



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

TRACO Pty Ltd.

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1 INTRODUCTION

The *Protection of the Environment Operations Act 1997* (POEO Act) specifies within Section 147 that there is a duty to report a pollution incident if there is a threat or material harm to the environment. A pollution incident is defined 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.”

2 SCOPE AND OBJECTIVE

This pollution incident response management plan (PIRMP) for the TRACO Pty Ltd Tyre recycling facility is a document set out to fulfil the requirements of Part 5.7A of the POEO Act and contains the details required for pollution incident response management plans as set out within Part 3A of the *Protection of the Environment Operations (General) Regulation 2009*. The content of this plan includes:

- The procedures to be followed by the licence holder in notifying a pollution incident;
- A detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and
- 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 the persons through whom all communications are to be made.

3 ABOUT SITE

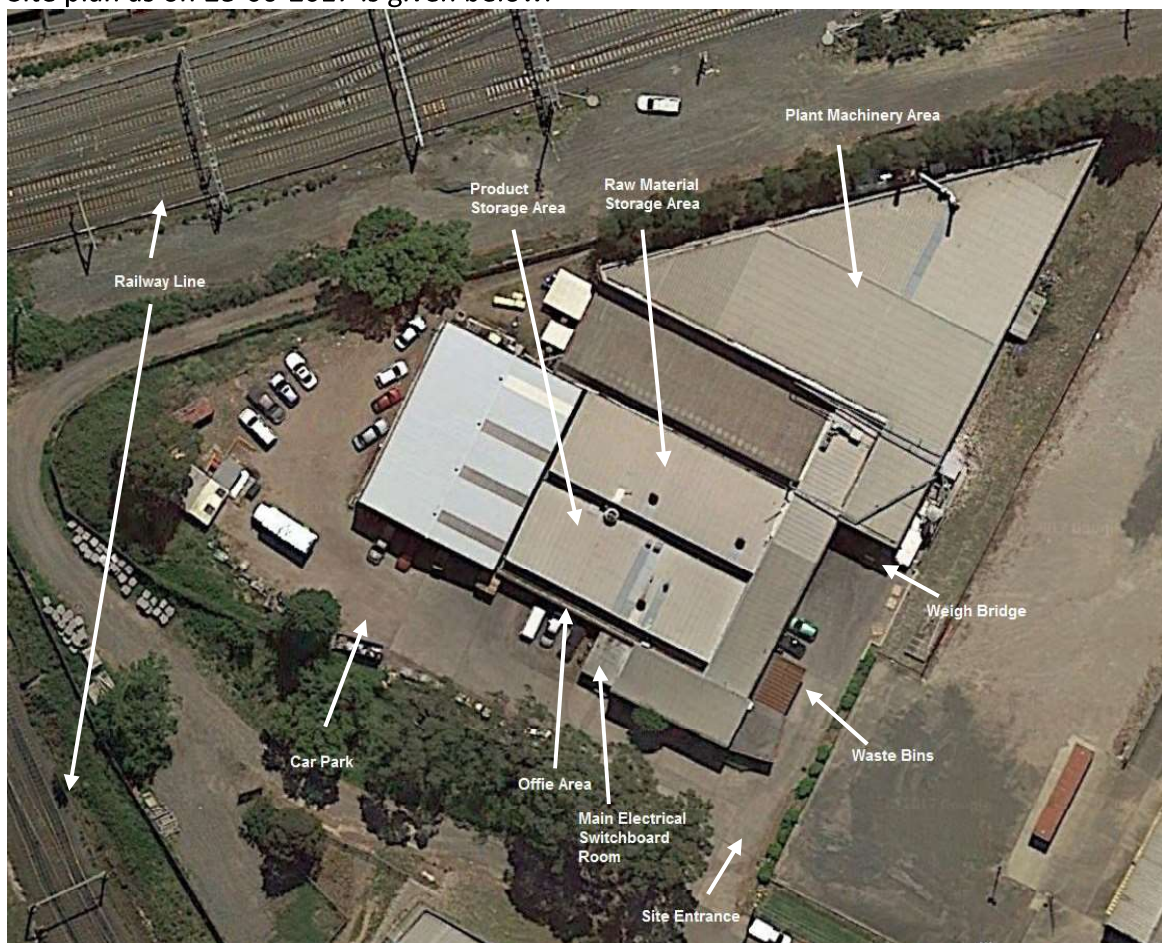
Address	<ul style="list-style-type: none"> • 191 Arthur Street, Homebush West, NSW 2140
Site Area	<ul style="list-style-type: none"> • Lot and Building area: • Area of Lot A = 4,046m² • Area of Lot B = 2,023m² • Building floor area on Lot A = 1,831m² • Building floor area on Lot B = 1,204m² • Total building floor area = 3,035m² • Gross floor area = 3,035m² • %GFA = 3035/6069 = 50%
LGA	<ul style="list-style-type: none"> • Municipality of Strathfield
Zoning	<ul style="list-style-type: none"> • IN1 General Industrial
Regulatory Controls	<ul style="list-style-type: none"> • The site will operate under development application file # DA 2017/036 • An Environmental Protection Licence is required for this facility under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>.
Waste tyre accepted	<ul style="list-style-type: none"> • Used truck tyres
Operating Hours	<ul style="list-style-type: none"> • 7am to 11pm Monday to Saturday

3.1 Site Location

The site is located Homebush West, 16 km west of Sydney CBD. It is located 344m away from the sensitive Medium Density Residential zone R3 (Lidcombe township).



Site plan as on 28-06-2017 is given below.



3.2 Surrounding Premises

The site is in a IN1 General industrial area, and is surrounded by rail track, industrial and commercial premises on all sides. The block on the east of the site is being used as an insulation manufacturing facility named Fletcher Insulation Pty Ltd. Lettuce Deliver Organics Pty. Ltd. operates from the site on the South of Traco Pty Ltd.

The land use surrounding the site is summarised below.

North of Site:

- Flemington train depot.

South of site:

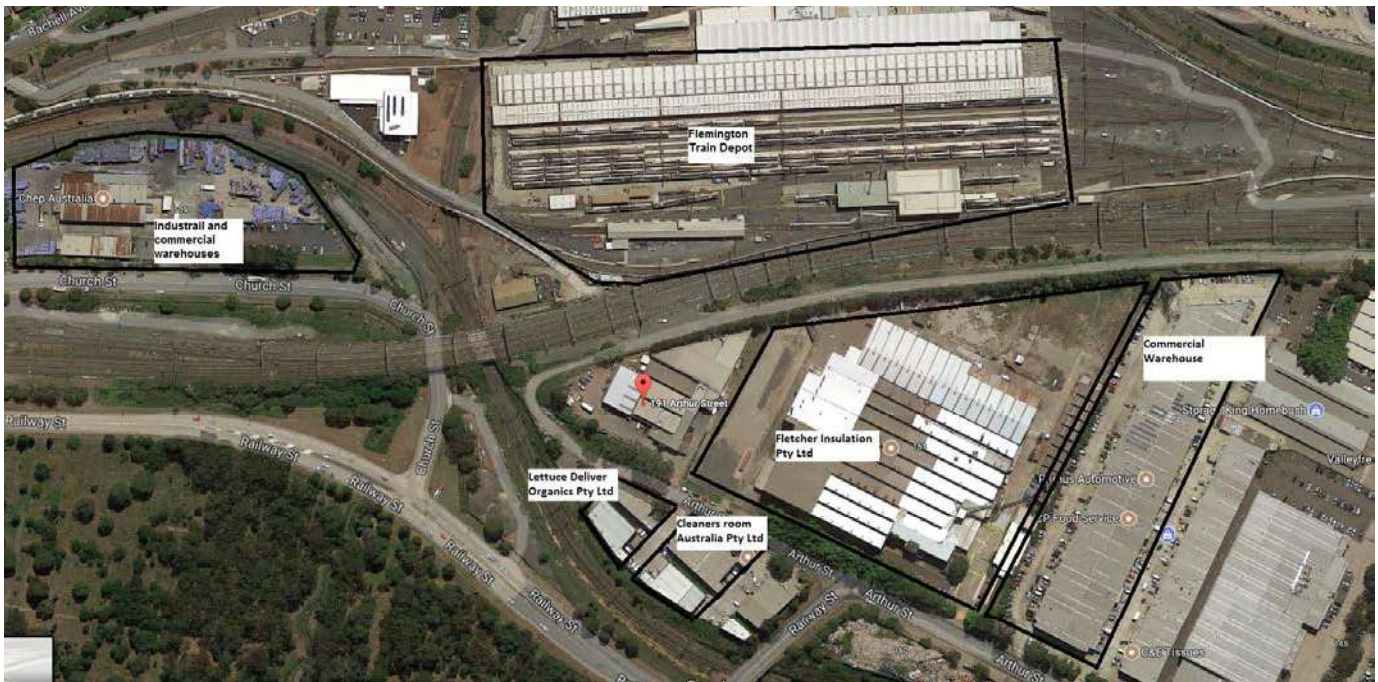
- Lettuce Deliver Organics Pty Ltd, Cleaners room Australia Pty Ltd, Rookwood Cemetery

East of site:

- Fletcher Insulation Pty Ltd, Commercial buildings

West of site:

- Commercial, industrial warehouses, NSW rail track



3.3 Overview of receiving and processing of used tyres



4 DESCRIPTION AND LIKELIHOOD OF HAZARDS

4.1 Description of the licensed activity and hazards to human health and environment

This Pollution Incident Response Management Plan (PIRMP) addresses EPL File No. EF17/268339. Scheduled activities include:

- Used tyres collection;
- Recycling process;
- Finished product storage
- Waste management

From these scheduled activities, the hazards to human health and the environment have been identified. These include:

- Air Pollution/Odour
- Noise
- Chemical Spill
- Storm water contamination
- Fire
- Vehicle collision
- Litter

Based on these activities, the severity of any pollution incident should be ranked based on the extent to which a pollution hazard poses to humans and the environment (Table 2).

TABLE 2 RANKING OF POLLUTION INCIDENT

Description of pollution event	Severity score
Pollution could affect only those in the immediate vicinity	1
Pollution could affect others within the site	2
Pollution could affect surrounding neighbours	3

Table 3 identifies a list of foreseeable hazards that could occur on this site because of regular operating procedures. A risk management table is used to score the risk associated with any hazard.

TABLE 3 HAZARD IDENTIFICATION

Type of Pollution	Hazard	Likelihood of Hazard occurring	Consequence	Risk Score
Air Pollution/Odour	Dust	Possible	Insignificant	4
Noise	Hearing problems	Possible	Minor	3
Chemical Spill	Fuel / oil	Unlikely	Minor	4

Strom water contamination	Carbonised water	Unlikely	Moderate	3
Fire	Heat, smoke and depletion of oxygen	Rare	Major	2
Vehicle collision	Damage to man / material	Possible	Moderate	2
Litter	Health problems	Possible	Minor	3

TABLE 4 RISK MATRIX

Likelihood	Consequence				
	Catastrophic Death Permanent disabling injury or extensive permanent environmental damage	Major Extensive permanent injury or extensive temporary or minor permanent environmental damage	Moderate Significant non-permanent injury. Overnight hospitalisation. Temporary environmental damage consultants required for assessment and clean-up	Minor Medical help needed. Treatment by medical professional. Environmental clean-up done in house	Insignificant Dealt with in house
Almost certain to occur in most circumstances	1	1	1	2	2
Likely to occur frequently	1	1	2	2	3
Possible and likely to occur at some time	1	1	2	3	4
Unlikely to occur but could happen	1	2	3	4	5
May occur but only in rare and exceptional circumstances	2	2	3	5	6

Note: Risk scores are developed prior to any control measures in place.

5 PRE-EMPTIVE ACTIONS TO BE TAKEN

Identified hazards and their mitigation actions are as under:

Air pollution / Odour	<ul style="list-style-type: none">•Dust collection units are installed at all potential points of recycling line.•Machinery area has ventilation windows at the top
Noise	<ul style="list-style-type: none">•Machines are covered for reduction of noise•Suitable PPEs (ear muffs) to be used by all staff working in machinery area
Chemical spill	<ul style="list-style-type: none">•MSDS placed at designated storage location of LPG gas bottles and domestic cleaning products.•Spill kits available at site.
Stormwater contamination	<ul style="list-style-type: none">•Bunding of 150mm made around whole site•Stormwater isolation valve placed at all discharge points
Fire	<ul style="list-style-type: none">•Fire alarm system with smoke detectors, back to base alarm and manual call points available•Fire extinguisher, fire hose, hydrant system is available at different locations of machinery area, office and storage area.
Vehicle collision	<ul style="list-style-type: none">•Vehicle movement is controlled by road marking, sign posting and security staff•Speed limit for all vehicles in plant is 5km/hour
Litter	<ul style="list-style-type: none">•Separate bins are available for garbage and steel scrap.•Small bins are placed in office areas.•Toilet and washing facilities available for staff and visitors

6 INVENTORY OF POLLUTANTS

The main potential pollutants associated with this site are generated as a result of current activities. These include:

- Dust from processing operations and vehicle movements.
- Domestic quantities of cleaning products;
- Grease for lubricating machinery;

Item Name	Quantity	Storage Area
LPG gas bottles	<500 kg	store room
Floor cleaners (disinfectant)	<20L	store room
Toilet cleaner	<20L	store room
Other cleaners (glass, table etc.)	<20L	store room
Grease	<10kg	store room

Note: No polluted air is released in atmosphere. Process dust is collated in bags and disposed by EPA certified contractor.

For all chemicals stored on site, a material safety data sheet is stored in the site office and can be accessed by all staff.

7 SAFETY AND CLEAN-UP EQUIPMENT

Spill kits	1 in Machinery area, 1 in store
Material Safety Data Sheets	Storage Shed
First Aid Kit	In office
Fire extinguishers	2 in office 5 in product storage 3 in tyre storage 1 in kitchen 9 in machinery area
Fire hoses	2 in product storage yard 1 office area 1 machinery area
Fire Hydrant	1 at the main entrance of factory
Personal Protective Equipment	Worn by staff, spares in store
Traffic bollards and traffic cones	Loading bay / Open area

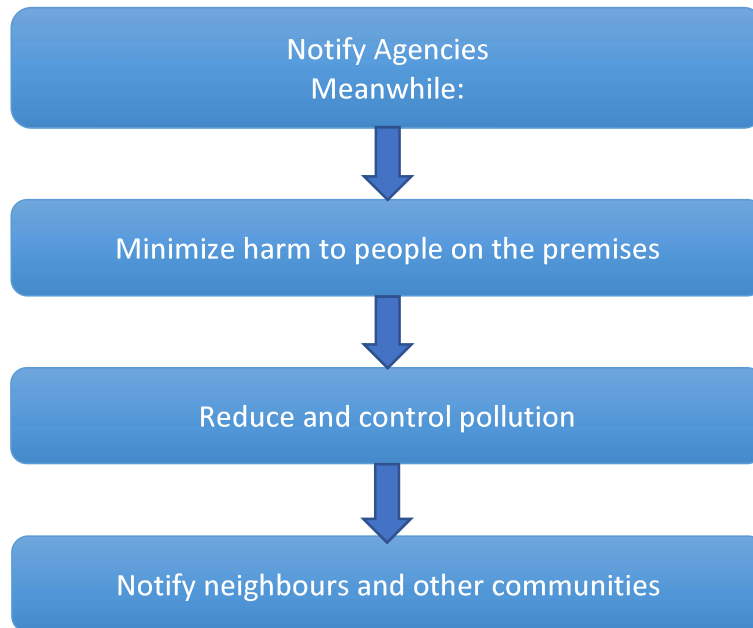
8 CONTACT DETAILS & RESPONSIBLE PERSON

The person responsible for implementing this plan is Qasim Ali Munir, Senior Project Administrator, Traco Pty Ltd.

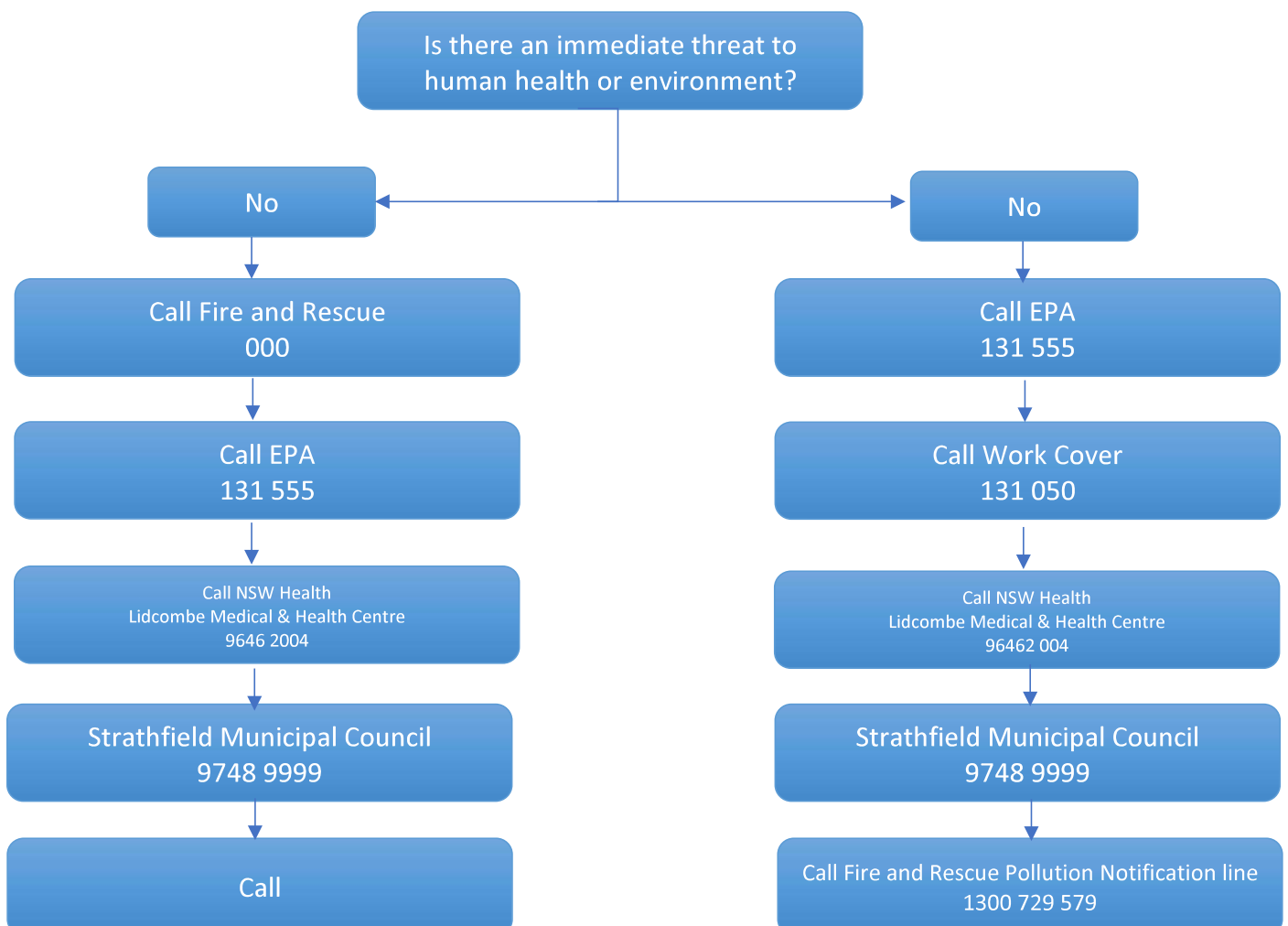
In the case of a pollution incident, the following people should be notified immediately:

Primary Site Contact	Qasim Ali Munir Senior Project Administrator 0403 390 071
Secondary Site Contact	Zaheer Beber Alvi Chairman Traco Pty Ltd 0418 260 833

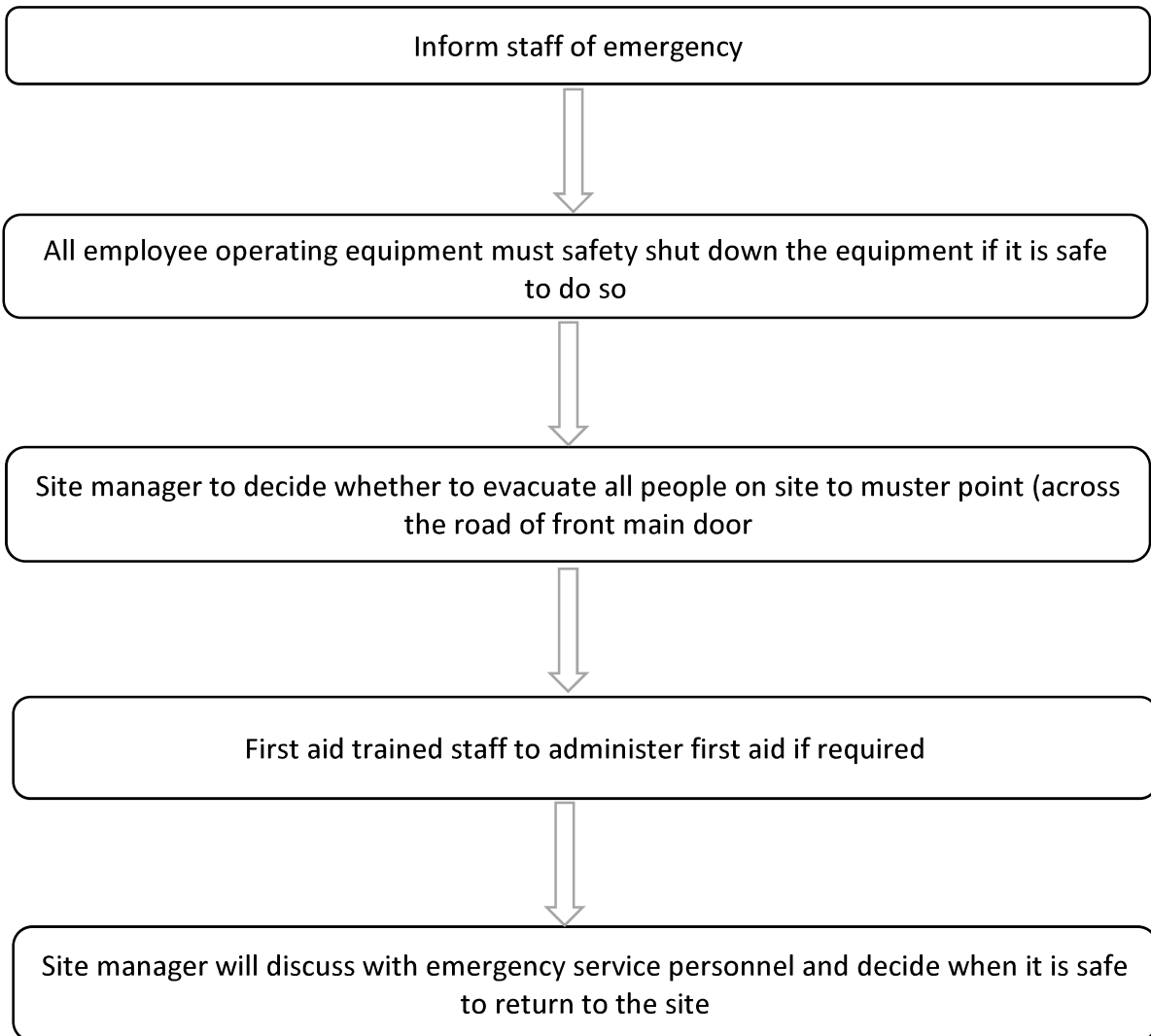
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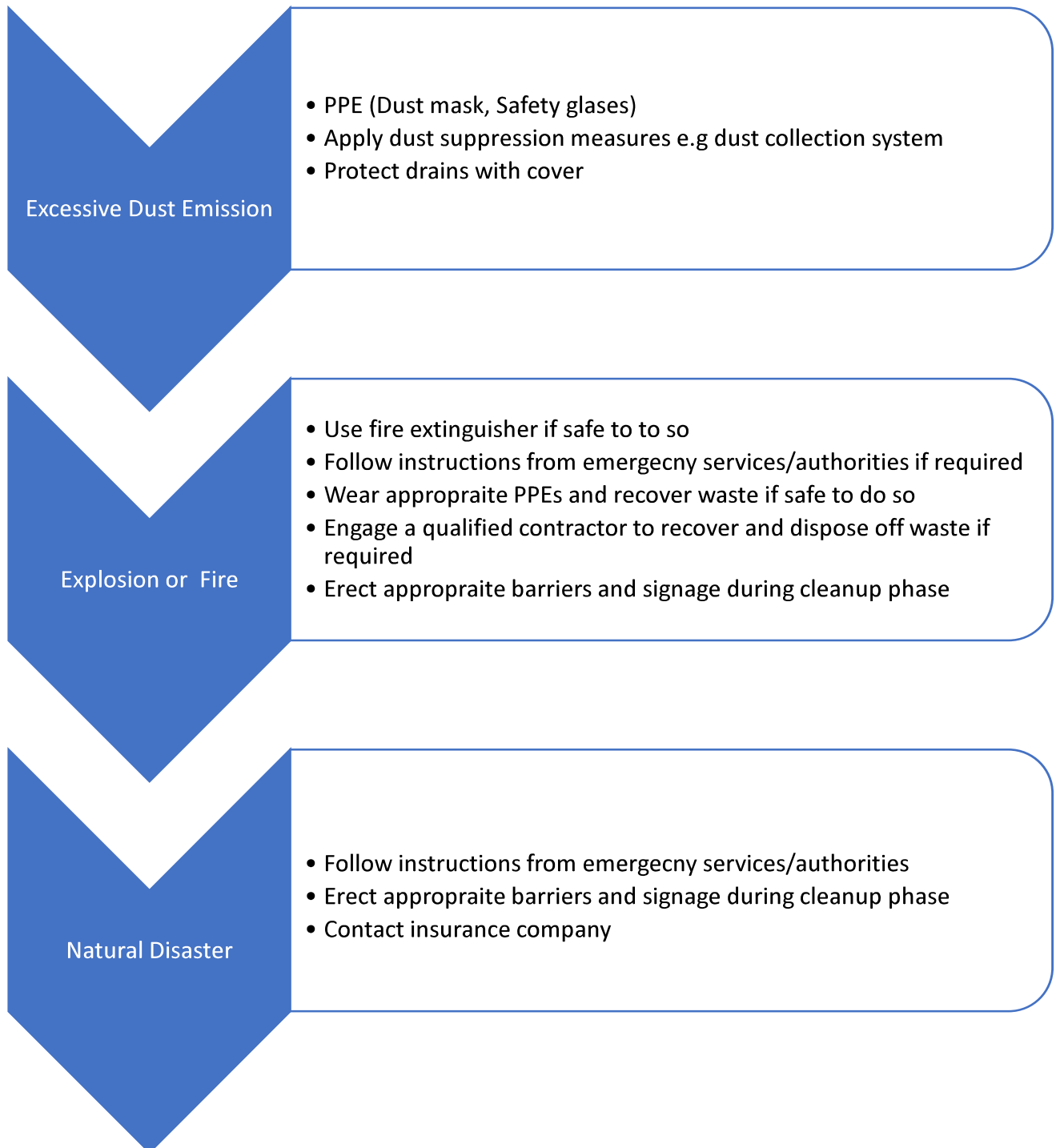
9.1 Notify Agencies



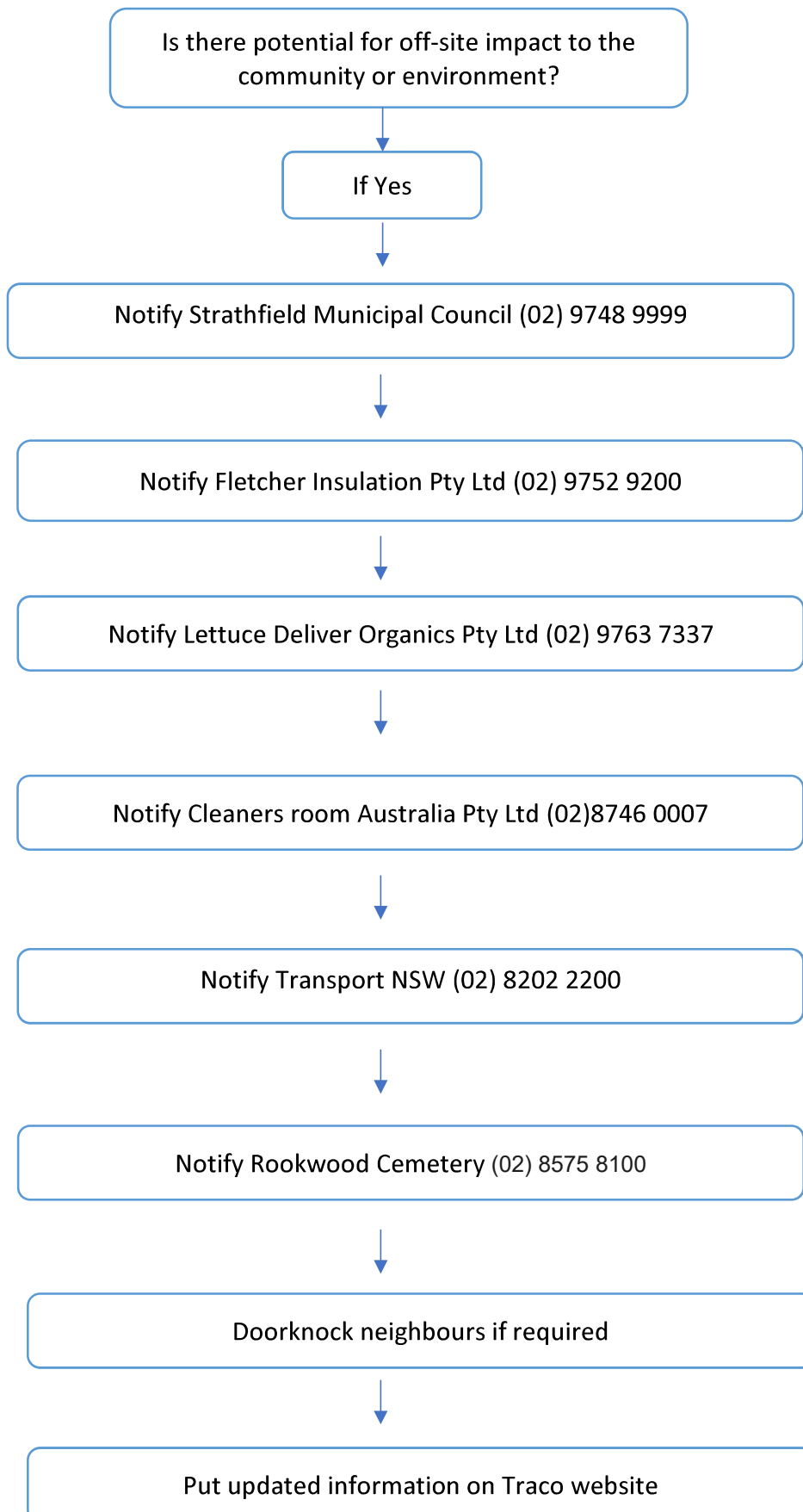
9.2 Minimize harm to the people on the premises



9.3 Reduce and control pollution



9.4 Communicate neighbours and community



10 STAFF TRAINING AND TESTING THIS PLAN

10.1 Staff Training

- New employees will be made aware of the requirement of the plan as part of their induction process
- All employees will be trained in the use of spill kits and fire extinguishers.
- All employees are required to complete refresher training on a regular basis.
- In addition to the above induction and training, details of this plan will be provided to key contacts on site and off site on request.

10.2 Testing this Plan

- This plan will be reviewed once a year to ensure that the information contained within the plan is accurate and current. If necessary, the plan will be updated as a new version.
- Evacuation drills will be carried out at least once a year.
- Improvements identified in the review and drills will implemented.
- Records will be kept of the reviews and drills, their outcomes and any improvements identified and implemented.

10.3 Evacuation Map and Muster Point

