

## Document Control

Rev No	Pages	Date	Description of Revision	Prepared By	Approved By
0	25	7/2010	Original Document	SL	TJM
1	17	1/2020	Rewritten following environmental compliance audit	NR	TJM
2	18	08/2021	Flow chart added following EPA audit	BW	NR
3	18	02/2023	Updated with new contacts	NR	NR



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## 1. Introduction – Immediate Actions

In the event of a pollution incident at Brandown this PIRMP must be implemented. If material harm to the environment is caused or threatened the following actions must be taken:

1. Immediately take measures to minimise the impact of the incident as far as is reasonably practical to do so with site personnel and equipment, e.g., Remove flammable material from the area surrounding a fire, spill containment, etc.
2. Assess the situation with site management (when in attendance) and if it is deemed that there is an immediate threat to human health or property call emergency services on '000'.
3. Determine if the incident is classified as 'notifiable' – Guidance on how to determine if a pollution incident is notifiable can be found in section 7 of this document.
4. If the incident is determined to be 'notifiable' the following authorities must be notified immediately in the order as listed:

<b>1</b>	EPA Pollution Line		<b>131 555</b>
<b>2</b>	NSW Public Health Unit - Notification of Pollution Incidents	Normal Hours	<b>1300 066 055</b>
		After Hours	<b>8738 3000</b>
<b>3</b>	SafeWork		<b>131 050</b>
<b>4</b>	Liverpool Council		<b>1300 36 2170</b>
<b>5</b>	Emergency Services		<b>000</b>
<b>6</b>	Local businesses and residents: Kemps Creek Bowling Club Cecil Park Shooting Centre Ezy Build Residents	<b>0411 566 621</b>	<b>9826 1375</b> <b>8782 0100</b> <b>9826 1668</b> <b>Door knock</b>

## 2. Environment Protection Licence (EPL) Details

Name of licensee: Brandown Pty Ltd

EPL numbers: 5186 & 12618

Premises address: Lot 90 Elizabeth Drive Kemps Creek (90 Range Rd Cecil Hills)

Business contact details:

Business hours phone: (02) 9826 1256

Primary contact:

Name: Nick Renwick

Position: General Manager

Secondary contact:

Name: Gary Collins

Position: Operations Manager - Recycling

Tertiary contact:

Name: Jay Redden

Position: Site Supervisor

Scheduled activity on EPL 5186: Extractive activities and waste disposal (application to land)

Scheduled activity on EPL 12618: Composting, resource recovery and waste storage

### 3. Pollution Incident – Persons Responsible

PIRMP Activation:

Name of person responsible: Nick Renwick

Position: General Manager

Phone number:

Notifying Relevant Authorities:

Name of person responsible: Nick Renwick

Position: General Manager

Phone number:

Managing Response to Pollution Incident:

Name of person responsible: Gary Collins

Position: Operations Manager - Recycling

Phone number:

### 4. Levels of Emergencies

- **Local alert** or any situation which threatens life, property, or the environment:
- **Site alert** where effects may spread to other areas on the site:
- **External alert** where effects may spread and impact on the people, property or the environment outside the site or cannot be contained by site resources:
- **Outside alert** where an off-site incident impacts the site.

### 5. Emergency Response Procedures

Actions to be taken in the event of an emergency, in order:

1. External notification if required (refer to section 1)
2. Internal notification – site managers, supervisors, leading hands, etc.
3. On site actions as per the directions of Sergio Puente

4. Notify the local community as per the directions of Nick Renwick (door knocking as required)
5. Hand over control of the incident to the appropriate emergency services organisation
6. Make arrangements for relief staff where required

## 6. Notification of the Local Community

In the event of an incident which may impact the local community the Commercial Manager will notify residents and other receptors in the potentially affected area by means of a door knock. Updates will be provided via door knock and or phone call by the Commercial Manager or his representative.

## 7. Duties During and Emergency

### Person Discovering the Incident

- **Rescue** persons in danger
- **Notify** site management
  - Nature of incident (fire, spill, etc)
  - Exact location
- **Follow** instructions given by Sergio Puente or his representative
- **Evacuate** to the appropriate emergency evacuation point if instructed

### Person Responsible for Managing the Response

- **Rescue** persons in danger
- **Contact** emergency services if this has not already been done
- **Stop entry** of vehicles to the site or the area where the incident is taking place
- **Attend** to the incident
- **Evacuate** all personnel if required
- **Assist** emergency services by way of providing personnel, mobile plant, access to water, etc.

### Person Responsible for Notifying the Authorities

- **Inform** the General Manager
- **Notify** the relevant authorities as per section 1
- **Notify** the local community if required and provide updates

## 8. Specific Incident Response Procedures

### Fires:

- Firefighting should only be attempted by site personnel if safe to do so
- Isolate fuel source
- Use fire extinguishers
- Fire hose reels
- Use watercarts
- Use fire hydrants, fire hoses and nozzles in fire boxes (located adjacent to fire hydrants)
- Aim at the base of the fire where the fuel is burning, not the flames
- Capture and contain firefighting runoff for testing/treatment/disposal
- Mobile plant may be required to separate material not yet ignited
- Be aware that when using mobile plant to open burning stockpiles this will allow oxygen to fuel the fire which may exacerbate the incident

### Hot Loads:

- Hot loads detected at the weighbridge should be rejected. A watercart may be offered to assist if available
- Hot loads detected at the tip face after tipping must be segregated from other combustible waste. This may be done with mobile plant if it is deemed safe to do so
- The load must be extinguished using site firefighting equipment and quarantined for a minimum of 1 hour to ensure the fire is completely extinguished. Soil or the like may be used to smother the load if required

### Spills:

- Isolate the source of the spill
- Contain the spill from spreading
- Ensure that customers and other unnecessary personnel are kept clear of the incident area
- Notify relevant authorities if required

### Harm Minimisation:

- Where it is deemed necessary to evacuate personnel the Person Responsible for Managing the Response will initiate the evacuation procedure.
- Localised incidents at either the crusher and/or recycle plant areas require personnel from either or both of these areas to evacuate to the emergency assembly location as signposted.
- Site wide incidents will require a full site evacuation to the emergency assembly location adjacent to the site front gates.
- The Person Responsible for Managing the Response will assign someone or several people to ensure all personnel, including customers, contractors and visitors have been evacuated.
- Brandown keeps a significant stock of PPE such as respiratory protection, protective body suits, gloves, and gum boots, etc. for use in spill clean ups or other incidents.

### Fire Water Containment

- All surface water on site drains to one of several surface water collection ponds
- The capacities of these ponds total approximately 20,000m<sup>3</sup>
- Pumps and water transfer pipes enable water to be transferred from each of these ponds to another pond. This will enable potential fire water to be collected and stored on site pending testing/treatment and or disposal
- The collection pond in the catchment with the highest fire risk (waste storage and processing area) is maintained with several thousand cubic meters of storage capacity at all times. This ensures that all fire water resulting from an incident in this area will be contained.

## 9. Actions to be taken Immediately After a Pollution Incident

- In an emergency involving external emergency services, control should be handed back to the Response Manager when the public emergency service Commander's role is complete.
- The Response Manager will assess the situation and decide on any additional actions to be completed to mitigate further pollution and before declaring the incident closed.
- An incident report must be made detailing the causes, factual details, witness accounts, findings, recommendations and PIRMP updates, etc.

## 10. Description and Likelihood of Hazards

### List of Hazards

ITEM	CAPACITY
Diesel Storage Tanks	Up to 95,000 L capacity
Used Oil Bunded Tank	4,500 L capacity
Bulk & Drum Oil Bunded	3,000 L capacity
Acetylene Cylinders	10 x cylinders
Timber/Wood Waste Processed & Unprocessed	Up to 5,000 Tonnes
Unprocessed Building & Demolition Waste	Up to 225,000 Tonnes
Processed Building & Demolition Waste	Up to 35,000 Tonne
Metal	Up to 500 Tonne
Tyres	Up to 50 Tonne
Leachate Pond	1900Kl
Sedimentation Pond	Capacity of 12,000Kl
Miscellaneous Products- Paints, solvents etc	Various Small Amounts
Landfill Leachate	1,938 cubic meters

## **Likelihood of a Pollution Incident Occurring and Harm**

### **Reduction Control Measures**

DESCRIPTION	LOCATION	LIKELIHOOD	CONTROLS IN PLACE
Fire	Workshop Recycle plant Electrical Site offices Diesel fuel storage tank Stockpiles Mobile plant Landfill areas Chemical fires (fuels, gases and other flammable substances)	Low	Training Daily Inspections Fire Extinguishers Fire Hydrants Fire Suppression System at Wood Storage Area Back to Base Alarm Monitoring After Hours Surveillance
Explosions – Nitrogen, Oxygen, and Acetylene Cylinders and:  Unexploded ordnance (UXO).	Fuel Storage Tanks Workshop Landfill Area	Low	Trained and Qualified workers Visual Inspections Storage in accordance with Australian Standards
Liquid & Chemical Spills	Around fuel tanks, On roadways, Hardstand areas, Workshop, Equipment Failure	Low	Designated maintenance areas Regular Maintenance Daily Inspections Spill Kits Implement immediate clean-up of oil spills on site
Gas Emissions	Damaged/leaking gas cylinders Workshop storage area	Low	Store on racking inside of shed



**BRANDOWN  
POLLUTION INCIDENT RESPONSE  
MANAGEMENT PLAN**  
Integrated Management System

Doc No. PIRMP02  
Version No: 3

Accidents	Vehicle & Plant Operations	Low	Effective implementation of traffic management plan - control of vehicle speeds Trained and competent personnel
Ecological Impacts	Site	Low	Minimisation of food sources or suitable habitats, Use of professional exterminators if an outbreak is detected
Air Quality - Dust	Site	Low	Regular use of water cart to dampen active work areas Monitor/maintain operational height of stockpiles and cells Effective use of a dust suppression systems in the Recycling & Crusher area Effecting dust capture in plant operations Effective implementation of traffic management plan - control of vehicle speeds. Restrict vehicle movements to specified routes on unsealed roads Maintain revegetated batters to facilitate dust capture Testing conducted monthly
Surface water/ Leachate Spill	Site	Low	Capture runoff water on site and use for dust suppression.

			<p>Direct all on-site runoff to Brandown's retention dams.</p> <p>Workers to monitor the level of the retention dams and notify Site Management in the event that management intervention is required.</p> <p>Regular maintenance of surface water management infrastructure.</p> <p>Testing conducted as per EPA licence 5186</p>
Noise Impact	Site	Low	<p>Restrict operating plant to hours allowed under EPA license</p> <p>Restrict vehicle movements into and out of the premises to the permitted hours only.</p> <p>Ensure machinery and plant are properly maintained in such a manner as to avoid excessive noise generation.</p> <p>Noise attenuation considered when purchasing any new plant and equipment.</p> <p>Testing conducted as per EPA licence 5186</p>
Asbestos	Landfill and/or recycling areas	Low	<p>Asbestos Awareness training.</p> <p>Segregation of product.</p> <p>Recording of quantity delivered to site.</p> <p>As per Guidelines for management of Asbestos in recycled waste materials.</p>

			Compliance with regulatory guidelines. Compliant waste covering practices at landfill.
Civil Disturbances– Sabotage Vandalism Theft Arson	Site	Low	24 Hour Back to base Security Video Surveillance

## 11. Conditions Leading to Increased Likelihood of Incident

Site personnel must be aware that certain environmental or operational conditions may increase the likelihood of an incident occurring. When the following conditions arise, extra precautions may be necessary.

### Fires:

- Hot, dry, windy conditions with low humidity
- Stockpiles of organic material stored for lengthy periods of time may break down and spontaneously combust
- Hot works on site

### Leachate Spills:

- Periods of prolonged wet weather
- Earth works or subsidence around buried leachate transfer pipes
- Work in the vicinity of above ground leachate infrastructure

### Dust emissions:

- Hot, dry, windy conditions with low humidity
- Disturbance of fine, dry material
- High levels of traffic on unsealed roads with no dust suppression

## 12. Safety Equipment

In the event of a pollution incident the following materials and equipment is available on site to minimize the impacts of the incident:

- Earthmoving equipment to contain spills, assist with firefighting etc. including front end loaders, excavators, bulldozers, dump trucks, water carts, etc.

- Bunding material to contain spills – shale and clay.
- Absorbent material to assist with spill clean-up – fine wood chip and sands/soils.
- Site fire hydrant system plumbed to high-risk areas on site including processing and waste storage areas.
- Automated fire deluge and sprinkler system with 24 hours back to base monitoring at wood recycle plant wood processing and storage area.
- Surveillance cameras throughout the site to detect the early signs of a potential incident.
- Firefighting hose reels and extinguishers located throughout the site.
- Runoff catchment dams to collect any pollutant before it leaves the premises.

### **13. Staff Training and Testing and Maintenance of the PIRMP**

- The plan must be tested and documented routinely at least once every 12 months  
Appendix A contains records of previous PIRMP test events.
- There are two methods of testing the plan and they are:
  - Desktop simulation
  - Practical exercise or drills
- Testing must cover all components of the plan, including the effectiveness of training
- Training all workers to know exactly what is expected of them in an emergency situation, training will be provided
- Selected workers will receive first aid training and will hold a current first aid certificate
- Selected workers will be trained in Fire Fighting
- The PIRMP is to be updated following:
  - Any major change to site operations,
  - Any notifiable incident,
  - Any routine test highlights a plan deficiency

## 14. Definitions

### **Pollution Incident**

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. 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.

### **Notifiable Pollution Incident**

Pollution incidents causing or threatening material harm to the environment must be notified.

### **Material Harm to the Environment**

Definition taken from the POEO Act – Sect 147

#### ***147 Meaning of material harm to the environment***

*(1) For the purposes of this Part:*

*(a) harm to the environment is material if:*

*(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*

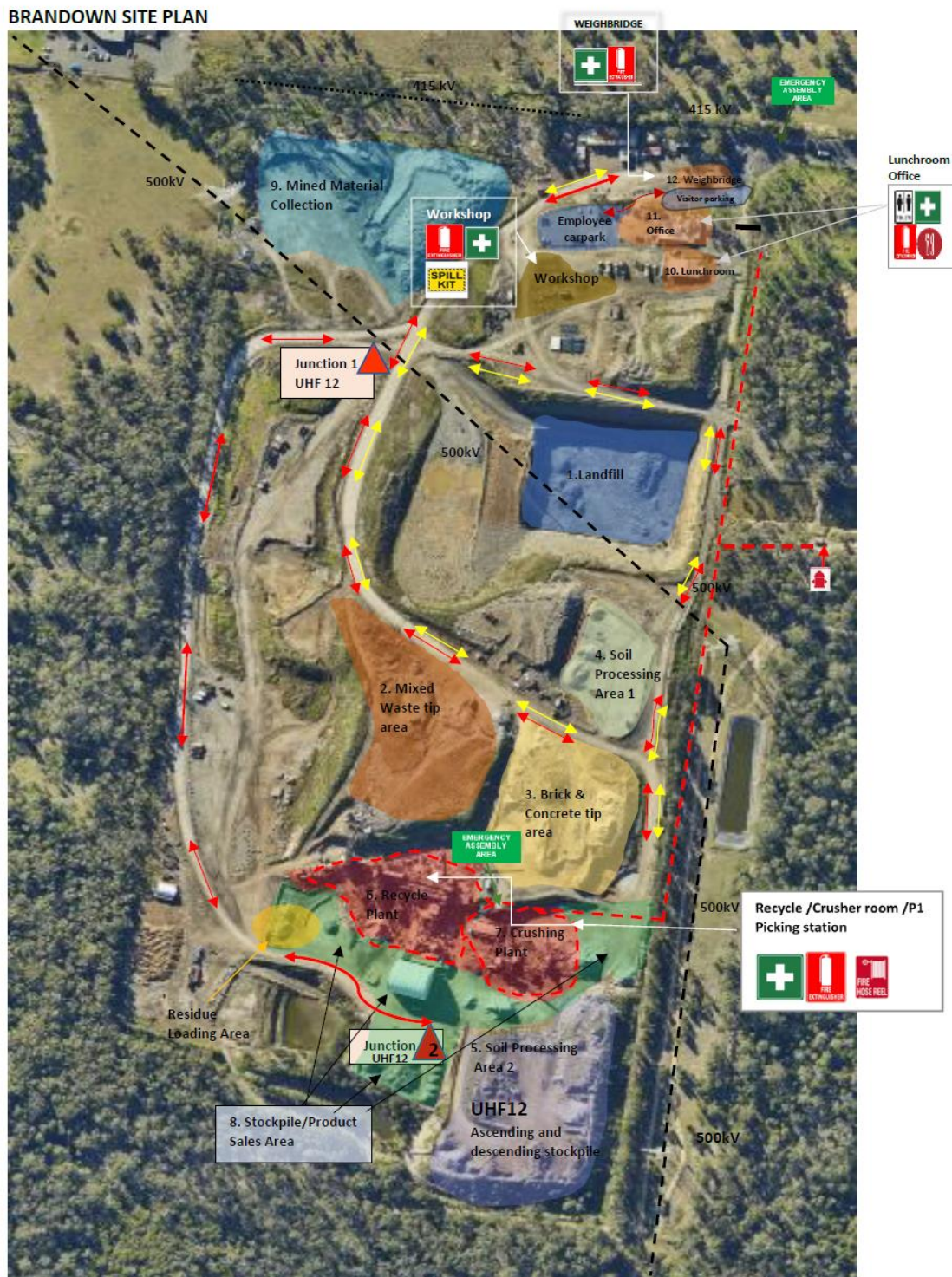
*(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

*(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.*

## 15. Site Plans



**BRANDOWN SITE PLAN**







**Plan – Licensed Premises**

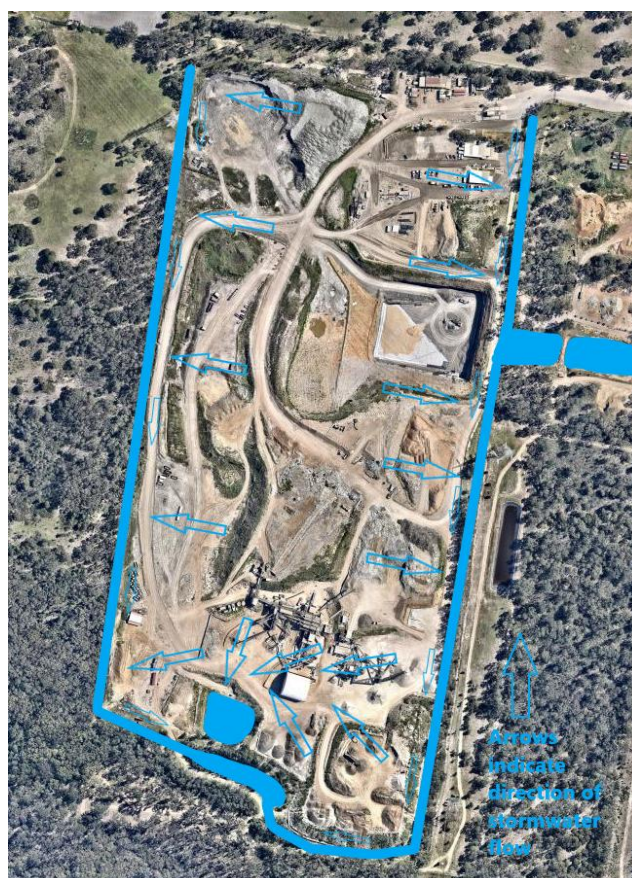


**Plan – Nearest residents, businesses, and receptors**





**Plan – Site Major Hazards**



**Plan – Site Stormwater Drain Network**



## 16. Appendix A – PIRMP Test Records

### **PIRMP Drill**

Conducted by Ben Whitehouse

16/12/21

**Incident – Hot Load/Fire at the S-section**

### **In Attendance**

**Ben Whitehouse (BW) – SHEQ Coordinator (Safety Committee Member)**

**Sergio Puente (SP) – Operations Manager (Safety Committee Member)**

**Eray Ozturk (EO) – Site Labourer**

**Ian Pattison (IP) – Recycling Plant/Operator (Safety Committee Member)**

**John Pattison (JP) – Recycling Plant/Operator**

**Patrick Lubasinski (PL) – Fitter (Safety Committee Member)**

**John Youdan (JY) – Operator (Safety Committee Member)**

Scenario – It is a dry, windy, and humid day. A truck has entered the S-section carrying a hot load. The material has caught fire after being tipped off. In the vicinity is a loader operator (Soils processing area leading hand), a spotter, and the truck driver. The fire spread rapidly and has embers have travelled on the wind to the grassy area next to the leachate pond.

### **Steps to be taken:**

1. Spotter grabs fire-fighting equipment from fire box at s-area, attempts to minimise impact of fire.
2. At the same time leading hand in loader contacts site management.
3. Loader attempts to remove flammable material from near the fire.
4. Management activates PIRMP.
5. Management calls “000”.
6. Management instructs staff to continue fighting fire if safe to do so.
7. Management determines that fire is notifiable incident.
8. Management instructs staff to evacuate area to nearest, logical emergency assembly point.
9. Management notifies relevant authorities in appropriate order.
10. Staff instruct customer to evacuate to nearest, logical emergency assembly point.
11. Head count by leading hand takes place at emergency assembly point.
12. Staff travel to site emergency assembly point.
13. Fire is handed over to relevant authorities.
14. All staff to follow authorities’ instructions.

### **Findings**

Following PIRMP drill the following issues were raised:

- The spotters’ huts need fire extinguishers – spotters are usually the first responder to a fire incident and currently rely on extinguishers from mobile plant, which may not be close to the incident.
- Loader operators to be toolboxed to ensure they know the correct way of dealing with a hot load – a load of soil should be dumped immediately on the hot load.

- Fire extinguishers at the B-, C-, S-sections need to be capable of extinguishing a lithium battery fire – These extinguishers can be located in the recycling plant but not elsewhere on site.
- Training is required on site firefighting equipment – This should include actively using and suppressing a fire on site.
- Hydrant at the S-area needs to be tested to ensure it is operating as required.
- Fire box to be checked to ensure it has adequate firefighting equipment available.
- Emergency alert system needs to be prepared and staff need to be trained on its activation and use.
- Site evacuation drill needs to be undertaken in order to ensure readiness for an actual emergency.



Figure 1 - PIRMP test



*Figure 2 - Incident Location*



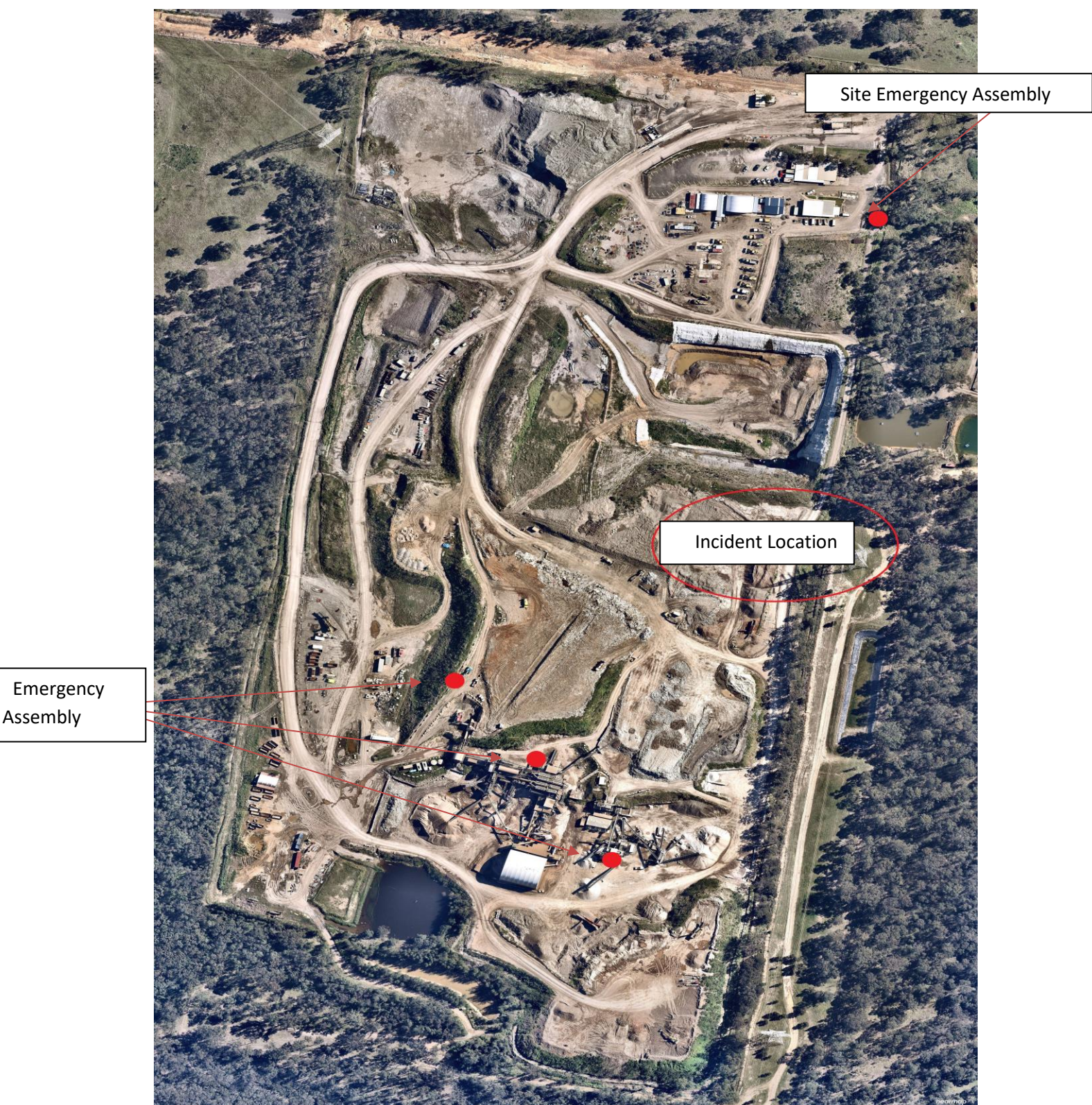


Figure 3 - Incident Location & Site Emergency Assembly Points



Attendance List

Name:	Position:	Signature:	Date:
Ben Whitehouse	SAEO Coordinator		16/12/21
Sergio Puente	Operations Manager		16/12/21
Eray OZTURK	Site Labourer		16/12/21
Ian Pattison	Operator		16/12/21
John Pattison	operator		16/12/21
P. LUBASINSKI	Friller		16/12/21
J. Kuden	operator		16/12/21

## 17. Appendix B – Incident Flow Chart

