

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN EPA LICENSE # 20444

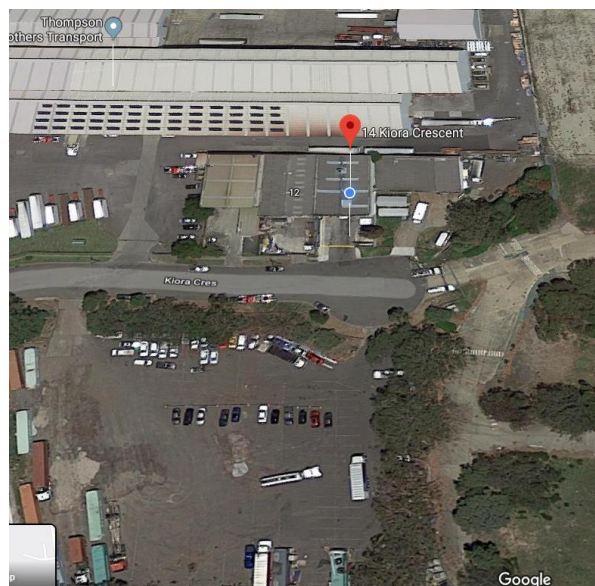


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PIRMP was prepared in line with EPA Environmental Guidelines setting out specific requirements regarding the preparing, keeping and implementation of this plan.

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1. Purpose and Scope

The purpose of the PIRMP is to ensure compliance with the requirements of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act)2.

This Pollution Incident Response Management Plan (PIRMP) has been developed to describe response to a potential pollution incident of **Enviro Waste Services Group** and to meet the requirements of the Protection of the Environment Operations Act (POEO Act 1997).

The PIRMP covers the **property at 14-16 Kiora Crescent, YENNORA**

The plan covers description of potential hazards, actions to be taken to prevent additional environmental harm and details of communication required in the event of an incident.

The plan is based on a risk assessment of the site.

2. Facility and Process Details

Enviro Waste Services Group Pty Ltd is an Australian owned and operated Company.

We are specialised in treatment of various wastes and as listed and described on the license.

<https://apps.epa.nsw.gov.au/prpoeoapp/ViewPOEOLicence.aspx?DOCID=114634&SYSUID=1&LICID=20444>

- Grease traps
- Septic/sewer
- Stormwater pits
- Oily Water

The waste is stored in the relevant tanks while it gets treated and is ready to be disposed off.

The surrounding area which may potentially be impacted by a pollution incident occurring at Enviro Waste, in addition to the premises itself, may include the following:

- ✓ Landholders adjacent to Enviro
- ✓ Kiora Crescent- (if waste runs into the sediment control pit)

3. Chemicals and Pollutants

3.1 At Enviro, there are no chemicals held on site in a volume that may cause potential pollution.

3.2 Enviro Facility that store liquid waste, has been designed in accordance with regulations:

- 3.2.1- Tanks are designed with corrosion resistance and long life time;
- 3.2.2- Where tanks are located, the area is surrounded with 400mm bund wall.
- 3.2.3- Two humps built in the factory.

4. Definition of Pollution Incident

The definition of “pollution incident” means an incident or set of circumstances during or because of which there is likely to be a leak, spill or other escape or deposit of a substance because 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 a premise, but it does not include an incident of circumstances involving the emission of any noise.

5. Description and Likelihood of Hazards /Pollution Identification

Following containment of the incident, immediate action must be taken to determine if the incident can be classified as a ‘material harm incident’.

Due to the nature of the business, the products that are stored and used onsite are considered potential pollutants.

Even though the utmost care is taken when dealing with such pollutants, there has been measures in place to ensure the correct procedure is used to deal with any accidents that may occur.

At Enviro Waste Services Group Pty Ltd, the following may be potential pollutants:

6. Hazards Identification & Prevention:

Chemical Name	Hazards Identified	Precaution
Degreaser	Severe burns, risk of damage to eyes, may cause respiratory irritation	Avoid contact with skin and eyes. Protective clothing, gloves & masks must be worn
Hydrated Lime	Irritating to eyes, respiratory system and skin	Avoid contact with skin and eyes. Protective clothing, gloves & masks must be worn
Liquid Waste	Irritating to eyes, respiratory system and skin	Avoid contact with skin and eyes. Protective clothing, gloves & masks must be worn.

7. Pollution Prevention

- 7.1 (A)- **400mm bund wall around the area** where tanks are located.
- (B)- **Hump is built at the main roller door** to prevent liquid waste from running outside factory boundary and another (C)- **hump in the middle of the factory**.
- (D)- **Surface water Grate Drain System** at the end of the driveway with a hump built behind to prevent any liquid waste from running onto Crescent street.



7.1- (D)- Grate Drain System-Ed of Driveway



7.1- (B) & (C)- Hump at end and middle of factory

8. Pre-Emptive Action

Failure of Containment Tanks

In the event of this occurring:

- Shut off the valve,
- Employees will vacate the premises.
- The correct Authorities will be notified.

Depending on the incident that may occur, the correct action will be taken to clean up and remove any hazards.

In the case of spills, a Vacuum truck will be used to suck up the waste/spill.

9. Transportation of Waste

All transporters of liquid waste comply with the following regulations to avoid any incidents occurring in relation to transporting of liquid waste:

- The transportation of waste must be carried out in a manner that avoids the spillage of waste
- Any vehicle or plant used for the transportation of the waste are constructed and maintained to prevent spillage of the waste
- Any container used to transport the waste is secured safely on the vehicle used for the transportation of waste.
- Incompatible waste will not be mixed or transported together
- Liquid waste must not be mixed with other wastes
- The waste must be able to be sampled by the release of suitable and accessible valves on the top and where appropriate bottom of any container used to transport the waste

10. Spill Response

There may be a risk of spills and contamination of surface during transportation of liquid waste.

- All trucks are loaded and unloaded within a bundy area to prevent any spills from spreading.
- If an incident were to occur during the transportation of waste, a spill kit will be used and if necessary, emergency contacts will be notified.

11. Incident Response Plan

This section provides details in which will be used in the event of an incident that has resulted in a material impact to the environment and/or human health.

It will also include communication in which will be used to notify Emergency Services and surrounding neighbours.

12. Pollution Incident Response Steps

In the case of an environmental incident, prior to any other action, the site must **contact 000 if the incident presents an immediate threat to human health or property.**

All possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- a. Provide for the safety of people at and within the vicinity of the site; and
- b. Contain the pollution incident.

In the event of a pollution incident the risk of harm to human health will be minimised by engaging an appropriate pollution response as outlined below

1. Stop the source: If it's safe to do so, stop the process causing the spill/leak or other environmental incident.

2. Isolate the area: The first person to notice the spill or leak should remove themselves from the immediate area and take measures such as barricading the area to reduce the risk of exposure to others. This must occur without exposure to danger.

3. Commence early notification: The Manager or Supervisor must be notified immediately of the environmental incident.

They in turn must immediately inform one of the persons nominated for notification of Authorities. If the environmental incident is significant, the nominated person implements early notification procedures to the relevant Authorities including emergency services.

Alerting the potentially affected neighbours may also be required, with regular updates provided as needed.

4. Provide a 1st aid response (if required): Emergency shower is available in the blending shed, near the door. Eye wash is located in the lunchroom. Appropriate PPE is worn by all staff during periods of potential exposure as outlined in relevant Safety Data Sheet (SDS).

13. Managing Response and Legal Duties

- a. All Employees and Contractors are responsible for alerting management personnel to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale.
- b. Notification responsibilities are detailed in the POEO Act (Section 148), which encompasses all site personnel, including contractors and sub-contractors. These can be categorised broadly as:
 - ✓ The duty of an employee or any person undertaking an activity:
 - ✓ Any person engaged as an **employee or undertaking an activity must, immediately after becoming aware of any potential incident, notify their relevant manager of the incident and all relevant information about it.**

c. The duty of the employer or occupier of a premises to notify:

- ✓ An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake notification to the appropriate regulatory authority of any “material harm incidents”, including relevant information.
- ✓ Notification shall be undertaken by the Environment and Community Manager or Operations Manager

For further details on reporting environmental incidents, including updated contact details and the duty
All incidents are to be reported to the General Manager or Director immediately.

Key Contact	Position	Contact Number
Eddy Hawach	Managing Director	0420 511 727
Simon Saba	General Manager	0467 777 646
John Paul Hawach	Operations Manager	0405 583 332
Tony Salloum	Safety & Compliance Manager	0448 218 214

14. Details for the appropriate relevant Authorities

Notifying relevant authorities In the event of an incident which material harm to the environment is caused or threatened, Enviro will immediately notify the following authorities:

Ambulance, Fire or Police	000
Guildford Fire Station	9632 6856
Environment Protection Authority	131 555
Work Cover Authority	13 10 50
Environmental Protection Authority	131 555
SafeWork NSW	131 050

15. Duty to Notify

Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- a) an employee carrying on the activity relating to the pollution incident
- b) an employer after

- c) becoming aware of a pollution incident
- d) the occupier of the premises where the pollution incident occurs. Notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

16. A pollution incident is required to be notified if there is a risk of “material Harm to the environment” which is defined in Section 147 of the PEOA as:

- a) Harm to the environment is material if:
 - i) It involves actual or potential harm to the health & safety of human beings or to the ecosystems that is not trivial
 - ii) It results in actual or loss of property damage to an amount, or amounts in aggregate, exceeding \$10,000 (or such amount as is prescribed by the regulations) and
- b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Inventory of possible pollutants

PRODUCT NAME	LOCATION OF STORAGE	MAXIMUM QTY STORED
Degreaser	In an IBC in bundied area	1000 litres
Hydrated Lime	On a pallet in bundied area	800 kg

Safety Data Sheets for these chemicals are displayed in the Warehouse.

Potential Hazard	Likelihood
Degreaser	Low
Hydrated Lime	Low

Information to be notified to the authorities:

- The time, date, nature, duration and location of the incident.
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred, including the cause of the incident, if known;
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and Other information prescribed by the regulations.

17. Availability of the PIRMP

- The PIRMP shall be kept in written and electronic form at the Enviro Waste premises.
- Shall be made available to all personnel responsible for implementing the plan, and to an authorised officer, as defined in the POEO Act on request.

Hard copies of the PIRMP will be kept at the following locations:

- Main Office next to the treatment facility,

18. Details for Surrounding Neighbours

Contact details are as follows:

SBN Building Construction	0425 838 116
Enviro Product Destruction	02 9721 2028
J.B Manufacturing	9632 9158

In the event of an Emergency, our neighbours will be notified immediately via phone and/or message if unable to contact them directly on their site. Enviro Waste Services Group will consult with the above contacts in relation to the incident that has occurred.

19. Maps

A detailed hard copy of the map showing the location of the premises, the surrounding area which is likely to be affected by a pollution incident and the location of potential pollutants on the premises as well as stormwater drains on the premises is available on site (and as an attachment to this document).

20. Staff Training/Awareness

All Enviro Waste Services Group employees will receive explanation on all relevant information contained in our PIRMP. This will be communicated during our regular staff meeting.

For all new employees, the information will also be explained upon induction.

All employees are made aware of the requirements in this plan and are encouraged to enforce all regulations and safety procedures to minimise any incidents that may occur on site at all times.

Details of this plan are also provided to the key contacts on and off site and a hard copy is available in the Main Office upon request.

21. Testing and Review

The testing of our PIRMP will be undertaken to ensure that the information provided is accurate and up to date.

This will take place on a 12-month basis. However, contact details and other such relevant details will be regularly updated when & if required.

The PIRMP will be tested either through.

- a desktop analysis or an environmental emergency drill; and
- The PIRMP will be tested and reviewed within 30 days of any reportable pollution incident

Also, a practical exercise will be implemented to ensure all employees understand the nature of PIRMP and to ensure correct procedures are followed.

Records of all training will be kept on file in the main office.

It will detail:

- The procedure in which the test was managed
- Dates in which the test was performed
- The details of the person who carried out the testing
- The details (date, description etc) of any amendments or updates made to our PIRMP

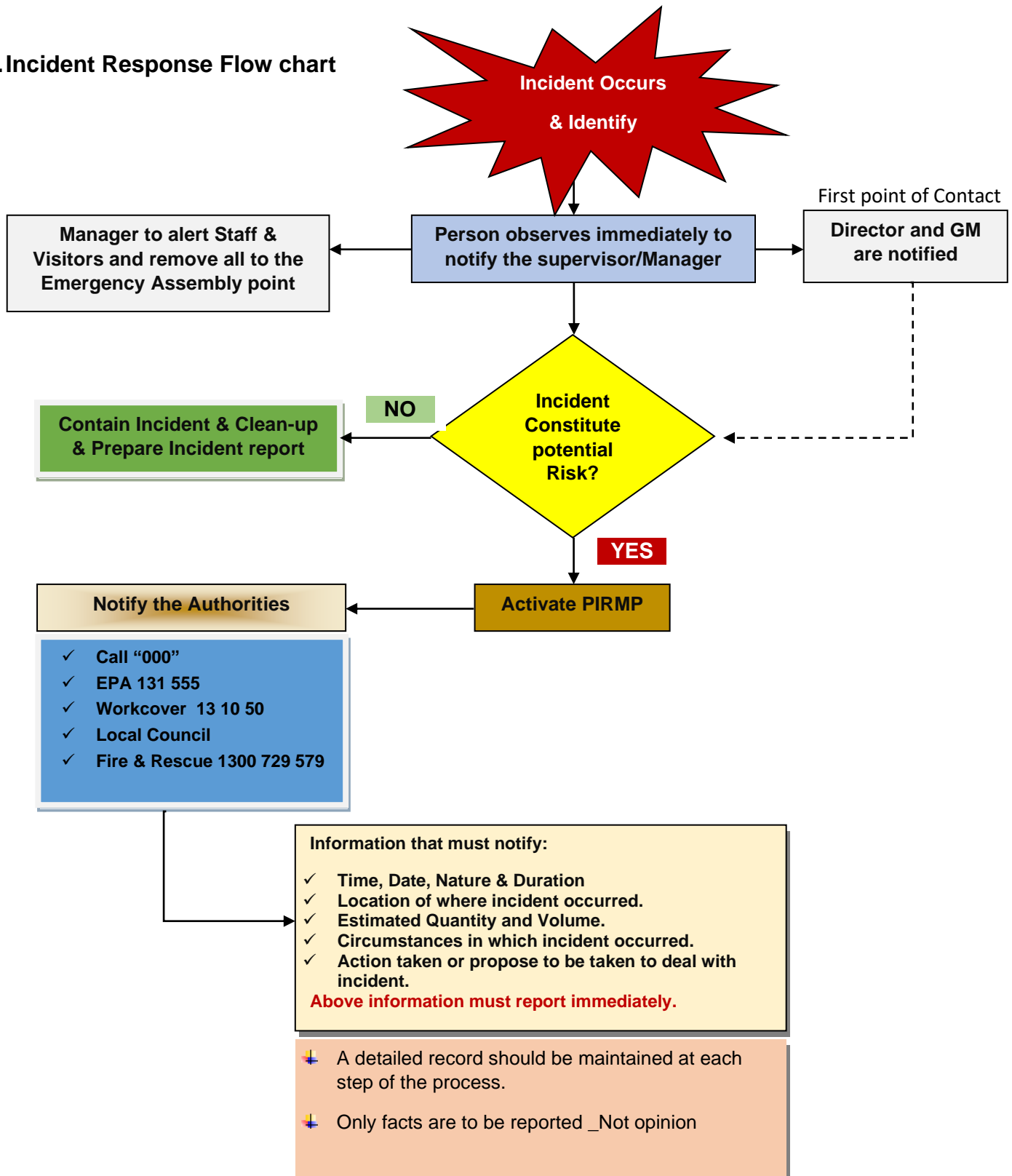
Test record

Date	Name	Description

22. Definitions

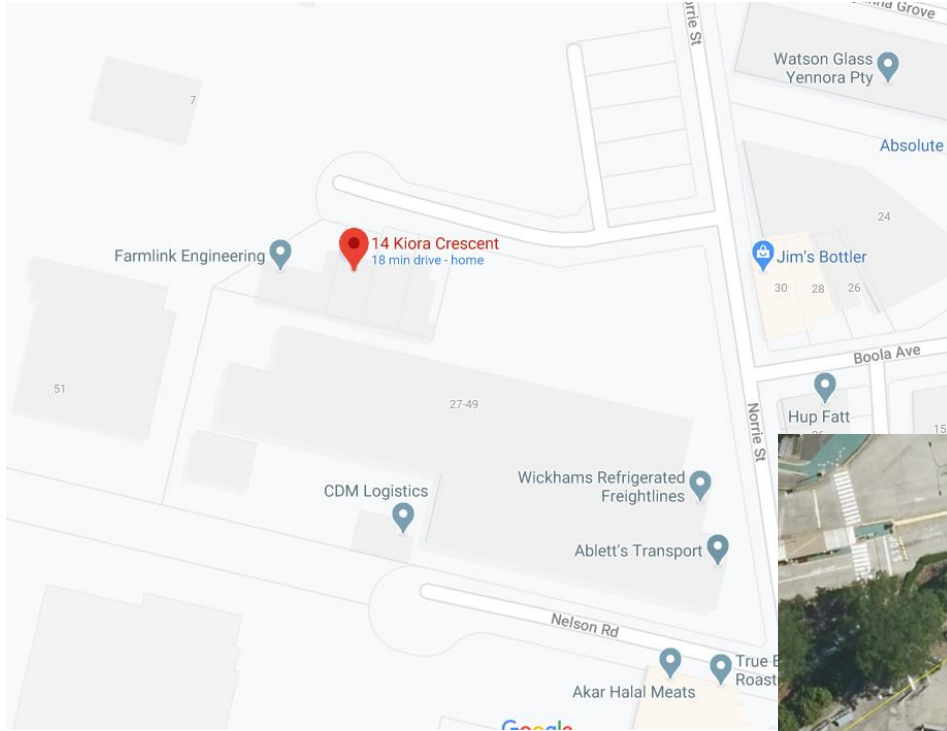
Term	Definition
EPA	Environment Protection Authority
EPL	Environmental Protection Licence
PELA	Protection of the Environment Legislation Amendment Act 2011
POEO	Protection of the Environment Operations Act 1997
POEO(G)	Protection of the Environment Operations General Regulation 2009
PIRMP	Pollution Incident Response Management Plan

23. Incident Response Flow chart



Location and Surrounding Neighbours

14 Kiora Crescent, YENNORA



14 Kiora Crescent, Yennora NSW Search Map Options Resolution: Current (1259x728) Save Image... X

Get Directions History **EPL #20444**

14 Kiora Crescent Google Earth - New Image Overlay

Name: Untitled Image Overlay

Link: Browse...

Transparency: Clear Opaque

Description	View	Altitude	Refresh	Location
1st Corner:	Longitude: 150.967986°	Latitude: -33.863270°		
2nd Corner:	Longitude: 150.968144°	Latitude: -33.863304°		
3rd Corner:	Longitude: 150.968215°	Latitude: -33.862974°		
4th Corner:	Longitude: 150.968069°	Latitude: -33.862948°		

14 Kiora Cres Enviro Waste Services Group EPL 20444

Responding to Pollution Emergency

In the case of Pollution Incident, the following procedure to be executed:

Immediate actions are required and as quick as possible.

1. Appropriate sandbags to be used. (Sandbags are stored in the Yard next to the green container)
2. **Sandbags marked 1 & 2** (on the diagram) are required to be placed **in their position FIRST**, to minimize the Volume of any pollutant from running in the street into the Drain Water Pit.
3. Place other sandbags in their places, (In order)
4. If needed, place couple of sandbags around the water drain pit (approx.50 meter down the street , right hand side)



	Water Flow Direction
	Sandbag

End of the procedure

Document History

Date	Revision	Changes	Approved
01.03.2020	Ver 02	Adding last page, (Responding to Pollution Emergency)	Tony Salloum
12.05.2021	Ver 02	Pollution Incident Drill -testing the procedure-Successful	Tony Salloum
06.06.2022	Ver 03	Pollution Incident Drill -testing the procedure-Successful	Tony Salloum