

**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN – (PIRMP)**

**Cleanaway Operations Pty Ltd
Padstow**

***12 – 14 Stuart St
Padstow NSW 2211***

EPA LICENCE NO. 2977

Revision Status:

Date	Issue	By	Checked	Approved and understood by
26/08/2021	1	Previous Version / Template of the PIRMP		
19/08/2022	2	HR	DC	DC
01/08/2023	3	NA/HR	DC/DS	DC/DS
07/02/2024	4	HR	Minor Update	HL
09/08/2024	5	NA	HL/DS	HL/DS

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

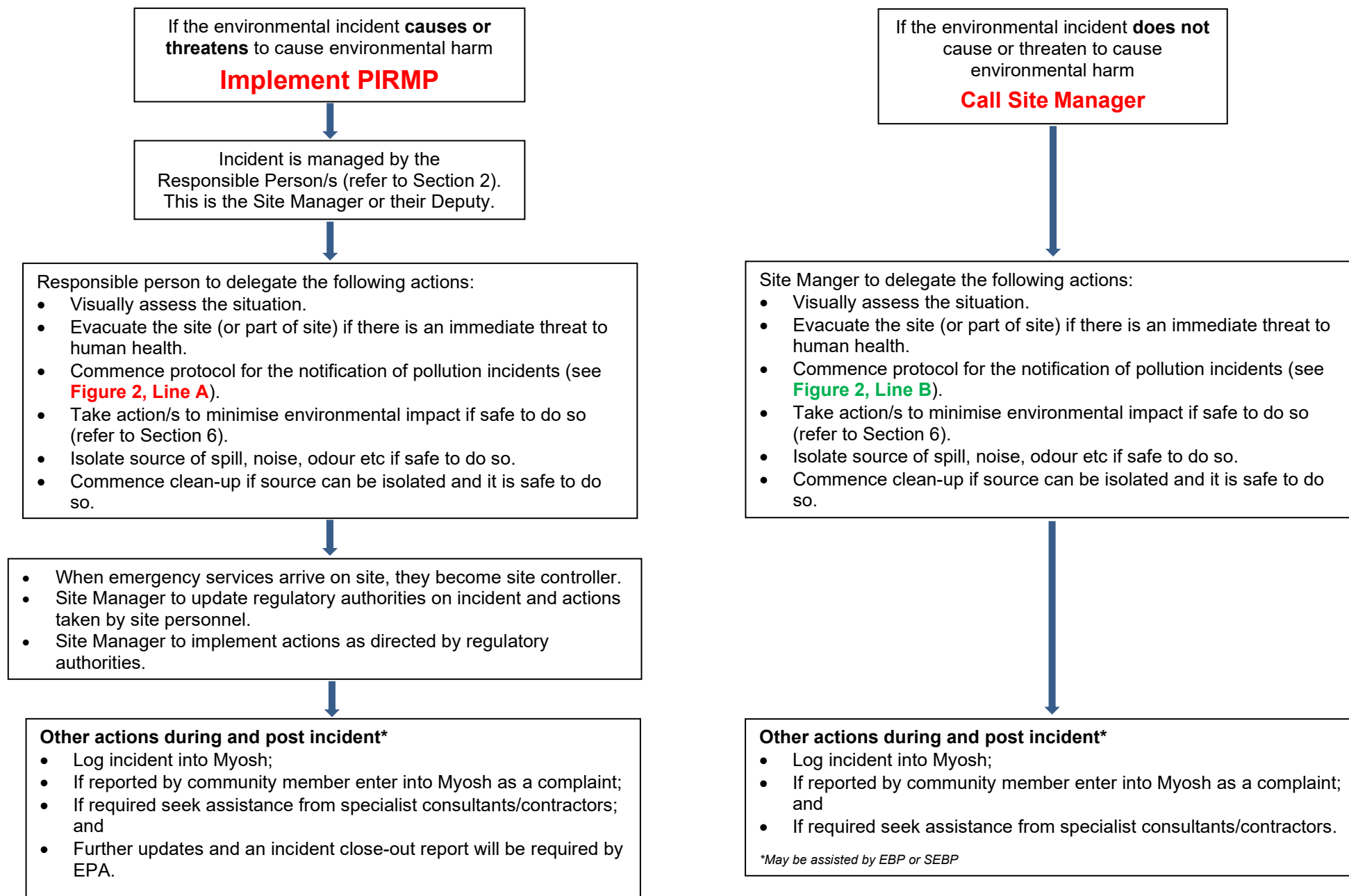
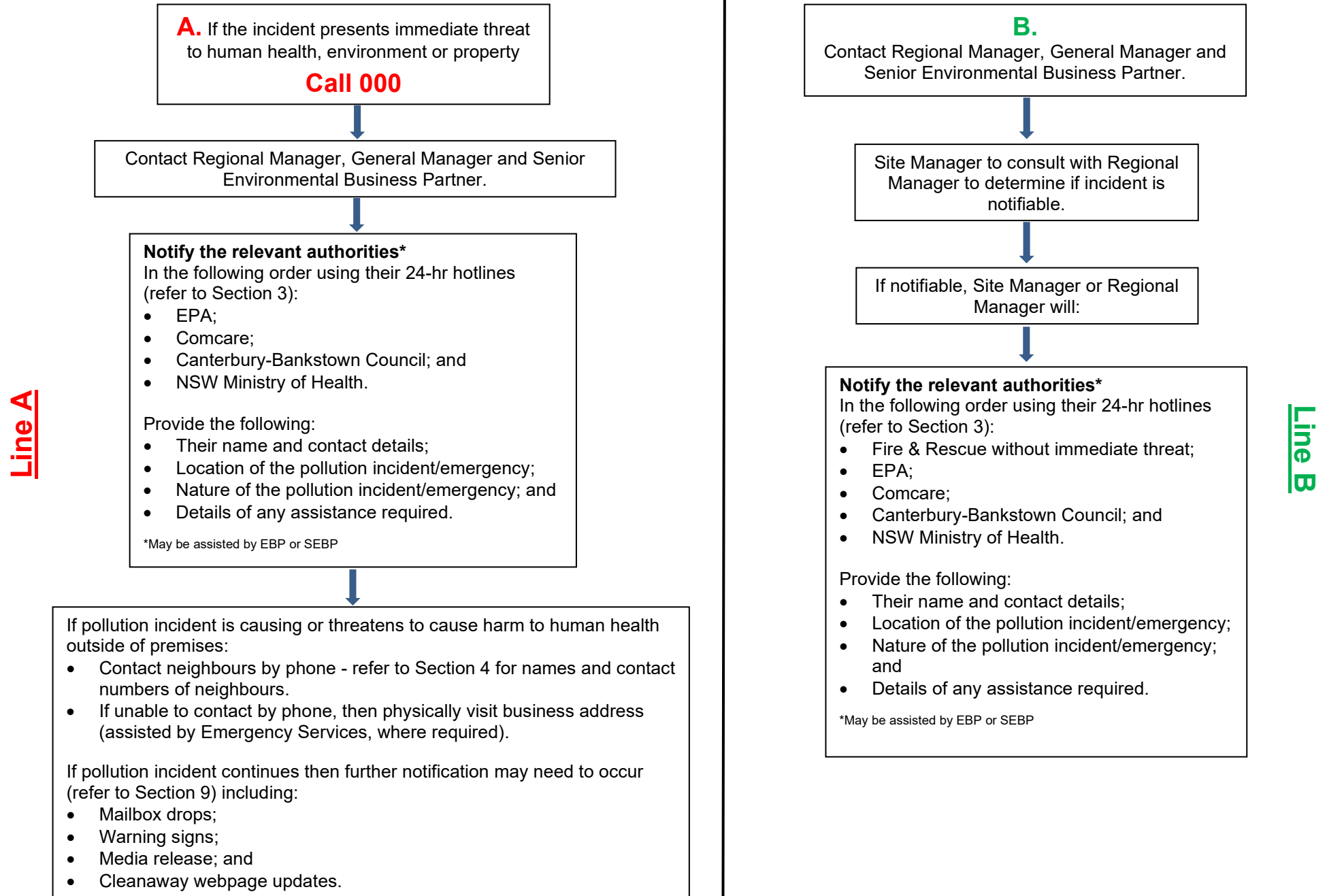


Figure 2 outlines the Cleanaway protocol for the notification of pollution incidents



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) – LTS Padstow

Approved by: Name: Hamilton Loureiro

Position/Title: Branch Manager

Date: 09/08/24

PURPOSE:

Cleanaway Operations Pty Ltd (Cleanaway) holds an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for the LTS Padstow 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 the **LTS Padstow** site 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:** Plant office, Lunchroom and Main 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/>

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.

Licencees 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:

- LTS Padstow Site Emergency Management Plan (HSE PL 2.1.3.01.01)
- LTS Padstow 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: (including ABN)	Cleanaway Operations Pty Limited 40 010 745 383
EPL number:	2977
Premises name and address:	Cleanaway Operations Pty Ltd 12 – 14 Stuart St Padstow NSW 2211
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 Processing (non-thermal treatment); Waste Storage.
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.

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	1300 066 055
Comcare <i>(see note below)</i>	1300 366 979
Local authority (Canterbury-Bankstown Council)	(02) 9707 9000

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
D & D Smith	(02) 9771 6864
Bowles Joinery	(02) 8764 3528
Aus Gold Leaf Pty	(02) 9792 8288
Foseco Pty Ltd	(02) 9914 5500
High Technology Control	(02) 9771 4088
D&S Harrington Pty Ltd / DSH Global Logistics	(02) 9771 6611
Rock Build Developments	(02) 9793 8464
Other Potentially Affected Neighbours	Notify potentially affected neighbours in conjunction with Fire Brigade notification system

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. 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 <https://www.cbcity.nsw.gov.au/>

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

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.

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

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
24/08/2021	Hamilton Loureiro, Nathan Kempton, Dennis Salafia & Haydn Rossback	Desktop - drill	N/A	August 2023
16/07/2022	Padstow Operational Team	Incident Response – Spill Incident (Contained & Cleaned up)	N/A	July 2023
01/08/2023	Daniel Collins, Dennis Salafi & Nana Amankwah	Desktop/Drill	N/A	August 2024
31/07/2024	Hamilton Loureiro, Dennis Salafi & Nana Amankwah	Drill	Learnings in Myosh	July 2025