



Pollution Incident Response Management Plan

Environmental Protection Licence 20759

Prepared By

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1. Introduction

Shoalhaven Recycling is committed to ensuring all aspects of its operations comply with the environmental legislative requirements in NSW. This Pollution Incident Response Management Plan has been developed to ensure that if a pollution incident occurs in the course of our operations, all aspects of the environment that may be threatened are managed and rectified in accordance with environmental legislation. A hard copy of this plan shall be maintained at our Materials Recovery Facility and shall be implemented by the manager on duty if an incident occurs where harm, actual or potential, to the environment may occur.

2. Objectives

This Pollution Incident Response Management Plan (PIRMP), has been developed in accordance with the requirements of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulations 2012. Shoalhaven Recycling has developed a PIRMP to meet legislative requirements.

The objectives of the plan and the abridged version of the PIRMP are to:

- Ensure timely and comprehensive communication about a pollution incident on or off site to appropriate staff, the Environmental Protection Authority (EPA), other authorities as required and the those in the local community who may be affected by the impacts of the incident;
- Minimize and control the risk of a pollution incident at the facility or an offsite location by identifying environmental risks present and developing action plans to minimise and manage those risks; and
- Identify and train employees responsible for the implementation of the PIRMP and ensure the plan is regularly tested and modified where required to ensure its effectiveness.

3. Definition of a Pollution Incident

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.

A pollution incident is required to be notified if there is a risk of *material harm to the environment*, which is defined in section 147 of the *Protection of the Environment Operations Act* as:

- a) *Harm to the environment is material if:*
 - i) *It involves actual or potential harm to the health & safety of human beings or to the ecosystems that is not trivial, or*
 - ii) *It results in actual or loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such 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.*

4. Pollutant Inventory

All potential pollutants are recorded in *SHR-WHS-011A Dangerous Goods, Chemicals, and Hazardous Substances Register*, an internal register which is reviewed and updated periodically.

5. Communication with Neighbours and the Community

If an incident occurs the manager on duty shall ensure any neighbouring properties are be advised of the incident by telephoning the property owner as soon as practical and advising them of the incident details, including:

- relevant details of the incident;
- advice provided by the relevant authorities;
- any safety issues for humans, animals or plants; and
- details of preventative actions taken and details of avenues they should undertake to ensure their safety is not compromised.

The Shoalhaven Recycling website shall be updated to ensure the community located in the local area are made aware of the incident and are provided with controls needed to remain safe.

6. Testing

Testing of the Pollution Incident Management Response Plan shall be undertaken by the Production Manager on an annual basis by undertaking practical exercises or drills and documenting these on a toolbox talk form. If any anomalies are found in the plan, the Production Manager in consultation with the General Manager shall update and organise training for staff on an as needs basis. In the event of an incident, a complete review of the effectiveness of the Pollution Incident Management Response Plan shall be undertaken within one month.

7. Plan Availability

In accordance with Section 153D of the POEO Act, the plan is available to all site employees on the notice board in the Materials Recovery Facility and in the main office. This plan has also been placed on the Shoalhaven Recycling website for public access.

8. Incident Response Protocol

This section provides direction on the manner in which an incident should be managed, including the communication and on site emergency response actions for responding to an incident that has resulted in a material impact to human health or the environment. This document operates in conjunction with the following documents, available on the Shoalhaven Recycling intranet:

- SHR-WHS-006G Emergency Plan v1.0
- SHR-WHS-006 SOP - Emergency Preparedness & Response
- SHR-WHS-004A Fire & Smoke Emergencies
- SHR-WHS-006A SOP - Emergency Evacuation Diagrams
- SHR-WHS-006B SOP - Personal Emergency Evacuation Plan (PEEP)
- SHR-WHS-006D Register - Emergency Contact Details

8.1. Identification of a Reportable Pollution Incident

Any staff member, contractor or visitor who identifies the potential for or observes an actual pollution incident should assess the need for emergency services and act accordingly. Following this immediate assessment, the General Manager should be notified so as to allow for the correct identification of the incident as described in section 147 of the *Protection of the Environment Operations Act*.

8.2. Emergency Communications

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

8.3. Internal Communications

All incidents are to be reported immediately to the General Manager. All staff, contractors and visitors on site are to be advised and appropriate action taken to ensure their health and safety.

8.4. Regulator and External Agency Communications

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- EPA Environment Line 131 555
- Public Health Unit 1300 066 055
- WorkCover Authority 13 10 50
- Fire and Rescue NSW 1300 729 579

Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.

8.5. Local Community

Community stakeholders that are potentially affected by an incident will be notified immediately. As detailed in the emergency response procedure any incident is communicated to immediate neighbours. The communication method may change depending on the nature of the event or as directed by the relevant agency. Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts as well as on Shoalhaven Recycling's website.

8.6. On-Site Incident Management

An emergency response procedure is in place for the site. This procedure outlines the actions required to be taken when there is an incident on site which may result in a material impact to human health and/or the environment. This procedure and this plan will be used in-conjunction with each other to ensure that the impacts of pollution incidents are minimised as much possible through early intervention.