

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN – (PIRMP)

## Cleanaway Pty Ltd Lucas Heights Resource Recovery Park

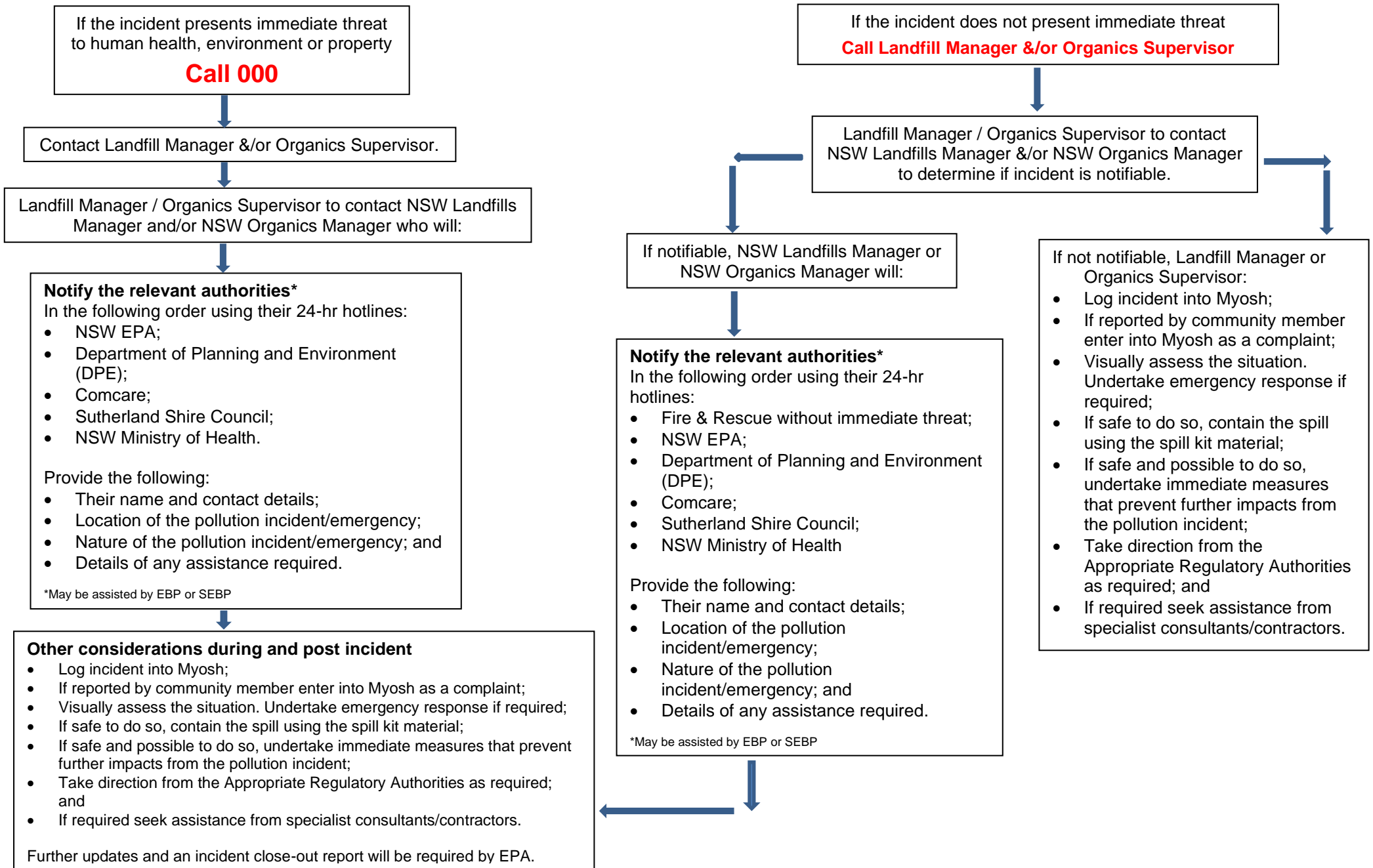
*New Illawarra Rd,  
Lucas Heights NSW 2234*

**EPA LICENCE NO.12520 & 5065**

**Revision Status:**

Date	Issue	By	Checked	Approved and understood by
05/01/2022	Previous Issue	Previous SUEZ Template		
26/05/2022	1	AP	HR	LC/LS
05/05/2023	2	NA / HR	HK, LC & LS	LC/LS

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



**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) – Lucas Heights Resource Recovery Park**

**Approved by: Name: LC Chiang  
Louise Saunders**

**Position/Title: Lucas Heights Landfill Manager  
NSW Organics Manager**

**Date: 05/05/2023**

**PURPOSE:**

Cleanaway Pty Ltd (Cleanaway) holds an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for the Lucas Heights Resource Recovery Park. 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 during 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 Lucas Heights Resource Recovery Park 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

<b>Name of licensee:</b> (including ABN)	<b>Cleanaway Pty Limited</b> 79 000 164 938
<b>EPL number:</b>	<b>5065 (Landfill) &amp; 12520 (Organics)</b>
<b>Premises name and address:</b>	<b>Lucas Heights Resource Recovery Park New Illawarra Rd, Lucas Heights NSW 2234</b>
<b>Company or business contact details - Landfill:</b>	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
<b>Company or business contact details - Organics:</b>	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
<b>Website address:</b>	<a href="http://www.cleanaway.com.au">www.cleanaway.com.au</a>
<b>Community Hotline:</b>	1800 213 753
<b>Emergency Spills Hotline:</b>	1800 SPILLS (1800 774 557)
<b>Scheduled activity on EPL 5065:</b>	Waste disposal (application to land); Waste processing (non-thermal treatment); Waste storage.

**Fee based activity on EPL 5065:** Non-thermal treatment of liquid waste;  
Waste disposal by application to land;  
Waste storage - other types of waste;  
Waste storage - waste tyres.

**Scheduled activity on EPL 12520:** Composting;  
Waste processing (non-thermal treatment).

**Fee based activity on EPL 12520:** Composting;  
Non-thermal treatment of general waste.

## 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	<b>000</b>
Fire & Rescue without immediate threat	<b>1300 729 579</b>
Environment Protection Authority	<b>13 15 55</b>

Department of Planning and Environment (DPE)

**1300 420 596** or [info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)

NSW Ministry of Health (South Western Sydney LHD)

**(02) 9794 0855** or **After hours 8738 3000** (ask for **Public Health Officer on call**)

Comcare

**1300 366 979**

Local authority (Sutherland Shire Council)

**(02) 9710 0333**

#### 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
ANSTO	(02) 9717 3111
Energy Developments	John Leijen - 0410 449 626
Other Potentially Affected Neighbours	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 directly to the community by the following mechanisms as appropriate:

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

## 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.

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## 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;
- Stormwater and leachate containment dams;
- Correct storage and waste management; and
- Training.

CWY operations shall make all attempts to ensure pollution events and 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.

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### Actions During a Pollution Incident

If 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

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incident, the person which has identified the incident should immediately contact the Primary and/or Secondary contacts listed above. The person reporting the pollution incident should provide the following key details:

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

Some general controls for managing a pollution incident include:

- Visually assess the situation. Undertake emergency response if required;
- If 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.

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#### 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 the appropriate Regulatory Authorities following a notifiable incident. These include:

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

As outlined in Section 3 of the PIRMP 'Pollution incident - Notification of relevant authorities', notification of the incident is to be provided by the Primary Contact or Secondary contact.

**All Communications are to be made to:**

Landfill Manager / Organics Supervisor; and  
NSW Landfills Manager / NSW ARRT & Organics 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
24/04/2023	LC Chiang, Sanjesh Prasad and Michael Gaebler	Desktop	N/A	April 2024