

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN – (PIRMP)

Cleanaway Operations Pty Ltd Homebush & Mobile PFAS Plant

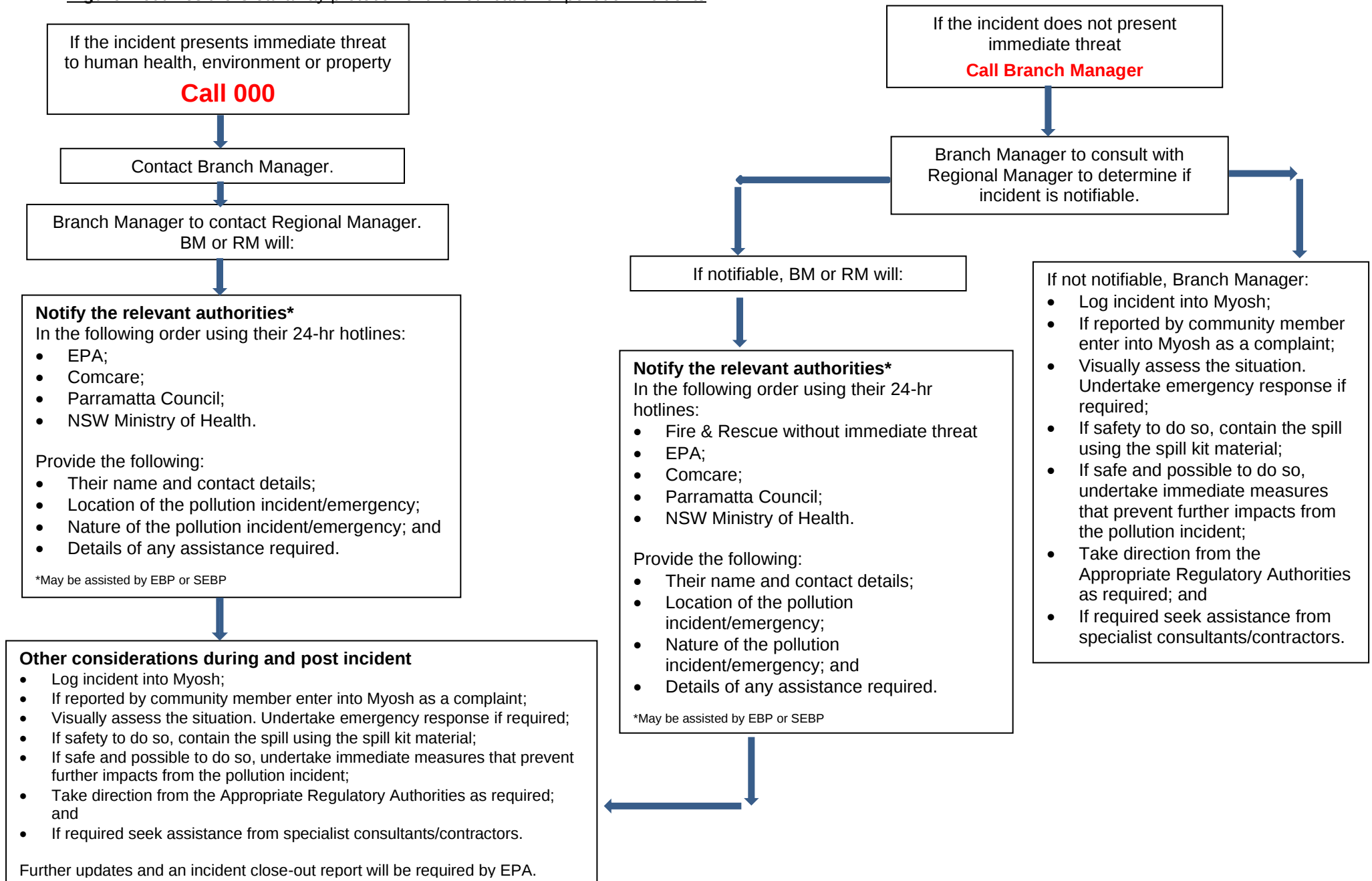
***Cnr Hill Rd and Pondage Link
Sydney Olympic Park NSW 2127***

EPA LICENCE NO. 4560 & 21281

Revision Status:

Date	Issue	By	Checked	Approved and understood by
01/02/22	12	MW	HR	BW / MW
27/01/23	13	HR	MW	MW

Figure 1 outlines the Cleanaway protocol for the notification of pollution incidents



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) – LTS Homebush

Approved by: Name: Michael Wassif

Position/Title: Branch Manager

Date: 27/01/2023

PURPOSE:

Cleanaway Operations Pty Ltd (Cleanaway) holds an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for the Homebush site. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at Homebush or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2022.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2022.

Licensees should also refer to the NSW EPA's *Guideline: Pollution incident response management plans*.

1. Environment Protection Licence (EPL) Details

Name of licensee: (including ABN)	Cleanaway Operations Pty Limited 40 010 745 383
EPL number:	4560 (Homebush EPL) & 21281 (Mobile Plant EPL)
Premises name and address:	Cleanaway Operations Pty Ltd Cnr Hill Rd & Pondage Link Sydney Olympic Park NSW 2127
Company or business contact details:	Please note, this section has been removed from the version published on the Cleanaway Website. Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.
Website address:	www.cleanaway.com.au
Scheduled activity on EPL:	Waste Processing (non-thermal treatment); Waste Storage; Mobile waste processing.
Fee based activity on EPL:	Non-thermal treatment of hazardous and other waste; Waste Storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste; Mobile waste processing.

2. Pollution incident – Person/s responsible

PIRMP activation and management of response to an incident Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

3. Pollution incident – Notification of relevant authorities

Notifying relevant authorities Please note, this section has been removed from the version published on the Cleanaway Website.

Note: Notification should be made by a person with an appropriate level of authority within the company.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

Relevant Authority	Contact number
Fire & Rescue NSW / Rural Fire Service	000
Fire & Rescue without immediate threat	1300 729 579
Environment Protection Authority	13 15 55
NSW Ministry of Health	(02) 9391 9000 or After hours 9515 6111 (ask for Public Health Officer on call)
Comcare	1300 366 979
Local authority (Parramatta Council)	(1300 617 058

4. Notification of neighbours and the local community (including communication mechanisms)

A list identifying immediate neighbours of the site is provided below.

Contact numbers for the neighbours are:

Business name	Contact Number
UGL	9474 3088
Qudos Arena	8765 4461
SOPA (Broader SOPA estate incl. ANZ and Spotless Stadia)	Office Hours: 9714 8888 After Hours: 9714 7700
Cleanaway SRN Transfer Station – Auburn TFS	1300 651 116
Newington School	9748 4933
Other Potentially Affected Neighbours in Newington and SOPA estate	Notify Potentially affected neighbours in conjunction with Fire Brigade notification system

Impacts on the broader community are variable and depend on location, or other factors such as wind direction and velocity. In the event of a pollution incident occurring (such as a Fire) which has the potential to impact residential areas, communication methods will be used on a case by case basis and in all situations Cleanaway will liaise with Council and Fire and Rescue to provide early warnings to directly affected residents by the mechanisms described below. Early warnings are to include details of what the imminent incident is and how those affected can prepare and respond to the incident. The notification shall provide specific information to the neighbouring properties and local community, so it can minimise the risk of harm.

In the event of a pollution incident Cleanaway (CWY), in consultation with Council, will attempt to provide early warning to directly the community by the following mechanisms as appropriate:

- Telephone calls or door knocking (where appropriate);
- Mail box drops;
- Warning signs;
- Local media source (radio/newspapers);
- Council webpage updates and media releases; and
- Council website address is <https://www.cityofparramatta.nsw.gov.au>.

5. Description and likelihood of hazards

Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

6. Pre-emptive actions

Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

7. Inventory of pollutants

Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

8. Safety equipment

Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

9. Minimising harm to persons on the premises

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

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

The site has established a site-specific emergency management plan (SEMP) which details relevant emergency protocols including evacuation procedures, medical emergency procedures and environmental incidents. The SEMP also contains a Site Emergency Response list which details the sites emergency controller, fire warden and other relevant emergency contact details. This PIRMP is therefore supplemented by the information and works in unison with the SEMP.

Additionally, as part of the preparations for the PIRMP, training and drills will be undertaken with staff (refer Sections 13 'Training' and 14 'Testing').

10. Maps

Please note, this section has been removed from the version published on the Cleanaway Website.

Members of the community can contact the Community Hotline on 1800 213 753 to raise any queries, complaints or concerns with the business.

11. Actions to be taken during or immediately after a pollution incident

Actions to Minimise a Pollution Incident:

The risk assessment in Section 5 of the PIRMP 'Description of Likelihood of hazards', outlines potential pollution incidents at the Premises (additionally the site maintains a site specific Environmental Risk Register). For each potential pollution risk, there are a number of controls outlined. Some general controls which are in place to reduce the likelihood of pollution incident occurring include:

- Risk Assessments on work tasks;
- SDS Documentation;
- Standard Operating Procedures;
- Incident and Hazard Management;
- Inspections and workplace audits;
- ISO 14001 Environment Management Audits;
- ISO 9001 Quality Management Audits;
- AS/NZS 4801 Safety Management Audits;
- Emergency Management;
- Regular testing and maintenance;
- Spill kits;
- Treatment plant and Tank Bunding;
- Air / Odour Scrubber system;
- Correct storage and waste management; and
- Training.

CWY operations make all attempts to ensure prevent pollution events to ensure environmental incidents do not occur, but in a situation where a pollution incident is imminent and may potentially cause detrimental impacts to human health or the environment, onsite operations will contact the necessary stakeholders (employees, contractors, neighbours, Regulatory Authorities) to provide as much early warning as possible.

Actions During a Pollution Incident

In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site SEMP. All staff are informed on the location of muster locations through site inductions, signage and ongoing training.

Licensees are required to report pollution incidents '**immediately**' (without delay) to the Relevant Regulatory Authorities. In the event of a pollution incident, the person which has identified the incident should immediately contact the Branch Manager / Regional Manager. The person reporting the pollution incident should provide the following key details:

- Their name and contact details;

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

Some general controls for managing a pollution incident include:

- Visually assess the situation. Undertake emergency response if required;
- If safe to do so, contain the spill using the spill kit material;
- Contact the appropriate regulatory authorities in accordance with the PIRMP;
- If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident (i.e. mobilise vacuum tanker to site, apply spill response material to the incident area or utilise fire extinguishers onsite);
- Take direction from the Appropriate Regulatory Authorities as required; and
- If required seek assistance from specialist consultants/contractors.

Actions Post a Pollution Incident

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

The incident will be reported in the Myosh incident management system. If CWY are notified of the pollution incident by the public, a complaint will also be registered in the Myosh reporting system.

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

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

12. Coordinating with Persons & Regulators

Licensees must notify all of the appropriate Regulatory Authorities following a notifiable incident. These include:

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

As outlined in Section 3 of the PIRMP 'Pollution incident - Notification of relevant authorities', notification of the incident is to be provided by the Branch Manager, Regional Manager or Tertiary contact.

All Communications are to be made to:

Branch Manager; and
Regional Manager.

13. Staff Training

Annual PIRMP toolbox meetings will be completed with staff on the site. This training will be provided to ensure that all staff are aware of the content, processes and requirements of the plan and competently implement if necessary.

This PIRMP toolbox is in addition to Cleanaway's other training modules and induction processes.

14. Testing & Updating of the PIRMP

Plans must be tested routinely at least once every 12 months and within one month of any pollution incident occurring. The testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. Testing may include:

- Desktop scenarios, or
- Physical Scenarios.

Testing records will be maintained electronically on the 'MyOSH' database (entered as Drill & Exercise > PIRMP Test).

Date PIRMP tested	PIRMP tested by	Type of test (drill or desktop)	Learnings	Next scheduled test
27/01/23	Michael Wassif and Plant Operators	Desktop	Need to clarify for plant operators when to contact external authorities	January 2024