Tank Management Australia Pty Ltd

Pollution Incident Response Management Plan

89 Redfern Street, Wetherill Park, NSW 2164

2024-2025

4Pillars
ENVIRONMENTAL CONSULTING

Report Reference: 20240614BIC-A_PIRMP_V1.1

Version: V1.1

Published: 25 February 2025

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Revision History

Revision	Date Reviewed	Details/comments	Review team	Authorisation
1.0	27 September 2024	DRAFT for client comment	4Pillars	Tank Management Australia Pty Ltd
1.1	27 September 2024	REVISED DRAFT for client comment	4Pillars	Tank Management Australia Pty Ltd
1.1	27 September 2024	REVISED DRAFT for client comment	4Pillars	Tank Management Australia Pty Ltd
1.0	30 September 2024	INITIAL PIRMP FINAL	4Pillars	Tank Management Australia Pty Ltd
1.1	25 February 2025	REVISED PIRMP FINAL	4Pillars	Tank Management Australia Pty Ltd

PIRMP Test Record

Plan Version	Test Date	Test Type	Persons Involved	Test feedback and outcome

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Abbreviations

EPA – Environment Protection Authority

EPL – Environment Protection Licence

PIRMP – Pollution Incident Response Management Plan

Glossary of Terms

Dangerous Goods – means substances and articles that have explosive, flammable, toxic, infectious or corrosive properties and pose a risk to public safety, property or the environment.

Hazardous Materials – means anything that, when produced, stored, moved, used or otherwise dealt with without adequate safeguards to prevent it from escaping, may cause injury or death or damage to property. Note: Hazardous materials include hazardous chemicals under the Globally Harmonised System (GHS) and dangerous goods under Australian Dangerous Goods Code.

Hazardous Materials Register – A comprehensive listing of the dangerous goods and hazardous substances on Site.

Hazardous Substance – any substance in the workplace, which appears on the List of Designated Hazardous Substances (NOHSSC: 10005) or as may be classified under the Approved Criteria for Classifying Hazardous Substances (NOHSC: 10008).

Material Harm – as defined in section 147 of the POEO Act: harm to the environment is material if it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or if 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.

Pollution Incident – As defined in the POEO Act Dictionary: 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.

Risk - Measures of likelihood of harm arising from exposure to hazardous substances.

Reference Materials and Supporting Documentation

The Tank Management Australia PIRMP works with and is complementary to:

- The *Protection of the Environment Operations Act 1997* (POEO Act).
- The *Protection of the Environment Legislation Amendment Act 2011* (POELA Act).
- The *Protection of the Environment Operations (General) Regulation 2022* (General Regulation).
- NSW EPA Environment Guideline: *Pollution Incident Response Management Plans 2022* (the Guidelines).
- The Tank Management Australia Pollution Incident Response Procedure (the Procedure).

1. Introduction

Tank Management Australia Pty Ltd (the Licensee) operates a container reconditioning and waste processing facility located at 89 Redfern Street, Wetherhill Park, NSW 2164, under Environment Protection Licence (EPL) No. 11877. As such, the Licensee is required to prepare and maintain a Pollution Incident Response Management Plan (PIRMP), in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act). This requirement was added in 2011, via the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). In addition to preparing the PIRMP, the licence holder must keep a copy of the plan at the premises (Section 153D) and 'test' the plan in accordance with the *Protection of the Environment Operations (General) Regulation 2009* (POEO Regulation).

The PIRMP consists of two parts:

1. The Pollution Incident Response Management Plan (**the Plan**).
2. The Pollution Incident Response Procedure (**the Procedure**).

The Plan has been developed to meet the requirements of the POELA Act (2011) and the POEO Act (1997).

The Procedure provides detail on the process to be followed in the event of a pollution incident. The intended audience for this part is the people directly involved in the day-to-day operations of the Site, including the Managing Director, Site Supervisor, Site staff and (where relevant) contractors. All staff, at a minimum, must read and understand the Procedure in Appendix 3.

These documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the facility. In preparing and reviewing the Plan, it is important to reiterate the definition, objectives, and purpose of the Plan, as detailed in the NSW EPA Environment Guideline: *Pollution Incident Response Management Plans 2022* (the Guidelines). This serves to reinforce to all personnel the importance and role of the PIRMP.

1.1 Definition

As per the definition in the POEO Act dictionary, a 'pollution incident' is:

"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."

As per Section 148 of the POEO Act, notification of a pollution incident must occur if "material harm to the environment is caused or threatened". 'Material harm' is defined in Section 147 of the POEO Act as:

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."

Therefore, **not all pollution incidents are notifiable**. This is made clear in the flow chart at the beginning of the Procedure in Appendix 3.

1.2 Purpose of PIRMP

The purposes of a PIRMP are to:

- Prevent pollution incidents from occurring by facilitating training, plant and equipment maintenance, effective Site supervision and good housekeeping. The PIRMP places emphasis on the prevention of incidents by making it clear that it is the responsibility of all employees, subcontractors, and visitors to the Site to remain vigilant when on-Site.

- Improve the management of pollution incidents and facilitate better coordination with the relevant response agencies. The PIRMP is to provide reference for the procedures and responsibilities for pollution incident response, and this extends to the ongoing management for the prevention and mitigation of any such incident.

The PIRMP (the Plan) works with and is complementary to:

- The Pollution Incident Response Procedure (the Procedure).
- The Site Safety and Environmental Rules and Site Induction.
- Other Site Environment and Workplace Health and Safety Management Plans.

Together, these documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the Site.

1.3 Objectives

As set out in the Guidelines (2022), this PIRMP has been written to:

- Ensure the comprehensive and near immediate communication of a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (Fairfield City Council, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and stakeholders within the community 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 risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

1.4 Scope of the PIRMP

The PIRMP provides detail regarding the legislative framework, Site features, hazard identification, risk assessment, monitoring, testing, reporting and ongoing improvement.

The intended audience for this PIRMP includes the Managing Director, Site Supervisor, Tank Management Australia (TMA) management and advisors and regulatory authorities. TMA is also obligated to provide a copy of the PIRMP to any person who makes a written request for a copy, however, this is not considered the intended audience.

1.5 Availability of the PIRMP

A copy of the PIRMP will be maintained in its written form at the licensed premises and on the TMA website so that it is readily available to the personnel responsible for its implementation and to any authorised EPA officer on request.

The following information is to be made available to the public:

- The procedures for contacting the relevant authorities, including the EPA, Fairfield City Council, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW.
- The procedures for communicating with the community.

This information may be exclusive of any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998.*

2. Site Details

Tank Management Australia (TMA) is a specialised Intermediate Bulk Container (IBC) services and container supplier, located at 89 Redfern Street, Wetherill Park, NSW 2164 (Lot 9 DP709052) as shown in Figure 1. The Site is situated within E4: General Industrial land zoning under the *Fairfield Local Environmental Plan 2013* (Fairfield LEP 2013).

IBCs are plastic intermediate bulk containers designed to store 1000 L of hazardous or non-hazardous liquids or solvents. They are also called IBC tanks, plastic IBCs or IBC plastic water tanks, commonly used by remote operators, such as mining companies, farming communities or refuelling suppliers to effectively store and transport bulk liquid.

The Site details are summarised in Table 1.

Table 1: Site Details

<table>
<tr><th>Item</th><th>Details</th></tr>
<tr><td>Street Address</td><td>89 Redfern Street, Wetherill Park, NSW 2164</td></tr>
<tr><td>Lot/Section/DP</td><td>9/-/DP709052</td></tr>
<tr><td>Lot Size</td><td>1677 m^2 (approximately)</td></tr>
<tr><td>Land Zoning</td><td>E4: General Industrial under Fairfield LEP 2013</td></tr>
<tr><td>Local Government Area</td><td>Fairfield City Council</td></tr>
<tr><td>Environment Protection Licence (EPL)</td><td>11877</td></tr>
<tr><td>EPA Waste Transporter's Licence</td><td>10233</td></tr>
<tr><td>EPA Dangerous Goods Vehicle Licence</td><td>5086117</td></tr>
<tr><td>Sydney Water Trade Waste Agreement Number</td><td>25627</td></tr>
<tr><td>Scheduled Activities</td><td>• Container reconditioning
• Waste processing (non-thermal treatment)</td></tr>
<tr><td>Permitted Waste Types (EPL)</td><td>
<table>
<tr><th>Waste</th><th>Description</th><th>Activity</th></tr>
<tr><td>General or specific exempted waste</td><td>Waste that meets all the conditions of a resource recovery exemption under Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2019</td><td>As specified in each particular resource recovery exemption</td></tr>
<tr><td>Containers & drums containing controlled waste residues</td><td>Containers and drums that are contaminated with residues of substances referred to in Parts 1 and 2 of Schedule 1 of the Protection of the Environment Operations (Waste) Regulation 2014.</td><td>Container reconditioning Waste processing (non-thermal treatment)</td></tr>
<tr><td>Containers & drums containing controlled waste residues</td><td>Containers with drums contaminated with residues of liquid waste</td><td>Container reconditioning Waste processing (non-thermal treatment)</td></tr>
</table>
</td></tr>
</table>

Scale of Activities (Current Authorised)	• Container reconditioning: Any capacity to recondition, recover, treat or store • Waste processing (non-thermal treatment): Any annual processing capacity
Current Infrastructure on Site	Forklift, car parking area, Site office, hardstands, plant and machinery, warehouse, effluent treatment plant, IBCs storage and processing area, firefighting equipment (shown in Figure 2)
Operating Hours	• Monday to Friday: 7am to 5pm • Saturday: 7am to 12 noon • No works are permitted on Sundays or Public Holidays

2.1 Site Operation Overview

2.1.1. Receival and Preparation

Prior to collection, TMA issues a collection ticket form, which must be completed by the generator (client). Once TMA approves the details of the upcoming IBCs, the containers are transported to the Site. The Site doesn't accept IBCs with residual liquid that contain more than 1 % of the capacity of the IBC or 10 L. The Site receives used, unwashed IBCs from a range of clients on trucks (TMA trucks) and enters the Site through the driveway located at Redfern Street.

Upon arrival, the IBCs are inspected for residual contents and classified based on the labels indicating their previous contents. The containers are either sent directly to the decontamination process or stored in the designated storage bay area until they are processed.

IBCs containing similar residual wastes are cleaned in batches to ensure proper segregation of the residual materials. The first step in the decontamination process involves the removal of labels, which is done using a burner and torch. This step occurs only when the containers are scheduled for decontamination.

2.1.2. Emptying

Before arriving at the Site, TMA rejects IBCs from customers if they contain more than 1% residual liquid. At the TMA facility, IBCs with non-dangerous goods have their residuals extracted using a vacuum system. This extracted material is collected in a clearly labelled IBC designated as "waste IBC (slop IBCs)". These slop IBCs are labelled as J120 non-hazardous liquid waste. These waste IBCs are then transported to an off-site waste collection facility. The standard procedure for receiving and processing IBCs at the Site allows for empty IBCs with normal residues of no more than one litre (L). On average, approximately 18 - 20 waste IBCs are filled every two months, depending on the supply and demand for IBCs.

The IBCs with DG residual wastes are decanted into an IBC of 1000L capacity. The IBCs are kept within the bunded building prior to return to the generator when full at first appropriate transport or sent to facility that can lawfully accept them.

2.1.3. Internal Rinse and External Wash

The IBCs then go through a conveyor belt by a forklift and passes through caustic detergent-water mixture system. All IBCs further go through an external hot, high-pressure wash while on the wash conveyor. An operator uses a pressure washer to spray the external surfaces of the IBC. Wastewater is collected and sent to waste-water treatment.

2.1.4. Leakage Testing and Drying

Following the internal rinse, IBCs undergo pressure testing by being filled with compressed air to a specified pressure and maintained for a designated duration. The pressure is monitored to ensure there is no drop on the pressure gauge. After leak testing, hot air is blown through the IBCs to dry them. Any IBCs that fail the leakage testing are cut up and recycled.

2.1.5. Ready for Delivery

The cleaned IBCs are stored temporarily in a separate location away from the unwashed IBCs prior to loading into trucks for delivery to appropriate locations. A comprehensive Site operation process is discussed in the TMA's Process Management Plan (4Pillars' reference: 20240614BIC-A_PMP_V1.2).

3. Roles and Responsibilities

The following table (Table 2) presents a brief outline of key positions and responsibilities associated with implementation of the PIRMP at TMA.

Table 2: TMA Roles and Responsibilities

Responsibilities	Responsible Person
PIRMP activation, implementation, review, testing and training	Name: Anthony Alpen Role: Managing Director Phone: 0419 616 224 Email: anthony@tankmanagement.com.au
Notification of relevant authorities	Name: Anthony Alpen Role: Managing Director Phone: 0419 616 224 Email: anthony@tankmanagement.com.au
Managing response to pollution incident	Name: Anthony Alpen Role: Managing Director Phone: 0419 616 224 Email: anthony@tankmanagement.com.au

3.1 Site Visitors

Employees, contractors, and visitors are to be inducted to the Site by the Site Supervisor. The individuals then accept a duty of care and the responsibility to ensure that any accidents, incidents, and near misses are reported through the correct channels. During an emergency or incident, they are obligated to follow procedures and authorised instruction, provided this does not place them at any additional risk. As such, they are required to commit to understanding the PIRMP and emergency plans.

3.2 Notification to Relevant Authorities

The contact details of relevant authorities which may require contact in the event of a pollution incident are detailed in Table 3 below. Contact details for other relevant persons and organisations are summarised in Sections 5.2 and 5.2.5.

Table 3: Authority Contacts Requiring Notification During a Pollution Incident

Authority	Description	Contact information
NSW Environment Protection Authority (EPA)	Main environmental regulator for Sites with an EPL	131 555
Fairfield City Council	Local government environmental regulator	(02) 9725 0222
NSW Ministry of Health	Public health regulator	(02) 9391 9000
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

3.3 Neighbours and Community

The Site is located in an established industrial area, surrounded by commercial factories and warehouses. Figure 3, Appendix 2 provides the list of receivers located within 500 m of the Site.

The nearest residential property zoned as "R2: Low Density Residential" is located approximately 450 m to the southeast of the Site.

4. Hazard Assessment

4.1 Inventory of Pollutants

The chemicals and hazardous materials stored on Site are identified in the inventory of pollutants below in Table 4. The identification, storage, handling and disposal of chemicals and hazardous substances at the facility is guided by Material Safety Data Sheets (MSDS). The inventory of pollutants is dependent on variable Site conditions and subject to change. Should the types and maximum quantities of pollutants stored on Site vary, the inventory of pollutants will be updated promptly. Storage locations on Site are shown in Table 4. Figure 5 shows the potential pollutants on Site.

Table 4: Inventory of Pollutants

Name of Substance	Size	Quantity Stored	Location of Substance	Chemical Classification as per ADG Code	Hazardous Substance? Yes/No	Dangerous Goods? Yes/No	Labelled? Yes/No	Used For
Acetylene	4.1 m/3 cyl.	1 cylinder	Welding bay	Class 2, Division 2.1	No	Yes	Yes	Mig welder
Caustic soda liquid 25%-50%	1000 L IBC	1000 L	Effluent treatment plant	Class 8	Yes	Yes	Yes	Internal wash of tanks
Caustic soda pearl	25 kg bag	250 kg	Effluent treatment plant	Class 8	Yes	Yes	Yes	Cleaning of IBCs
Cold galv – 400g can	400 g can	60 cans	Flammable storage area	Class 2, Division 2.1	Yes	Yes	Yes	Finishing/painting
De-rust Lubricant	20 L drum	20 L	Back corner shelf	Class 2, Division 2.1	Yes	No	Yes	Lubrication – plant
Diesel - Shell	25 L jerry can	75 L	Flammable storage area	-	Yes	No	Yes	Break down polymers in cleaning of IBC's
Gun wash	1000 L IBC	1000 L	Flammable storage area	Class 2, Division 2.1	Yes	Yes	Yes	Cleaning of tanks
Liquified Petroleum Gas (LPG)	15 kg cylinder	3 in use, 9 spares	Forklifts	Class 2, Division 2.1	No	Yes	Yes	Forklifts

Machine Dishwashing Powder	5kg	5kg	Flammable storage area	Class 8	Yes	Yes	Yes	Cleaning of tanks
Methyl ethyl ketone (MEK)	20 L drum	100 L	Flammable storage area	Class 3	Yes	Yes	Yes	Stainless steel tank paint removal
Oxygen	9 kg cylinder	9 kg cylinder	Welding bay	Class 2, Division 2.2	No	Yes	Yes	Oxy cutter
Specialised Acid Wash Hydrochloric acid	25 L drum	500 L	Mezzanine	Class 8	Yes	Yes	Yes	External Wash for stainless steel IBC's
Silver Galv Aerosol	400 g can	60 cans	Flammable storage area	Class 2, Division 2.1	Yes	Yes	Yes	Finishing/painting of IBCs
Supashield 07	10.5 m/3 cylinder	1 cylinder	Welding bay	Class 2, Division 2.2	No	Yes	Yes	Welding
WW CG 87 – Clearflox Aluminium chloride hydroxide	1,000 L IBC	1000 L	Waste water treatment	-	No	No	Yes	Waste water treatment

4.2 Safety Equipment

A summary of the safety equipment and devices used at the premises to minimise risks to human and environmental health, and to maintain and to control a pollution incident is presented in Table 5. Regular inspections, inventory checks, and servicing of equipment will be carried out in accordance with relevant standards and manufacturer's instructions. Training will be carried out with staff to ensure that all personnel are capable of operating safety equipment. Specific locations of safety equipment are shown in Table 5. The locations of the safety and emergency equipment are shown in Figure 6.

Table 5: Safety Equipment Locations and Quantity

Equipment	Location (s)	Quantity
Portable emergency spill kit	Next to lunchroom	1
General Personal Protective Equipment (PPE)	Site office and lunchroom	Numerous
Fire hose reels	Work area	3
Fire extinguishers	Work area	Numerous
First aid kit	Lunchroom	2

Eye wash area	Work area	3
Dangerous goods signage and guidelines	Throughout the Site	Numerous
Traffic control cones and signage	Throughout the Site	Numerous
Radios	Site Office, in operational plant and vehicles	Numerous

4.3 Mitigations and Pre-emptive Actions

4.3.1 General

Effective avoidance of the occurrence of pollution incidents is reliant on an effective system of maintenance and inspections. The Site Supervisor or their delegate (i.e., Environment/Community Advisor) is to ensure that Site inspections are carried out regularly and that plant and equipment is inspected by operators prior to the commencement of work. General pre-emptive actions for the prevention of a pollution incident include:

- Adequate training program (see Section 5.1.1) including appropriate training of all Site staff in the prevention and management of pollution incidents.
- Strict adherence to Safe Work Method Statements (SWMS) and procedures for any major tasks.
- Storage of unwashed IBCs in a covered, ventilated, bunded area away from the stormwater drain.
- Refuelling plant in designated and contained areas only.
- Appropriate storage and handling of all waste, chemicals and hazardous materials.
- Maintenance and servicing of plant and equipment in designated areas only.
- Appropriate maintenance and management of on-Site water management system.
- Maintaining safety equipment in appropriate locations on Site (Section 4.2).

4.3.2 Flammable Liquid and Gas

Flammable liquids and gases will be stored on Site. Mitigations and pre-emptive actions for the prevention of a combustion incident include:

- Flammable liquid and gases will be stored within hazardous chemical storage containers.
- All flammable liquids must be stored properly in safety cabinets or chemical storage containers complaint with relevant guidelines and must not exceed the maximum capacity storage requirements.
- All flammable liquid storage areas must be separated from ignition sources (e.g., power points) by at least 3 metres.
- Flammable gases will be stored in cages outdoors and separated from ignition sources (e.g., power points) by at least 3 metres.
- Flammable liquid and flammable gas storage areas have clear signage.
- Flammable liquid storage areas must be separated from incompatible chemicals by at least 5 metres.
- Any flammable liquid spills or gas leaks must be contained immediately.

4.3.3 Chemicals and Fuel

Various chemicals are stored at the facility including but not limited to lubricants and oils, diesel fuel, and industrial and domestic cleaners. These chemicals and fuels are located in a bunded storage area to contain any spills. To prevent an incident involving chemicals or hazardous materials, the following pre-emptive actions will be taken:

- Staff are required to observe safety disclaimers and instructions provided on packaging and MSDS's.
- Chemicals must be stored according to their respective MSDS.

- Chemicals will be kept inside the hazmat chemical area, or stored in self-bunded chemical storage containers, as required.
- Flammable liquids will be stored in a self-bunded area within the hazardous chemical area.
- Incompatible materials must be separated by at least 5 metres.
- Any chemical or fuel spills must be contained immediately.

4.3.4 Contaminated Water

The Site consists of an effluent treatment plant, drains and three catchment zones (Catchment 1, Catchment 2, Catchment 3) as a part of the on-Site water management system as shown in Figure 4. The Site has installed drain valves in Catchment 2 and 3. The valve in Catchment 2 remains closed to ensure no wastewater leaves the Site. Furthermore, bunds are established throughout the Site where appropriate to ensure no contaminated water or runoff leave the Site. To prevent an incident involving off-Site runoff of contaminated water, the following pre-emptive actions will be taken:

- Monitoring and maintenance of on-Site water detention system in Catchment 1.
- Regular monitoring and maintenance of metal bunding and silicone seals around Catchment 2.
- Regular housekeeping of the hardstand area.
- No storage of unwashed IBCs outside the building in Catchment 2.
- Storage of aggregated or rejected IBCs that contain liquid on pallets in Catchment 2.

4.4 Risk Assessment

The following risk assessment matrix has been developed and applied to the known hazards at the Site. The risk matrix is detailed in Table 6.

Qualitative categories have been used to assign 'likelihood' of incidences. A qualitative evaluation has also been utilised to assign a category to the 'consequences' of a pollution incident. The risk rating assigned to each incident type is numerical, with 1 being the lowest and 25 being the highest. The rating is calculated by multiplying the 'likelihood' by the 'consequence'.

Table 6 also details the risk of the hazard to the environment by assessing the likelihood and the consequences potential of the hazard. The risk assessment is undertaken in consideration of the hazards potential to impact the environment and to minimise any environmental consequences should an environmental incident occur. The risk assessment of the hazards has been undertaken considering a scenario where mitigation measures have been implemented. This scenario is reflective of the actual conditions on the Site, as per the mitigation measures and pre-emptive actions presented in Section 4.3.

Table 6: *Risk Assessment of the types of incidents that may occur on the Site, both with and without mitigation measures implemented.*

Hazard	Likely Source & Location	Potential Impact Type (s)	Risk Assessment Pre-Mitigation			Risk Assessment Post-Mitigation (reflective of actual Site conditions)		
			Likelihood (uncontrolled)	Consequence (uncontrolled)	Risk Rating	Likelihood (controlled)	Consequence (controlled)	Risk Rating
Fuel spill - minor (i.e. contained within bunded area)	Plant and machinery, Work area	Human health, soil, surface water, groundwater, fire risk	4	2	8 HIGH	3	2	6 MODERATE
Fuel spill - major (i.e. permeating hardstand, escaping bunded area, proximity to ignition sources or incompatible chemicals)	Plant and machinery, Work area	Human health, soil, surface water, groundwater, fire risk	4	4	16 EXTREME	2	3	6 MODERATE
Hazardous chemical spill - minor	Flammable storage area	Human health, soil, surface water, groundwater, fire risk	4	2	8 HIGH	3	2	6 MODERATE
Hazardous chemical spill - major (i.e. permeating hardstand, escaping bunded area, proximity to ignition sources or	Flammable storage area	Human health, soil, surface water, groundwater, fire risk	4	4	16 EXTREME	2	3	6 MODERATE

stormwater system)								
Run-off of contaminated water to Council's stormwater system	Work area, effluent treatment plant	Human health, soil, surface water, groundwater	4	4	16 EXTREME	2	1	2 LOW
Gas leakage – major (i.e. proximity to ignition sources)	Plant and machinery, Work area	Human health, air, fire risk	3	4	12 HIGH	2	3	6 MODERATE
Fire	Whole Site	Human health, air	4	5	16 EXTREME	2	4	12 HIGH
Explosion	Whole Site	Human health, fire	4	4	16 EXTREME	2	4	12 HIGH
Vehicle Collision	Whole Site	Human health, fire risk	3	3	9 HIGH	2	3	6 MODERATE
Medical Emergency	Whole Site	Human health	3	3	9 HIGH	2	2	4 MODERATE

5. Pollution Incident Response

5.1 Minimising Harm to Persons on the Premises

Minimising harm to people on the premise includes any action or arrangement that will be in place to minimise the risk of harm to any people who will be on the Site or who are likely to be on the Site should an incident occur. TMA employees and sub-contractors will be instructed to contact the Managing Director or Site Supervisor immediately if they are in doubt over any part of this PIRMP or their responsibilities.

5.1.1 Training

The best and most effective method for minimising harm to all persons on the premises, including employees, visitors, and subcontractors, is through education, training, and provision of appropriate resources to control hazards. All persons working on the Site, employees and subcontractors, and persons visiting the Site, are required to attend an induction program which reviews the contents and location of the PIRMP. All employees and regular subcontractors must attend the regular toolbox meetings, where they are openly encouraged to raise issues of concern. Employees, sub-contractors, and visitors will be provided with and instructed on the correct use of appropriate personal protective equipment.

Training often takes the form of on-the-job training of employees in the use of plant and equipment as well as reinforcement of the various management plans and systems in place.

Recommended training regime includes:

- Induction – upon new person entering the Site.
- Weekly toolbox talks with staff and regular contractors.
    - PIRMP location and procedure to be reviewed with staff at least monthly.
- Monthly training sessions for all staff to review location, procedure, and test drills of the PIRMP.
- 12-monthly routine testing of the PIRMP.

5.1.2 Signage

The Site contains adequate signage including:

- Emergency evacuation point
- Traffic speed signs
- First aid equipment signs
- Personal Protection Equipment (PPE) signage

It is the responsibility of the Site Supervisor to ensure all signage is in good condition and visible in case of a pollution incident.

5.1.3 Activation of Evacuation Procedures

The PIRMP should outline the conditions under which employees and people on-Site should evacuate the premises, when they should stay and assist in cleaning up a pollution incident, and what precautions people should take to minimise any harm to themselves (see Sections 5.2 and Appendix 3).

5.2 During an Incident

Important note: The Pollution Incident Response Procedure (Appendix 3) contains a simple flow chart, for use when a pollution incident occurs. The Procedure also contains all relevant contact details for authorities and other stakeholders. The Site Supervisor must identify which incident response procedure is best aligned with the one at hand and respond accordingly. Variations to the recommended response detailed in the Procedure may be authorised and carried out at the discretion of the Managing Director or Site Supervisor. The Procedure is provided as Appendix 3. This section provides a high-level overview of the Procedure.

5.2.1 Incident Identification

Any employee or contractor who suspects or confirms that a pollution incident has or is about to occur, shall immediately notify the Managing Director or the Site Supervisor. If the employee is trained to respond to the incident, they may do so,

provided that someone else is on hand to raise the alarm. The Site Supervisor should notify the Managing Director or their delegate of the incident immediately.

The Procedure is to be implemented and followed at the discretion of the Site Supervisor.

5.2.2 *Immediate Actions for Minimisation and Control*

- As soon as it is safe to do so, stop work and stop the process causing the environmental incident.
- Assess the risk, and if possible, contain the pollution source to limit any additional contaminant release. This includes the deployment of spill containment equipment, and use of firefighting equipment if appropriate.
- Isolate the area from workers, visitors, and other people including the public by erecting barricades to ensure there is no unauthorised access to the pollution incident.

5.2.3 *Risk to Environment or Human Health*

- If the incident has any risk of material harm to the environment (on or off the Site), environmental amenity (off-Site) or human health, the Site Supervisor will follow the Procedure to determine category and type of event and contact the relevant emergency services and management authorities (see Section 5.2.5 for contact information).
    - Section 148 of the *POEO Act* states that relevant regulator(s) and management authorities must also be notified if there is a risk of material harm to the environment.
- For certain incidents, the Procedure may state that stakeholders need to be notified of the incident.

5.2.4 *Notification to Regulators or Stakeholders*

Stakeholders may also need to be notified of an incident; however, this is at the discretion of the Managing Director (unless it is required by the regulator or relevant management authority). Neighbours and regulators should be contacted on the phone numbers provided in Table 2, **Error! Reference source not found.** and *Table 8*.

Information that should be provided to the EPA, or other regulators, includes:

- Time, date, location, nature and duration of the event.
- Location of the place(s) where pollution is occurring or is likely to occur.
- Nature, quantity and concentration of any pollutants involved.
- Suspected cause of the incident.
- Actions taken to control the situation.
- Actions taken to mitigate any environmental harm and/or environmental nuisance caused by the event.
- Proposed action(s) to prevent a recurrence of the event.
- Any other information that may be requested by regulatory authorities.

5.2.5 *Pollution Incident Contact Details*

Table 7: Contact Details for Persons and Organisations Relevant to Pollution Incident and Emergency Response.

Contact	In case of….	Number
Anthony Alpen (Managing Director)	Any pollution incident	0419 616 224
Peta Mascall (Site Supervisor)	Any pollution incident	0409 464 542
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500

Greenway Medical Hub	Local medical clinic for treatment of minor injuries	(02) 9756 1567
Fairfield Hospital	Local hospital for serious (non-life-threatening) injuries	(02) 9616 8111
Fire and Rescue NSW Smithfield Fire Station	Assistance with fire or pollution incident response	(02) 9493 1041
Wetherhill Park Police Station	To report non time-critical crime, such as vandalism or illegal dumping	(02) 8788 5199
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234
Optus Operator-assisted directory services	For connection to key contacts and phone numbers	124937

5.3 Post-incident

5.3.1 Clean Up

The Quick Reference Guide in the Procedure outlines clean up procedures for incidents (Appendix 3).

5.3.2 Internal Reporting

A 'post-incident report' is to be completed by all staff involved in a pollution incident and forwarded to the Site Supervisor or their delegate prior to leaving the Site that day. Employees involved in a pollution incident are not permitted to leave the Site unless approved to do so by TMA Management, or a representative of the Emergency Services (if in attendance).

The Site Supervisor or their delegate is responsible for ensuring that all required information has been collected, and that all concerned parties have completed a report. The Site Supervisor or their delegate must also complete a separate 'post-incident report'. A hard and soft copy of each post-incident report is to be retained.

5.3.3 External Reporting

The Site Supervisor or their delegate will prepare a report that satisfies regulator reporting requirements in a timely manner following a regulator-notifiable incident or stakeholder-notifiable incident. Once this report has been reviewed and approved by the Managing Director, it is to be forwarded to the EPA, other relevant regulators, and management authorities on behalf of the company. This is to occur within the timeframes set out by the relevant regulators. Any follow up information requested by the regulator(s) is to be authorised by the Managing Director and provided in a timely manner.

5.3.4 Review and Update the PIRMP

Following any incident (other than a non-notifiable incident), the PIRMP must be tested (and revised if necessary) within one month, as per section 153E of the POEO Act and section 75 of the General Regulation. Testing of a PIRMP following an incident must assess, in the light of that incident, whether 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. If the answer to this is 'no', then the PIRMP must be revised to address any gaps or deficiencies identified.

5.4 Management

5.4.1 Training Requirements

The objectives of the training program that is to complement this Plan is to ensure that all Site staff are aware of the contents of the PIRMP, such that they understand environmental and safety issues in the workplace and are aware of their responsibilities in the event of a pollution incident. Information is to be disseminated through Site inductions, toolbox talks and ongoing training.

The Managing Director or their delegate is responsible for the administration of materials and maintenance of records for all inductions and ongoing training. At a minimum, records of training will contain details of who facilitated and received the training, when the training was undertaken, and what the training involved. Where applicable, test scores and simulation outcomes should also be carefully noted.

Contractors and visitors to the Site will also be subject to inductions and ongoing training as deemed appropriate by the Managing Director or their delegate. Details and copies of any relevant licenses, certificates and/or qualifications held by employees and contractors will also be recorded and maintained by the Managing Director or their delegate. It is the responsibility of all employees and contractors working on the Site to work in a safe manner and to look after the interests of their fellow workers.

Inductions and ongoing training requirements should be routinely reviewed and revised as deemed appropriate by the Managing Director or their delegate. Throughout this process, considerations should be made for but not limited to changes in procedures and regulations, as well as any errors or deficiencies in job performance and in reporting.

Desktop simulation and pollution incident drill testing procedures, as required under section 153E of the POEO Act, section 75 of the General Regulation, and outlined in Appendix 3, provide an interactive training experience for employees. Scenarios are designed to be reflective of an incident that may be encountered on Site, however, are implemented in a controlled and hazard free environment.

5.4.2 Testing the PIRMP

As per section 153E of the POEO Act and section 75 of the General Regulation, a PIRMP must be tested routinely at least once every 12 months. The testing must be carried out in a manner as to "ensure that the information included in the plan is accurate and up to date and that the plan is capable of being implemented in a workable and effective manner". The PIRMP may be tested in a variety of ways, including basic review, desktop simulation and practical exercises or drills. Testing must cover all aspects of the plan, including the effectiveness of training. PIRMP's must also be tested within one month of any pollution incident occurring during an activity and to which a licence relates. This post-incident test must assess whether the information contained in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Plans must include all relevant details with regard to the:

- Manner in which the PIRMP is to be tested and maintained.
- Dates on which they have been tested and the name of the staff members who carried out the testing.
- Dates on which they are updated or revised.

5.4.3 Testing Procedures

Testing of the PIRMP may occur as a desktop simulation or a pollution incident drill. Once the test is complete, it will be followed by a PIRMP review. Any issues identified during the test will be rectified during the subsequent revision of the plan. The decision on which testing procedure to use is at the discretion of the Managing Director or their delegate. The decision will be taken into account prior performance, the occurrence of any incidents in the preceding period, substantial changes in regulatory frameworks and other relevant matters.

5.4.4 Desktop Stimulation

Responsibility for implementation: Managing Director or their delegate.

Procedure: The procedure for a desktop simulation is as follows:

1. The Managing Director or their delegate assembles all relevant personnel in the office.
2. The Managing Director or their delegate identifies a type of 'Regulator notifiable incident' or a 'stakeholder-notifiable incident' (i.e., risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e., fire, contaminated water overflow to soil/stormwater system). The employee is the person who has identified the hypothetical incident.
3. Using the procedures outlined in the PIRMP, the persons present move through the steps in the process, documenting what action is taken at each step.
4. At the end of the process, the persons present discuss the incident response and identify any weaknesses or deficiencies in the PIRMP process that were identified.

5.4.5 Pollution Incident Drill

Responsibility for implementation: Managing Director and their delegate (i.e., Environment/Community Advisor).

Procedure: The procedure for a pollution incident drill is as follows:

1. The Managing Director identifies a type of 'Regulator-notifiable incident' or a 'stakeholder-notifiable incident' (i.e., risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e., leachate escape to soil or illegal waste dumping incident with hazardous vapours) (it should be different to the scenario that will be used in the desktop simulation).
2. The Managing Director then instructs an employee to commence the simulation at an unspecified time on a specified date (the Managing Director may suggest an approximate time, but the employee should determine when to commence the drill).
3. The employee commences the drill by notifying their Managing Director of the (pre-determined) incident.
4. The Managing Director must then commence the process outlined in the PIRMP that is relevant to the particular incident (including identifying the immediate response required);
5. The Managing Director is to be contacted for the purposes of the drill, but no actual notification of external parties is required (although, it should be documented which external parties would be notified in a real pollution incident scenario);
6. All parties involved in the drill will meet following the conclusion of the drill to debrief and discuss the process and any deficiencies identified in the process. This should also include a review of how prepared and well-equipped persons were to immediately respond to the incident, where relevant (i.e., was appropriate spill control equipment available for a spill incident?);
7. The Managing Director or their delegate is to document the drill, minute the debrief discussion and raise remedial actions for any deficiencies identified in the process.

5.4.6 PIRMP Review

Responsibility for implementation: Environment/Community Advisor and Managing Director.

Procedure: A basic review of the PIRMP will involve the Managing Director, or relevant delegate (i.e., Environment/Community Advisor) conducting a review of all information in the plan, paying particular attention to the following elements:

- Contact details;
- Regulatory/legislative context;
- Site capacity;
- Relevant hazards;
- Hazard inventory and location;
- Site safety equipment;
- Training provisions (training records should also be inspected to gauge compliance); and
- Site details (including maps and other diagrams);
- Local area e.g., new service stations, hospitals, roads, stormwater infrastructure, dangerous goods depots etc.

The document is to be revised and re-issued following the review. The Managing Director must ensure that all relevant persons are re-trained in the PIRMP following the review, with a particular focus given to sections that have been changed.

6 Appendices

Appendix 1. Figures

Appendix 2. Receivers located within 500 m of the Site

Appendix 3. Pollution Incident Response Procedure

Appendix 1: Figures

Figure 1: Site Locality.

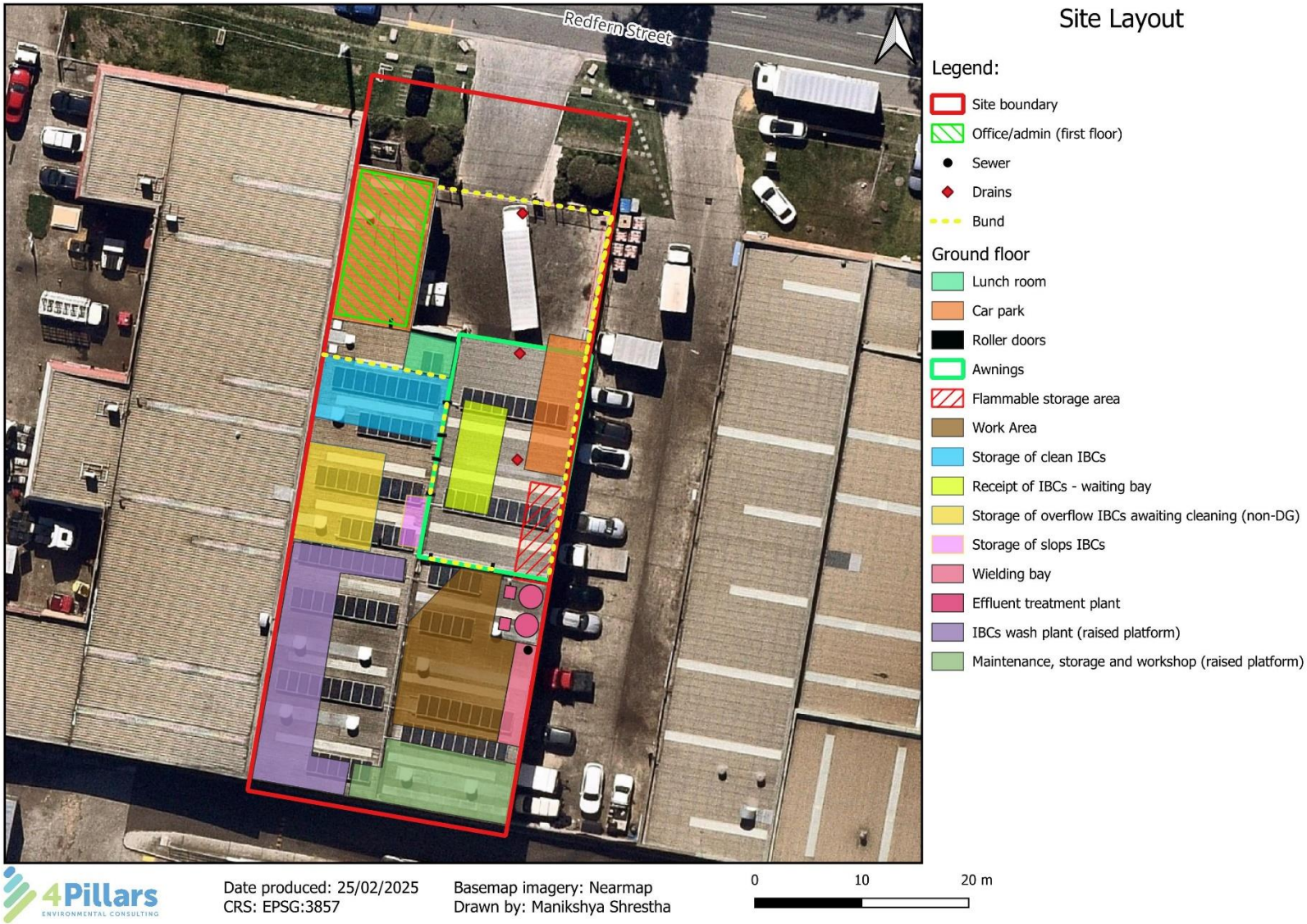

Figure 2: Current Site Layout.

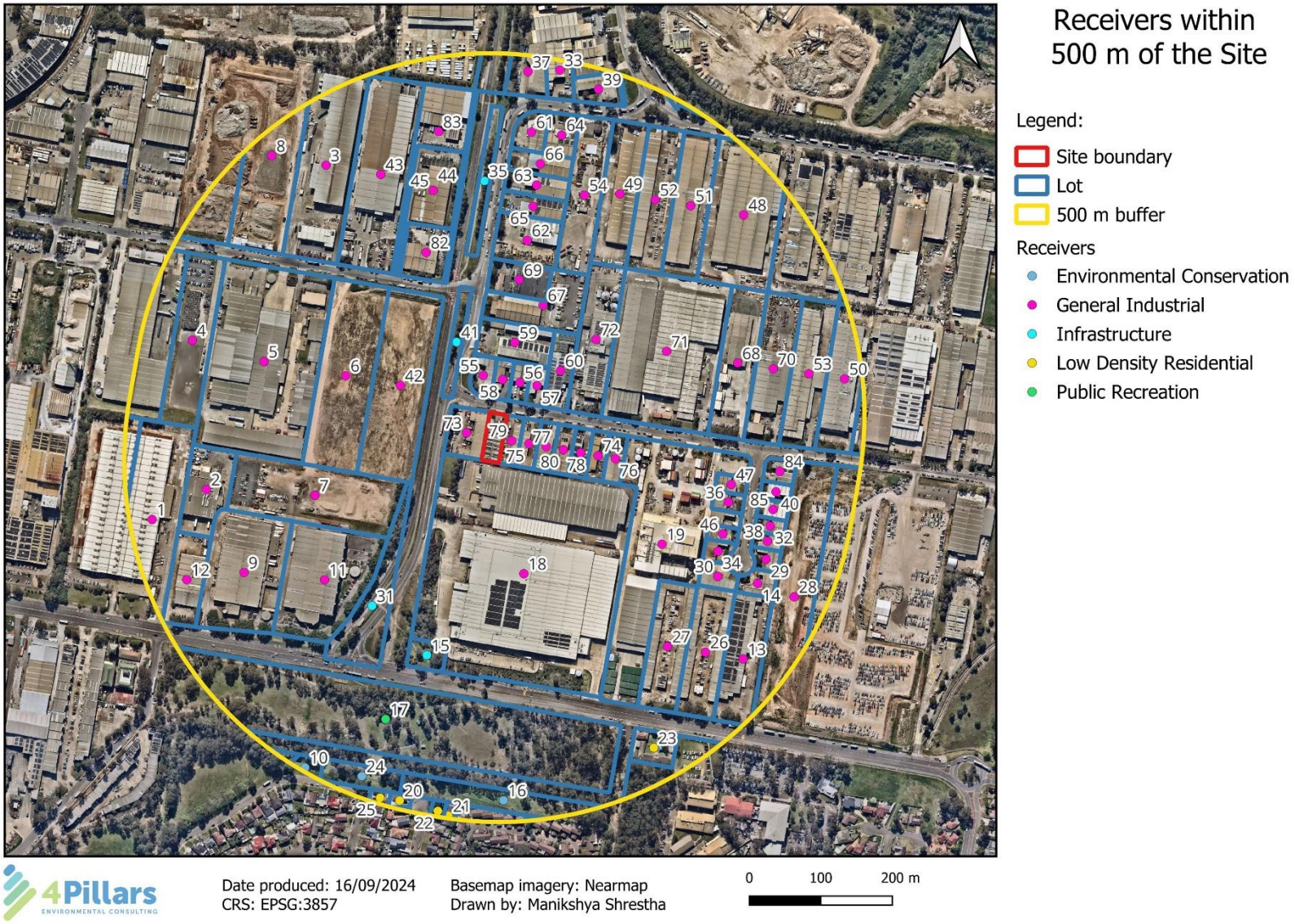

Figure 3: Receivers within 500 m of the Site.

Figure 4: On-site Water Management System.

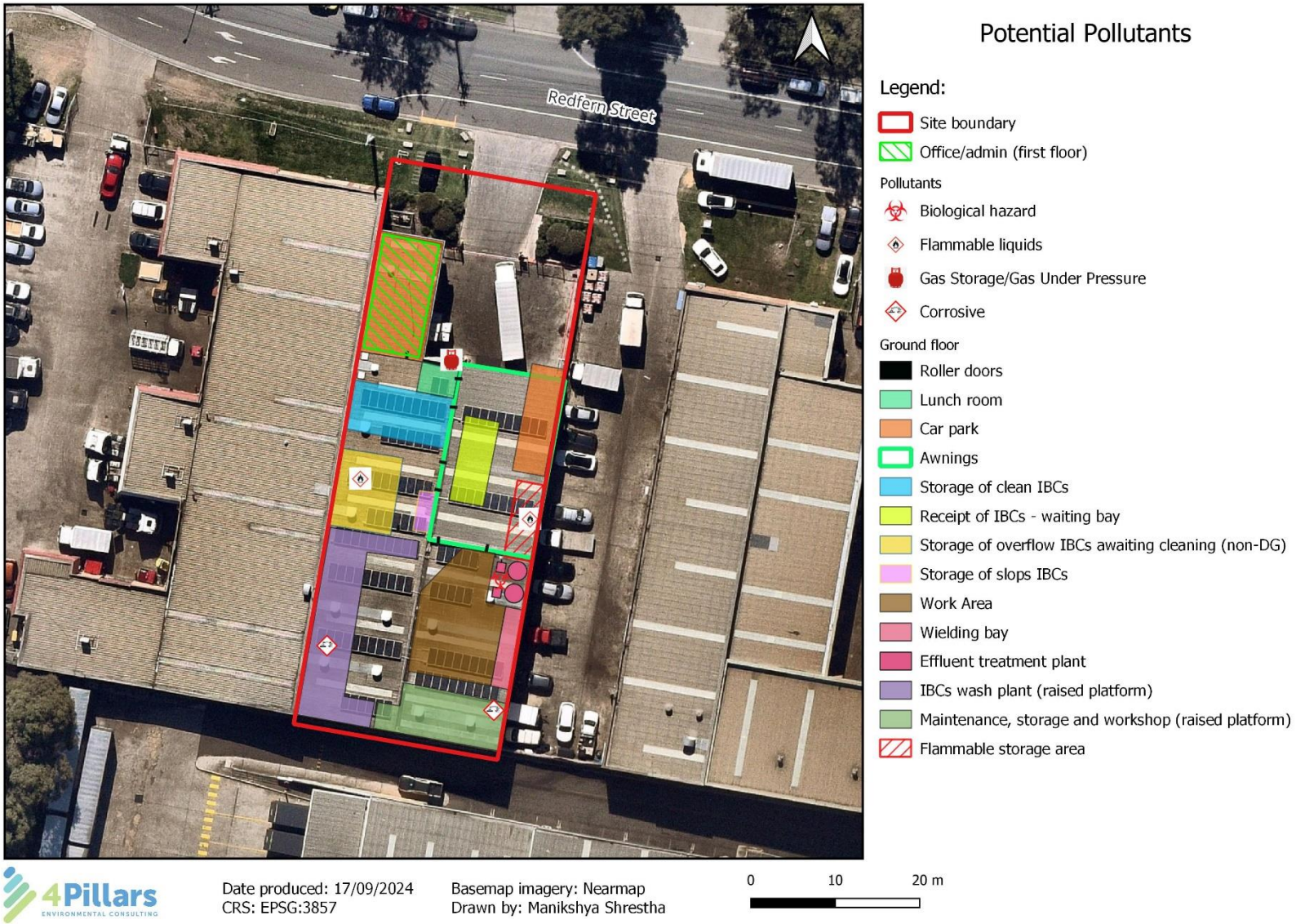

Figure 5: Potential Pollutants.

Figure 6: Emergency Equipment on Site.

Appendix 2: Receivers located within 500 m of the Site

Table 8: Receivers within 500 m of the Site. Locations shown in Figure 3.

ID	Address	Type of receiver	Contact
1	374 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
2	11 Walter Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
3	35-37 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
4	26 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
5	30-36 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
6	38 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
7	19 Walter Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
8	27 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
9	350 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
10	14 Maugham Crescent, Wetherill Park NSW 2164, Australia	Environmental Conservation	Notification to Council
11	340-348 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
12	360 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
13	268 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
14	7 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock

15	2-6 Walter Street, Wetherill Park NSW 2164, Australia	Infrastructure	Notification to Council
16	361 Victoria Street, Wetherill Park NSW 2164, Australia	Environmental Conservation	Notification to Council
17	6A Walpole Close, Wetherill Park NSW 2164, Australia	Public Recreation	Notification to Council
18	26-32 Walter Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
19	63-65 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
20	6 Walpole Close, Wetherill Park NSW 2164, Australia	Low Density Residential	Phone call/letter drop/door knock
21	8 Walpole Close, Wetherill Park NSW 2164, Australia	Low Density Residential	Phone call/letter drop/door knock
22	7 Walpole Close, Wetherill Park NSW 2164, Australia	Low Density Residential	Phone call/letter drop/door knock
23	295 Victoria Street, Wetherill Park NSW 2164, Australia	Low Density Residential	Phone call/letter drop/door knock
24	6A Walpole Close, Wetherill Park NSW 2164, Australia	Environmental Conservation	Notification to Council
25	18 Maugham Crescent, Wetherill Park NSW 2164, Australia	Low Density Residential	Phone call/letter drop/door knock
26	272-274 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
27	276-278 Victoria Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
28	7 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
29	6 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
30	9-10 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
31	340 Victoria Street, Wetherill Park NSW 2164, Australia	Infrastructure	Phone call/letter drop/door knock
32	4 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock

33	197 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
34	11 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
35	106 Redfern Street, Wetherill Park NSW 2164, Australia	Infrastructure	Phone call/letter drop/door knock
36	14 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
37	199 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
38	5 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
39	1 Widemere Road, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
40	2 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
41	86 Redfern Street, Wetherill Park NSW 2164, Australia	Infrastructure	Phone call/letter drop/door knock
42	38 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
43	39-41 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
44	45 Frank Street, Wetherill Park NSW 2164, Australia	Infrastructure	Phone call/letter drop/door knock
45	45 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Notification to Council
46	12 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
47	15 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
48	126 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
49	134 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
50	46 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock

51	130 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
52	130 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
53	50 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
54	136 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
55	86 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
56	82 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
57	80 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
58	84 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
59	88 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
60	78 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
61	140 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
62	100-102 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
63	106 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
64	138 Hassall Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
65	104 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
66	108 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
67	92-94 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
68	58-60 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock

69	100-102 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
70	54 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
71	62-64 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
72	74-76 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
73	91D Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
74	77 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
75	85A Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
76	75 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
77	83 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
78	79 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
79	87 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
80	81 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
81	89 Redfern Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
82	47 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
83	43 Frank Street, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
84	1 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock
85	2 Blackfriar Place, Wetherill Park NSW 2164, Australia	General Industrial	Phone call/letter drop/door knock

Appendix 3: Pollution Incident Response Procedure

Tank Management Australia Pty Ltd

Pollution Incident Response Procedure

89 Redfern Street, Wetherill Park, NSW 2164

Pollution Incident Occurs

If incident is identified by a staff member or contractor, notify the Site Supervisor or their delegate (i.e., Environment/Community Advisor).

Is there a risk of 'material harm to the environment' (on or off-Site)?

NO

Is there an immediate risk to human health, property (on or off-Site) or environmental amenity?

NO

Non-notifiable incident:

Any pollution impacts (spill, vapours, gases) must be managed as per the direction of the Site Supervisor or their delegate. All post-incident required internal remediation, and reporting is at the discretion of the Site Supervisor and is to be completed in a timely manner.

YES

Internally notifiable incident:

Call 000 or 112 from a mobile phone for police, ambulance, or fire, as required.

The Managing Director must be notified of the matter. All reasonable steps must be immediately taken to protect human life, then property. This is at the discretion of the Managing Director. All post-incident required internal remediation, and reporting is to be completed in a timely manner. Neighbours may also need to be notified if their property is (or is likely to be) impacted. A review of the PIRMP will be carried out.

YES

If there is an immediate risk to human health/safety – **call 000 or 112 from a mobile phone**

Regulator-notifiable incident:

All relevant regulatory authorities must be notified immediately (this should not be more than 1 hour after the incident). All directions from regulatory authorities must be complied with. All post-incident required internal remediation, and reporting is to be completed in a timely manner. A review of the PIRMP will be required.

Are there off-Site* impacts (i.e., Council's stormwater system or emissions to air) or has stakeholder notification been requested by a regulatory authority?

NO

Continue to comply with the directions from the regulatory authorities and continue with incident response. Complete all post-incident documentation, as required. Review PIRMP, following the avoid-mitigate risk management hierarchy.

YES

Stakeholder-notifiable incident:

In addition to actions required by regulators, neighbours, and all other relevant stakeholders (this may include customers, clients, business partners etc.) must be notified of the incident and the status of response. All post-incident required internal remediation, documentation and reporting is to be completed in a timely manner and provided to the relevant parties. A review of the PIRMP will be required, following the avoid-mitigate risk management hierarchy.

1. Quick Reference Guide - Incident

Table 1: Quick reference guide for different types of incidents that may occur at the Site.

Type of Material	Incident Type	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Fuel/Hydrocarbon	Minor spill (i.e. contained within bunded area)	Internally notifiable incident	1. If possible, shut off or contain the source of the spill. 2. Take all steps to remove sources of ignition. 3. Lay down spill control products to contain the spill. 4. Treat any persons that may have come into contact with the fuel.	1. The Site Supervisor and Managing Director must be notified. 2. Material environmental harm may occur to soil, groundwater, or surface water, depending on the volume and location of the spill. Regulator/stakeholder notification is at the discretion of the Managing Director or their delegate.	1. If regulatory authorities were notified, immediately carry out any remediation actions for Council's stormwater system (off-Site or on Site) as directed by the regulator(s). 2. Engage a suitably qualified consultant to conduct surface water and soil monitoring, if required. Investigate any subsequent increases in pollutant levels, in consultation with the qualified water consultant. 3. If regulatory authorities were notified, submit follow up written report(s) as required.
	Major Spill (i.e. permeating hardstand, escaping bunded area, proximity to ignition sources or incompatible chemicals)	Regulator & Stakeholder notifiable incident	1. If possible, shut off or contain the source of the spill. 2. Take all steps to remove sources of ignition. 3. Lay down spill control products on hardstand surfaces (i.e., concrete or asphalt) to contain the spill. 4. Treat any persons that may have come into contact with the fuel.	1. The Site Supervisor and Managing Director must be notified. 2. A hydrocarbon spill that threatens surface water is likely to result in material environmental harm, particularly if the chemical enters an off-Site waterway. The Managing Director or their delegate must notify the regulator(s). 3. If the fuel enters the stormwater system or any other off-Site waterway, the Site Supervisor or Managing Director must also notify neighbours and other relevant stakeholders.	1. Immediately carry out any remediation actions for waterways (off-Site or on Site) as directed by the regulator(s); 2. Immediately engage a suitable contractor to repair the damage to the flammable storage tank or replace the tank if required (with a product that addresses the cause of the incident); 3. Engage a suitably qualified consultant to obtain soil samples to determine whether contamination of the land has occurred; 4. Review any relevant management plans or operational procedures regarding hydrocarbon handling, management and procurement and review this PIRMP. 5. Submit any required reports internally and to the appropriate regulatory authorities.
Chemicals	Minor spill (i.e. contained within bunded area)	Internally notifiable incident	1. If possible, shut off or contain the source of the spill. 2. If flammable, take all steps to remove sources of ignition. 3. Leave the area if it is an enclosed space and the chemical is likely to produce a hazardous vapour. 4. Contain the spill with spill kit products. 5. Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Site Supervisor or their delegate. 6. Treat any persons that may have come into contact with the chemical.	1. The Site Supervisor and Managing Director must be notified. 2. Material environmental harm may occur to soil, groundwater, or surface water, depending on the chemical type and location of the spill. Regulator notification is at the discretion of the Managing Director or their delegate.	1. If regulatory authorities were notified, carry out all required remediation actions. 2. Remove all the IBCs that came in contact with the spill and keep them in an isolated located away from ignition sources. 3. Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste. 4. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant. 5. If regulatory authorities were notified, submit follow up written report(s) as required.
	Major spill (i.e. permeating hardstand, escaping bunded area, proximity to ignition sources or incompatible chemicals)	Regulator & Stakeholder notifiable incident	1. If possible, shut off or contain the source of the spill. 2. If flammable, take all steps to remove sources of ignition. 3. Leave the area if it is an enclosed space and the chemical is likely to produce a hazardous vapour. 4. Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Site Supervisor or their delegate. 5. Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-Site escape of the spill). 6. If flammable, spray a mist of water over the spill. 7. Treat any persons that may have come into contact with the chemical.	1. The Site Supervisor and Managing Director must be notified. 2. A chemical spill that threatens surface water is likely to result in material environmental harm, particularly if the chemical enters an off-Site waterway. The Managing Director or their delegate must notify the regulator(s). 3. If the chemical enters stormwater system or any other off-Site waterway, the Managing Director or their delegate must also notify neighbours and other relevant stakeholders.	1. Immediately carry out any remediation actions for waterways (off-Site or on Site) as directed by the regulator(s). 2. Remove all the IBCs that came in contact with the spill and keep them in an isolated located away from ignition sources. 3. Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste. 4. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant. 5. Submit any required reports internally and to the appropriate regulatory authorities.
Gas Leak	Gas leak	Internally notifiable incident	1. Take any action required to stop the leak. 2. Take all steps to remove the sources of ignition. 3. Evacuate the Site at the discretion of the Site Supervisor. 4. Contact fire bridge by calling 000.	1. The Site Supervisor and Managing Director must be notified. 2. A gas leak poses a fire risk. Regulator/stakeholder notification is at the discretion of the Managing Director or their delegate.	1. If the gas leak has stopped and no longer poses a combustion risk, an investigation into the leak must be conducted. 2. Operations may resume once it is safe at the discretion of the Site Supervisor. 3. Review any relevant management plans or operational procedures regarding material management, fire management and review this PIRMP.
Surface water	Contaminated water overflow to Council's stormwater system	Regulator & Stakeholder notifiable incident	1. Take any action required to stop the source of the overflow. 2. Lay out any control measures such as bunding or geotextile fabrics over the drains. 3. Take actions to remove any IBCs or flammable liquids and gases that may come un contact with the contaminated water. 4. Treat/Clean any persons that may have come into contact with the contaminated water.	1. The Site Supervisor and Managing Director must be notified. 2. Contaminated water overflow to Council's stormwater system is likely to result in environmental harm. If any contaminated water enters stormwater system or any other off-Site waterway, the Managing Director or their delegate must also notify neighbours and other relevant stakeholders.	3. Immediately carry out any remediation actions for waterways (off-Site or on Site) as directed by the regulator(s). 4. Remove all the IBCs or machinery that came in contact with the overflow. 5. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant. 6. Submit any required reports internally and to the appropriate regulatory authorities.

Combustion	Fire	Regulator & Stakeholder notifiable incident	1. Immediately utilise the fire extinguishers present at the Site to control the fire. 2. If possible, remove any flammable materials that could further catch fire. 3. Take all steps to remove the sources of ignition. 4. Evacuate the Site at the discretion of the Site Supervisor. 5. Contact fire brigade by calling 000.	1. The Site Supervisor and Managing Director must be notified. 2. Uncontrolled fire is likely to result in material environmental harm to air, soil, groundwater, or surface water depending on the volume of fire. 3. The Managing Director or their delegate must notify the regulator(s) when controlled fire takes place even if no-one is injured. 4. The Managing Director or their delegate must also notify neighbours and other relevant stakeholders.	1. Immediately engage a suitable contractor to repair the damage to the affected area (with a product that addresses the cause of the incident). 2. Engage a suitably qualified consultant to obtain soil to determine whether contamination of the land has occurred. 3. Review any relevant management plans or operational procedures regarding waste management, fire management and procurement and review this PIRMP. 4. Submit any required reports to the appropriate regulatory authorities.
	Explosion	Regulator & Stakeholder notifiable incident	1. Immediately evacuate the Site according to Site Supervisor's instructions. 2. If possible, remove any flammable materials that could further catch fire. 3. Take all steps to remove the sources of ignition. 4. Contact fire brigade by calling 000.	1. The Site Supervisor and Managing Director must be notified. 2. Uncontrolled explosion likely to result in material environmental harm to air, soil, groundwater, or surface water depending on the volume of the explosion. 3. The Managing Director or their delegate must notify the regulator(s) when controlled fire takes place even if no-one is injured. 4. The Managing Director or their delegate must also notify neighbours and other relevant stakeholders.	1. Immediately engage a suitable contractor to repair the damage to the affected area (with a product that addresses the cause of the incident). 2. Engage a suitably qualified consultant to obtain soil samples to determine whether contamination of the land has occurred. 3. Review any relevant management plans or operational procedures regarding waste management, fire management and procurement and review this PIRMP. 4. Submit any required reports to the appropriate regulatory authorities.

2. Notification Details

2.1 Communication with Regulators and Management Authorities

There are several regulators and management authorities who may need to be notified in the event of a regulator-notifiable incident. These stakeholders are shown in the Table 2 below.

Table 2: Authority Contacts Requiring Notification During a Pollution Incident

Authority	Description	Contact information
Department of Planning, Housing and Infrastructure (DPHI)	State planning regulator	1300 305 695
NSW Environment Protection Authority (EPA)	Main environmental regulator for Sites with an EPL	131 555
Fairfield City Council	Local government environmental regulator	(02) 9725 0222
NSW Ministry of Health	Public health regulator	(02) 9391 9000
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

2.2 With Emergency Services and Senior Management

The Table 3 lists emergency services and senior management staff that may need to be contacted in the event of an incident.

Table 3: Contact Details for Persons and Organisations Relevant to Pollution Incident and Emergency Response

Contact	In case of...	Number
Anthony Alpen (Managing Director)	Any pollution incident	0419 616 224
Peta Mascall (Site Supervisor)	Any pollution incident	0409 464 542
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500
Greenway Medical Hub	Local medical clinic for treatment of minor injuries	(02) 9756 1567
Fairfield Hospital	Local hospital for serious (non-life-threatening) injuries	(02) 9616 8111
Fire and Rescue NSW Smithfield Fire Station	Assistance with fire or pollution incident response	(02) 9493 1041
Wetherhill Park Police Station	To report non time-critical crime, such as vandalism or illegal dumping	(02) 8788 5199
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234
Optus Operator-assisted directory services	For connection to key contacts and phone numbers	124937

2.3 Stakeholder Notifiable Incident

When it is necessary, neighbours and external stakeholders will be promptly notified of a pollution incident. The extent of notification will be at the discretion of the Managing Director and the company lawyers, unless otherwise directed by a relevant regulator or management authority. Table 4 below details relevant stakeholders and information pertinent to making a decision on whether notification is required.

Table 4: Notification Requirements for Stakeholders and Neighbours

Stakeholder	Likely to be affected by	Contact information/method
Nearest receivers	Harmful or nuisance emissions to surface water (off-Site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Immediate neighbours	Harmful or nuisance emissions to surface water (off-Site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Wider community/distant neighbours	Harmful emissions to surface water (off-Site), groundwater or air (that is likely to expand into the wider community).	Prompt letters drop.
Contractors or other internal stakeholders not on Site	Pollution events that result in the closure of the Site.	Various – phone call.
Business partners/investors	Pollution events that are likely to result in negative publicity for the business, regulatory action, or closure (permanent or temporary).	Various – phone call.