

## **Pollution Incident Response Management Plan**

D&N Rubber Refinery Pty Ltd – Tyre Recycling Facility  
66 Victoria Street, Smithfield

22 June 2018

## **D&N RUBBER REFINERY**



## EXECUTIVE SUMMARY

This Pollution Incident Response Management Plan (PIRMP) has been developed for the Proposed D&N Rubber Refinery Tyre Recycling Facility located at 66 Victoria St, Smithfield.

This document has been set out to fulfil the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* 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.

It is important to note that this PIRMP is a working document. If operating conditions or waste processing practices on the site change, the PIRMP needs to be updated to reflect the changes in practices. D&N Rubber Refinery Pty Ltd are committed to working with the NSW Environment Protection Authority (EPA), and appropriate changes to the conditions of the Environment Protection Licence will be made before any site changes are implemented.

Below is a summary of the immediate steps to be taken in the event of a pollution incident (Table 1.1).

**Table 1.1. Summary of Pollution Incident Response.**

In the event of a pollution incident		Responsibility and Action Required	Section of Report
<b>Step 1</b>	Contact Operations Manager		Section 7
<b>Step 2</b>	Is there an immediate threat to human health and the environment?	Call Emergency Services (000) or 112 for mobile phones	Section 8.1
<b>Step 3</b>	Does the site need to be evacuated?	Initiate evacuation procedure Safely follow pollution incident procedures	Section <b>Error! Reference source not found.</b>
<b>Step 4</b>	Inform other relevant authorities of the incident	Follow the pollution incident plan contacting the relevant authorities	Section 8.1
Additional staff responsibilities			
<b>Step 5</b>	Onsite Staff	Operations Manager	Director
	Assist with Clean Up	Coordinate onsite plan	Call relevant regulatory authorities as specified in Section 8.1
	Follow instructions of Operations Manager	Barricade off area and notify staff onsite	Engage appropriate consultants
		Complete incident reporting form	Submit incident report form to EPA
			Review this plan within 30 days of report

It is recommended that all sections of this document are read, and the appropriate training undertaken, prior to responding to an incident.

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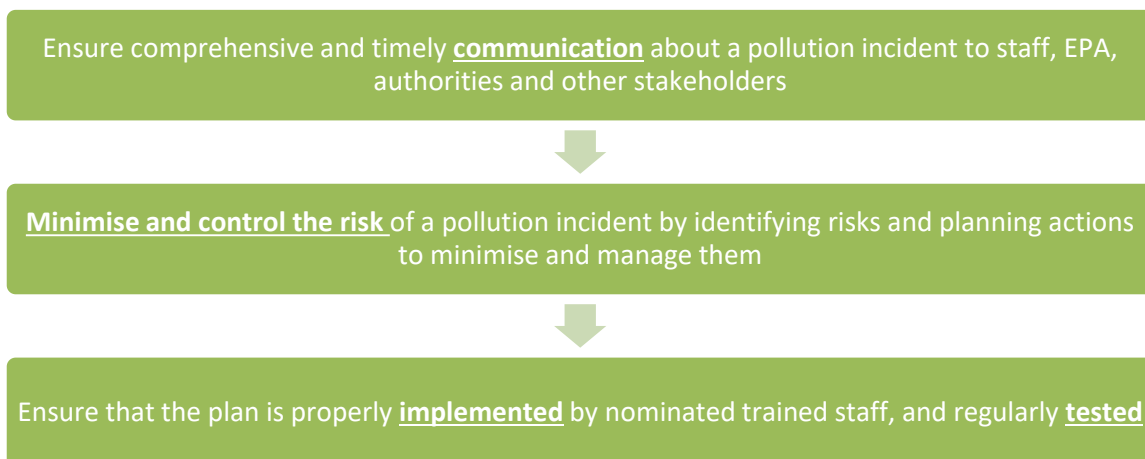
## 1. Purpose of This Plan

Under the *Protection of the Environment Operations Act 1997*, holders of an Environment Protection Licence (EPL) must prepare and implement a Pollution Incident Response Management Plan.

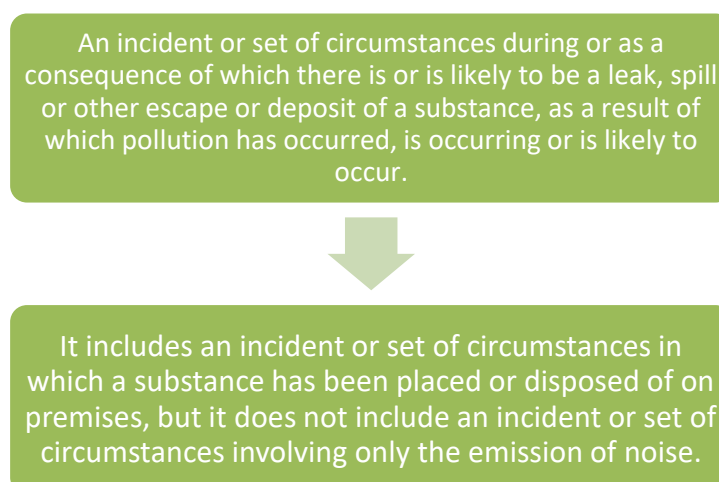
The Protection of the Environment Operations Act 1997 (POEO Act) specifies within Section 147 that there is a duty to report a pollution incident if there is a threat or material harm to the environment. A pollution incident is defined as:

*“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.”*

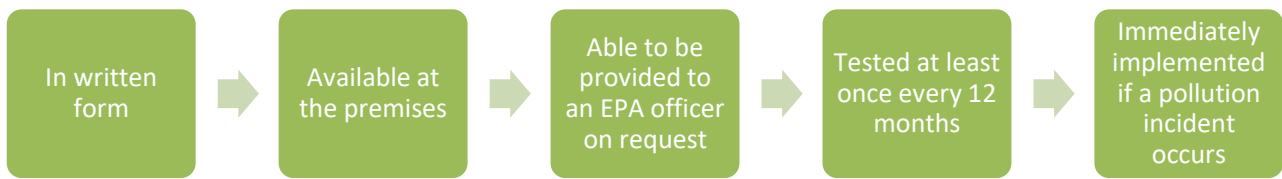
The objectives of the PIRMP are to:



A “pollution incident” is defined as:



The PIRMP must be:



## 2. About the Site

Address	<ul style="list-style-type: none"><li>• 66 Victoria Street, Smithfield, NSW</li></ul>
Lot number	<ul style="list-style-type: none"><li>• Lot 11, DP 239868</li></ul>
Site size	<ul style="list-style-type: none"><li>• Approximately 1,980m<sup>2</sup> lot size in total, approximately 1,632m<sup>2</sup> of building floor area</li></ul>
LGA	<ul style="list-style-type: none"><li>• Fairfield City Council</li></ul>
Zoning	<ul style="list-style-type: none"><li>• IN1 - General Industrial</li></ul>
Regulatory Controls	<ul style="list-style-type: none"><li>• The tyre recycling facility has been granted development consent by Fairfield City Council, under development application number 527.1/2017</li><li>• As the facility processes more than 5,000 tonnes of tyres per annum, and greater than 5 tonnes of tyres or 500 tyres are stored at any one time, an Environment Protection Licence is required under the <i>Protection of the Environment Operations Act 1997</i>. No works or activities are to be undertaken at the site prior to an Environment Protection Licence being approved for the Facility.</li></ul>
Waste types accepted	<ul style="list-style-type: none"><li>• Up to 8,000 tonnes per annum of passenger vehicle and truck tyres will be sourced and processed at the facility.</li></ul>

## 2.1 Location and Site Description

The subject site is located at 66 Victoria Street, Smithfield, in the Fairfield Municipal Council local government area. The site is also identified at Lot 11 DP 239868. The lot size is approximately 1,980m<sup>2</sup>, including approximately 1,632m<sup>2</sup> of building floor area. The site is zoned IN1 General Industrial as shown in Figure 2.2.

The site has sufficient turning area for all rigid vehicles to enter and leave in the forward direction. The site is located facing Victoria Street, a collector road with a speed limit of 60km/hr, with two traffic lanes and kerbside parking on either side of the carriageway.

The site has a total of five existing car parking spaces within the front setback area. The approved development includes an additional three car parking spaces, increasing parking to a total of eight car parking spaces.

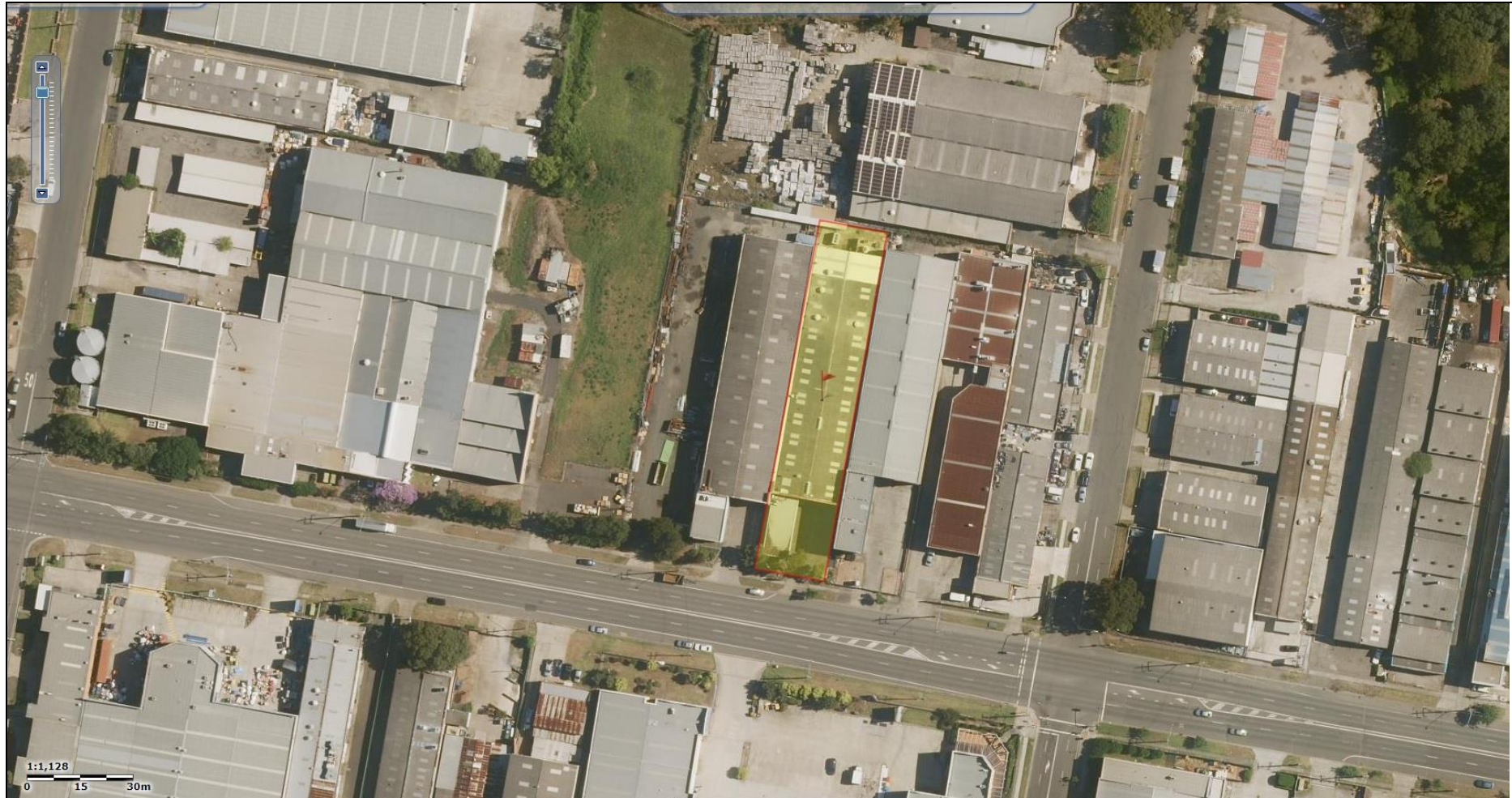
Such access and parking will comply with *Fairfield City Wide Development Control Plan 2013* Section 9.2 - Car Parking, Vehicle and Access Management and AS 2890 – Parking Facilities.

The subject site is zoned IN1 General Industrial pursuant to Fairfield Local Environmental Plan 2013 as shown in Figure 2.2. The proposed development meets the definition of a “Resource recovery facility” and therefore the development is consistent with Section 120 of the *State Environmental Planning Policy (Infrastructure) 2007*, being development, which is permissible subject to development consent from council.

Figure 2.7 provides an overview of the waste receipt and processing.

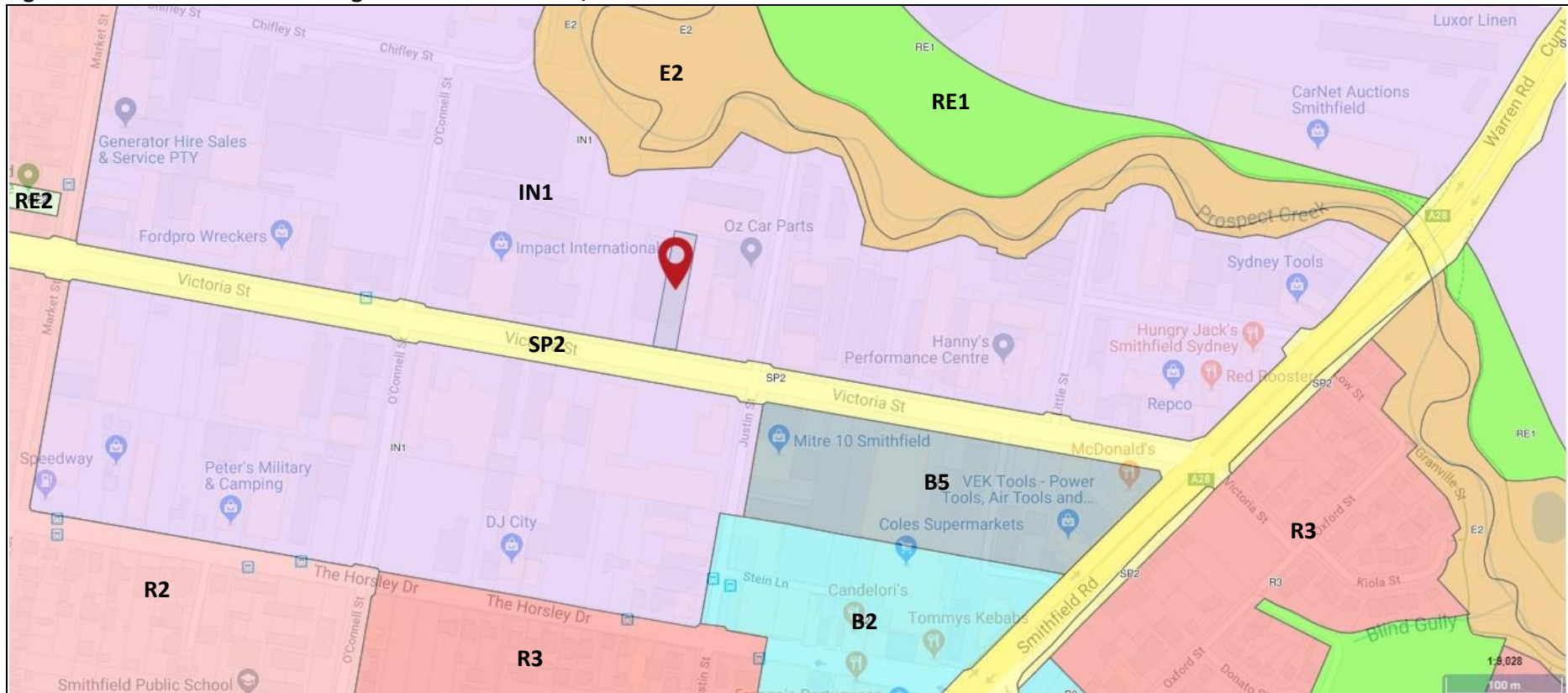


Figure 2.1. Aerial view showing Lot 11 DP 239868 (site outlined in red).



Date	Revision	Drawn By	Site description	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>		Client	D&N Rubber Refinery Pty Ltd
05/06/18	Revision A	M. McGee	66 Victoria Street, Smithfield			Project	D&N Rubber Refinery Tyre Recycling Facility
						Title	Aerial view Lot 11 DP 239868
						Scale	As Shown
						Source	NSW Department of Planning and Environment

Figure 2.2. Site location and zoning for 66 Victoria Street, Smithfield.




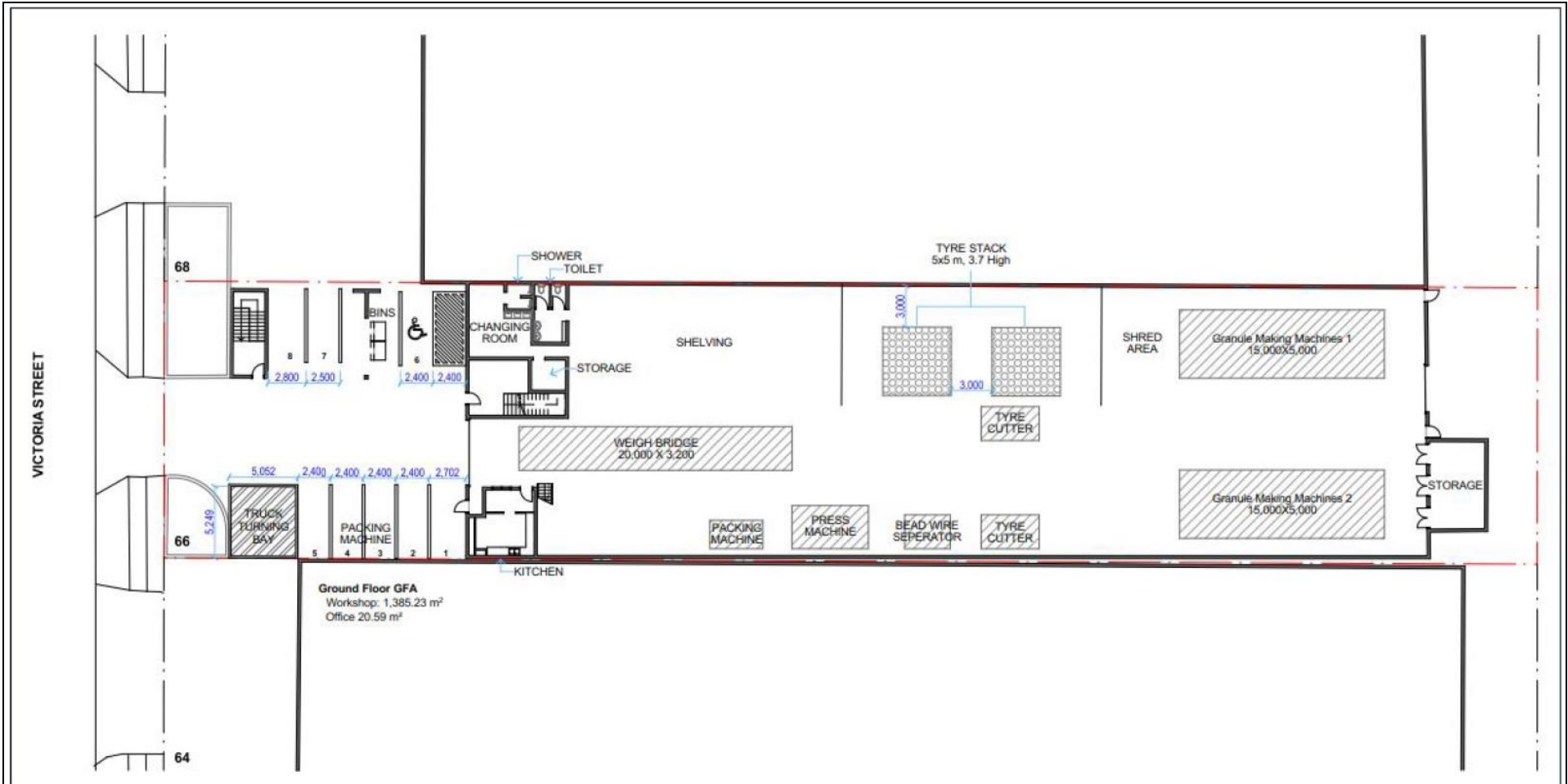

<b>Date</b>	<b>Revision</b>	<b>Drawn By</b>	<b>Site description</b>	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>	 <b>JACKSON ENVIRONMENT AND PLANNING</b> STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT	<b>Client</b>	D&N Rubber Refinery Pty Ltd
05/06/18	Revision A	M. McGee	66 Victoria Street, Smithfield			<b>Project</b>	D&N Rubber Refinery Tyre Recycling Facility
						<b>Title</b>	Zoning for Lot 11 DP 239868
						<b>Scale</b>	Not to Scale
						<b>Source</b>	NSW Department of Planning and Environment



Figure 2.3. Schematic of Plant and Storage Layout.



<b>Date</b>	<b>Revision</b>	<b>Drawn By</b>	<b>Site description</b>	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>	 <b>JACKSON</b> <b>ENVIRONMENT AND PLANNING</b> STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT	<b>Client</b>	D&N Rubber Refinery Pty Ltd
05/06/18	Revision A	M.McGee	66 Victoria Street, Smithfield			<b>Project</b>	D&N Rubber Refinery Tyre Recycling Facility
						<b>Title</b>	Schematic of Plant and Storage Layout
						<b>Scale</b>	Not to Scale
						<b>Source</b>	Planzone Pty Ltd

## 2.2 Surrounding Premises

The site is located in an industrial zoned area (Figure 2.2), with similar use premises in the nearby area. Under the *Fairfield Local Environmental Plan 2013*, a wide range of land uses are permitted in this area, with consent. The activities of the adjoining businesses are summarised in Table 2.1.

**Table 2.1. Adjoining and nearby business details.**

Neighbour	Owner	Description of Business
78 Victoria St	Impact International	Automotive
73 Victoria St	Eclipse Environmental	Automotive
68 Victoria St	Wexford Welding	Metal Structural Works
64 Victoria St	Tools Warehouse	Hardware
60 Victoria St	Global Signs	Signage
49-63 Victoria St	United Electrical Supplies	Electrical Wholesale
49-63 Victoria St	Proma Air Conditioners	Air Conditioner Supplier
46 Victoria St	National Trailers and Campers	Automotive
39 Justin St	Hi-Class Mechanical Repairs	Automotive
41 Justin St	Dalmar Body Repairs	Automotive
42 Justin St	Save Body Repairs	Automotive
43 Justin St	ATRA Mechanical Repairs	Automotive
44-46 Justin St	Oz Car Parts	Automotive
45 Justin St	HEQS Group	Appliance Importer
48 Justin St	Bestwood	Commercial Interiors
52 Justin St	Cowdroy	Door Supplier

### Nearest Sensitive Receptors

#### 2.2.1 Residential

The site is located in an industrial zoned area (Figure 2.2), with the nearest residential areas being located on The Horsley Drive to the south, on Market Street to the west, and on Smithfield Road / Warren Road to the east. The closest residences are along The Horsley Drive approximately 250m to the South East of the site.

#### 2.2.2 Waterway

The nearest waterway is Prospect Creek, located approximately 80m to the north of the subject site. The creek is typical of an urban waterway and is threatened by a range of activities and associated infrastructure. The dominant land use within the creeks catchment is a mix of light industrial and residential.

Full concrete bunding to 150mm is provided on the site. Should any chemical spill occur outdoors that cannot be contained using a chemical spill kit (e.g. vehicle fuel leak), the Pollution Incident Response Management Plan will be activated, and appropriate notifications and clean-up will occur.

All operations associated with the Tyre Recycling Facility will be conducted indoors, with no tyres or processed rubber crumb materials being stored outdoors, avoiding possible impacts on stormwater. All activities associated with the development will comply with the *Fairfield City Council Stormwater Management Policy 2017*, and the *Fairfield City Development Control Plan 2013*.

The site is subject to local overland flooding, and is identified within the *Prospect Creek Flood Planning Map* (Figure 2.5) within the low flood risk precinct. The finished floor level of the development is above the 100-year flood level and can be adequately utilised to store goods above the 100-year flood level. The proposal will not include the storage of any polluting or potentially hazardous materials within

the 100-year flood levels. The existing building is constructed of predominantly concrete wall panels which will withstand the forces of floodwater, debris and buoyancy. The approved development is for works within an industrial development with similar uses surrounding. As a result, the Facility will not result in an increase the flood effect on the local area. No new building work or alterations to the existing building are proposed for the Facility.

### **2.2.3 Bushfire Prone Land**

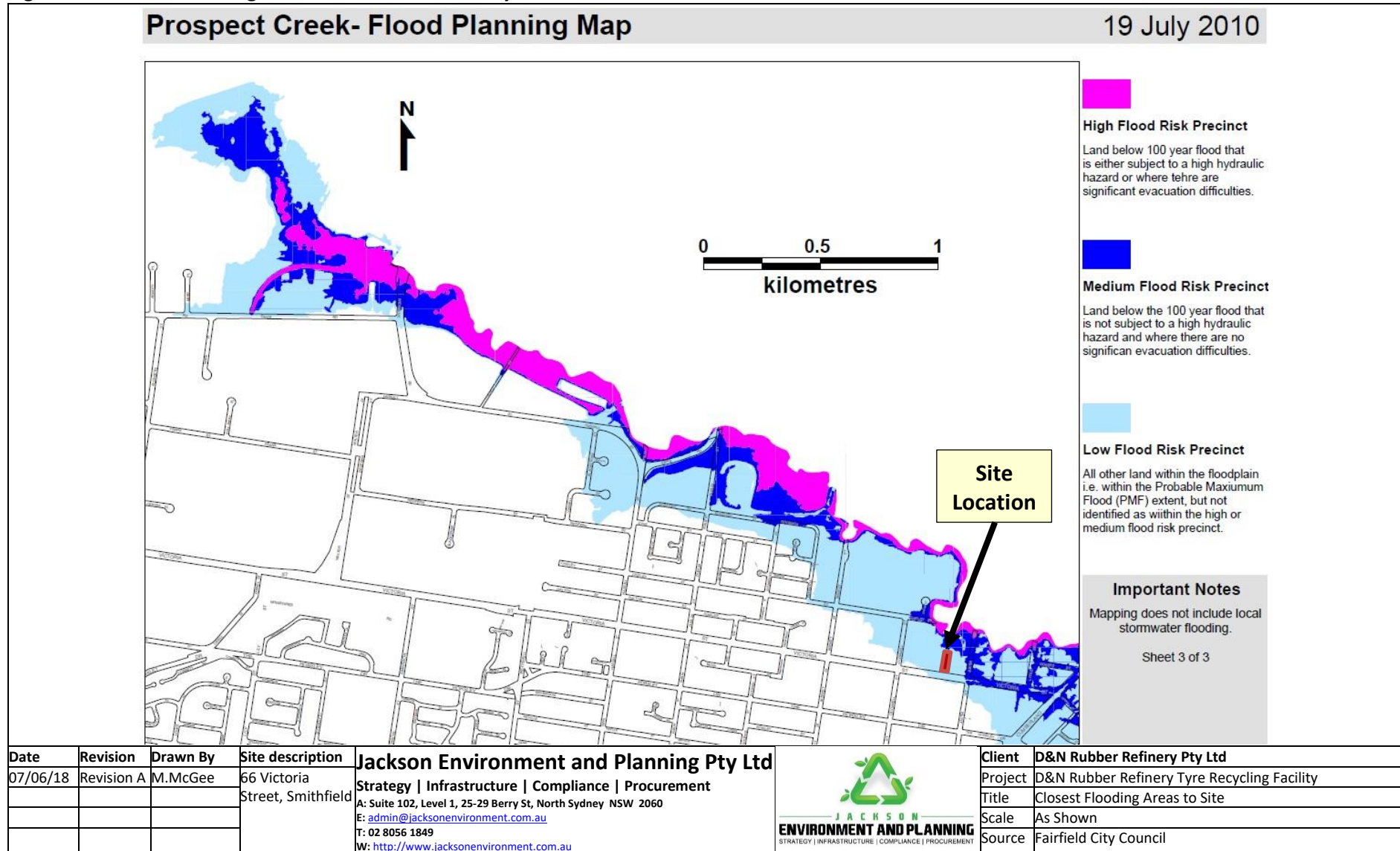
The site is not located in bushfire prone land (see Figure 2.6).

Figure 2.4. Location of sensitive receptors near site. Site is shown by a red arrow.



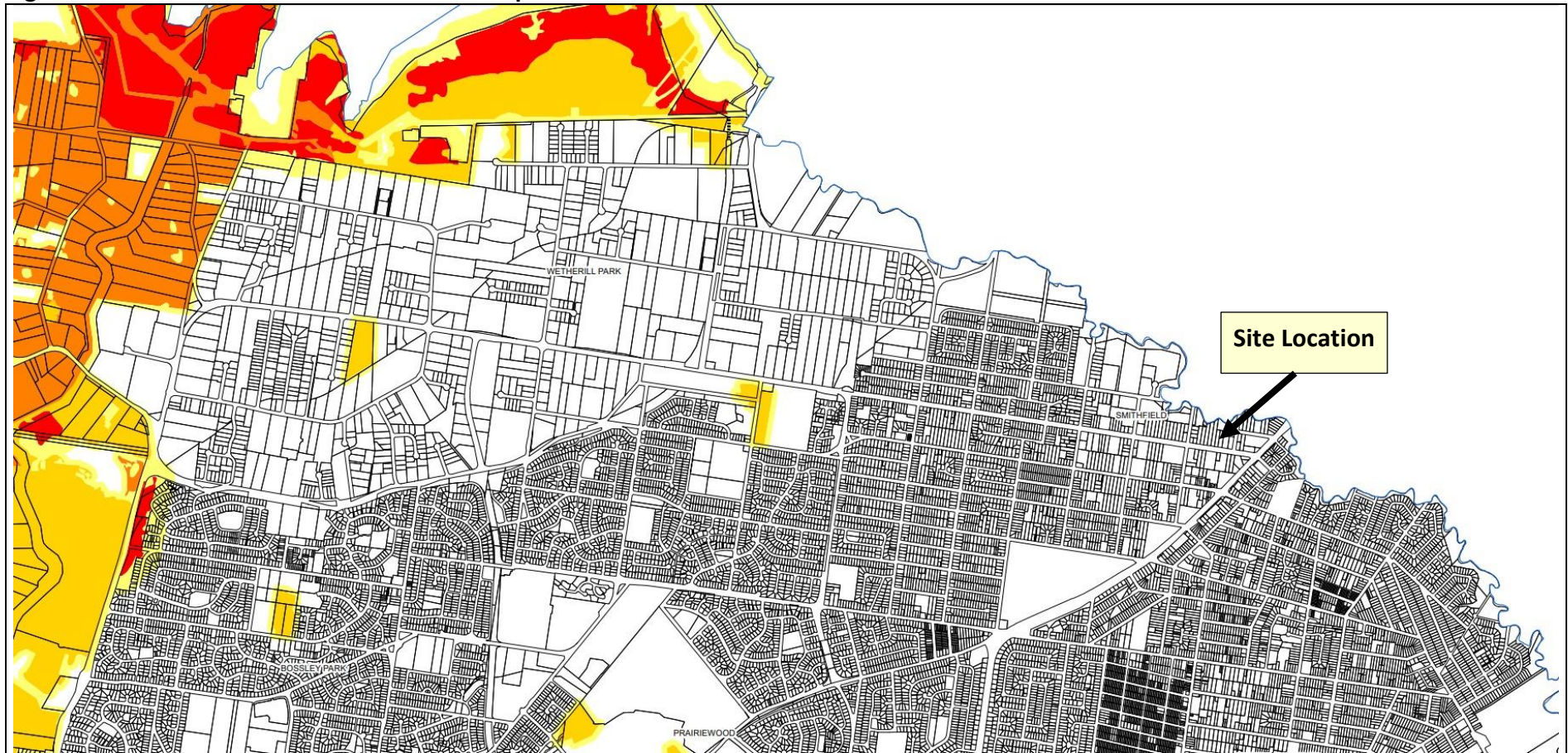
<b>Date</b>	<b>Revision</b>	<b>Drawn By</b>	<b>Site description</b>	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>	 <b>JACKSON</b> <b>ENVIRONMENT AND PLANNING</b> STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT	<b>Client</b>	<b>D&amp;N Rubber Refinery Pty Ltd</b>
05/06/18	Revision A	M. McGee	66 Victoria Street, Smithfield			<b>Project</b>	D&N Rubber Refinery Tyre Recycling Facility
						<b>Title</b>	Sensitive Receptors near Facility
						<b>Scale</b>	Not to Scale
						<b>Source</b>	Northstar Air Quality Pty Ltd

Figure 2.5. Closest flooding Areas to site. Site boundary is shown as a red box.



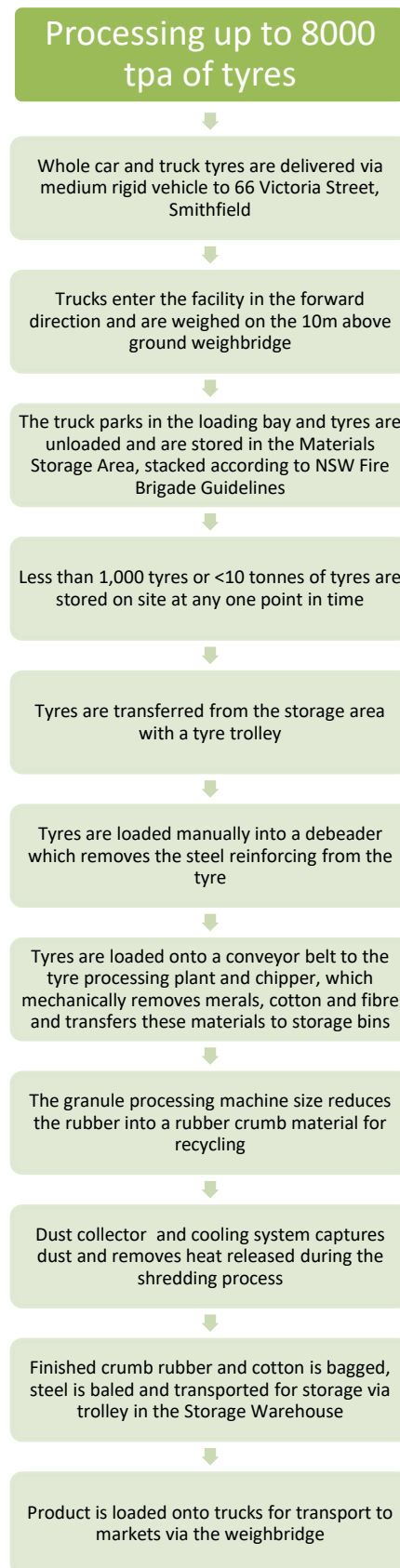


**Figure 2.6. Fairfield Council Bushfire Prone Map.**



<b>Date</b>	<b>Revision</b>	<b>Drawn By</b>	<b>Site description</b>	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>	 <b>JACKSON</b> <b>ENVIRONMENT AND PLANNING</b> STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT	<b>Client</b>	<b>D&amp;N Rubber Refinery Pty Ltd</b>
07/06/18	Revision A	M.McGee	66 Victoria Street, Smithfield			<b>Project</b>	D&N Rubber Refinery Tyre Recycling Facility
						<b>Title</b>	Fairfield Council Bushfire Prone Map
						<b>Scale</b>	As Shown
						<b>Source</b>	Fairfield City Council



**Figure 2.7 Overview of receiving and processing of tyres.**

### 3. Description and Likelihood of the Main Hazards

Proposed activities include:

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

From these 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 3.1).

**Table 3.1 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 3.2 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 3.2 Ranking of Pollution Incident.**

Type of Pollution	Hazard	Likelihood of Hazard occurring	Consequence	Risk Score
Chemical Spill	Fuel / oil	Unlikely	Minor	4
Excessive Dust Emissions	Dust	Possible	Insignificant	4
Fire	Heat, smoke and depletion of oxygen	Rare	Major	2
Noise	Hearing problems	Possible	Minor	3
Stormwater contamination	Carbonised water	Unlikely	Moderate	3
Natural Disaster	Personal injury / escape of stockpiles leading	Unlikely	Moderate	3

Type of Pollution	Hazard	Likelihood of Hazard occurring	Consequence	Risk Score
	to pollution of stormwater, air or soil			
Vehicle collision	Damage to man / material	Possible	Moderate	2
Litter	Health problems	Possible	Minor	3

**Table 3.3 Risk Matrix.**

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

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

#### 4. Pre-Emptive Actions to be taken

The main hazards, and the mitigation measures in place for each one, are shown below.



## 5. Inventory of Pollutants

**Table 5.1. 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; and
- Oil and 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
Engine oil	<700L	Store room

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

The storage and handling of the above pollutants are in accordance with:

- AS 1596:2014 The storage and handling of LP Gas
- AS 1940:2004 The storage and handling of flammable and combustible liquid
- AS 2030.1:2009 Gas cylinders – General requirements
- Storage and Handling of Dangerous Goods Code of Practice 2005.

## 6. Safety and Clean-Up Equipment

**Table 6.1. Type and Location of Safety and Clean-up Equipment.**

Equipment	Location
Spill kits	1 in Machinery area, 1 in store
Safety Data Sheets (SDS)	Office
First Aid Kit	Office
Fire extinguishers	5 at ground floor 1 at level 1 east 1 at level 1 west (locations given in Figure 6.1)
Fire hoses	Office
Fire Hydrant	Front of site, near Victoria St
Personal Protective Equipment	Worn by staff, spares in office
Traffic bollards and traffic cones	Loading bay / Office

Location of fire safety assets and services shown in Figure 6.1.

Figure 6.1. Fire safety assets and services diagram for 66 Victoria Street, Smithfield.

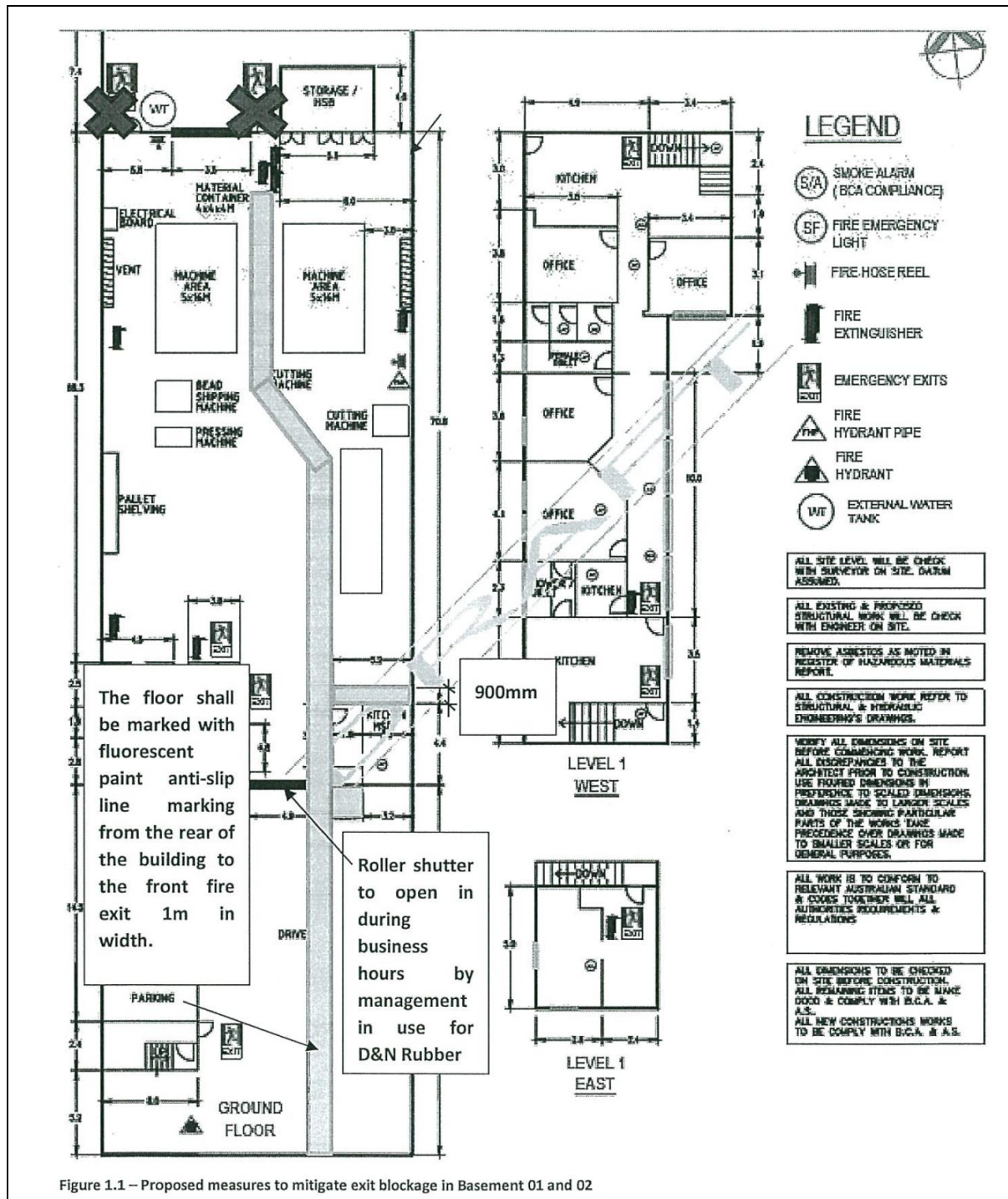


Figure 1.1 – Proposed measures to mitigate exit blockage in Basement 01 and 02

Date	Revision	Drawn By	Site description	Client	D&N Rubber Refinery Pty Ltd
17/07/17	Revision A	M. McGee	66 Victoria Street, Smithfield	Project	D&N Rubber Refinery Tyre Recycling Facility
				Title	Fire safety assets and services
				Source	Austech Australia

**Jackson Environment and Planning Pty Ltd**

Strategy | Infrastructure | Compliance | Procurement

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## 7. Contact Details and Responsible Persons

The person responsible for implementing this plan is (to be confirmed).

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

Primary site  
contact

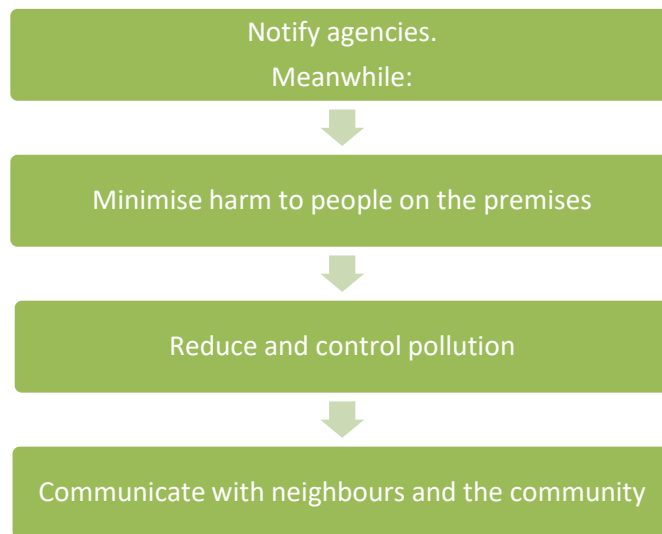
- General Manager or Director

Secondary site  
contact

- Operations Manager



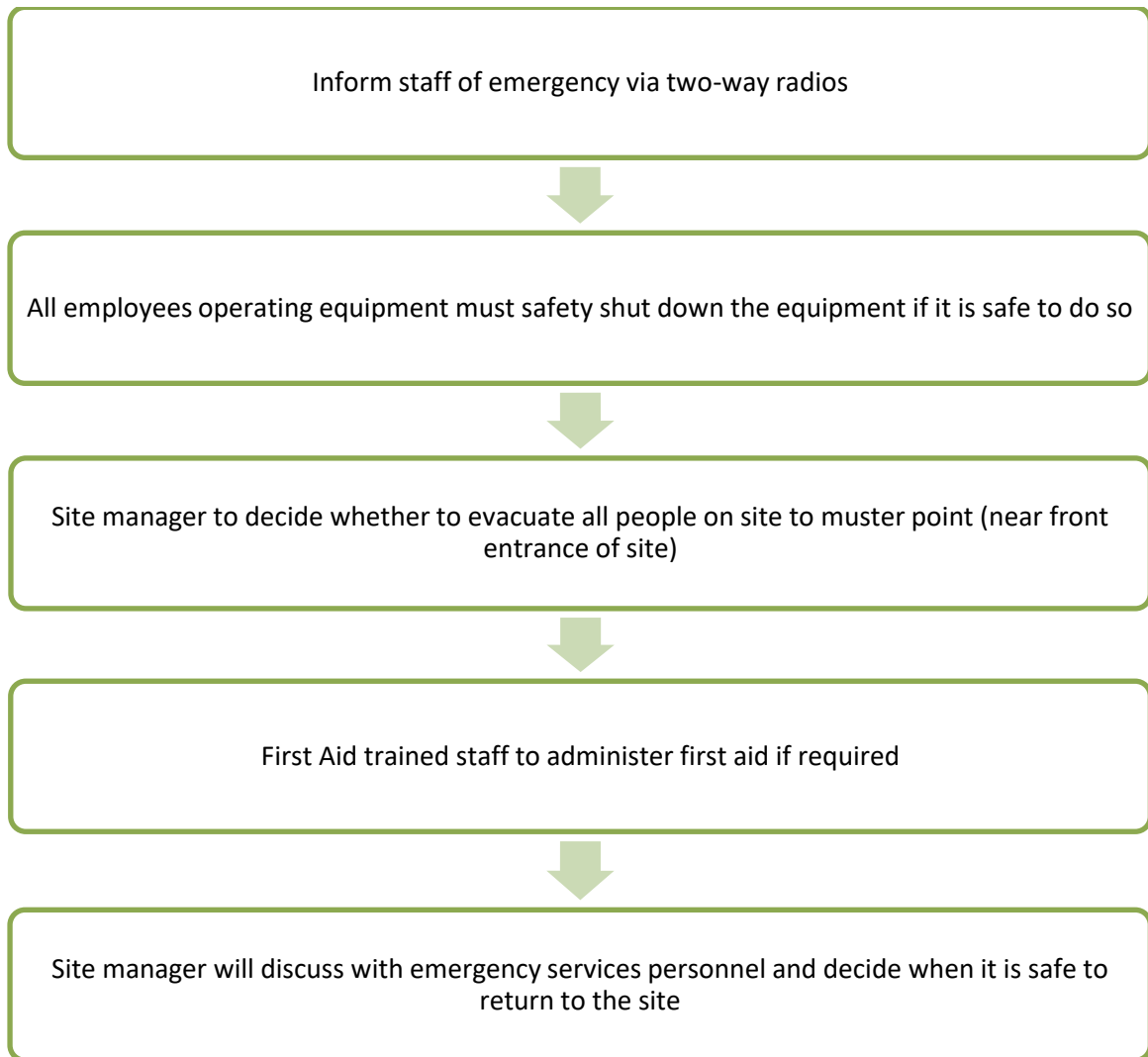
## 8. Actions to Be Taken During or Immediately After a Pollution Incident



### 8.1 Notify Agencies



## 8.2 Minimise Harm to People on the Premises



### 8.3 Reduce and Control Pollution



#### 8.4 Communicate with Neighbours and the Community

Is there potential for off-site impacts to the community or environment? If yes, then contact the following business via telephone or where appropriate via door knocking.

**Table 8.1. Contact Details for Adjacent Businesses.**

Adress	Owner	Contact
46 Victoria St	National Trailers and Campers	(02) 8798 4123
49-63 Victoria St	United Electrical Supplies	(02) 9729 3377
49-63 Victoria St	Proma Air Conditioners	(02) 9748 4700
60 Victoria St	Global Signs	(02) 9729 0139
64 Victoria St	Tools Warehouse	(02) 8711 1980
68 Victoria St	Wexford Welding	(02) 9604 5526
69 Victoria St	Mototech	(02) 9725 5600
73 Victoria St	Eclipse Environmental	(02) 9757 1212
78 Victoria St	Impact International	(02) 9604 5133
39 Justin St	Hi-Class Mechanical Repairs	(02) 9609 2374
41 Justin St	Dalmar Body Repairs	(02) 9725 1762
42 Justin St	Save Body Repairs	(02) 8712 8975
43 Justin St	ATRA Mechanical Repairs	(02) 9725 1525
44-46 Justin St	Oz Car Parts	(02) 9609 3333
45 Justin St	HEQS Group	(02) 8740 5642
48 Justin St	Bestwood	0412 377 220
52 Justin St	Cowdroy	1300 269 376

## 9. Staff Training and Testing This Plan

### 9.1 Staff Training

All new employees will be made aware of the requirements 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.

### 9.2 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 be implemented.



Records will be kept of the reviews and drills, their outcomes and any improvements identified and implemented.

**Figure 9.1. Emergency evacuation muster point.**



Date	Revision	Drawn By	Site description	<b>Jackson Environment and Planning Pty Ltd</b> Strategy   Infrastructure   Compliance   Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: <a href="mailto:admin@jacksonenvironment.com.au">admin@jacksonenvironment.com.au</a> T: 02 8056 1849 W: <a href="http://www.jacksonenvironment.com.au">http://www.jacksonenvironment.com.au</a>	 <b>JACKSON</b> <b>ENVIRONMENT AND PLANNING</b> STRATEGY   INFRASTRUCTURE   COMPLIANCE   PROCUREMENT	Client	Rubbish Mining Company Pty Ltd
08/02/18	Revision A	M.McGee	920 Richmond Road, Marsden Park			Project	Waste Storage and Processing Facility
						Title	Emergency evacuation points
						Scale	Not to Scale
						Source	Department of Planning and Environment NSW