



Pollution Incident Response Management Plan

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Location: 6 Sleigh place, Wetherill Park, New South Wales

Version	Revision Description	Reviewed by	Endorsed by	Issue date	Comment
0.1	Initial	Tiaan Reader	John Benham	31/10/2022	
0.2	Review	Tiaan Reader	Lucy Milkeraitis	10/05/2023	

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Introduction

Mainstream Recycling is a wholly owned subsidiary of TDG Environmental (TDG) and currently operates a portfolio of recycling facilities located around Australia and New Zealand. The Facilities accept and treats material derived from Storm Water and GPT assets.

Recovered materials are then onforwarded in their separated fractions to other licenced facilities for beneficial re-use.

The Wetherill Park Facility is located at 6 Sleigh Place, Wetherill Park NSW 2164, within the Wetherill Park Industrial Estate. The total site is around 3,100 square metres (m²) in size and comprises Lot 78 of DP 845746. The site is zoned IN1 General Industrial under the Fairfield Local Environmental Plan (LEP) 2013.

The Facility is located about 430 metres south of Prospect Reservoir and about 200 metres east of Cowpasture Road. Surrounding land uses are typical of a commercial / industrial area and include warehouses, distribution, production and supporting services. Key land uses within the broader area include land uses for primary production / agricultural purposes.

Access to the site is from Sleigh Place which connects to Cowpasture Road to the west which allows access to the broader arterial road network including, The Horsley Park Drive, Elizabeth Drive and the M7 motorway

The site is relatively flat, having a slight slope from the rear of the site to the street boundary. The nearest residential area is located about 1,600 metres north of the site. The Facility comprises of the following elements:

- A building incorporating site offices and amenities.
- Car parking spaces for visitors (2) and staff (23)
- In-ground weighbridges with an electronic docketing system, at the entrance and exit to the operational area of the Facility
- A contained waste tipping floor, with dust and odour control
- A fully bunded processing hall with filters, settling tanks and water treatment system, screening, and separation where the waste is dewatered, mixed, adjusted with sawdust, and processed.
- A floor slab designed to capture all free liquids
- Containment areas to store and hold waste for treatment
- Liquid treatment units designed to comply with Sydney Water sewer discharge standards, and to achieve a water quality potentially suitable for off-site recycling (e.g., landscape irrigation, truck wash or wash- down water)
- Liquid holding tanks to store treated liquid ready for transport and recycling / reuse
- An activated carbon odour management system
- Discharge exhaust fans to produce negative ventilation.
- Dust suppression sprinkler system
- Fire protection infrastructure

1.1 Purpose

MAINSTREAM RECYCLING PTY LIMITED holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for facility located at 6 Sleigh place, Wetherill Park, New South Wales.

As per the Protection of the Environment Operations Act 1997 (the POEO Act), MAINSTREAM RECYCLING PTY LIMITED must prepare, keep, test, and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

1.2 Environment Protection Licence (EPL) details

Name of licensee: (including ABN)	MAINSTREAM RECYCLING PTY LIMITED ABN 75 611 996 493
EPL number:	20694
Premises name and address:	6 Sleigh place, Wetherill Park, New South Wales 2168
Company or business contact details	Name: Tiaan Reader Position or title: National Operations Manager Business hours contact number/s: 0433 684 447. After hours contact number/s: 1300 330 294. Email: info@mainstreamrecycling.com.au
Website address:	www.mainstreamrecycling.com.au
Scheduled activity/activities on EPL:	Waste processing (non-thermal treatment) Waste storage
Fee-based activity/activities on EPL:	Non-thermal treatment of liquid waste Waste storage - other types of waste

1.3 Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.	
PIRMP activation	Anyone on site can activate the PIRMP though notification and response are the responsibility of Management
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name of person responsible: Frank Dyer Position or title: Group General Manager SQE Business hours contact number/s: 0423 561 116. After hours contact number/s: 0423 561 116. Email: fdyer@tdg.com.au
Managing response to pollution incident	Name of person responsible: Tiaan Reader Position or title: National Operations Manager Business hours contact number/s: 0433 684 447 After hours contact number/s: 0433 684 447. Email: treader@mainstreamrecycling.com.au

1.4 Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.		
Fire and Rescue NSW / Rural Fire Service	Contact number/s:	000
Police NSW	Contact number/s:	000
EPA	Contact number/s:	131 555
NSW Health	Contact number/s:	1800 020 080
Fairfield Hospital	Contact number/s:	02 9616 8111
SafeWork NSW	Contact number/s:	131 050
Local authority/s: Fairfield City Council Gas – Jemena Integral Energy	Contact number/s:	02 9725 0222 131 909 131 003
Other organisation or agency: Fire and Rescue (without immediate threat) Sydney Water Transport for NSW NSW National Parks and Wildlife Service Poisons Information Centre	Contact number/s:	1300 729 579 132 092 131 700 1300 072 757 131 126

1.5 Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g., schools, preschools, hospitals, nursing homes):

- Rocktown
- Spot On Warehouse Solutions
- Sew-Euro drive.
- Rocket Industries

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g., door knock, phone call, emergency alert):

After consultation with the regulatory authorities, if required the Site Supervisor will undertake the early warning of the immediate neighbours in the first instance by phone, unless relieved by a more senior agent for the company. The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do.

For example:

- Due to an Excessive Dust on site, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.
- An accidental discharge occurred from the site. Emergency vehicles may possibly be present on roads leading to the terminal.

In the event where the site is evacuated as a result of an emergency, generally the NSW Police and Fire and Rescue NSW will take over the site to respond to the incident. For this instance, instructions for coordinating the evacuation of neighbouring residents would be directed by the relevant authorities.

1.6 Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

- Explosion / Fire
- Excessive air emission
- Groundwater contamination
- Spill or accident with wastewater or sewage
- Discharge of Sediment
- Vehicle accident

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood

Risk Matrix - Assessing and Controlling Risk

Permanent or long-term serious environmental harm / life threatening or long-term harm to health and wellbeing	Consequence	Severe	Medium	High	High	Extreme	Extreme
Serious environment harm / high level harm to health and wellbeing		Major	Medium	Medium	High	High	Extreme
Medium level of harm to health and wellbeing or the environment over an extended period of time		Moderate	Low	Medium	Medium	High	High
Low environmental impact / low potential for health and wellbeing impacts		Minor	Low	Low	Medium	Medium	High
No or minimal environmental impact, or no health and wellbeing impacts		Low	Low	Low	Low	Medium	Medium



	Rare	Unlikely	Possible	Likely	Certain
	Likelihood				
Could happen but probably never will	Not likely to happen in normal circumstances	May happen at some time	Expected to happen at some time	Expected to happen regularly under normal circumstances	

Explosion / Fire – (Likelihood – Low)

- Working in high fire danger periods
- Potential ignition sources include cigarettes and domestic rubbish (such as bottles), and the generation of sparks through pumps heating localised vegetation.
- Fuel leaks and spills from plant, pumps and the storage of fuel and aerosol cans, could also provide a fuel source for bushfires and explosions.

Excessive air emission - (Likelihood - Moderate)

- Poor operation of vehicle
- Infrequent vehicle inspection and maintenance regime
- Poor housekeeping of fuel / chemical storage areas
- Failure of or inadequate secondary containment (i.e., bunding failure)

Groundwater contamination - (Likelihood -Low)

- Plumbing failure within facility Tank overflow.

Spill or accident with wastewater - (Likelihood - Medium)

- Insufficient sized holding tanks
- Infrequent pump outs being undertaken.
- Spillage outside of dedicated receival pit

Discharge of Sediment - (Likelihood - Low)

- Poor operation of plant or vehicle
- Infrequent plant or vehicle inspection and maintenance regime
- Poor housekeeping of fuel / chemical storage areas

- Failure of or inadequate secondary containment (i.e., bunding failure)
- Not adhering to spill response requirements and Hazardous and Contaminated Materials Management Plan

Vehicle accident - (Likelihood - Moderate)

- Drive to fast
- Drive steep incline.
- Other drivers make error.

1.7 Pre-emptive actions to be taken.

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

Explosion / Fire

- General purpose fire extinguishers and fire extinguishers suitable for oil/fuel fires will be available in all offices, plant, and vehicles.
- Personnel on site will be familiar with the use of fire-fighting equipment.
- Fire-fighting equipment will be maintained regularly.
- Fire detection systems will be in place and regularly inspected with each compound building.

Excessive air emission

- .
- Ensure all machinery and vehicles meet relevant emissions standards. Any vehicles or machinery non-compliant with standards or producing excessive (visual assessment) emissions to be disused immediately.
- Fully contained indoor facility

Groundwater contamination

- Regular bunding and holding tank maintenance checks
- Well maintained site
- Maintain mobile plant service and daily prestart.

Spill or accident with wastewater or sewage

- Volumes of hazardous substances onsite minimised as far as practicable.
- Spill kits will be kept on site and near all plant plant.
- Hazardous and dangerous substances including all fuels, oils, lubricants, and chemicals brought onto the site will only to be handled or stored within designated bunded areas or other suitable locations to ensure retention of any spills or leaks.
- All appropriate Safety Data Sheets will be kept on site and will be readily accessible.

Discharge of Sediment

- All waste would be managed in accordance with the Waste Management Plan
- Liquid wastes are to be stored in appropriate containers in bunded areas until it can be transported off-site for disposal at a licenced facility.
- Effluent tanks to be fitted with visual and/or audio alarms to prevent tank overflows.

Vehicle accident

- Drive to speed limit
- Monitor driving.
- Obey road signs.
- Drive to condition

1.8 Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Location/tank	Max. quantity	Contents	Comments
Tank 1	40,000kg	Wastewater	Located in the rear lefthand side of the building
Tank 2	10,000kg	Wastewater	Located in the rear righthand side of the building
Tank 3	60,000kg	Wastewater	Located in the rear righthand side of the building
Tank 4	60,000kg	Waste	Located in the rear righthand side of the building
Stockpile 1	150m ³	Unprocessed Waste	Located left hand side of the building/Incoming
Stockpile 2	130m ³	Processed Waste	Outgoing/Treated
Stockpile 3	100m ³	Storage	Outgoing/Treated
Stockpile 4	150m ³	Storage	Outgoing/Treated
Stockpile 5	130m ³	Storage	Outgoing/Treated
Pit 1	30m ³	Storage	Incoming
Pit 2	30m ³	Storage	Incoming
Pit 3	50m ³	Storage	Incoming
Portable fuel pod	650L	Fuel	Various
Lubricants	50L	Various	Various, banded and segregated

1.9 Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

- SDS Register - Electronic/Black Folder located in vehicles.
- Spill Kits - Each vehicle, located around site including beside both entry and exit gates.
- Fire equipment - Located in each vehicle and around site.
- Emergency Evacuation Drills - undertake annually.
- Personal Protective Equipment - Gloves, boots, glasses, dust masks, hearing protection, and hi vis clothing
- First Aid Kist - Located in each vehicle and around site.

1.10 Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried out:

The following notification methodology is proposed to be utilised as required:

- Early warnings, the same day telephone notification to whom may be affected by the incident over the subsequent 24-hour period.
- Follow up phone calls to all neighbours who may have been notified by the initial early warning.
- Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, Community Consultative Committee meetings, Mainstream website, media statements or any other strategy as defined by senior management.

Develop any specific information that could be provided to the community, so it can minimise the risk of harm:

Information provided will be relevant to the incident and may include the following details:

- Type of incident that has occurred.
- Potential impacts local landholders and the community.
- Site contact details; and
- Advice or recommendations based on the incident type and scale.

1.11 Minimising harm to persons on the premises

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

Entry to Mainstream Recycling facilities are granted only after a site specific induction to address minimum PPE requirements, it's emergency protocols, exits and assembly points in case of an incident.

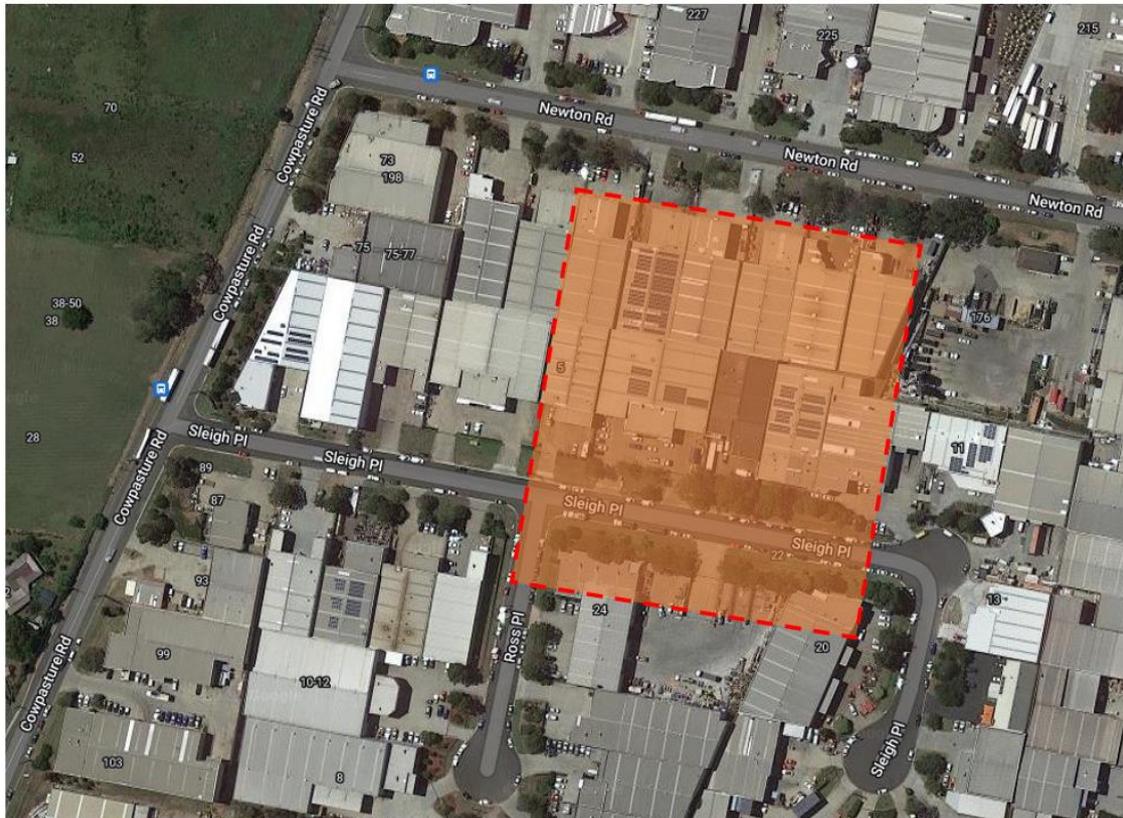
Following site induction, relevant permits are issued depending on scope of works, these include works deemed to be of higher risk and are issued by a member of staff trained to assess the risks associated with this task and monitor its progress. Any risk control measures are then tabled, tool boxed and implemented at the workplace or project. No work is to commence until all direct or potential hazards have been controlled and the workplace is deemed safe.

1.12 Maps

Location of the Mainstream Recycling – 6 Sleigh place, Wetherill Park to which the licence relates:

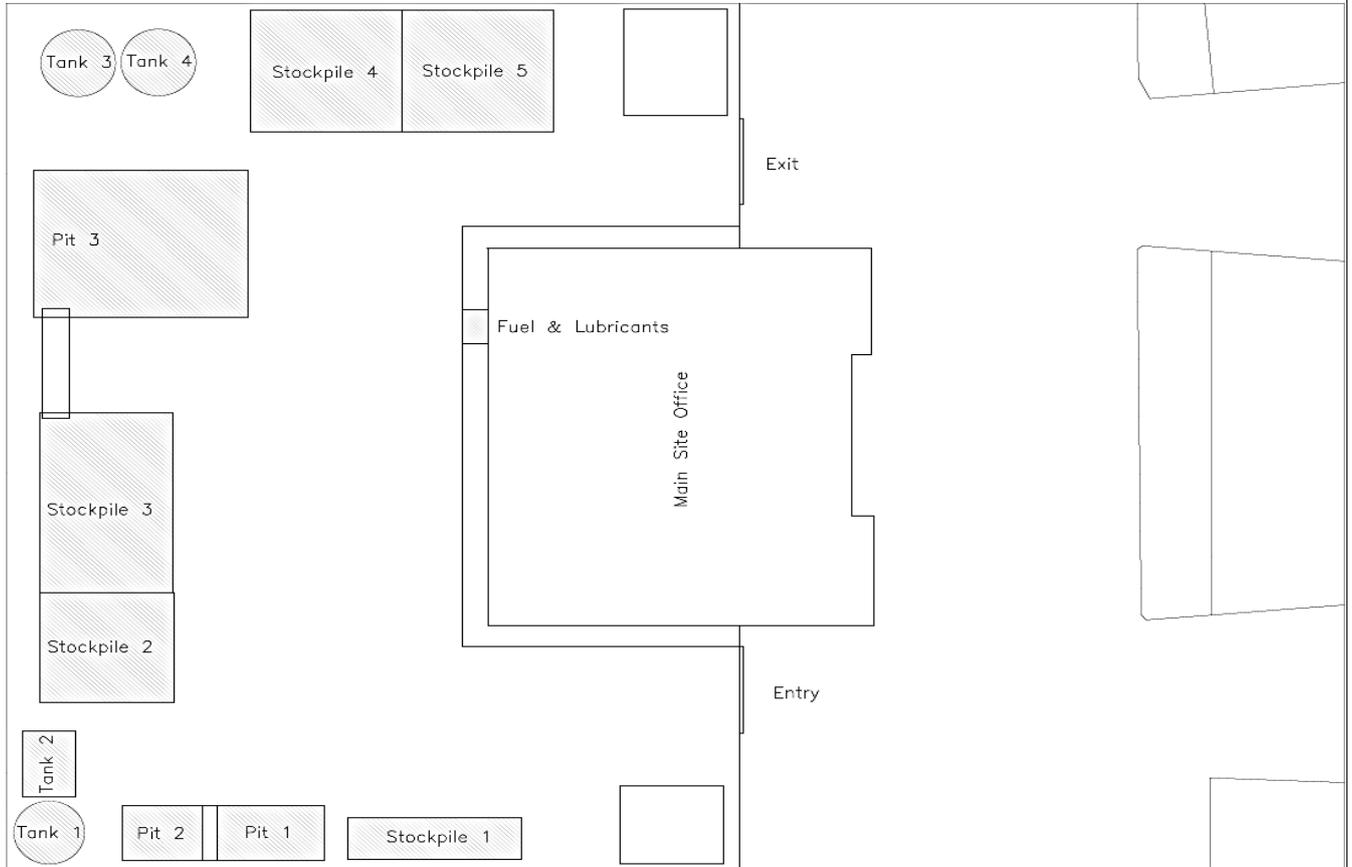


Surrounding area likely to be affected by a pollution incident:



Location of potential pollutants on the premises:

As Hatched



Location of any stormwater drains on the premises.:

It is recommended the position of any discharge points, or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g., the nearest water course or water body that stormwater drains located on the premises discharge to).

None. The site is self-contained and any discharge is done via Trade Waste via agreement with relevant water authority.

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

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates, and actions to be taken during and after an incident:

- Assessing the situation
- Isolate /secure the incident.
- Notify emergency services.
- Communicate with other near by
- Control movement around the site
- Use spill kit and contain spill.
- Communicate with neighbours

Develop a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates, and the action to be taken during or immediately after a pollution incident to reduce that risk:

In order to effectively plan for a potential pollution event, a register of environmental hazards has been created. Each hazard has been assessed in accordance with Mainstream Recycling's Work Health & Safety Management Plan (PLA-TDG-007-01).

An initial worksite WHS Hazard Identification and Risk Assessment is carried out by the working team and documented before works commence. The risk control measures are then tabled, tool boxed and implemented at the workplace or project. No work is to commence until all direct or potential hazards have been controlled and the workplace is deemed safe.

In the event that a pollution incident has occurred that has the potential to impact human health, consultation and investigation by management will follow immediately after this incident.

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

Following a pollution incident, remediation works will occur immediately or as soon as reasonably practicable.

This works will be completed by appropriated licensed and trained personnel or contractors.

Mainstream Recycling will ensure sufficient insurances are sought to cover significant costs which might be incurred during a remediation event.

1.14 Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

Mainstream Recycling will notify all appropriate regulatory authorities following a notifiable incident as outlined in Section 1.4. Mainstream Recycling will coordinate with the person managing the response to the pollution incident during and after the incident. .

Identify the person/s through whom all communications are to be made:

Notification of the incident to relevant authorities is to be made by the person nominated in section 1.3 of this PIRMP or a person with an appropriate level of authority within the company, this can be either a director or manger within the company

1.15 Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

All Mainstream employees and contractors working on site undergo site specific induction training. The induction includes: Waste Management Awareness, Awareness of the PIRMP, Locations of the plan and all other relevant policies Procedures and SDS', Spill Response Actions and Kit Locations, site specific evacuation protocols and assembly points.

Further to this, Mainstream Recycling incorporates a regimented training program for staff with specific duties.

1.16 Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Detail how the testing is documented and recorded (this must include the testing dates and names of all staff members who carried out the testing):

The plan is tested as required as policies or site-specific parameter change. The plan documented in physical form, uploaded to internal intranet, distributed throughout the company, and uploaded as public record via Mainstream Recycling's website.

Detail the dates on which the plan was updated:

- Wednesday March 22nd, 2023

1.16.1 PIRMP testing details.

Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
06.04.23	Tiaan Reader National Operations Manager	Desktop simulation – lubricant spill	No issues identified. - update of staff responsibilities, qualifications	06.04.24

1.16.2 PIRMP update details.

Date update occurred	Reason for update	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
31.10.22	Update company structure following acquisition	Contact details, map, staff responsibilities updated.	TBA	11.11.22
22.03.23	Update following review of relating policies and procedures	Update Operations Management Plan and Site management details	TBA	01-05-23