

# 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 challene assumptions.



# Celebrate

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

## Contents

| 1 Purp                 | ose of this plan   | 3  |
|------------------------|--|----|
| 2 Abou                 | t the site   | 4  |
| 2.1                    | Site location  | 5  |
| 2.2                    | Overview of waste receival and processing  | 6  |
| 2.3                    | Nearest sensitive receptors  | 8  |
| 2.4                    | Adjoining premises   | 9  |
| 3 Desc                 | ription and likelihood of the main hazards                                       | 11 |
|                        | mptive actions to be taken   |    |
| 5 Inver                | itory of potential pollutants  | 16 |
| 6 Safet                | y and clean-up equipment   | 17 |
| 7 Cont                 | act details & responsible person   | 20 |
| 8 Actio                | ns to be taken during or immediately after a pollution incident                  | 21 |
| 8.1                    | Notify agencies  | 21 |
| 8.2                    | Minimise harm to people on the premises  |    |
| 8.3                    | Reduce and control pollution   | 24 |
| 8.4                    | Communicate with neighbours and the community                                    | 26 |
| 8.5                    | Record the incident  | 26 |
| 9 Staff                | training and testing of this plan  | 27 |
| 9.1                    | Staff training   | 27 |
| 9.2                    | Testing this plan  | 28 |
| 10 Lo                  | cation of pollutant storage, evacuation point and drains                         | 29 |
| 11 Re                  | lated documents  | 31 |
| Tables                 |  |    |
| Table 1                | Inventory of potential pollutants  |    |
| Table 2                | Safety and clean-up equipment  | 17 |
|                        |  |    |
| Figures                |  |    |
| Figure 1               | Site location  |    |
| Figure 2               | Aerial view of site showing site boundary  |    |
| Figure 3               | Nearest sensitive receptors  |    |
| Figure 4               | Adjoining premises   |    |
| Figure 5               | Details of premises immediately neighbouring Polytrade                           |    |
| Figure 6               | Pre-emptive actions to avoid pollution incidents                                 |    |
| Figure 7               | Location of fire extinguishers and fire hoses: MRF building                      |    |
| Figure 8               | Location of fire extinguishers and fire hoses: Office                            |    |
| Figure 9               | Overview of actions to be taken during or immediately after a pollution incident |    |
| Figure 10              | Actions for notifying agencies   |    |
| Figure 11              | Actions for minimising harm to people on the premises                            |    |
| Figure 12              | Actions for reducing and controlling pollution after an incident                 |    |
| Figure 13              | Actions for communicating with neighbours and the community                      |    |
| Figure 14              | Actions for recording a pollution incident                                       |    |
| Figure 15              | Staff PIRMP training   |    |
| Figure 16              | PIRMP testing  |    |
| Figure 17<br>Figure 18 | Potential pollutant storage and evacuation point map  Site drainage map          |    |
| Figure 18              | Related Polytrade documents  |    |
| こっとしい ピートラー            | NEIGHEN EUNTIQUE UULUITIID   |    |

# 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:

Ensure comprehensive and timely <u>communication</u> about a pollution incident to staff, EPA, authorities and other stakeholders



<u>Minimise and control the risk</u> of a pollution incident by identifying risks and planning actions to minimise and manage them



Ensure that the plan is properly <u>implemented</u> by nominated trained staff, and regularly <u>tested</u>

A "pollution incident" is defined as:

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.

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 seperated 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.

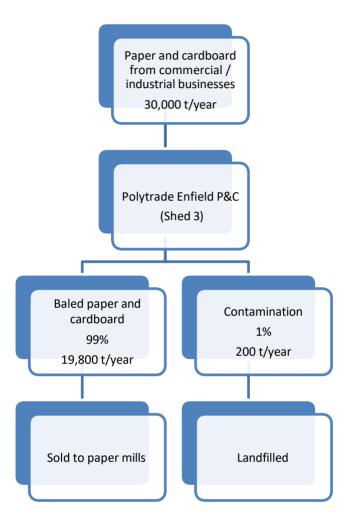


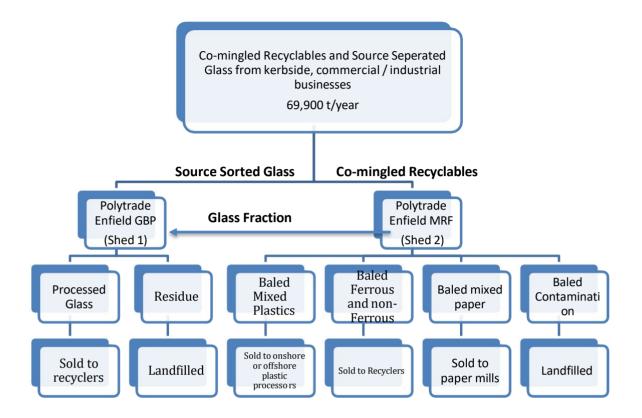
Figure 2 Aerial view of site showing site boundary



## 2.2 Overview of waste receival 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.



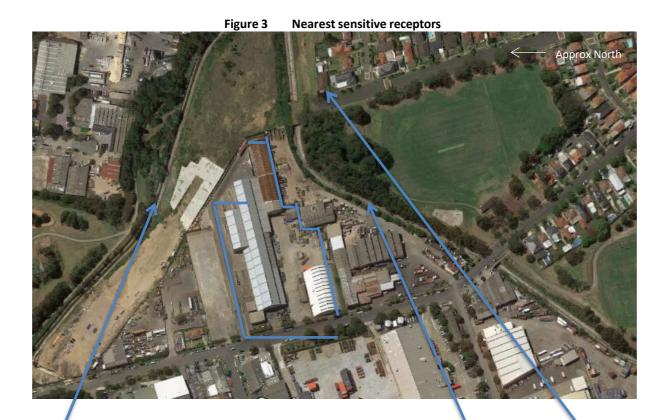


### 2.3 Nearest sensitive receptors

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.



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.

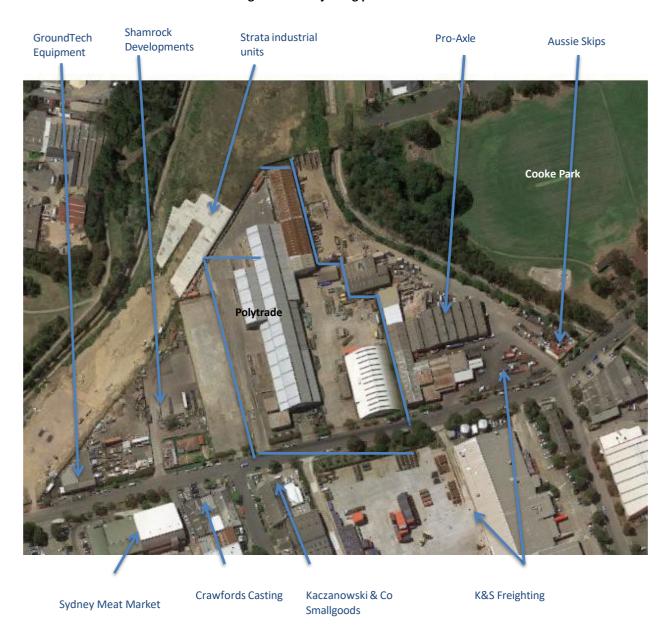


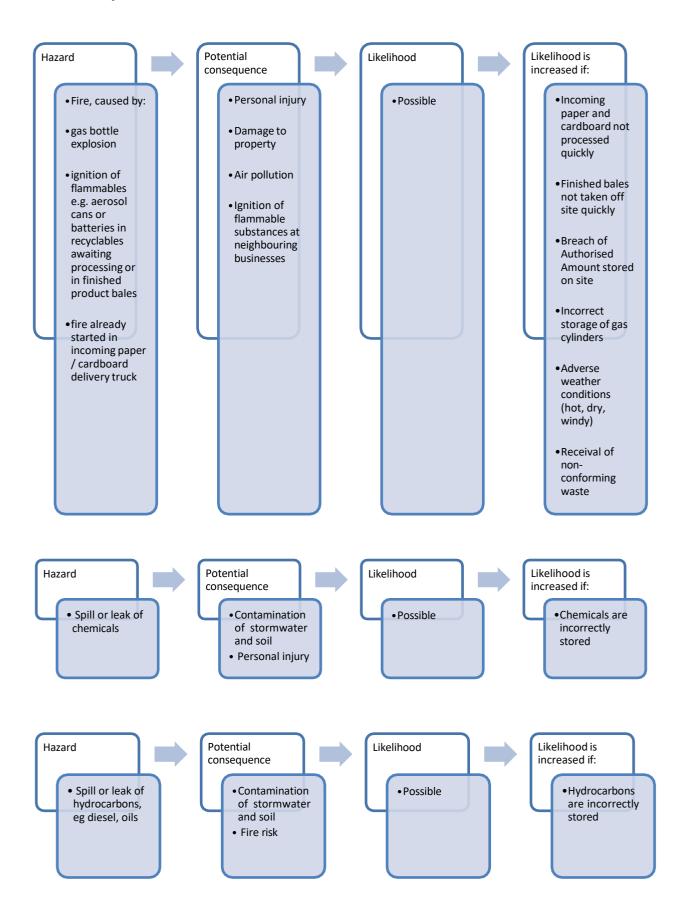
Figure 4 Adjoining premises

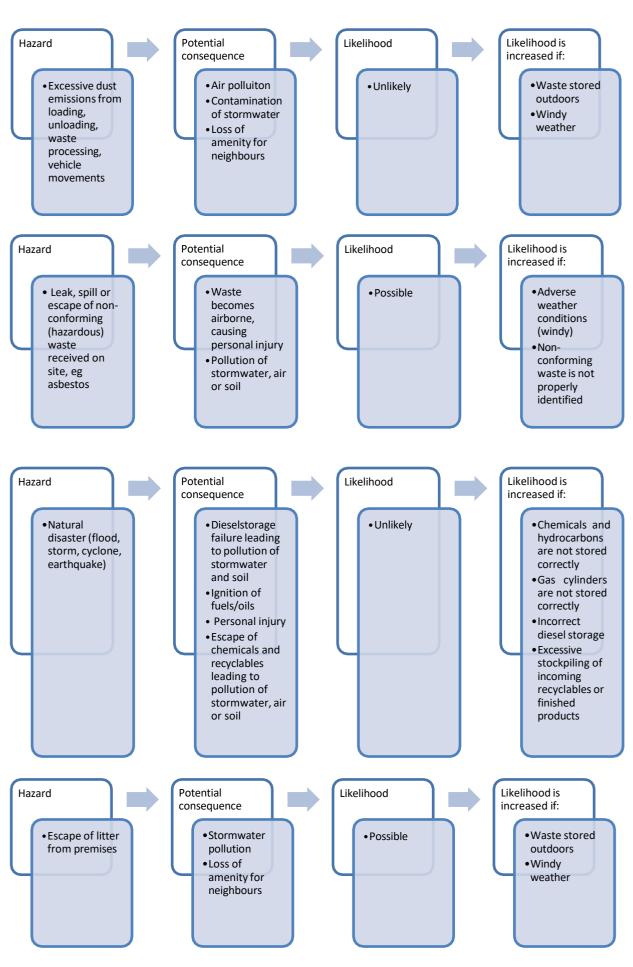
Details of the activities of the premises immediately surrounding Polytrade Enfield MRF are shown below.

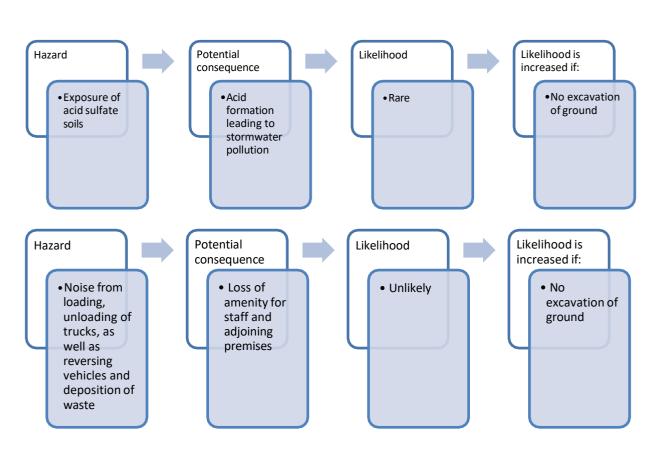
Figure 5 Details of premises immediately neighbouring Polytrade

| Pro-Axle   | Shamrock<br>Developments  | K&S Freighting  | Kaczanowski & Co   | 2-14 Madeline<br>Street   |
|--|---|---|--|---|
| •84-108 Madeline<br>Street   | <ul> <li>Lot 21, 22 and 23<br/>of 14-82 Madeline<br/>Street</li> </ul>  | •1 Hope Street (cnr<br>Madeline St)   | • 29-33 Madeline<br>Street   | <ul><li>multiple<br/>commercial /<br/>industrial units</li></ul>  |
| • 4WD, heavy vehicle and truck laser wheel alignment and axle correction | • Provider of asphalting, drainage, concrete works, paving, streetscaping, retaining walls, landscaping and site remediation works. | <ul> <li>Also occupies site in front of Pro-Axle on the other side of Madeline Street</li> <li>transport and logistics</li> </ul> | Producer of<br>pastrami,<br>Christmans ham<br>and deli<br>smallgoods | <ul> <li>new industrial warehouse development (industrial units) including ancillary offices, café, hardstand, car parking.</li> <li>Unit 3/60 Fairford Road Padstow NSW 2211 Australia</li> <li>work 02</li> </ul> |

# 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

- Amount of waste on site will remain under the prescribed limit
- •Incoming paper and cardboard will be processed through the MRF into finished products within 10 hours of receival
- Fire hoses, general purpose fire extinguishers, and fire extinguishers suitable for control of oil/fuel fires, will be available on site
- •Staff will be trained in the use of fire extinguishers
- Gas cylinders will be stored in storage cage and labelled correctly

Spill or leak of chemicals

Fire

- All chemicals will be appropriately stored, labelled
- Spill kits will be ready accessible and maintained
- Material Safety Data Sheets for all chemiclas will be available on site
- Drains will be protected with geotextile covers

Spill or leak of hydrocarbons

- Diesel will be stored in a self-bunded vessel compliant with AS1940:2004 The storage and handling of flammable and combustible liquids
- Spill kits will be ready accessible and maintained
- Any diesel spillages will be immediately contained and absorbed, and disposed of appropriately

4

- All incoming recyclables will be tipped and processed undercover
- All finished product bales will be stored undercover
- Recyclables stored on site will not exceed Authorsied Amount
- 10 km/hr site speed limit will be enforced

Excessive dust emissions

- Any non-conforming waste identified will be dealt with in accordance with the Procedure for Non-Conforming Waste
- Storage of material on site will not exceed Authorised Amount
- Drains will be fitted with sediment filters
- Litter will be proactively managed (see Litter section below)

Escape of non conforming waste

# Natural disaster

- Approparite insurance policies will be purchased
- •Staff will be trained in Emergency Response Procedures

- All waste receival, processing and storage will occur undercover
- Stormwater drains will be regularly maintained and covered with geotextile protectors
- •A proactive cleaning regime (using a modified forklift truck) will be undertaken throughout the day to ensure any gross pollutants are quickly removed from external hardstand areas

- no disturbance or excavation of ground
- hardstand areas will be kept in good condition

# Exposure of acid sulfate soils

- allowable hours of operation will be complied with
- plant and equipment will be maintained according to manufacturers specifications
- site speed limit of 10km/hr will be enforced

# 5 Inventory of potential pollutants

Table 1 Inventory of potential pollutants

| Detection of the state of the s |                              |  |  |  |  |
|--|------------------------------|--|--|--|--|
| 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 <sup>3</sup> bottles                          |  |  |  |
| Gas (acetylene)  | Caged area in MRF building   | 3 x 8.7 m <sup>3</sup> bottles                           |  |  |  |
| Gas (argon)  | Caged area in MRF building   | 2 x 11.3 m <sup>3</sup> and 1x1.5 m <sup>3</sup> 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

|                               | a cicair ap cquipment                        |
|-------------------------------|--|
| 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                                       |

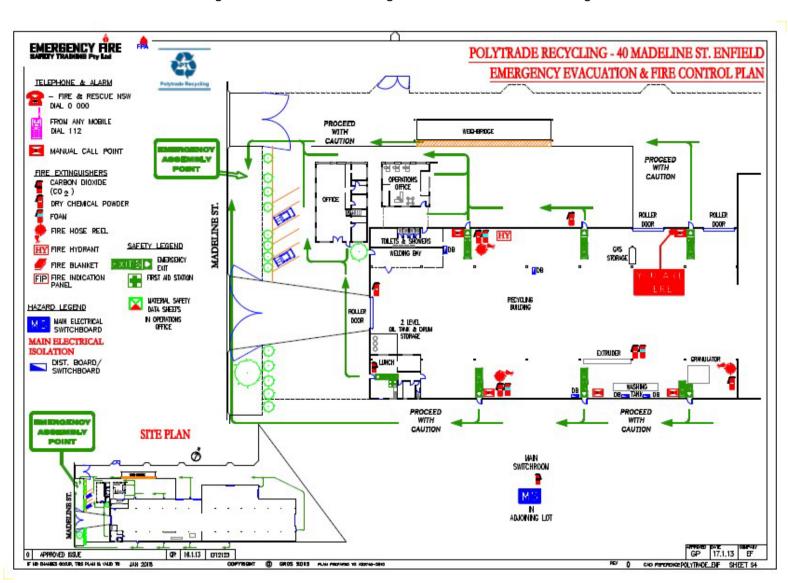


Figure 7 Location of fire extinguishers and fire hoses: MRF building

CAD REFERENCE POLYTRADE\_ENF SHEET OF1

**EMERGENCY FIRE** POLYTRADE RECYCLING - 40 MADELINE ST. ENFIELD **OFFICES** EMERGENCY EVACUATION & FIRE CONTROL PLAN SITE PLAN MAIN SWRM.
IN ADJOINING LOT POINT FIRST FLOOR RECYCLING BUILDING WELDING BAY TOILETS & SHOWERS HY OFFICE SLIDING OPERATIONS DOOR ALTERNATE EXIT all D 1000 TELEPHONE & ALARM FIRE EXTINGUISHERS SAFETY LEGEND HAZARD LEGEND CARBON DIOXIDE - FIRE & RESCUE NSW EXIT EMERGENCY EXIT MS MAIN ELECTRICAL SWITCHBOARD (CO<sub>2</sub>) DIAL 0 000 DRY CHEMICAL POWDER FIRST AID STATION MAIN ELECTRICAL FROM ANY MOBILE FOAM ISOLATION DIAL 112 MATERIAL SAFETY DIST. BOARD/ SWITCHBOARD FIRE HOSE REEL DATA SHEETS MANUAL CALL POINT HY FIRE HYDRANT FIP FIRE INDICATION PANEL 🍠 FIRE BLANKET 17.1.13 EF APPROVED ISSUE GR 17.1.13 EF12123 REV 0

Figure 8 Location of fire extinguishers and fire hoses: Office

F NO CHANGES OCCUR, THIS PLAN IS VALID TO JAN 2018 PLAN PREPARED TO AS3745—2010 COPYRIGHT © GRDS 2013

# 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

• Nathan Ung
• NSW Business Manager
• 0417 225 825

• 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

Notify agencies.

Meanwhile:

Minimise harm to people on the premises

Reduce and control pollution

Communicate with neighbours and the community

Record the incident

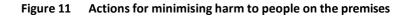
Each of the above steps is described below.

## 8.1 Notify agencies

Is there an immediate threat to human health or the environment? Yes No Call Fire and Rescue Call EPA 000 131 555 Call NSW EPA Call SafeWork NSW 131 555 131 050 Call NSW Health Call NSW Health Sydney Public Health Unit Sydney Public Health Unit 9515 9600 9515 9600 Call SafeWork NSW Call Strathfield Council 131 050 9748 9999 Call Fire & Rescue Pollution Call Strathfield Council **Notification Line** 9748 9999 1300 729 579

Figure 10 Actions for notifying agencies

## 8.2 Minimise harm to people on the premises



Inform staff of emergency

All employees operating equipment must safely shut down the equipment if it is safe to do so

Site manager to decide whether to evacuate all people on site to muster point

First Aid trained staff to administer first aid if required

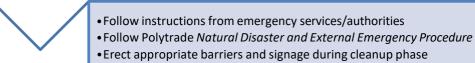
Site manager will discuss with emergency services personnel and decide when it is safe to return to the site

Follow Polytrade Emergency Response Procedures

### 8.3 Reduce and control pollution

Actions for reducing and controlling pollution after an incident Figure 12 • Deploy fire extinguishers if safe to do so • Follow instructions from emergency services/authorities if required • Follow Polytrade Fire/explosion non LPG or LPG Fire procedure • Erect appropriate barriers and signage during cleanup phase Fire Deploy spill kits Protect drains with sandbags / drain covers • Follow instructions from emergency services/authorities if required • Dispose of contaminated material through a licenced contractor and facility. Spill or leak of • Erect appropriate barriers and signage during cleanup phase chemicals Deploy spill kits Protect drains with sandbags / drain covers • Follow instructions from emergency services/authorities if required · Dispose of contaminated material and soil through a licenced contractor and facility Spill or leak of • Erect appropriate barriers and signage during cleanup phase hydrocarbons • Don PPE (dust masks, safety glasses) Protect drains with drain covers Excessive dust missions • Follow instructions from emergency services/authorities if required Protect drains with sandbags / drain covers • Don appropriate PPE and recover waste if safe to do so scape of no • Engage a qualified contractor to recover and dispose of waste if required conforming

• Erect appropriate barriers and signage during cleanup phase



Natural disaster •Contact insurance company

Litter

- Remove litter as much as safely possible
- Clean out stormwater drains and gross pollutant trap

Exposure of acid sulfate soils

- Erect temporary bunding to prevent runoff into stormwater drains
- Engage a qualified contractor to recover and dispose of exposed soils and any runoff generated

Noise

- Determine source of excessive noise emissions
- Turn off plant and equipment if necessary
- Consult neighbouring premises

### 8.4 Communicate with neighbours and the community

Is there potential for off-site impacts to the community or environment? If yes: Notify Shamrock Developments 9744 1825 Notify K&S Freighters 9735 2400 Notify Pro-Axle 9642 3902 Notify Kaczanowski & Co 9642 3809 Notify 2-14 Madeline St tenants via IndustrialZone Real Estate 9709 8885

Figure 13 Actions for communicating with neighbours and the community

### 8.5 Record the incident

Follow the Polytrade Incident Management Procedure

Figure 14

Actions for recording a pollution incident

Use the Polytrade Incident Report Form

Record details in the Polytrade Incident Log Sheet

# 9 Staff training and testing of this plan

## 9.1 Staff training

### Figure 15 Staff PIRMP training

All new employees will be made aware of the requirements of the plan as part of their site induction process.

All employees will be trained in the use of spill kits, fire extinguishers and the location of emergency exits,

first aid kits and evacuation muster point

All employees are required to complete annual MRF Operation Training which includes refresher training on this PIRMP.

Key site personnel will have extra PIRMP training as part of the site-based Environmental Awareness Training administered by the Enfield Compliance Co-ordinator

The plan will be made available to staff via the site document control system. A hard copy of the plan will also be available at the site.

Training records are managed through Enfield MRF Training and Testing Register

### 9.2 Testing this plan

### Figure 16 PIRMP testing

This plan will be reviewed once a year to ensure that the information contained within the plan is accurate and current. If necessary, the plan will be updated as a new version.



If a pollution incident occurs, this plan will be reviewed within one month of the incident 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



Evaculation drills will be carried out at least once a year.



Improvements identified in the review and drills will implemented.



Records will be kept of the reviews and drills, their outcomes and any improvements identified and implemented.



PIRMP testing records, including the dates the plan has been tested and the name of the person who carried out the test are recorded in the Enfield MRF Training and Testing Register

# 10 Location of pollutant storage, evacuation point and drains

Figure 17 Potential pollutant storage and evacuation point map

1000 litre diesel tank inside building

Engine oils, coolant, degreaser, grease tubes stored in workshop

Emergency evacuation assembly point

Madeline St

Gas bottles stored in cage in MRF building



### 11 Related documents

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

Figure 19 Related Polytrade documents

Polytrade Incident Management • Available on site Procedure Available on site Polytrade Incident Report Form • To be filled out by the person who was at the site of the incident • Available on site Polytrade Incident Log Sheet • To be filled out by Site Manager Available on site • includes the following: medical emergency and injury Polytrade Emergency Response • natural disaster and external emergency Procedures • hold-up, assault or robbery • fire/ explosion, non LPG • LPG leak/fire • bomb threat checklist Polytrade Non-conforming Waste Available on site Procedure Polytrade Enfield MRF Training and • Available on site **Testing Register** •Includes fire, safety, emergency and environmental training