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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

For *Sell & Parker, Kings Park*
EPL 11555

Contents

1 OVERVIEW

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009.*

Environment Protection Licence 11555, section O4.1, "the licensee must develop, implement, maintain and test a Pollution Incident Response Management Plan (PIRMP) in accordance with the requirements under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) and its regulations"

Under the legislation referred to above, the PIRMP is to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

1. **Background** –describes main features of the regulation
2. **Hazard, likelihood and pre-emptive actions to prevent pollution incident risks –** describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
3. **Maps –** map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures –** what to do in case of material harm
5. **Early warnings and communication to neighbours –**when to contact neighbours in case of pollution incidents and info required for website
6. **Training –**information to be passed on to staff and contractors
7. **Updating of plan –**frequency of updates
8. **Testing –** frequency of drills to test effectiveness of PIRMP
9. **Implementing of plan –** reference to legislation requirement to carry out aspects of the plan during a pollution incident

Introduction
The Sell & Parker, Kings Park site is licensed to undertake works and activities which comply with the licence.

This site is covered by an Environment Protection Licence (EPL) number 11555 for the scheduled activities relating to metallurgical Scrap Metal Processing at a scale of >100,000 – 500,000 T being the annual production capacity.

The site has an overarching environmental management system supported by our environmental management plans which were approved by the Department of Planning, Industry and Environment on 8 October 2019.

Purpose

The purpose of this PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community and to the appropriate regulatory authorities.

The purpose of this plan is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility 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 plan 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.

Scope

This PIRMP is for the use of all Sell & Parker Kings Park staff and contractors undertaking works at the Sell & Parker Kings Park facility. The PIRMP is to be implemented if there is a threat of potential for material harm or material harm to human health or the environment or both.

The Sell & Parker site is located at 23-43 & 45 Tattersall Road, Kings Park NSW 2148, Lot 5 DP 7086, Lot 2 DP 550522 and holds EPL number 11555. The Group Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate changes in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of Sell &Parker staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2009.

Scale

This PIRMP is based on the definition of Material Harm to the environment under POEO Act 1997:

> ***147 Meaning of material harm to the environment***
> *(1) For the purposes of this Part:*
> *(a) harm to the environment is material if:*
> *(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
> *(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and*
> *(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment*.

Responsibilities

<u>All Sell & Parker staff and contractors and visitors</u>

- Reporting incidents
- Implementing PIRMP as required
- Notifying supervisor or manager when incident has occurred
- Completing an incident report after the incident has been dealt with

<u>Supervisors and Managers</u>

- Ensuring their staff are aware of PIRMP
- Training of staff
- Reporting to the Group Environmental Manager or Senior staff if an incident occurs

<u>Group Environmental Manager, Directors and Contracts Manager</u>

- assisting with advice, reporting and response process;
- ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act

- giving advice on whether environmental incidents need to be reported to external agencies
- assisting in the notification of pollution incidents to the relevant authorities
- provision of maps associated with the plan
- assistance with the implementation of response actions to pollution incidents
- assistance in communicating with neighbours and the local community about the Plan and when incidents of a certain nature occur
- ensuring that training for the responsibility for activating their roles in the Plan is undertaken
- testing; and
- reviewing this plan.

Legal Branch is responsible for:

- providing legal advice,
- assisting with investigations of pollution incidents and preparation of reports for the Environment Protection Authority and other regulators for major incidents and
- ensuring legal compliance of the Plan.
- reviewing this plan

Documentation

The environmental incident register is with the Vault Health, Safety and Risk Management Software program used to record and monitor all environmental incidents within Sell & Parker. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the Group Safety Manager.

The Group Environment Manager is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

Additional Information

Contact: Howard Richard, Group Environmental Manager, 02 9621 2633

Effective date: 20 March 2019

Review date: January 2025

2 EVALUATION

This Pollution incident Response management Plan (the Plan) complies with the requirements under the:

- *POEO Act 1997* Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans
- *POEO (General) Regulation 2009 Part 3A*

The requirements under the legislation are supported by the *Environmental Guidelines: Preparation of pollution incident response management plans*, which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licenses (EPLs). The Sell & Parker Kings Park operates under EPL Nr. 11555 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas which this Plan covers are described in table 1 PIRMP Requirements.

TABLE 1

PIRMP Legislation covered under this Plan		Reference
POEO Act Part 5.7		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	5 + references
153D	Keeping of plan:	6.3
153E	Testing of plan:	9
153F	Implementation of plan:	10
POEO (General) Regulation 2009		
98C(a)	Hazard assessment:	3.4 +appendix 1
98C(b)	Likelihood assessment:	3.4 + appendix 1
98C(c)	Pre-Emptive Action:	3.4 + appendix 1
98C(d)	Pollutant Inventory Types:	3.4 + appendix 1
98C(e)	Pollutant Inventory Quantities:	3.4 + appendix 1
98C(f)	Safety Equipment:	3.4 + appendix 1
98C(g)	Staff Contacts:	5.1.1
98C(h)	Authority Contact:	5.1.4 + 6.2 + references
98C(i)	Early Warnings Neighbours:	3.4 & 6
98C(j)	Staff Safety:	3.4
98C(k)	Maps location of pollutants:	3.4 and 4
98C(l)	Early Warnings General:	3.4 and 6

98C(m)	Training of Staff:	7
98C(n)	Timing of Testing:	9
98C(o)	Updating of Plan:	8
98C(p)	Plan Testing:	9
98D(1)	Availability of plan:	6.3
98D(2)	Publishing Plan Parts:	6.2 + 6.3
98D(3)	Procedures under Act:	5 + references
98D(4)	Privacy Protection:	6.3
98E(1)	Testing of the Plan:	9
98E(2)	Minimum Testing requirements:	9

3 HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

3.1 Overview

This section deals with the POEO (General) Regulation 2009's sections 98(a) to 98(f) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The Sell & Parker Kings Park site undertakes "Metallurgical activities and Waste storage" as part of their "Scrap metal processing".

This Plan also considers areas of pollution concern, air (particulate), water (ground and surface), land, noise and odour (gas) pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in Sell & Parker Kings Park such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals, use and running of the Shredder and Pre-shredder, shearing, general daily activities whilst in a scrap metal yard. These modules are common across Sell & Parker operations, but include site specific issues for each Plan. They are based on the EMS.

The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under the Damstra (Vault) Health, Safety and Risk Management Software program

Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.

3.2 Summary of Pollution Types

The activity of Scrap Metal Processing and use of the shredder by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for Sell & Parker Kings Park.

Table 2: List of Typical Main Pollutants in Scrap Metal Processing

Description	Comments
Air Based Emissions	
Fugitive emissions	From the Shredder, Pre- Shredder and unloading of trucks. Dust is covered under this Plan and also found in Air Quality Management Plan.
Fire	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under Emergency Response Procedure WHS-SPR-PRO-018.
Substance	Gaseous emissions from the site, which are not part of the licence conditions and which represent an air impurity may, if of a scale of release, cause a pollution incident.

Noise	Emitted by plant and equipment. Covered in the Noise Management. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour is generally not associated with this site. Odour incidents, unless significant, are not considered to be material environmental harm, but are included in the PIRMP for consistency.
Spill type emissions	
Class 3 flammable liquids e.g. Fuels including petrol based fuels and	For plant and equipment operations. Covered under: • General Fuel Spill response
Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations. Covered under • General Fuel Spill response
Other dangerous Goods classes e.g. • Compressed gases • Corrosive substances • Oxidizing substances • Toxics • Other dangerous goods	Use of other dangerous goods varies on site. Covered under • Substance Management Procedure WHS-SPR-PRO-005 • WHS Management Plan WHS-SPR-PLN-001
Paints, inks and surface coatings	Surface coatings are applied on site. Covered under • Substance Management Procedure WHS-SPR-PRO-005
Pesticides	Control of weeds and pests: Covered under • Substance Management Procedure WHS-SPR-PRO-005
Other chemicals	For plant and equipment operations. Covered under • Substance Management Procedure WHS-SPR-PRO-005
Aqueous wastes, wastewaters and aqueous potential pollutants	Management of water and stormwater. Covered under: • Stormwater Management Concept plan- ERM • Water Management Plan
Wastes	Storage of wastes and wastes containing chemicals: Covered under: • Waste Monitoring Management Plan • Stockpile Management Plan

3.2.1 Use and Storage of Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous Chemicals — covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances

Hazardous chemicals are documented and itemized in accordance to the Workplace Health and Safety Regulation 2011. The specific hazardous and non-hazardous chemicals documents are identified in Table 3:

Table 3 Reference Documents to Inventory of Pollutants

Document Name	Relation to this Plan
Emergency Response Plan WHS-SPR-PLN-008	Provides: • Regular review for emergency preparedness • Evacuation procedure • Emergency procedures • That medical assistance is provided
Emergency Information box	• Emergency Management Plan • SDS list • Specific emergency response plans • Site plans

3.3 Risk assessment and Control Measures (pre-emptive actions)

3.3.1 Identification of Risk Areas

Assessment analysis and control measures to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents:

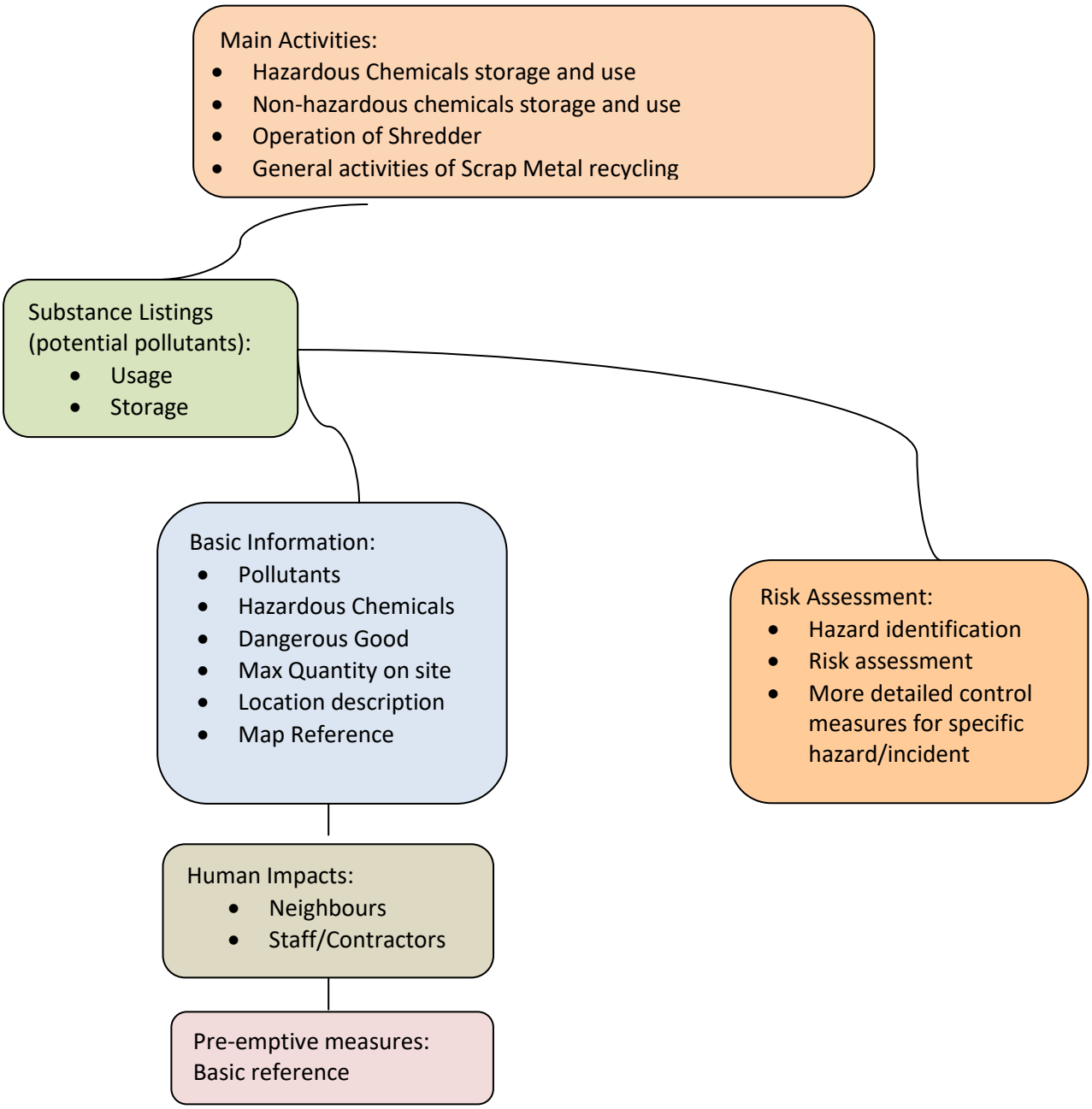
- EMS Blacktown Environment Management Plan
- WHS Management Plan WHS-SPR-PLN-001
- Emergency Services information
- Temporary Chemical Storage Locations

Table 4 List of Documents Covering Environmental Risk Assessment and Control Measures

Document Name	Relation to this Plan
WHS Management Plan WHS-SPR-PLN-001	Provides: • Key contacts regarding WHS issues and incidents • Hazardous chemicals register • Storage and handling requirements • Plant maintenance records • Emergency procedures • Training and record keeping • Handling of hazardous materials and dangerous goods
EMS Blacktown Site Environment Management Plan	Provides in relation to PIRMP requirements: • Internal auditing of sites and requires Sell & Parker site~~s~~ to undertake or implement: • Aspects and Impacts assessment • Construction activities • Maintenance activities • Facility management • Emergency response and incident response • Staff training and competencies
Emergency Response and Emergency Risk Plans	• Main emergencies • Emergency contact • Emergency management • Emergency procedures • Incident management • Safety and first aid requirements
Procedures, fact sheets and guides relating to PIRMP requirements	• Dangerous Goods • Incident Management • Waste disposal requirements • Emergency Management • Noise management • Stormwater Management Concept Plan ERM • Air Quality Management • Land Management • Waste Management • Water management • Battery Risk Assessment

3.4 Risk Modules

To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation 2009 are covered in this section. This is undertaken by a process described in the following flowchart:



In Appendix 1 Risk Assessment, each of the activities has their polluting substances listed. Each polluting substance is assessed for the requirements described in the flowchart above.

Table 5 provides a breakdown of the coverage of the regulatory requirements in the modules according to the POEO (General) Regulation 2009 by section part.

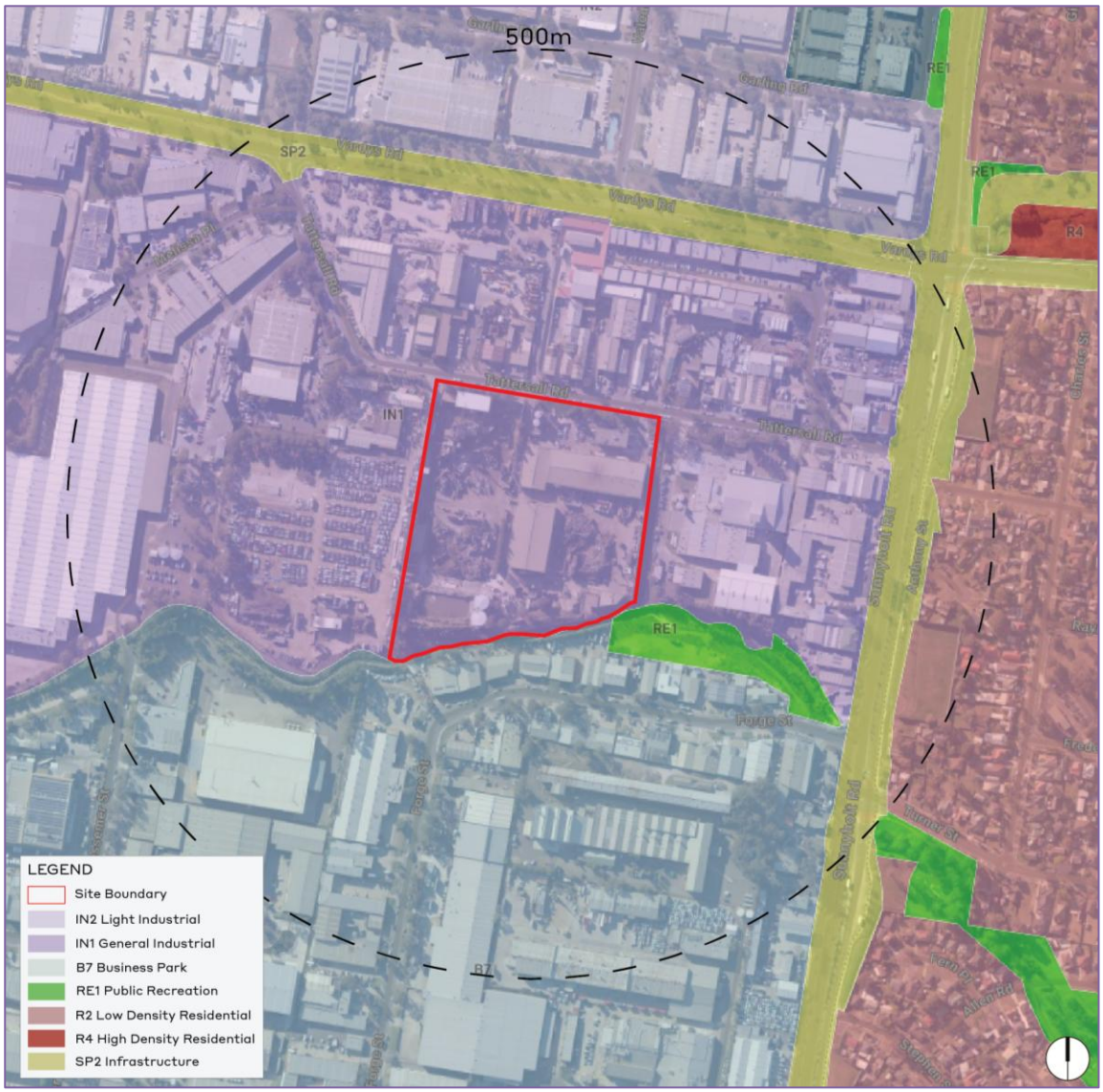
Table 5: Risk Module Coverage of the POEO (General) Regulation 2009

Section	Item heading	Covered by
98C(a)	Hazard assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(b)	Likelihood assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(c)	Pre-Emptive Action:	Hazard and Likelihood Risk assessment and Corrective Control Measures – Control measures and corrective action
98C(d)	Pollutant Inventory Types:	List of Polluting Substance Storages/Uses at Site Initial Assessment – Name/description, Covered under Hazardous Chemicals
98C(e)	Pollutant Inventory Quantities:	List of Polluting Substance Storages/Uses at Site Initial Assessment – Amount Stored (maximum or estimated Maximums stored)
98C(f)	Safety Equipment:	List of Polluting Substance Storages/Uses at Site Initial Assessment- Ref to Safety Coverage
98C(i)	Early Warnings Neighbours:	List of Polluting Substance Storages/Uses at Site Initial Assessment – Need for early warnings to neighbours
98C(j)	Staff Safety:	List of Polluting Substance Storages/Uses at Site Initial Assessment – Ref to Safety Coverage
98C(k)	Maps location of pollutants:	List of Polluting Substance Storages/Uses at Site Initial Assessment Location of Storage, Map reference (supports section 4 Maps)

4 MAPS

This section covers the *POEO (General) Regulation s98E(k)* requirements which are:

A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.



Map shows the geographic location of the Sell & Parker Kings Park and includes the requirements above.

The only stormwater drains are in the front carpark.

Map shows the location of potentially affected neighbours

5 EMERGENCY INCIDENT RESPONSE PROCEDURES

5.1.1 Internal communications — key names and contacts

Internal Communications are outlined in the following documents:

- Emergency Response Plan
- Emergency Management Plan
- Emergency Incident box

Table: List of Key Jobs and 24 hour Contact Details

Job title	Name	Contact Number
Director	Luke Parker	0419 224 795
Director	Morgan Parker	0409 363 082
WHS Manager	Ben Haack	0409 041 343
Environmental Manager	Howard Richards	0419 277 431
Contracts Manager	Craig Ley	0417 277 677
Operations Manager	Brad Scobie	0416 464 023
Group Operations Manager	Jordan Binskin	0427 830 199
General Counsel	Neil Sher	0405 828 772

5.1.2 Action to be Taken Immediately after a Pollution Incident by License Holder and Occupier of the Premises

This Pollution Incident Response Management Plan must be followed immediately after a Material Harm pollution incident occurs.

Also follow:

- Emergency Management Plan
- Emergency Response Procedure WHS-SPR-PRO-018

5.1.3 Procedures to be followed by the Responsible Person notifying the Pollution Incident

Section R3.3 of the of the Sell & Parker EPL provides the details the reporting requirements to the EPA when there is an environmental incident that threatens material harm.

The incident needs to reported to the EPA as soon as reasonably practicable as per section R2 of the Sell & Parker EPL, by telephoning the Environment Line on 131 555.

The EPA will want to know

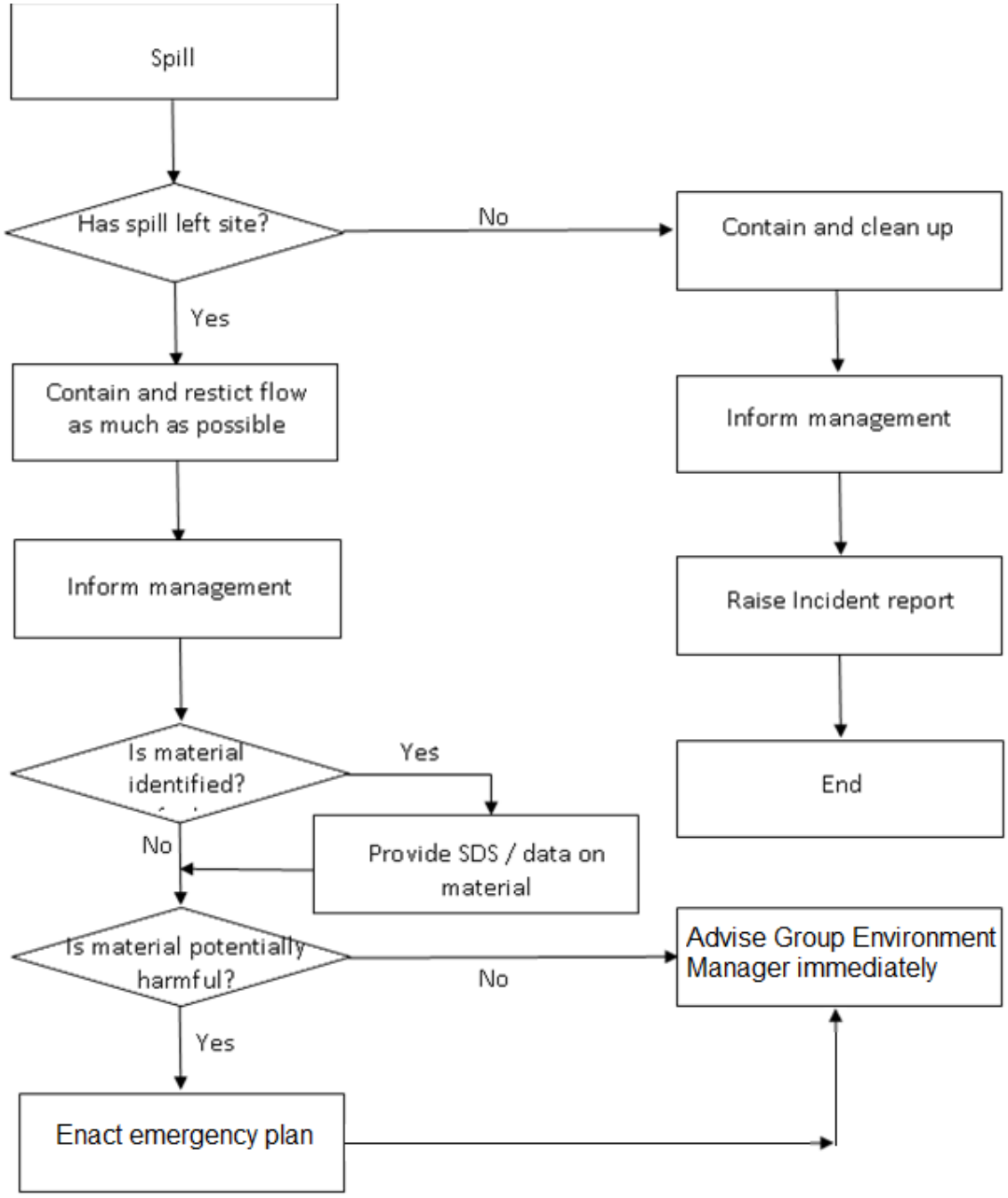
- The location of the event
- The approximate time the incident may have occurred
- The type of event (spill, fire, explosion etc)
- Type of substance involved – waste, plastic, fuel etc
- What, if any other emergency services have been informed

5.1.4 Procedures to be followed for coordinating with the Authorities or Persons

This is covered under

- See section 5.4

5.2 Procedure to be followed for Combating the Pollution Caused by a Spill Incident



For incidents involving material harm, the fire brigade or Hazmat would combat the pollution caused by a spill incident and become the emergency controller.

Pollution incidents – Spills

A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.)

The POEO Act definition of a **pollution incident** is:

Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Clean-up Action

All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently.

POEO Act definition of **"clean-up action"**, in relation to a pollution incident, includes:

(a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
(b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
(c) preparing and carrying out a remedial plan of action.
It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

Spill Kits

Spill kits include a range of products and materials used to contain and absorb liquids. Some kits are designed for use on impervious surfaces (e.g. bitumen, asphalt or concrete) whilst others are designed to contain and absorb liquids (mostly fuels and oils) in waterways. Spills onto bare or loose soil surfaces can usually be managed without having to use a spill kit.

Spill kits used by staff would commonly be “General Purpose” or “Hydrocarbon” type spill kits and would be capable of containing a spill of 80–90 litres. Special-purpose spill kits are also available for paints, solvents, acids and caustic or corrosive substances.

Further details can be found in the Emergency Incident box.

Spill kit management

Spill kits are available in areas where hazardous substances are used/stored and should be easily accessible. There is a specific spill kits for fuel leaks in the black iron tipping area.

Safety Gear

Use appropriate PPE before getting in close proximity to a chemical spill. PPE types to be used are identified on the SDS.

For aqueous based spills, such as dam waters and materials from sediment basins or floods, general safety gear for site will be suitable.

Further details of safety issues regarding incidents is under the Sell & Parker Work Health & Safety Policy Series: Clothing & Protective Equipment Policy.

Location of information

The Pollution Incident Response Management Plan will be located with other emergency documentation in the Emergency Information box. A hard copy of the PIRMP is also be kept with the Environment Protection Licence, is available in the Environment Managers office, and is on the Sell & Parker website.

Use either site plans or visual inspection to identify stormwater or creeks and other sensitive environmental areas.

Incident Action Hierarchy for Liquid and Flowable Solid Spills

This action should only be followed if there is no procedure or other requirement to follow in dealing with a spill type incident. For example, oil or fuel spills would be followed. The main site emergency plan should also be followed where applicable.

It or its alternative should be implemented in conjunction with the Emergency Response Plan.

When a spill occurs, it is the duty of the employee/contractor who notices or creates the spill to:

- Raise the alarm that an incident has occurred
- If you are the Emergency Controller take over command of the clean-up unless replaced (see section 4.7)
- If not the Emergency Controller then follow their instructions
- Invoke the following actions in the following table.

Incidents from liquids and flowable solids – generic procedure – use when site specific procedure does not exist		
Main Action	**Detailed Actions**	**Comments / information**
Safety Check	Ensure personal safety - Occupational Health & Safety rules apply at all times. Refer to the SDS for correct PPE or use standard PPE for the site for non-hazardous materials e.g. waters and muddy waters	Do not put yourself or any other person in danger when containing or cleaning up a spill. This is to prevent harm to humans. If anyone is injured or requires rescue they must be attended to first
	If the material leaking is a flammable liquid ensure that ignitions sources are isolated or removed from the area.	Typical examples are paints and thinners used for maintenance or other purposes.
	If the material is on fire or undergoing a dangerous reaction, invoke firefighting procedures.	Refer to Scrap Metal Fire Emergency
	Reporting requirements: Major incidents must be immediately reported.	This is covered in Incident Notification
Stop the leak	Do not allow any material down Stormwater drains	Other than the front car park the site is enclosed without discharge points to waterways.
	Where safe to do so minimise further leakage by turning off valves or the machine, plugging leaks with bungs etc.	Stopping the leak or source of the pollution will minimise its impacts
	Do not flush stormwater drains with water unless authorised by the controlling agency e.g. Fire Brigade or EPA	Further runoff from the site will cause additional pollution. Only the EPA and Fire Brigades can make this decision.
	If the leak or spilt material is likely to go off-site and the incident is of such a scale consider notifying neighbours which may be affected.	This is covered in the Emergency Response Plan
Contain the leak	Contain material to the smallest area practicable.	Limiting the spread of the material will minimise harm to the environment
	Depending on the size of the spill: Quick construction of barriers or floc mounds, bunds and dams, sandbags and spill kits socks/pillows or absorbent materials to minimise spread of liquids and flowable solids	For large spills consider use of earthmoving equipment to quickly construct bunds and dams downstream to contain the spill. Smaller spills use spill kits. Note use socks/pillows to absorb oils on water surfaces.
	Take into account the topography of the site to plan location of barriers and dams to prevent spreading of the spill.	Refer to the plan of stormwater drains/drainage topography to locate water courses
	Prevent it from spreading any further by using the sausages (from the spill kit) to form a bund on the ground. Tie as many sausages together as needed to create a continuous barrier	On non-impervious surfaces use spill kit socks (or sandbags or similar) to form a bund downhill from the spill to stop it spreading; place spill kit pillows under leaks; broadcast absorbent material over the spill and work towards the centre of the spilled material with a stiff bristle broom.

Clean up	Clean up the spill Follow the method in the SDS	This may involve organising the pump out of liquids by a waste contractor or transfer of liquids into drums or elsewhere.
	Mop up the spill with the Pads (from the spill kit) or spread liquid absorbent material over the spill.	Spill kits should be used in combination. Place contaminated spill kit materials in a suitable bin or drum (e.g. 200l)
	Shovel up or excavate contaminated soil	Place in a suitable drum/s or if large volume a special bunded stockpile
	Spills on water: Deploy boom on downstream side of spill. Consider wind direction and current or tidal flows. Slowly pull the boom around the spill and then draw it back into a small area.	Position hydrophobic absorbent pads or hydrophobic granular material over the surface of the spill contained by the floating boom.
Waste management	For small spills: Place contaminated booms and pads in a 200 L drum or similar container and remove from site to an authorized waste disposal facility.	Waste fuels are stored in fuel tank ready for collection. Waste oils are stored in the oil store in preparation for collection. All other spill materials will be sent off site for appropriate treatment.
	Containers and drums which contain spilt materials to be stored temporarily until collected for waste disposal	Storage of waste drums may require bunds or other spill capture systems
	Use cleaning agents to properly clean hard surfaces and drains if necessary. Excavate any contaminated soil and treat and or dispose of properly	Clean all hard and porous surfaces including drains. A high pressure cleaning and wastewater collection and management are likely options. Excavate any contaminated soil and treat and or dispose of properly.
Report	Complete an Environmental Incident Report as per Incident Reporting and Investigation WHS-SPR-PRO-011.	Prepare and submit incident report for the EPA if a Material Harm incident as per s101, POEO (General) Regulation 2009 occurs, as per condition R3 of the EPL.
	Forward to the Group Environment Manager who will receive the incident notification and process it accordingly.	This will depend on internal requirements and procedures.

5.3 Procedure to be followed Following an Air Incident

Pollution incidents – Air Emissions

An air emission can include, smoke, dust, odour or emission of a chemical or air impurity.

This action should only be followed if there is no procedure or other requirement to follow in dealing with an air emission type incident.

It or its alternative should be implemented in conjunction with procedures BT-OPS-PRO-ODR (odours), BT-ENV-PRO-DMM (dust) and BT-OPS-PRO-OXY (oxy-cutting).

Incidents from Air Based Emissions - generic procedure – use when site specific procedure does not exist		
Emission	**Action**	**Comments / Information**
Fugitive emissions	Stay on top of the sources and on top of cleaning and wetting regimes to prevent fugitive emissions. This will require more effort in the hotter and windier times of the year. In the unlikely event dust is of such a scale it will impact on neighbour's health or represents a risk to neighbours, consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice.	Generally observable or complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours. Sweep roadways and wet down stockpiles and fugitive emission points.
Fire	Depends on size and type of fire. Follow emergency plan for fires. If smoke causes a minor health risk to neighbours consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice. Co-ordinate with combat agencies to inform neighbours if a larger scale health risk.	Smoke is the main air emission of concern. Complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours. Large fires threatening homes and property may trigger evacuation procedures with neighbours In the event of a fire act quickly to isolate it and extinguish it. Follow specific site procedures for fire management
Substance	Depends on the type of substance, its health impacts, toxicology and its scale of emission. For small scale emissions consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice. Co-ordinate with combat agencies to inform neighbours if a larger scale health risk.	Known release of an air emission likely to cause a health risk of neighbours. Complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours.
Odour	Odour is difficult to quantify. Neighbours who identify themselves when lodging a complaint will be followed up by the responsible site manager or nominee.	Complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours. If due to stockpile, spray the affected area with deodoriser while looking for the odour source.
Noise	BT-ENV-PRO-NVE noise exceedance procedure covers noise management. Neighbours who identify themselves when lodging a complaint will	Note: noise is not a pollution Incident under the POEO Act.

	be followed up by the responsible site manager or nominee.	Noise is monitored and Air blast Overpressure Monitoring that breaches our license is published on our website.

5.4 External communications – government agencies and other parties

You must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

EPA	131 555			
Blacktown Council	9839 6000	Work Hours	1300 133 491	After Hours
SafeWork NSW	131 050			
Fire and Rescue NSW	1300 729 579			
NSW Ministry of Health	9840 3603	Work Hours	9845 5555	After Hours
Dept. Planning & Environment	In writing via the Major Projects website			

You must provide written details of the notification to the EPA and DPE within 7 days of the date on which the incident occurred.

Complaints from the Sell & Parker environment hotline must be reported to the EPA.

5.4.1 Co-coordinating, with the authorities

POEO Act s153C States in relation to the contents of a PIRMP:

> *(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.*

This action should only be followed if there is no procedure or other requirement to follow in dealing with a spill type incident.

The below actions in s5.4.2 and s5.4.3, or its alternatives, are to be implemented in conjunction with the sites emergency protocols.

5.4.2 Site Control – Incident Response

Emergency contact details are listed in

Table: List of Key Jobs and 24 hour Contact Details

Job title	Name	Contact Number
Director	Luke Parker	0419 224 795
Director	Morgan Parker	0409 363 082
WHS Manager	Ben Haack	0409 041 343
Environmental Manager	Howard Richards	0419 277 431
Contracts Manager	Craig Ley	0417 277 677
General Council	Neil Sher	0405 828 772
Site Manager	Brad Scobie	0409 770 944
Group Operations Manager	Jordan Binskin	0427 830 199
Assistant Site Manager	Matthew Goldstone	0488 471 324

To cover the requirements of this plan a generic procedure for site control and communications internally and with the appropriate government agencies, neighbours and other stakeholders appears below.

Follow Incident Reporting and Investigation Procedure WHS-SPR-PRO-011.

Generic Procedure for Site Control and Communications – use only if site specific procedure does not exist

After the incident has been immediately reported a site controller must be appointed. The Site Controller function is to coordinate the spill response actions in this procedure including co-coordinating reporting internally to the relevant authorities and any affected neighbours.

Having a site Controller is a requirement under Fire and Rescue's Emergency Response Plan requirements if the site stores more than the manifest quantities of dangerous goods. This is triggered if more than 2,500 l of Class 3 flammable liquids (e.g. petrol, paints etc.) are stored on site.

Having a site controller provides for a chain of command at an incident where one person can take charge of the clean-up of the incident and hand over control to other Site Controllers as more capable staff arrives. The Site Controller will also hand over control to:

- The Emergency Information box contains the wardens and command and communication protocols in the event of an incident.
- The appropriate combat agency, (i.e. Fire and Rescue, EPA etc.) once they attend the incident scene, as is likely for a major incident

The Site Controller's responsibility will, after arrival of the combat agency, assist them by:

- Providing advice on the incident and its details (i.e. type of spill, chemicals involved, quantities involved and actions undertaken and in progress)
- Enabling equipment, plant and materials to be available to the combat agency's use in assisting of making the incident safe and minimising harm to the environment

Once an incident has occurred and has been reported, the following Table represents the actions and responsibilities and lists who becomes the main emergency controller of the incident.

Table 6 – Process for Site Controller for co-ordinating with the authorities

Major incident Reporting Response		Management Actions	Contractor Management Actions
1.	For major **POLLUTION INCIDENTS immediately** appoint an interim site controller.	The Site Manager is the interim site controller. In the event that the Site Manager is not present, it is the Yard Manager.	Contractor to appoint interim site controller who is at the scene, to be handed over to a Sell & Parker site controller. Contractor to provide advice.
2	Arrival of more senior Sell & Parker Controller appointed Site Controller	Interim Site controller to hand over to Sell & Parker Site Controller and provide advice.	Contractor to follow instructions from Sell & Parker site controller and provide advice.
3.	Arrival of a combat agency – Fire and Rescue, EPA or SafeWork. Combat agencies to make	Site Controller to hand over to Combat agency Site	Site Controller to hand over to Combat agency Site

	clear who their Site Controller is. (A reported pollution incident will generally result in a combat agency arriving).	Controller, assist provide advice and follow instructions.	Controller assist provide advice and follow instructions.
4.	Advice to combat agency	Advice can include maps and equipment which is at hand which may assist in combating the incident.	Advice can include maps and equipment which is at hand which may assist in combating the incident.

Evacuation

For large dangerous incidents such as large bush fires or major flooding, the Site Controller may consider evacuation of staff to appropriate distances away from the incident. If an Emergency Plan has been developed, this plan will provide appropriate distances and or locations of evacuation areas.

5.5 Procedures for Notifying Pollution Incident to EPA, Local Councils or Relevant Authorities

This is covered under:

- S6.2 Website Information
- This section 5.4

6 EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

6.1 Community Communication and Consultation

Sell & Parker has and would continue to undertake community and stakeholder consultation where deemed applicable.

Sell & Parker will continue to update the community where required, taking advice from emergency services.

An assessment of the typical pollution incident types has been undertaken, in Chapter 4 and in other Sell & Parker documents to consider the potential impacts on neighbours. This resulted in the early warning actions located in Table 7 below.

Table 7: List of Typical Main Pollutants and Potential Neighbour Impacts and Early Warnings

Air Based Emissions		
Description	**Potential Risks**	**Early Warning actions**
Fugitive emissions	Air quality issues Loss of amenity Community complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Fire – smoke Gaseous substance leak	Air quality issues	In the unlikely event of an extreme incident contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice. For larger fires, coordinate with combat agencies.
Noise	Loss of amenity	Not required under PIRMP. Communicate with neighbours on as needs basis.
Odour	Air quality issues Loss of amenity Community Complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Spill type emissions		
Fuel including diesel and petrol based fuels	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Lubricants and hydraulic oils	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Pesticides/herbicides	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice.

		For larger spills coordinate with combat agency.
Other chemicals	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Soils and erosion	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Contaminated materials uncovered	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Wastes	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice

6.2 Website information

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009 s98D:*

> *(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:*
>
> *(a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,*
>
> *(b) if the person does not have such a website--by providing a copy of the plan, without charge, to any person who makes a written request for a copy.*
>
> *(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:*
>
> *(a) section 153C(a) of the Act, and*
>
> *(b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).*
>
> .

Below is a recommended layout of what should be published on the Sell & Parker website with a link to it in a prominent position.

Emergency Incident Response Procedures

Under *Part 5.7 of the POEO Act*, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions) or property damage of an amount over $10,000.

For the above pollution incidents, Sell &Parker and the Group Environment Manager will be responsible for reporting to the authorities below without delay.

Relevant authorities' notification order

If there is an immediate threat to human health or the environment: call first

Fire and Rescue	000
EPA	131 555
SW Parramatta PHU (Sydney West AHS)	02 9840 3603
SafeWork NSW	131 050
Blacktown City Council	02 9839 6000

If there is <u>not</u> an immediate threat to human health or the environment: call first

EPA	131 555
Blacktown City Council	02 9839 6000
SW Parramatta PHU (Sydney West AHS)	02 9840 3603
SafeWork NSW	131 050
Fire and Rescue	1300 729 579

Sell & Parker Environmental Complaints/Incident Reporting number 8212 9561

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process. The Site Manager or nominee will be responsible for coordinating the door knock.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.

6.3 Availability and Location of This Plan

The *POEO (General) Regulation 2009 s98D(1)* states:

(*1) A plan is to be made readily available:*

(a) to an authorised officer on request, and

(b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.

The availability of this Plan will be made available by locating printed copies in the same locations as the Environment Protection Licence (EPL) is located – namely in the main office building located at Sell & Parker Kings Park.

Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2009 s98D(3) which States

4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

7 TRAINING – SUMMARY AND REFERENCE TO PROJECT PROCEDURE

Necessary environmental management competencies have been determined for each of the broad positions in Sell & Parker Kings Park including:

- Contracts Managers
- Group Operations Manager
- Site Manager
- Assistant Site Manager
- Yard Managers
- Assistant Yard Managers

Training of Sell & Parker staff falls into several categories:

- Formal External Training
- Formal Internal Training
- Project / Site Training Information provided on site such as inductions and toolbox talks, training exercises

The information regarding this training is readily available to Sell &Parker employees and contractors on the Sell & Parker Intranet and Resources drive on all Sell & Parker Computers which details the training material to be provided in training sessions.

To also satisfy the requirements under this PIRMP the training is to also include:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents e.g. spill response procedure

8 UPDATING OF PLAN

Effective date: 31 January 2025

Review date This Plan will be reviewed and where required updated according to the following:

- The following calendar year from the last update; or
- Within one month of a notifiable incident: or
- As identified after testing of the PIRMP (see section 8).

9 TESTING

The POEO (General) Regulation 2009 98E states for testing of the Plan:

1) The testing of a plan is to be carried out in such a manner as to ensure that 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.

2) Any such test is to be carried out:
(a) routinely at least once every 12 months, and
(b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to 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

Testing of the Plan will be integrated into other emergency and incident testing and training programs where possible. Testing will be organised by the Group Environment Manager in conjunction with the Site Manager.

Records of the testing will be kept by the Group Environmental Manager.

Testing dates This Plan will be tested according to the following:

- Every calendar year, or
- Design of the testing method will be 1 month before the initial test date, or
- Before one month after a reportable incident.

Recording of Testing

A detailed record of the testing of the Plan will be prepared after each testing of the plan is undertaken. If the test identifies any shortcomings in the Plan, especially the implementation of the spill response procedures, the Plan will be corrected or appropriate non-conformance actions will be undertaken.

10 IMPLEMENTATION OF THE PLAN

The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs. $2 million maximum fines apply for failing to implement the Plan.

Hence if a pollution incident occurs:

- It must be responded to according to this Plan and its reference documents.
- An incident response report/audit must be completed as per condition R3 of EPL 11555.

APPENDIX 1 RISK MODULES

This Plan uses a risk assessment process to demonstrate the existing risk control methods are effective in preventing and minimising environmental harm from pollution incidents. If or when unacceptable risks are identified new control measures will be introduced. The modular format permits the use of common activities associated with Scrap Metal Processing and the shredder to be used in future PIRMP documents. The modules used for this Plan for the Sell & Parker Kings Park site include:

- Aqueous Management
- Chemical Management
- Stockpile Management
- Waste Management

Each module uses a standard risk matrix which can be found in WHS-SPR-FOR-002 and has a guide to completing JSA form.

Each module lists the type of use or storage for the pollutant/s being considered.
Each of the above is considered for a range of hazards and their control method considered. Also considered in the above process is:

- Impact on neighbours
- Safety
- Location
- If the pollutant is a hazardous chemical

Risk Matrix

Environmental risks associated with Sell & Parker Kings Park and its contractor's activities use the following table.

Risk Assessment Matrix

Consequence	Insignificant	Minor	Moderate	Major	Severe
Probability	1	2	3	5	8
Almost Certain 5	Medium A5	Medium B5	High C5	Extreme D5	Extreme E5
Likely 4	Medium A4	Medium B4	High C4	High D4	Extreme E4
Possible 3	Low A3	Medium B3	Medium C3	High D3	Extreme E3
Unlikely 2	Low A2	Low B2	Medium C2	Medium D2	High E2
Rare 1	Low A1	Low B1	Low C1	Medium D1	Medium E1

Consequence Descriptors

CONSEQUENCE	CRITICAL SUCCESS FACTORS						
	SAFETY	QUALITY OF SERVICES	REPUTATION	ENVIRONMENT	FINANCIAL	LEGAL CONTRACTUAL	PLANT & EQUIPMENT DAMAGE
SEVERE	Loss of life	Severe impact on the quality of services provided by the Company resulting in a significant increase in complaints from the community (increase of ≥50%)	External reputation irrevocably destroyed or damaged. Severe impact on staff turnover (increase of >20% above average)	Catastrophic environmental damage leading to fines against the Company.	Costs above $500,000	**Legal**. Numerous major litigations **Contract**. Termination of contract for default	Machine unrepairable
MAJOR	Serious lost time injury resulting in long-term physical impairment of personnel. E.g., total loss of digit	Considerable impact on the quality of services provided by the Company resulting in a marked increase in complains from the community (increase of 25-50%)	External reputation severely damaged with considerable effort and expense to recover. Major staff impact turnover (increase of 15-20% above average)	Extensive environmental damage requiring significant resources to rectify	Costs between $50,000-$500,000	**Legal**. Single major litigation or numerous moderate litigations **Contract**. Written notice from contractor threatening termination if not rectified	5-20 days machine downtime
MODERATE	Minor lost time or restricted work injuries with no long-term impact. E.g., broken ankle	Some impact on the quality of services provided by the Company resulting in an increase in complaints from the community (10-25%)	External reputation damaged with some effort and expense required to recover. Moderate impact on staff turnover (increase of 10-15% above average)	Some environmental damage requiring some resources to rectify	Costs between $20,000-$50,000	**Legal**. Single moderate litigation or numerous minor litigations **Contract**. Verbal advice that, if breaches continue, default notice may be issued	2-5 days machine downtime
MINOR	Medical practitioner injury treatment or Medical practitioner prescription approval. E.g., stitches required	Minor impact on the quality of services provided by the Company resulting in an increase in complaints from the community (>10%)	External reputation minimally affected with little effort or expense required to recover. Minor impact on staff turnover (increase of 5-10% above average)	Minor environmental damage with rectification within existing budget	Costs between $5,000-$20,000	**Legal**. Single minor litigation **Contract**. Contractor expressions of concern	Up to 24hrs of machine downtime
INSIGNIFICANT	First aid injuries that can be treated on site. E.g., minor lacerations, abrasions	No impact on the quality of services delivered by the Company	External reputation not affected. No impact on staff turnover	No material environmental damage	Costs below $5,000	**Legal**. Threat of litigation requiring small compensation **Contract**. No effect on contract performance	No machine downtime

The hazards, likelihood and pre-emptive measures assessments which follow use table A in assessing the environmental risks associated with the hazards identified.

Aqueous Based Management Risk Module 1

Purpose

This risk module forms part of the Sell & Parker Kings Park risk management process. The activities associated with this module are related only to aqueous based materials, generally water and wastewater management.

Activities

Aqueous management involves:

- The collection, processing and reuse of surface water on site.
- Prevention of mud and litter being deposited on trafficked roadways;
- Maintenance and cleaning of sediment control works;
- Protection of soil and other stockpiles from erosion by rain;
- Management of the on-site retention basin;
- Preventing discharge of water from site (other than roofs and the front carpark)

This risk module describes the main hazards to human health or the environment associated with aqueous management. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as per section 5.4. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 6 of this document are to be initiated.

Further details on the risk assessment and appropriate control methods can be found in the following documents:

WHS-SP-PRO-002
WHS-SPR-FOR-002

The module has been written to cover general environmental hazards and their controls. As the site environmental management system is fluid, new documentation may better reflect the risks and controls.

List of Polluting Substance Storages/Uses at Site Initial Assessment – Aqueous Management								
Site Name: Sell & Parker					Responsible person: Howard Richards		Date 31 Jan 2025	
Name / description	**Hazardous Chemicals**	**Amount stored**	**Location of storage**	**Map ref**	**Need for early warning[1]**	**Pre-emptive action ref**	**Ref to safety coverage**	**Ref to Hazard and likelihood assessment**
MATERIALS (e.g. stockpiles, silos, bulk solids etc.)								
sediment entering waterways	no	variable	Whole of site	Whole of site	Only in extreme cases where sediment threatens to impact on health of waterway	Excavation procedure Inspection protocols	Site drains sealed and inspected monthly	See items 1. 2. and 3.2
[add to list]								
AQUEOUS (e.g. retention basin, wastewater tanks, other water storage area)								
waste water discharge off site	Only if in the event of a hazardous chemical spill	1-10ML	Rear of 45 Tattersall Rd	Incident dependent	Only in extreme cases where spills threaten to impact on health of waterway	Water use procedure Site cleaning procedure Spill response procedure	Site drains sealed and inspected monthly	See items 1. 2. and 3.
[add to list]								
SUBSTANCES IN PROCESSES (substances which could be emitted)								
rubbish and litter	Only for asbestos waste	Nil	Whole of site	N/A	If asbestos is found and fibres enter waterway or become airborne and threaten to impact community	Waste management procedure Asbestos handling procedure	Site drains sealed and inspected monthly	See item 5
[add to list]								

[1] Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

Hazard and Likelihood Risk assessment and Corrective Control Measures – Soil and Water Management Sell & Parker Kings Park [this module is an example only of what a risk assessment might contain]								
Site Name: Sell & Parker						Responsible person: Howard Richards		31 Jan 2025
Name / ref of pollutant/ chemicals	**Description of Hazard / Incident leading to hazard**	**Level of impact**	**Likelihood**	**Priority**	**Impact on neighbours**	**Control Measures Corrective Action**	**Responsible Person**	**Date**
1.Wastewater discharge off site from sediment basins	Insufficient treatment leading to suspended solids loading	I	R	L	Unlikely but possible	1. Retention basin management procedure 2. Staff induction and training 3. Environment Incident procedure		
	Low pH discharge	I	R	L	Unlikely but possible	1. Retention basin management procedure 2. Staff induction and training 3. Environment Incident procedure		
	Insufficient oil/grease removal leading visible oil/grease discharge	I	R	L	Unlikely but possible	1. Spills procedure 2. Staff induction and training 3. Environment Incident procedure		
2.Wastewater overflow from sediment basins	Failure / collapse of basin wall causing sediment laden material to move off site	M	R	L	Unlikely but possible	1. Site EMS 2. Design capacity of basin 3. Regular inspections 4. Staff induction and training 5. Environment Incident procedure		
	Insufficient emptying of basin prior to previous rain event causing overflow off site	M	U	Y	Unlikely but possible	1. Site EMS 2. Regular inspections 3. Staff induction and training 4. Environment Incident procedure		
	Extreme rain event causing overflow off site	M	U	Y	Unlikely but possible	1. Site EMS 2. 100 year flood factored into design 3. Regular inspections 4. Staff induction and training 5. Environment Incident procedure		

Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Level of impact	Likely hood	Priority	Impact on neighbours	Control Measures Corrective Action	Responsible Person	Date
3.Untreated run off	Failure of erosion or sediment controls causing sediment laden material to leave site	I	R	M	Unlikely but possible	1. Regular inspections 2. Staff induction and training 3. Environmental Management of Construction site dewatering 4. Environment Incident procedure		
	Failure of erosion or sediment controls but run off remains on site	I	R	M	Unlikely but possible	1. Regular inspections 2. Staff induction and training 3. Environmental Management of Construction site dewatering 4. Environment Incident procedure		
4.Rubbish and other	Improper disposal of waste material found in soil, causing contamination of land or water	I	R	M	Unlikely but possible	1. Contractor to remove and dispose in accordance with council regulations 2. Staff induction and training 3. Contractor waste management plan 4. Environment Incident procedure		
5.Plant and equipment leaks and spills	Spills into waterways from plant and equipment (e.g. hydraulic hose leaks, concrete loading, leaks from vehicles)	I	R	M	May impact on surface water quality if it goes off site	1. Site EMS requires the following: to ensure that chemical storage areas must be suitably located and bunded in a secure protected area with an impermeable floor. First flush systems act as capture / additional containment 2. Spill response measures implemented as per spill procedure or s5.5 of this Plan 3. Auditing of site EMS and procedures 4. PIRMP exercise		

Chemical Handling and Storages Risk Module 2 -example only-

Purpose

This risk module forms part of the site information. The activities associated with this module generally relates to chemical handling and storages as classified as hazardous chemicals under the WHS Regulation 2011 but can include other non-aqueous liquid chemicals used at the site.

Activities

Use of chemicals on site is limited to:

- Petroleum products - fuels, lubricants, hydraulic oils, cutting oils and cleaning solvents, etc. Largely class 3 flammable or combustible liquid classification
- Surface coatings – paints, membranes, aerosol cans, other surface coatings
- Waste chemicals – including waste contaminated with chemicals such as spill clean-up materials, cleaning chemicals, floc etc.
- Other chemicals stored in smaller quantities in groups

This risk module describes the main hazards to the environment associated with chemical use and storage. The first table in the risk module lists the potential pollutants. The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in *RMS Environmental Incident Classification and Reporting Procedure*. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 6 of this document are to be initiated.

Further details on the risk assessment and appropriate control methods can be found in the WHS Management System.

The module has been written to cover general environmental hazards and their controls.

List of Polluting Substance Storages/Uses at Site Initial Assessment - Chemical Use and Storage at Sell & Parker								
Operational Area: Across the site					Responsible person: Howard Richards		Date: 31 Jan 2025	
Name / description	**Hazardous Chemicals**	**Amount stored/ used**	**Location of storage**	**Map reference**	**Need for early warning[2]**	**Pre-emptive action ref**	**Ref to safety coverage**	**Ref for Hazard and likelihood assessment**
CHEMICALS (raw materials and products which can cause pollution)								
Application of surface coating, paint by spray, brush or roller	Class 3 PG III	20 L max	Flammable cupboards	Non-ferrous shed Maintenance shed	Only in the event of off-site odour and water emissions	Take 5 Small volume containers	BT-OPS-PRO-ODR BT-ENV-PRO-DIS WHS-SPR-PRO-018 WHS-SPR-PRO-005	Low 24
Storage of paints and surface coatings	Class 3,	400 L max	Flammable cupboards	Non-ferrous shed Maintenance shed	Only in significant off-site emissions	AS1940-2017 – The storage and handling of flammable and combustible liquids complaint.	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Low 24
Storage of other chemicals such as thinners and cleaners for painting equipment	Class 3	400 L max	Flammable cupboards	Non-ferrous shed Maintenance shed	Only in significant off-site emissions	AS1940-2017 – The storage and handling of flammable and combustible liquids complaint.	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Low 24
Petrol storage	Class 3	2000 litres	End of Life Vehicle de-fuelling area	End of Life Vehicle de-fuelling area	Only for offsite emissions	AS1940-2017 – The storage and handling of flammable and combustible liquids complaint.	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Medium 18
Petrol re-fuelling	Class 3	50 litres	Flammable cupboards	Non-ferrous shed Maintenance shed	Off-site emissions or large internal spillage	JSA	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Medium 18

[2] Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

List of Polluting Substance Storages/Uses at Site Initial Assessment - Chemical Use and Storage at Sell & Parker Kings Park site								
Name / description	**Hazardous Chemicals**	**Amount stored/ used**	**Location of storage**	**Map reference**	**Need for early warning**	**Pre-emptive action ref**	**Ref to safety coverage**	**Ref for Hazard and likelihood assessment**
Diesel fuel storage	C1 combustible	5000 L in bulk tanks New and used	Maintenance shed Oil store Truck wash	Maintenance shed Oil store Truck wash	Off-site emissions or large internal spillage	Bunded areas	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Medium 13
Diesel fuel – re-fuelling	C1 combustible	10,000L in tanker	Not stored, contractor tanker	Variable	Off-site emissions or large internal spillage	Contractor JSA	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-PRO-019	Medium 18
Oil and grease for lubrication of plant and equipment	C2 combustible	10,000 L max	Maintenance shed Oil store	Maintenance shed Oil store	Off-site emissions or large internal spillage	Take 5 Small volume containers	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Low 24
Hydraulic oil for plant and equipment storage and use	C2 combustible	40,000 L max	Maintenance shed Oil store Truck wash	Maintenance shed Oil store Truck wash	Off-site emissions or large internal spillage	AS1940-2017 – The storage and handling of flammable and combustible liquids complaint.	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Low 24
Compressed gases – air, oxy-acetylene sets and LPG	2.1 flammable or non-toxic non-flammable	2 tonne	Truck wash Oxygen tank	Maintenance shed Oil store Truck wash	Off-site emissions or large internal spillage	Australian Standard storage vessels	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Medium 12
Pesticides - Use	Class 6.1	20L on site	Not stored on site, brought in for purpose	Variable - Site boundaries	Off-site emissions or large internal spillage	Contractor JSA Small volume containers	WHS-SPR-PRO-005 WHS-SPR-PRO-018 WHS-SPR-PRO-008	Medium 18
Wastes – liquid wastes from pit pump outs	Suspended solids Metals	500,000 L max	Exit weighbridge Rear Road Oil store Rear floc shed	Exit weighbridge Rear Road Oil store Rear floc shed	Off-site emissions or large internal spillage	BT-EN-PRO-CBC Bund checks Weekly inspections	WHS-SPR-PRO-018 WHS-SPR-PRO-008	Low 21

Hazard and Likely hood Risk Assessment and Corrective Control Measures **Chemical Handling and Storages**								
Site Name: Sell & Parker Kings Park						Responsible person: Howard Richards		Date 31 January 2025
Name / ref of pollutant/ chemicals	**Description of Hazard / Incident leading to hazard**	**Severity**	**Likelihood**	**Risk Factor**	**Impact on neighbours**	**Control Measures** **Corrective Action**	**Responsible Person**	**Date**
1P, 2P, 1D, 2D, 1F, 2F (petroleum and paint product usage and storages in dedicated storage areas)	Catastrophic leak from storage container – enters stormwater drain – overflows and some enters Waller Creek	M	R	L	Nil Water not utilised	1. Staff training 2. Spills procedure 3. EMP section dangerous goods 4. EMP section incident management 5. First flush system	Howard Richards	**Jan 25**
	Spills and leaks around the site pavement area overflows and some enters Waller Creek.	M	R	L	Nil Water not utilised	1. Staff training 2. Spills procedure 3. EMP section dangerous goods 4. EMP section incident management	Howard Richards	**Jan 25**

Hazard and Likely hood Risk Assessment and Corrective Control Measures **Chemical Handling and Storages**								
Name / ref of pollutant/ chemicals	**Description of Hazard / Incident leading to hazard**	**Severity**	**Likelihood**	**Risk Factor**	**Impact on neighbours**	**Control Measures** **Corrective Action**	**Responsible Person**	**Date**
1P, 2P, 1D, 2D, 1F, 2F, 1O (petroleum and paint product usage and storages in dedicated storage areas)	Odour and other air emissions	3	P	M	May impact on neighbours down wind	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management	Howard Richards	**Jan 25**
	Fire in storage area – smoke air emissions	4	P	M	May impact on neighbours down wind	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management • Working in fire season procedure	Howard Richards	**Jan 25**
2F, 2D, 1O Refuelling of plant and equipment around the site	Spills and leaks into the stormwater drains	3	P	M	Nil Water not utilised	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management • Drain wardens	Howard Richards	**Jan 25**

Hazard and Likely hood Risk Assessment and Corrective Control Measures Chemical Handling and Storages								
Name / ref of pollutant/ chemicals	**Description of Hazard / Incident leading to hazard**	**Severity**	**Likely hood**	**Risk Factor**	**Impact on neighbours**	**Control Measures Corrective Action**	**Responsible Person**	**Date**
Pesticides	Spill from container – enters stormwater drain	4	U	L	Nil Water not utilised	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management • Drain wardens	Howard Richards	**Jan 25**
Waste storage	Leaks and spills from waste storage entering stormwater systems etc.	4	U	L	Nil Water not utilised	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management • Drain wardens	Howard Richards	**Jan 25**
Plant and equipment leaks and spills	Spills into waterways from plant and equipment (e.g. hydraulic hose leaks, concrete loading, leaks from vehicles and road plant.)	4	U	L	Nil Water not utilised	• Staff training • Spills procedure • EMP section dangerous goods • EMP section incident management • Drain wardens	Howard Richards	**Jan 25**

APPENDIX 3 – REGULATORY REQUIREMENTS

PIRMP Legislation

POEO Act Part 5.7

153A	**Duty of licence holder to prepare pollution incident response management plan** The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.
153C	**Information to be included in plan** A pollution incident response management plan must be in the form required by the regulations and must include the following: (a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and (iii) any persons or authorities required to be notified by Part 5.7, (b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution, (c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made, (d) any other matter required by the regulations.
153D	**Keeping of plan** A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.
153E	**Testing of plan** A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.
153F	**Implementation of plan** If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.

POEO (General) Regulation 2009

98C(a)	**Hazards:** A description of the hazards to human health or the environment associated with the activity to which the licence relates
98C(b)	**Likelihood:** the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,
98C(c)	**Pre-Emptive Action:** details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,
98C(d)	**Pollutant Inventory Types:** an inventory of potential pollutants on the premises or used in carrying out the relevant activity,

	Pollutant Inventory Quantities:
98C(e)	the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,
	Safety Equipment:
98C(f)	a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,
	Staff Contacts:
98C(g)	the names, positions and 24-hour contact details of those key individuals who: are responsible for activating the plan, and are authorised to notify relevant authorities under section 148 of the Act, and are responsible for managing the response to a pollution incident,
98C(h)	**Authority Contact:** the contact details of each relevant authority referred to in section 148 of the Act,
	Early Warnings Neighbours:
98C(i)	details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,
	Staff Safety:
98C(j)	the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,
	Maps:
98C(k)	a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,
	Early Warnings General:
98C(l)	a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,
98C(m)	**Training of Staff:** the nature and objectives of any staff training program in relation to the plan,
	Timing of Testing:
98C(n)	The dates on which the plan has been tested and the name of the person who carried out the test,
98C(o)	**Updating of Plan:** the dates on which the plan is updated,
98C(p)	**Plan Testing** the manner in which the plan is to be tested and maintained.
	Availability of plan:
98D(1)	(1) A plan is to be made readily available: (a) to an authorised officer on request, and (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.
	Publishing Plan Parts:
98D(2)	(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: (a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, (b) if the person does not have such a website--by providing a copy of the plan, without charge, to any person who makes a written request for a copy.
	Procedures under Act:
98D(3)	3) Subclause (2) applies only in relation to that part of a plan that includes the information required under: (a) section 153C(a) of the Act, and (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).
98D(4)	**Privacy Protection:**

(4) Any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998* is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

Testing of the Plan - 1) The testing of a plan is to be carried out in such a manner as to ensure

98E(1) that 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.

Minimum Testing:

2) Any such test is to be carried out:

(a) routinely at least once every 12 months, and

98E(2) (b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to 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

APPENDIX 4 – SITE MAP