



Clean Earth Tyre Recycling Pty Ltd

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**POLLUTION
INCIDENT
RESPONSE
MANAGEMENT
PLAN

OF

CLEAN EARTH
TYRE RECYCLING
PTY LTD**

Revision 10

Dated February 2024

EXECUTIVE SUMMARY

A requirement under Part 5.7A of the *Protection of the Environment Operations Act, 1997* (the POEO Act) imposes an obligation on holders of environmental protection licences to prepare and implement a pollution incident response management plan for each licensed activity.

Offences associated with not preparing the plans or keeping plans at the premises, not testing a plan in accordance with the regulation and not implementing a plan when an incident occurs apply.

Clean Earth Tyre Recycling Pty Ltd encourages tyre recycling and gradually develop a more beneficial reuse of tyres. At present the business is in its infancy and is focused on shredding tyres and obtaining tyres suited to re-treading. Clean Earth Tyre Recycling Pty Ltd has approval to operate a tyre recycling facility at 98-102 Links Road St Marys in the Penrith local government area. Up to 15,000 tonnes per annum of tyres are to be processed and a maximum of 50 tonnes of rubber stored on site at any one time.

Clean Earth Tyre Recycling Pty Ltd holds an environment protection licence number 20767 under the POEO Act to recover and process (by non-thermal treatment) waste tyres as well as for the storage of waste tyres at their site in St Marys. Clean Earth Tyre Recycling Pty Ltd therefore has an obligation to prepare a pollution incident response management plan (PIRMP) under the Act.

The objectives of the PIRMP are threefold:

- To ensure timely and comprehensive communication of a pollution incident to staff, relevant authorities and all other stakeholders affected by the impacts of the pollution incident;
- To identify risks and develop actions to minimise and manage these risks; and
- To ensure the plan is implemented by trained staff and regularly tested for accuracy, currency and suitability.

Requirements for inclusions in a pollution incident response management plan are stipulated in the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* and Part 5.7A of the POEO Act.

The NSW EPA have also prepared *Environmental Guidelines: Preparation of Pollution Incident Response Plans*. This Pollution Incident Response Management Plan has been prepared in accordance with the POEO Act, Regulation and the guidelines.

This plan needs to be put in place prior to the site becoming operational. Reference to Site's Emergency Plan and Environmental Management Plan has been made throughout.

DEFINITIONS

| | |
|---|--|
| Appropriate regulatory authority | Generally, the appropriate regulatory authority is the EPA for licensed premises and local Council for non-licensed premises. There are exceptions to this definition as stated in Clause 6 of the POEO Act. |
| Dangerous goods | Substances that are listed in The Australian Dangerous Goods (ADG) Code or that meet the classification criteria specified in that Code. |
| Environment | <p>As defined in the POEO Act, <i>"environment" means components of the earth, including:</i></p> <ul style="list-style-type: none"><i>(a) land, air and water, and</i><i>(b) any layer of the atmosphere, and</i><i>(c) any organic or inorganic matter and any living organism, and</i><i>(d) human-made or modified structures and areas,</i> <p><i>and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).</i></p> |
| Harm | As defined in the POEO Act, <i>"harm" to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.</i> |
| Immediately | Promptly and without delay |
| Material risk of harm | <p>"Material risk of harm to the environment" is defined under Section 147 of the POEO Act as:</p> <ul style="list-style-type: none">(a) harm to the environment is material if:<ul style="list-style-type: none">(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. |
| Non-scheduled activity | Under the POEO Act, a "non-scheduled activity" means an activity that is not a scheduled activity and is not <u>scheduled development work</u> . |
| Occupier | As defined under the POEO Act, "occupier" of premises means the person who has the management or control of the premises. |

| | |
|--------------------------------|---|
| Pollution | As defined under the POEO Act, "pollution" means: (a) water pollution, or (b) air pollution, or (c) noise pollution, or (d) land pollution. |
| Pollution Incident | The Environmental Guidelines: Preparation of pollution incident response management plans defines a pollution incident 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 any noise.” |
| Pre-emptive action | Actions taken as a measure against possible or anticipated harm such as use of spill containment kits, installation of stormwater cut-off valves and installation of fire-containment water tanks. |
| Premises | As defined under the POEO Act, "premises" includes: (a) a building or structure, or (b) land or a place (whether enclosed or built on or not), or (c) a mobile plant, vehicle, vessel or aircraft. |
| Prevention of pollution | Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs. |
| Safety Data Sheet (SDS) | A Safety Data Sheet (SDS) is a document that describes the chemical and physical properties of a material and provides advice on its safe storage, handling and use. (www.safeworkaustralia.gov.au) |
| Scheduled activity | "scheduled activity" means an activity listed in Schedule 1 of the POEO Act. Scheduled activities must be licensed under the POEO Act. |
| Spill kit | A set of equipment used to isolate or control an accidental overflow or release of a substance or material. |

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Attachments

Attachment 1: Evacuation Plan and Site Plan



1. INTRODUCTION

Clean Earth Tyre Recycling Pty Ltd has recently been granted consent DA15/1483 to operate a tyre recycling facility at 98-102 Links Road St Marys in the Penrith local government area. Approved activities require an Environment Protection Licence for resource recovery, processing of waste tyres (non-thermal treatment) and storage of waste tyres.

Clean Earth Tyre Recycling Pty Ltd is a new business focused on shredding tyres to tyre derived fuel (TDF) and obtaining tyres suited to retreading. The facility is able to process up to 15,000 tonnes per annum of waste tyres and store a maximum of 50 tonnes of rubber at the site. The facility would accept waste tyres and segregate those in a suitable condition to be re-treaded and send these tyres to a retreader. Tyres that are of no further value are shredded and containerised for export as Tyre Derived Fuel (TDF) and fed straight into shipping containers for export.

The site has approval to operate Monday to Friday 7:00am to 5:00pm and employs a workforce of approximately 15 people.

The only dangerous goods on site are in very minor quantities:

- Oxygen and acetylene gas cylinders for welding maintenance (up to 2 oxygen cylinders and 2 acetylene cylinders);
- 15 LPG forklift gas cylinders, 8 stored in a well-ventilated area and one on each of 3 forklifts.
- Diesel in the fuel tank of the diesel-powered shredder (<200L);
- Diesel in the fuel tank of the diesel generator inside a 20foot container (bundling)
- Lubricating oil – C2 combustible liquids (100L)

Identified risks include fire and the resulting contaminated firefighting water generated with potential to pollute soil and groundwater.

Under Part 5.7A of the *Protection of the Environment Operations Act, 1997* (POEO Act), Clean Earth Tyre Recycling Pty Ltd is required to prepare, implement and test a Pollution Incident Response Management Plan (PIRMP). This is aimed at improving the response to pollution incidents and the way they are reported, managed and communicated to regulatory authorities and the community.

This PIRMP has been developed to enable Clean Earth Tyre Recycling Pty Ltd to respond effectively and efficiently to any pollution incident that may occur on site and minimise off site impacts. The purpose of the plan is to prepare key personnel to coordinate an effective response in the event of an incident that would minimise disruption to site operations and the environment.

Clean Earth Tyre Recycling Pty Ltd commits to implementing, regularly reviewing and updating this PIRMP at the St Marys site, and making the plan publicly available.

1.1 LICENSED ACTIVITIES

Clean Earth Tyre Recycling Pty Ltd operates a tyre recycling facility that segregates and processes waste tyres to be retread or for use as tyre derived fuel (TDF). Waste tyres and TDF are also stored at the site. The site needs an environment protection licence (EPL) to undertake premises-based scheduled activities listed in the following table:

Table 1-1: Licenced Activities

| Scheduled Activity | Fee-based activity | Scale |
|--|--------------------------------------|--------------|
| Resource Recovery | Recovery of waste tyres | N/A |
| Waste Processing (non-thermal treatment) | Non-thermal treatment of waste tyres | Any capacity |
| Waste Storage | Waste Tyres | N/A |

The following sub-sections briefly describe the activities undertaken at the site.

1.1.1 Unloading

After weighing on the on-site weighbridge, tyres are manually unloaded and separated so that car and truck tyres that can be re-treaded are placed to one side. The other tyres to be shredded would be placed onto the feed conveyor.

1.1.2 Shredding

Tyres are passed from the conveyor to the shredder, which cuts the rubber into pieces 150–200 mm (6-8 inches) in length by 50–100 mm (2–4 inches) wide, now described as tyre derived fuel (TDF).

1.1.3 Containerising

All Tyre Product (including Bulka Bags with TDF and whole tyre suitable for ret-reading) are fed straight into shipping containers for export.

1.2 AIMS AND OBJECTIVES

Clean Earth Tyre Recycling Pty Ltd is committed to ensuring the safety of their employees, business activities and the environment is maintained at all times. The objectives of this PIRMP are to provide:

- A description and likelihood of hazards to human health and the environment associated with the licensed activity;
- Pre-emptive actions to be taken to minimise risk of harm;
- An inventory of potential pollutants;
- A description of safety equipment and devices used to minimise risks and/or contain a pollution incident;
- 24-hour details of key site contacts and relevant authorities;
- Mechanisms used to provide early warnings to neighbours and the local community;

-
- Actions to minimise risk of harm should an incident occur;
 - Actions to be taken during or immediately following a pollution incident;
 - A detailed set of plans; and
 - Staff training programs relating to implementing the plan.

This PIRMP has been prepared to ensure all risks and potential incidents can be identified and prepare key personnel to coordinate an effective response in the event of an incident that would minimise impacts on human health and the environment. Appropriate means of communication to regulatory authorities and the surrounding community are provided.

2. RELEVANT LEGISLATION & GUIDELINES

In NSW, the preparation and implantation of a Pollution Incident Response Management Plan (PIRMP) applies to all holders of an Environment Protection Licence. This requirement is stipulated under Part 5.7A of the *Protection of the Environment Operations Act, 1997* (POEO Act).

The NSW EPA has also prepared *Environmental Guidelines: Preparation of Pollution Incident Response Plans*.

2.1 PART 5.7A OF PROTECTION OF THE ENVIRONMENT OPERATIONS ACT, 1997

Part 5.7A of the POEO Act specifies:

- Information to be included in the plan (Clause 153C) including the procedures to be followed in notifying a pollution incident to the relevant people and authorities, a detailed description of action to be taken immediately after a pollution incident to reduce or control any pollution and procedures to be followed;
- The plan must be kept at the premises to which the relevant environmental protection licence (EPL) relates (Clause 153D);
- Licensees must test the plan in accordance with Clause 98E of the Regulation (Clause 153E); and
- Licensees must immediately implement the plan if a pollution incident occurs in the course of an activity so that material harm to the environment is caused (Clause 153F).

Information in the plan that must be made publicly available includes:

- Procedures for contacting relevant regulatory authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
- Procedures for communicating with the community.

This information will be made readily available as follows:

- At the site where the activities are carried out – as a controlled document and a hard copy maintained by the Site Manager ; and
- On the company website when available or to any person who makes a written request.

Any personal information in the plan within the meaning of the *Privacy and Personal Information Protection Act 1998* may be excluded from public exhibition.

2.2 POEO (GENERAL) AMENDMENT (POLLUTION INCIDENT RESPONSE MANAGEMENT PLANS) REGULATION 2012

The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012 specifies matters to be included in pollution incident response management plans. These requirements are specified in Clause 98C of the regulation and are detailed in the following table.

Table 2-1: Requirements under the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012

| No. | Requirement |
|-----|--|
| (a) | a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity) |
| (b) | the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood. |
| (c) | details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity |
| (d) | an inventory of potential pollutants on the premises or used in carrying out the relevant activity |
| (e) | the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates |
| (f) | a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident |
| (g) | the names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident |
| (h) | the contact details of each relevant authority referred to in section 148 of the Act |
| (i) | details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on |
| (j) | the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on |
| (k) | a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises |
| (l) | a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk |
| (m) | the nature and objectives of any staff training program in relation to the plan |
| (n) | the dates on which the plan has been tested and the name of the person who carried out the test |
| (o) | the dates on which the plan is updated |
| (p) | the manner in which the plan is to be tested and maintained |

3. HAZARDS AND RISKS

This section provides a description of the main hazards to human health and the environment, the likelihood of these occurring and details of any circumstances that may increase the chances of the risk occurring.

3.1 INVENTORY OF POTENTIAL POLLUTANTS

The table below provides a list of potential pollutants on the site, their location, source and approximate quantity if relevant.

Due to the nature of the site operations, there are no significant potential pollutants located at the site. Pollutants may be generated if a fire were to occur on the site that engulfs tyre stacks or containers of tyre derived fuel (rubber pieces).

Table 3-1: Potential Pollutants on Premises

| Pollutant | Quantity / Source | Location |
|---|--------------------------|--|
| Tyre Stacks | Not more than 50 tonnes | In shelving within Building |
| Tyre Derived Fuel (rubber pieces) | | Within containers at the rear of the premises |
| Diesel | Shredder fuel tank <200L | Shredder fuel tank within building |
| Diesel | Diesel Generator | 20 foot container outside |
| Oxygen and acetylene gas cylinders set | 2 to 4 cylinders | Indoors (in accordance with AS 4289) |
| LPG gas cylinders | 12 cylinders | Locked cage outdoors (in accordance with AS 1596) |
| Lubricating oil (C2 Combustible Liquid) | 100L | Within machinery and in minor packages within building |

3.2 HAZARDS TO HUMAN HEALTH

Hazards are related to the potential for a fire resulting in contaminated firefighting water and air pollutants associated with a tyre fire such as particulates, carbon monoxide (CO), sulfur oxides (SOx), oxides of nitrogen (NOx), and volatile organic compounds (VOCs).

Other hazards are related to the potential for stormwater contamination polluting waters causing potential human health issues.

3.3 RISK ASSESSMENT

The level of risk for the main hazards listed in the previous section occurring is assessed using the Risk Analysis Matrices in Figure 3-1.

Risk is identified in terms of hazards. To determine the level of risk from a hazard, the likelihood and consequence (level of potential impact) of the hazard occurring are analysed.

Likelihood involves determining how likely an event is to occur. It is the chance that something might happen and is defined for the purposes of this assessment in the following table.

HOW LIKELY IS AN EVENT TO OCCUR?

LIKELIHOOD

| Level | Descriptor | Description |
|-------|----------------|---|
| A | Almost Certain | Very likely. The event is expected to occur in most circumstances. |
| B | Likely | Strong possibility. The event will probably occur in most circumstances. |
| C | Possible | The event might occur at some time. |
| D | Unlikely | Not expected. There is a slight possibility the event could occur at some time. |
| E | Rare | Highly unlikely. The event may occur only in exceptional circumstances. |

Consequence is defined according to the following table:

WHAT ARE THE WORST-CASE SCENARIO CONSEQUENCES?

CONSEQUENCES OR IMPACT

| Level | Descriptor | Description |
|-------|---------------|---|
| 1 | Insignificant | Confined on-site environmental impacts able to be promptly rectified. No injuries. Financial loss less than \$2,000 |
| 2 | Minor | Confined environmental impacts requiring short term recovery with potentially little or no off-site impacts. First Aid treatment. Financial loss \$2,000 to \$20,000 |
| 3 | Moderate | Confined environmental impacts requiring medium term recovery both on-site and off-site. Medical treatment required. Financial loss \$20,000 to \$200,000 |
| 4 | Severe | Unconfined environmental impacts requiring long term recovery and leaving residual damage both on-site and off-site. Extensive injuries, loss of product capability. Financial loss \$200,000 to \$1M |
| 5 | Catastrophic | Widespread environmental impact requiring long term recovery and leaving major damage both on-site and off-site. Death. Financial loss more than \$1M |

Figure 3-1: Risk Matrix

| Likelihood | LEVEL OF RISK Consequence | | | | |
|---------------------------|------------------------------|---------------|---------------|---------------|-------------------|
| | Insignificant 1 | Minor 2 | Moderate 3 | Severe 4 | Catastrophic 5 |
| A (almost certain) | Low Risk | Moderate Risk | High Risk | High Risk | High Risk |
| B (likely) | Low Risk | Moderate Risk | High Risk | High Risk | High Risk |
| C (possible) | Low Risk | Moderate Risk | Moderate Risk | High Risk | High Risk |
| D (unlikely) | Low Risk | Low Risk | Moderate Risk | Moderate Risk | Moderate Risk |
| E (rare) | Low Risk | Low Risk | Low Risk | Moderate Risk | Moderate Risk |

The area shown in red indicates a high level of risk which is intolerable and where risk reduction is required through controls or mitigation measures. This requires the reduction of frequency and/or consequence.

The area shown in yellow indicates a moderate level of risk. Whilst the risk is not unacceptable, there should be practical measures taken to lower the risk if economically viable.

The area shown in green indicates a low level of risk and is broadly considered to be acceptable. Further risk mitigation may not be required / appropriate. However, low and accepted risks should be monitored and routinely reviewed to ensure that they remain acceptable.

Table 3-2 provides a risk assessment of the potential hazards that could occur at the site with no control measures in place. Table 3-3 provides a risk assessment with all safeguards, controls and mitigation measures in place.

Table 3-2: Hazard and Likelihood Risk Assessment with no Control Measures

| Hazard/Incident | Likelihood | Consequence | Level of Risk | Activities which may increase the potential of the hazard occurring |
|-------------------------|------------|---------------|----------------------|--|
| Chemical spill | Possible | Minor | Moderate Risk | Vehicle collision Plant or equipment failure |
| Contaminated stormwater | Likely | Insignificant | Moderate Risk | Excessive rainfall |
| Fire | Possible | Catastrophic | High Risk | Plant or equipment failure Smoking Spontaneous combustion Bushfire Arson |
| Asbestos | Unlikely | Minor | Low Risk | Customer breach Illegal dumping |
| Dust | Possible | Moderate | Moderate Risk | Plant or equipment failure together with dry weather and high wind. Excessive truck movements |
| Noise | Unlikely | Minor | Low Risk | Plant or equipment failure Excessive truck noise |

Table 3-3: Hazard and Likelihood Risk Assessment with Control Measures in place

| Hazard/Incident | Control Measures | Likelihood | Consequence | Level of Risk |
|-------------------------|---|------------|---------------|---------------|
| Chemical spill | Designated storage areas Spill kit Building bunding Site Bunding Stormwater isolation EMP | Unlikely | Insignificant | Low Risk |
| Contaminated stormwater | Designated storage areas Spill kit Building bunding Site Bunding Stormwater isolation EMP | Unlikely | Insignificant | Low Risk |
| Fire | Fire protection equipment Designated storage areas Spill kit Building bunding Site Bunding Stormwater isolation Emergency Plan EMP Workplace inspection | Unlikely | Minor | Low Risk |
| Asbestos | Workplace inspection | Unlikely | Minor | Low Risk |
| Dust | EMP Air Control Procedure Preventative maintenance Workplace inspection | Unlikely | Minor | Low Risk |
| Noise | EMP Noise Management Procedure Preventative maintenance Workplace inspection | Unlikely | Minor | Low Risk |

4. MINIMISING RISK OF HARM

This section details the actions to be taken immediately following a pollution incident including pre-emptive actions, use of safety equipment, early warning mechanisms and reducing the risk of harm.

4.1 PRE-EMPTIVE ACTION

Clean Earth Tyre Recycling Pty Ltd would implement a number of pre-emptive actions to prevent or minimise any risk of harm to human health or the environment.

Pre-emptive actions include but are not limited to the following:

- Spill containment kits,
- Stormwater isolation valves,
- A fire hydrant system in accordance with the NCC and AS 2419.1:2005/Amdt 1-2007;
- A hose reel system in accordance with the NCC and AS 2441:2005/Amdt 1-2009;
- Foam injection kits and 20L of foam;
- Fire extinguishers in accordance with the NCC and AS 2444–2001;
- Fire services maintained in accordance with AS 1851;
- Emergency lighting and exit signage in accordance with the NCC and AS 2293;
- An occupant warning system in accordance with the NCC and AS 1670.4;
- The site bunding to be maintained in good condition;
- The building doorways bunded;
- Covers for the stormwater pits and discharge points to the stormwater system fitted with an isolation valve;
- Trained personnel in specific emergency procedures and EMP procedures;
- Preventative Maintenance Schedule;
- Weekly Workplace Inspection;
- Employees, visitors and contractors are required to undergo a site induction and competency test;
- Strict control of ignition sources.

4.2 SAFETY EQUIPMENT

Safety equipment includes:

- Fire blankets;
- First aid kits;
- Personal Protective Equipment (PPE) gear including: Ear muffs, eye protection, gloves, high visibility vests, safety boots, work clothes.

4.2.1 Alarm System

The site is fitted with an Occupant Evacuation System as required by Specification E1.5 of the Building Code of Australia. The Occupant Evacuation System complies with Clause 3.22 of AS 1670, and is linked and activated by the Automatic Sprinkler System. A warning would be sent throughout all occupied areas.

4.3 FIRST AID

In the event of a pollution incident impacting the health of a person, the following should be followed:

- Dial 000 – emergency services if the person has suffered serious injury and needs immediate medical attention;
- Conduct basic first aid if trained to do so.
- Report the incident on the incident investigation form provided in the Site’s Emergency Plan.

4.4 EARLY WARNING MECHANISMS

For any incident that has a risk on human health or the environment external to the site, early warnings and regular updates will be provided to any premises or neighbouring facility or resident likely to be affected. This would be undertaken by key individuals.

A variety of communication mechanisms are available to provide early warnings and regular updates depending on the type, scale and nature of the incident, including:

- Telephone calls and emails
- Community
- Letterbox drops
- Door knocking

Specific information would be provided to potentially affected premises via the above avenues to minimise the risk of harm as appropriate to the circumstances.

4.5 CORRECTIVE AND PREVENTATIVE ACTION PROCESS

The system has been established to manage incidents in the longer term to ensure that appropriate follow up action is taken. This process is detailed in the Site’s Environmental Management Plan. Key elements of the system include:

- Reporting;
- Investigation; and
- Implementing corrective actions.

5. MAPS AND PLANS

Maps are included as attachments to this plan.

6. CONTACT DETAILS

Site personnel with specific responsibilities for incident response and management need to be contacted in the event of an incident. This section also provides the full contact details of the relevant regulatory authorities.

6.1.1 Site Contacts

This section contains the names, positions and 24-hour contact details of those key individuals who:

- (i) are responsible for activating the plan, and
- (ii) are authorised to notify relevant authorities under section 148 of the Act, and
- (iii) are responsible for managing the response to a pollution incident.

The following table lists the key individuals and their responsibilities. These key individuals are listed in order of who to contact in the event of a pollution incident at the site.

Table 6-1: Site Contacts – Senior Management

| Contact Name | Telephone | Position / Responsibilities |
|-------------------|--------------|--------------------------------|
| Camillia Zulinska | 0450 464 040 | Managing Director |
| Mark Kawecka | 0407 429 997 | General Manager |
| Kevin Fullerton | 0422 076 557 | Logistics Manager/Chief Warden |

6.1.2 Regulatory Authority Contacts

The contact details of each relevant authority referred to in section 148 of the Act that are relevant to this site include:

NSW EPA – Environment Line 131 555

Penrith City Council – (02) 4732 7777

Ministry of Health (02) 9391 9000

WorkCover on 13 10 50 (WorkCover will ask for the

ABN which is 25 645 157 615)

Fire and Rescue NSW (non-emergencies) – 1300 729 579

6.1.3 Surrounding Area Receptors

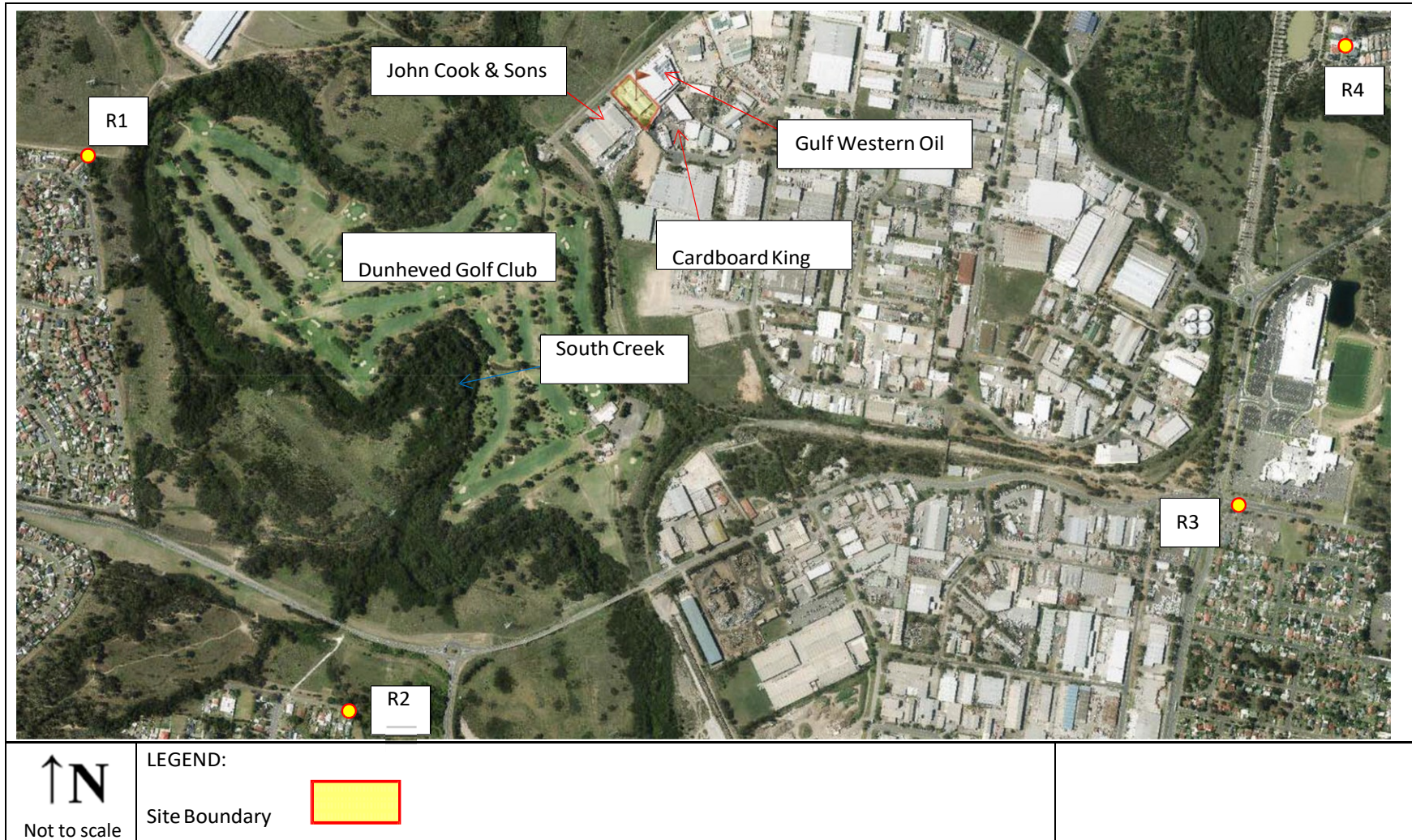
The nearest sensitive residential receptors and neighbouring industrial facilities have been identified in the following Table 6-2 and are shown in Figure 6-1.

Table 6-2: Surrounding Area Receptors

| Receptor | Nature of Occupancy/Sensitivity | Approximate Distance | Contact Details | Address |
|---|----------------------------------|----------------------|-----------------|--------------------------------------|
| John Cook & Sons Pty Ltd Woodworking Supply Store | Neighbouring Industrial facility | adjacent SW | 9833 0355 | 104-116 Links Road, St Marys |
| Gulf Western Oil | Neighbouring Industrial facility | adjacent E | 9673 9600 | 92-96 Links Road, St Marys |
| Cardboard King | Neighbouring Industrial facility | adjacent S | 9673 1660 | 8 Kommer Place, St Marys |
| Dunheved Golf Club | Nearby recreational facility | 200 m SW | 9623 0239 | 176 Links Road, St Marys |
| R1 | Nearest Residential Receptor | 1180 m NW | - | 21 Hartog Drive, Wellington County |
| R2 | Nearest Residential Receptor | 1490 m SE | - | 66 Reid Street, Werrington |
| R3 | Nearest Residential Receptor | 1600 m SE | - | 199 Forrester Road North, St Marys |
| R4 | Nearest Residential Receptor | 1500 m E | - | 12 Townsend Crescent, Ropes Crossing |

Ecological receptors include the nearest natural waterway, South Creek which is approximately 150 m north-east and 230 m south-west of the site, see Figure 6-1. Ropes Creek is located approximately 1060m north-east of the site. These waterways are part of the Hawkesbury-Nepean River system.

Figure 6-1: Surrounding Area Receptors



7. RESPONSE ACTIONS FOR POLLUTION INCIDENTS

An Emergency Control Organisation (ECO) has been established for the site and consists of a group of site personnel that has the responsibility of providing first response action to an emergency in terms of organising the necessary resources, communications, evacuation of personnel and implementing any corrective actions that may be necessary to return the emergency situation back to normal. The same applies for a pollution incident. Specific details of the ECO are provided in the Emergency Plan.

A simple flowchart detailing how to respond in the event of a pollution incident is provided as Figure 7-1.

7.1 IMMEDIATE ACTIONS

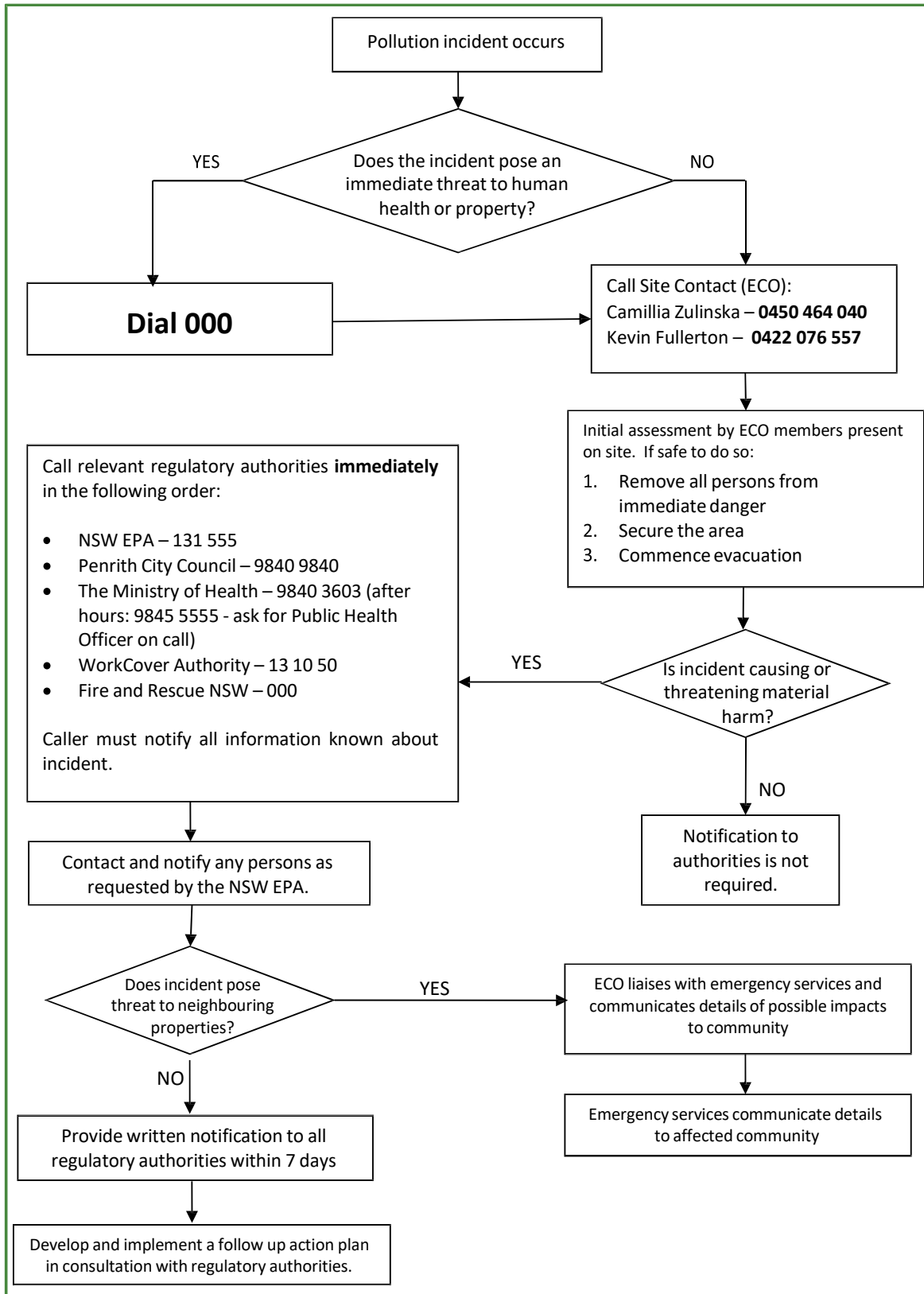
In the event of a pollution incident, the first response of personnel on site based on their initial assessment is to phone 000 in an emergency.

Initial assessment needs to be made by ECO members present on site. If safe to do so:

1. Remove all persons from immediate danger
2. Secure the area
3. Commence evacuation

If the pollution incident is causing or threatening material harm, regulatory authorities need to be notified as per Section 7.2.

Figure 7-1: How to respond in the event of a Pollution Incident



7.2 NOTIFICATION OF A POLLUTION INCIDENT

7.2.1 When to Notify?

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it **immediately**.

7.2.2 How to notify

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service

If the incident does not present an immediate threat, or once the initial 000 call has been made:
Notify the relevant authorities in the following order:

NSW EPA – Environment Line 131 555

Penrith City Council – (02) 4732 7777

Ministry of Health (02) 9391 9000

WorkCover on 13 10 50 (WorkCover will ask for the ABN)

Fire and Rescue NSW (non-emergencies) – 1300 729 579

Notify other persons as required by the EPA.

7.2.3 What to Notify?

Section 150 of the POEO Act specifies relevant information about a pollution incident to be given as follows:

(a) the time, date, nature, duration and location of the incident,

(b) the location of the place where pollution is occurring or is likely to occur,

(c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,

(d) the circumstances in which the incident occurred (including the cause of the incident, if known),

(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,

(f) other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

7.3 INCIDENT INVESTIGATION

Incident investigation and reporting shall be undertaken in accordance with:

- Incident reporting procedure (Emergency Plan); and
- Corrective and Preventative Actions Procedure (Environmental Management Plan)

7.4 INCIDENT REPORTING & FOLLOW UP

Written notification to all of relevant regulatory authorities needs to be undertaken within 7 days of the incident. Information to be included is provided in the Site's Environment Protection Licence.

A follow up action plan would then be developed and implemented in consultation with the relevant regulatory authorities.

8. STAFF TRAINING

Clean Earth Tyre Recycling Pty Ltd employees and contractors must complete a number of training inductions in order to undertake work on site. Specific training is required for the ECO and Senior Management is specified in the Site's Emergency Plan and Environmental Management Plan respectively.

Specifically, training to be included in the induction shall include:

- Response actions for dealing with an emergency or pollution incident – specifically for anyone involved in or witness to a pollution incident in relation to who and when to notify site contacts.
- Individual responsibilities and the responsibilities of key site contacts in relation to the PIRMP.

Specific training on how to respond in the event of a pollution incident as described in Figure 7-1 would need to be undertaken by staff members with key responsibilities including:

- ECO members; and
- Senior Management (refer to Table 6-1);

These staff members would also need to be aware of any specific responsibilities in relation to the pollution incident response management plan.

9. TESTING OF PLAN

Pollution Incident Response Management Plans must be tested routinely every 12 months and within one month of any pollution incident that warrants reporting.

Testing of the PIRMP is incorporated with the testing of the existing emergency plan and needs to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner.

Testing must cover all components of the plan including the effectiveness of staff training.

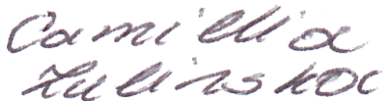
This is undertaken as follows:

- Annual review of PIRMP and emergency plan standard procedures to ensure all information is accurate and up to date;
- Regular drills.

Records of drills and reviews are maintained including:

- The dates on which the plan has been tested and updated;
- The name of the person/s who carried out the test/drill/review;
- If a drill is undertaken, the details of what was tested, how effective the drill was and any changes required to the plan / procedures.

This concludes the report.

A handwritten signature in dark ink, appearing to read "Camillia Zulinska".

Camillia Zulinska
Managing Director

10. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Clean Earth Tyre Recycling Pty Ltd, as per our agreement for providing environmental services. Only Clean Earth Tyre Recycling Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Clean Earth Tyre Recycling Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

11. REFERENCES

New South Wales Consolidated Acts, 1997. *PROTECTION OF THE ENVIRONMENT OPERATIONS ACT*. [Online]

Available at: http://www.austlii.edu.au/au/legis/nsw/consol_act/poteoa1997455/

NSW EPA, 2012. *Environmental guidelines: Preparation of pollution incident response management plans*. [Online]

Available at: <http://www.epa.nsw.gov.au/resources/legislation/201200227egpreppirmp.pdf> NSW

Government, 2012. *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation*. [Online]

Available at: <http://www.legislation.nsw.gov.au/regulations/2012-54.pdf>

Standards Australia, 2012. *AS 1851-2012 Routine service of fire protection systems and equipment*. [Online]

Available at: <http://infostore.saiglobal.com/store/details.aspx?ProductID=1600801>

Standards Australia, 2001. *AS 2444-2001 Portable fire extinguishers and fire blankets - Selection and location*. [Online].

Standards Australia, 2004. *AS 1670.1-2004 Fire detection, warning, control and intercom systems - System design, installation and commissioning - Fire*. [Online]

Available at: <https://infostore.saiglobal.com/store/details.aspx?ProductID=236142>

Standards Australia, 2004. *AS 1670.4-2004 Fire detection, warning, control and intercom systems - System design, installation and commissioning - Sound systems and intercom systems for emergency purposes*. [Online]

Available at: <https://infostore.saiglobal.com/store/details.aspx?ProductID=312955>

Standards Australia, 2005. *AS 2293 Set-2005 Emergency escape lighting and exit signs Set on CD*. [Online]

Available at: <http://infostore.saiglobal.com/store/details.aspx?ProductID=264221>

Standards Australia, 2005. *AS 2419.1-2005 Fire hydrant installations - System design, installation and commissioning*. [Online]

Available at: <http://infostore.saiglobal.com/store/details.aspx?ProductID=270529>

Standards Australia, 2005. *AS 2441-2005 Installation of fire hose reels*. [Online]

Available at: <http://infostore.saiglobal.com/store/details.aspx?ProductID=271143>

Standards Australia, 2014. *AS/NZS 1596:2014 The storage and handling of LP Gas*. [Online]

Available at: <https://infostore.saiglobal.com/store/details.aspx?ProductID=1728387>

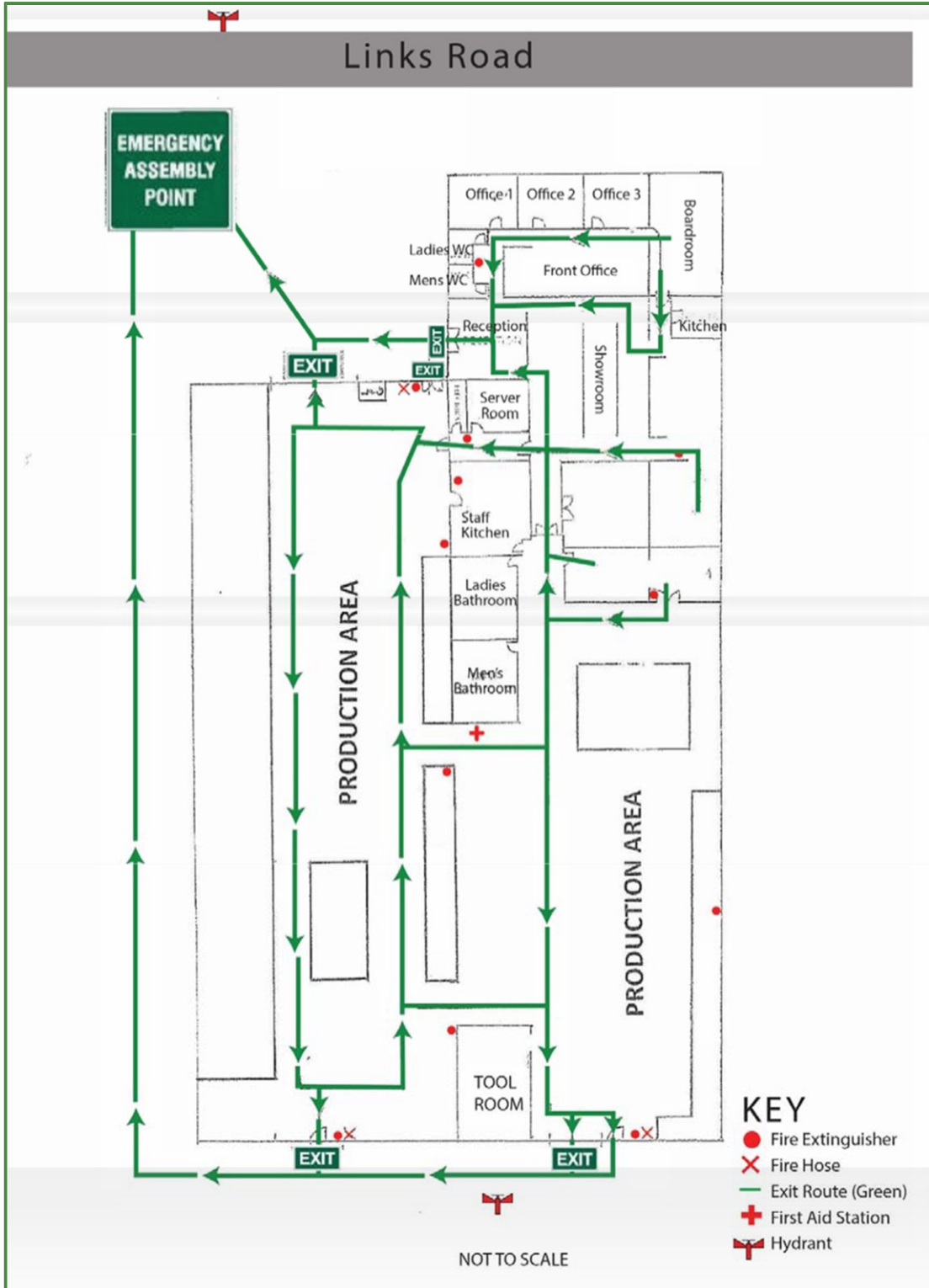
Standards Australia, 2016. *AS 4289-1995 (R2016) Oxygen and acetylene gas reticulation systems*. [Online]

Available at: <https://infostore.saiglobal.com/store/details.aspx?ProductID=312955>

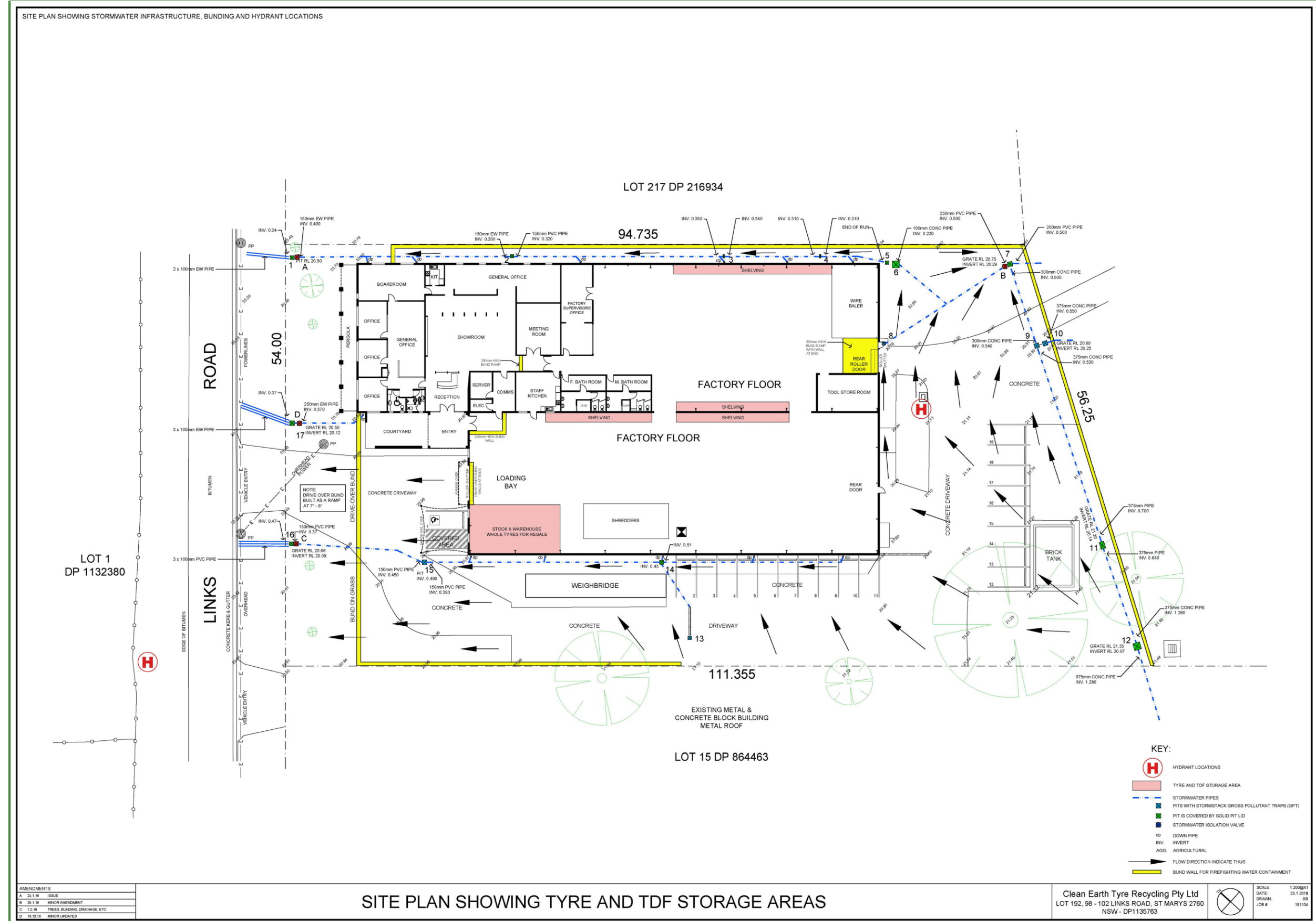
ATTACHMENTS

Attachment 1: Evacuation Plan and Site Plan

Evacuation Plan



Site Plan



SITE PLAN SHOWING TYRE AND TDF STORAGE AREAS