

APPENDIX G

KURNELL RESOURCES FACILITY Pollution Incident Response Management Plan

RECORD OF PIRMP TESTING

PIRM Revision	Test Date	Test Records Location	Test Method	Tested by	Next Scheduled Date
Rev_3	25 March 2019	\\KLFDC\Public\08. Engineering & Administration\Environmental Management\EMP	Desktop review	Rob Young Ben Warner	March 2020
Rev_4	26 March 2020	\\KLFDC\Public\08. Engineering & Administration\Environmental Management\EMP	Desktop review	Rob Young Ben Warner	March 2021
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1. INTRODUCTION

Breen Resources Pty Ltd (Breen) owns and operates the Breen Resources Facility at 330 Captain Cook Drive, Kurnell. The Breen Resources Facility receives excavated materials and selected construction and demolition (C&D) waste for recovery and carries out site restoration by application of residual materials, generated during the resource recovery process, to land (landfilling).

The Breen Resources Facility operates in accordance with two Environment Protection Licences (EPL 4608 and EPL 20697) issued by the Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997 (POEO Act)*.

The landfill operation is undertaken in accordance with conditions stipulated in EPL 4608. The recycling facilities are operated in accordance with conditions stipulated in EPL 20697.

In accordance with the *Protection of the Environment Operations Act 1997 (the POEO Act)*, the holder of an Environment Protection Licence 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.

This PIRMP has been prepared in accordance with the requirements of *Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)* and *Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO (General) Regulation)* to provide personnel with a framework defining the way pollution incidents are managed, reported and communicated to the general community, and to the relevant NSW government authorities and services.

As defined by the *EPA Guideline: Pollution Incident Response Management Plans (March 2020)*, 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 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.

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

1.1 Definitions

POEO Act defines pollution as: "*Pollution means— water pollution, or air pollution, or noise pollution, or land pollution.*"

The POEO Act defines a pollution incident as: "*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.*"

The POEO Act (s. 147) defines material harm to the environment as:

(1) *For the purposes of this Part –*

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

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

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

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

2. LIKELY HAZARDS TO HEALTH AND ENVIRONMENT

The Breen Resources Facility accepts construction and demolition waste for recovery and non-recyclable (non-putrescible) waste for disposal. It also accepts Virgin Excavated Natural Material (VENM) for landfill closure and Parklands construction.

Identified hazards to health and the environment on site are detailed in the table below. Each potential hazard has been assessed in accordance with the Breen Risk Assessment matrix which is discussed in section 2.3 of this plan.

Potential Hazard	Likelihood of Occurrence	Events that could increase likelihood
Dust	12 Medium	Dry, windy conditions
Odour	1 Low	Still conditions during the day, followed by cold, still night
Noise	1 Low	Specific activities outside normal operations
Fuel Spill	7 Medium	Bund failure, plant and equipment failure
Oil/Lube spill	4 Low	Bund failure, plant and equipment failure
Chemical spill	7 Medium	Increase current low volumes of chemical storage
Fire	13 Medium	Prolonged dry weather, incompatible waste types being mixed, smoking occurring outside of the designated areas
Leachate dam overflow	5 Low	Prolonged wet weather
Contaminated Fill (asbestos)	3 Low	Lack of governance relating to verification of source material or lack of inspections
Discovery of Radioactive Material	1 Low	Lack of governance relating to verification of source material arriving at the site or lack of inspections
Stormwater contamination	5 Low	Contaminated storm water runoff (sediments and or leachate) from the site resulting from prolonged wet weather
Discovery of hazardous waste	5 Low	Increasing gate fees and NSW waste levy on special and restricted wastes may lead to customers attempting to dispose of more hazardous materials (asbestos etc)

2.1 Risk matrix

Each potential hazard has been assessed in accordance with the Breen Risk Assessment matrix as discussed in the table below.

		Consequence				
		<i>Negligible Injury – First aid treatment</i>	<i>Minor Injury – Injury requiring medical treatment</i>	<i>Moderate – Injury requiring extensive medical treatment</i>	<i>Major– Injury resulting in permanent incapacitation</i>	<i>Catastrophic Injury – Injuries resulting in single or multiple deaths</i>
		<i>Negligible or no quality damage/impact</i>	<i>Minor quality damage/impact</i>	<i>Significant quality damage/impact</i>	<i>Major quality damage/impact</i>	<i>Extensive quality damage/impact</i>
		<i>Negligible or no environmental damage/impact</i>	<i>Minor environmental damage/impact</i>	<i>Significant environmental damage/impact</i>	<i>Major environmental damage/impact</i>	<i>Extensive environmental damage & biodiversity degradation</i>
Likelihood		<i>Negligible financial loss <=\$5K</i>	<i>Minor financial loss \$5K-\$50K</i>	<i>Substantial financial loss \$50K-\$500K</i>	<i>Significant financial loss \$1m+</i>	<i>Extreme financial loss \$5m+</i>
<i>Almost certain</i>	11 Medium	16 High	20 High	23 Extreme	25 Extreme	
<i>Likely</i>	7 Medium	12 Medium	17 High	21 High	24 Extreme	
<i>Possible</i>	4 Low	8 Medium	13 Medium	18 High	22 High	
<i>Unlikely</i>	2 Low	5 Low	9 Medium	14 Medium	19 High	
<i>Very Unlikely</i>	1 Low	3 Low	6 Low	10 Medium	15 High	

2.2 Pollutant inventory on the premises

Breen has an inventory of hazardous substances and their Safety Data Sheets (SDS) are available at the site office. This inventory is updated on a regular basis.

Inventory of pollutants stored on site are detailed in the table below.

Name	Hazardous?	Amount Stored	Location & Method of Storage
Fuel (diesel)	Yes	20,000 L	Self-bunded above ground storage tank – refer map below
Oil	Yes	2500 L	Workshop (bunded) – refer map below
Coolant	Yes	100 L	Workshop (bunded) – refer map below
10ft Dangerous Goods Container	Yes	700 L	Self-bunded chemical storage container – refer map below
Regenesis (Oxidizer)	Yes	3,500 KG	Brown container opposite workshop (locked) – refer map below
Misc Workshop Chemicals	Yes	60 L – 200L	Workshop (bunded in chemical area and bunded pallets) – refer map
Compressed Gasses	Yes	60 L – 100L	Workshop – refer map
Cleaning Chemicals	Yes	20 L	Kitchen Store – refer map

3. PRE-EMPTIVE ACTIONS

Control measures to minimise or prevent the risk of harm to the environment or human health arising from landfilling and recycling activities are described in the table below.

Potential Hazard	Pre-emptive Actions
Dust	<ul style="list-style-type: none"> • Use of two water trucks (approx. 15,000L) used on the site to suppress dust on haul roads during summer months and one water truck during winter months (or as conditions require), additional portable water tanks and water storage is also available on site. Sprinklers used to suppress dust on gypsum and recycled aggregate stockpiles and screening/crushing plant. • Gypsum processing operations cease in windy conditions when wind exceeds 20km/hr from the north-west, north or north-east direction (towards the new residential suburbs). • Regular site inspections conducted by site supervisors and engineers. • Stop work operations if dust controls are not working
Odour	<ul style="list-style-type: none"> • Use of appropriate daily and intermediate cover. • Putrescible waste is not accepted.
Noise	<ul style="list-style-type: none"> • Use of noisy equipment in isolated and low-lying areas of the site. • All machinery is regularly maintained and serviced to ensure compliance with manufacturers standards. • Selection of acoustically efficient device, plant and equipment for the task or application or with acoustic insulation.
Fuel Spill	<ul style="list-style-type: none"> • Use of hydrocarbon spill response kits. • Use appropriately sized bunding of above ground storage tanks. • Staff training - tool box talks and safety meetings. • Regular inspections of tanks, plant and equipment. • Undertake regular groundwater monitoring in accordance with EPL4608.
Oil/Lub Spill	<ul style="list-style-type: none"> • Use of hydrocarbon spill response kits. • Use appropriately sized bunding of above ground oil storage tanks. • Regular inspections of plant and equipment. • Staff training - tool box talks and safety meetings. • Undertake regular groundwater monitoring in accordance with EPL4608.
Chemical Spill	<ul style="list-style-type: none"> • Storage of limited volumes of chemicals in a dry locked store. • Use of chemical spill kits. • Staff training - tool box talks and safety meetings. • Use of appropriate PPE (gloves, mask). • Undertake regular groundwater monitoring in accordance with EPL4608.
Fire	<ul style="list-style-type: none"> • Use of water carts with water cannons, readily available water from dams on site. • Additional portable water is available in water tanks. • Inspection by NSWFB of premises to familiarise site layout and hazards. • Smoking being restricted to designated areas away from any waste. • Segregation of waste types to ensure like materials are grouped together. • Regular fire inspection of landfill areas • Analyse data collected from the thermal monitoring probes installed at the eastern part of the landfill. • Fire extinguishers on most plant and infrastructure that is regularly serviced. • Cover material readily available on site.

Potential Hazard	Pre-emptive Actions
Leachate Spill	<ul style="list-style-type: none"> Leachate management plan. Appropriately sized leachate management system. Manage the evaporation of leachate on site. Regular monitoring and inspection to ensure the leachate management system properly maintained. Undertake regular groundwater monitoring in accordance with EPL4608.
Contaminated Fill	<ul style="list-style-type: none"> Waste classification reports prior to acceptance. Inspection of all material at the weighbridge. Inspection of material when being tipped in its final location. Scientific analysis of material as required. Undertake regular groundwater monitoring in accordance with EPL4608.
Discovery of Radioactive Material	<ul style="list-style-type: none"> Waste classification reports prior to acceptance. Confirmation that retrieved metal is free from Radioactive material by Metal Recyclers.
Stormwater Contamination	<ul style="list-style-type: none"> Appropriately sized stormwater detention ponds. Clear separation of leachate and stormwater. Stormwater flows directed to the appropriate collection systems to prevent any discharge from the site (e.g. silt and sediment traps, berms). Regular monitoring and inspection to ensure system is maintained in a proper condition.
Discovery of Hazardous Waste	<ul style="list-style-type: none"> Staff training - tool box talks and safety meetings. Notification of appropriate authorities. Involvement of senior management. Inspection of all material at the weighbridge. Inspection of material when being tipped in its final location.

4. SAFETY EQUIPMENT

Breen has the following safety equipment readily available to staff, used to minimise the risk to human health and the environment:

- Hard Hats
- Safety glasses (tinted and non-tinted)
- Hats
- Sun cream
- Clothing (long sleeve, robust clothes)
- Safety boots
- Respirators/Masks (P2 or greater)
- Overalls (disposable)
- Gloves (leather and synthetic)
- First aid kits
- Spill kits
- Fire extinguishers
- Defibrillator

All safety equipment is stored in the site office and available during working hours. As noted above, Breen has the inventory of hazardous substances and their SDS details available at the site office. Spill kits are in the workshop. Fire extinguishers are in all areas and mobile plant.

Each item of equipment operated on the site has a safe work method statement (SWMS) that contains specific risks and management methods to minimise risks to human health and the environment. These SWMS are routinely reviewed, discussed at site safety meetings and training on the SWMS is provided to all staff. These SWMS are available at the site office.

5. CONTACT DETAILS AND NOTIFICATION PROCEDURE

5.1 What needs to be notified?

Under s. 148 of the POEO Act, Breen has a duty to immediately notify (i.e. via phone) each relevant authority of a pollution incident if there is a risk of material harm to the environment (see Section 1 of this plan for definitions). According to the provisions of s. 150 of the POEO Act:

- (1) *The relevant information about a pollution incident required under section 148 consists of the following –*
 - (a) *the time, date, nature, duration and location of the incident,*
 - (b) *the location of the place where pollution is occurring or is likely to occur,*
 - (c) *the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,*
 - (d) *the circumstances in which the incident occurred (including the cause of the incident, if known),*
 - (e) *the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,*
 - (f) *other information prescribed by the regulations.*
- (2) *The information required by this section is the information known to the person notifying the incident when the notification is required to be given.*
- (3) *If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.*

5.2 Internal pollution incident reporting

If a pollution incident occurs, Breen Resources Facility workers and Occupiers will immediately notify one or more of the following personnel:

Contact	Role	Telephone Number
Damien Vella	CEO	0420 890 065
Michael Glass	Group Operations Manager	0429 956 194
Ian Spencer	Sales and Marketing Manager	0418 274 468
Rob Young	Health and Safety Manager	0412 058 244
Jason Carruthers	Operations Manager – Resource Recovery	0431 422 497
Ben Warner	Project Engineer	0402 232 619
Elena Ivanova	Environmental Engineer	0466 383 059

Contact details are also displayed as posters at various locations on site, to improve accessibility during an emergency situation.

These 24-hour site contacts, listed in the table above, are authorised to contact the relevant agencies and government authorities when required.

Ensure safety is first on site. If an injury occurs **DIAL 000** and provide the following information:

Company: Breen Resources Pty Ltd
Site Address: 330 Captain Cook Drive, Kurnell
Nearest Cross Street: Lindum Road

If Occupiers have not already been otherwise alerted, an Occupier must be contacted immediately following a pollution incident.

Contact	Role	Telephone Number
Edwin Smith	Regyp Site Manager	0402 183 461
Phil Burnapp	Concrete Recyclers Site Manager	0407 258 292

Reporting of incidents will be in accordance with the Breen’s ***Incident Reporting and Investigation Procedure***.

5.3 External pollution incident reporting

Under the provisions of s. 101 of the POEO (General) Regulation 2009:

(1) For the purposes of section 149 of the of the POEO Act, a pollution incident that is required to be notified under section 148 of the Act

(a) is to be notified verbally to each relevant authority, and

(b) is to be followed by notification in writing within 7 days of the date on which the incident occurred.

(2) For the purposes of section 149 of the Act, notification of the EPA may be achieved by telephoning the EPA environment line.

Note: Section 150(2) of the of the POEO Act provides that the information contained in a notification is to be the information known when the notification occurs. Therefore, if information becomes known between the immediate notification given verbally and the time when written notification is required to be given, that new information will be required to be notified immediately after it becomes known and to be included in the written notification.

Pollution incidents must be notified via phone **immediately** as required in the order listed below:

Authority	Telephone Number
Environment Protection Authority (EPA) - ‘Environment Line’	131 555
SafeWork NSW	13 10 50
Sutherland Shire Council (the Local Authority)	(02) 9710 0333
Fire and Rescue NSW*	1300 729 579
NSW Health	(02) 9391 9000
NSW Ministry of Health (via Public Health Units)	(02) 9382 2222 or 1300 066 055
ANSTO (Radioactive materials)	(02) 9717 3111

* Note that if the pollution incident required immediate assistance from emergency services (i.e. 000 was called), Fire and Rescue (NSW) **do not need** to be called again.

5.4 Notification to Landholders and Community

In the event of a pollution incident, Breen has the following processes for contacting the community:

- When an incident occurs, Breen will immediately contact the local authorities listed in Section 5.3 of this plan.
- Breen will consult with the local authorities to determine if the community is to be notified of the pollution incident. Breen will discuss with the authorities the most relevant communication strategy (e.g. social networking groups, direct contact with those potentially impacted).
- Contact with the community to be then completed as per the agreed communication strategy.
- The results of the investigation of any pollution incident resulting in material harm will be placed on Breen's webpage.

6. MINIMISING HARM TO PERSONS ON THE PREMISES

Breen has a central evacuation meeting place that is located adjacent to the site office. All Breen Resources Facility workers and Occupiers are contactable on mobile and 2-way if an evacuation is required. An evacuation procedure is documented and on display in the site office.

The site (where hazardous material is stored) is fenced and alarmed to ensure hazardous materials are secure and cannot be tampered with.

During any incident response, the progress and proposed next steps are to be communicated to relevant stakeholders, government authorities, relevant agencies and Breen's senior management.

7. AVAILABILITY OF THIS PLAN

The PIRMP is available in printed form at the premises. An electronic copy of the PIRMP is also available on the Breen Management System (Skytrust). The PIRMP is publicly available on the company website. It must also be made available at the request of an authorised EPA officer, response agencies during an incident, and members of the public on request.

8. STAFF TRAINING

All Breen personnel are trained to respond to emergency scenarios, including pollution incidents. Also, this PIRMP is being implemented through staff training. Staff training takes the form of ensuring staff are aware of the location of the plan and its contents. It also ensures that the relevant contact personnel are known by staff in the case an incident occurs.

During regular site safety meetings, hazards and Breen's responses to these hazards are discussed. Preventative measures (refer to Section 3 of this plan) are raised in this forum.

9. TESTING AND REVIEW

Testing of this PIRMP will be coordinated by the Health and Safety Manager, Project Engineer and or Environmental Engineer to ensure the information is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

The POEO (General) Regulation states that the testing must be performed routinely at least once every 12 months and within 1 month of any pollution incident.

To meet this requirement one of two methods is used for PIRMP testing:

- Desktop simulation – desktop simulation completed by a competent person; or
- Emergency drill – mock emergency or emergency drill, involving all workers. The emergency drill typically has both safety and environmental components, although may instead consist of two separate emergency drills to test these components.

A detailed record of the PIRMP testing is prepared after each testing undertaken. The dates of testing and the name of members who conducted or participated in the testing are included in the test report. If the test identifies any shortcomings in the plan, it will be corrected, and appropriate non-conformance actions will be undertaken. The plan will be reviewed and updated according to the following:

- 12 months from the last update
- Within one month of a pollution incident
- As identified after testing of the plan.

10. MAPS

Appendix 1 contains drawings that shows location of processing areas and identified hazards at the Breen Resources Facility.

APPENDIX 1

Site Overview



Soil Recycling: UHF11

Landfill: UHF TBA

C&D Recycling Plant: UHF 36

Material Processing: UHF10

Construction: UHF15

Regyp: UHF TBA

Concrete Recyclers: UHF TBA

Weighbridge: UHF Breen 1

Weighbridge Spotter: UHF 11

Site Office Compound Overview



Legend

- Hazardous goods storage
- Evacuation point
- Wheel wash
- Spill kit
- Safety Data Sheet (SDS) in [Skytrust](#)
- First aid it (office and weighbridge)
- Asbestos bin
- Oxidiser in container
- Self-bunded above ground storage tank
- Compressed Gasses