing of the corrective actions.

#### 4.15 Coordinating with persons

##### 4.15.1 Coordinating With Authorities

Licencees must notify all of the appropriate Regulatory Authorities about the incident. These include:

- Environment Protection Authority (EPA);
- Ministry of Health;
- Safe Work NSW;
- Local Council; and
- Fire and Rescue NSW

Refer to Section 4.3: Notification to Relevant Authorities

Notifying Relevant Authorities	
Name of Person Responsible:	Michael Oxman
Position:	Site Manager
Business Hours Contact Number:	P. (02) 6368 4080 0417 657 597
After hours Contact Number:	0438 062 082
Email	Michaelo@envirotreat.com.au

**All Communications are to be Made:**

All Communications are to be made to the following:

Refer to Section 4.2 – Pollution Incident – Persons Responsible

<b>PIRMP Activation (Primary Contact)</b>	
Name of Person Responsible:	Michael Oxman
Position:	Site Manager
Business Hours Contact Number:	P. (02) 6368 4080 0417 657 597
After hours Contact Number:	0438 062 082
Email	Michaelo@envirotreat.com.au

<b>PIRMP Activation (Secondary Contact)</b>	
Name of Person Responsible:	Brad Williams
Position:	ETS General Manager
Business Hours Contact Number:	P. (02) 9603 3666 0429 655 325
After hours Contact Number:	0429 655 325
Email	Brad.williams@remondis.com.au

**4.16 Staff Training**

Staff will be trained in various aspects of the Health, Safety, Environment Management System and the PIRMP to create awareness and understanding.

The objective of the training program is to ensure all staff and contractors are aware of the key steps to manage a pollution incident including the right actions during and immediately after incident pollution along with eliminating pollution incidents.

Refer to the ETS Training Matrix detailing our training and schedule. The training includes:

- Emergency Management
- Fire Extinguisher Training
- First Aid Training
- Fire Warden Training
- Spill Kit Training
- Dangerous Goods Awareness Training
- PIRMP Training

Training will be completed in various forums:

- Toolbox Meetings
- Internal and External Training
- Certificate IV in Waste Management

A toolbox presentation outlining the key components of the PIRMP will be presented to all ETS Staff and Contractors.

#### 4.17 Testing and Updating of the PIRMP

##### PIRMP Testing

The PIRMP will be tested every 12 months as per the requirement. The testing of the PIRMP is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner.

Testing will involve undertaking desktop simulations of incidents and if necessary completing exercises or drills. Testing will need to cover all the components of the PIRMP, including the effectiveness of the training.

Plans must be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates to assess. In the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

PIRMP Testing will be reported in SCRIM .

Once the testing is completed, it is imperative that the PIRMP is reviewed and changes completed.

Date Tested	Tested By	Details of Test	Findings of Test including issues Identified	Next Scheduled Testing Date (within 12 months from current test)
24 August 2017	Michael Oxman	Fire Oxidiser Store		
8 December 2017	Michael Oxman	Material being mixed has caused an explosion		
25 March 2020	Michael Oxman –Site Supervisor	Desktop Review and redesign of the Pollution Risk Assessment	Outdated Training Matrix No detailed EPL Licence Details Site Manifest updated Update of ETS Contacts Additional Actions to minimise pollution	25 March 2021

##### PIRMP Update Details

Date Update Occurred	Reason for Update	Details of Updates	Date the updated version completed	Date of completion
25 March 2020	Review of EPA PIRMP Guidelines and template	Add Scope EPL Licence Details Formatting Review of Contacts Update of ETS Contacts Update of Risks	27 March 2020	27 March 2020



## **5.0 REFERENCES**

- Incident Management
- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations (General) Regulation 2009
- Environment Protection Licence 13230
- EPA's Guideline: Pollution Incident Response Management Plans
- ETS Training Matrix
- SCRIM Incident Management Reporting
- Pollution Risk Assessment

## **6.0 ATTACHMENTS**

- Nil