Pollution Incident Response Management Plan

Kurrajong Recycling

54 Chaston Street Wagga Wagga

EPA number 20661

Our Vision: To create open, accessible and inclusive communities for all people.

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Review History

25 September 2015	PIRMP developed for site
25 September 2016	PIRMP revised
18 August 2018	Revision of procedures
3 April 2019	Review of PIRMP
31 January 2020	Review of PIRMP, change of staff and Vision

1. ACTION PLAN

Actions to be taken during or immediately after a pollution incident.

If it is suspected that an incident may cause material environmental harm the Pollution Incident Response Management Plan will be activated. The plan is activated by contacting one of the six key people listed in the plan. This plan is based on six phases:

Phase 1. Assess

Phase 2. Stop and Contain

Phase 3. Notify

Phase 4. Communicate

Phase 5. Clean Up

Phase 6. Review

- **Identify the severity, risks, and extent of the incident:**

- **What is the substance emitted?**
- **What are its properties?**
- **What is the volume of the emission?**
- **Is there a risk to health and safety of people on site, people off site or the environment?**
- **Do you have the necessary PPE to manage the emission?**
- **Are there any contributing factors that increase risk? eg. weather, increased population on or near site.**

phase 2

STOP and CONTAIN

- **Stop the source of the emission.**
- **Ensure that necessary emergency materials are on hand to control and contain larger emissions:**

eg.
shut down plant and equipment;
restore drums to upright position;
employ spill kit;
sandbag storm water outlets
secure loads;
close shed doors.

phase 3

NOTIFY

- **Contact key people:**

People responsible for activating and managing this plan:

Craig Salan - Manager
Ron Butler - Site Supervisor
Angela Carlo - Admin
Doug Brambley - Senior Supervisor CDS & E-Recycling
Steve Davis - Senior Supervisor MRF & S/D Shredding

People authorised to notify and coordinate relevant authorities:

Craig Salan - Manager
Ray Carroll - CEO

- **Contact Relevant Authorities (promptly; in this order and if required):**

If there is immediate threat to humans or property	**000**
Wagga Wagga City Council	**02 6926 9100;**
EPA	**131 555**
Ministry of Health via the Public Health Unit Albury Office (After Hours ask for On Call Public Health Officer)	**02 0808100 A/H 02 6080890;**
WorkCover Authority	**13 10 50**
Fire and Rescue NSW	**000**

phase 4

COMMUNICATE

- **Notify people that may be affected by the incident and inform them of the actions they can take to minimise impact.**

  - On site: sound Evacuation Siren to activate Emergency Evacuation Procedure.
  - Immediate neighbours: phone neighbouring businesses and doorknock neighbouring residents to inform of the risk and actions they should take eg. shut windows and doors, stay inside. Inform passing pedestrians and motorists if reasonably possible.
  - Contact hospitals, nursing homes, schools and child care centres if needed.
  - Supply chain – if operations are impacted:

SUEZ
Cleanaway
JR Richards
Velolia
Smallmon Brothers Waste

phase 5

CLEAN UP

- **Clean up and take remedial action to restore the environment using SOPs.**

eg.
pick up litter;
sweeping (manually and forklift broom);
activate coolfog system;
employ waste contractor to pump out stormwater basin

- **Follow advice from authorities regarding specific clean up requirements.**

- **Disposal of pollutants in accordance with regulations.**

- **Conduct an internal investigation, recording on form EMS 11.1 Incidence and Non-conformance Report. This report will be included on the next Management Review to be sent to the Board of Directors.**

- **Assist external investigation by EPA, Wagga Wagga City Council or any other investigators.**

- **Upon conclusion of review, communicate findings to people impacted by the incident:**

On site – through meetings
Off site – by letter

- **Test the effectiveness of this Pollution Incident Response Management Plan:**
  - **at the first Emergency Evacuation Drill of each year (recorded in the red book);**
  - **checked annually as part of the EMS internal review;**
  - **one month after any incident to ensure controls are in place.**

- **Review the need of further training of staff.**

2. Purpose and Objectives

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the Protection of the Environment Operations Act 1997 (POEA Act) and associated Protection of the Environment Legislation Amendment Act 2011 (POELA Act) for licensed facilities.

This document is to be used in conjunction with other Kurrajong Waratah systems including the Environment Management System (ISO 14001:2004), Emergency Evacuation, Internal Audit and Crisis Management.

The objectives of this plan are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities and community members who may be affected by the impacts of the pollution incident;
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risk and the development of planned actions to minimise and manage those risks; and
- Ensure that the plan is properly implemented by trained staff, identifying people responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

3. Scope

This PIRMP covers the Kurrajong Recycling site located at 54 Chaston St, Wagga Wagga.

4. Definition

Pollution incident means 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.

5. Overview of Operations

Kurrajong Recycling is operated by Kurrajong Waratah, a not for profit organisation providing services for people with a disability. It is managed by a Board of Directors with an executive team of Managers.

The finances of Kurrajong Waratah and Kurrajong Recycling are professionally managed to ensure that the cost of a pollution incident is covered by the appropriate level of insurance and contingency funds.

The operation of Kurrajong Recycling is managed by a Manager and a team of Senior Supervisors.

6. Key Personnel

Any person on site has the responsibility of reporting a pollution incident to one of the following six key personnel who can then activate the Pollution Incident Response Plan:

Craig Salan - Manager
Ron Butler - Site Supervisor
Angela Carlo - Office Admin
Doug Brambley - Senior Supervisor CDS & E-Recycling
Steve Davis - Senior Supervisor MRF & S/D Shredding

7. Description and Likelihood of Hazards

The potential hazards of Kurrajong Recycling' Chaston Street Wagga Wagga site are:

Hazard	**Risk**	**Contributing Factors**
Dust generation	Low	Breakdown of dust suppression system
Uncontrolled release of litter	Moderate	Failure to follow procedures
Stormwater overflow	Low	Extremely high rainfall

8. Pre-emptive Actions Taken

Dust	Coolfog dust suppression system Hard standing surfaces (concrete)
Litter	Maintenance program – clean up daily x 3 Forklift broom SOPs for securing loads etc.
Stormwater overflow	Retention basin to trap stormwater on site Maintenance program to clean stormwater pit monthly Control barriers to prevent litter entering stormwater system Strainers fitted to drains, maintained regularly

9. Inventory of Pollutants

Pollutant	Maximum quantity
Fuel	4000 litres
Oil	1000 litres
Lpg gas	200 kilograms
Waste water	2000 litres

10. Safety Equipment and Systems

Equipment	Comments
SDS Register x 2	Located in the workshop and the office.
Spill Kits	Located in the store, workshop and e-Recycling.
Fire equipment	Marked on map. Fire Certificate updated annually. Equipment checked twice yearly.
Emergency Evacuation Drills	Conducted quarterly.
Personal Protection Equipment	Gloves, boots, glasses, dusk masks, hearing protection and hi-vis clothing. Issued to every person on site.
Bunds	Fuel and oil is bunded. Locations marked on map.
WHS Site Inspections	Conducted monthly by a trained WHS Rep.
Maintenance Inspections	Conducted daily by maintenance workers

11. Notification to Relevant Authorities

When a pollution incident has been identified and assessed, the following personnel are responsible for notifying and coordinating with relevant authorities promptly:

Craig Salan - Manager
Ray Carroll - CEO

External authorities to be notified (in order):

If there is immediate threat to humans or property	000
Wagga Wagga City Council	02 6926 9100
EPA	131 555
Ministry of Health via the Public Health Unit Albury Office (After Hours ask for On Call Public Health Officer)	02 0808100 A/H 02 6080890
WorkCover Authority	13 10 50
Fire and Rescue NSW	000

12. Communication with People

If it is determined that staff members and members of the public will be impacted by the pollution incident, the following protocols will occur:

- On site: sound Evacuation Siren to activate Emergency Evacuation Procedure.
- Immediate neighbours: phone neighbouring businesses and doorknock neighbouring residents to inform of the risk and actions they should take eg. shut windows and doors, stay inside.
- Inform passing pedestrians and motorists if reasonably possible.
- Contact hospitals, nursing homes, schools and child care centres if needed.
- Supply chain – if operations are impacted:

SUEZ
Cleanaway
JR Richards
Velolia
Smallmon Brothers Waste

13. Review of Incident and Response

Once the pollution incident is remediated and operations are resumed, a review of the incident and the response to it will be conducted.

- Conduct an internal investigation, recording on form EMS 11.1 Incidence and Non-conformance Report. This report will be included on the next Management Review to be sent to the Board of Directors.

- Assist external investigation by EPA, Wagga Wagga City Council or any other investigators.

- Upon conclusion of review, communicate findings to people impacted by the incident:

  On site – through meetings
  Off site – by letter

- Test the effectiveness of this Pollution Incident Response Management Plan:
  - at the first Emergency Evacuation Drill of each year (recorded in the red book);
  - checked annually as part of the EMS internal review;
  - one month after any incident to ensure controls are in place.

- Review the need of further training of staff.

14. Staff Training

- All staff undertake a training package, developed by Kurrajong Waratah, about the Kurrajong Waratah Environment Management System at induction and annually thereafter. Staff will be made aware of this Pollution Incident Response Management Plan (PIRMP) at the same time.
- Key personnel will undertake training about this PIRMP annually.
- Key personnel undertake chemical handling and spill response.
- All staff undertake safety training annually.
- Emergency Evacuation Drills are conducted quarterly.
- EMS and WHS issues are standard agenda items in every staff meeting.
- All visitors to the site must read and sign off on Form 13.2 Site Safety Plan annually.
- All staff training is recorded in a Training Register that is checked annually in the EMS internal audit system.

15. Availability of this Document

In accordance with Section 153D of the POEO Act, this full Pollution Incident Response Management Plan will be made available to all site personnel by displaying it on noticeboards in each section of the site.

In addition, the public will be able to view the public version of this plan on the Kurrajong Waratah website (contact details of key personnel will not be published in the public version). We will also provide the public version of the plan, without charge, to any person who requests it.

Kurrajong Waratah will ensure that a copy of the full plan will be onsite at all times, available to the EPA or other regulatory bodies if required.

16. Testing of the Plan

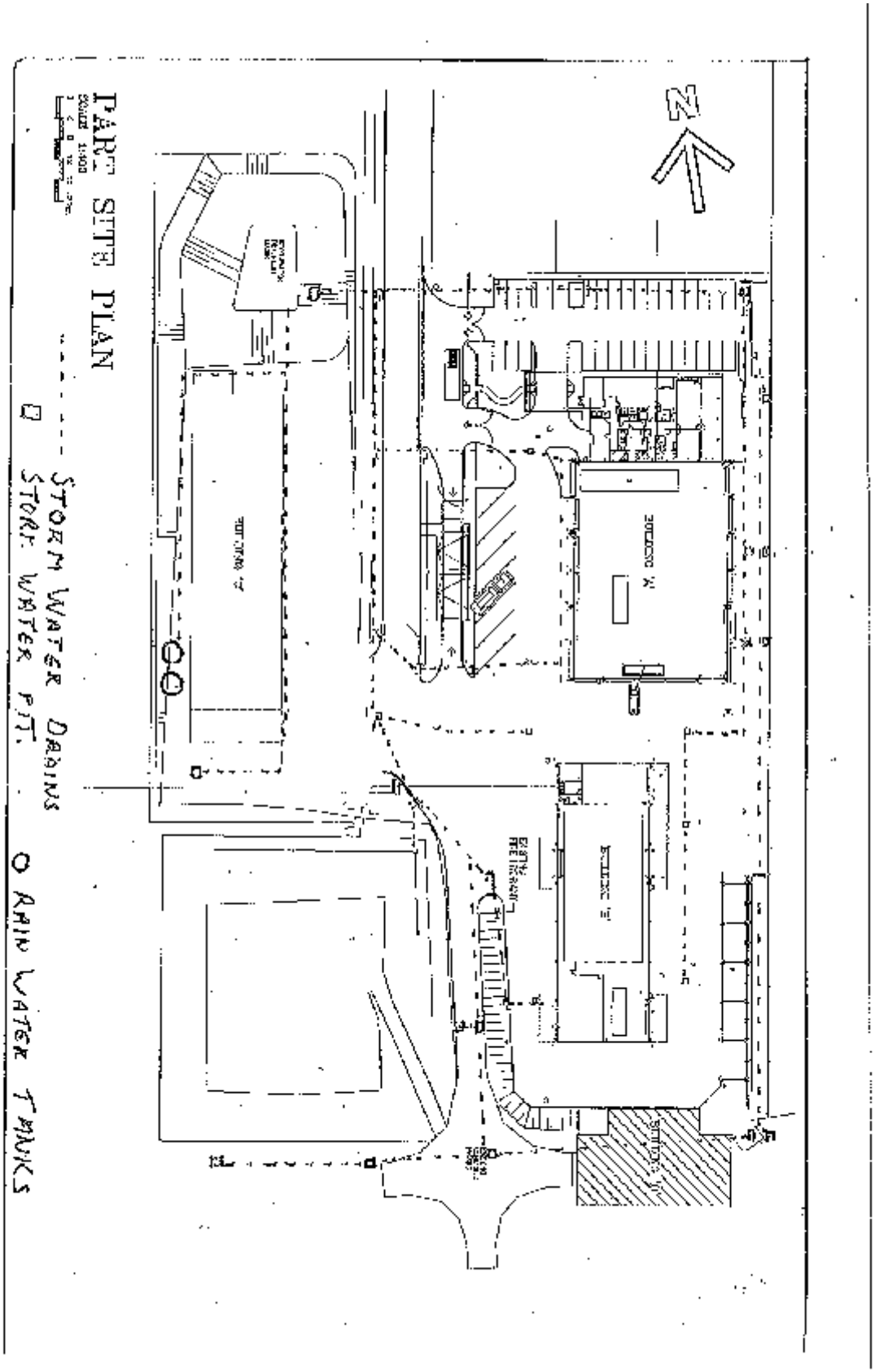
This plan will be tested annually at the first quarterly Emergency Evacuation Drill of each year. The test will include a desktop simulation as well as the practical exercise.

This will ensure that the information contained in the plan is accurate and up to date, and the plan is capable of being implemented in a workable and effective manner.

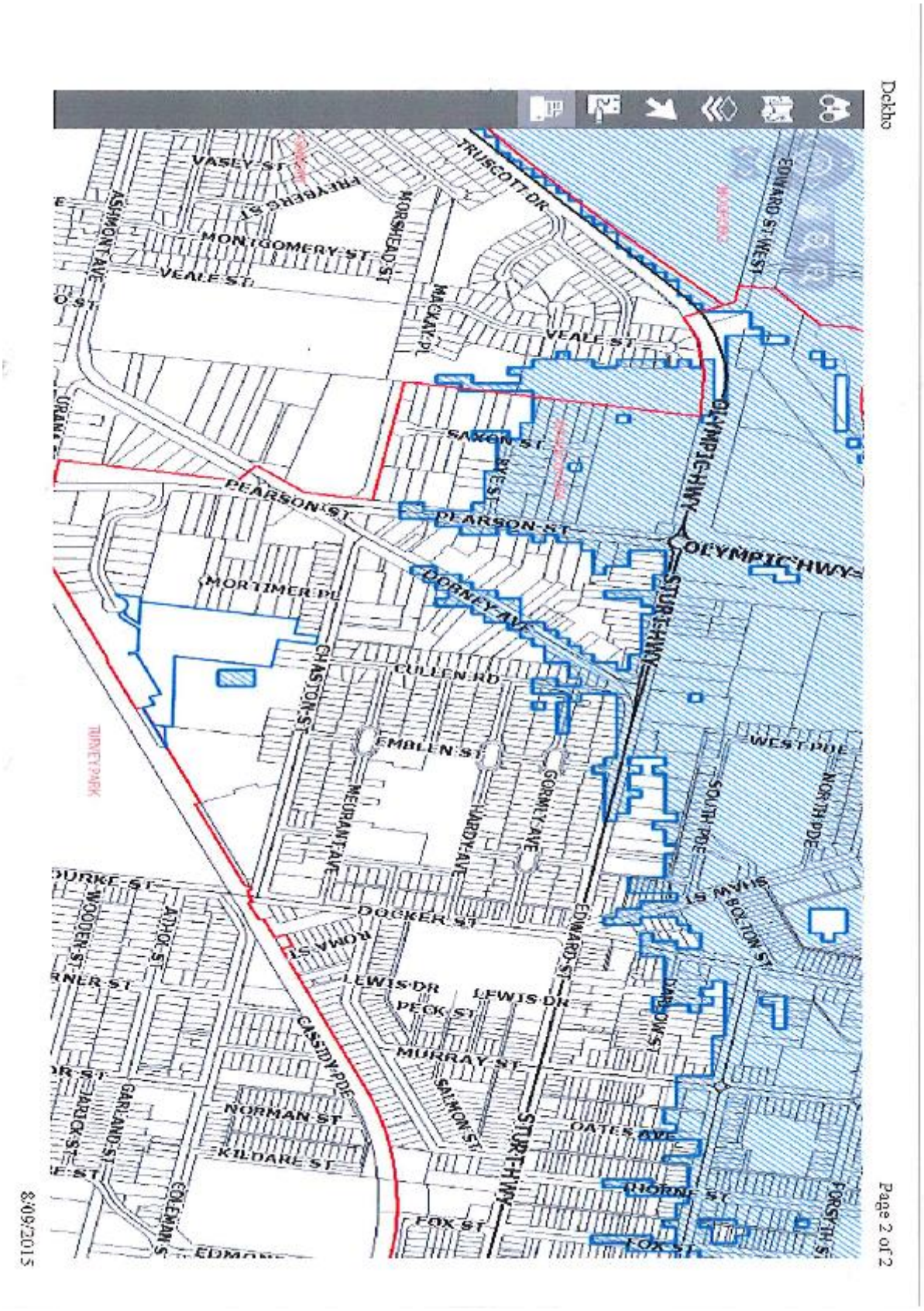
The plan will also be tested:

- 1 month after any pollution incident occurs;
- If there are significant changes to the hazards and risks on the site;
- If the plan is to be adapted to include other sites.

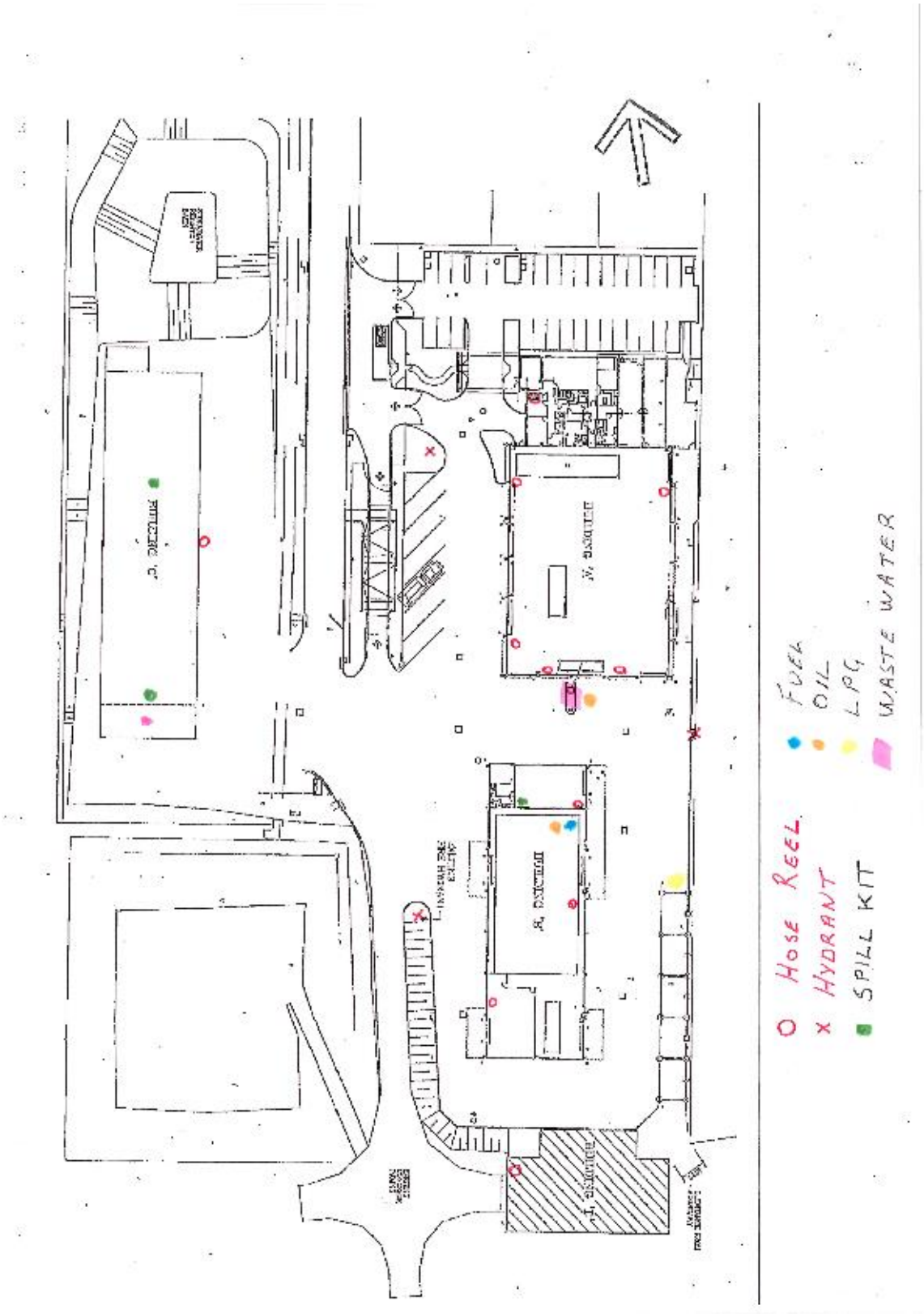
17. Site Map of Storm Water Drains



18. Map of Flood Zone surrounding 54 Chaston Street Wagga



19. Site Map of Pollutant and Safety Equipment Locations



Attachment 1
EPA LICENCE #20661

Section 55 Protection of the Environment Operations Act 1997

Environment Protection Licence

Licence - 20661

Licence Details	
Number:	20661
Anniversary Date:	31-August

Licensee
KURRAJONG WARATAH
PO BOX 8576
WAGGA WAGGA NSW 2650

Premises
KURRAJONG RECYCLERS
54 CHASTON ST
WAGGA WAGGA NSW 2650

Scheduled Activity
Resource Recovery

Fee Based Activity	Scale
Recovery of general waste	> 0 T recovered

Region
South West - Albury
2nd Floor, Government Offices, 512 Dean Street ALBURY NSW 2640
Phone: (02) 6022 0600
Fax: (02) 6022 0610
PO BOX 544 ALBURY DC
NSW 2640

Environment Protection Authority - NSW
Licence version date: 31-Aug-2015

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