



R Oliver CONSULTING

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Sydney Recycling Park

PREPARED FOR SYDNEY RECYCLING PARK PTY LTD

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EXECUTIVE SUMMARY

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2022.

The Sydney Recycling Park site operates under a management system manual with standard operating procedures used to manage environmental issues on site. Under the legislation referred to above, EPL 12901 also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

1. Background –describes main features of the regulation
2. Hazard, likelihood and pre-emptive actions to prevent pollution incident risks – describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
3. Maps – map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. Emergency incident response procedures – what to do in case of material harm
5. Early warnings and communication to neighbours –when to contact neighbours in case of pollution incidents and info required for website
6. Training –information to be passed on to staff and contractors
7. Updating of plan –frequency of updates
8. Testing – frequency of drills to test effectiveness of PIRMP
9. Implementing of plan – reference to legislation requirement to carry out aspects of the plan during a pollution incident

THE SITE

The Sydney Recycling Park is licensed to extract, process and store 30000-50000 tonnes per year. This site is covered by an Environment Protection Licence (EPL) number 12901 for the scheduled activities of:

- Land-based extractive activity > 30000-50000 T extracted, processed or stored
- Non-thermal treatment of general waste > 0 T treated
- Waste disposal by application to land Any annual capacity
- Waste storage - other types of waste > 0 T stored

PURPOSE

The purpose of this PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community.

The purpose of this plan is to:

Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident

Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks

Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

SCOPE

This PIRMP is for the use of all SYDNEY RECYCLING PARK staff involved in the storing and processing of waste and extracted material on the Sydney Recycling Park site, including where incidents occur during contractors undertaking work. The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur.

The Sydney Recycling Park site is located on Clifton Ave Kemps Creek and holds EPL no. 12901. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of SYDNEY RECYCLING PARK staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the *POEO Act 1997* and the *POEO (General) Regulation 2022*.

RESPONSIBILITIES

All SYDNEY RECYCLING PARK staff and contractors are responsible for understanding and implementing this PIRMP as appropriately identified. The PIRMP identifies the general roles and responsibilities of SYDNEY RECYCLING PARK staff.

SYDNEY RECYCLING PARK Landfill Manager is responsible for:

- assisting with advice, reporting and response process;
- ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act;
- giving advice on whether environmental incidents need to be reported to external agencies;
- assisting in the notification of pollution incidents to the relevant authorities
- provision of maps associated with the plan;
- assistance with the implementation of response actions to pollution incidents
- assistance in communicating with neighbours and the local community about the Plan and when incidents of a certain nature occur;
- ensuring staff are aware of this plan and trained in its implementation;
- testing; and
- Reviewing this plan.

EVALUATION

The landfill manager records and monitors all environmental incidents on site. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the SYDNEY RECYCLING PARK Landfill Manager.

The Landfill Manager is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

ADDITIONAL INFORMATION

Contact: Landfill Manager 0456 665 055

Effective date: October 2024

Review date: See Updating of Plan

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

SYDNEY RECYCLING PARK, NEW SOUTH WALES

PREPARED FOR SYDNEY RECYCLING PARK PTY LTD

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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN **SYDNEY RECYCLING PARK, NEW SOUTH WALES** **PREPARED FOR SYDNEY RECYCLING PARK PTY LTD**

1. BACKGROUND

This Pollution incident Response Management Plan (the Plan) complies with the requirements under the:

- POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans
- POEO (General) Regulation 2022 Chapter 4

The requirements under the legislation are supported by the Environmental Guidelines: Preparation of pollution incident response management plans, which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licences (EPLs). The Sydney Recycling Park site operates under EPL no. 12901 and is therefore required to prepare a PIRMP and implement the PIRMP if an incident occurs. Key areas which this Plan covers are described in Table 1 PIRMP Requirements.

Table 1: PIRMP Requirements

PIRMP Legislation covered under this Plan		Reference
POEO Act Part 5.7		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	4 + references
153D	Keeping of plan:	5.3
153E	Testing of plan:	8
153F	Implementation of plan:	9
POEO (General) Regulation 2022		
72(a)	Hazard assessment:	2.4 +appendix 1
72(b)	Likelihood assessment:	2.4 +appendix 1
72(c)	Pre-Emptive Action:	2.4 + appendix 1
72(d)	Pollutant Inventory Types:	2.4 + appendix 1
72(e)	Pollutant Inventory Quantities:	2.4 + appendix 1
72(f)	Safety Equipment:	2.4 + appendix 1
72(g)	Staff Contacts:	4.1.1
72(h)	Authority Contact:	4.2 + references
72(i)	Early Warnings Neighbours:	2.4 & 5
72(j)	Staff Safety:	2.4
72(k)	Maps location of pollutants:	2.4 and 3
72(l)	Early Warnings General:	2.4 and 5
72(m)	Training of Staff:	6
72(n)	Timing of Testing:	8
72(o)	Updating of Plan:	7
72(p)	Plan Testing:	8

PIRMP Legislation covered under this Plan		Reference
74(1)	Availability of plan:	5.3
74(2)	Publishing Plan Parts:	5.2
74(3)	Procedures under Act:	4 + references
74(4)	Privacy Protection:	5.3
75(1)	Testing of the Plan:	8
75(2)	Minimum Testing requirements:	8

2. HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

2.1 OVERVIEW

This chapter deals with the POEO (General) Regulation 2022's sections 72(a) to 72(f) and partially covers s72(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The Sydney Recycling Park extracts and stores shale and clay and accepts waste for disposal to landfill and also stores waste for recycling.

The site also undertakes activities of waste processing for recycling. A sediment pond is located on site to capture any sediment during rain events. Leachate is collected, stored and treated in a leachate pond.

This Plan also considers both air and water based pollution incident impacts. Written procedures are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in waste storage and processing such as stockpile management, use and storage of hazardous chemicals and use and storage of non-hazardous chemicals. The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under site safety procedures.

Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids

2.2 SUMMARY OF POLLUTION TYPES

Waste storage and processing by its nature has a limited list of typical pollution types which require to be considered under the PIRMP. This list covers the main types found for the Sydney Recycling Park site.

Table 2: List of Typical Main Pollutants in Waste management activities.

Description	Comments
Air Based Emissions	
Dust	From stockpiles and waste processing. Dust is covered under this Plan and also SOP Dust Management and Monitoring Procedure.
Fire	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under SOP Emergency Response to Fire Incident, Emergency Information and Safety Incident Procedure.
Noise	Emitted by plant and equipment. Covered under site induction information. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour is generally not associated with this site.
Spill type emissions	
Fuel including diesel and petrol based fuels	For plant and equipment operations. Covered under: SYDNEY RECYCLING PARK -Management of bulk fuel SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register SYDNEY RECYCLING PARK –Spill Response flowchart SYDNEY RECYCLING PARK – Safety Incident Procedure
Lubricants and hydraulic oils	For plant and equipment operations. Covered under SYDNEY RECYCLING PARK -Management of bulk fuel

	SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register SYDNEY RECYCLING PARK –Spill Response flowchart SYDNEY RECYCLING PARK – Safety Incident Procedure
Herbicides	Control of weeds: Covered under SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register SYDNEY RECYCLING PARK –Spill Response flowchart SYDNEY RECYCLING PARK – Safety Incident Procedure
Other chemicals	For plant and equipment operations. Covered under SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register SYDNEY RECYCLING PARK –Spill Response flowchart SYDNEY RECYCLING PARK – Safety Incident Procedure
Aqueous wastes	Management of water and stormwater. Covered under: SYDNEY RECYCLING PARK -Stormwater management and monitoring SYDNEY RECYCLING PARK -Site operations during wet weather SYDNEY RECYCLING PARK -Leachate management SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers
E wastes	210504 SOP Managing Lead in E-Waste (Rev1) 210428 SOP E-Waste Processing Loading Unloading 210428 SOP E-Waste Processing and Recycling (Rev1) 210428 SOP Battery Handling and Recycling (Rev1) 1.5 - E-Waste Management Plan (Rev2)
Other Wastes	Storage of wastes and wastes containing chemicals: Covered under: SYDNEY RECYCLING PARK -Rejecting loads asbestos and non-permitted waste SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management

2.2.1 Use and Storage of Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous Chemicals — covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances

Hazardous chemicals are documented and itemized in accordance to the Workplace Health and Safety Regulation 2017. The specific hazardous and non-hazardous chemicals documents are identified in Table 3:

Table 3 Reference Documents to Inventory of Pollutants

Document Name	Relation to this Plan
SYDNEY RECYCLING PARK environment and safety SOPS	Provides: <ul style="list-style-type: none"> • Key contacts regarding OH&S issues and incidents • Hazardous chemicals register • Storage and handling requirements • Emergency procedures • Training and record keeping • Handling of hazardous materials and dangerous goods

2.3 RISK ASSESSMENT AND CONTROL MEASURES (PRE-EMPTIVE ACTIONS)

2.3.1 Identification of Risk Areas

Assessment analysis and control measures to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents:

- SYDNEY RECYCLING PARK EMS
- SYDNEY RECYCLING PARK – Occupational Health and Safety Management System

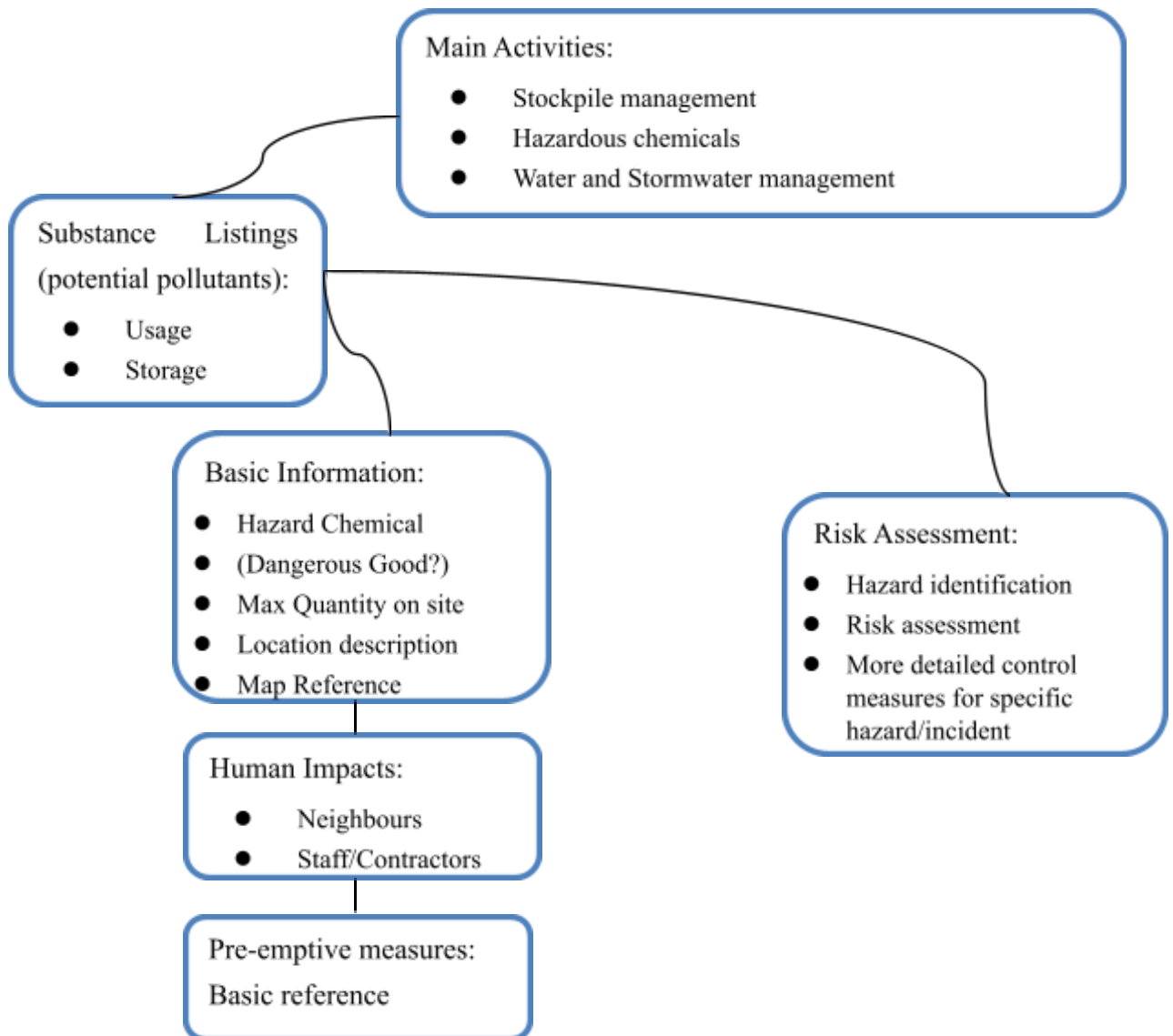
Table 4 List of Documents Covering Environmental Risk Assessment and Control Measures

Documents	
SYDNEY RECYCLING PARK Procedures relating to PIRMP requirements	SYDNEY RECYCLING PARK –Site Induction and record SYDNEY RECYCLING PARK –Dust Management and monitoring SYDNEY RECYCLING PARK –Emergency Response to fire incident SYDNEY RECYCLING PARK -Management of bulk fuel SYDNEY RECYCLING PARK –Spill Response flowchart SYDNEY RECYCLING PARK – Safety Incident Procedure SYDNEY RECYCLING PARK -Stormwater management and monitoring SYDNEY RECYCLING PARK -Site operations during wet weather SYDNEY RECYCLING PARK -Leachate management SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers SYDNEY RECYCLING PARK -Rejecting loads asbestos and non-permitted waste SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management – needs updating (add excavation of soil for spills) SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register SYDNEY RECYCLING PARK –General Site Environmental Management – needs updating SYDNEY RECYCLING PARK – General site operation

	<p> SYDNEY RECYCLING PARK –Job safety environmental analysis SYDNEY RECYCLING PARK –Personal Protective Equipment SYDNEY RECYCLING PARK –Site safety rules for drivers (landfills) SYDNEY RECYCLING PARK –Operation of tipping area SYDNEY RECYCLING PARK –Mobile Plant operation SYDNEY RECYCLING PARK –Emergency Information CES Air Quality Management and off-site sediment tracking mitigation Run Energy Flare operation and Maintenance manual 1.5 - E-Waste Management Plan (Rev2) </p>
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2.4 RISK MODULES

To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation are covered in this section. This is undertaken by a process described in the following flowchart:



In Appendix 1 Risk Assessment, each of the activities has their polluting substances listed. Each polluting substance is assessed for the requirements described in the flowchart above.

Table 5 provides a breakdown of the coverage of the regulatory requirements in the modules according to the *POEO (General) Regulation 2022* by section part.

Table 5: Risk Module Coverage of the POEO (General) Regulation 2022

Section	Item heading	Covered by
72(a)	Hazard assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
72(b)	Likelihood assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
72(c)	Pre-Emptive Action:	Hazard and Likelihood Risk assessment and Corrective Control Measures – Control measures and corrective action
72(d)	Pollutant Inventory Types:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Name/description, Covered under Hazardous Chemicals?
72(e)	Pollutant Inventory Quantities:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Amount Stored (maximum or estimated Maximums stored)
72(f)	Safety Equipment:	List Of Polluting Substance Storages/Uses At Site Initial Assessment- Ref to Safety Coverage
72(i)	Early Warnings Neighbours:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Need for early warnings to neighbours
72(j)	Staff Safety:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Ref to Safety Coverage
72(k)	Maps location of pollutants:	List Of Polluting Substance Storages/Uses At Site Initial Assessment Location of Storage, Map reference (supports section 4 Maps)

3. MAPS

This section covers the *POEO (General) Regulation s72(k)* requirements which are:

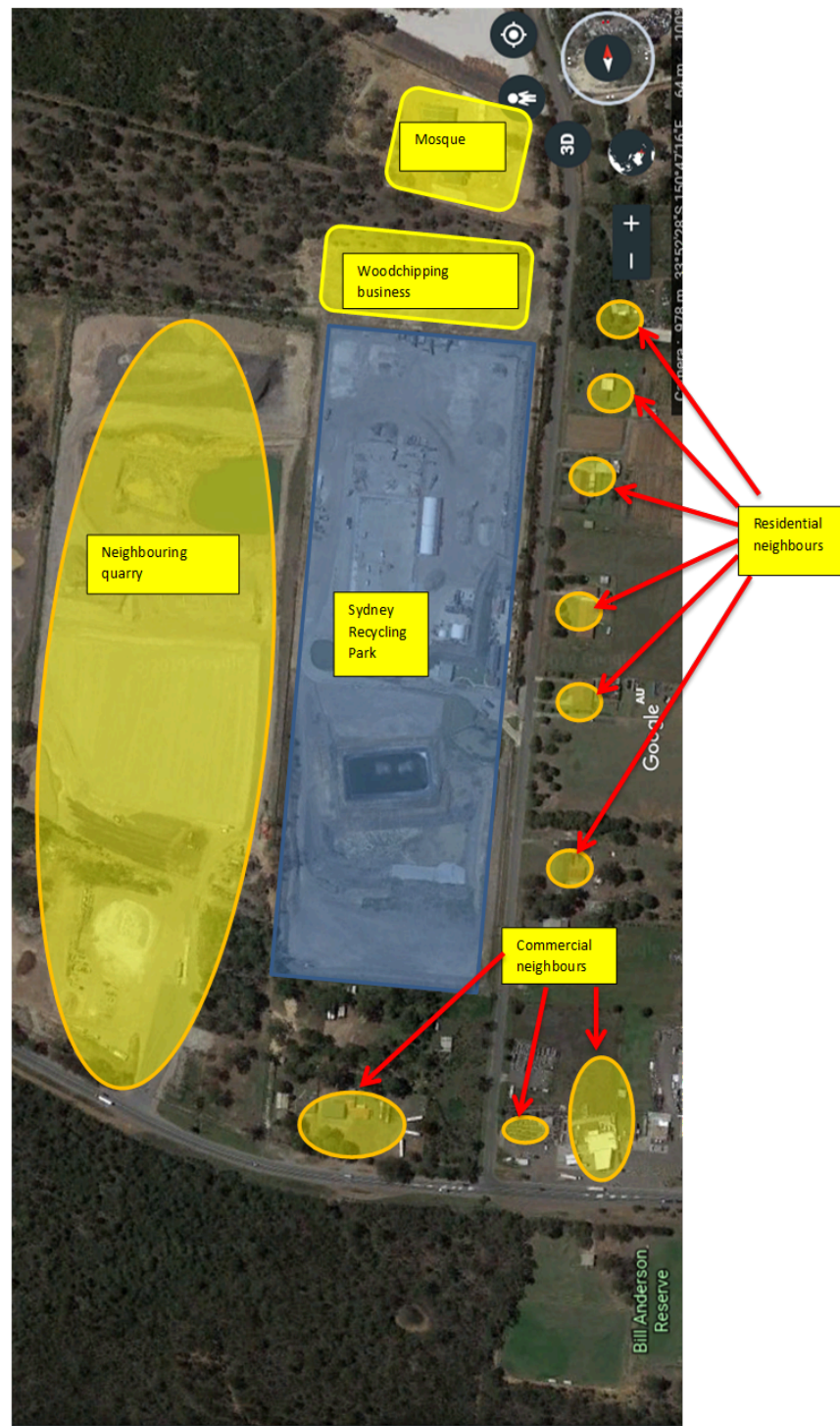
A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.

Map 3.1 below shows the geographic location of the Sydney Recycling Park Site and includes the requirements above.

3.1 SITE MAP FOR SYDNEY RECYCLING PARK SHOWING POLLUTANTS



3.2 MAP OF SYDNEY RECYCLING PARK SHOWING POTENTIALLY AFFECTED NEIGHBOURS



4. EMERGENCY INCIDENT RESPONSE PROCEDURES

4.1 INTERNAL COMMUNICATIONS — KEY NAMES AND CONTACTS

Internal Communications are outlined in the following documents:

- SYDNEY RECYCLING PARK –Emergency contacts
- SYDNEY RECYCLING PARK –Site induction and record
- SYDNEY RECYCLING PARK –Emergency response to fire incident
- SYDNEY RECYCLING PARK –Spill Response flowchart
- SYDNEY RECYCLING PARK – Safety Incident Procedure
- SYDNEY RECYCLING PARK – General site environmental management

Table 6 lists the responsible jobs

Table 6 Responsible Persons List and Contacts

Contact Person and Job title	Contact Number
Henare Rekate Landfill Manager	0456 665 055
Weighbridge operator	9826 1000

4.1.1 Action to be Taken Immediately after a Pollution Incident by License Holder and Occupier of the Premises

The Plan must be followed immediately after a pollution incident occurs causing or threatening material harm.

Follow where applicable:

- Section 4.2, 4.3, 4.4 of this plan
- SYDNEY RECYCLING PARK –Emergency response to fire incident
- SYDNEY RECYCLING PARK –Spill Response flowchart
- SYDNEY RECYCLING PARK –Dust Management and monitoring
- SYDNEY RECYCLING PARK –Wet weather site management
- SYDNEY RECYCLING PARK –Leachate management

4.1.2 Procedures to be followed by the Responsible Person notifying the Pollution

This is covered under:

- See section 4.5

4.1.3 Procedures to be followed for coordinating with the Authorities or Persons

This is covered under

- See section 4.2, 4.3 and 4.4

4.2 *PROCEDURE TO BE FOLLOWED FOR COMBATING THE POLLUTION CAUSED BY A SPILL INCIDENT*

This is covered under:

- SYDNEY RECYCLING PARK –Spill Response flowchart
- SYDNEY RECYCLING PARK –Wet weather site management
- SYDNEY RECYCLING PARK –Leachate management
- MSDS factsheets for materials

For incidents involving material harm, the fire brigade or Hazmat would combat the pollution caused by a spill incident and become the emergency controller.

4.2.1 Pollution incidents - Spills

A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.)

The POEO Act definition of a **pollution incident** is:

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.

4.2.2 Clean-up Action

All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently.

POEO Act definition of "**clean-up action**", in relation to a pollution incident, includes:

- (a) Action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
- (b) Ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
- (c) Preparing and carrying out a remedial plan of action.

It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

4.2.3 Spill Kits

Spill kits include a range of products and materials used to contain and absorb liquids. Some kits are designed for use on impervious surfaces (eg. bitumen, asphalt or concrete) whilst others are designed to contain and absorb liquids (mostly fuels and oils) in waterways. Spills onto bare or loose soil surfaces can usually be managed without having to use a spill kit.

Spill kits used by SYDNEY RECYCLING PARK would commonly be "General Purpose" or "Hydrocarbon" type spill kits, and would be capable of containing a spill of 80–90 litres.

4.2.4 Spill kit management

Spill kits should be available in areas where hazardous substances are used/stored and should be easily accessible.

Also

- Spill kits should be available on site and restocked/replaced if used.
- Spill kits should be available at:
 - o The main storage area or inside the mobile equipment
 - o Inside the fuel truck delivering fuel to the site

4.2.5 Personal Protective Equipment

Use appropriate PPE before getting near a chemical spill. PPE types to be used are identified on the MSDS.

For aqueous based spills, such as dam waters and materials from sediment basins or floods, general safety gear for site will be suitable.

4.2.6 Location of information

The Pollution Incident Response Management Plan will be located with other emergency documentation – namely in the site office

Use either site plans or visual inspection to identify stormwater or creeks and other sensitive environmental areas

4.2.7 Incident Action Hierarchy for Liquid and Flowable Solid Spills

This action should only be followed if there is no procedure or other requirement to follow in dealing with a spill type incident. For example, the procedure for managing stormwater is covered under SYDNEY RECYCLING PARK -Site operations during wet weather and also Stormwater management and monitoring. The main site emergency plan should be followed where required.

It or its alternative should be implemented in conjunction with the safety incident procedure for internal recording of incidents.

When a spill occurs, it is the duty of the employee/contractor who notices or creates the spill to:

- Raise the alarm that an incident has occurred (see site induction information)
- If you are the Emergency Controller take over command of the clean-up unless replaced (see section 4.7)
- If not the Emergency Controller then follow their instructions
- Invoke the following actions in the table below.

Incidents from liquids and flowable solids - generic procedure – use only when site specific procedure does not exist		
Main Action	Detailed Actions	Comments / information
Safety Check	Ensure personal safety - Occupational Health & Safety rules apply at all times. Refer to the MSDS for correct PPE or use standard PPE for the site for non-hazardous materials e.g. waters and muddy waters	Do not put yourself or any other person in danger when containing or cleaning up a spill. This is to prevent harm to humans. If anyone is injured or requires rescue they must be attended to first. Weighbridge can assist with location of MSDS.
	If the material leaking is a flammable liquid ensure that ignitions sources are isolated or removed from the area.	Typical examples would be paints and thinners used for maintenance or other purposes. Class 3 flammables are not generally used on site.
	If the material is on fire or undergoing a dangerous reaction, invoke fire fighting procedures.	Refer to the SYDNEY RECYCLING PARK-Response to Fire Incident
	Reporting requirements: All incidents must be immediately reported to the landfill manager	This is covered in site induction
Stop the leak	Do not allow any material down Stormwater drains	This to prevent and minimise harm to the environment
	Where safe to do so minimise further leakage by turning off valves or the machine, plugging leaks with bungs etc.	Stopping the leak or source of the pollution will minimise its impacts
	Do not flush stormwater drains with water unless authorised by the controlling agency e.g. Fire Brigade or EPA	Further runoff from the site will cause additional pollution. Only the EPA and Fire Brigades can make this decision.
	If the leak or spilt material is likely to go off-site and the incident is of such a scale consider notifying neighbours which may be affected.	This is covered in section 2.4 and 4.5
Contain the leak	Contain material to small area	Limiting the spread of the material will minimise harm to the environment
	Depending on the size of the spill: Quick construction of barriers or earth mounds, bunds and dams, sandbags and spill kits socks/pillows or absorbent materials to minimise spread of liquids and flowable solids	For large spills consider use of earthmoving equipment to quickly construct bunds and dams downstream to contain the spill. Smaller spills use spill kits. Note use socks/pillows to absorb oils on water surfaces.
	Take into account the topography of the site to plan location of barriers and dams to prevent spreading of the spill.	Refer to the plan of stormwater drains/drainage topography to locate water courses

Incidents from liquids and flowable solids - generic procedure – use only when site specific procedure does not exist		
Main Action	Detailed Actions	Comments / information
	Prevent it from spreading any further by using the sausages (from the spill kit) to form a bund on the ground. Tie as many sausages together as needed to create a continuous barrier	On non-impervious surfaces use spill kit socks (or sandbags or similar) to form a bund downhill from the spill to stop it spreading; place spill kit pillows under leaks; broadcast absorbent material over the spill and work towards the centre of the spilled material with a stiff bristle broom.
Clean up	Clean up the spill Follow the method in the MSDS	This may involve organising the pump out of liquids by a waste contractor or transfer of liquids into drums or elsewhere.
	Mop up the spill with the Pads (from the spill kit) or spread liquid absorbent material over the spill.	Spill kits should be used in combination. Place contaminated spill kit materials in a suitable bin or drum (e.g. 200l)
	Shovel up or excavate contaminated soil	Place in a suitable drums or if large volume a special banded stockpile
	Spills on water: Deploy boom on downstream side of spill. Consider wind direction and current or tidal flows. Slowly pull the boom around the spill and then draw it back into a small area.	Position hydrophobic absorbent pads or hydrophobic granular material over the surface of the spill contained by the floating boom.
Waste management	For small spills: Place contaminated booms and pads in a 200 L drum or similar container and remove from site to an authorized waste disposal facility.	Waste storage should be referred to Landfill Manager for advice. Aim for waste materials to be transported off site quickly
	Containers and drums which contain spilt materials to be stored temporarily until collected for waste disposal	Storage of waste drums may require bunds or other spill capture systems
Report	Complete an Incident Report as per SYDNEY RECYCLING PARK safety incident reporting	SYDNEY RECYCLING PARK requires all incidents to be reported in written form for internal and regulatory requirements.

4.3 PROCEDURE TO BE FOLLOWED FOR FOLLOWING AN AIR INCIDENT

4.3.1 Pollution incidents – Air Emissions

An air emission can include, smoke, dust, odour or emission of a chemical or air impurity.

This action should only be followed if there is no procedure or other requirement to follow in dealing with an air emission type incident. For example, the procedure for dust management and monitoring.

It or its alternative should be implemented in conjunction with the Incident reporting procedure.

Incidents from Air Based Emissions generic procedure – use only when site specific procedure does not exist		
Emission	Action	Comments / Information
Dust	If dust is of such a scale it will impact on neighbours or represents a risk to neighbours consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice	Generally observable or complaints based. The western boundary of the site is surrounded by a litter fence which mitigates dust blowing off site.
Fire	Depends on size and type of fire. Follow emergency plan for fires If smoke represents a risk to neighbours consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice. Co-ordinate with combat agencies to inform neighbours.	Smoke is the main air emission of concern. Large fires threatening homes and property may trigger evacuation procedures with neighbours See SYDNEY RECYCLING PARK -emergency response to fire incident.
Odour	Odour is generally not associated with the site. Neighbours who identify themselves when lodging a complaint will be followed up by the landfill manager.	Note odour is not a pollution Incident unless it is consider an air pollutant.
Noise	Neighbours who identify themselves when lodging a complaint will be followed up by the landfill manager	Note noise is not a pollution Incident under the POEO Act.

4.4 EXTERNAL COMMUNICATIONS – GOVERNMENT AGENCIES AND OTHER PARTIES

This is covered under:

- SYDNEY RECYCLING PARK -Induction information
- SYDNEY RECYCLING PARK – Emergency information

4.4.1 Coordinating With Authorities

POEO Act s153C States in relation to the contents of a PIRMP:

(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.

This action should only be followed if there is no procedure or other requirement to follow in dealing with a pollution incident.

The below actions in s4.4.2 and s4.4.3, or its alternatives, to be implemented in conjunction with site SOPs.

4.4.2 Site Control – Incident Response

Emergency contact details are listed in the SYDNEY RECYCLING PARK -Emergency information.

To cover the requirements of this plan a generic procedure for site control and communications internally and with the appropriate government agencies, neighbours and other stakeholders appears below.

4.4.3 Generic Procedure for Site Control and Communications

After the incident has been immediately reported, a site controller must be appointed. The Site Controller function is to coordinate the spill response actions in this procedure including co-coordinating reporting internally to the relevant authorities and any affected neighbours.

Having a site Controller is a requirement under Fire and Rescue's Emergency Response Plan requirements if the site stores more than the manifest quantities of dangerous goods. This is triggered if more than 2,500 l of Class 3 flammable liquids (eg petrol, paints etc.) are stored on site.

Having a site controller provides for a chain of command at an incident where one person can take charge of the clean-up of the incident and hand over control to other Site Controllers as more capable staff arrives. The Site Controller will also hand over control to:

- More capable SYDNEY RECYCLING PARK staff as appointed by the SYDNEY RECYCLING PARK Landfill Manager
- The appropriate combat agency, (i.e. Fire and Rescue, EPA etc.) once they attend the incident scene, as is likely for a material harm incident

The SYDNEY RECYCLING PARK Site Controller's responsibility will, after arrival of the combat agency, assist them by:

Providing advice on the incident and its details (i.e. type of spill, chemicals involved, quantities involved and actions undertaken and in progress)

Enabling equipment, plant and materials to be available to the combat agency's use in assisting of making the incident safe and minimising harm to the environment

Once an incident has occurred and been reported, the following Table 6 – Process for Site Controller for co-ordinating, with the authorities - represents the responsibilities and who becomes the main emergency controller of the incident.

Table 6 – Process for Site Controller for co-ordinating, with the authorities

Category 1 Reporting Response		SRP Management Actions	Contractor Management Actions
1.	For possible material harm POLLUTION INCIDENTS , immediately appoint an interim site controller. Landfill Manager will advise on choice of site controller. All Site Controllers are to consider advice provided and use this in decision making.	SYDNEY RECYCLING PARK Landfill Manager to appoint interim site controller.	SYDNEY RECYCLING PARK contractor to appoint interim site controller who is at the scene, to be handed over to a SYDNEY RECYCLING PARK site controller. Contractor to provide advice.
2	Arrival of more senior SYDNEY RECYCLING PARK Site Controller	Interim Site controller to hand over to SYDNEY RECYCLING PARK Site Controller and provide advice.	Contractor to follow instructions from SYDNEY RECYCLING PARK site controller and provide advice.
3.	Arrival of a combat agency – Fire and Rescue, EPA or SafeWork. Combat agencies to make clear who their Site Controller is. (A reported pollution incident will generally result in a combat agency arriving)	Site Controller to hand over to Combat agency Site Controller, assist provide advice and follow instructions.	Site Controller to hand over to Combat agency Site Controller assist provide advice and follow instructions.
4.	Advice to combat agency	Advice can include maps and equipment which is at hand which may assist in combating the incident.	Advice can include maps and equipment which is at hand which may assist in combating the incident.

4.4.4 Evacuation

For large dangerous incidents such as large bush fires or major flooding the Site Controller may consider evacuation of staff to appropriate distances away from the incident. If an Emergency Plan has been developed, this plan will provide appropriate distances and or locations of evacuation areas.

4.5 *PROCEDURES FOR NOTIFYING POLLUTION INCIDENT TO EPA, LOCAL COUNCILS OR RELEVANT AUTHORITIES*

This is covered below:

Relevant authorities' notification order	
If there is an immediate threat to human health or the environment:	
call Fire and Rescue first	000
EPA	131 555
Ministry of Health (Nepean)	02 4734 2022
SafeWork	131 050
Local Authority (Penrith city council)	02 4732 7777
Ask for environmental health or after hours leave a message	
If there is not an immediate threat to human health or the environment:	
call EPA first	131 555
Local Authority (Penrith city council) –	02 4732 7777
Ask for environmental health or after hours leave a message	
Ministry of Health (Nepean)	02 4734 2022
SafeWork	131 050
Fire and Rescue	1300 729 579

5. EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

5.1 COMMUNITY COMMUNICATION AND CONSULTATION

SYDNEY RECYCLING PARK has and would continue to undertake community and stakeholder consultation where necessary.

An assessment of the typical pollution incident types has been undertaken in chapters 2 and 4. This resulted in the early warning actions located in Table 7 below.

Table 7 List of Typical Main Pollutants and Potential Neighbour Impacts and Early Warnings

Air Based Emissions		
Description	Potential Risks	Early Warning actions
Dust	Air quality issues Loss of amenity Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to close windows and doors and stay inside until further notice
Fire	Air quality issues	In extreme cases contact neighbours via doorknock process or phone calls and ask them to close windows and doors and stay inside until further notice. For larger fires, coordinate with combat agencies.
Noise	Loss of amenity	Not required under PIRMP. Communicate with neighbours on as needs basis.
Odour	Air quality issues Loss of amenity Community Complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to close windows and doors and stay inside until further notice
Spill type emissions		
Fuel including diesel and petrol based fuels	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.

Lubricants and hydraulic oils	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice
Herbicides	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Other chemicals	Water quality issues if spill enters waterway or travels to neighbours land Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice
Soils and erosion	Water quality issues if spill enters waterway or travels to neighbours land Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice
Contaminated materials uncovered	Water quality issues if spill enters waterway or travels to neighbours land Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice
E wastes	Water quality issues if spill enters waterway or travels to neighbours land Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice
Wastes	Water quality issues if spill enters waterway or travels to neighbours land Community complaints	In extreme cases contact neighbours via doorknock process or phone calls and ask them to avoid use of the water until further notice

5.2 WEBSITE INFORMATION

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2022 s74*:

(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:

(a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan,

(b) if the person does not have such a website--by providing a copy of the PIRM plan, without charge, to any person who makes a written request for a copy.

3) Subsection (2) applies only in relation to that part of a PIRM plan that includes the information required under:

(a) the Act, section 153C(a), and

(b) this Regulation, section 72(h) and (i) or 73(b)(ii) and (iii).

Below is a recommended layout of what should be published on the SYDNEY RECYCLING PARK website with a link to it in a prominent position.

For the above pollution incidents, the SYDNEY RECYCLING PARK Landfill Manager will be responsible for reporting to the authorities below without delay.

Relevant authorities' notification order**If there is an immediate threat to human health or the environment:**

call Fire and Rescue first	000
EPA	131 555
Ministry of Health (Nepean)	02 4737 2022
SafeWork	131 050
Local Authority (Penrith city council) –	02 4732 7777
Ask for environmental health or after hours leave a message	

If there is not an immediate threat to human health or the environment:

call EPA first	131 555
Local Authority (Penrith city council) –	02 4732 7777
Ask for environmental health or after hours leave a message	
Ministry of Health (Nepean)	02 4734 2022
SafeWork	131 050
Fire and Rescue	1300 729 579

Site Environmental contact number (Landfill Manager) 0456 665 055

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process or phone calls. The Landfill Manager or nominee will be responsible for coordinating the communication process.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice. This could be the case with groundwater contamination or water run off onto neighbouring property.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.

5.2.1 Emergency Incident Response Procedures

Under *Part 5.7 of the POEO Act*, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions) or property damage of an amount over \$10,000.

5.3 AVAILABILITY AND LOCATION OF THIS PLAN

The *POEO (General) Regulation 2022 s74(1)* states:

(1) A plan is to be made readily available:

- (a) to an authorised officer on request, and*
- (b) to a person who is responsible for implementing the PIRM plan at the premises—*
 - (i) to which the relevant licence relates, or*
 - (ii) where the activity takes place.*

The availability of this Plan will be made available by locating printed copies in the same locations as the Environment Protection Licence (EPL) is located – namely in the site office.

Unlike the EPL, this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2022 s74(3) which States

4) Personal information, within the meaning of the [Privacy and Personal Information Protection Act 1998](#), is not required to be included in a PIRM plan made available to a person other than an authorised officer.

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information

removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

6. TRAINING – SUMMARY AND REFERENCE TO PROJECT PROCEDURE

Training of SYDNEY RECYCLING PARK staff falls into several categories:

- Formal External Training - Training provided by external accredited providers.
- Formal Internal Training - Technical training registered with Training Operations and provided internally by the SYDNEY RECYCLING PARK Landfill Manager
- Information Sessions Training usually provided by internal staff.
- Site Training Information provided on site such as inductions and toolbox talks. Documents including procedures and plans may be used in such training. The training may be delivered by the landfill manager or nominee.

To also satisfy the requirements under this PIRMP the training is to also include:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents e.g. pump out of sedimentation ponds.

7. UPDATING OF PLAN

Effective date: July 2017

Review date This Plan will be updated according to the following:

- 12 months from the last update; or
- Within one month of a Category 1 Incident; or
- As identified after testing of the Plan (see section 8).

8. TESTING

The POEO (General) Regulation 2022 75 states for testing of the Plan:

- (1) A PIRM plan must be tested—*
 - (a) routinely at least once every 12 months, and*
 - (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.*
- (2) The test must be carried out in a way to ensure the following—*
 - (a) the information included in the PIRM plan is accurate and up to date,*
 - (b) the PIRM plan is capable of being implemented in a workable and effective way.*
- (3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.*

Where practical, testing of the Plan will be integrated into other emergency and incident testing and training programs.

Initial testing of the plan will be undertaken within 6 months of the acceptance of the PIRMP. Design of the testing will be undertaken 1 month before the testing is conducted.

Records of the testing will be kept by the SYDNEY RECYCLING PARK Landfill Manager.

8.1 TESTING DATES

This Plan will be updated according to the following:

- Design of the testing method will be 1 month before the initial test date
- 12 months from the last update, or
- Or before one month after a Category 1 Incident.

8.1.1 Recording of Testing

A detailed record of the testing of the Plan will be prepared after each testing of the plan is undertaken. If the test identifies any shortcomings in the Plan, especially the implementation of the spill response procedures, the Plan will be corrected or appropriate non-conformance actions will be undertaken.

The plan was tested on 25th May 2015 by Raelene Oliver and SRP employees by imitating a freak wind storm that threatened to blow material from the site to the neighbours. The neighbours were involved in the drill. Follow up actions from the drill were identified and reported.

The plan was tested on 15th June 2016 by mimicking the inadvertent dumping of radioactive waste on site. It was tested again on 26th July 2017 by Raelene Oliver and SRP employees by doing a mock spill drill of sodium hypochlorite.

The plan was tested on 20th July 2018 by Raelene Oliver (consultant), Leslie Welsh, John Tolomea and Elliot Tipping. The drill was a leaking diesel tanker and the 5 agencies were called.

The plan was tested on 13th September 2019 by Raelene Oliver and SRP employees after predicting a strong westerly wind that potentially could impact on neighbours.

The plan was tested on 25th September 2020 by Raelene Oliver and SRP employees where a radioactive waste specimen was found on site and employees had to enact what they would do if radioactive waste was inadvertently dumped on site.

The plan was tested on 11th October 2021 by Raelene Oliver and SRP employees where a lead acid battery was found to be leaking acid. Employees had to decide if the incident was material harm and how they would manage the spill.

The plan was tested on 4th November 2022 by Raelene Oliver and SRP employees where a diesel tanker was found leaking diesel from an opened valve and the driver has disappeared. The Due Diligence video of an incident was also played to staff.

The plan was tested on 18th October 2023 by Raelene Oliver together with SRP employees for a freak weather event with significant westerly winds.

The plan was tested on 9th October 2024 where radioactive waste (labelled with radioactive sign) was noticed in the electronic waste storage area. The testing was carried out by Raelene Oliver together with SRP employees.

9. IMPLEMENTATION OF THE PLAN

The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs. \$2 million maximum fines apply for failing to implement the Plan.

Hence if a pollution incident occurs:

- It must be responded to according to this Plan and its reference documents;
- An incident response report/audit must be completed.

APPENDIX 1

1. RISK MODULES

This Plan uses a risk assessment process to demonstrate the existing risk control methods are effective in preventing and minimising environmental harm from pollution incidents. If unacceptable risks are identified new control measures will be introduced. The modular format permits the use of common activities associated with landfilling to be used in future PIRMP documents.

The modules used for this Plan for the Sydney Recycling Park site include:

- Stockpile management
- Water and Stormwater management
- Hazardous chemicals

Each module uses a standard risk matrix used by SYDNEY RECYCLING PARK as per below.

Each module lists the type of use or storage for the pollutant/s being considered.

Each of the above is considered for a range of hazards and their control method considered. Also considered in the above process is:

- Impact on neighbours
- Safety
- Location
- If the pollutant is a hazardous chemical

1.1 SYDNEY RECYCLING PARK STANDARD OPERATING PROCEDURES (SOPs)

SYDNEY RECYCLING PARK have SOPs which provide procedural guidance on many environmental and health and safety issues. Table A1 is a list of these procedures which are referred to under this Plan. Note these will also be updated from time to time to improve their effectiveness and reflect changes to appropriate regulations.

Table A1 – List of SYDNEY RECYCLING PARK SOPs
SYDNEY RECYCLING PARK –Site Induction and record
SYDNEY RECYCLING PARK –Dust Management and monitoring
SYDNEY RECYCLING PARK –Emergency Response to fire incident
SYDNEY RECYCLING PARK -Management of bulk fuel
SYDNEY RECYCLING PARK –Spill Response flowchart
SYDNEY RECYCLING PARK – Safety Incident Procedure
SYDNEY RECYCLING PARK -Stormwater management and monitoring
SYDNEY RECYCLING PARK -Site operations during wet weather
SYDNEY RECYCLING PARK -Leachate management
SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers
SYDNEY RECYCLING PARK -Rejecting loads asbestos and non-permitted waste
SYDNEY RECYCLING PARK -Dangerous goods and hazardous substances management
SYDNEY RECYCLING PARK –Dangerous and Hazardous goods register
SYDNEY RECYCLING PARK –General Site Environmental Management
SYDNEY RECYCLING PARK – General site operation
SYDNEY RECYCLING PARK –Job safety environmental analysis
SYDNEY RECYCLING PARK –Personal Protective Equipment
SYDNEY RECYCLING PARK –Site safety rules for drivers (landfills)
SYDNEY RECYCLING PARK –Operation of tipping area
SYDNEY RECYCLING PARK –Mobile Plant operation
SYDNEY RECYCLING PARK –Emergency Information
CES Air Quality Management and off-site sediment tracking mitigation
Run Energy Flare operation and Maintenance manual
1.5 - E-Waste Management Plan (Rev2)

1.2 RISK MATRIX

Environmental risks associated with this plan use the following table A.

Table A: SYDNEY RECYCLING PARK Environmental Risk Matrix

Hazard	Likelihood		
	Very likely	Possible	Unlikely
Substance will leave the site, not possible to contain it (eg via stormwater drain, through the soil)	High Risk	High Risk	Medium Risk
Substance may be contained if noticed in time	High Risk	Medium Risk	Low Risk
Substance can be prevented from leaving the site	Medium Risk	Low Risk	Low Risk

Legend:

Substance will leave the site.....High (H)

Substance may be contained.....Medium (M)

Substance can be prevented.....low (L)

Very likely.....V

Possible.....P

Unlikely.....U

The hazards, likelihood and pre-emptive measures assessments which follow use table A in assessing the environmental risks associated with the hazards identified.

2. STOCKPILE MANAGEMENT

2.1 PURPOSE

This risk module forms part of the PIRMP for the Sydney Recycling Park storage and processing site. The activities associated with this module are related only to stockpile management.

2.2 ACTIVITIES

Stockpile management involves:

- Stockpiling of Shale
- Stockpiling of General Solid Waste

This risk module describes the main hazards to human health or the environment associated with stockpiling. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in section 4 of this plan. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 5 of this document are to be initiated.

The module has been written to cover general environmental hazards and their controls.

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager		Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
CHEMICALS (raw materials and products which can cause pollution)								
Oils and fuel from vehicles	Yes	variable	variable	variable	no	–Site Induction and record –Spill Response flowchart –Mobile Plant operation -Dangerous goods and hazardous substances management	–Site safety rules for drivers (landfills) –Site Induction and record	4
MATERIALS (eg stockpiles, silos, bulk solids etc.)								
20mm Aggregate	no	Variable – up to 3000 m ³	N/A at time of writing	Map 3.1	Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring	–Site safety rules for drivers (landfills)	2

¹ Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park				Responsible person: Landfill Manager			Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
						–General Site Environmental Management – General site operation	–Site Induction and record	
10mm aggregate		Variable – up to 3000 m ³	N/A at time of writing		Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation	–Site safety rules for drivers (landfills) –Site Induction and record	2
Recycled bedding sand		Variable – up to 3000 m ³	N/A at time of writing		Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation	–Site safety rules for drivers (landfills) –Site Induction and record	2

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park				Responsible person: Landfill Manager			Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
Recycled aggregate DGB 20		Variable – up to 3000 m ³	N/A at time of writing		Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation	–Site safety rules for drivers (landfills) –Site Induction and record	2
Wood or garden waste		Variable – up to 3000 m ³	N/A at time of writing		Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation	–Site safety rules for drivers (landfills) –Site Induction and record	2
Brown or pink shale		Variable – up to 40000 m ³	See map 3.1	Map 3.1	Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management	–Site safety rules for drivers (landfills) –Site Induction and record	2

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park				Responsible person: Landfill Manager			Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
						– General site operation		
Blue shale		Variable – up to 80000 m ³	See map 3.1	Map 3.1	Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation	–Site safety rules for drivers (landfills) –Site Induction and record	2
General solid waste stockpile		Variable – up to 15000 m ³	See map 3.1	Map 3.1	Only in extreme wind where dust threatens to impact on neighbours	–Dust Management and monitoring –General Site Environmental Management – General site operation –Operation of tipping area	–Site safety rules for drivers (landfills) –Site Induction and record	2

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park				Responsible person: Landfill Manager			Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
Current landfill cells		Variable	See map 3.1	Map 3.1	Only in extreme wind where dust threatens to impact on neighbours	<ul style="list-style-type: none"> –Dust Management and monitoring –General Site Environmental Management – General site operation –Operation of tipping area 	<ul style="list-style-type: none"> –Site safety rules for drivers (landfills) –Site Induction and record 	5
Previously filled landfill cells			See map 3.1	Map 3.1	Only in extreme cases where groundwater is impacted and neighbours access groundwater			6
Mud	no	variable	variable	variable	no	<ul style="list-style-type: none"> –Site Induction and record -Air Quality Management and off site sediment tracking mitigation report 	<ul style="list-style-type: none"> –Site safety rules for drivers (landfills) –Site Induction and record 	3

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT - Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park				Responsible person: Landfill Manager			Date October 2024	
Name / description	Hazardous Chemicals	Max Amount stored	Location of storage	Map reference	Need for early warning ¹	Pre-emptive action procedures	Ref to safety coverage	Ref to Hazard and likelihood assessment
E waste	yes	variable	In shed and next to shed	Map 3.1	Only if wastes enter waterway	E waste management manual and procedures	–Site Induction and record	
SUBSTANCES IN PROCESSES (substances which could be emitted)								
Wastes not accepted	Any asbestos waste or hazardous waste identified in incoming material	variable	variable	variable	If asbestos is found and fibres enter waterway or become airborne and threaten to impact on community. Any other hazardous waste that could harm community.	SYDNEY RECYCLING PARK –rejecting loads asbestos and non-permitted waste. Emergency procedure	–Site safety rules for drivers (landfills) –Site Induction and record	3, 1

Hazard and Likely hood Risk assessment and Corrective Control Measures – Stockpile Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
1.Noxious weeds	Improper disposal of noxious weeds causing contamination of land	M	U	L	Negligible.	1. SYDNEY RECYCLING PARK -Rejecting loads asbestos and non-permitted waste 2. Staff training and induction	Landfill Manager	
2. Stockpiling of shale, aggregate and general solid waste	Dust from roads inside site	L	U	L	Unlikely but possible	1. SYDNEY RECYCLING PARK –Dust Management and monitoring 2. Staff training and induction 3. Air Quality Management and off site sediment tracking mitigation report	Landfill Manager	

	Dust from stockpiles	M	V	H	possible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Dust Management and monitoring 2. Staff training and induction 3. Air Quality Management and off site sediment tracking mitigation report 	Landfill Manager	
	Stockpile spreading past site boundary	L	U	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –General Site Environmental Management 2. SYDNEY RECYCLING PARK – General site operation 3. Staff training and induction 	Landfill Manager	
	Stockpile size exceeding EPA licence maximum storage amount	M	V	H	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –General Site Environmental Management 2. SYDNEY RECYCLING PARK – General site operation 3. Staff training and induction 	Landfill Manager	
3.Rubbish and other	Improper disposal of waste causing contamination of land or water or air	L	P	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –rejected loads asbestos and non-permitted waste 2. Staff training and induction 3. Asbestos accepting trial in place from February 2019 4. Emergency procedure for radioactive or hazardous wastes 	Landfill Manager	
	Litter leaving site	M	P	M	possible	<ol style="list-style-type: none"> 1. Staff training and induction 2. Installation of litter fence 	Landfill Manager	
	Mud from vehicles being tracked onto outside roads	M	P	M	possible	<ol style="list-style-type: none"> 1. Staff training and induction 2. Air Quality Management and off site sediment tracking mitigation report 	Landfill Manager	
4.Plant and equipment leaks and spills	Spills onto ground causing contamination of land	M	P	M	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 	Landfill Manager	

	Spills onto ground causing contamination of groundwater	M	U	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL 	Landfill Manager	
5.storing of waste in currently used cells	Leachate causing contamination of ground	L	U	L	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers 4. Staff training and induction 	Landfill Manager	
	Leachate causing contamination of groundwater	L	U	L	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers 4. Staff training and induction 5. Groundwater monitoring as per EPL 	Landfill Manager	
	Generation of odour	M	U	L	negligible	<ol style="list-style-type: none"> 1. Staff training and induction 2. Putrescible wastes not accepted 3. Air Quality Management and off site sediment tracking mitigation report 	Landfill Manager	
	Generation of dust	M	U	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Dust Management and monitoring 2. Staff training and induction 3. Cell below ground level 4. Air Quality Management and off site sediment tracking mitigation report 	Landfill Manager	
	Fire from waste storage	M	P	M	possible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK – emergency response to fire incident 2. Staff training and induction 	Landfill Manager	

6.storing of waste in previously filled cells	Leachate contaminating ground	M	P	M	negligible	1. Groundwater monitoring as per EPL (this is only way of indicating if there is soil contamination)	Landfill Manager	
	Leachate contamination of groundwater	M	P	M	negligible	1. Groundwater monitoring as per EPL	Landfill Manager	
	Fire from waste storage	M	P	M	possible	1. SYDNEY RECYCLING PARK – emergency response to fire incident 2. Staff training and induction	Landfill Manager	
	Landfill gas generation	M	P	M	possible	1. Air Quality Management and off site sediment tracking mitigation report 2. Run Energy Flare Operation and maintenance manual	Landfill Manager	

3. WATER AND STORMWATER MANAGEMENT

3.1 PURPOSE

This risk module forms part of the PIRMP for Sydney Recycling Park. The activities associated with this module are related only to water and stormwater management.

3.2 ACTIVITIES

Water and Stormwater management involves:

- waste water discharge from dewatering, surface washing, washing vehicles and plant, and any other activities which add pollutants to water;
- prevention of mud and litter being deposited on trafficked roadways;
- maintenance of sediment control works;
- protection of soil and stockpiles from erosion by wind and rain;
- management of any sedimentation ponds
- management of landfill leachate
- management of stormwater

This risk module describes the main hazards to human health or the environment associated with water and stormwater management. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in section 4 of this plan. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 5 of this document are to be initiated.

The module has been written to cover general environmental hazards and their controls.

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Water and stormwater management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ²	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
MATERIALS (eg stockpiles, silos, bulk solids etc.)								
sediment	no	variable	variable	Map 3.1	no	-Site operations during wet weather -Stormwater management and monitoring	-Site safety rules for drivers (landfills) -Site Induction and record	1 and 2
AQUEOUS (eg dams, wastewater tanks, other water storage area)								
waste water discharge from washing vehicles and plant	no	variable	variable	Map 3.1	no		-Site safety rules for drivers (landfills) -Site Induction and record	1 and 2
Leachate pond	no	8ML	Leachate pond	Map 3.1	no	-Leachate management	-Site safety rules for drivers (landfills) -Site Induction and record	5
Sediment pond	no	1.2ML	Sediment pond	Map 3.1	no	-Site operations during wet weather	-Site safety rules for drivers (landfills)	1 and 2

² Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Water and stormwater management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager		Date: October 2024	
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ²	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
						-Stormwater management and monitoring	–Site Induction and record	
Temporary sediment pond	no	0.4ML	Temporary sediment pond	Map 3.1	no	-Site operations during wet weather -Stormwater management and monitoring	–Site safety rules for drivers (landfills) –Site Induction and record	1 and 2
wheelwash	no	variable	wheelwash	Map 3.1	no		–Site safety rules for drivers (landfills) –Site Induction and record	
SUBSTANCES IN PROCESSES (substances which could be emitted)								
rubbish and litter	Any asbestos waste or hazardous waste identified in incoming material	variable	variable	variable	If asbestos is found and fibres enter waterway or become airborne and threaten to impact on community	SYDNEY RECYCLING PARK –rejecting loads asbestos and non-permitted waste	–Site safety rules for drivers (landfills) –Site Induction and record	3

Hazard and Likelihood Risk assessment and Corrective Control Measures – Water and stormwater Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Pri ority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
1.Stormwater overflow from sediment basin	Extreme rain event causing overflow off site	M	P	M	possible	1. Proper design of silt pond 2. regular inspections 3. Staff induction and training 4. -Site operations during wet weather 5. -Stormwater management and monitoring	Landfill Manager	
	Overflow incident contained on site	M	P	M	no	1. Proper design of silt pond 2. regular inspections 3. Staff induction and training 4. -Site operations during wet weather 5. -Stormwater management and monitoring	Landfill Manager	
2.Untreated run off	Failure of erosion or sediment controls causing sediment laden material to leave site	M	P	M	possible	1. Proper design of silt pond 2. regular inspections 3. Staff induction and training 4. -Site operations during wet weather 5. -Stormwater management and monitoring	Landfill Manager	
	Failure of erosion or sediment controls but run off remains on site	L	P	L	negligible	1. Proper design of silt pond 2. regular inspections 3. Staff induction and training 4. -Site operations during wet weather	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Water and stormwater Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
						5. -Stormwater management and monitoring		
3.Rubbish and other	Improper disposal of waste causing contamination of land or water	L	U	L	Unlikely but possible	1. Remove and dispose in accordance with council regulations 2. Staff induction and training 3. SYDNEY RECYCLING PARK –rejecting loads asbestos and non-permitted waste	Landfill Manager	
4.Plant and equipment leaks and spills	Spills onto ground causing contamination of land	L	P	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction	Landfill Manager	
	Spills onto ground causing contamination of groundwater	L	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL	Landfill Manager	
5.leachate generation	Overflow of leachate pond	M	U	L	negligible	1. Remove and dispose in accordance with council regulations 2. Staff induction and training 3. SYDNEY RECYCLING PARK-efs-21 - (Waste disposal requirements) 4. Environment Incident Classification and reporting procedure and SYDNEY RECYCLING PARK-efs-20	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Water and stormwater Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
	Leak from leachate hoses	M	P	M	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers 4. Staff training and induction 5. Groundwater monitoring as per EPL 6. Spills flowchart 	Landfill Manager	
	Run off that is deemed as leachate causing ground contamination	M	P	M	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers 4. Staff training and induction 5. Groundwater monitoring as per EPL 6. Spills flowchart 	Landfill Manager	
	Odour generation from leachate storage and treatment	M	P	M	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. Staff training and induction 4. aerator in leachate pond 5. putrescible wastes not accepted 	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Water and stormwater Management Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Pri ority	Impact on neighbours	Control Measures Corrective Action		Responsible Person
	Water that has touched waste leaving the site via stormwater	H	V	H	negligible	<ol style="list-style-type: none"> 1. Leachate Management Plan CES July 2011 2. SYDNEY RECYCLING PARK -leachate management 3. SYDNEY RECYCLING PARK –Installation of leachate drainage lines and risers 4. Staff training and induction 5. Groundwater monitoring as per EPL 6. Spills flowchart 		Landfill Manager

4. HAZARDOUS CHEMICALS MANAGEMENT

4.1 PURPOSE

This risk module forms part of the PIRMP for Sydney Recycling Park. The activities associated with this module are related only to hazardous chemicals.

4.2 ACTIVITIES

Hazardous chemicals management involves:

- Mobile Equipment maintenance
- Fuelling of vehicles
- Storage of fuel
- Use of herbicide
- Use of compressed gases in hot work

This risk module describes the main hazards to human health or the environment associated with hazardous chemicals use. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in section 4 of this plan. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 5 of this document are to be initiated.

The module has been written to cover general environmental hazards and their controls.

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Hazardous chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ³	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
CHEMICALS (raw materials and products which can cause pollution)								
Hydraulic oil	Yes	205L x3	Oil and grease store	Map 3.1	no	–Site Induction and record –General Site Environmental Management – –Spill Response flowchart – Safety Incident Procedure -Dangerous goods and hazardous substances management –Dangerous and Hazardous goods register	-Site Induction and record -Personal Protective equipment	1
Engine oil	Yes	205L x3	Oil and grease store	Map 3.1	no	–Site Induction and record –General Site Environmental Management – –Spill Response flowchart – Safety Incident Procedure	-Site Induction and record -Personal Protective equipment	1

³ Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Hazardous chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ³	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
						-Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register		
Gear oil	Yes	205L x2	Oil and grease store	Map 3.1	no	-Site Induction and record -General Site Environmental Management – -Spill Response flowchart - Safety Incident Procedure -Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register	-Site Induction and record -Personal Protective equipment	1
Lubricating oil	Yes	20L x2	Oil and grease store	Map 3.1	no	-Site Induction and record -General Site Environmental Management – -Spill Response flowchart - Safety Incident Procedure	-Site Induction and record -Personal Protective equipment	1

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Hazardous chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ³	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
						-Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register		
Engine Coolant	Yes	205L	Oil and grease store	Map 3.1	no	-Site Induction and record -General Site Environmental Management – -Spill Response flowchart - Safety Incident Procedure -Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register	-Site Induction and record -Personal Protective equipment	6
Compressed gases	Yes	Size E x3	Oil and grease store	Map 3.1	no	-Site Induction and record -General Site Environmental Management – - Safety Incident Procedure	-Site Induction and record -Personal Protective equipment	5

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Hazardous chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ³	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
						-Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register		
diesel	Yes	15,000L	Above ground fuel tank	Map 3.1	Only in extreme cases where spills threaten to impact on health of waterway – ie groundwater	- Management of bulk fuel -Site Induction and record -General Site Environmental Management – -Spill Response flowchart - Safety Incident Procedure -Dangerous goods and hazardous substances management -Dangerous and Hazardous goods register	-Site Induction and record -Personal Protective equipment	2 and 3
Encrusting agent	Yes		Oil and grease store	Map 3.1	no	-Site Induction and record -General Site Environmental Management – -Spill Response flowchart	-Site Induction and record -Personal Protective equipment	6

List Of Polluting Substance Storages/Uses At Site Initial Assessment – Hazardous chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date: October 2024
Name / description	Hazardous Chemicals	Amount stored	Location of storage	Map ref	Need for early warning ³	Pre-emptive action ref	Ref to safety coverage	Ref to Hazard and likelihood assessment
						– Safety Incident Procedure -Dangerous goods and hazardous substances management –Dangerous and Hazardous goods register		
herbicide	Yes	1L	Oil and grease store	Map 3.1	no	–Site Induction and record –General Site Environmental Management – –Spill Response flowchart – Safety Incident Procedure -Dangerous goods and hazardous substances management –Dangerous and Hazardous goods register	-Site Induction and record -Personal Protective equipment	4
Sewage	Yes	2000L	Septic tank	3.1	no	-monitoring and treatment reports		7



Hazard and Likelihood Risk assessment and Corrective Control Measures – Hazardous Chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Pri o ri ty	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
1.Use and storage of oils and grease	Spill causing ground contamination	L	P	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction	Landfill Manager	
	Spill causing groundwater contamination	L	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL	Landfill Manager	
	Spill entering stormwater drain off site	H	U	M	Unlikely but possible	1. SYDNEY RECYCLING PARK -Management of bulk fuel 2. SYDNEY RECYCLING PARK –Spill Response flowchart 3. SYDNEY RECYCLING PARK -Stormwater management and monitoring 4. Staff induction and training	Landfill Manager	
2.storage of fuel in above ground tank	Leak from tank causing ground contamination	M	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. SYDNEY RECYCLING PARK -Management of bulk fuel 4. Integrity testing performed 2013	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Hazardous Chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Pri o ri ty	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
3.Refuelling of mobile equipment	Leak from tank causing groundwater contamination	M	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. SYDNEY RECYCLING PARK -Management of bulk fuel 4. Groundwater monitoring as per EPL 5. Integrity testing performed 2013	Landfill Manager	
	Fire on site causing combustion of material in tank	H	P	H	possible	1. Staff training and induction 2. SYDNEY RECYCLING PARK -Management of bulk fuel 3. SYDNEY RECYCLING PARK – emergency response to fire incident	Landfill Manager	
	Spill causing ground contamination	M	V	H	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction	Landfill Manager	
	Spill causing groundwater contamination	L	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Hazardous Chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
	Spill entering stormwater drain	L	P	L	Unlikely but possible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK -Management of bulk fuel 2. SYDNEY RECYCLING PARK –Spill Response flowchart 3. SYDNEY RECYCLING PARK -Stormwater management and monitoring 4. Staff induction and training 	Landfill Manager	
4.Application of herbicides	Spill causing ground contamination	M	U	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 	Landfill Manager	
	Spill causing groundwater contamination	L	U	L	negligible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL 	Landfill Manager	
	Spill entering stormwater drain	L	P	L	Unlikely but possible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK -Management of bulk fuel 2. SYDNEY RECYCLING PARK –Spill Response flowchart 3. SYDNEY RECYCLING PARK -Stormwater management and monitoring 4. Staff induction and training 	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Hazardous Chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
5.Use and storage of compressed gases	explosion	M	U	L	Possible	1. Staff induction and training 2. secure storage of cylinders	Landfill Manager	
	fire	L	U	L	possible	1. Staff induction and training 2. Secure storage of cylinders	Landfill Manager	
6.Use and storage of other chemicals	Spill causing ground contamination	M	P	M	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction	Landfill Manager	
	Spill causing groundwater contamination	L	U	L	negligible	1. SYDNEY RECYCLING PARK –Spill Response flowchart 2. Staff training and induction 3. Groundwater monitoring as per EPL	Landfill Manager	

Hazard and Likelihood Risk assessment and Corrective Control Measures – Hazardous Chemicals Sydney Recycling Park								
Site Name: Sydney Recycling Park					Responsible person: Landfill Manager			Date October 2024
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
	Spill entering stormwater drain	L	U	L	Unlikely but possible	<ol style="list-style-type: none"> 1. SYDNEY RECYCLING PARK -Management of bulk fuel 2. SYDNEY RECYCLING PARK –Spill Response flowchart 3. SYDNEY RECYCLING PARK -Stormwater management and monitoring 4. Staff induction and training 	Landfill Manager	
7.Use of septic system	Overflow of tank	M	U	L	negligible	<ol style="list-style-type: none"> 1. Routine monitoring and treatment 2. Regular reporting 3. Use of biological treatment 	Landfill Manager	
	Insufficient or incorrect tank treatment	L	P	L	negligible	<ol style="list-style-type: none"> 1. Routine monitoring and treatment 2. Regular reporting 3. Use of biological treatment 	Landfill Manager	

APPENDIX 2

1. REGULATORY REQUIREMENTS

PIRMP Legislation

POEO Act Part 5.7

Duty of licence holder to prepare pollution incident response management plan

- 153 A** The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

Information to be included in plan

A pollution incident response management plan must be in the form required by the regulations and must include the following:

- (a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:
- (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
 - (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
 - (iii) any persons or authorities required to be notified by Part 5.7,
- 153 C** (b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,
- (c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,
- (d) any other matter required by the regulations.

Keeping of plan

- 153 D** A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.

Testing of plan

- 153 E** A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.

Implementation of plan

- 153 F** If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.

POEO (General) Regulation 2022**Chapter 4 Pollution incident response management plans****70 Definition**

In this Chapter—

PIRM plan means a pollution incident response management plan required to be prepared under the Act, Part 5.7A.

71 Form of plan—the Act, s 153C

A PIRM plan—

- (a) must be in written form, and
- (b) may form part of another document required to be prepared under or in accordance with another law if the information required to be included in the PIRM plan is readily identifiable as that information in that other document.

72 General licences—additional matters to be included in PIRM plan—the Act, s 153C

For the Act, section 153C(d), the following matters must be included in a PIRM plan—

- (a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the *relevant activity*),
- (b) the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,
- (c) details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of the relevant activity,
- (d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,
- (e) the maximum quantity of a pollutant likely to be stored or held at particular locations, including underground tanks, at or on the premises to which the licence relates,
- (f) a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident,
- (g) the names, positions and 24-hour contact details of individuals who—
 - (i) are responsible for activating the PIRM plan, and
 - (ii) are authorised to notify relevant authorities under the Act, section 148, and
 - (iii) are responsible for managing the response to a pollution incident,
- (h) the contact details of each relevant authority referred to in the Act, section 148,
- (i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near the premises to which the licence relates or where the scheduled activity is carried on,
- (j) the arrangements for minimising the risk of harm to persons who are on the premises or who are present where the scheduled activity is being carried on,

- (k) a detailed map, or set of maps, showing the location of the premises to which the licence relates, the surrounding area likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of stormwater drains on the premises,
- (l) a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,
- (m) the nature and objectives of a staff training program in relation to the PIRM plan,
- (n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,
- (o) the dates on which the PIRM plan is updated,
- (p) the way in which the PIRM plan must be tested and maintained.

73 Additional matters to be included in PIRM plan—the Act, s 153C

- (1) For the Act, section 153C(d), the following must be included in a PIRM plan for a relevant licence—
 - (a) the names, positions and 24-hour contact details of each individual who is—
 - (i) responsible for activating the PIRM plan, or
 - (ii) authorised to notify relevant authorities under the Act, section 148, or
 - (iii) responsible for managing the response to a pollution incident,
 - (b) the contact details of each relevant authority referred to in the Act, section 148,
 - (c) a community engagement protocol that includes procedures for notifying people living or working near a pollution incident and keeping them informed of relevant matters,
 - (d) details of pre-emptive action required to minimise or prevent a risk of harm to human health or the environment arising out of the activity, including, as a minimum, action that complies with the requirements set out in the [*Protection of the Environment Operations \(Waste\) Regulation 2014*](#), clauses 70, 72 and 73,
 - (e) the nature and objectives of a staff training program in relation to the PIRM plan,
 - (f) the date on which the PIRM plan is tested and the name of the person who carried out the test,
 - (g) the method for testing and maintaining the PIRM plan.
- (2) Section 72 does not apply to a PIRM plan for a relevant licence.
- (3) In this section—

relevant licence means a licence authorising the following—

- (a) an environmentally hazardous activity within the meaning of the Act, Schedule 1, clause 46,
- (b) an activity to which the Act, Schedule 1, clause 48 applies.

74 Availability of PIRM plan—the Act, s 153D

- (1) A PIRM plan must be made readily available—
 - (a) to an authorised officer on request, and
 - (b) to a person who is responsible for implementing the PIRM plan at the premises—
 - (i) to which the relevant licence relates, or
 - (ii) where the activity takes place.
- (2) A PIRM plan must be made publicly available in the following way within 14 days after it is prepared—
 - (a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan,
 - (b) if the person does not have a website—by providing a copy of the PIRM plan, without charge, to a person who makes a written request for a copy.
- (3) Subsection (2) applies only in relation to a part of a PIRM plan that includes the information required under—
 - (a) the Act, section 153C(a), and
 - (b) this Regulation, section 72(h) and (i) or 73(b)(ii) and (iii).
- (4) Personal information, within the meaning of the [*Privacy and Personal Information Protection Act 1998*](#), is not required to be included in a PIRM plan made available to a person other than an authorised officer.

75 Testing of PIRM plan—the Act, s 153E

- (1) A PIRM plan must be tested—
 - (a) routinely at least once every 12 months, and
 - (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.
- (2) The test must be carried out in a way to ensure the following—
 - (a) the information included in the PIRM plan is accurate and up to date,
 - (b) the PIRM plan is capable of being implemented in a workable and effective way.
- (3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.

