

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Cozens
Paper Recycling
Paper, Cardboard, Plastic



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1. General Information

1.1 Introduction

The purpose of this document is to summarize important background information and elements of Cozens Recycling Pty Ltd Incident Response Management Plan for regulators, community, and other interested external parties.

This Plan demonstrates compliance with the new requirements introduced by the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) to prepare and implement a pollution incident response management plan, which is to be kept, tested and implemented in accordance with the Act and the POEO (G) Regulation.

1.2 Site Location

Cozens Recycling Pty Ltd is located at Unit 3/100 Old Pittwater Road Brookvale, within the Local Government Area of Warringah.

A location sketch is attached to this Management Plan.

The site is currently zoned IN 1 General Industry in accordance with Warringah Local Environmental Plan 2011. Unit 3 is one of three units at 100 Old Pittwater Road. The surrounding land uses are essentially industrial complexes, warehousing and commercial developments.

1.3 Proposed Licence

A licence is being sought for the processing of 18,500 tonnes per annum of waste paper, and 300 tonnes of LDPE and HDPE material per annum. At present 9 staff are employed involving 10-20 truck deliveries to the premises per day. The premises operate generally from 5am to 5pm daily.

1.4 Scope

This procedure applies to all personnel that work at Unit 3/100 Old Pittwater Road Brookvale.

1.5 Responsibilities

In relation to the PIRMP, it is the responsibility of the Manager or his delegate to:

- Activate the plan
- Ensure these procedures are implemented.
- Notify relevant authorities.
- Ensure the necessary equipment is purchased and maintained
- Respond to the pollution incident
- Implement these procedures through training of the relevant personnel.

- Review these procedures at least annually or if an incident occurs.
- Report any issues as soon as possible
- Ensure that personnel carry out the requirements of these procedures in the event of an incident.

SIMON COZENS IS THE AUTHORIZED PERSON. His contact details are 0413219666.

2.0 Background and legislative requirements

2.1 Introduction

The POELA Act introduces several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement under Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

The objectives of these plans are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW and people outside the facility who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009.

2.2 Definition of a pollution incident

Pollution incident means an incident or set of circumstances during or as a consequence of which, there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result 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 premises, but it does not include an incident or set of circumstances involving only the emission of noise.

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 POEO Act as:

(a) harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other 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.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, Work Cover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

There are also new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.

The potential, albeit not necessarily likely, pollution incidents at Cozens Recycling include:

- Fire
- On-site spills or leaks of fuel, oil or hydraulic fluid that cause or threaten environmental harm, property damage or personal injury
- Truck spills on public roads within or near the site premises which may cause fuel, lubricants or other products to enter the site or threaten to enter water ways

The only Hazardous Substances or Dangerous Goods stored on site at Unit 3/100 Old Pittwater Road is engine oil , Hydraulic oil and a 20 litre container of diesel which is stored in a bundied safety container separate to the main building.

The main hazard however is considered to be fire, mainly generated on site.

3.0 Emergency Response Procedures

The PIRMP also provide notification procedures as required by the POEO Act and the (POEO (G) Regulation). These include:

AGENCY	CONTACT NUMBER
NSW Fire /Ambulance/Police	000
EPA	131 555
Safe Work NSW	131050
Warringah Council	99422111
Manly Hospital	9976 9611

In case of pollution incidents or bushfire that may potentially pose a threat to health or safety of the neighbours the nearby residents will be notified.

4.0 Safety Equipment

Safety equipment includes

- Spill kits
- Fire Extinguishers
- Fire Hydrant / Hose

5.0 Fire PIRMP

A fire PIRMP is at **Appendix A** to this report

6.0 Spill Prevention and Control

The surface facilities of Cozens Recycling, operates as a nil discharge site.

Surface fire fighting systems operate on a secure reticulated water supply system.

All fuel and oil storages are fully secured and undercover to avoid contamination with rainwater. In the event of fire, excess fire fighting water would also be contained within the existing pollution control system. The risk of offsite pollution event is considered low.

The spill emergency PIRMP is at **Appendix B** to this report.

7.0 Testing and implementation

Clause 98E of the Regulations (Testing of plan), provides as follows:

- (1) *The testing of a plan 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 the plan is capable of being implemented in a workable and effective manner.*
- (2) *Any such test is to be carried out:*
 - (a) *routinely at least once every 12 months, and*
 - (b) *within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.*

The manager or his delegate is responsible for ensuring that emergency systems are maintained and that their effectiveness is evaluated at least once a year.

8.0 Pollution Incident Notification Procedures

8.1 Notification of relevant authorities

Any pollution incident that causes or threatens “material harm” to the environment or people will be notified to government authorities immediately upon becoming aware of the incident.

When new information comes to hand following the initial notification, this information must also be communicated immediately.

Only the manager or his delegate is authorised to make these notifications.

8.2 Communicating with neighbours and local community

In case of pollution incidents that may potentially pose threat to the health and safety of the Neighbours, the neighbours will be urgently notified.

For this reason the emergency procedures listed in the PIRMP include instructions on when and how to communicate pollution events with the local community. These include:

- 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 and estimated quantity or volume and the concentration of any 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.
- Other information as may be required by the regulations.

The Manager or his delegate will undertake the early warning of the neighbourhood in the first instance by phone.

The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do.

For example:

- Due to a fire on site, we are experiencing elevated emissions from the site. Please keep your doors and windows closed until further notice.
- An accidental discharge occurred from the site. There may be emergency vehicles using Old Pittwater Road.
- Due to a diesel spillage onto a street from the site, a cleanup operation is being organised. Please be watchful for road closures in relation to this operation.

Follow up information on the resolution of emergency situation would be timely conducted also on the telephone. If required, further information would be disseminated by means of leaflets in a letterbox drop.

In case of a bushfire, smoke, and explosions the site personnel will work together with fire brigade, police and SES to alert potentially affected neighbours and if necessary arrange evacuation.

8.3 Action to be taken during or immediately after a pollution incident

Emergency Procedure SP-HSSE-025 IS will be followed in relation to the evacuation of personnel if necessary during a pollution incident.

If emergency services are required to be called, this will be completed by the Manager or his delegate.

If it is safe to do so, personnel who are trained in the required process will try to stop/contain any incident which may occur.

A debrief session will be held once the incident has been contained, to review the incident, outcome and where necessary put in place additional mitigation measures as may be required, including a review of the PRIMP.

9.0 Staff Training.

Cozens Recycling personnel will be trained in the pollution response plan. Training will occur on an annual basis and /or more frequent if the necessity arises to do so.

10.0 Availability of PIRMP

Clause 98D (Availability of plan) of the Regulations provide as follows:

- (1) *A plan is to be made readily available:*
 - (a) *to an authorised officer on request, and*
 - (b) *at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.*
- (2) *A plan is also to be made publicly available in the following manner within 14 days after it is prepared:*
 - (a) *in a prominent position on a publicly accessible website of the person who is required to prepare the plan,*
 - (b) *if the person does not have such a website—by providing a copy of the plan, without charge, to any person who makes a written request for a copy.*
- (3) *Subclause (2) applies only in relation to that part of a plan that includes the information required under:*
 - (a) *section 153C (a) of the Act, and*
 - (b) *clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).*
- (4) *Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).*

The PIRMP will be made available as provided for in Clause 98D.

11.0 Records

The following records will be kept in relation to the PIRMP;

- Record of incident.
- Record of notifying the relevant agencies.
- Environmental Information request form
- Training records
- PIRMP plans.

12.0 References

- EPA Website

13.0 Revision History

14.0 Review and Approval

15.0 Compliance Assessment

APPENDIX A

FIRE EMERGENCY PIRMP

IN THE EVENT OF A FIRE	
STEP	OPERATION INSTRUCTION
1	Alert others in the area of the fire.
2	Move away from the fire affected area immediately.
3	Notify the Manager or his delegate.
4	If deemed necessary Manager or delegate will activate alarm.
5	Notify First Aider if there is an injured person.
6	Manager or delegate to contain small fires, if safe to do so.
7	Personnel are to evacuate and proceed to the Emergency Assembly Point.
8	Follow instructions of Manager or his delegate
9	Close non escape doors as you leave
10	No person to re-enter the premises under any circumstance until the emergency services have deemed it safe to do so. The manager or his delegate will advise you when it is safe to do so.
11	Investigate the cause of each incident and ensure that precautionary action is implemented to reduce the risk of a similar incident occurring.

APPENDIX B

SPILL EMERGENCY PIRMP

STEP	OPERATION INSTRUCTION
1	Attend to the spill immediately, no matter how small.
2	If it is safe to do so, STOP the spill at its source.
3	Use spill control and absorbent materials over the entire spill area to contain the spill, if it is safe to do so.
4	Report spill to Manager or his delegate.
5	Ensure that any absorbent material and other equipment used to clean up spills are disposed of appropriately.
6	While spills should be hosed away, any water used for cleaning up and decontaminating spills needs to be treated as contaminated waste water and should not be allowed to enter stormwater drains or watercourses.
7	Spills should be covered and protected from stormwater runoff during rainfall to the extent that it does not compromise cleanup activities.
8	Contact NSW Fire 000 immediately if the spill involves a hazardous substance or if you suspect that the spill will escape into the environment.
9	Record all incidents of spills and ensure that they are reported to the Manager or his delegate.
10	Investigate the cause of each spill and ensure that precautionary action is implemented to reduce the risk of a similar incident occurring.
11	