



Pollution Incident Response Management Plan

76 Burrows Road, Alexandria NSW 2015

October 2018

REVISION HISTORY

Name	Date	Reasons for Change	Version
Legal	March 2015	Initial release	1
Legal	May 2015	Update	2
Legal	March 2016	Update	3
Legal	March 2017	Update	4
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1. PURPOSE AND SCOPE

This Pollution Incident Response Management Plan (**PIRMP**) has been developed to minimise the health and environmental impacts of a pollution incident arising on the site due to activities carried out for which the site is licensed.

The *Protection of the Environment Legislation Amendment Act 2011* received assent on 16 November 2011 resulting in changes to the *Protection of the Environment Operations Act 1997* (**POEO Act**).

The intent of the PIRMP is to improve the way pollution incidents are reported and managed.

This PIRMP addresses Part 5.7A of the POEO Act.

This PIRMP applies to Dial A Dump Industries Pty Limited (**DADI**) Waste Transfer Station located at 76 Burrows Road, Alexandria.

Environmental Protection Licence (**EPL**) 4679 applies to the site and authorises the following scheduled activities to be carried out on site:

- Waste processing (non-thermal treatment) and Waste Storage

DADI is the Licensee of EPL 4679.

As the holder of EPL 4679 the Licensee is required to comply with the POEO Act; as such, this document has been developed to satisfy the Pollution Incident Response Management Plan requirements.

The site and the activities are described in full in the site Environmental Management Strategy.

This PIRMP addresses section 153C of the POEO Act, and section 98C of the *Protection of the Environment Operations (General) Regulations 2009* (**POEO Regulation**) by:

- describing the hazards to human health and the environment associated with the activities occurring on site;
- describing the likelihood of such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood;
- detailing actions to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activities;
- including an inventory of potential pollutants on the premises or used in carrying out the activities;
- including the maximum quantity of any pollutant that is likely to be stored or held at particular locations at or on the premises, including a map outlining the areas on site;
- listing the name, positions and 24-hour contact details of those key individuals who:
 - are responsible for activating the plan;
 - are authorized to notify relevant authorities under section 148 of the POEO Act; and
 - are responsible for managing the response to the pollution incident,
- listing the contact details of each relevant authority referred to in section 148 of the POEO Act;

- details of the mechanisms for providing regular updates and early warnings to other premises in the vicinity of the site;
- describing arrangements for minimizing the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on;
- describing how risk to human health will be reduced by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk;
- outlining the nature and objectives of any staff training program in relation to the plan; and
- outlining the manner in which the plan is to be tested and maintained.

2. PROTOCOL FOR INDUSTRY NOTIFICATION OF POLLUTION INCIDENTS

ORDER FOR NOTIFICATION	
For key personnel to implement immediately upon becoming aware of the incident.	
IF INCIDENT THREATENS HUMAN HEALTH OR PROPERTY	Call 000 Fire and Rescue NSW, NSW Police, and NSW Ambulance Services are the first responders
CONTACT APPROPRIATE REGULATORY AUTHORITY (ARA) = EPA (Environment Protection Authority)	131 555
CONTACT MINISTER OF HEALTH	Public Health Officer (Royal Prince Alfred) 9515 6111 Public Health Officer (Westmead) 9840 3603 9845 5555 (After Hours)
CONTACT WORKCOVER AUTHORITY	13 10 50
CONTACT COUNCIL (Local authority/Consent authority)	City of Sydney Council 9265 9333
IF NOT AN EMERGENCY, CONTACT FIRE AND RESCUE NSW LAST	Call 000

Other relevant emergency contacts include:

Sydney Water	13 20 90	Origin Energy	13 24 61	Poison Information Centre	13 11 26
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Energy Australia	1800 146 749	Telstra Cable Damage	13 22 03	AGL Gas	13 12 45
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3. SITE MANAGEMENT

The following summarises the various key personnel responsible for and authorised to activate this plan, and manage the response to the pollution incident.

Position	Name	Phone	Email
Transfer Station Manager	Grant Walker	0409 600 006	grantwalker@dadi.com.au
Group Operations Manager	Rodney Johnson	0408 919 562	rodneyjohnson@dadi.com.au
Chief Financial Officer	Darin Marks	9519 9999 0429 233 022	darinmarks@dadi.com.au
Managing Director	Ian Malouf	9519 9999 0418 968 123	ianmalouf@dadi.com.au
General Counsel	Christopher Biggs	9519 9999 0438 902 021	chrisbiggs@dadi.com.au

4. STAKEHOLDER AND COMMUNITY CONTACTS

The following summarises the contact details of the owners and occupiers of nearby premises in the vicinity of the Site.

Landowner	Contact Person	Phone	Email
Carlewie Pty Ltd	Joi Feiertag	9519 9999	enquiries@dadi.com.au

Occupants of nearby premises	Address	Contact Person	Phone	Email
Trilogy Smash Repairs	68 Burrows Road, Alexandria NSW 2044	Site Manager		NA (please contact the DADI Site Operations Manager for the relevant contact information)
Sims Metal	72 Burrows Road, Alexandria NSW 2044	Site Manager		
DADI Group Head Office	84-88 Burrows Road, Alexandria NSW 2015	Site Manager		
Only About Children Alexandria	95 Burrows Road Alexandria	Campus Director		

5. WHAT IS A POLLUTION INCIDENT?

A 'pollution incident' occurs in the course of an activity so that material harm to the environment is caused or threatened: section 148(a) of the POEO Act.

It means an incident or set of circumstances during or as a consequence of which there is or is likely to be:

- a leak
- a spill
- an 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 the premises.

It does not include the emission of odour only, or a circumstance involving only the emission of any noise.

Before a pollution incident needs to be reported, it must threaten to cause, or cause, material harm to the environment.

According to section 147 of the POEO Act, 'material harm to the environment' means:

- actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000.

It is still material harm to the environment if the only harm is caused in the premises where the pollution incident occurs.

6. HAZARDS

A list of potential pollutants at the Site, the quantity of each potential pollutant and its location is shown in **Appendix B**.

GROUNDWATER

All of the activities are performed on concrete hardstand within the confines of a fully enclosed building, with bunding present to prevent the flow of water outside of the building. Furthermore an inward sloping gradient on surface of the hardstand ensures that any water present would run towards the centre of the building and pool there, to be absorbed by materials stockpiled for transfer.

The potential for off-site impacts on down-gradient beneficial uses is therefore minimal. Similarly the risk of significant harm to human health or the environment is considered to be very low.

SURFACE WATER

Any present risk to surface water quality is minimal.

AIRBORNE IMPURITIES AND TOXINS

Dust is unlikely to be emitted from the building as advanced dust suppression sprinklers are located in strategic positions throughout the enclosure to trap and remove airborne dust before it can leave the Premises

FIRE

Burning of refuse is strictly forbidden, and will not take place under any circumstances at the Site.

In the event that the premises is subjected to an accidental fire, all requisite fire safety systems have been implemented and will be regularly tested and maintained where necessary.

HAZARDOUS SUBSTANCES

Any hazardous wastes that are found hidden in any loads will be stored in a designated Quarantine Area in a bunded area or in covered bins and removed from the site immediately once its accurate waste classification is known.

7. MINIMISING HAZARDS

SURFACE WATER

The key issues concerning site surface water management involve ensuring that water which has come into contact with waste within the building does not escape the building or the premises.

DUST

There are a number of dust control techniques employed to reduce dust emissions, such as:

- Fixed and mobile water sprays within the building
- A water cart available on site for dust suppression
- Loads entering and leaving the site must be covered
- Vehicle speed restricted to 15km/h on designated roads
- Physical barriers and bunds sheltering stockpiles
- Water sprays on any uncovered stockpile

HAZARDOUS SUBSTANCES

Hazardous wastes, restricted solid wastes, and other unacceptable wastes, will be prevented from coming on site through implementation of the site Waste Acceptance and Screening Management Plan.

FIRE

Prevention of fire is as important as the development of efficient means of fighting it.

Litter control

The site management shall:

- Implement suitable measures to prevent the unnecessary proliferation of litter both on and off site, and
- Inspect and clear the site and surrounding area of litter on a daily basis.

Storage of wood waste

Wood waste may be received at the site and will be transferred from the premises in order to minimise the risk of fire to the building.

Water supply

Mains supply potable water is available to the site from Sydney Water Corporation.

Maintenance of exits by occupiers of buildings

The occupier of a building must ensure that all exits, paths of travel to exits and any external paths of travel to a road or open space required to be provided are maintained in an efficient condition and kept readily accessible, functional and clear of obstruction so that egress from the building or place is maintained.

Verification of Emergency Evacuation System Elements

The Site Operational Manager must ensure that checks of the emergency evacuation system elements are carried out as follows:

- *Evacuation routes and paths*
 - Exit signs/lighting – CHECK illumination by activating test button
 - Exit doors – CHECK that exit doors are free from obstruction and can function as required
 - Exit routes – CHECK that exit routes are clearly identified and free from obstructions
 - Fire doors – CHECK that fire doors close correctly
- *Emergency response and firefighting equipment*
 - Fire hose reels – CHECK that fire hose reels are identified, free from obstructions and the nozzle interlock is engaged
 - Fire extinguishers – CHECK that fire extinguishers are fully accessible, mounted, sign-posted and charged and/or sealed
 - ECO identification equipment – CHECK that equipment is available, accessible, correctly colour coded and functional
 - Radios (portable) – CHECK that signals are received and audible
 - Phones (portable and fixed) – CHECK that equipment is accessible, that signals are received and messages are audible
- *Emergency Control Organisation (ECO) and Emergency Procedures*
 - Identification – CHECK ECO member identification is readily available (eg. Helmet, cap, etc)
 - Diagrams – CHECK that evacuation diagrams are per AS 3745-2010 are in place, up to date with current area conditions
 - Availability of wardens – CHECK that ECO members are recorded, current, deputies available and aware of roles
- *Housekeeping*
 - Rubbish disposal – CHECK that rubbish has not accumulated in area of responsibility
 - Fire hazards – CHECK that no fire hazards are identifiable in area of responsibility

- Hazardous materials – CHECK that all hazardous materials are in a safe condition and registered in the area of responsibility
- *Emergency evacuation procedure documentation*
 - Distribution and availability of procedures – CHECK ECO members are supplied a copy of the documented procedures for emergency directives
 - Training records – CHECK that all trainees have been recorded and follow up on non-attendees
- *Emergency evacuation procedures training*
 - Evacuation exercises – CHECK that evacuation exercises have been conducted and observer's actions recorded for future action
 - Scheduled training – CHECK that the scheduled training has been conducted and reported
 - Management of ECO skills – CHECK that directives for education training and exercises have been completed
- *Emergency evacuation procedures monitoring*
 - Exit door release mechanisms – CHECK that the maintenance program has been conducted
 - Essential services maintenance records – CHECK contractors have signed-off the required entries
 - Monitor testing of essential services – CHECK testing (selectively) procedures
 - Monitor fault reporting of essential services – CHECK that faults have been reported
 - Rectification of essential services – CHECK that rectification work has been completed
 - Tactical fire plans – CHECK and test tactical fire plans
 - Passive system – CHECK that any works carried out on passive fire protection systems are rectified according to the facility procedures
 - Emergency lighting – CHECK that tests have been completed
- *Verification of emergency evacuation procedures*
 - Reporting to management – CHECK that emergency evacuation procedures are adequate and appropriate for the emergency response risk
 - Emergency response compliance – CHECK that all planning, allocation of tasks, training and evacuation exercises, are completed
 - Fire safety compliance – CHECK that all relevant Standards and statutory requirements are complied with
 - Monitoring hazards and conducting risk analysis – CHECK that hazards and risk analysis recommendations have been implemented.

8. MECHANISMS FOR EARLY WARNINGS AND REGULAR UPDATES

EARLY WARNINGS

Same day telephone notification to landholders whom may be affected by the incident over the subsequent 24 hour period.

REGULAR UPDATES

In order to provide clear and transparent opportunities for consultation with the community and other stakeholders, to provide the opportunity to receive feedback; and to refine or improve relevant environmental practices, various Community Consultation measures have been developed.

These include:

- The establishment of a website with relevant information; and
- The establishment of a complaints hotline; and

External stakeholders identified in the site's stakeholder database are kept informed of the operational, environmental and social performance.

Communication with these stakeholders on environmental matters is to be undertaken in accordance with the agreed community engagement protocol.

The Dial A Dump Industries Website is maintained to provide the wider community with access to the 76 Burrows Road Waste Transfer Facility monitoring results, details of current activities, policies, environmental management plans and monitoring programs and any other information in relation to the site operation that may be considered of interest to the community.

- Information updates will be publically available on the Dial A Dump Industries (Waste Transfer Centre) website (www.dadi.com.au/landfills) and relevantly includes:
- The complaints hotline number: **9519 9999**;

9. ACTIONS TO BE TAKEN FOLLOWING POLLUTION INCIDENT

SURFACE WATER

In the event of any identified contamination the following steps will be taken:

- The flow will be contained (i.e. the discharge point will be closed) until the results of the retesting are received;
- If contamination persists, the flow will remain contained;
- Relevant authorities will be notified in accordance with the Protocol, and
- A Water Remediation Plan, suited to the particular circumstances, will be put into place to the satisfaction of the EPA and Council.

DUST

Non-compliance with the air quality trigger levels would be reported promptly and corrective action taken to mitigate any impacts.

Dust control measures to be implemented will depend on the activities occurring onsite.

Results of ongoing monitoring would be reported to key personnel so that dust control and operational procedures can be reviewed and modified, if required.

FIRE AND EMERGENCY MANAGEMENT PLAN

Australian Standard 3745-2010 lists the types of emergencies that could affect 76 Burrows Road, Alexandria. This includes:

- Bomb threat
- Bushfire
- Chemical, biological and radiological
- Civil disorder
- Earthquake
- Fire
- Flood
- Hazardous substances incidents
- Industrial accident
- Medical emergency
- Severe weather/storm damage
- Structural instability
- Transport accident
- Toxic emission

The **Emergency Evacuation Management Plan** in **Appendix C** outlines actions to be taken in each circumstance, depending on the response colour codes:

Type of Emergency	Response Colour Code
Fire/Smoke	RED
Cardiac arrest/medical emergency	BLUE
Bomb threat	PURPLE
Internal emergency (<i>failure of or threat to essential services, hazardous materials incident, unarmed confrontation</i>)	YELLOW
Personal threat (armed hold-up, hostage, or other situation involving high risk or injury)	BLACK
External emergency	BROWN
Evacuation	ORANGE

10. TRAINING

Training forms an integral part of environmental and emergency management. All personnel and contractors at the facility undergo Environmental Induction Training before being allowed to commence work on site.

The Site Operations Manager must ensure that all employees are advised of the procedures to be followed in the event of an emergency and/or pollution incident within the site. This should include:

- The procedure to be followed in the event of an emergency incident
- The means of escape in the event of an emergency incident
- The location and method of operating firefighting equipment
- The procedure for conducting visitors to an exit in the event of an emergency incident
- If any person is not present at the safe place, reporting the fact to the person in charge of the site at the time.

The Site Operations Manager will oversee the identification of environmental training needs of personnel.

The responsibility for co-ordination of environmental and emergency training for the personnel is vested in the Site Operations Manager and General Counsel.

These responsibilities include development of training modules and toolbox talks for operations that may potentially result in significant environmental impacts. Environmental training is incorporated into the broader training program for the site including health, safety and operational training.

Training module documentation and records of all training provided shall be maintained in the 76 Burrows Road Waste Transfer Facility electronic filing system.

The effectiveness of training modules and sessions shall be periodically (at least annually) reviewed and the training modules updated as required.

The staff involved with the management of the facility, will be required to ensure that all operative and managerial staff have adequate training and that the training is updated on a regular basis.

The training elements required include:-

- waste categories recognition;
- waste management practices;
- waste management regulations;
- operation of equipment;
- water management;
- the location of evacuation assembly areas;
- emergency personnel identification;
- communication methods and systems';
- fire extinguisher types and their location;
- OH&S regulations and practices; and
- First aid.

11. TESTING, AUDITING AND CORRECTIVE ACTION

The entire Pollution Incident Response Management Plan is reviewed every twelve months through management reviews to ensure continuing suitability and effectiveness. The data and results of the reviews are recorded and maintained.

The periodic management reviews ensure continuing suitability, adequacy and effectiveness of the overall response plan, including assessment of area for improvement, changes in existing policies, and objectives for further improvement.

The agenda of the management review meetings is based on follow-up actions from previous reviews, proposed and planned changes to inculcate further improvement, results from any actual pollution incidents, and the corrective and preventive action taken.

Evacuation practice shall be conducted in accordance with the **Emergency Evacuation Management Plan** in **Appendix C**.

12. AVAILABILITY OF THE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

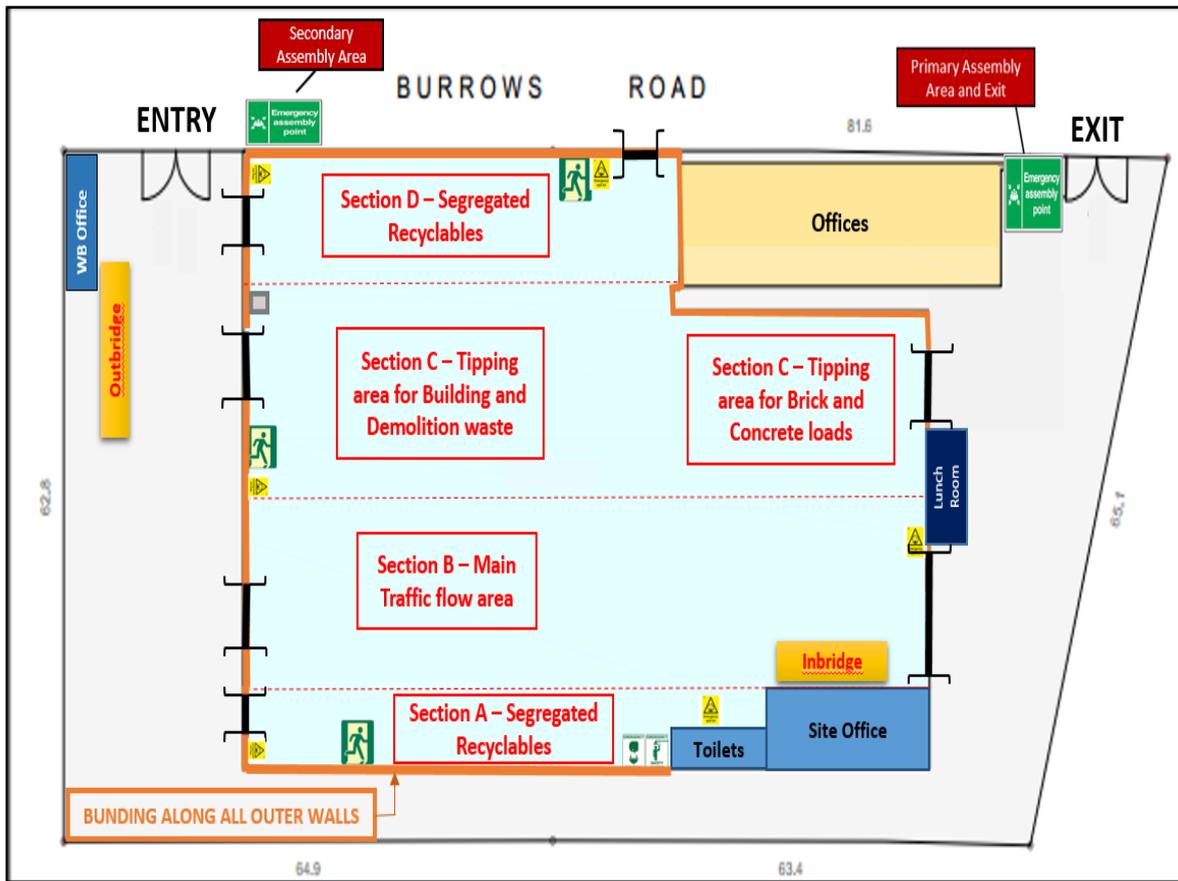
The PIRPM shall be kept in written form at the EPL premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) upon request.

The PIRPM will be made publicly available within 14 days of finalisation (taken to be authorisation of the Pollution Incident Response Management Plan by the Site Operations Manager) via the Facility Website, in a prominent position and on a publicly available page.

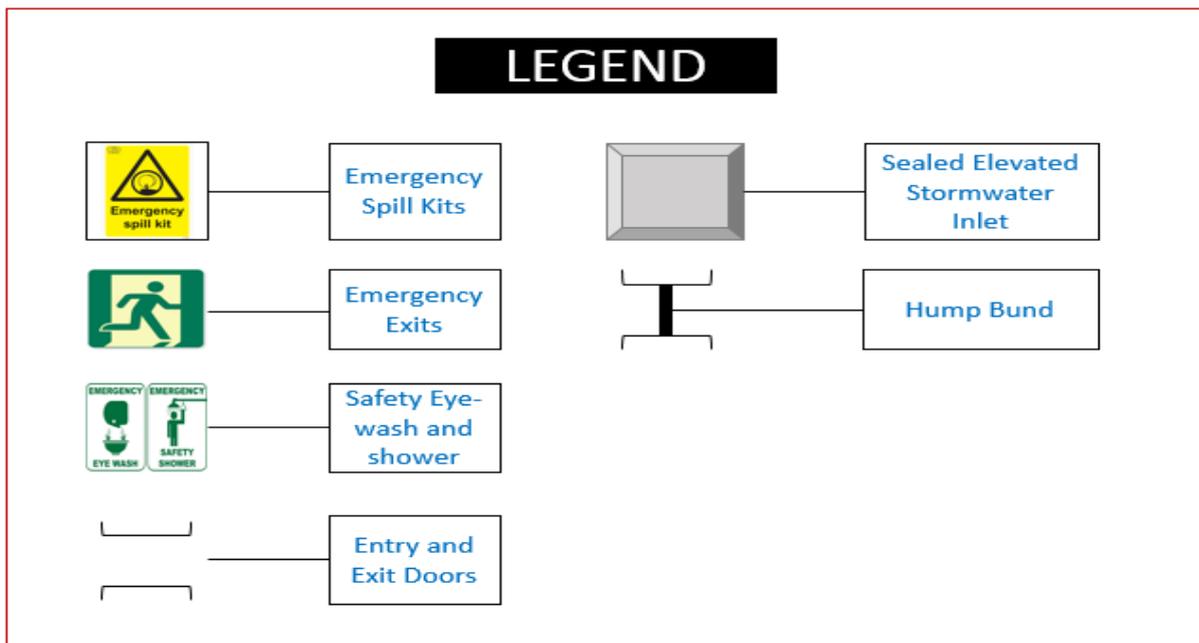
No personal information (within the meaning of the *Privacy and Personal Information Protection Act 1998*) will be made publicly available as part of the Pollution Incident Response Management Plan.

APPENDIX A: MAP

76 Burrows Road Waste Transfer Station Site Plan



Note: Drawings are not to scale



APPENDIX B: INVENTORY OF POTENTIAL POLLUTANTS

<u>Name</u>	<u>Unit (kg/L)</u>	<u>Location</u>
Top Dog Plus 10W/40 Product code 300138	205 L	Workshop
Gulf Harvester ISO68 Product Code 30072	410 L	Workshop
Gulf Western Super Blue Grease	24 X 450 gram tubes/ 3 X25 L	Service truck/ Workshop
All fleet heavy duty diesel coolant 50% premix	410 L	Workshop
Diesel Fuel	3,200 L	Portable tank

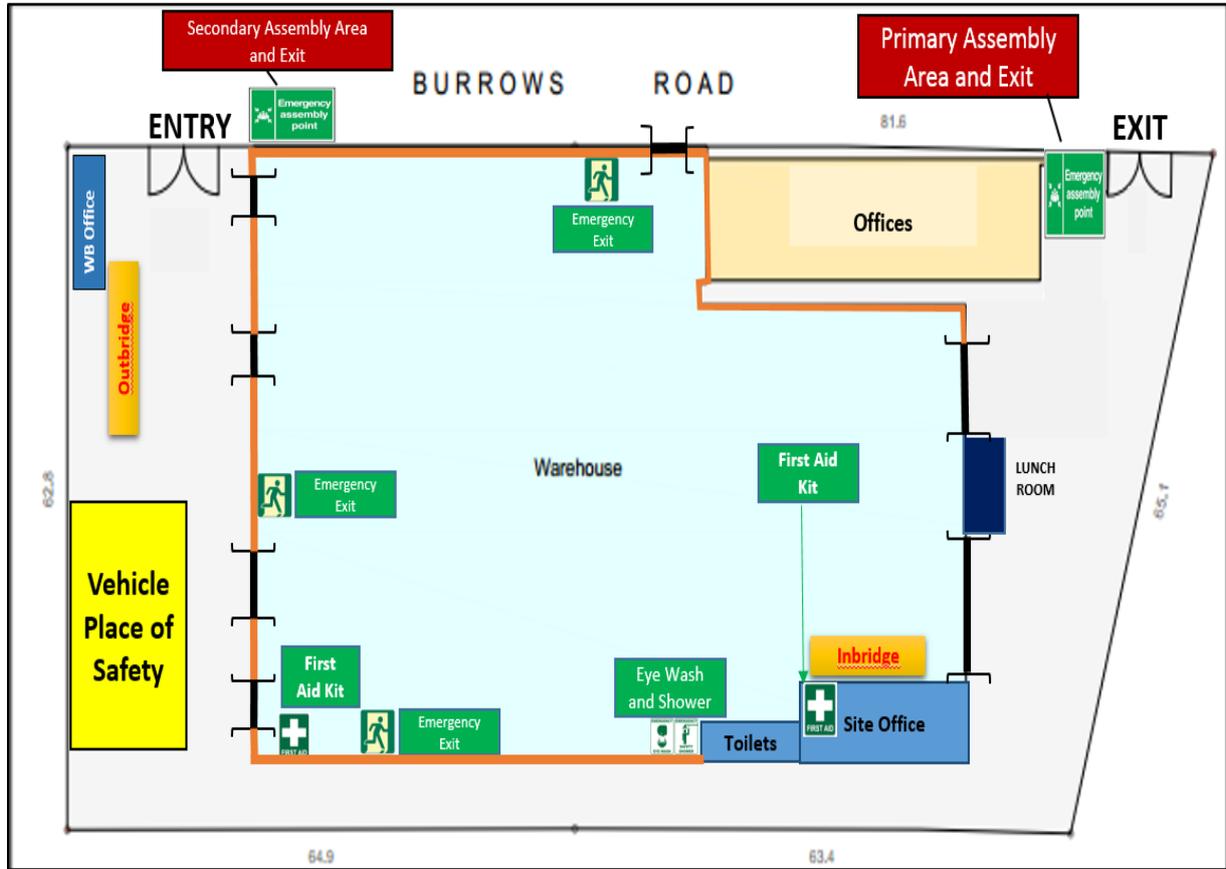
APPENDIX C: EMERGENCY EVACUATION MANAGEMENT PLAN

SITE ADDRESS: 76 Burrows Road, Alexandria, NSW 2015
Emergency contacts: Grant Walker (Transfer Station Manager) – 0409 600 006
Head Office – 02 9519 9999
Weighbridge – 02 9519 8111

In the event of an Emergency requiring evacuation of the site:

1. The Site Manager will contact the relevant Emergency Services and Area Supervisors will be contacted via 2way radio to inform them of an emergency situation.
2. If a person is injured first aid will be rendered by qualified first aid personnel. Contact details of the site's First Aid Officers are located in the Site Office and the Lunch room.
3. The Site Manager will print out a copy of all staff on site and take that with him to the emergency assembly area to be checked off. Weighbridge staff will also print out a copy of all vehicles and visitors on site and take that to the emergency assembly area to be checked off.
4. Area Supervisors will act as Muster Supervisors and be responsible to oversee that their area is completely evacuated of all staff contractors and members of the public.
5. All plant, equipment and vehicles must be driven as directed by Muster staff to a vehicle place of safety on site where the risk of fire is assessed as low. Parked vehicles must be left with keys left in the ignition so that if necessary the vehicles can be moved.
6. Vehicles must **not** be driven off site via any exit until authorized to do so by Emergency Services or the Site Manager. [This is to avoid injury to evacuating personnel or obstruction to incoming Emergency Services.]
7. All personnel will be directed to walk (NOT RUN) to the primary emergency assembly area via the primary exit.
8. If the primary exit is not able to be reached safely, evacuating personnel will be directed by Muster staff to the secondary exit and the secondary emergency assembly area.
9. At each emergency assembly area the Senior Manager present will compile a register of all persons assembled in order to account for all people known to be on site.
10. All persons must remain at the emergency assembly area until the site has been given the ALL CLEAR by authorities.
11. Emergency services will be assisted by such means and personnel as are at the disposal of Site management.
12. An investigation will be conducted to determine the cause of the emergency and what clean up measures are to be taken.

Emergency Assembly Areas



Note: Drawing is not to scale