Pollution Incident Response Management Plan

Liquid Waste Treatment Facility – Environment Protection Licence (EPL) 20875

Demast PTY LTD

7 Long Street, Smithfield NSW 2164

T. 02 9756 0214 | E. info@demast.com.au | W. www.demast.com.au | ABN. 65 168 661 514 | EPL. 20875
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Date	Approved by	Position/Title	Organisation	Signature
08/09/2022	Fearghal McNulty	Manager	Demast Pty Ltd	*FM*

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1 Purpose of the plan

Demast Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Demast Pty Ltd – Liquid Waste Treatment Facility (LWTF) 7 Long Street, Smithfield NSW 2164. As per 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.

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

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

This PIRMP has been developed in accordance with the *Protection of the Environment Operations Act 1997*, the *Protection of the Environment Operations (General) Regulation 2009*, and NSW EPA's *Guideline: Pollution incident response management plans 2020.*

2 Environment protection licence (EPL) details

EPL 20875 details are provided below in **Table 1**.

Table 1. EPL details

Name of Licensee/ ABN:	Demast Pty Ltd/ ABN 65 168 661 514	
EPL:	20875	
Premises name/ site address:	Demast Liquid Waste Treatment Facility/ 7 Long Street, Smithfield NSW 2164	
Company of business contact details:	Name: Position or title: Business hours contact number/s: After hours contact number/s: Email:	**Paddy Gavin** **Director/ General manager** **(02) 9756 0214** **0400 525 796** **info@demast.com.au** **paddy@demast.com.au**
Website address:	www.demast.com.au	
Scheduled activity/ activities on EPL:	Waste processing (non-thermal treatment) Waste storage	
Fee based activity/ activities on EPL:	**Fee based activity** Non-thermal treatment of liquid waste Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	**Scale** Any annual processing capacity Any listed waste type stored

3 Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable. Pollution incident contact details are provided below in **Table 2**.

Table 2. Pollution incident – person/s responsible contact details		
PIRMP activation:	**Primary contact**	
	Name of person responsible:	**Paddy Gavin**
	Position or title:	**Director/ General manager**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0400 525 796**
	Email:	**paddy@demast.com.au**
	Alternative contact	
	Name of person responsible:	**Ray Galea**
	Position or title:	**Director**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0426 842 532**
	Email:	**ray@demast.com.au**
Notifying relevant authorities: Notification should be made by a person with an appropriate level of authority within the company	**Primary contact**	
	Name of person responsible:	**Paddy Gavin**
	Position or title:	**Director/ General manager**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0400 525 796**
	Email:	**paddy@demast.com.au**
	Alternative contact	
	Name of person responsible:	**Ray Galea**
	Position or title:	**Director**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0426 842 532**
	Email:	**ray@demast.com.au**
Managing response to pollution incident:	**Primary contact**	
	Name of person responsible:	**Paddy Gavin**
	Position or title:	**Director/Site Manager**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0400 525 796**
	Email:	**paddy@demast.com.au**
	Alternative contact	
	Name of person responsible:	**Ray Galea**
	Position or title:	**Director**
	Business hours contact number/s:	**(02) 9756 0214**
	After hours contact number/s:	**0426 842 532**
	Email:	**ray@demast.com.au**

4 Notification of relevant authorities

Persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment are provided below in **Table 3**.

As per Part 5.7 of the POEO Act the meaning of material harm to the environment is defined 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."

As per the POEO Act dictionary, a pollution incident is defined as:

"*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.*"

Table 3. Notification of relevant authorities contact details

	Relevant authority	Contact number
Emergency contacts:	Police / Fire & Rescue / Ambulance:	**000 (immediate threat)**
	Fire & Rescue without immediate threat:	**1300 729 579**
	Fire & Rescue NSW Smithfield Fire Station (local):	**(02) 9493 1041**
	Environment protection authority:	**13 15 55**
	NSW health (nearest public health unit):	**(02) 9794 0855 (Liverpool)**
	NSW Ministry of Health:	**(02) 9391 9000**
	Local ED hospital (Fairfield):	**(02) 9616 8111**
	SafeWork NSW:	**131 050**
	Local authority (Cumberland City Council):	**(02) 8757 9000**
	Comcare:	**1300 366 979**
	Sydney Water	**1300 143 734 or 132 090 (24/7)**

5 Notification of neighbours and the local community

Owners or occupiers of premises in the vicinity of the licensed LWTF, including any sensitive premises (e.g., schools, preschools, hospitals, nursing homes) are listed below:

Table 4. Notification of relevant authorities contact details

Neighbouring premises	Contact number	Email address
Ameers & Sons Traders Pty Ltd 1 Long Street, Smithfield NSW 2164	0416 856 363 0470 332 873	Khan_safi15@yahoo.com
Boral Concrete Smithfield 2 Long Street, Smithfield NSW 2164	1300 552 555	
Caslec Electrical & Data 3 Long Street, Smithfield NSW 2164	1300 659 273 (02) 9604 4488	service@caslec.com.au
A1 Budget Auto Dismantlers 5 Long Street, Smithfield NSW 2164	(02) 9725 5922	
Studio Leather & Fabrics 1/5 Long Street, Smithfield NSW 2164	1300 156 576 (02) 9756 0039	service@studioleather.com.au
Hertz Truck Rental 6 Long Street, Smithfield NSW 2164	(02) 9609 4664	reservations@hertztrucks.com.au
Thrifty Car Rental 6 Long Street, Smithfield NSW 2164	136 139	
Demast Pty Ltd 7 Long Street, Smithfield NSW 2164	(02) 9756 0214 0400 525 796	info@demast.com.au
Total Car Removal 9 Long Street, Smithfield NSW 2164	0468 561 565	info@totalcarremovals.com.au
Alderton Motorcycle Repairs 2/10 Long Street, Smithfield NSW 2164	(02) 9609 2889	
Dyno Tune Sydney 3a/10 Long Street, Smithfield NSW 2164	1300 888 793	office@dynotunesydney.com.au
Mainalign Suspension & Mechanical 4/10 Long Street, Smithfield NSW 2164	(02) 9604 8155	admin@mainalign.com.au
Jones & Rickard Group and Magnetics 11 Long Street, Smithfield NSW 2164	(02) 9609 4644	info@jonesandrickard.com.au
Envirocut Concrete Sawing & Coring 12 Long Street, Smithfield NSW 2164	0416 731 215	info@envirocut.com.au
Wanless Waste Management 13 Long Street, Smithfield NSW 2164	1300 926 537	
A1 Concrete Services 14 Long Street, Smithfield NSW 2164	(02) 9644 9488	enquiry@a1concreteservices.com.au
Unoccupied – Contact Wetherill Park Industrial Real Estate	(02) 9725 3355	

Table 4. Continued…

Neighbouring premises	Contact number	Email address
Conveyor and Plant Services 18 Long Street, Smithfield NSW 2164	(02) 9725 2152	admin@conveyorandplant.com.au
Zifam Pinnacle Pty Ltd 20-24 Long Street, Smithfield NSW 2164	(02) 9729 3863	info@zifampinnacle.com.au
Southern Globe Pty Ltd 3 Tait Street, Smithfield NSW 2164	(02) 9729 2275	southernglobe@outlook.com
Sydney Cleaning Cloths 3 Tait Street, Smithfield NSW 2164	(02) 9729 0861 0422 344 744	sydneycloths@outlook.com
Simons Seconds 4 Tait Street, Smithfield NSW 2164	(02) 9729 4483 1300 746667	
iPave 4 Tait Street, Smithfield NSW 2164	(02) 9756 1848	
Letizza Bakery 5-7 Tait Street, Smithfield NSW 2164	(02) 9725 3622	
Kwikfix Mechanical Pty Ltd 6-8 Tait Street, Smithfield NSW 2164	(02) 9756 1506	admin@kwikfixmechanical.com
KWN 9-11 Tait Street, Smithfield NSW 2164	1300 596 596	accounts@kwn.com.au
Leased by Demast Pty Ltd 12 Tait Street, Smithfield NSW 2164	(02) 9756 0214 0400 525 796	info@demast.com.au
Core Driving School 14 Tait Street, Smithfield NSW 2164	1800 00 2673	info@coredrivingschool.com.au
Recently sold 16-18 Tait Street, Smithfield NSW 2164	TBC	
Sensitive receptors	**Contact number**	**Email address**
Tait Street Park / Soccer Fields Corner Tait and Long Streets, Smithfield NSW 2164	(02) 8757 9000	council@cumberland.nsw.gov.au

In the event that an incident occurs, and the incident is being managed by emergency services (NSW Police/ and or Fire & Rescue), the incident controller will notify the local community. The site manager/ or general manager must coordinate with the incident controller on what community notification, if any, should be undertaken. The following information must be provided to the incident controller:

- Licence name, telephone contact details
- Time, date, duration, nature, and location of the incident
- Location of the place where pollution is occurring or is likely to occur
- The nature, the estimated quantity or volume and the concentration of any pollutants involved (if known at the time)
- Circumstances in which the incident occurred, including the cause of the incident (if known at the time)
- Actions taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution (if known at the time)
- Any other information requested by the incident controller (if information becomes available at a later stage, that information must be provided to the incident controller as soon as possible).

Early warnings to the direct community will be performed by Demast, in consultation with the incident controller and/ or the local council authority, and consist of the following notification methods:

- Telephone calls, emails, or door knocking (where appropriate)
- Mailbox drops
- Warning signs
- Local media source (radio/newspapers/social media)
- Council webpage updates and media releases
- Demast webpage updates

6 Description and likelihood of hazards

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

Potential hazards to human health or the environment may include:

- Water contamination
- Waste contamination
- Dust and odour emissions
- Land contamination
- Noise pollution
- Fire

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

Table 5. People, environment, community, and asset hazard/ impact risk matrix calculator

Risk Assessment		**Likelihood**				
Consequence *(refer to table below for descriptors)*		**Rare** *1 in 10,000 The event may occur only in exceptional circumstances*	**Unlikely** *1 in 1000 The event could occur at some time*	**Possible** *1 in 100 The event should occur at some time*	**Very Likely** *1 in 10 The event will probably occur in most circumstances*	**Almost Certain** *Almost 1 in 1 The event is expected to occur in most circumstances*
		1	**2**	**3**	**4**	**5**
Insignificant	**1**	**1**	**2**	**3**	**4**	**5**
Minor	**2**	**2**	**4**	**6**	**8**	**10**
Moderate	**3**	**3**	**6**	**9**	**12**	**15**
Major	**4**	**4**	**8**	**12**	**16**	**20**
Catastrophic	**5**	**5**	**10**	**15**	**20**	**25**

Table 6. Consequence descriptors					
Descriptor	**Financial Impact Loss of Profit**	**Quality Impact**	**People Impact**	**Environmental Impact**	**Legal Ramifications**
Insignificant	Less than $1k	Internal rework	First Aid No lost time	Minor contamination No harm	Minor breaches No fine/s
Minor	Between $1k - $10k	Minor rework	Injury/Illness LTI 1-10 days MTI	Minor harm Hrs for recovery	Minor breach minimal fine/s
Moderate	Between $10k - $100k	Short term interruption Day/s	Injury/Illness LTI 10 days +	Moderate harm Days for recovery	Moderate breach, fine/s possible
Major	Between $100k - $1m	Short term interruption 1 week – 1 month	Major Injury/ Incapacitation	Major harm Months for recovery	Major breach of regulation and major litigation
Catastrophic	Greater than $1m	Long term interruption 1 month +	Fatality / Permanent Incapacitation	Irreversible harm, Permanent damage	Significant prosecution/fines

Water contamination:

Risk score: 6

Likelihood: Possible

Consequence: Minor

Description:

In accordance with the POEO Act (1997), Demast manage surface water and stormwater onsite. The LWTF operates a first flush system permitted by Sydney Water. The first flush system is designed to collect and treat the first 10 mm of rainfall captured across the stormwater control area and directs the rest of the water to the stormwater drainage system.

The Demast LWTF is a water positive system, the water received at the facility through disposal of liquid waste and the water retained through the first flush system is processed through the treatment facility and reused to wash and separate liquid waste into solid fractions. Excess water is disposed off-site into the sewer system under a Sydney Water trade waste agreement when the water storage tanks reach capacity.

The primary water quality controls that are currently implemented at the site (LWTF) are:

- Source controls – include covering and enclosure of waste sorting and processing areas, regular cleaning of hardstand areas (street sweeper at least twice daily and as required), appropriate storage of hazardous materials, urethane floor bunding, tanks bunded to 110% of their maximum capacity, high level warning alarms fitted to internal tanks, shut of valves fitted to all tanks, and installation of EnviropodTM stormwater pit baskets within all stormwater pits.
- Water management – Rainwater collected on shed roofs is directed to the stormwater drainage system. Central yard stormwater runoff drains to open grids and into the first flush holding tanks (10 kL). The first 10mm of rainfall in a 24-hour period is then transferred to the treatment facility followed by the sewer system. This is controlled by rain activated control panel with tipping bucket rain gauge or rain sensor to delay discharge of first flush stormwater to treatment facility for at least one hour after rain stops.
- Water treatment – Demast operate a liquid waste treatment facility. Water transferred from the first flush holding tanks to the treatment facility is processed via a series of washing and vibrating screens, and clarifier systems.
- Wastewater management – the site is connected to the regional sewer system. Treated water is either reused within the treatment facility or disposed of to the sewer under a Sydney Water trade waste agreement. Sampling and analysis of the wastewater disposed of to the sewer is undertaken at least every 60 days as required by the trade waste agreement.

As result of the implementation of the control measures, the risk of water contamination is considered low.

Waste contamination:
Risk score: 4
Likelihood: Unlikely
Consequence: Minor
Description:
As per the NSW EPA Environment Protection Licence 20875 section L2.1 states any waste received at the premises is subject to the waste description, activity and limits listed in 'Other Limits' of the EPL. Section O5 states, any waste for processing or storage at the premises must be assessed and classified in accordance with the EPA Waste Classification Guidelines and is to be confined within the buildings and designated areas, including loading and unloading.

To prevent the risk of cross contamination via plant and equipment, all plant and equipment is to be decontaminated and free of debris prior to entry/exit of designated area.

Contaminated waste and generated waste must be classified, transported and disposed/ reused off-site lawfully in accordance with relevant legislation and EPA endorsed guidelines or documents.

Dust and odour emissions:
Risk score: 4
Likelihood: Unlikely
Consequence: Minor
Description:
As per the NSW EPA Environment Protection Licence 20875 section L4.1 no condition identifies a potentially offensive odour for the purpose of section 129 of the POEO Act (1997) and section O3 states the premises must be maintained in a condition which prevents the emission of dust and tracking of material from the premises. As a result the following control measures have been implemented at the LWTF:

- All onsite roads and car parking areas are sealed with concrete, asphalt and/or road base
- All material loading and unloading is undertaken within an enclosed building
- Idling of trucks must be minimised where possible
- No materials are stored outside with the exception of palletised bagged and sealed processed material. The weight of the palletised bagged and sealed processed material stored outside does not exceed 50 tonnes at any one time

The following additional measures have been implanted at the LWTF:

- Any new equipment purchased for site must meet the Euro V emission standards
- All plant and equipment are regularly serviced and maintained to meet manufacturer's emissions specifications
- Central yard, and roadways are routinely swept twice a day with a street sweeper and monitored by the onsite traffic controller
- The LWTF accepts liquid waste, and processing waste using water treatment techniques and therefore no dust emissions are generated as the LWTF is a water positive treatment facility
- Fenced boundaries greater than 2m.

As result of the implementation of the control measures, the air quality risk of contamination is considered low.

Land contamination:
Risk score: 4
Likelihood: Unlikely
Consequence: Minor
Description:
As the entire central yard is covered in concrete hardstand, there is currently no access to surface or subsurface soil materials and therefore no requirement to mitigate contaminants of potential concern to land. At no stage are imported soils applied to the land within the site's boundary. The LWTF does not accept materials that are restricted, or hazardous. Fuel, oils, dangerous goods or other potential contaminants are managed in accordance with relevant legislation, manufacturer's instructions, Safety Data Sheet (SDS) and the relevant Safe Work Method Statements.

Noise pollution:
Risk score: 2
Likelihood: Unlikely
Consequence: Insignificant
Description:
As per the NSW EPA Environment Protection Licence 20875 section O5.5 the licensee must implement measures to limit the noise impacts of reverse tones of on-site plant, in order to reduce the effects of sleep disturbance on the neighboring community. As a result, the following control measures have been implemented at the LWTF:

- All plant onsite are fitted with squawkers and not reversing beepers
- Majority of plant is operated within the partially enclosed sheds at the LWTF
- Residential properties are not located within close proximity.

Fire:
Risk score: 8
Likelihood: Unlikely
Consequence: Major
Description:
In the unlikely event that a fire occurs at the LWTF the following control measures have been implemented:

- Passive fire protection system
- Electrical equipment is tested and tagged
- The use and storage of fuels, oils and dangerous goods will be strictly in accordance with relevant legislation, manufacturer's instructions, SDS and the relevant Safe Work Method Statements
- Emergency response materials such as fire extinguishers, fire hoses, oil spill kits, absorbent materials, sandbags, will be readily available and kept clear in designated areas for easy accessibility
- Systems shut off valves installed
- No smoking policy in buildings.

7 Pre-emptive actions to be taken

Pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the LWTF site:

- Daily maintenance procedures of LWTF and equipment
- Bunding of waste, chemical and liquid storage areas and/ or tanks
- Emergency stop controls
- Alarms/ notification systems when LWTF is not performing as required
- CCTV and security monitoring systems
- Development, use, and maintenance of standard operating procedures
- Install and maintain safety equipment and storage of supplies for combatting an incident, e.g. spill containment kits, fire extinguishers, fire hoses etc.)
- Audits and inspections of systems and procedures
- Reporting near misses
- Implementation of any environmental management plans, stormwater management plans, and/ or waste management plans as required.

8 Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:
Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Table 7. Inventory of pollutants

Contents/ Pollutant Name	Location on-site	Maximum quantity	Comments
Flocculant	Chemical storage	2000 L	Used in wastewater treatment
Coagulant	Chemical storage	2000 L	Used in wastewater treatment
Sulphuric acid	Chemical storage	1000 L	Used in wastewater treatment

9 Safety equipment

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

Table 8. Safety equipment

Item No.	Equipment	Location/s	Comments
1	Portable Eye wash station	Main office lobby Filter press plant Shed 1	
2	First aid kits	Main office lobby Shed 1 Trucks 1, 2, and 3	Contents should be replaced when out of date, or immediately after use
3	2-way radio	Main office Traffic controller in yard Plant operators Excavators 1, and 2 Loaders 1, and 2	
4	Email/phone	Main office	
5	Spill kit	Main building	Products should be kept clear, maintained and inspected after use
6	Clean sweep absorbent material	Main building	Products should be kept clear, maintained and inspected after use
7	Fire extinguishers	Main building Shed 1 Trucks 1, 2, and 3	Fire extinguishers should be kept clear, maintained and within the expiry date at all times
8	Fire hoses	Main building (3x)	Fire hoses should be kept clear, maintained and inspected periodically
9	Fire Hydrant	Footpath north of 18 Long Street, Smithfield NSW 2164	Fire hydrants should be kept clear, maintained and inspected periodically
10	Traffic control signage	Main yard Safety signage (main building, weighbridge)	
11	PPE, protective gloves, hard hats	Main office lobby	Appropriate PPE should be worn at all times, specific PPE should be worn as per safety data sheets
12	Safety data sheets	Main office lobby Attached to chemical	Hard copies to be kept with chemicals stored on site and soft copies on file

10 Communicating with neighbours and the local community

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

In the event of a pollution incident occurring which has the potential to impact neighbours and the local community, communication methods will be used on a case-by-case basis and in all situations Demast will liaise with the incident controller to provide early warnings to directly affected neighbouring properties and local communities by the mechanisms described above in section 5.

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

Early warnings are to include details of what the imminent incident is (as known at the time) and how those affected can prepare and respond to the incident. The notification shall provide specific information to the neighbouring properties and local communities, so it can minimise the risk of harm to their health and property during and after the incident.

Follow up communications with the neighbouring properties and local communities will be carried out by the Demast directors. Notification may involve the following:

- Instructions to close windows and doors and remain inside to avoid emissions of certain types of air pollutants (especially for asthmatics)
- Evacuation of premises
- Avoiding use of water for consumption or recreation in creeks, rivers, or groundwater likely to be affected by a pollutant discharge or spill.

11 Minimising harm to persons on the premises

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

All staff and contractors are to be inducted before completing any work on site. The induction includes procedures for minimising the chance of a pollution incident occurring, managing a pollution incident and actions following a pollution incident.

Minimising the impact to persons at the Demast LWTF site during a pollution incident is the highest priority. The site is to establish site-specific details which are to include relevant emergency protocols including evacuation procedures, evacuation meeting points, medical emergency procedures and environmental incidents. A site emergency response list which details the sites emergency controller, fire warden and other relevant emergency contact details is to be maintained at the LWTF site. Additionally, as part of the preparations for the PIRMP, training and drills will be undertaken with relevant staff, employees, and contractors (refer Sections 15 and 16).

12 Maps

The following maps are provided in Appendix I – Figures:

- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of emergency response equipment
- location of any stormwater drains on the premises.

13 Actions to be taken during or immediately after a pollution incident

Actions during and after a pollution incident

In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the sites excavation procedures and follow the directions of site personnel. All staff are informed on the location of muster locations through site inductions, signage and ongoing training.

Licensees are required to report pollution incidents **'immediately'** (without delay) to the relevant regulatory authorities. In the event of a pollution incident, the person who has identified the incident should immediately contact the site manager.

The person reporting the pollution incident should provide the following key details:

- Their name and contact details
- Location of the pollution incident/emergency
- Nature of the pollution incident/emergency
- Details of any assistance required.

Some general controls for managing a pollution incident include:

- Visually assess the situation. Undertake emergency response if required
- If safe to do so, contain the spill using the spill kit material
- Contact the appropriate regulatory authorities in accordance with the PIRMP
- If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident (i.e., mobilise vacuum tanker to site, apply spill response material to the incident area or utilise fire extinguishers onsite)
- Take direction from the appropriate regulatory authorities as required
- Notify neighbouring premises and local communities as required
- If required seek assistance from specialist consultants/contractors.

Actions required following the pollution incident

A detailed incident investigation and report will be completed regarding the pollution incident to find the root cause of the incident and implement the corrective actions to prevent the incident occurring. The incident will be reported in the

internal management system. If Demast are notified of the pollution incident by the public, a complaint will also be registered in the internal management system and reported on the licence annual return.
Within a month following the incident, the PIRMP will be reviewed and tested. Demast will continue to liaise with the relevant regulatory authorities to reduce the likelihood of the pollution incident reoccurring.

The Incident will be discussed at a toolbox meeting with all staff and contractors regarding the incident investigation, key outcomes and follow up on the completion of the corrective actions

Clean-up of a pollution incident should be undertaken as soon as practicable and safe to do so by appropriate contractors/ sub-contractors licenced to perform such cleaning operations. Demast are to ensure appropriate insurances are in place to cover any significant costs associated with the clean-up of a pollution incident.

14 Coordinating with persons

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

Licensees must notify all of the appropriate regulatory authorities following a notifiable incident as outlined in Section 4. The licensee is required to coordinate with the incident controller during, and following the incident.

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

As outlined in Section 3 of the PIRMP, notification of the incident to relevant authorities is to be provided by a person with an appropriate level of authority within the company, either a director or manger of the licensee.

15 Staff training

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

Pollution incident awareness training will be provided to all personnel through the induction process and site toolbox talks to ensure awareness of site pollution requirements and commitments. Nominated staff will be trained in emergency management, including the implementation and enactment of this PIRMP. Trained staff will be able to follow procedures and ensure that fires are controlled quickly without harm to individuals and that the site can be evacuated in a timely, safe, and calm manner. Trained staff will understand the processes for communication with emergency services and will be able to follow any instructions provided by emergency services relating to safety of individuals and security of the site.

All LWTF employees will be provided with spill management training incorporating the use of spill kits. All LWTF employees will be able to manage, and controls spills and / or other unexpected chemical releases quickly and effectively, ensuring no damage to the environment or harm to individuals occurs. All LWTF employees will be aware of and understand the requirements of this document (PIRMP).

Records of employees being trained in the execution of this plan are retained in the site training matrix, training records folder, as well as personnel files.

16 Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident. The testing 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 that each plan is capable of being implemented in a workable and effective manner. Testing may include:

- Desktop scenarios
- Physical Scenarios.

Testing records will be maintained electronically on the file and updated below in Table 9.

PIRMPs for mobile plant licences will need to be updated when a plant moves location, to ensure the PIRMP meets the requirements set out in the legislation. Following a change in location, all components of the PIRMP should be reviewed and updated as necessary. This includes the inventory of pollutants used to carry out the activity, contact details for the relevant local authorities, communicating with the neighbouring community, the location of sensitive receivers in the surrounding area, and maps of the new location where the activity is taking place.

Table 9. PIRMP testing details

Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
20/05/2022	Fearghal McNulty/ Paddy Gavin	Simulated coagulant spill	Executed correctly/ PIRMP to be updated to individual format	May 2023
04/05/2023	Fearghal McNulty/ Paddy Gavin	Simulated Liquid waste spill	Executed correctly/ PIRMP to be updated to individual format	May 2024

Table 10. PIRMP update details

Date update occurred	Reason for update	Details of updates	Date the updated version uploaded to website (if applicable)	Date of completion
08/09/2022	New format	PIRMP document updated	TBC	08/09/2022

17 References

1) NSW EPA Guideline: Pollution Incident Response Management Plans 2020
2) Environment Protection Licence 20519
3) Protection of the Environment Operations Act 1997 (Cth.) (Austl.)
4) Protection of the Environment Operations (Waste) Regulation 2014 (Cth.) (Austl.)
5) Protection of the Environment Operations (General) Regulation 2009 (Cth.) (Austl.)
6) Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012
7) Privacy and Personal Information Protection Act 1998
8) Work, Health and Safety (WHS) Regulation 2017

18 Limitations and disclaimer

This report has been prepared for the exclusive use of the licensee and is limited to the scope of the work agreed in the terms and conditions of contract (including assumptions, limitations and qualifications, circumstances, and constraints). ADE has relied upon the accuracy of information and data provided to it by the Demast and others.

ADE has used a degree of care and skill ordinarily exercised in similar projects by reputable members of the environmental industry in Australia. No other warranty, expressed or implied, is made or intended. No one section or part of a section, of this plan should be taken as giving an overall idea of this plan. Each section must be read in conjunction with the whole of this plan, including its appendixes and attachments. The plan is an integral document and must be read in its entirety.

To the fullest extent permitted by law, ADE does not accept or assume responsibility to any third party (other than the client) for the plan or the opinions given.

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ADE's professional opinions are based upon its professional judgement, experience, training, and results from analytical data. In some cases, further testing and analysis may be required, thus producing different results and/ or opinions.

This Limitation and Disclaimer must accompany every copy of this plan.

Appendix I – Figures

REGIONAL MAP
SOURCE: http://www.whereis.com/

LEGEND

SITE BOUNDARY

NOTE:
ALL LOCATIONS ARE APPROXIMATE
DIMENSIONS IN METRES.

AERIAL IMAGE SOURCE: MAPS.AU.NEARMAP.COM, 17 OCT 2021.

revision	no.	description	drawn	approved	date
	A	FIRST ISSUE	MC	CM	08/09/22

0 10 20 30 40 50
SCALE 1:1000 @A3 METRES

drawn	MC
approved	CM
date	08/09/2022
scale	AS SHOWN
original size	A3

client: DEMAST PTY LTD

project: EPL 20875 PIRMP
7 LONG STREET, SMITHFILED, NSW

title: SITE LAYOUT AND SITE LOCATION PLAN

project no: EPL20875.PIRMP1.V1F | figure no: FIGURE 1 | rev: A

ADE CONSULTING GROUP
Sydney Office
ADE Consulting Group Pty Ltd
Unit 6 / 7 Millennium Court, Silverwater, NSW 2128
www.ADE.group | info@ade.group | 1300 976 922

PLOT DATE: 08/09/2022 09:55:06 DWG FILE: W:_NEW DELTEK PROJECTS ENV\21.1537 DEMAST (SMITHFIELD) MTI\6-WORKING DOCUMENTS\4-CAD (MC)\21.1537.DWG

Figure taken from Land Insight Environmental Screen Report

drawn	MC	client:	DEMAST PTY LTD
approved	CM	project:	PIRMP EPL 20875 7 LONG STREET, SMITHFIELD NSW
date	08/09/2022		
scale	AS SHOWN	title:	URROUNDING AREA LIKELY TO BE AFFECTED BY A POLLUTION INCIDENT PLAN
original size	A3	project no: EPL20875.PIRMP1.V1F	figure no: FIGURE 2

0 6 12 18 24 30
SCALE 1:600 @A3 METRES

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Unit 6 / 7 Millennium Court, Silverwater, NSW 2128
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Legend:

	Gas storage/ Gas Under Pressure
	Corrosive
	Low Level Toxicity/ Irritant
	Flammable liquids
	High Level Toxicity and Long-Lasting Effects to Aquatic Life
	Bunded Area

N

0 6 12 18 24 30

SCALE 1:600 @A3 METRES

drawn	MC	client:	DEMAST PTY LTD
approved	CM	project:	PIRMP EPL 20875 7 LONG STREET, SMITHFIELD NSW
date	08/09/2022		
scale	AS SHOWN	title:	POTENTIAL POLLUTANTS PLAN
original size	A3	project no: EPL20875.PIRMP1.V1F	figure no: FIGURE 3

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Sydney Office
ADE Consulting Group Pty Ltd
Unit 6 / 7 Millennium Court, Silverwater, NSW 2128
www.ADE.group | info@ade.group | 1300 976 922

Legend:

	Evacuation Assembly Point
	First Aid Post + AED + Eye Wash Station
	HAZMAT Spill Kit
	Fire Hydrant Access
	Fire Hose Reel + Fire Extinguisher
	Fire Extinguisher
	Bunded Area

0 6 12 18 24 30
SCALE 1:600 @A3 METRES

drawn	MC	client:	DEMAST PTY LTD	
approved	CM	project:	PIRMP EPL 20875 7 LONG STREET, SMITHFIELD NSW	
date	08/09/2022			
scale	AS SHOWN	title:	EMERGENCY RESPONSE EQUIPMENT PLAN	
original size	A3	project no:	EPL20875.PIRMP1.V1F	figure no: FIGURE 4

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Unit 6 / 7 Millennium Court, Silverwater, NSW 2128
www.ADE.group | info@ade.group | 1300 976 922

Legend:

■	Closed Pit
▯	Grated Pit
→	Drain & Flow Direction
○	10KL First Flush Stormwater Tank
▭	Liquid Waste Treatment Facility
	First Flush Rain Sensor
	Discharge Point to Sydney Water Trade Waste
	Slope Direction
	Stormwater Drain Shut Off Push Button
▬	Bunded Area

N

0 6 12 18 24 30

SCALE 1:600 @A3 METRES

drawn	MC	client:	DEMAST PTY LTD
approved	CM	project:	PIRMP EPL 20875 7 LONG STREET, SMITHFIELD NSW
date	08/09/2022		
scale	AS SHOWN	title:	STORMWATER DRAINAGE LINES PLAN
original size	A3	project no: EPL20875.PIRMP1.V1F	figure no: FIGURE 5

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Sydney Office
ADE Consulting Group Pty Ltd
Unit 6 / 7 Millennium Court, Silverwater, NSW 2128
www.ADE.group | info@ade.group | 1300 976 922