



Pollution Incident Response Management Plan (PIRMP)

Polytrade Operations Pty Ltd
Enfield Material Recovery Facility

February 2022

Version	Approved by	Date
1	Nathan Ung	May 2018
2	Lucis Han	October 2020
3	Lucis Han	September 2021
4	Nathan Ung	February 2022

OUR CHARTER

We are the only Australian company that designs, builds, owns and operates recycling facilities and systems.

Our Vision

Re.Group's vision is to create a wasteless society, where all materials that are disposed of are recycled or reused.

Our Values



Safety First

We start everything we do with consideration of safety. We work vigorously with our teams to ensure everyone in our team and on our sites are physically and emotionally safe and stay safe



Customer Obsession

Customers are at the heart of everything we do and we are all part of delivering the customer experience.



We Take The 'Waste' Out

We search for more innovative and simpler ways to do everything we do.



Insist On The Highest Standards

We have relentlessly high standards. We continually raise the bar and drive ourselves and our teams to deliver high-quality products, services and processes.



Apply Relentless Grit & Accountability

We always and with no exceptions Do What We Say We Will Do. We don't over promise, our word is our bond, and we deliver every time, on time.



Constantly Curious

We are always asking 'why' to learn and to challenge assumptions.



Celebrate

We love to celebrate the victories and successes of our team with all involved.

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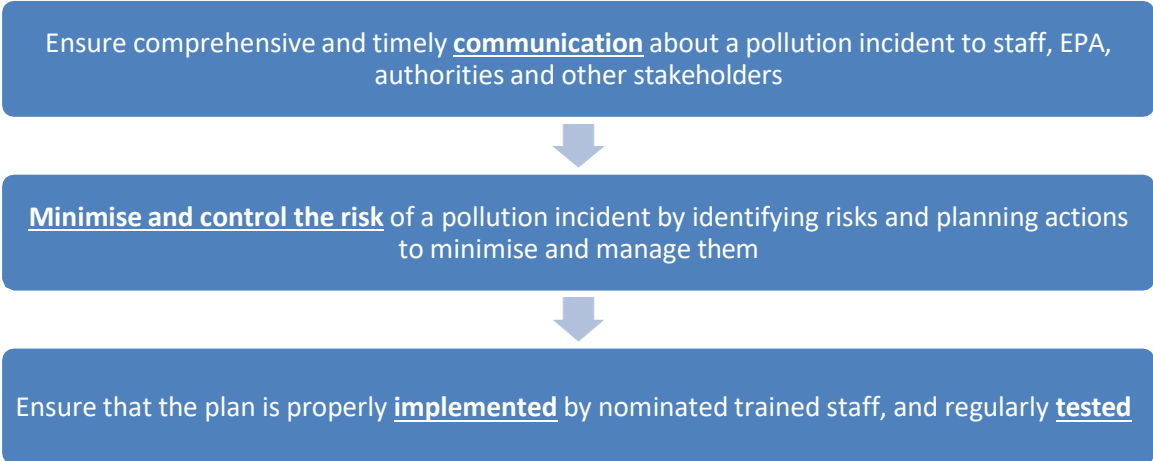
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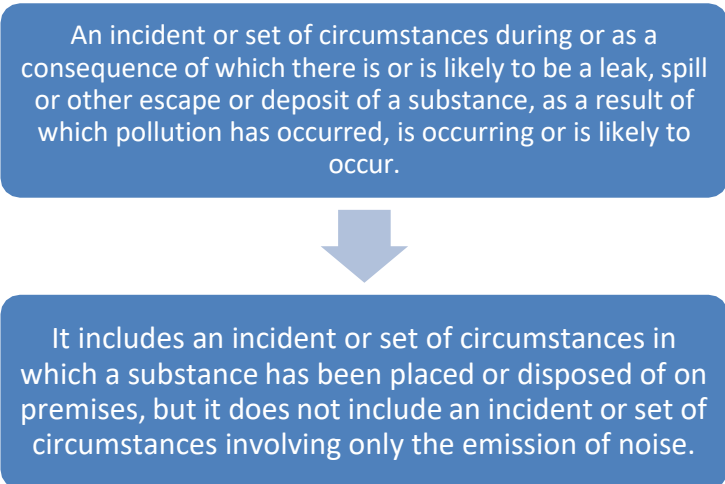
1 Purpose of this plan

Under the NSW Protection of the Environment Operations Act (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, holders of an Environment Protection Licence must prepare and implement a Pollution Incident Response Management Plan (PIRMP).

The objectives of the PIRMP are to:



A “pollution incident” is defined as:



The PIRMP must be:



2 About the site

Address of licenced premises

- 40-42 Madeleine Street, South Strathfield NSW 2136
- LOT 24 DP 1200563

Site ownership

- The site is subject to a long term lease by Polytrade from LC Investments Pty Ltd, which shares a common director with Polytrade.

Local Government Area

- Strathfield

Regulatory Controls

- The site (40 Madeline Street South Strathfield) operates under Development Consent 2015/177 determined by the Sydney East Joint Regional Planning Panel and issued by Strathfield Council on 26 October 2016. The consent permits "use of the site as a waste management facility with an annual capacity of 30,000 tonnes of paper and cardboard and 69,900 tonnes of mixed metals, glass and mixed plastic".
- The site is subject to an Environment Protection Licence 20576, which specifies the allowable scheduled activities as Recovery of General Waste, and Waste Storage - other types of waste. The allowable annual tonnages received are the same as in the Development Consent. The authorised amount of waste permitted on the premises cannot exceed 4,200 tonnes at any one time.

Waste types received

- Separated paper and cardboard from commercial and industrial generators
- Co-mingled recyclables and source separated glass from kerbside, commercial and industrial businesses
- All incoming and outgoing waste is classified as General solid waste - non putrescible as per the NSW EPA Waste Classification Guidelines 2014

Allowable operating hours

- Paper/cardboard operations: 6am to 10pm Monday to Saturday
- MRF processing 5:00am to 10:00pm Monday to Saturday
- Cleaning & Maintenance 10:00pm to 5:00am Monday to Saturday, 10:00pm to 5:00am Saturday to Sunday

2.1 Site location

The site is located at 40 Madeline Street in South Strathfield in inner Sydney, as shown in Figure 1 and Figure 2.

Figure 1 Site location

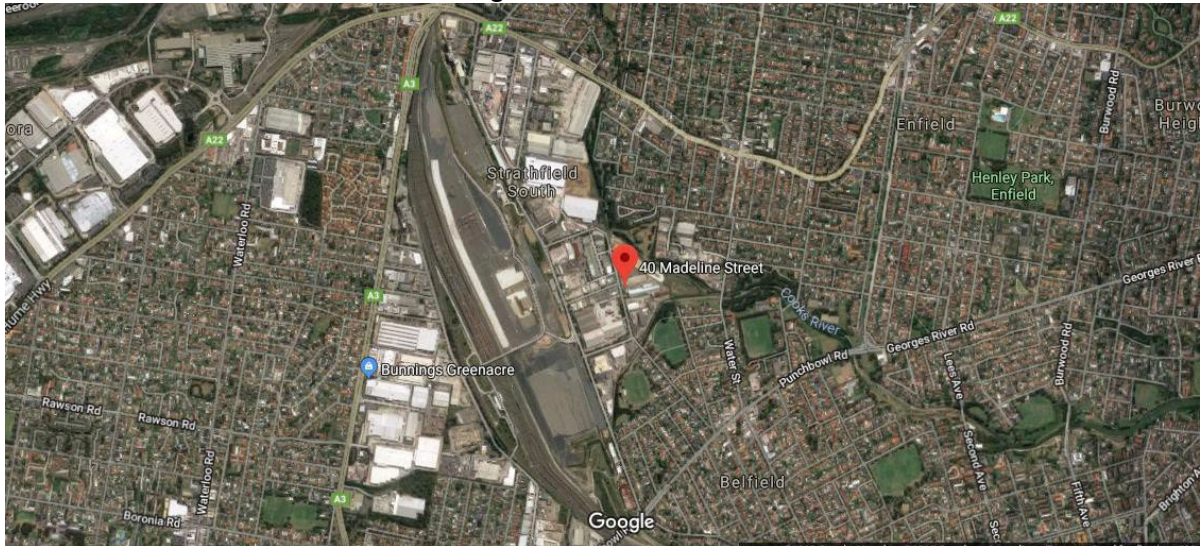
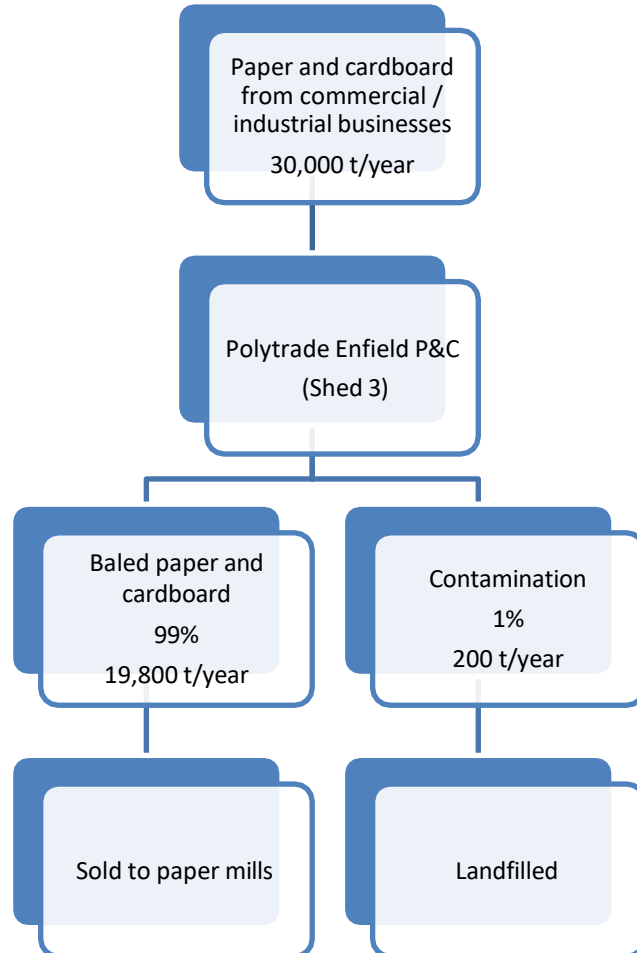


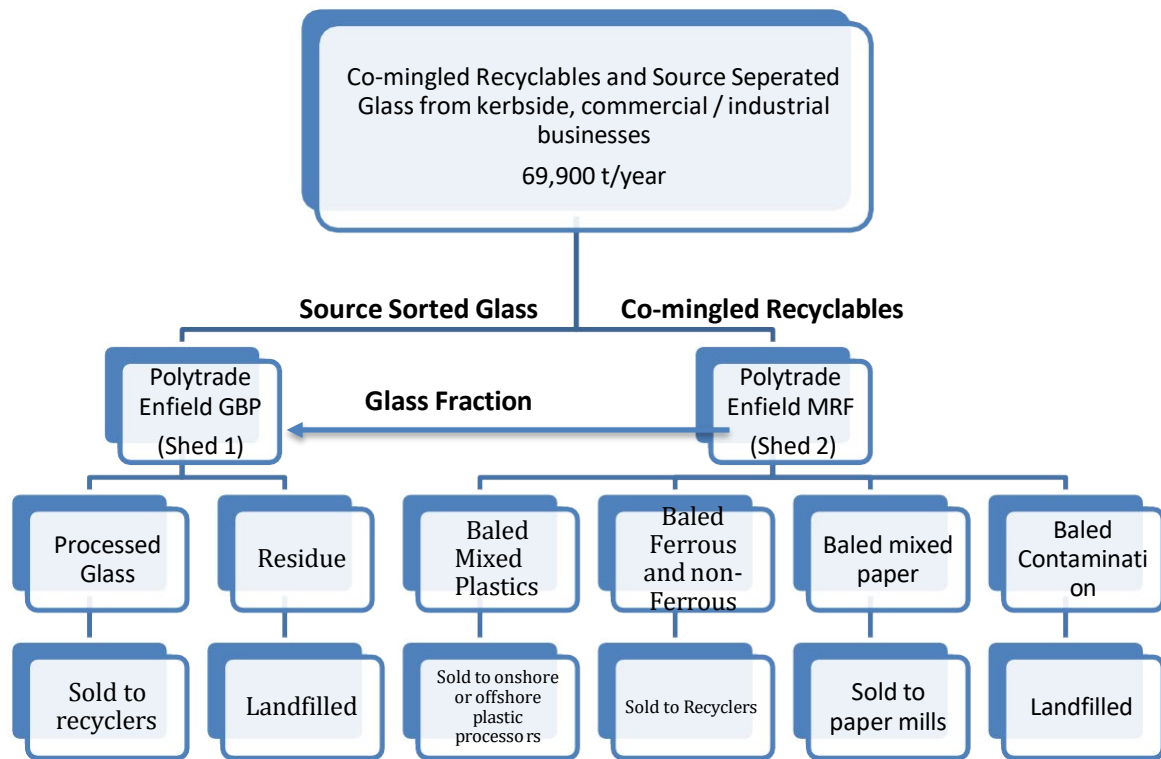
Figure 2 Aerial view of site showing site boundary



2.2 Overview of waste receiveal and processing

Presently only cardboard and paper are received at the site and processed as shown below. The site has consent to build and operate a MRF, Glass Benefaction Plant and Paper & Cardboard recycling. If this new development is undertaken, this PIRMP will be updated accordingly.





2.3 Nearest sensitive receptors

The site is located within an industrial precinct and is zoned IN1 – General Industrial. The nearest residence is approximately 100m away, on the corner of Excelsior and Chisolm Streets at Belfield.

The closest waterway is the Cooks River, east of the site, with drainage to the Cooks River located to the nearby north and south of the site.

Nearest receptors are shown in Figure 3.

Figure 3 Nearest sensitive receptors



Concrete channel drains to Cooks River

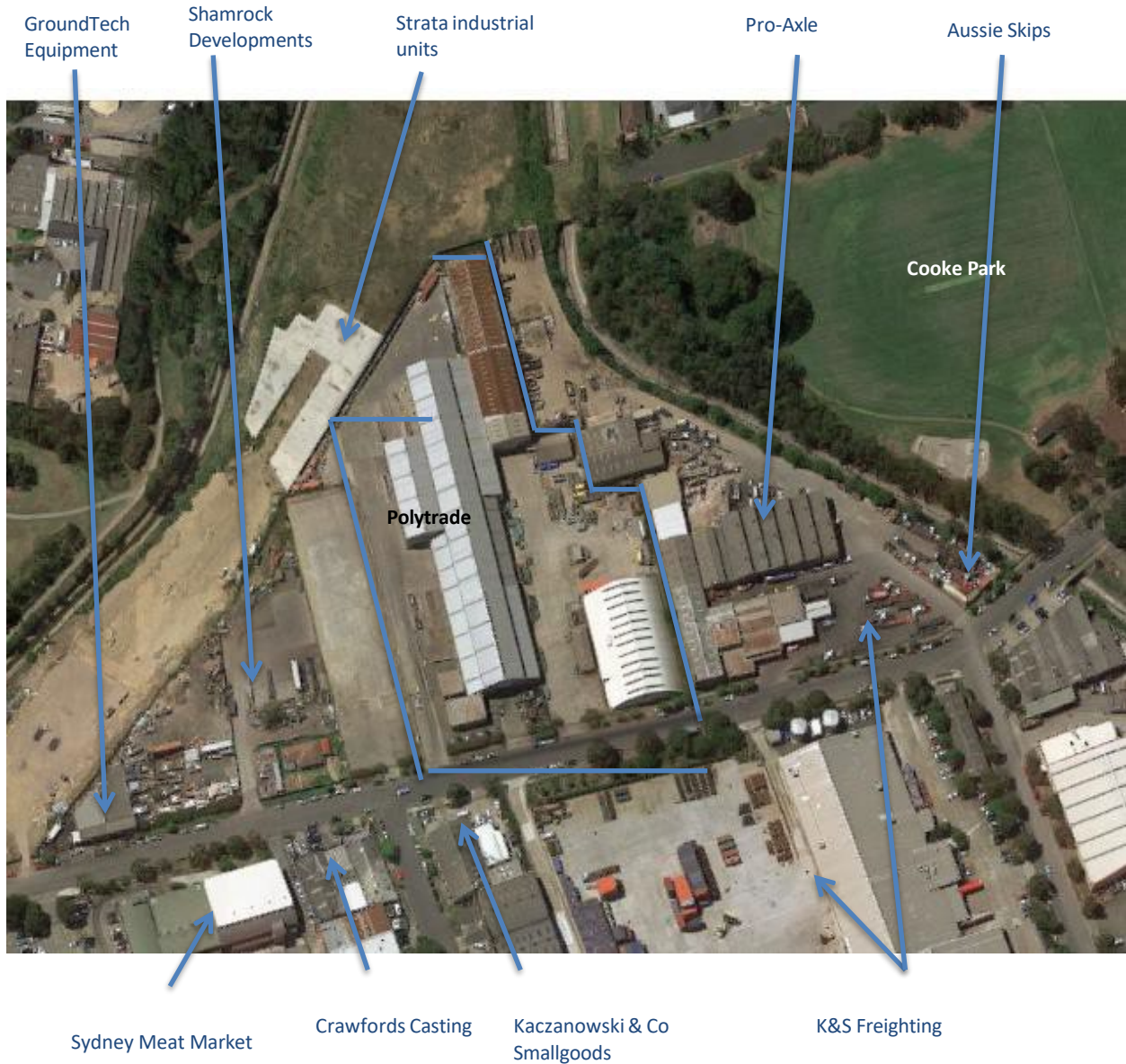
Coxs Creek drains to Cooks River

Nearest residential premises @ 17 Excelsior Street Belfield

2.4 Adjoining premises

The premises adjoining the site are industrial and commercial businesses. Figure 4 below shows the site’s neighbours.

Figure 4 Adjoining premises

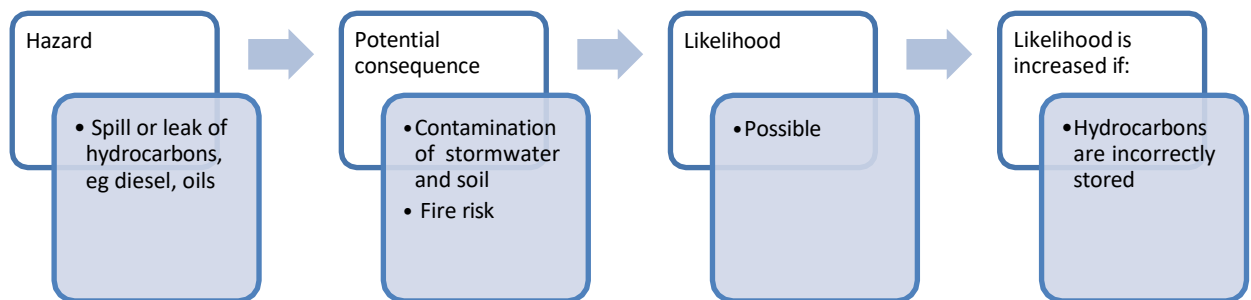
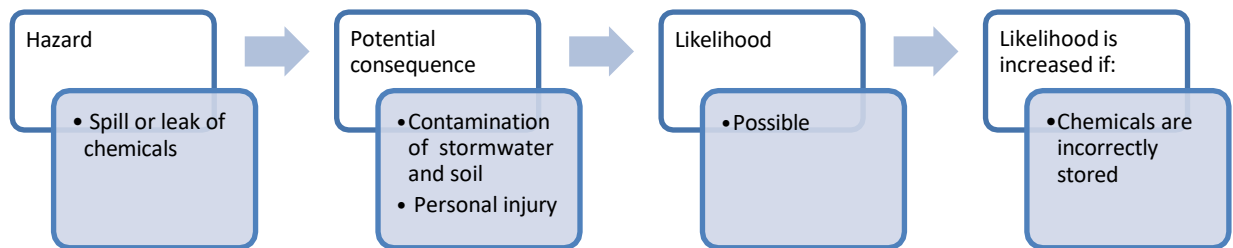
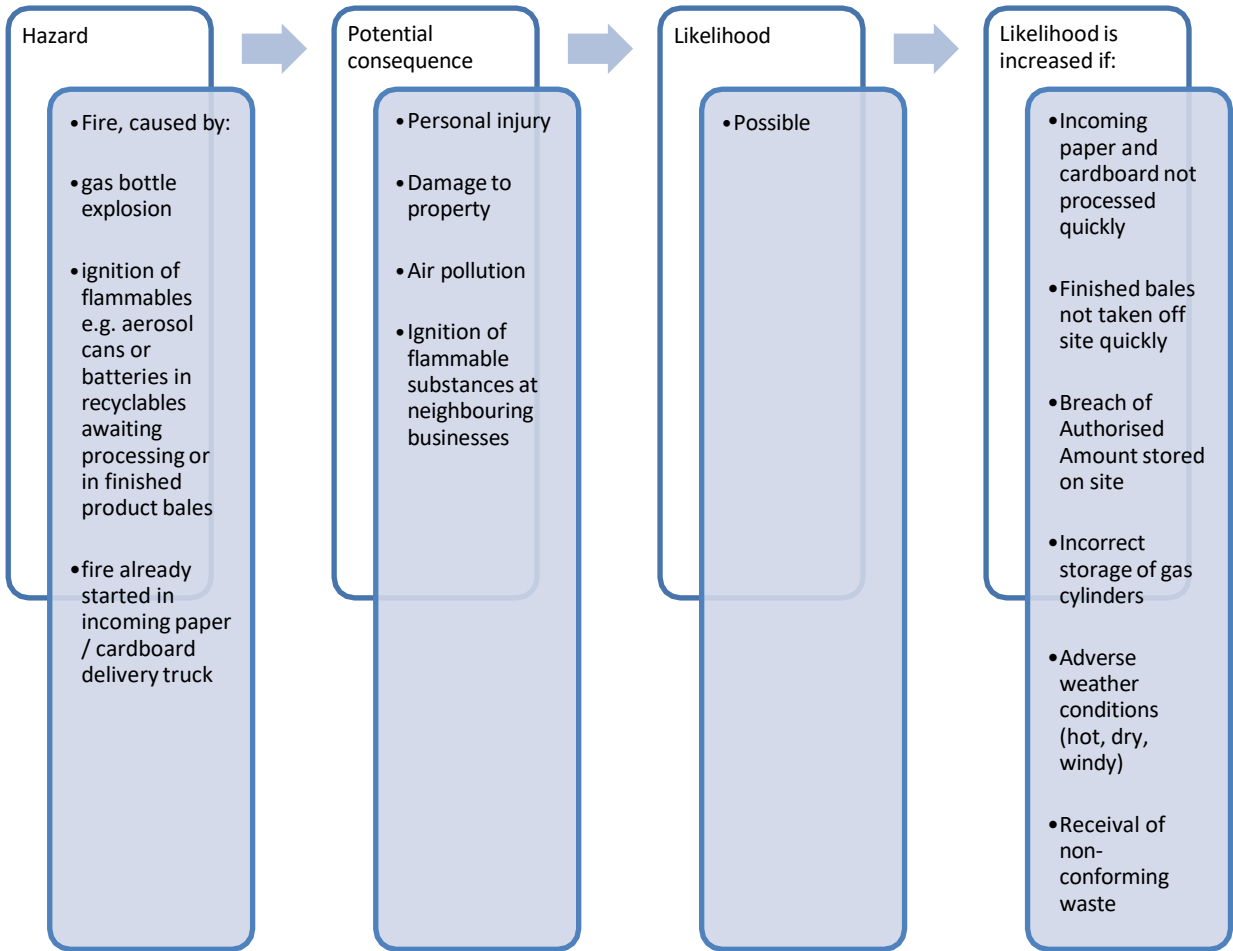


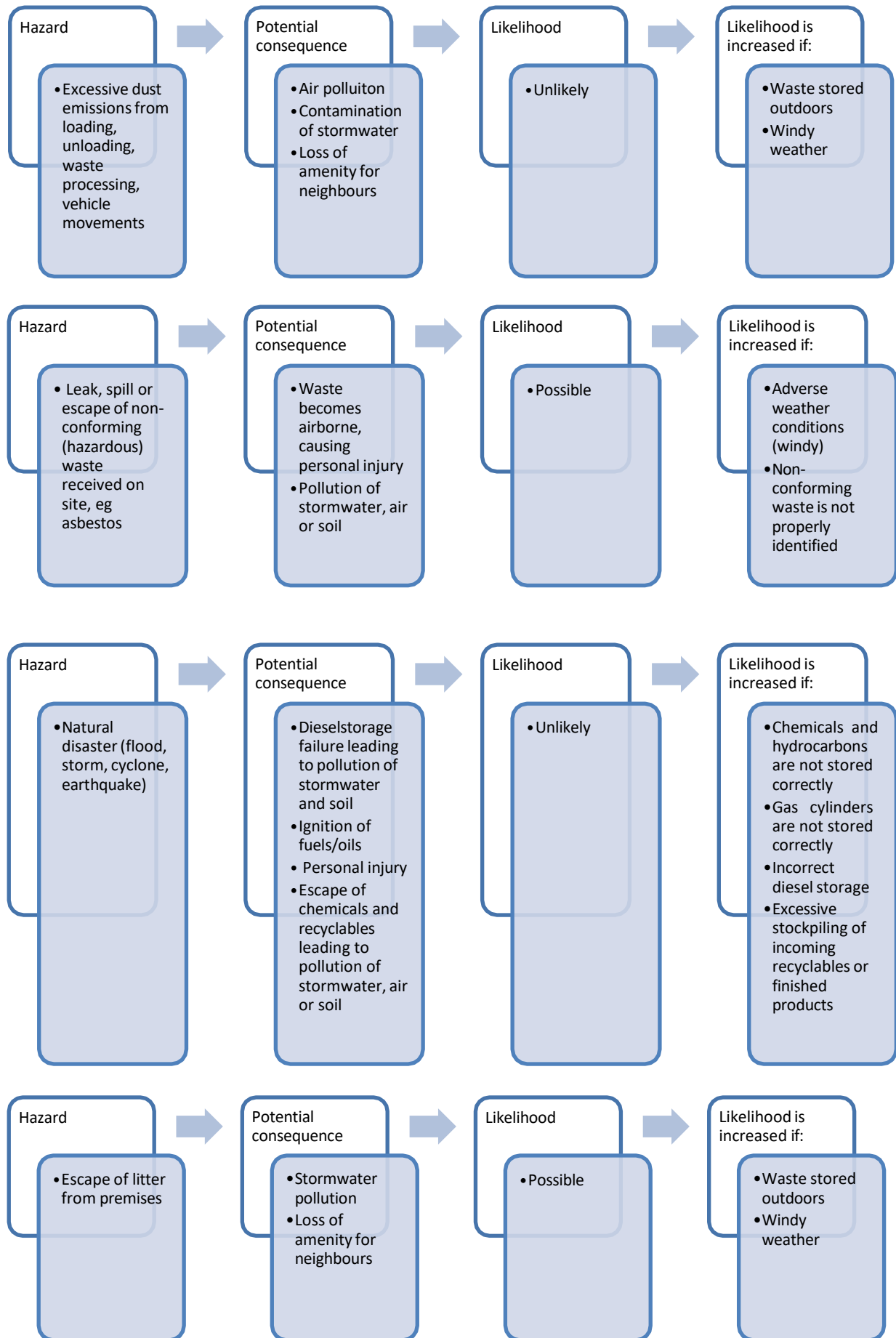
Details of the activities of the premises immediately surrounding Polytrade Enfield MRF are shown below.

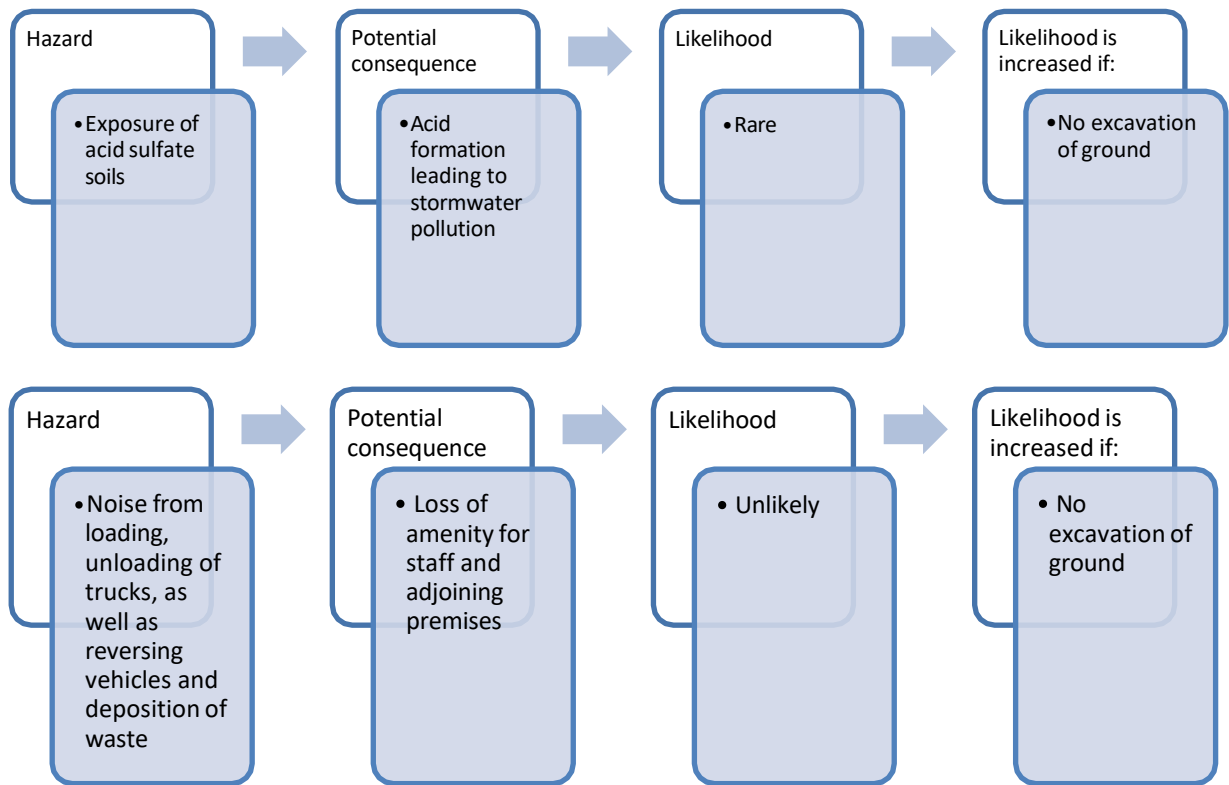
Figure 5 Details of premises immediately neighbouring Polytrade

Pro-Axle	Shamrock Developments	K&S Freighting	Kaczanowski & Co	2-14 Madeline Street
<ul style="list-style-type: none"> •84-108 Madeline Street •4WD, heavy vehicle and truck laser wheel alignment and axle correction 	<ul style="list-style-type: none"> • Lot 21, 22 and 23 of 14-82 Madeline Street •Provider of asphaltting, drainage, concrete works, paving, streetscaping, retaining walls, landscaping and site remediation works. 	<ul style="list-style-type: none"> •1 Hope Street (cnr Madeline St) •Also occupies site in front of Pro-Axle on the other side of Madeline Street •transport and logistics 	<ul style="list-style-type: none"> •29-33 Madeline Street •Producer of pastrami, Christmans ham and deli smallgoods 	<ul style="list-style-type: none"> •multiple commercial / industrial units •new industrial warehouse development (industrial units) including ancillary offices, café, hardstand, car parking. •Unit 3/60 Fairford Road Padstow NSW 2211 Australia •work 02

3 Description and likelihood of the main hazards





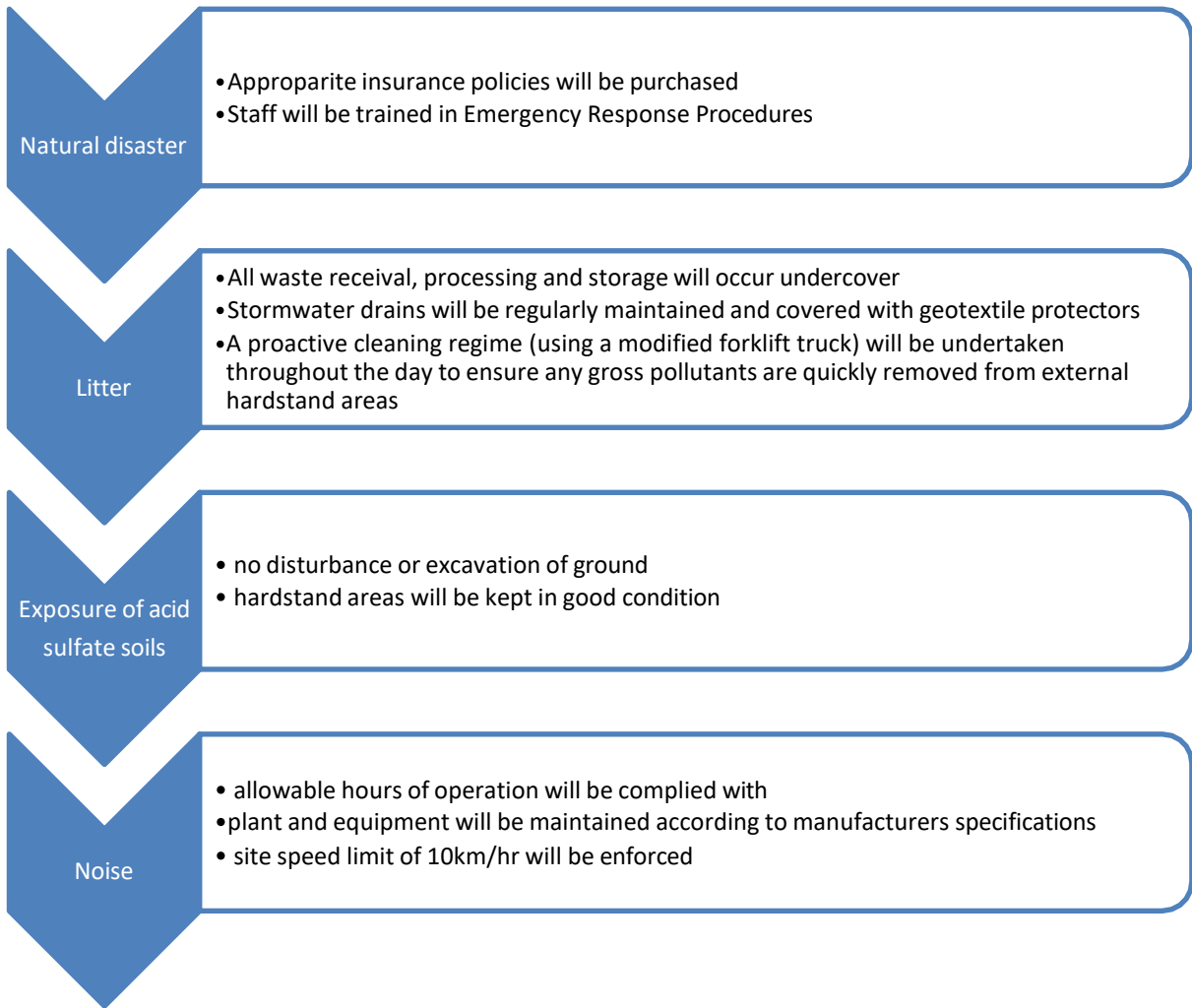


4 Pre-emptive actions to be taken

The main hazards, and the mitigation measures in place for each one, are shown below.

Figure 6 Pre-emptive actions to avoid pollution incidents





5 Inventory of potential pollutants

Table 1 Inventory of potential pollutants

Potential pollutant	Storage location	Maximum quantity on site
Diesel	Above ground bunded tank	1000 litres
Engine coolant	Storage cage within workshop	100 litres
Hydraulic oil	Storage cage within workshop	2 x 30 litre drums
Engine oil	Storage cage within workshop	100 litres
Transmission oil	Storage cage within workshop	100 litres
Degreaser	Storage cage within workshop	40 litres
Grease tube	Storage cage within workshop	48 x 450 g tubes
Gas (oxygen)	Caged area in MRF building	3 x 10.5 m ³ bottles
Gas (acetylene)	Caged area in MRF building	3 x 8.7 m ³ bottles
Gas (argon)	Caged area in MRF building	2 x 11.3 m ³ and 1x1.5 m ³ bottles
LPG gas bottles	Caged area in MRF building	20 x 20 kg

6 Safety and clean-up equipment

Table 2 Safety and clean-up equipment

Equipment	Location
Spill kits	Various in MRF building
Material Safety Data Sheets	In office
Geotextile drain protectors	On all stormwater inlets
First Aid Kit	Office and kitchen
Fire extinguishers	Multiple, see Figures 7 (MRF) and 8 (office)
Fire hoses	Multiple, see Figure 7 (MRF) and 8 (office)
Personal Protective Equipment	Office

Figure 7 Location of fire extinguishers and fire hoses: MRF building

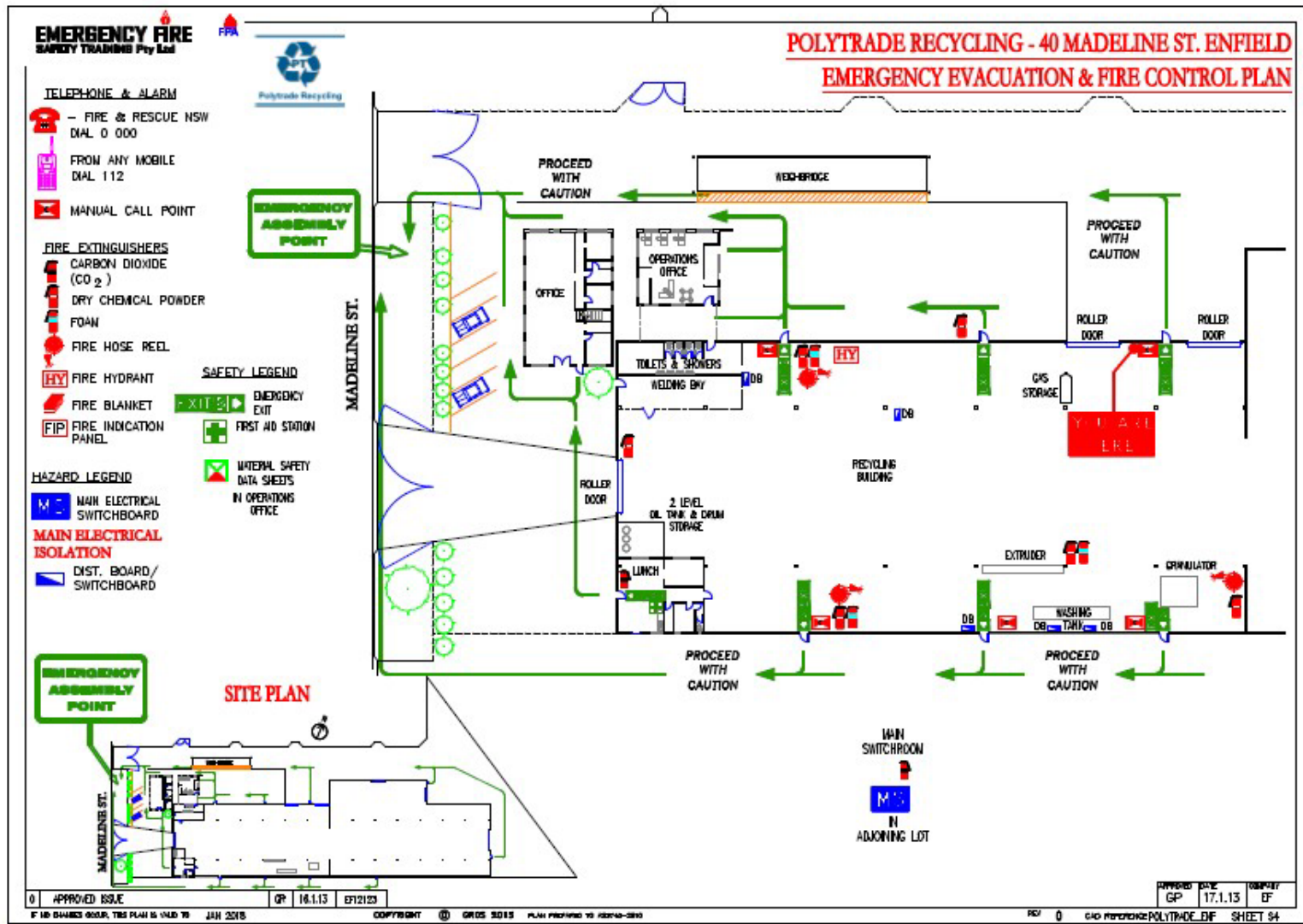
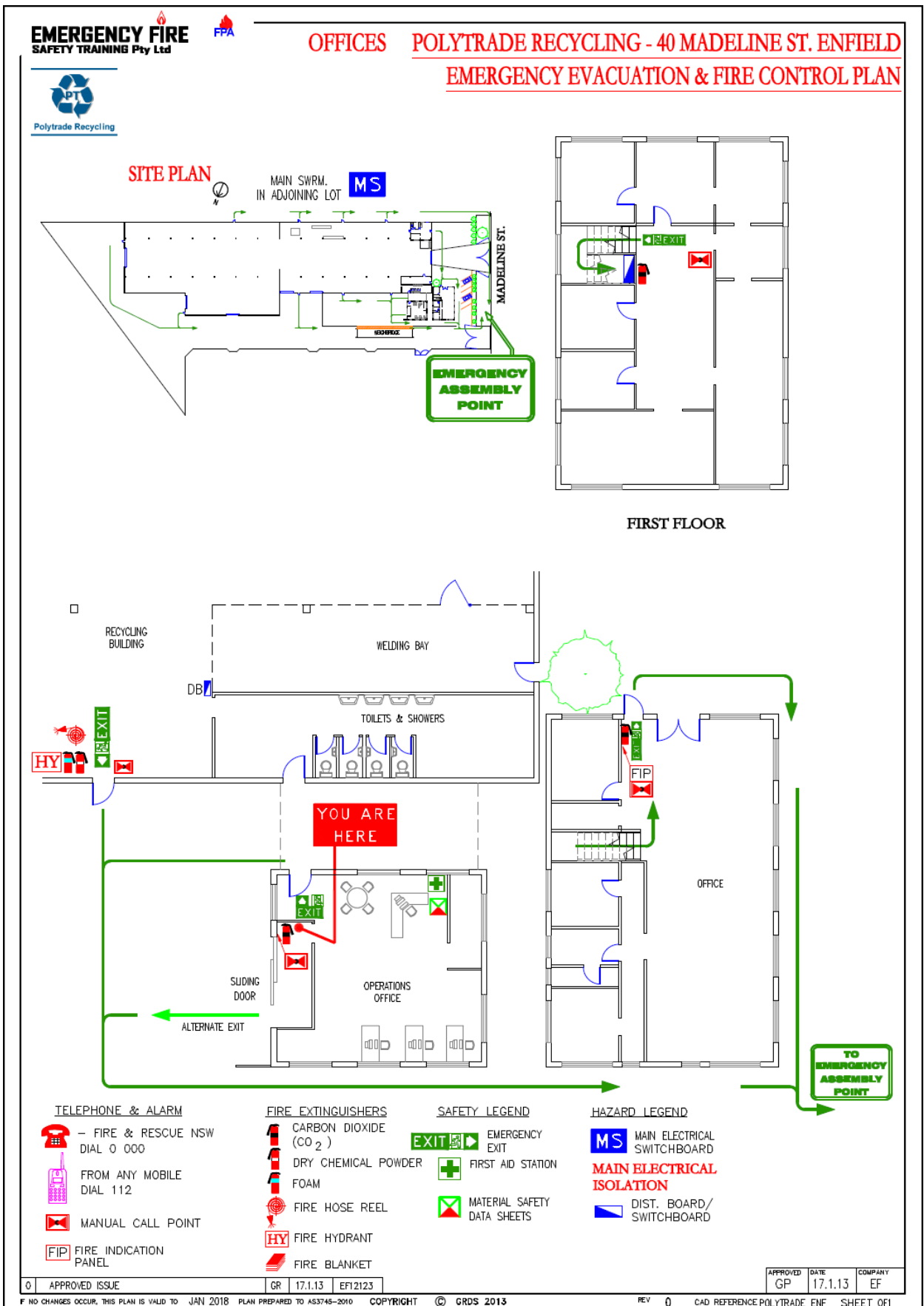


Figure 8 Location of fire extinguishers and fire hoses: Office



7 Contact details & responsible person

The person responsible for implementing this plan is Nathan Ung, NSW Business Manager, Polytrade Recycling.

In the case of a pollution incident, the following people should be notified immediately:

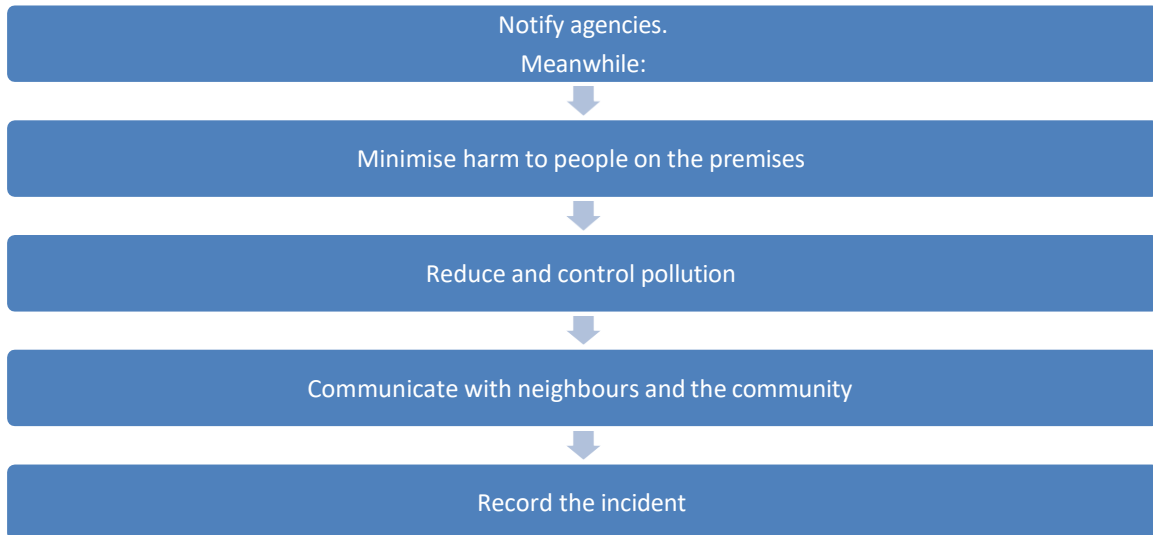
Primary site contact	<ul style="list-style-type: none">• Nathan Ung• NSW Business Manager• 0417 225 825
Secondary site contact	<ul style="list-style-type: none">• Tracy Tran / Vivian Nguyen• Systems Administration Management• 02 9642 7222

Both the primary and secondary site contacts are based at the Enfield operations facility.

8 Actions to be taken during or immediately after a pollution incident

All communication regarding the co-ordination of action taken in combating pollution immediately after a pollution incident will be through the MRF Team Leader.

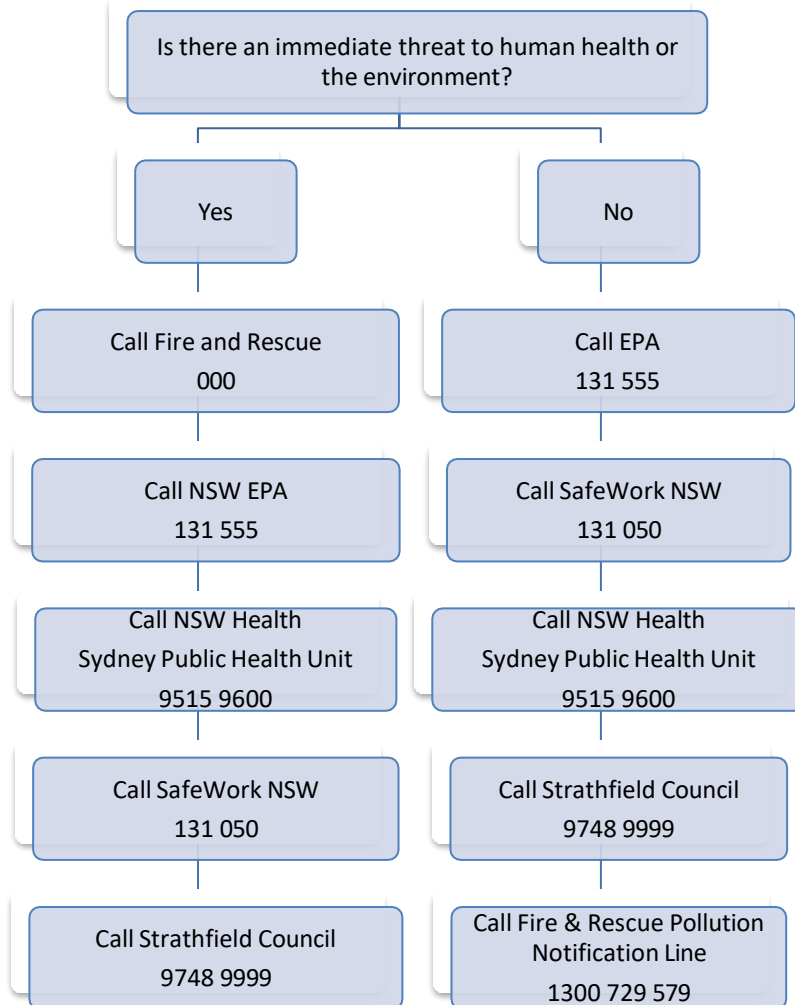
Figure 9 Overview of actions to be taken during or immediately after a pollution incident



Each of the above steps is described below.

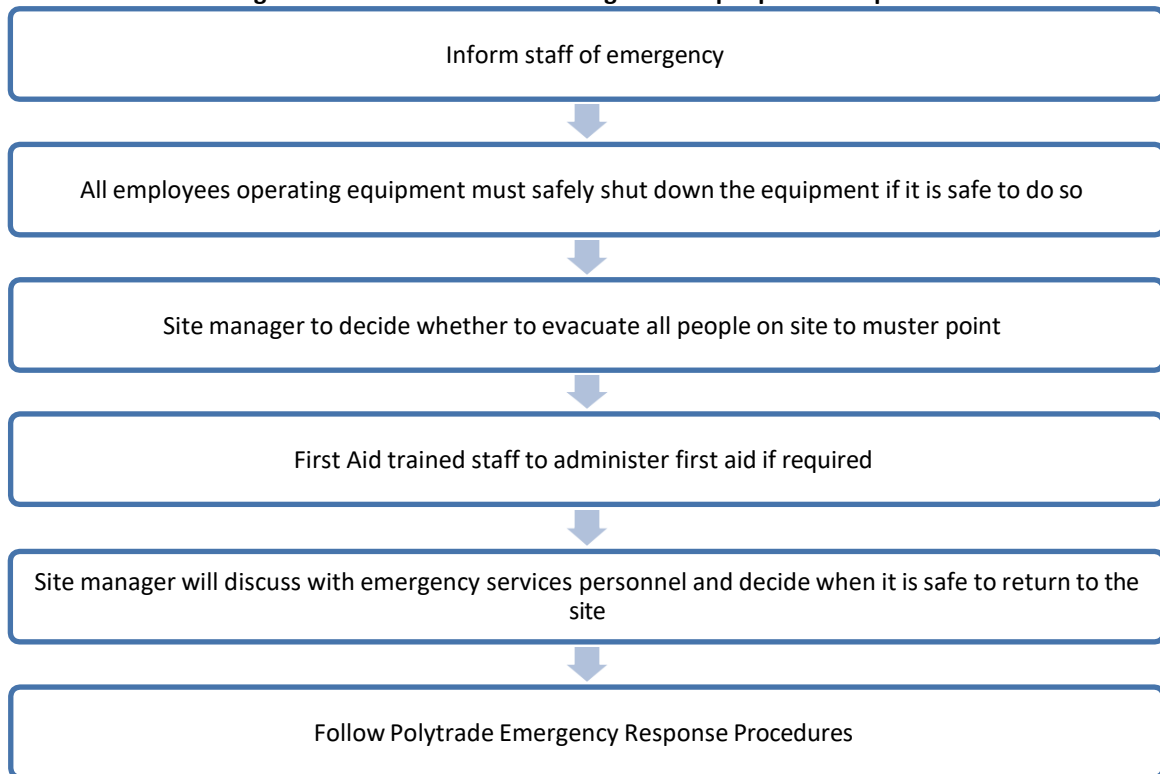
8.1 Notify agencies

Figure 10 Actions for notifying agencies



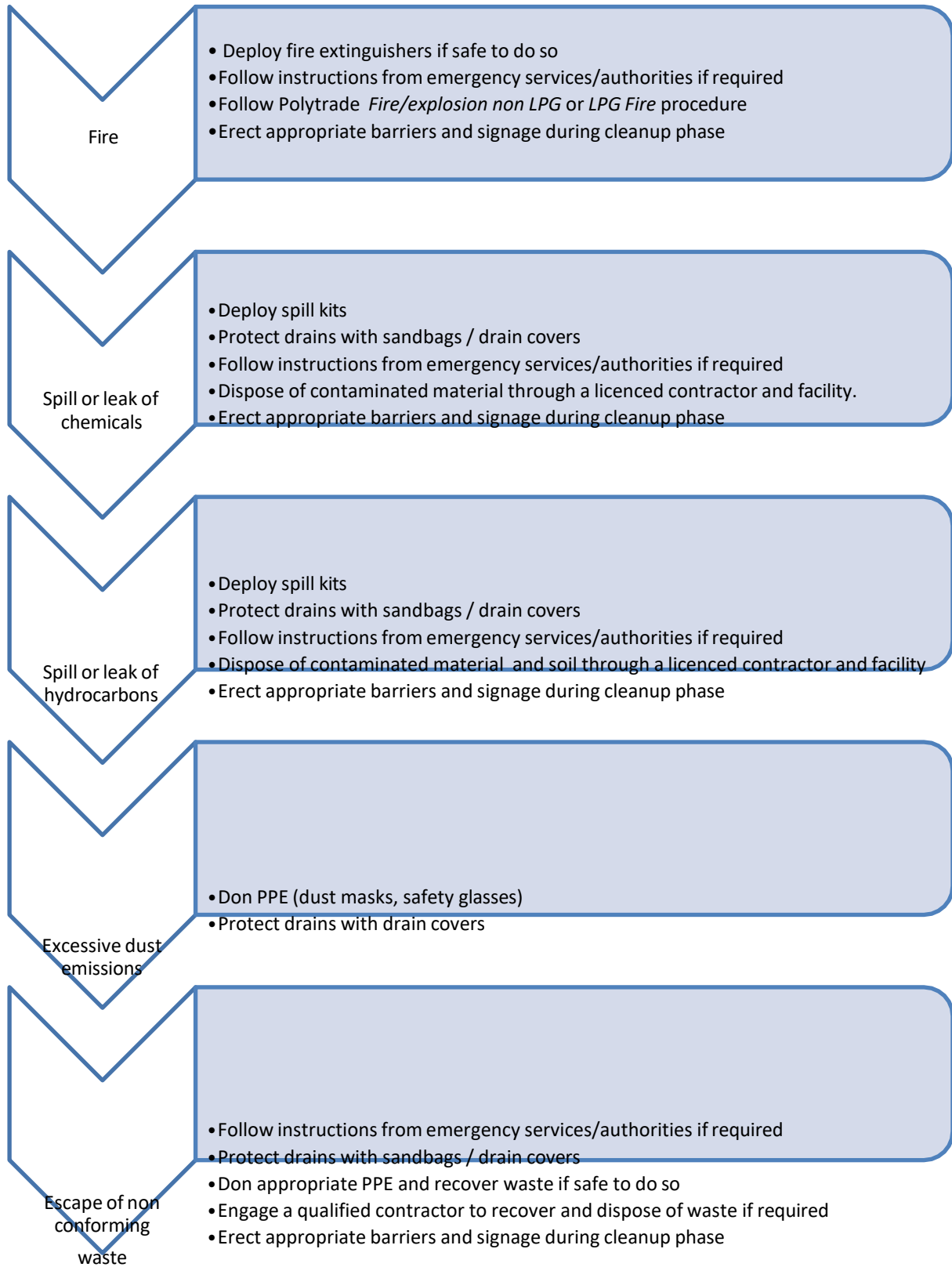
8.2 Minimise harm to people on the premises

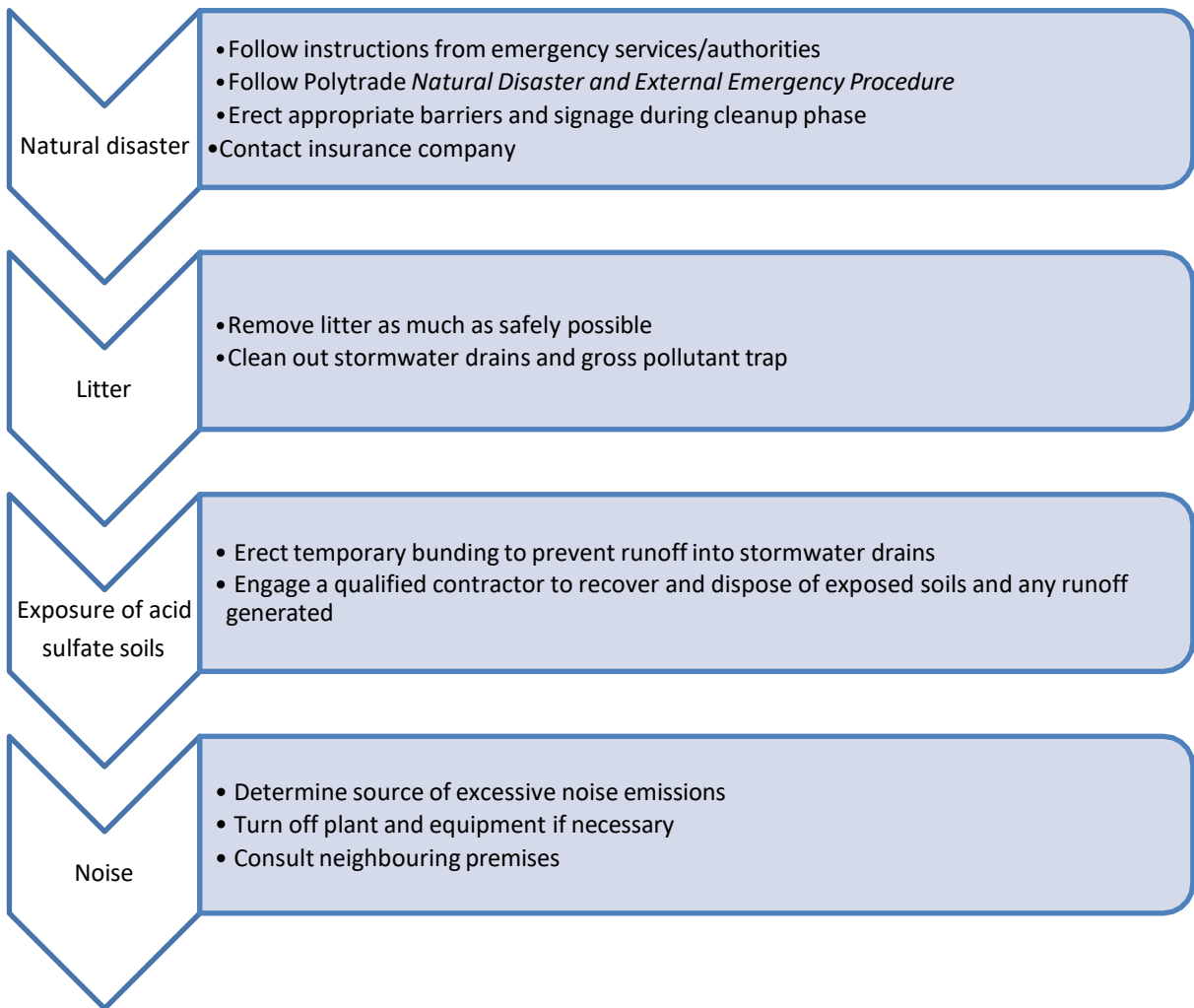
Figure 11 Actions for minimising harm to people on the premises



8.3 Reduce and control pollution

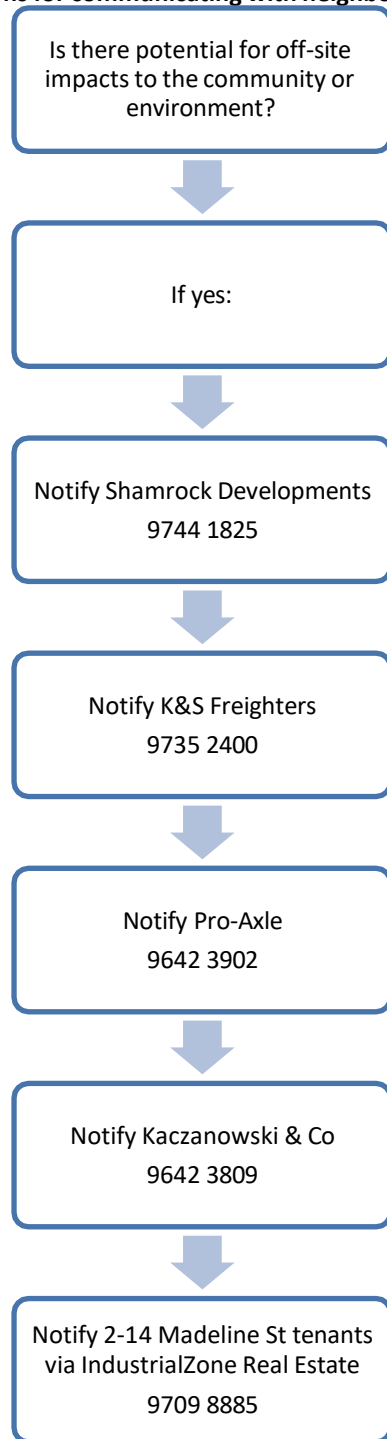
Figure 12 Actions for reducing and controlling pollution after an incident





8.4 Communicate with neighbours and the community

Figure 13 Actions for communicating with neighbours and the community



8.5 Record the incident

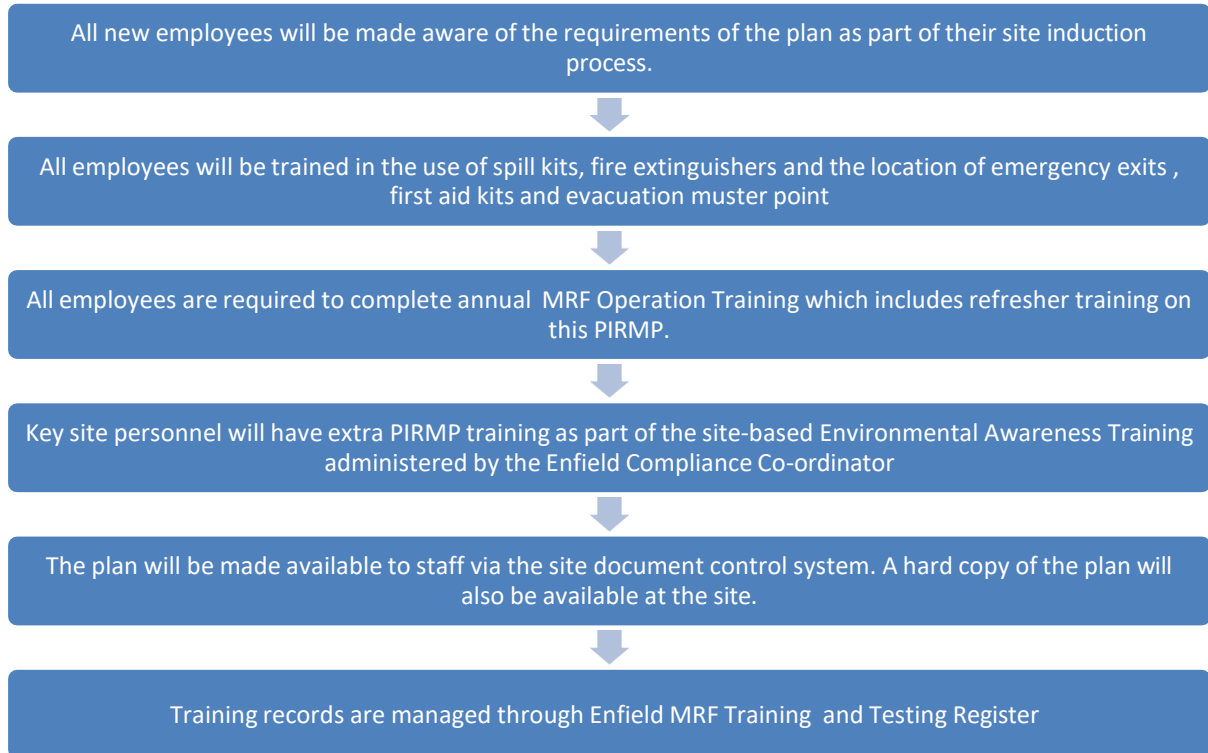
Figure 14 Actions for recording a pollution incident



9 Staff training and testing of this plan

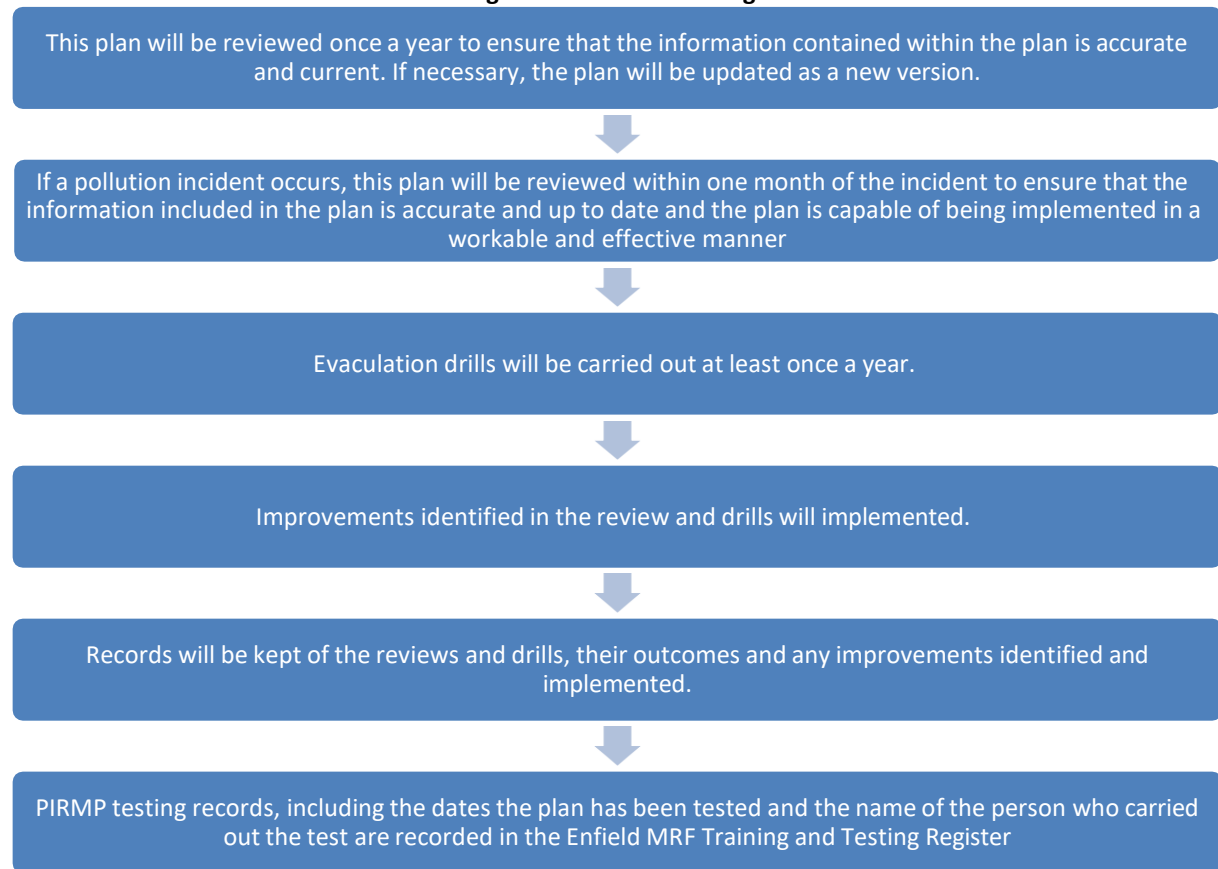
9.1 Staff training

Figure 15 Staff PIRMP training



9.2 Testing this plan

Figure 16 PIRMP testing



10 Location of pollutant storage, evacuation point and drains

Figure 17 Potential pollutant storage and evacuation point map

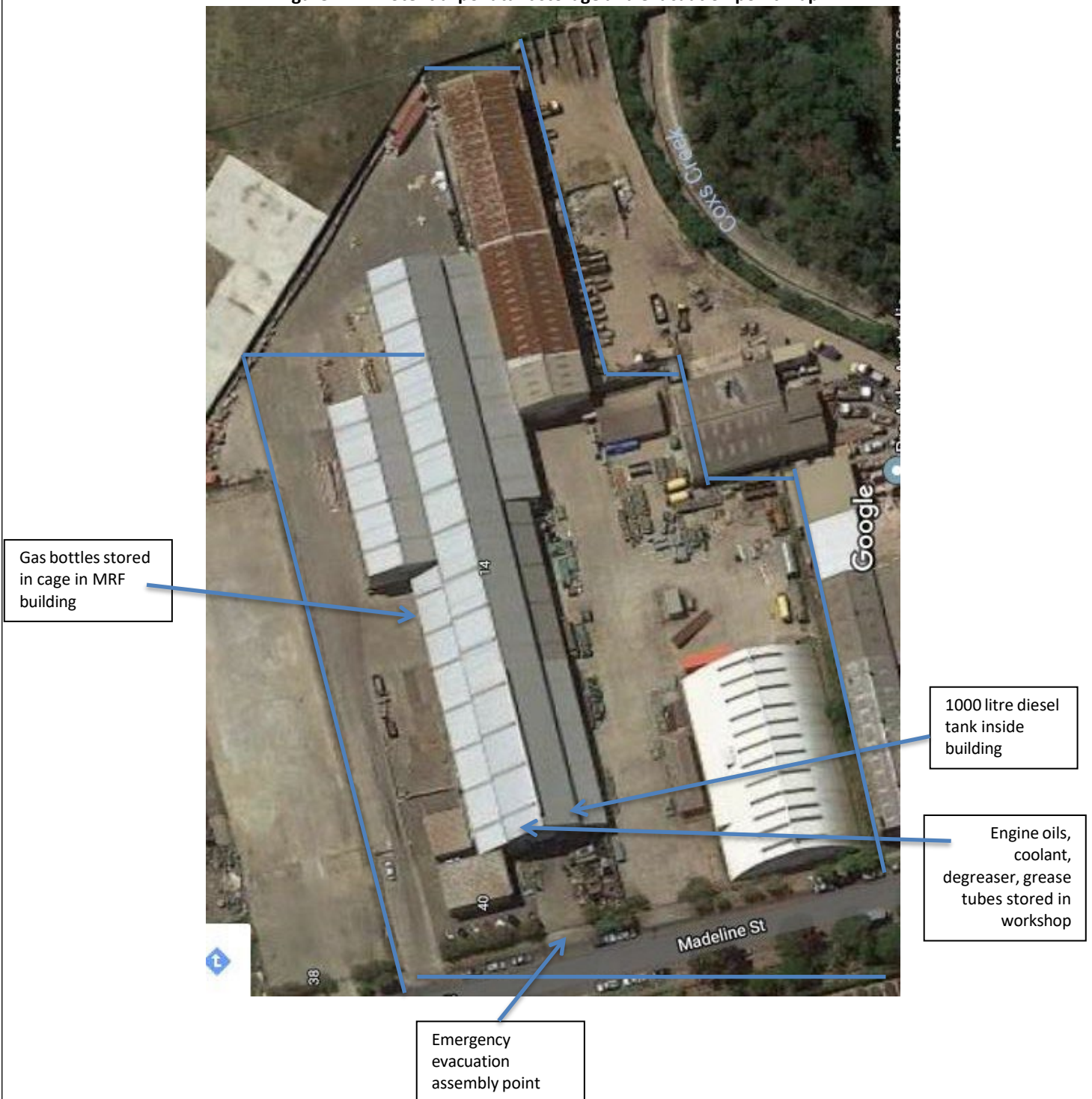
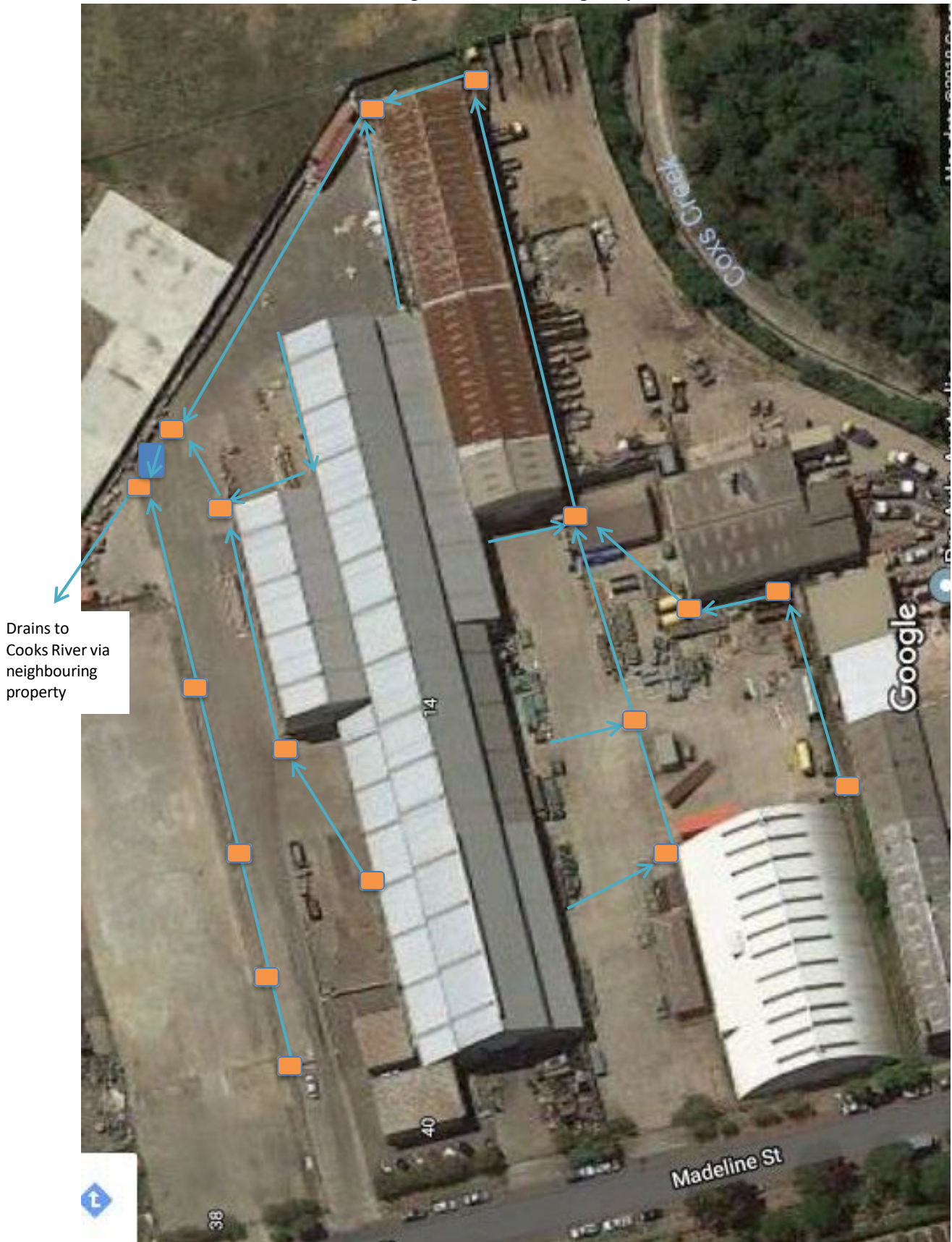


Figure 18 Site drainage map



Drains to Coxs River via neighbouring property



- Stormwater360 cartridge stormfilter system (below ground)
- Stormwater inlet / pit with geotextile cover and litter trap
- Underground stormwater pipes

11 Related documents

The following Polytrade management system documents are referred to in this PIRMP:

Figure 19 Related Polytrade documents

Polytrade Incident Management Procedure	<ul style="list-style-type: none">• Available on site
Polytrade Incident Report Form	<ul style="list-style-type: none">• Available on site• To be filled out by the person who was at the site of the incident
Polytrade Incident Log Sheet	<ul style="list-style-type: none">• Available on site• To be filled out by Site Manager
Polytrade Emergency Response Procedures	<ul style="list-style-type: none">• Available on site• includes the following:<ul style="list-style-type: none">• medical emergency and injury• natural disaster and external emergency• hold-up, assault or robbery• fire/ explosion, non LPG• LPG leak/fire• bomb threat checklist
Polytrade Non-conforming Waste Procedure	<ul style="list-style-type: none">• Available on site
Polytrade Enfield MRF Training and Testing Register	<ul style="list-style-type: none">• Available on site• Includes fire, safety, emergency and environmental training