

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN – (PIRMP)

Cleanaway Daniels Pty Ltd CWYD Orange

Unit 1/185-191 Byng St, Orange NSW 2800

EPA LICENCE NO.12171



Revision Status:

Date	Issue	Ву	Checked	Approved and understood by
02/07/21	1	HR	CL	CL
08/11/21	2	HR	Updated contact details	
21/06/22	3	HR	NW	NW
11/07/23	4	NA/HR	LS / JP	JP
12/07/24	5	МН	LS/RG	RG

Figure 1 outlines the Cleanaway protocol for the response to pollution incidents

If the environmental incident causes or threatens to cause environmental harm Implement PIRMP

Incident is managed by the Responsible Person/s (refer to Section 2). This is the Site Manager or their Deputy.

Responsible person to delegate the following actions:

- Visually assess the situation.
- Evacuate the site (or part of site) if there is an immediate threat to human health.
- Commence protocol for the notification of pollution incidents (see Figure 2, Line A).
- Take action/s to minimise environmental impact if safe to do so (refer to Section 6).
- Isolate source of spill, noise, odour etc if safe to do so.
- Commence clean-up if source can be isolated and it is safe to do so.
- When emergency services arrive on site, they become site controller.
- Site Manager to update regulatory authorities on incident and actions taken by site personnel.
- Site Manager to implement actions as directed by regulatory authorities.

Other actions during and post incident*

- · Log incident into Myosh;
- If reported by community member enter into Myosh as a complaint;
- If required seek assistance from specialist consultants/contractors; and
- Further updates and an incident close-out report will be required by EPA.

If the environmental incident does not cause or threaten to cause environmental harm

Call Site Manager

Site Manger to delegate the following actions:

- Visually assess the situation.
- Evacuate the site (or part of site) if there is an immediate threat to human health.
- Commence protocol for the notification of pollution incidents (see Figure 2, Line B).
- Take action/s to minimise environmental impact if safe to do so (refer to Section 6).
- Isolate source of spill, noise, odour etc if safe to do so.
- Commence clean-up if source can be isolated and it is safe to do so.

Other actions during and post incident*

- Log incident into Myosh;
- If reported by community member enter into Myosh as a complaint; and
- If required seek assistance from specialist consultants/contractors.

*May be assisted by EBP or SEBP

A. If the incident presents immediate threat to human health, environment or property

Call 000

Contact Regional Manager, General Manager and Senior Environmental Business Partner.

Notify the relevant authorities*

In the following order using their 24-hr hotlines (refer to Section 3):

- EPA;
- Comcare:
- · Orange Council; and
- NSW Ministry of Health

Provide the following:

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

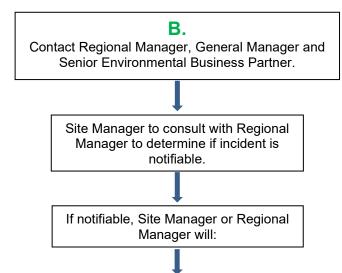
*May be assisted by EBP or SEBP

If pollution incident is causing or threatens to cause harm to human health outside of premises:

- Contact neighbours by phone refer to Section 4 for names and contact numbers of neighbours.
- If unable to contact by phone, then physically visit business address (assisted by Emergency Services, where required).

If pollution incident continues then further notification may need to occur (refer to Section 9) including:

- Mailbox drops;
- Warning signs;
- Media release; and
- Cleanaway webpage updates.



Notify the relevant authorities*

In the following order using their 24-hr hotlines (refer to Section 3):

- Fire & Rescue without immediate threat;
- EPA;
- · Comcare;
- Orange Council; and
- NSW Ministry of Health.

Provide the following:

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

*May be assisted by EBP or SEBP



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) - Orange NSW

Approved by: Name: Raymund Grovenor

Position/Title: Branch Manager Date: 12/07/24

PURPOSE:

Cleanaway Daniels Pty Limited (formerly known as Sterihealth NSW Pty Ltd) holds an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for the Orange – Byng St (CWYD Orange) premise. 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 CWYD Orange 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.

- Location of PIRMP (hardcopy) onsite: Administration Office
- Location of PIRMP (softcopy): Site Files & Cleanaway Portal

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.

• Location of PIRMP (website copy): https://www.cleanaway.com.au/about-us/our-business/environmental-management/

<u>NOTE:</u> 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.



RELATIONSHIP WITH OTHER DOCUMENTS:

This Plan should be read in conjunction with the following documents:

- CWYD Orange Site Emergency Management Plan (HSE PL 2.1.3.01.01)
- CWYD Orange Environmental Risk Register

These documents are located at https://cleanaway.sharepoint.com/sites/portal/pages/LandingPage.aspx



1. Environment Protection Licence (EPL) Details				
Name of licensee:	Cleanaway Daniels Pty Limited			
(including ABN)	83 060 871 249			
EPL number:	12489			
Premises name and address:	Sterihealth NSW Pty Ltd			
	Unit 1/185-191 Byng Street			
	Orange NSW 2800			
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			
Community Hotline:	1800 213 753			
Emergency Spills Hotline:	1800 SPILLS (1800 774 557)			
Scheduled activity on EPL:	Waste Storage.			
Fee based activity on EPL:	Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos 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 Note: Notification should be made by a person with an appropriate level of authority within the company.

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.

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	1300 066 055
Comcare (see note below)	1300 366 979
Local authority (Orange Council)	1300 650 511
NSW Ministry of Health	(02) 9391 9000 or After hours 9515 6111 (ask for Public Health Officer on call)

Note:

The NSW EPA requires EPL holders to contact SafeWork NSW when their PIRMP is activated. As a national business, Cleanaway is regulated by Comcare, the national authority for work health and safety, workers' compensation and WHS laws in Australia. To meet our Health and Safety obligations, we must notify Comcare instead of SafeWork NSW. Therefore, the SafeWork NSW contact details are not included above to align with these requirements and to avoid confusion.



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
Colour City Dance	0412 078 629
Renshaw & Co Irrigation	(02) 6362 9805
Orange City Strength and Conditioning	0428 648 444
TradeLink	(02) 6330 7860
Anton Hartley Colour City Painting	0409 626 809
Kitpro Kitchens	(02) 6362 9068
Other Potentially Affected Neighbours	Notify potentially affected neighbours in conjunction with Fire Brigade notification system. In the event of an incident, ensure to notify all other tenants in the 191 Byng St complex and adjacent residential receivers.



5. Description and likelihood of hazards

The potential hazards that may arise from the operation of the scheduled activities at the site may include:

- Stormwater Impact;
- Fire or explosion;
- Odour and/or Air Emissions;
- · Noise Emissions; and
- · Hazardous Substance Release / spill.

The following table provides the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood. The site also maintains a detailed Environmental Risk Register which details a range of information about the facility and its controls. Refer to Sections 1 to 5 of the Environmental Risk Register for more information.

Pollution Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood
Stormwater Impact	Unlikely	 Period of prolonged rainfall (i.e. 1 in 100 yr. storm event), Lack of stormwater water storage capacity/freeboard, Sediment tracking due to increased vehicle movements / traffic movements onsite, See "Hazardous Substance Release / spill" below.
Fire or explosion	Unlikely	 Machinery fault, Extreme weather (days of total fire ban), Hot work, Smoking in unauthorised areas, Electrical hazards, Inappropriate placement of waste (i.e. segregation issue) or inappropriate waste storage in DG compartments / buildings onsite (i.e. placement in wrong compartment / area), Acceptance of potentially flammable or explosive waste types, Improper labelling, storage, movement or decanting / consolidating of waste onsite, Improper use of onsite equipment in DG storage, laydown and/or processing areas.
Odour and/or Air Emissions	Unlikely	Fire,Odorous waste,



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		 Long term waste storage – in storage vessels, unloading / temporary storage area or warehouse/s, Odour from decanting activities / crushing activities,
		Poor housekeeping.
		Noisy machinery due to lack of maintenance,
Noise Emissions	Doggible	 Truck movements or machinery movements outside of workshop,
Noise Emissions	Possible	Truck maintenance activities occur onsite,
		Operating outside licenced hours.
	Unlikely	Flooding,
		 Pipe blockage or breakage resulting in overflow into bunded areas or stormwater system,
		Fuel / chemical / liquid waste leak,
		Leak / spill from truck/s arriving onsite,
Hazardous Substance		 Inappropriate unloading / loading practices – in unloading and temporary storage area,
Release / Spill		 Fuel or chemicals or other liquids stored external to bunded areas – not within dedicated bunded storage areas,
		Hydraulic oil leak from mobile or fixed plant,
		Poor housekeeping,
		See "Stormwater Impact" above.



6. Pre-emptive actions

The following table provides a description of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the Premises. Further, the site also maintains an Environmental Risk Register which details a range of information about the facility and its pre-emptive controls. Refer to Sections 1 to 5 of the Environmental Risk Register for more information.

In addition to the above, the Site Emergency Management Plan (SEMP), Appendix 1: Emergency Response Guidance, provides detailed information on responding to different emergency scenarios including site evacuation procedures.

Pollution Hazard	Pre-emptive Action	How Pre-emptive Action Minimises Harm	Actions to be taken during or immediately after incident
Stormwater Impact	 Plant and equipment maintenance schedule in place. EMS documentation in place (Stormwater Management Plan, Liquid and Solid Waste Storage Plan, SEMP & PIRMP etc). SOPs or Work Instruction/s in place. Spills kits located throughout the site. Staff Training. See "Hazardous Substance Release / Spill" below. 	 Plant and equipment in good working order. All site activities are risk assessed. Environmental risks on site are identified, controls identified and managed. Staff trained in site environmental risks and controls. Regular site inspections conducted to check controls are in place and no further risks have been introduced. Clean-up attempts / rectification actions (where relevant) to be made with appropriate personal protective equipment (PPE). 	 Contact the Branch Manager who will coordinate incident response. Identify source of spill and prevent further spillage as far as is practical. Isolate spill from site stormwater system where possible. Ensure site stormwater system is isolated from external stormwater system. Apply absorbent material socks/pads/bunds/booms or similar as appropriate (spill containment measures) – in alignment with CWY Spill Response Training and industry best practice. Evacuate the site if there is an immediate human threat. If incident represents an immediate threat to the environment or human health or property, call Fire and Rescue service on 000 and call the EPA on 131 555 to give details of the incident (see Figure 1-2 above). Where appropriate notify other relevant authorities and the neighbouring properties (see Figure 1-2 above). When emergency services arrive on site, they become site controller. Branch Manager updates regulatory authorities and follows their directions (where directed).



Fire or explosion	 Plant and equipment maintenance schedule in place. EMS documentation in place (Stormwater Management Plan, Liquid and Solid Waste Storage Plan, SEMP & PIRMP etc). SOPs or Work Instruction/s in place. SDS & site manifest available on site. Fire extinguishers and associated fire equipment (see Safety Equipment table below). Dedicated chemical and DG storage areas and chemical segregation in place. DG labelling and signage. DG priority area/s. Ventilation system/s (i.e. including fans). Staff Training. Fire / chemical segregation walls (where applicable). 	 Plant and equipment in good working order. All site activities are risk assessed. Environmental risks on site are identified, controls identified and managed. Staff trained in site environmental risks and controls. Regular site inspections conducted to check controls are in place and no further risks have been introduced. Clean-up attempts / rectification actions (where relevant) to be made with appropriate personal protective equipment (PPE). 	 Undertake investigation to better understand how / why spill occurred, implementing additional controls where relevant / where possible. Contact the Branch Manager who will coordinate incident response. If safe, shutdown plant / equipment as per shutdown procedure. If safe, isolate power source and ignition sources. Evacuate the site if there is an immediate human threat. If safe, and fire water is being generated onsite mobilise vacuum tanker to collect and transport firewater to a licenced wastewater treatment plant. If incident represents an immediate threat to the environment or human health or property, call Fire and Rescue service on 000 and call the EPA on 131 555 to give details of the incident (see Figure 1-2 above). Where appropriate notify other relevant authorities and the neighbouring properties (see Figure 1-2 above). When emergency services arrive on site, they become site controller. Branch Manager updates regulatory authorities and follows their directions (where directed). Undertake investigation to better understand how / why fire or explosion occurred, implementing additional controls where relevant / where possible.
Odour and/or Air Emissions	 Plant and equipment maintenance schedule in place. EMS documentation in place (Stormwater Management Plan, Liquid and Solid Waste Storage Plan, SEMP & PIRMP etc). SOPs or Work Instruction/s in place. No grease trap waste receivals occur at the site. 	 Plant and equipment in good working order. All site activities are risk assessed. Environmental risks on site are identified, controls identified and managed. Staff trained in site environmental risks and controls. 	 Contact the Branch Manager who will coordinate incident response. Identify source of odour/air emission and prevent further emissions as far as is practical. Evacuate the site if there is an immediate human threat. If incident represents an immediate threat to the environment or human health or property, call Fire and Rescue service on 000 and call the EPA on



Hazardous Substance Release / Spill	 Plant and equipment maintenance schedule in place. EMS documentation in place (Stormwater Management Plan, 	 Plant and equipment in good working order. All site activities are risk assessed. 	 Contact the Branch Manager who will coordinate incident response. Identify source of spill and prevent further spillage as far as is practical.
Noise Emissions	 Plant and equipment maintenance schedule in place and conducted by a qualified tradesperson on all mobile and plant equipment. EMS documentation in place (Storm Water Management Plan, Liquid and Solid Waste Storage Plan, SEMP & PIRMP etc). SOPs or Work Instruction/s in place. Mobile and fixed plant and machinery meet requirements. Staff Training. Site zoned within an Industrial area. 	 Plant and equipment in good working order All site activities are risk assessed. Environmental risks on site are identified, controls identified and managed. Staff trained in site environmental risks and controls. Regular site inspections conducted to check controls are in place and no further risks have been introduced. Rectification actions to be made with appropriate personal protective equipment (PPE) 	 Contact the Branch Manager who will coordinate incident response. Isolate source of noise where possible. Evacuate the site if there is an immediate human threat. If incident represents an immediate threat to the environment or human health or property, call Fire and Rescue service on 000 and call the EPA on 131 555 to give details of the incident (see Figure 1-2 above). Where appropriate notify other relevant authorities and the neighbouring properties (see Figure 1-2 above). When emergency services arrive on site, they become site controller. Branch Manager updates regulatory authorities and follows their directions (where directed). Undertake investigation to better understand how / why noise emissions occurred, implementing additional controls where relevant / where possible.
	 Ventilation system/s (i.e. including fans). Staff Training. Site zoned within an Industrial area. 	 Regular site inspections conducted to check controls are in place and no further risks have been introduced. Clean-up attempts / rectification actions (where relevant) to be made with appropriate personal protective equipment (PPE) 	 131 555 to give details of the incident (see Figure 1-2 above). Where appropriate notify other relevant authorities and the neighbouring properties (see Figure 1-2 above). When emergency services arrive on site, they become site controller. Branch Manager updates regulatory authorities and follows their directions (where directed). Undertake investigation to better understand how / why odour or air emissions occurred, implementing additional controls where relevant / where possible.



- Liquid and Solid Waste Storage Plan, SEMP & PIRMP etc).
- SOPs or Work Instruction/s in place.
- Spills kits located throughout the site.
- Stormwater controls (bunding, drain inserts, shut-off valves) in place and secure.
 - o Blind Pits / Sumps.
 - Warehouse bunding.
 - o Site bunding.
- Staff Training.
- See "Stormwater Impact" above.

- Environmental risks on site are identified, controls identified and managed.
- Staff trained in site environmental risks and controls.
- Regular site inspections conducted to check controls are in place and no further risks have been introduced.
- Clean-up attempts / rectification actions (where relevant) to be made with appropriate personal protective equipment (PPE).

- Isolate spill from site stormwater system where possible.
- Ensure site stormwater system is isolated from external stormwater system.
- Apply absorbent material socks/pads/bunds/booms or similar as appropriate (spill containment measures) – in alignment with CWY Spill Response Training and industry best practice.
- Evacuate the site if there is an immediate human threat.
- If incident represents an immediate threat to the environment or human health or property, call Fire and Rescue service on 000 and call the EPA on 131 555 to give details of the incident (see Figure 1-2 above).
- Where appropriate notify other relevant authorities and the neighbouring properties (see Figure 1-2 above).
- When emergency services arrive on site, they become site controller. Branch Manager updates regulatory authorities and follows their directions (where directed).
- Undertake investigation to better understand how / why spill occurred, implementing additional controls where relevant / where possible.



7. Inventory of pollutants

The following table provides an inventory of potential pollutants at the Glendenning Premise:

Location of Substance:				DG		Volume
Depot No.	Proper Shipping Name	Types	UN	Class	Hazardous	(Maximum)
Bulk Tank No.				0.0.00		(

Medical and associated waste types that are stored onsite are not listed in this table as quantities may vary.

Please consultant the site EPL for approved waste types.

No other pollutants of environmental concern are stored onsite (i.e. no bulk storage of liquids, fuel, or liquid waste occurs)

8. Safety equipment

Further details about safety equipment and its locations are provided in the Site Emergency Management Plan Section 2. The safety equipment available onsite is listed below:

Safety Item	Quantity	Safety Item Location	Safety Item Use	Risk Mitigation Type
Fire extinguishers	2	2 Powder extinguishers – Inside Roller door & in the Office	Control and/or contain fires derived from paper, wood, textiles, flammable and combustible liquids, flammable gas (propane) and electricity energised equipment.	Eliminate and/or risk to human health and surrounding environment.
Fire hose		Outside Roller door	Control and/or contain fires.	Eliminate and/or risk to human health and surrounding environment.
Fire hydrant		N/A	Connection / water supply point - Control and/or contain fires.	Eliminate and/or risk to human health and surrounding environment.
First aid kit		Main Office	Used to treat minor injuries to personnel or reduce severity of moderate to major injury until emergency personnel arrive.	Eliminate and/or risk to Cleanaway personnel and contractors.
Spill kit		Inside roller door	Used to control and contain spills which may be potentially hazardous to personnel or the immediate and/or surrounding environment (e.g. stormwater).	Eliminate and/or reduce risk to personnel by containing and removing potentially hazardous spill.



				Eliminate and/or reduce risk of spill leaving the site and into surrounding environments (e.g. stormwater).
SDS register		Main Office	A tool accessible to all personnel which captures the SDS's of all hazardous chemicals used, handled or stored on site.	Used to ensure hazardous chemicals are being utilised in a manner that does not pose health risk to personnel or the environment as well as in the event of a spill.
SEMP		Main Office	A site-specific emergency management plan which details relevant emergency protocols and information.	Used to protect health of personnel and surrounding environment.
Emergency Assembly Point		Byng St	Assembly Point for all personnel on site in the event of an emergency	Used to account for and protect health of personnel.
AED (Defibrillator)	1	Office	Used in emergency situations where a person suffers a cardiac arrest, and their heart suddenly stops.	Reduce and/or eliminate risk to Cleanaway personnel and contractors.
Eyewash station	1	Strategically located around the facility (Refer to Map 3)	To remove material from eyes.	Reduce risk to human health.
Chemical splash goggles	As required	Personal Kit and Administration office	To protect eyes from chemical splashes and spills.	Reduce and/or eliminate risk to human health.
Chemical Resistant Gloves	As required	Personal Kit and Administration office	To protect hands from chemical splashes and spills.	Reduce and/or eliminate risk to human health.
Face shield	As required	Personal Kit and Administration office	To protect face from chemical splashes and spills, sparks and flying fragments.	Reduce and/or eliminate risk to human health.
Protective clothing or hazmat suit	As required	Personal Kit and Administration office	To protect body from chemical splashes and spills.	Reduce and/or eliminate risk to human health.
Fully enclosed safety footwear / rubber boots	As required	Personal Kit and Administration office	To protect feet from chemical splashes and spills.	Reduce and/or eliminate risk to human health.



Respirator (full face and combination filter)	As required	Personal Kit and Administration office	To protect lungs and respiratory system from chemical vapour and fumes.	Reduce and/or eliminate risk to human health.	
Hard hat or bump cap	As required Personal Kit and Administration office		To protect head from falling/overhead objects, chemical splashes and spills.	Reduce and/or eliminate risk to human health.	
Hearing protection	ring protection As required Personal Kit and Administration office		To prevent damage to hearing.	Reduce and/or eliminate risk to human health.	



9. Communicating with neighbours and the local community

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);
- Mailbox drops;
- Warning signs;
- Local media source (radio/newspapers);
- · Council webpage updates and media releases; and
- · Council website address is <a href="https://www.blacktown.nsw.gov.au/Contact-us/Contac



10. 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.

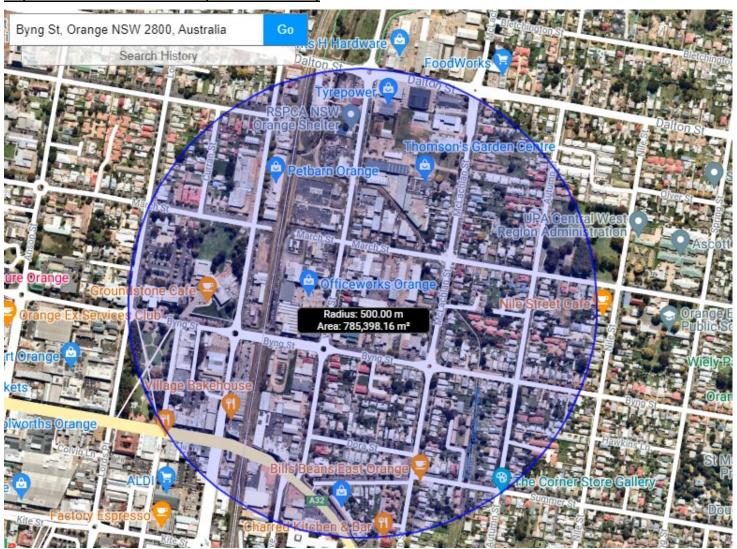
The site has established a site-specific emergency management plan (SEMP) which details relevant emergency protocols including evacuation procedures, medical emergency procedures and environmental incidents. The SEMP also contains a Site Emergency Response list which details the sites emergency controller, 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 14 'Training' and 15 'Testing').



11. Maps

Map 1 - General location of site (500 metre radius)



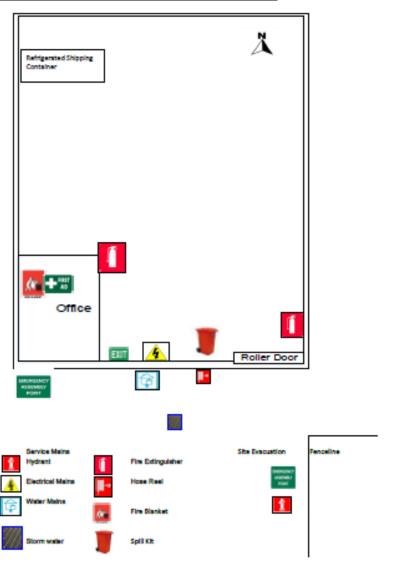


Map 2 - Site map





Map 3 - Stormwater Discharge Location Offsite





12. Actions to be taken during or immediately after 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 which details a range of information about the facility and its controls. Refer to Sections 1 to 5 of the Environmental Risk Register for more information.

Section 6 of the PIRMP 'Pre-emptive Actions' outlines the pre-emptive controls, how an identified risk to human health or the environment will be reduced and actions to be taken during or immediately following a pollution event to minimise its risk.

Actions to Minimise a Pollution Incident:

CWY operations shall make all attempts to prevent pollution events / to ensure environmental incidents do not occur, but in a situation where a pollution incident is imminent and it 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.

Further, CWY will abide by the requirements detailed in Section 147 and Section 153F of the POEO act.

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 Emergency Management Plan Appendix 1. All staff are informed on the location of muster locations through site inductions, signage and ongoing training.

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.



13. 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 and/or Tertiary contact/s..

All Communications are to be made to:

Branch Manager; and Regional Manager.

14. 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.



15. 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
24/06/2021	Steve Morrissey, Louis Samoa, Juan Van Jaarsveld & Christina Lynas	Desktop Test	No major findings identified.	June 2022
20/06/2022	Nick Whitehead & Benjamin Harvey	Desktop Test	No major findings identified.	June 2023
11/07/2023	Louis Samoa and Joanna Parrag	Desktop	N/A	July 2024
1/07/2024	Louis Soma, Steve Morrissey and Greg Delaney	Drill	No major findings identified.	July 2025