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1. Purpose

The Pollution Incident Response Management Plan (PRIMP) applies to all employees, contractors and visitors working at the Kemblawarra site. The PIRMP has been developed to describe SCE Recycling's response to a potential incident and to meet requirements of the Protection of the Environment Operations act (POEO Act 1997). The PIRMP covers South Coast Equipment (Licensee), SCE Processing & SCE Recycling, Lot 1 Shellharbour Road, Port Kembla, Environmental Licence EPL 1265 for resource recovery

2. Scope

SCE Recycling is required to develop and implement a PIRMP in accordance with the Protection of the Environment Operations Act (POEO) 1997, Part 5.7A. The requirements of the plan are:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include relevant information to report incidents and take corrective actions (Section 153C, POEO Act)
- Licensees must keep the plan at the premises to which the environment protection licence relates and is made available (section 153D, POEO Act).
- Licensees must test the plan (Section 153E, POEO Act).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

3. Objectives

The objectives of this plan are 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, WorkCover 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.

In the event of a pollution incident:

Step 1: Emergency Response: Ensure personnel are safe.

Step 2: Emergency Response: Contain the incident where possible.

Step 3: Notify relevant personnel including the Operations Manager, Divisional Manager & the Managing Director

Step 4: Operations to complete the notification required if the pollution incident meets the definition

4. References

- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations Regulation (General) 2009
- Environmental Guidelines: preparation of pollution incident response management plans (NSW EPA 2020).
- SCE Recycling Emergency Procedures

5. Definitions

Pollution Incident 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.

Material Harm involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or 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).

6. Responsibilities

The following personnel are responsible for the PIRMP;

6.1. Operations Manager

- Activating the plan and managing the plan
- Notifying and co-ordinating relevant authorities
- Managing the response to a pollution incident
- Reporting the incident into SCRIM, HSEQ database
- Audit and monitor compliance with this procedure
- Identify and implement remedial corrective actions required to meet this procedure
- Ensure all workers are trained in the PRIMP
- Ensure spill kits are inspected and maintained

6.2. HSE Superintendent

- Implementation and management of this document
- Support the Operations Manager to manage the response to a pollution incident
- Audit and monitor compliance with this procedure
- Identify and implement remedial corrective actions required to meet this procedure

6.3. All workers

- Comply with this procedure
- Report all pollution events, however minor they may be

7. Pollution Incident Hazards

SCE Recycling is not a classified hazardous facility. However, there are substances and activities undertaken on the site that if not controlled adequately could pose a risk to the environment. The following section outlines the management procedures for pollution incident response management. The protocol is split into three sections:

- 1) Eliminating and/or avoiding generation of pollution
- 2) Management of pollution incidents
- 3) Improving and reviewing Pollution Incident Response Management Plan

7.1. Environmental Impact and Hazard Register

In order to effectively plan for a potential pollution event, a register of environmental hazards has been created. Each hazard has been assessed in accordance with the SCE Recycling Environmental Risk Matrix (see Table 1 below).

The hazards have been grouped in according to the area of environmental impact. By identifying these hazards ahead of time, mitigation measures can be identified and implemented through site procedures to minimise the risk of a pollution event occurring. These have been listed in table 2 below.

Table 1: SCE Recycling Environmental Matrix

		High likely is it to be that bad?			
		E - Very likely	F - Likely	G - Unlikely	H - Very unlikely
		Could happen any time	Could happen sometime	Could happen but very rarely	Could happen, but probably never will
How severe are consequences?	A - Permanent Environmental Damage on Community &/or Breach Client Environmental Licence Condition	1	1	2	3
	B - Permanent Environmental Damage Localised	1	2	3	4
	C - Environmental Damage leaving damage up to 12 months	2	3	4	5
	D - No damage or Environmental Impact, but cleaned up - No Scars	3	4	5	6

Risk Level	
High	1
Medium	2-3
Low	4
Very Low	5-6

Table 2: SCE Recycling Environmental Matrix

Hazard Ref.	Aspect of Business That May Adversely Impact the Environment	Adverse Impact on the Environment	Uncontrolled			Controls Required to Eliminate or Reduce the Environmental Impact	Controlled			Emergency Response - In the event that controls fail	LAWWN	Functions Responsible
			Consequence	Likelihood	Risk Rating		Consequence	Likelihood	Risk Rating			
1	Spillage of product on roads – client property or public property.	Potential impact to adjacent habitats or waterways. Loss of control may lead to a Non Conformance for customer and/or SCE	C	E	2	Tail gates of trucks regularly inspected Mudlocks fitted to tailgates where necessary Supervision of work areas and materials to monitor operations and risk of spillage Trucks not overloaded Loads secured and covered No loading of unsuitable truck bodies	C	H	5	Drivers trained to notify supervisor immediately of any spillage. Spillage cleaned up immediately under guidance of SCE Recycling Supervisor or client. Daily Inspection Checklist and audits	Land - Water - Air	Steelstone Manager
2	Dust and material driven off site caused by SCE Recycling trucks. Fugitive Air Emissions	Contamination to air. Potential impact to adjacent habitats or waterways. Loss of control may lead to a breach to SCE resources Environmental Licence. Loss of control may lead to a Non Conformance from OneSteel	C	E	2	Water cart used to suppress dust when required. Water sprays used on stockpile areas when required. Road sweeper used to clean up dust on sealed road when required. All trucks to use truck wash when exiting site. Silt bags and sand bags to be positioned around storm water drains Activities which have the potential to generate dust have been identified. Audits and Inspections Review incident reports Equipment fit for purpose Training system in place All significant dust emissions are reported	C	G	4	Drivers and operators trained to inform supervisor of any spillage. Drivers report all spillages to supervisor. Supervisor contains and cleans up spillages immediately. Daily Inspection Checklist and audits	Land - Air - Water	Steelstone Manager
3	Bulk Oil and fuel storage area for new and used tanks and drums	Potential for Spill and ground contamination of surrounding area.	C	G	4	Fully bunded area. Drums stored on bunded pallets Area fully under cover. Secure storage. Drained/Inspected regularly. Risk assessment of all oils/grease etc. SDSs.	C	H	5	Personnel trained in spill response. Spill equipment positioned in yard and sign posted	Land - Water	Steelstone Manager
4	Disposal Of Waste Material and Product. 1. Oil 2. Oil Filters 3. Tyres 4. Batteries 5. Coolant And Oily Water 6. Parts Cleaning Waste 7. Ferrous And Non Ferrous Scrap	Potential to contaminate the local environment. Potential breach to SCE Resources Environmental Licence.	C	F	3	Oil is collected and contained. Disposed by Maintenance Contractor. Used oil filters collected/disposed of by Maintenance Contractor. Old and worn tyres are disposed of through supplier. Used batteries are collected/disposed of by Maintenance Contractor. Waste Coolant and Oily Water is collected and contained disposed of by Maintenance Contractor. Parts are cleaned over a drum. Waste is collected and of by Maintenance Contractor. Waste Metal is collected and disposed of in scrap metal bins. Contractor Management Systems	C	G	4	Personnel trained in spill response. Spill equipment positioned in yard and sign posted	Land - Water - Waste	Steelstone Manager
5	Refuelling and general servicing activities in SCE recycling yard, plant serviced and refuelled in yard and workshop	Oil or diesel spill, ground contamination of surrounding area. Material run-off into waterway	B	G	3	Cut-off pumps fitted to diesel re-fuellers. Refuelling SWP SCER-035. Fuel Spill SWP SCER-035.	D	F	4	Spill kit on site. Personnel trained in spill response	Land - Water	Steelstone Manager
6	Oil or fuel spillage	Oil or diesel spill, ground contamination of surrounding area. Material run-off into waterway	B	F	2	Maintenance of equipment Correct storage of oils - spill pallets.	B	H	4	Spill kit fitted in storage container. Personnel trained in spill response	Land - Air - Water	Steelstone Manager
7	Dust emissions from SCE Recycling operations	Contamination to air	C	E	2	Regular auditing of yard Daily Inspection Checklist Review weather conditions Water cart used when required to suppress dust. Yard is regularly graded as required. Water sprays used on stockpile and yard Sprays on crushing plant and screening plant	C	G	4	Reporting procedures in place. Procedure includes response requirements.	Air	Steelstone Manager
8	Fuel emissions from SCE Recycling plant	Contamination to air	D	G	5	Regular auditing of yard Daily Inspection Checklist Maintenance of equipment as per OEM recommendation Report when visual emissions are present.	D	H	6	Reporting procedures in place. Procedure includes response requirements.	Air	Steelstone Manager

7.2. Description and Likelihood of Hazards

Potential pollution incidents identified include;

Air Pollution Incident	Escape of significant dust or smoke to atmosphere
Water Pollution Incident	Escape of significant sediment, oil, grease, fuel off site to a watercourse
Noise Pollution Incident	Noise only pollution is not included as a notifiable incident
Land Pollution Incident	Escape of significant sediment, oil, grease, fuel off site to land

The Licensed Site has current EPA Environmental Risk Level 1. The licensed site covered by this plan was assessed by individual risk assessments. The controlled nature and permitted operation under the licence at the site, Non-thermal treatment of general waste, Waste storage – Other types of waste, currently presents low risk. There is waste processing associated with the licence. The residual risks from the risk assessment are tabled below

Site / Residual Risk	SCE Recycling
Air Pollution Incident	Low
Water Pollution Incident	Low
Noise Pollution Incident	Low
Land Pollution Incident	Low

8. Pre-emptive Actions

There are several pre-emptive actions employed for each potential environmental pollution risk.

Dust event

- sealed entrance road
- water cart to provide additional dust suppression as required
- stockpile dust is controlled with water sprinklers
- all crushing and screening plant have water sprays to mitigate dust emissions
- road sweeper is scheduled to clean entry and exit roadways on a regular basis
- all vehicles exiting site use truck wheel bath and cobble material to remove dust/dirt from tyres
- dust is monitored via the Daily Environmental Checklist
- audits and observations

Sediment Run Off

- the fall of the land is designed such that all water is directed to the dish drains
- all water used in the truck wash bay is recycled and used for dust suppression on site
- audits and observations

Oil, Grease & Fuel Systems

- all oiling, greasing and fuelling of plant and equipment is carried out on site in accordance with the relevant safe work procedure
- Appropriate bunding
- spill kits
- audits and observations

9. Inventory of Pollutants

Pollutant	Use	Maximum Quantity Amount
Construction and Demolition Waste Recovery Stockpiles	Crush and re-use	150 000 tonnes
Diesel	Mobile and Stationery Equipment Fuel	4,800 Litres
Engine Oil	Machine Maintenance	200 Litres
Hydraulic Oil	Machine Maintenance	600 Litres
Grease	Machine Maintenance	180kg

All chemical storage location is bunded.

A folder of all applicable SDS's are stored in the workshop area and office.

10. Safety Equipment

Safety Inventory	Quantity	Location/s
Large Spill Kit	1	Near Diesel Tank
Portable Spill Kit	1	Operations Managers Office
Fire Extinguishers	40	Office, Crib Room, Workshop, All Mobile Plant

The Safety Equipment locations are also shown on the site map, see Attachment 1

PPE is supplied to all personnel and additional PPE is located in the office. Plant and equipment are available to create additional bunding in the event of significant sediment runoff or a fuel spill using material available on site. Any material used for bunding will be assessed in accordance with the Waste Classification Guideline for appropriate disposal.

11. Contact Details

The following table outlines the personnel responsible for the site:

Title	Contact
Operations Manager	0429 551 150
Divisional Manager	0408 238 906
Managing Director	0413 742 814
HSE Superintendent	0407 467 561
Weighbridge	02 4274 9077

The weighbridge is always manned during operating hours. If the above personnel cannot be contacted, the weighbridge operator will be able to contact the appropriate personnel in their place.

12. Notification of external parties

The following table outlines the contact details and correct sequence for notification in the event of a notifiable pollution incident. The Operations Manager will, after notifying, the Divisional Manager of the intent, carry out the notifications required in the table below.

Emergency Services (if dealing with an emergency of immediate threat to human health or property)	Police, Fire, Ambulance	000
	Fire and Rescue NSW N.B. If 000 was called, Fire and Rescue NSW do not need to be contacted again	1300 729 579
EPA	Environment Line	131 555
Public Health Unit	Wollongong Hospital	02 4221 6700
Safework NSW	Notify an Incident	131 050
Wollongong Council	Compliance Services	02 4227 7111

Depending on the Pollution Incident consider notifying;

Sydney Water	Faults and Emergencies	132 090
Department of Planning, Industry and Environment		1300 305 695
Roads and Maritime Services	24-hour traffic enquiry line	132 701

12.1. Communicating with neighbours and local community

In the event of a notifiable incident neighbouring properties will be visited or phoned to advise of the situation.

SCE Recycling's closest neighbours are;

Snare Fabrication	02 4274 1312
Industrial Galvanizers	02 4275 8888
Dean Industries	02 4276 1599
Best Sheds	02 4648 7777

13. Actions during and after incident

- Stop activity
- Remove people from the area, if a safety hazard has been created
- Advise Operations Manager, Divisional Manager and Managing Director
- If it is a spill, contain, control and clean up spill where safe
- Follow Emergency Evacuation procedure i.e. evacuate if required and go to the Emergency Muster Area
- Notify EPA and other external parties as required

Refer to Monitoring dust emissions on site

Refer to SCE Recycling Emergency Procedure

14. Minimising harm to persons on the premises

If it is suspected that an incident may cause material environmental harm the Pollution Incident Management Response Plan will be executed. This action plan is based on seven phases:

Identify

Assess the severity, risks and extent of the incident;

- What is the substance emitted?
- What are the properties of the material? (refer to SDS)
- Is there a risk to health & safety?
- Do you have the necessary Pollution Prevention Response to manage the emission?
- What is the nature of the surrounding area?
- What is the volume of the emission?
- Do you need to implement the Emergency Procedure?
- If the emission has the potential to cause harm, execute the next phase of the plan

Control

- Stop the source of the emission
- Ensure the necessary emergency materials are on hand to control larger emissions e.g. restore drums to upright position, close open valve causing spill, isolate feed line, plug the leak, construct an earthen bund

Contain

- Utilise barriers (absorbent booms, banks of soli or any other objects) or spill absorbent to prevent the emission from spreading
- When an emission is on a hard surface use appropriate absorbent material i.e. absorbent granules or sand
- The main priority is to prevent the emitted material, from discharging off site

Mitigate

- Implement environmental controls downstream of pollution source to prevent/minimise further impact to receiving environment e.g. a fuel spill discharged into a dam. Mitigation controls to ensure this spill is not spread may include closing the weirs, or outlets, ensuring water does not fill from affected dam etc

Clean up

- Clean up and remedial actions to restore the environment
- Disposal of pollutants in accordance with regulations

Report

- Contact key individuals and relevant authorities

Review

- Investigate the event and assist the EPA and investigators with external enquiries
- Complete internal reporting as per SCE reporting requirement
- Test the effectiveness of Pollution Incident response Management Plan annually and one month after the incident to ensure controls are replenished
- Testing protocol is provided in attachments
- Refer to SCE Recycling Emergency Procedures for the site. At all times minimising harm to persons shall be a priority.

15. Maps

The site needs to prepare an emergency response map that provides the following information;

- address of the site
- location of pollutant storage
- location of safety equipment
- emergency evacuation / muster points
- location of SDS
- surrounding area that is likely to be affected by a pollution incident

Refer to attachment 1 and 2

16. Record Retention and Availability

A copy of all SCE recycling pollution incident response records will be recorded in the SCRIM HSEQ database.

The plan is available to all workers and is displayed on site. It is also located on the SCE Website www.sce-aust.com. In addition, a copy will be produced to any EPA Inspector/Officer on request.

17. Training, Testing and Review

There is a very low risk of a pollution incident occurring. It is a legislative requirement for this plan to be tested and updated on an annual basis and within one month of an incident. Testing the plan will be carried out at the time of review or when a Drill is conducted.

To complete this requirement a Pollution Incident Response Test Checklist has been prepared and provided as Attachment 3. The checklist includes the main elements of the plan that require testing;

- Contact numbers
- Evacuation drills
- Desktop assessment
- Staff training and awareness
- Environmental controls & PPE

Desktop assessments require site personnel, responsible for testing the plan, to select a scenario from the Environmental Register (table 2) and ensure that all the required controls for the scenario are in place. During the desktop assessment environmental control and PPE equipment supplies should be inspected to ensure that they are functional and that there are enough materials to ensure that emissions relating to the scenario can be controlled effectively and safely.

All staff will be trained in the PIRMP annually in the form of a Toolbox Talk and records maintained on site.

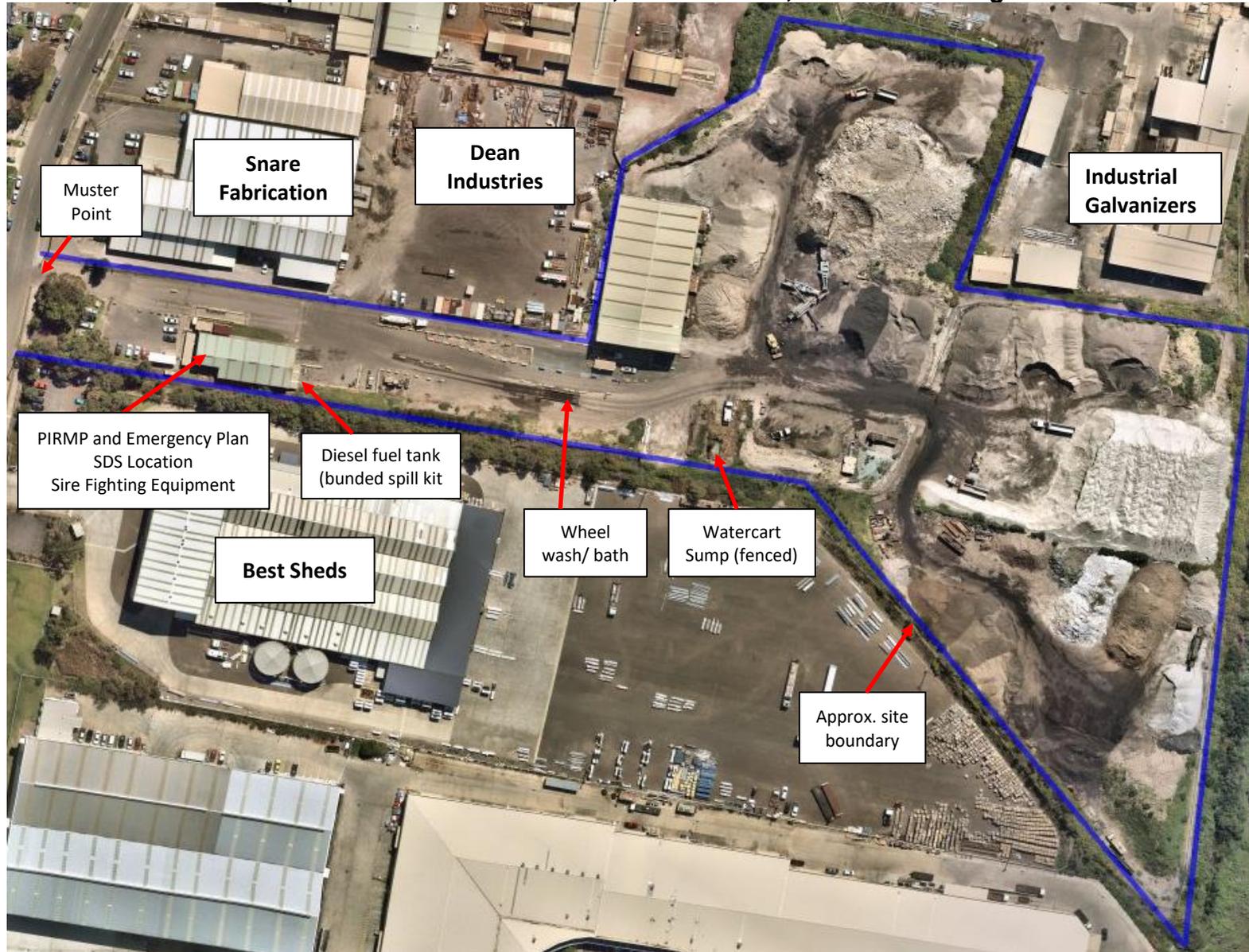
Pollution Incident Response drills are summarised from the current date;

- 20/08/2019 - This was an emergency drill which involved excessive dust leaving site. It was identified that the procedure had current contact details internally or neighbours

18. Revision / Testing History

Revision No.	Doc Review Date	Test Date	Approved By
1	20/11/2013	20/11/2013	Marcus Warner – Operations Manager Rachell Marshall
2	05/01/2015	05/01/2015	Marcus Warner – Operations Manager Rachell Marshall
3	15/02/2016	15/02/2016	Marcus Warner – Operations Manager Rachell Marshall
4	27/03/2017	27/03/20017	Marcus Warner – Operations Manager Rachell Marshall
5	20/02/2018	20/02/2018	Marcus Warner – Operations Manager Rachell Marshall
6	25/01/2019	25/01/2019	Craig Bill – Operations Manager Geoff Mellon – HSE Superintendent
7	27/05/2019	27/05/2019	Craig Bill – Operations Manager Geoff Mellon – HSE Superintendent
8	26/04/2020	26/04/2020	Duncan van Zeyl – Operations Manager Geoff Mellon – HSE Superintendent

Attachment 1 Map: Lot 1 Shellharbour Road, Kemblawarra, and Surrounding Area



Attachment 2 PIRMP Test Checklist

Date	
Names of people conducting drill	
Site	
Address	
Pollution Incident Scenario	
SCRIM No.	

1. Select an Environmental Incident applicable to the site to test the PIRMP.
2. Conduct a desktop review using the PRIMP Test Checklist.
3. Sign off the checklist, scan and send to the HSE Superintendent
4. HSE Superintendent / Operations Manager will make amendments to the PIRMP
5. Operations Managers to hold a toolbox talk with staff on the details of the PIRMP

Are contact details current?	Yes/No
Individuals responsible for activating the plans and managing the response	
Individuals to notify & relevant authorities (Emergency Services, EPA, Public Health Unit, Safework NSW, Local Council)	
Additional Contacts relevant to the licensee’s premises, neighbours	
Environmental Hazards and Control Standards	Yes/No
Are the descriptions of environmental hazards up to date?	
Are the potential and likelihood of incidents that could occur still correct and relevant to the site operations?	
Are the pre-emptive actions for risk management of the relevant activity correct and relevant to the site?	
Is the inventory of pollutants (including quantities of pollutants onsite) correct?	
Is the listed safety equipment & PPE correct and up to date?	
Is there a map/s located onsite detailing the following; - The site & surrounding area likely to be affected in the event of an incident - The Locations of storage/ holding points of pollutants	
Are the nature and objectives of staff training set out in the plan?	
Are there details of mechanisms for providing early warnings and regular updates to the owners and occupiers?	
Is there a copy of the plan onsite and up to date?	
Evacuation Drill	Yes/No
Has there been an evacuation drill in the last 12 months?	
Date of last Evacuation Drill?	
Lessons Learnt – post incident debrief	
What worked?	
What improvements did we identify?	