



EBH Environmental
13 Craftsman Avenue, Berkeley Vale
Pollution Incident Response Management Plan

July 2015

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Review Register

Version	Date	Reviewed By	Manner of Testing	Summary of changes

1. Introduction

EBH Environmental Services Pty Ltd (EBH) operates a Waste Management Facility for the recycling and recovery of construction and demolition (C&D) waste at 13 Craftsman Avenue, Berkeley Vale, NSW. The operation of the site involves the acceptance, temporary storage and processing of construction and demolition waste which is predominantly segregated, crushed and screened, and the recovered aggregates stockpiled and sold off site.

Residual material and waste generated is segregated separately on site and disposed of at licenced waste management facilities off site.

1.1 Purpose and scope

The *Protection of Environment Operations Act 1997* (POEO Act) requires holders of an Environmental Protection Licence (EPL) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

As a future holder of an EPL, EBH is required to comply with the POEO Act and as such this document has been prepared to satisfy the PIRMP requirement.

The objectives of this plan are to:

- Address the relevant statutory requirements, including development consent conditions, legislation and policy.
- Outline protocols for the comprehensive and timely communication about a pollution incident.
- Identify potential pollution incident risks and outlines actions to minimise and manage those risks.
- Outline protocols for the implementation of the plan and associated staff training.
- Detail the monitoring, reporting and reviewing requirements of the plan to ensure it is regularly tested for accuracy, currency and suitability.
- Establish responsibilities and accountabilities of the plan.

This PIRMP should be read in conjunction with other relevant management plans for the site including the Environmental Management Plan prepared by GHD dated 2014.

The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined by the POEO Act (see 4.1).

2. Statutory Requirements

EBH's statutory obligations in regard to this plan and material harm incident reporting are contained in the development consent, relevant licences and permits and other legislation and guidelines. These are described further below.

2.1 Development Consent

The site operates under Development Consent 3298/01 granted on 1 July 2002 by Wyong Shire Council (Council). An application to modify the Development Consent DA/3298/2001/B was approved by Council on 20 June 2006.

The Development Consent specifies a variety of conditions to be met by EBH to minimise environmental impacts of the facility. These are incorporated in this PIRMP where applicable.

2.2 Protection of the Environment Operations Act 1997

Section 5.7A of the POEO Act and the *Protection of the Environment Operations (General) Regulation 2009* (POEO(G) Regulation) outlines the specific requirements for inclusion in a PIRMP.

Table 1 lists the information required in a PIRMP as per Section 153C of the POEO Act and details where this information is presented in this PIRMP.

Table 1 PIRMP Information requirement (POEO Act)

Information Required	Section
a) The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:	5
(i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and	5.1
(ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and	5.1
(iii) any persons or authorities required to be notified by Part 5.7,	5.1
b) A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,	5.1.3
c) The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,	5.1.2
d) Any other matter required by the regulations.	See Table 2

Table 2 lists the information required in a PIRMP as per Section 98C of the POEO(G) Regulation and details where this information is presented in this PIRMP.

Table 2 PIRMP information requirement (POEO (General) Regulation)

Information Required	Section
a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),	3.2
b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	3.2
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,	3.4
d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity,	3.2
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,	3.2
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,	3.4
g) 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,	5.1.1
h) The contact details of each relevant authority referred to in section 148 of the Act,	5.1.2
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,	6.2
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,	3.4
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,	Figure 1
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,	5.1.3
m) The nature and objectives of any staff training program in relation to the plan,	6.1
n) The dates on which the plan has been tested and the name of the person who carried out the test,	6.2
o) The dates on which the plan is updated,	6.2
p) The manner in which the plan is to be tested and maintained.	6.2

3. Site Details

3.1 Overview

The operation of the site involves the acceptance, temporary storage and processing of construction and demolition waste which is predominantly segregated, crushed and screened, and the recovered aggregates stockpiled and sold off site.

Residual material and waste generated is segregated separately on site and disposed of at licenced waste management facilities off site.

Figure 1 presents an overview of the site and its key features.

3.2 Major hazards

The following potential hazards to human health and the environment may occur from incidents on the site such as:

- Implosion, explosion or fire.
- Escape, spillage or leakage of hazardous substances.
- Contamination of natural waterways (streams, creeks, rivers, etc.) or public drains.
- Failure/ breakage of pipeline carrying effluent, hydrocarbons, dirty water or chemicals.
- Excessive/harmful air emissions (dust, smoke, fumes, etc).
- Excessive/harmful noise or vibration.
- Tracking of mud from worksite.

3.3 Potential pollutants

The primary hazardous materials and chemicals (including fuels) used and stored on site include:

- Diesel Fuel.
- Oil and Lubricant.
- Grease.
- Hydraulic Oil.

3.4 Pre-emptive actions to minimise or prevent any risk of harm

Table 1 contains a list of the key pre-emptive actions applied on site to minimise the risk of the potential hazards and incidents.

In addition to the controls listed in Table 1, all employees and contractors are to wear appropriate Personal Protective Equipment (PPE) and undergo appropriate safety and environmental training.

Table 3 Major hazards and pre-emptive actions

Hazard	Pre-emptive action
Implosion, explosion or fire	<ul style="list-style-type: none"> • General purpose fire extinguishers and fire extinguishers suitable for control of oil/fuel fires will be available on all mobile plant, workshop/ offices and vehicles. • Personnel on site will be familiar or trained in the use of fire-fighting equipment. • Firefighting will be maintained regularly. • Fire detection and control systems will be in place and regularly inspected.
Escape, spillage or leakage of hazardous substances	<ul style="list-style-type: none"> • An appropriate spill kit is to be kept on site at all times and any spillage is to be immediately cleaned up. In the event of a large or hazardous spill, the fire brigade, police, ambulance and EPA would be contacted as appropriate. • Onsite refuelling and major maintenance shall be avoided as far as practicable. If required it shall be undertaken in a designated area with appropriate bunding and surface protection to prevent contamination. • Vehicles and plant on site will be inspected and maintained as required to minimise leaks and potential spills. • All fuel, oil and chemicals stored on site will be stored in accordance with AS 1940 in bunded areas on site to prevent leaching, leaking or other transfer of material into stormwater drains. • Preventing the use of underground storage tanks. • Safety Data Sheets for all hazardous substances stored on site will be available on site. • Material spillage on roads and pathways is to be cleaned up immediately.
Leak/spillage of contaminated stormwater	<ul style="list-style-type: none"> • All erosion and sediment control measures are to be inspected on a regular basis (minimum weekly) and within 24 hours of rainfall events and any rectification measures undertaken immediately. • The Enviropod system (below-ground system for sediment removal) and sand filters (installed prior to Enviropods) are to be inspected on a regular basis as part of the weekly environmental inspection.
Excessive dust emissions which are carried offsite	<ul style="list-style-type: none"> • During periods of high winds, activities would cease when unacceptable levels of visible dust emissions are moving off-site, until adequate control measures are implemented or conditions improve. • Raw material will be wetted prior to crushing to minimise dust emissions. • Crusher and screens will not be operated during high wind conditions to minimise unacceptable levels of visible dust emissions moving off-site. • All plant and machinery will be turned off when idling. • Stockpiled material would be watered as required. • Stockpiles will be maintained at a height no greater than 3 m. • Haulage vehicles carrying materials off site will be appropriately covered.

4. Incident management

4.1 Pollution incident

A pollution incident is defined in the POEO Act 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.”

Potential pollution incidents for the facility are described in Section 3.2.

4.2 Material harm

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

“(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.

4.3 Legal duty to notify

All EBH employees and contractors are responsible for **immediately** alerting management personnel to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale.

4.4 Key site contacts

The contact details for key individuals who are responsible for activating this plan, including notifying authorities and manage the response to a pollution incident as provided in Table 4 below.

Table 4 Key site contacts

Name	Role	Office Number	Mobile Number
David Burgun	Managing Director	02 4388 3165	0427 771 703

5. Incident response protocol

5.1 Response protocol

As discussed in Section 4.3, the notification of an environmental incident is the responsibility of all site and contractor personnel. In the event of an incident, the response protocol presented in Figure 1 must be implemented.

In the case of an environmental incident, prior to any other action, the site must contact 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site, and
- Contain the pollution incident.

5.1.1 Immediate internal incident notification process

The following process is to be followed by all employees, contractors and suppliers of EBH in the event that a Pollution Incident occurs on site:

- 1) Immediately notify the person responsible for managing the site (i.e. shift supervisor);
- 2) If there is an immediate threat to human health or property, then the shift supervisor must call 000 IMMEDIATELY;
- 3) Contact should also be made with any members of the community who may be directly impacted by the incident;
- 4) The shift supervisor must then contact one of the Key Contacts listed in Section 4.4 and provide the following details:
 - Exact location of the incident;
 - Nature and extent of the incident; and
 - Whether First Aid or Emergency Services were called.

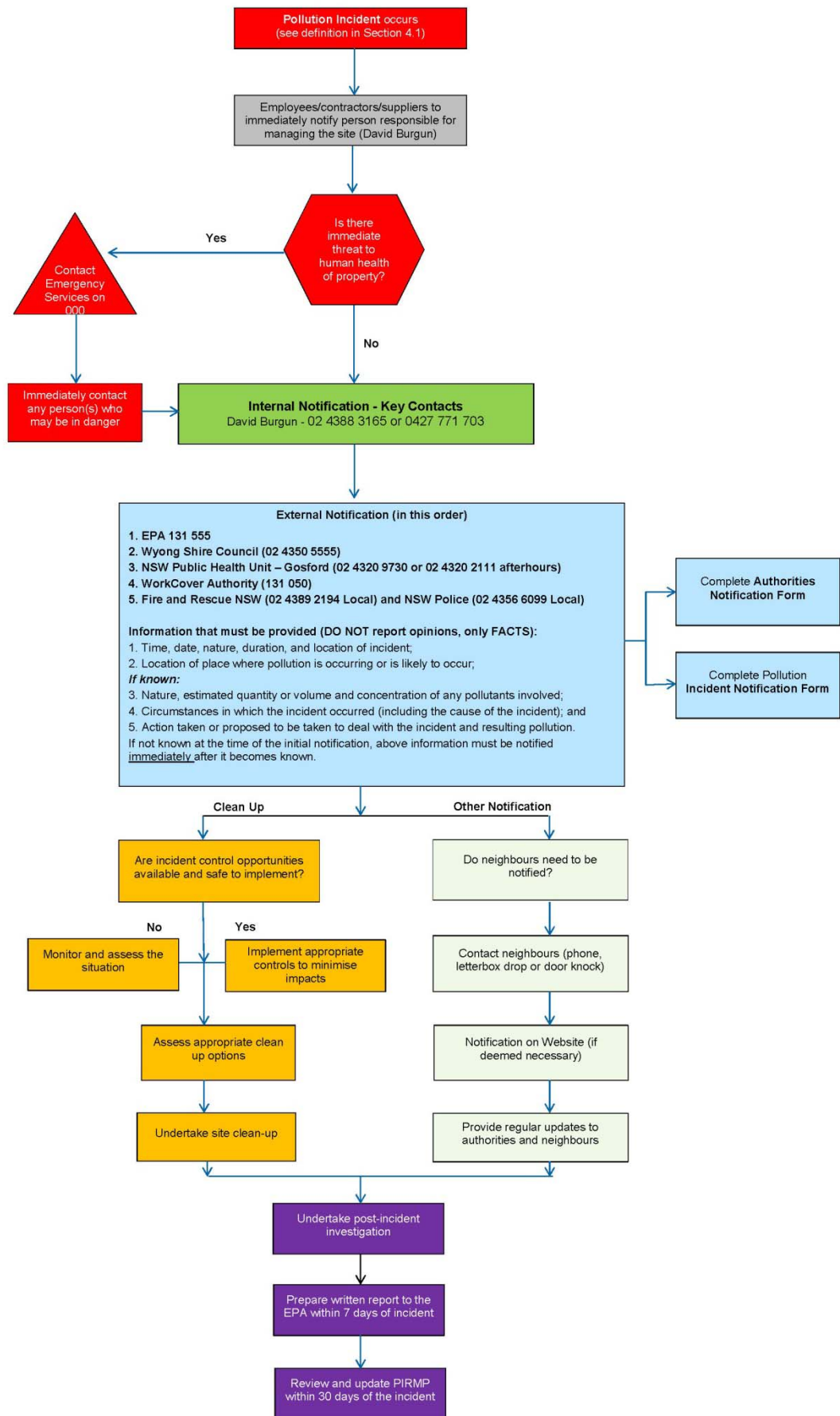


Figure 1 Incident Response Protocol

5.1.2 Notification of pollution incident to external authorities

The Key Contact (or Responsible Person) is responsible for providing the External Notifications to relevant authorities, IMMEDIATELY after they become aware of the Pollution Incident. These notifications must be undertaken in the order described below:

1. EPA 131 555
2. Wyong Shire Council (02 4350 5555)
3. NSW Public Health Unit – Gosford (02 4320 9730 or 02 4320 2111 afterhours)
4. WorkCover Authority (131 050)
5. Fire and Rescue NSW (02 4389 2194 Local) and NSW Police (02 4356 6099 Local)

The following information must be provided to the relevant authorities:

1. Time, date, nature, duration and location of incident;
2. Location of the place where pollution is occurring or is likely to occur; and

If known:

3. Nature, estimated quantity or volume and concentration of any pollutants involved;
4. Circumstances in which the incident occurred (including the cause of the incident); and
5. Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.

If any of the above information is not known at the time the Pollution Incident is reported to any of the Authorities, then that information should be notified to the Authorities immediately after it becomes known. Only details that are confirmed to be accurate are to be reported.

5.1.3 Incident response and post-notification procedures

The following general clean up procedure is to be followed:

- Assessment - Assess best clean up procedures for each incident based on the pollutant and site issues.
- Remedial Action - Remove contaminated soil, wastewater and used spill equipment to an appropriate place within the licensed premises for licensed waste disposal and/or remediation.
- Ongoing Actions - Following an incident the following must be undertaken:
 - Undertake further monitoring/ testing if required;
 - Complete incident report;
 - Organise restocking of spill equipment;
 - Complete reports to Authorities, as necessary; and
 - Implement corrective actions to avoid reoccurrence.

5.1.4 Incident reporting

Within 7 days from the date on which the incident occurred, a detailed report must be submitted to the EPA including the following information:

- Describe the date, time, and nature of the incident;
- Identify the cause (or likely cause) of the incident;
- Describe what action has been taken to date; and
- Describe the proposed measures to address the incident.

If any of the information was not known at the time of initial reporting of the Pollution Incident to any of the Authorities, that information should be notified to the Authorities immediately after it becomes known.

All communications with any of the Authorities following the incident are to be made through the General Manager or one of the other people specified in Section 4.4. Following the initial notification of the incident, these personnel will ensure that regular contact is made with all Authorities, and persons who have been notified of the incident, in relation to ongoing actions taken to combat the pollution caused by the incident.

In particular these personnel will:

- Liaise with the EPA regarding appropriate actions to be taken to control, manage and mitigate the pollution;
- Work co-operatively with the EPA and any other relevant authorities to clean-up any pollution;
- Notify the community of the results of ongoing monitoring of the pollution; and
- Consult any owners or occupiers in the vicinity of the site regarding any off-site actions to be taken which may impact on their properties.

5.1.5 Notification of pollution incident to community /local landholders

The site is located within the overall catchment of Ourimbah Creek, a tributary of Tuggerah Lake. The site is located approximately 30 m from a minor tributary of Ourimbah Creek which flows on a north easterly direction.

Any Pollution Incident causing or threatening material harm to the environment in these areas will be communicated to all people likely to be adversely affected by the incident.

Communication with these people will be made as soon as practicable following a Pollution Incident as well as on an ongoing basis until the incident has been fully controlled and any harm caused as a result of the incident has been rectified.

EBH will contact people affected by a Pollution Incident either by telephone, letterbox drop or 'doorknocking'. Notifications will also be made, if deemed necessary, on the EBH website. The method and content of any communication will depend on the Pollution Incident and the actions required to protect human health. For example, advice may be given to avoid the use of water in creeks affected by the discharge of a pollutant to a waterway.

6. Reporting, review and training

6.1 Training

All new staff, contractors and visitors to the premise will undergo a site induction. Training programs will ensure all personnel are aware of this PIRMP and the response procedure to a pollution incident.

For staff and contractors who are in contact/work with dangerous goods and/or hazardous materials at the premise, specific safety and environmental training will be provided.

Targeted training exercises will also be undertaken for those employees in regard to the safe and correct use of all spill clean-up equipment or pollution prevention structures on site and the safe handling and legal disposal of contaminated materials and wastes resulting from an incident.

A training exercise designed to test the adequacy of emergency preparedness and response will be undertaken at least once each year.

Refresher training on this PIRMP will also be provided to all staff and contractors if there are any amendments, in addition to periodic refresher training on an annual basis.

6.2 Testing, review and update

Testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Testing shall be undertaken in the following ways:

1. The PIRMP will be tested by assessing and reviewing it and making any necessary changes. Testing is taken to be either a desktop review or an environmental emergency drill. Testing will include all components of the plan, including training requirements;
2. A review of the PIRMP will occur every 12 months. Contact details in this document must be kept current at all times; and
3. The PIRMP will be reviewed within one month of the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to determine if the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Records of testing must be provided in the review table presented at the start of this plan.

Information to be retained regarding PIRMP testing includes:

- The manner in which the test was undertaken;
- Dates when the plan has been tested;
- The person who carried out the testing; and
- The date and description of any update of or amendment to the plan.

6.3 Plan availability

EBH will make this PIRMP publicly available on their website. On completion of the annual testing and review process (Section 6.2), or following a test in response to an incident, EBH Environmental will review and if necessary amend the PIRMP and make the reviewed or amended version available on the EBH Environmental website.

A hard copy of the PIRMP will also be available at the site office and will be provided to all personnel responsible for implementing the PIRMP. The PIRMP will be made available to an EPA Authorised Officer on request.

7. Roles and responsibilities

Role	Responsibility
Managing Director / Shift Supervisor	<ul style="list-style-type: none"> • Provide adequate resources for the implementation of this PIRMP.
	<ul style="list-style-type: none"> • IMMEDIATELY implement this PIRMP when notified that a Pollution Incident has occurred onsite, including notifications as per Section 5.1.
	<ul style="list-style-type: none"> • Provide written Pollution Incident report to EPA within 7 days on an incident occurring
	<ul style="list-style-type: none"> • Ensure this PIRMP is kept up to date • Ensure contact details in this PIRMP are up to date at all times • Ensure current version of this PIRMP is displayed on the website and a hard copy is kept at the office (in a prominent, readily accessible location)
	<ul style="list-style-type: none"> • Ensure that all employees and contractors are given adequate training in identifying and responding to Pollution Incidents and ensure they are aware of the penalties for failing to comply • Undertake weekly inspections to assess storage facilities and safety and pollution control equipment
	<ul style="list-style-type: none"> • Annually test this PIRMP • Review and update this PIRMP following each test and record reviews
All personnel and contractors	<ul style="list-style-type: none"> • IMMEDIATELY report all Pollution Incidents to the person responsible for the site i.e. the shift supervisor
	<ul style="list-style-type: none"> • Ensure all chemicals, hydrocarbons and hazardous substances are stored and handled appropriately
	<ul style="list-style-type: none"> • Report any potential hazards to supervisor
	<ul style="list-style-type: none"> • Evacuate area and/or assist in clean-up operations

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