2021

Pollution Incident Response Management Plan

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1. Scope and Objective

This **Pollution Incident Response Management Plan ('PIRMP')** has been developed to satisfy obligations under the ***Protection of the Environment Operations Act 1997*** **('the Act')** and associated ***Protection of the Environment Legislation*** **('POEO').**

This document applies to **Circular Plastics Australia (CPA),** and references existing emergency response plans and associated procedures. It also details additional supplementary site-specific information as required under the POEO legislation and in respect to **Environment Protection Licence ('EPL')** requirements.

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

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.

2. Referenced Documentation and Evaluation

Circular Plastics Australia operates as a Joint Venture in recycling of PET. As a part of Pact Group, Circular Plastics Australia operates within the parent company's safety and environmental framework and management system. This PIRMP is consistent with the Pact Incident reporting and investigation procedure, it supports the site-specific emergency preparedness plan, and any standard operating procedures ('SOP') mentioned. Where terms or conditions are found to be inconsistent, this PIRMP shall be viewed as subordinate to the comparison document.

Velocity HSE is used to record and monitor all environmental incidents within CPA. The software will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the HSE Manager.

The HSE Advisor is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

Specific legislative requirements for the development and implementation of this PIRMP are provided in the following table.

- Part 5.7A of the *Protection of the Environment Operations Act 1997*;
- Part 5.7A of the *Protection of the Environment Legislation Amendment Act 2011*;
- *The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*; and
- Environment Protection License 124.

Internal documentation referred to in this plan include:

- Incident reporting and investigation procedure, *PACT WHSE PRO 006-02*;
- Emergency preparedness plan (site specific);
- ASP-20220209-001 Risk assessment of environmental aspects and impacts (Velocity);
- SOP002 Stormwater management plan; and
- SOP001 Spill Response Procedure.

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 Licences (EPLs). CPA's site operates under EPL and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

The availability of this Plan will be made available by locating printed copies in the same location as the Environment Protection Licence (EPL) is located – namely in the Main Offices

3. Definitions

3.1 What is a Pollution Incident?

A Pollution incident (or event) is defined by the Act as –

- an incident, or
- a set of circumstances during, or
- a consequence of which there is or is likely to be

a leak, spill or other escape or deposit of a substance. Because of which pollution either –

- has occurred,
- is occurring, or
- is likely to occur.

Note that it does not include an incident or set of circumstances involving ONLY the emission of any noise.

3.2 Abbreviations

DG	Dangerous goods, as per the relevant Act.
EPA	Environment Protection Authority.
EPL	Environment Protection License.
PIRMP	Pollution Incident Response Management Plan.
POEO Act	*Protection of the Environment Operations Act 1997*.
POELA Act	*Protection of the Environment Legislation Amendment Act 2011*.
Run-off	The term 'run-off' in this document refers to liquids flowing from a surface positioned at a higher level to another surface positioned on a lower level.
WWTP	Waste Water Treatment Plant is used to treat any wash water from the Drum or IBC cleaning process.

4. The Plan

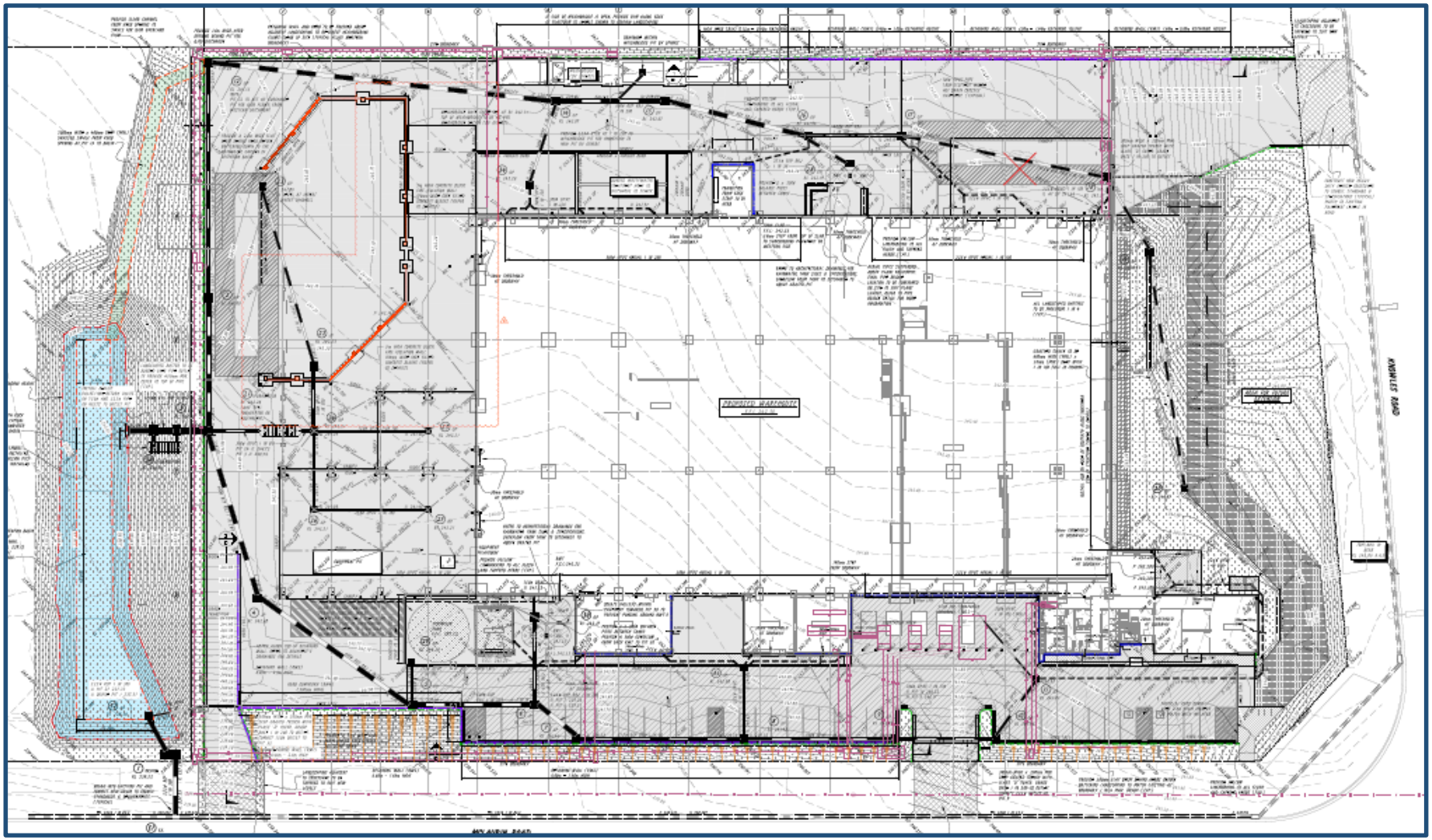
4.1 Description of Site and Facilities

The Project involves the processing of PET waste at an annual production rate of 29,000tpa to produce a high-quality raw PET material which can be used in the manufacture of new recycled PET bottles and containers. PET waste will be processed using plant and equipment designed by AMUT (Italy) and Starlinger (Austria), which are used at numerous existing facilities in Australia and around the world.

Starlinger have installed hundreds of such plant globally. The process involves loading the 1m3 bales of PET material to a feeder at the AMUT processing plant where the material will be washed, shredded, screened, and granulated into PET flakes. The washed product flakes are then fed directly to the Starlinger processing plant into a hot air dryer to remove any moisture before being heated and pelletised.

The product material is stored in bulk bags and transport of processed material from the Project site is via road transport. The process does not involve direct chemical manufacture of the PET and is predominantly driven by mechanical and heat processing steps, resulting in low emissions. Nevertheless, the plant incorporates various air emission controls on these processes, including dust cyclones and filters to remove any particulate matter generated in the process. Emissions of other air pollutants from the process are minimal as there is no chemical manufacturing or combustion of the material. Any emissions generated from the pelletisation process are captured and expelled through stacks to ensure adequate dispersion in the surrounding environment.

The Project proposes to use well-proven high-performance plant supplied by leading global manufacturers.



Stormwater collection

4.2 Description of Hazards

The site has undertaken a risk assessment of its environmental aspects and impacts and has determined the following as foreseeable pollution incidents:

- Undesirable water exiting site via stormwater drains,
- Uncontrolled air discharge to the air, and
- Uncontrolled discharge of offensive odours from site's boundary.

4.3 Risk controls

The following controls have been implemented to control the above risks:

- The site has implemented a Pollution complaints and resolution process as a requirement of its EPL and to promptly identify and control a potential pollution event. The site's pollution complaints number is listed on its website – www.circularplasticsaustralia.com and pollution complaints form is in the office and administered to by the site administration staff.

- Chemicals are handled and stored on concrete surfaces with a secondary containment system. Above ground the site contains various localised bunding or secondary containment areas where liquid can be trapped. Underground, the site contains a series of pipe work funnelling into two central pits with isolation valves in each pit. This containment system ensures that the site can contain and trap any undesirable water from leaving site.

- Spill kits are kept and made accessible near chemical handling areas and stores. They are externally maintained on a regular basis.

- Pits and tanks located across the sit.

- Waste products are legally disposed of by accredited companies.

- The site engages an accredited third party to conduct emissions testing on a regular basis in respect to its licence condition. Results are monitored closely and outliers or breaches are notified to the respective authority as required, with corrective actions to be implemented.

4.4 Inventory of Potential Pollutants

An inventory of all chemicals handled and stored onsite is maintained on a Hazardous Chemicals register.

The site conducts a review of this register as required by the Group procedure.

4.5 Notification Procedure and Contact Details

If a pollution incident occurs which causes or threatens material harm to the environment, the following parties must be notified so action can be coordinated to prevent or limit harm to the environment and human health:

- The Environmental Protection Authority on 131 555
- Center for public health, Albury on 6021 4799
- SafeWork NSW on 131 050
- ALbury City Council on 02 6023 8111 or 1300 133 391
- Fire and Rescue NSW on 000

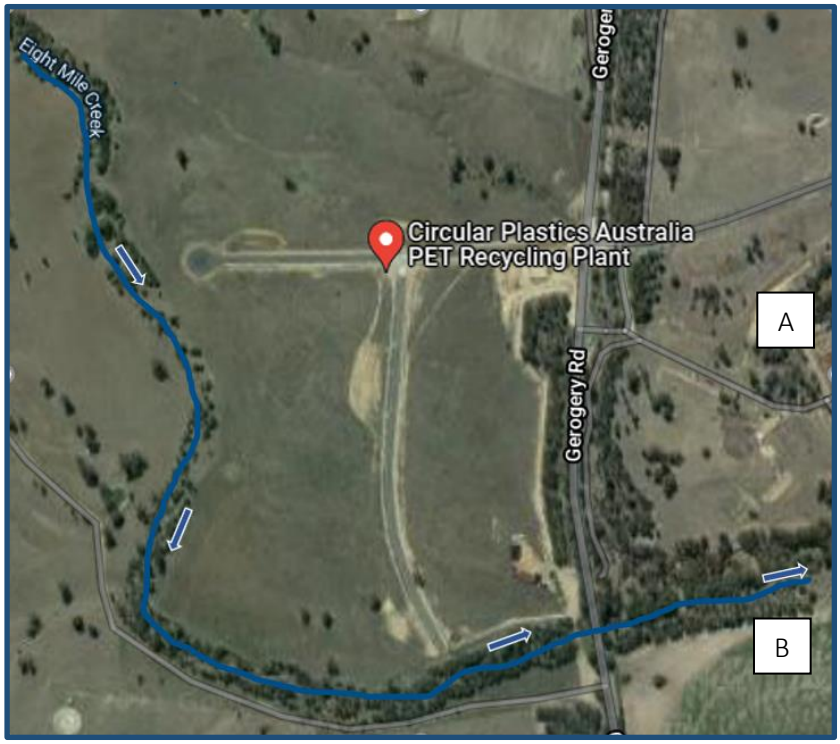
The following site Emergency Contacts must be immediately contacted in alignment with the relevant response/ notification and escalation procedure:

- Paul Miskell, Plant Manager on 0417 293 145
- Andrew Castillo, WHSE Manager on 0438 576 316
- Salio Mahoni, Production Manager on 0417 293 145

4.6 Map of location

As part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, immediate neighbouring properties will be notified, under the direction of Emergency Services with immediate response information.

The map below and the table provide information and details of the site's neighbours.



Surrounding neighbours

Nearby businesses:	Address:	Contact Number:
A. Ettamogah Rail Hub	Hub Road, Ettamogah	6025 0133
B. Cyberfit Gym Equipment	70 RW Henry Dr, Ettamogah	6025 6777

4.7 Training and Testing of the Plan

This PIRMP shall be tested:

- Routinely at least once every 12-months, or
- Within 1-month following implementation of additional controls if an incident has occurred in relation to the EPA licence.

4.8 Responding to a Pollution Incident

At all times minimising harm to persons shall be a priority. Workers are to immediately refer to and implement:

- Incident reporting and investigation procedure, *WHSE PRO 006-02* in response to an incident,
- *SOP001 Spill Response Procedure* in response to a spill event, and
- The *Emergency preparedness plan* in response to a fire or smoke event.

For all other pollution incidents, workers must immediately notify the manager and take action to contain the risk and minimise any harm it could cause to the environment and to people.

4.9 Identification of level of Harm

The following levels of pollution incidents are used at CPA:

1. Trivial → Can be cleaned up by person who made the spill without any further harm to the environment or to persons.
   Instruction: If it is safe to do so take steps to manage the safety of others within 3 m or more of the incident.

   - A spill of hazardous liquids < 2 litres or < 2kg of hazardous chemicals where the person can safely clean it up or
   - A spill of < 10 litres or kg of non-hazardous chemicals liquids
   - The spilt material did not spread more than $2m^2$ and did not go down any drain

2. Notifiable internal incident → Where a person requires help from other staff to clean up the spill
   Instruction:

   Notifications:

   - Report the incident to your Supervisor and if necessary the Shift Manager
   - If it is safe to do so take steps to manage the safety of others within 3 m or more of the incident.
   - If there is any doubt as to the scale or action trigger a Level 3+ incident

   Incident Response:

   - The Incident Controller to manage the spill/incident → Stop, contain and clean up
   - Contain the spill or incident while applying appropriate safety measures
   - Generally, the most senior person at the scene to take control as the Incident Controller (supervisor, or site manager)
   - This may occur a few times depending on who is at the scene and takes control

   Post Emergency:

- Clean up and disposal organised if required
- Enter incident into Velocity

Examples:

- A spill of > 10 but < 20 litres of non-hazardous liquid
- A spill of > 5 litres or kg of a Hazardous Chemical
- The spilt material spread > 2m^2 but did not enter a stormwater or sewer drainage system and was easily contained.
- All spilt material remains within the area and does not enter into a stormwater drain or exits the site

3. Possible licence report → Sub-material harm, but may wish to report it to EPA only as a licence condition
Instruction:

Alarm raising and Notifications:

- Report the incident to your Supervisor and if necessary the Shift Manager
- The WHSE or other appropriate Manager to inspect the incident and if necessary escalate the incident accordingly
- If a complaint is received it is recorded and appropriate action is undertaken

Incident Response:

- If it is safe to do so take steps to manage the safety of others within 3 m or more of the incident.
- Generally, the most senior person at the scene to take control as the Incident Controller (production manager or operations manager).
- Contain the spill or incident while applying appropriate safety measures
- Folow the SOP001 Spill Response Procedure.
- The Incident Controller to manage the spill/incident → Stop, contain and clean up

Post Emergency:

- Clean up and disposal organised
- Notify the EPA inspector that a minor licence breach has occurred and that it is not considered material harm at this stage.
- Enter incident into Velocity

Examples:

- A spill of > 1 litres of non-hazardous liquid, which has entered the stormwater system
- A spill of > 200 ml of a Hazardous Chemical which has entered the stormwater system
- A spill of > 2 kg of solid non-hazardous material, which has entered the stormwater system or gone off site
- Complaints from < two neighbours of odour or dust are received, or

4. Material Harm low level → Reportable as material harm, but does not require a fire unit on site (ring 1300 729 579 not 000). The incident can be adequately managed internally.

Instruction:

Alarm raising and Notifications:

- Report the incident to your Supervisor and if necessary the Shift Manager
- If a fire, explosion or there are injuries from a chemical spill contact a senior manager immediately
- Supervisor and Shift Manager to report to management
- The WHSE or other appropriate Manager to inspect the incident and if necessary escalate the incident to the Site Manager accordingly
- WHSE manager to upon being aware of the scale of the incident immediately organise for the 5 Government Agencies to be notified
- If a complaint is received it is recorded and appropriate action is undertaken

Incident Response:

- Generally, the most senior person at the scene to take control as the Incident Controller or delegate (Site Manager)
- The Incident Controller to assess the scale of the incident and consider evacuation, first aid etc. and notify Security if necessary for general alarm
- The Incident Management Team to become involved
- Contain the spill or incident while applying appropriate safety measures
- The Incident Controller to manage the spill/incident → Stop, contain and clean up

Post Emergency:

- Clean up and organise the disposal
- Report, Review & Improvement Planning – Incident Management Team
- Revise, Plan and Record Changes – WHSE Manager
- Replace used equipment
- Re-test PIRMP within 30 days, update PIRMP

Examples:

- Any spill or escape of a solid liquid or gas which is likely to cost more than $10,000 to rectify
- Legitimate complaints from > 2 neighbours of odour or dust are received but have also one complaint or more where reported health issues such vomiting resulted or need to visit a doctor or hospital was necessary
- A spill that has entered into the stormwater system but is unable to be stopped from leaving the site or
- Any media coverage or likely media coverage of the incident
- EPA indicates it is a Material Harm event shortly after its occurrence

5. Material Harm High Level → Reportable as material harm requires fire unit, 000 as the incident cannot be adequately managed internally.

Instruction:

Alarm raising and Notifications

- Report the incident to your Supervisor and if necessary the Shift Manager

- If a fire, explosion or there are injuries from a chemical spill contact a senior manager immediately
- Supervisor and Shift Manager to report to the site manager, the WHSE manager
- The WHSE or other appropriate Manager to inspect the incident and if necessary escalate the incident to the General Manager and the WHSE General Manager.
- The Incident Controller to assess the scale of the incident and consider evacuation, first aid etc and notify Security if necessary for general alarm
- Site Manager to upon being aware of the scale of the incident immediately organise for the 5 Government Agencies to be notified
- Site Manager to organise for other managers be notified
- If neighbours are affected invoke Communicating with neighbours and the local community

Incident Response - Unless a full Evacuation has been called continue with the following actions:

- Generally the most senior person at the scene to take control as the Incident Controller or delegate
- The Incident Management Team to become involved
- Contain the spill or incident while applying appropriate safety measures
- The Incident Controller to manage the spill/incident → Stop, contain and clean up
- Incident Controller to liaise with Emergency Services when on site and follow their instructions

Post Emergency:

- Wait for Emergency Services to declare the emergency over
- Clean up and organise disposal with Sanitation and the GMP team
- Report, Review & Improvement Planning – Incident Management Team (IMT) & WHSE
- Revise, Plan and Record Changes – WHSE
- Replace used equipment

Examples:

- A site evacuation is required for a pollution incident
- The incident large and requires external Emergency Services (i.e. a fire unit) to be on site to assist
- Neighbours are affected or likely to be affected, beyond interference with general wellbeing or their repose, or
- Any spill or escape of a solid liquid or gas which is likely to cost more than $10,000 to rectify and external assistance is required to limit further environmental harm.

5. Revision history

PIRMP
Created by Andrew Castillo, WHSE Manager. Reviewed by: Paul Miskell, Plant Manager and Andrew Castillo, WHSE Manager. Approved by: Paul Miskell, Plant Manager and Andrew Castillo, WHSE Manager. Version Number: 1.0 Prepared on: 02/11/2021 Revised on: 02/11/2021

6. Endorsement

This PIRMP has been endorsed by CPA'a Plant Manager and the WHSE Manager

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APPENDIX 1 – REGULATORY REQUIREMENTS

PIRMP Legislation

POEO Act Part 5.7

Duty of licence holder to prepare pollution incident response management plan

153A 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.

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

153C (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.

Keeping of plan

153D 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.

Testing of plan

153E 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.

Implementation of plan

153F 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

Hazards:

98C(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates

Likelihood:

98C(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,

Pre-Emptive Action:

98C(c) 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,

Pollutant Inventory Types:

98C(d) 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,

Authority Contact:

98C(h) 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,

98C(k) Maps:

	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,
98C(n)	Timing of Testing: 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).
	Privacy Protection:
98D(4)	(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).
98E(1)	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.

Minimum Testing:

2) Any such test is to be carried out:

98E(2) (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