Pollution Incident Response Management Plan

36 Stenhouse Drive, Cameron Park, Newcastle, NSW

Tyrecycle

Contents

1.0 Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to ensure compliance with our obligations under the Protection of the Environment Operations Act (POEO), but more importantly to provide clear direction to the employees and contractors of Tyrecycle about how to manage and respond to any pollution incidents that may occur.

If a pollution incident occurs and material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

Copies of this plan are kept at 36 Stenhouse Drive, Cameron Park, Newcastle, NSW and online at www.tyrecycle.com.au.

2.0 Scope

This document applies to all activities, products and services conducted at 36 Stenhouse Drive, Cameron Park, Newcastle, NSW over which Tyrecycle has operational control.

The Tyrecycle integrated HSEQ management system has other emergency preparedness and response processes in place that overlap with and complement elements of this document.

3.0 Legislative Requirements

- Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (Waste) Regulations 2014
- Protection of the Environment Operations (General) Regulation 2009
- Contaminated Land Management Act 1997
- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2017
- Environment Protection Licence 11686

4.0 Internal References

- PR600 Emergency Response Procedure
- PR602 Incident Management Procedure

5.0 Terms and Definitions

TERMS	
EMS	Environmental Management System
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan

HSEQ	Health, Safety, Environment, Quality
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act

DEFINITIONS	
Pollution Incident	A pollution incident is material harm to the environment which requires immediate notification.
Material Harm to the Environment	Actual or potential harm to ecosystems or to the health or safety of people that is not trivial; or Has cause or may potentially cause more than $10,000 property damage or clean-up costs.
Immediate Notification	Promptly and without delay, after the person becomes aware of a pollution incident; as soon as it is safe to do so; and not as to delay immediate actions to ensure the health and safety of people or to contain a pollution incident.
Environmental Hazard	Any situation or state of events which poses a threat to the surrounding environment.

6.0 Environmental Protection Licence (EPL) Details

Name of licensee:	Tyrecycle Pty Ltd
EPL Number:	11686
Premises name and address:	36 Stenhouse Drive, Cameron Park, Newcastle NSW 2285
Website address:	https://www.tyrecycle.com.au
Scheduled activities on EPL:	This license allows for the storage of 150 tonnes of waste tyres on-site at any time
Fee-based activities on EPL:	N/A

7.0 Potential Environmental Hazards

7.1 Identification of Potential Hazards

The site at Stenhouse Drive, Newcastle is used for recycling end of life tyres, primarily by shredding. Table 1 below identifies the main hazards to human health and/or the environment associated with Tyrecycle Newcastle operations.

Table 1

Identified Hazard	Residual Risk	Likelihood
Air Pollution Incident		
Dust	Low	Very Low
Smoke / Fire	High	Low
Water Pollution Incident		
Oil Spill	Very Low	Very Low
Chemical Spill	Low	Very Low
Battery Acid Spill	Low	Very Low
Tyre Shred Contamination	Low	Low
Fire Wash Water	High	Low
Washing of Trucks	Very Low	Very Low
Noise Pollution Incident		
Tyre shredding processes and mobile plant operation	Very Low	Very Low
Land Pollution Incident		
Fire	High	Low
Oil / Chemical Spill	Low	Very Low

7.2 Pre-Emptive Actions

Table 2 provides a description of the control measures taken to minimise or prevent harm to human health and/or the environment associated with Tyrecycle Newcastle operations.

Table 2

Identified Hazard	Control Measures
Noise	– Routine Fixed and mobile plant maintenance – Routine inspections and audits

Identified Hazard	Control Measures
Oil Filter Spill	– Oil filters are pre-drained by the customer prior to collection to reduce residual volume. – Oil filters are stored in containers that are stored on undercover bunds. – Spill kits are available, and employees are trained to use them. – Regular collections are arranged to ensure that minimum levels are kept on-site at all times. – Induction training modules (employees and contractors); Collection SWMS; Collection Truck Training Module; Truck audits
Battery Acid Spill	– Batteries are stored on bunds, undercover until plastic wrapped and collected by contractor. – Limits placed on stacking to max two batteries high. Spill kit and eyewash facility available if a spill or leak does occur. – Regularly scheduled collections to minimise stock at all times. – Training to ensure staff adhere to procedure. – Audits and inspections for monitoring and review.
Tyre Shred Contamination	– Shred is stored inside, in a dedicated, cordoned-off area, protected from weather and cross-contamination with other processes on-site. – Shred is loaded from storage area directly into shipping containers. Any product that leaves the area is routinely picked up/raked up. – Any process water is put through a water treatment plant (oil-water separator) before it is discharged.
Dust	– All areas of the site (bar the DA required gardens) are concrete. All gardens are either grass or woodchip. – All areas of the site are swept on a minimum weekly basis. – A speed limit of 8 kph is imposed to minimise the dust raised by truck and plant movements around the yard.

Identified Hazard	Control Measures
Fire (Air, Water & Land contamination)	– Fire Prevention: Pre-employment arson checks; site security; ignition sources assessed & managed; hot work permit system; site induction; emergency preparedness drills; worker training; cleaning schedule; housekeeping observations; waste storage observations; chemical storage observations; internal & external audits – Fuel loads: Pile dimensions; managed throughput; stock management plan. – Fire spread: Pile & boundary separation; mobile plant; – Fire suppression: hose reels; extinguishers; emergency service access. – Water containment: Concrete is cambered across the site to direct water through a stormwater discharge isolation valve. – Mobile plant on-site to separate tyres on fire from the rest of the pile.
Chemical Spill	– Oils, grease, coolants stored on bunds in the storage shed, undercover to prevent rainwater entering. – Correct disposal of waste as required. – Spill kits stocked and located nearby in the event of a spill or leak. Information and education. – The stormwater system drains to an isolator valve. – Routine inspections, observations and audits conducted as per IPI table to monitor and verify. – Flammable products stored in flameproof, bunded cabinet.
Truck Wash Waste Water	All trucks are either taken off site to a suitably equipped facility for cleaning, or a mobile vehicle washing contractor comes to site. In that situation, all wash water generated is captured and recovered by the contractor and taken off-site

Potential environmental hazards have undergone a risk assessment process, whereby measures have been identified to minimise or prevent any risk of harm to human health or the environment. This process is completed live using a cloud-based integrated management system and can be found at www.skytrust.com.au

8.0 Inventory of Pollutants

Table 3 below provides an inventory of potential pollutants kept at Tyrecycle's Newcastle facility. Specific chemicals can be found in the Newcastle Chemical Register, located within Skytrust; at

each chemical storage location; and in the emergency information box at the front gate. Access to electronic copies of Safety Data Sheets are at each relevant storage location.

Table 3

Potential Pollutant	Maximum Quantity
Diesel	Max 200L
Chemicals	Minor quantities (max 200L) of Class 3 Flammable Liquids, including oil-based fuels, used for plant and equipment operation.
Chemicals	Minor quantities (max 1000L) of lubricants, grease and hydraulic oils, used for plant and equipment storage
Battery Acid	Max 375L

9.0 Safety Equipment

In order to minimise risks to human health or the environment and to contain or control a pollution incident, the site Emergency Response Plan includes the use of the following (see Appendix Two & Three for locations);

- Safety Data Sheets
- Bunds
- Spill kits
- Personal Protective Equipment (PPE)
    - Safety footwear
    - Eye protection
    - High visibility clothing
    - Hearing protection (in certain areas)
- First aid kits
- Fire suppression equipment
- Evacuation procedures

10.0 Pollution Incident Response

Newcastle Contact Details

Title	Contact Details
Operations Manager	0418 680 710
Operations Assistant	0429 026 777
National HSEQ Manager	0422 205 013

10.1. PIRMP activation

The Chief Warden is responsible for activating the PIMRP and following the Chief Warden responsibilities outlined in the Emergency Response Procedure.

10.2. Notifying relevant authorities

Firstly, the Chief Warden is to call 000 if the incident presents an immediate threat to human health or property.

The information reported to external authorities must contain the following information:

NOTIFICATION INFORMATION

1. Time, date, nature, duration and location of pollution incident.
2. Location where pollution is occurring or is likely to occur.
3. Nature, estimated quantity and concentration of pollutant if known.
4. How this happened and what is thought to have caused it.
5. Action taken or proposed to be taken to manage the pollution incident.

If the incident does not require an initial combat agency, or once the 000 call has been made, the Newcastle Operations Manager is to adhere to Emergency Response Procedures.

The CEO and/or National HSEQ Manager will notify relevant external parties as per their duties outlined in the Emergency Response Procedure.

Relevant Authority	Contact Details
Fire & Rescue NSW	1300 729 579 / 000
EPA	13 15 55
Newcastle Public Health Unit	(02) 4924 6477 or (02) 4924 6477 (after hours)
SafeWork NSW	13 10 50

Lake Macquarie Council	(02) 4921 0333

10.3. Communicating with Neighbours and Local Community

In the event of a pollution incident, a suitable Tyrecycle representative will maintain communication with relevant neighbours and the local community. The extent and content of community notification will be determined by Management, based on the nature and extent of the pollution incident. This may be achieved using phone, email or face-to-face communication.

Business Name	Relation	Contact Details
Advantage Communications	Neighbour	1300 264 860
Maxi-Jazz Dance Studio	Neighbour	02 4955 5502

10.4. Managing response of the incident

The Chief Warden is to coordinate the emergency response as per the Chief Warden duties outlined in the Emergency Response Procedure.

Immediate actions to be taken in the event of an emergency must follow the steps contained within site PR600 Emergency Response Procedure. This includes the use of spill kits; first aid kits; the evacuation of people; and the use of fire suppression equipment among other control methods, where applicable.

The Tyrecycle Incident Reporting, Warden, First Aid and Training processes also apply in the event of an emergency.

11.0 Actions to be taken to minimize harm

11.1 During a pollution incident

In the event of a pollution incident employees are to undertake actions as per the Emergency Response Procedure, ensuring that minimizing harm is the priority. This procedure has been designed for implementation at Tyrecycle's Newcastle site to control foreseen emergency situations that can affect occupant safety, plant assets, the environment or the continuity of business operations.

General controls for managing a pollution incident include;

- Visually assess the situation. Undertake emergency response if required
- If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident
- Take direction from Emergency Services and appropriate Regulatory Authorities
- If required seek assistance from specialist consultants/contractors

11.2 Following a pollution incident

If a pollution incident occurs, a detailed investigation will be undertaken as per the Incident Management Procedure.

Within one month of a pollution incident occurring, this PIRMP, along with other relevant plans and procedures, will be formally reviewed and tested to ensure this PIRMP is accurate, current and capable of being performed in a practical and effective manner.

12.0 PIRMP Testing

This PIRMP is tested once a year to ensure that the information in the document is accurate, that legislative references are current and that records are being maintained. This plan will also be tested within one month of any pollution incident occurring. This testing may include;

- Performing a desktop review, and undertaking desktop simulations of incident or potential incidents, and/or
- Simulated training, exercises or drills to ensure the plan is capable of being implemented in a workable and effective manner

Date of Test	Testers	Comments
2011 - 2018	Col Harvey	C & R Tyre Recycling PIRMP test and review schedule
13/08/2019	Sarah Toomey	V1.0 as Tyrecycle created and implemented
13/08/2019	Zoee Kilkelly	Pre-emptive actions and neighbour contact details amended
10/08/2020	Zoee Kilkelly and Tim Huempel	Practical and Desktop assessment performed on PIRMP.
20/10/2020	Tim Huempel	Updated Inventory of Pollutants, legislation references, minor changes to risk controls and formating

13.0 Appendix One – Regional Map

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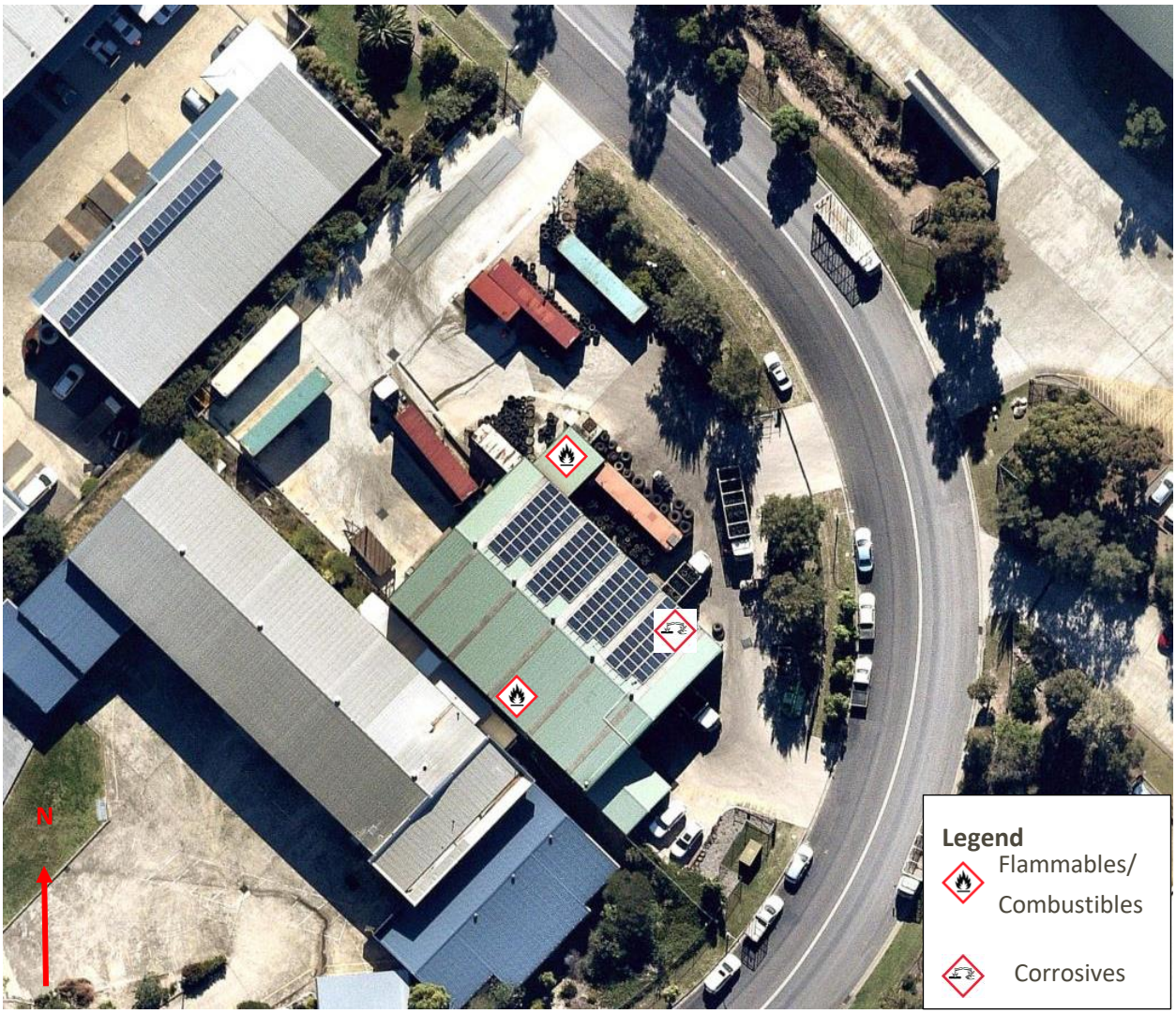
14.0 Appendix Two – Chemical Storage



15.0 Appendix Three – Emergency Evacuation Diagram