



Pollution Incident Response Management Plan (“PIRMP”)

PCRF at 87-91 Lisbon St. Fairfield

A handwritten signature in black ink, appearing to read 'Ian Craig', is positioned above the approval text.

Approved by **Iain Craig** Account Relationship Manager

Scope of Validity: Doyle Bros – Pollution Incident Management Plan		Page 1 of 19	
Originator / Reviewer: Iain Craig	Reviewed By: Bjorn Fahle	Approved By: Iain Craig	Revision Number: 03
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**Pollution Incident Response Management (PIRMP) Plan for
PCRF East Fairfield**

Issue date: 05/09/19
Review date: 05/03/20

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Issue	Date	Reason for Change		Employee Name
01	5/09/19	Original		Iain Craig
	08/09/19	Test		Iain Craig
02	05/03/20	Review		Iain Craig
03	02/09/20	Annual Review		Iain Craig

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PURPOSE

Faralga Pty Limited trading as Doyle Bros holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Doyle Bros Fairfield East. 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 on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act. A written copy of this plan is kept at 87-91 Lisbon Street, Fairfield East NSW 2165, and will be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan. Parts of the plan are also available at www.doylebros.com.au a copy of the plan will also be issued to any person who makes a written request. This complies to section 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan is developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.

As holder of EPA Licence Number 20464, the Licensees are preparing this PIRMP in accordance with section 153A of the Protection of the Environment Operations Act 1997 (POEO Act).

SCOPE

This PIRMP will be used as a “First Response” guide for all types of pollution incidents that may occur on the Doyle Bros Fairfield East site. This includes the following:

Protection Priorities:	Doyle Bros Fairfield East protection priorities, in the event of an emergency, include: <ul style="list-style-type: none"> • Safety of People; • Protection of the Environment; and • The safeguarding of Commercial operations.
Prevention and Reporting:	The prevention and reporting of hazards, accidents, occurrences and emergency situations are documented in the Doyle Bros Work Health & Safety Management System, which applies to the Doyle Bros Fairfield East site.
Preparedness:	The Doyle Bros Fairfield East site Emergency Response Team is adequately prepared and trained for an occurrence and processes and procedures are in place. These include: <ul style="list-style-type: none"> • Collecting and collating data and documentation to assist them in implementing their role more effectively. For example, contacts, maps, records, reports, etc.; • Identifying and maintaining contact details of possible support personnel or organisations that may be of assistance in the event of an emergency; • Training (including the induction of new staff) is organised and conducted;

	<ul style="list-style-type: none"> • Emergency Evacuations Plans are kept up to date; • A minimum of one evacuation drill per year is conducted onsite, and the details are documented.
Definitions:	<p>EPA – Environment Protection Authority</p> <p>Pollution - The release of an impurity or other substance that contaminates or degrades air, land or water.</p> <p>Pollution Incident – An event or set of circumstances, either intentional or deliberate, where pollution occurs or is likely to occur.</p> <p>PIRMPs – Pollution Incident Response Management Plans</p> <p>POEO Act – Protection of the Environment Operations Act 1997</p> <p>PEOE Regulation - Protection of the Environment Operations (General) Regulation 2009</p> <p>SMP – Site Management Plan</p> <p>EMP – Emergency Management Plan</p> <p>The Site – Doyle Bros Fairfield East</p>
References:	<ul style="list-style-type: none"> • Doyle Bros Integrated Management System • EPA’s Waste Disposal Guidelines • Doyle Bros Emergency Management Plan • Doyle Bros Environmental Management Plan

Environment Protection Licence (EPL) Details

Name of licensee: (including ABN)	Faralga Pty Limited (ABN: 60 126 816 939)
EPL number:	20646
Premises name and address:	Doyle Bros Fairfield East 87-91 Lisbon Street, Fairfield East NSW 2165

Company or business contact details

Name:	Paul Doyle
Position or title:	Managing Director
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0412 330 052

Email:	paul.doyle@doylebros.com.au
Name:	Aaron Doyle
Position or title:	Operations Manager
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0437 287 712
Email:	aaron.doyle@doylebros.com.au
Name:	Ian Craig
Position or title:	Account Relationship Manager
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0414 411 192
Email:	iain.craig@doylebros.com.au
Website address:	www.doylebros.com.au
Scheduled activity/activities on EPL:	Resource recovery Waste storage
Fee based activity/activities on EPL:	Recovery of general waste Waste storage – other types of waste
Size & Complexity	Total area = 2734 m2 (First Floor = 179 m2, Ground Floor Amen. = 177 m2, Warehouse = 2378 m2)

Pollution incident – Person/s responsible

PIRMP activation	
Name of responsible person:	Graham O'Malley
Position or title:	MRF Supervisor
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0468 623 144

Email:	
Notifying relevant authorities – the following Doyle Bros representatives are responsible for informing any relevant authority of any actual or potential pollution incident:	
Name of responsible person:	Ian Craig
Position or title:	Account Relationship Manager
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0414 411 192
Email:	iain.craig@doylebros.com.au
Managing response to pollution incident – the following Doyle Bros representatives will manage and co-ordinate all activities relating to the response to any pollution incident:	
Name of responsible person:	Ian Craig
Position or title:	Account Relationship Manager
Business hours contact number/s:	02 9999 2111
After hours contact number/s:	0414 411 192
Email:	iain.craig@doylebros.com.au

Notification of relevant authorities

The relevant authorities listed below may be required to be notified as per Part 5.7A of the POEO Act in case of a pollution incident that causes or threatens to cause material harm to the environment:

1. Fire & Rescue NSW and/or Emergency Services as applicable – 000 (first notification)
2. Environment Protection Authority – 131 555
3. Health NSW (first instance Liverpool Public Health Unit (South Western Sydney LHD):
 - a. P.O. Box 38, Liverpool BC NSW 1871
 - b. Phone: (02) 8778 0855
 - c. Fax: (02) 8778 0838
 - d. After hours Phone: (02) 9828 3000
 - e. (Liverpool Hospital) - ask for Public Health Officer on call
4. SafeWork NSW – 131 050
5. Local authority (usually the local council) in which the pollution has occurred
6. Water NSW (Emergency reporting - 24 hours (fires, chemical spills) – 1800 061 069

Notification of neighbours and the local community

Doyle Bros Fairfield East is not located in an area neither neighbouring or nearby hospitals, schools, childcare centres, aged care facilities or any other sensitive premises.

Neighbouring properties and businesses will be contacted in the event of any pollution incident by telephone and door knocking (if safe to do so). The Doyle Bros Fairfield East emergency alarm system will also warn neighbouring businesses of the events occurrence. The key adjoining neighbours/businesses are:

Name	Role	Organisation	Contact Details
Anthony Ngaue	Safety and Security	Fantastic Furniture	0431 278 619 71 Seville Street Fairfield East NSW 2165
Gary Walker	Director	Belmont Timbers	(02) 9681 2100 75 Lisbon Street Fairfield NSW 2165
Phil MacMillan	Assistant Allocation	Murphy Transport	0425 804 100 97B Lisbon Street Fairfield NSW 2165
Reception	Reception	Used Earth Moving Equipment "Behind"	(02) 9892 3300 104 Fairfield Street Fairfield East, NSW 2165
Karen	Reception	TR Savage & Son Manufacturing Engineering "Behind"	(02) 9681 7888 102 Fairfield Street Fairfield, NSW 2165

The site and its Hazards

- A site description with map is provided in Appendix 1 of this document;
- An inventory of pollutants is available at the sites reception and weighbridge areas, Appendix 2 of this document outlines the details captured for all potential pollutants;
- A description of potential hazards and their likelihoods is provided in Appendix 3 of this document.

Pre-emptive actions

Assisted by a SMP the following pre-emptive actions are in place to minimise the risk to humans and the environment from pollution incidents:

- Surveillance (both general & of vehicles entering the site) to detect and manage illegal and hazardous wastes (e.g. asbestos);
- Control measures to ensure that the site is always operating to the conditions of the NSW EPA Licence;
- Fire Management protocols;
- Air pollution management;
- Noise management;
- Diesel tank maintained with double skin;
- Diesel tank bunding maintained;
- Stormwater management & monitoring;
- A groundwater monitoring program;
- All equipment must be maintained in good working order;
- All fire equipment, motors, pumps and hoses are maintained in good working order and tested/certified/replaced as per manufacturers specifications; and
- Safety equipment is provided as shown in Section 5 below.

Safety Equipment

The safety equipment in place for pollution incidents is detailed in the following table:

Equipment	Location(s)	Comments
Fire extinguishers – Office	Fire Ext (A:B(E)) – At top of stairwell at front entrance to office. Fire Ext (Co2) – In Kitchen	All units tested and tagged
Fire extinguishers - Warehouse	Fire Ext (Co2) – Under stairwell in passageway to storage room. Fire Ext (A:B(E)) – Inside caged bin area outside Warehouse Kitchen Door. Fire Ext (A:B(E)) – In Warehouse kitchen Fire Ext (A:B(E)) – Inside Warehouse Front Roller Door Fire Hose Reel – Inside Warehouse Front Roller Door Fire Ext (A:B(E)) – Inside Middle Roller Door Fire Hose Reel – Inside Middle Roller Door Fire Ext (A:B(E)) – Between Middle and Rear Roller Doors Fire Hose Reel – Inside Rear Roller Door Fire Ext (A:B(E)) – Far side wall behind American Baler Fire Ext (A:B(E)) – Far side wall Shredder and Processing Station.	All units tested and tagged
Spill kits	Fuel Cell, Workshop & Collection vehicles	1 unit in each Doyle Bros collection vehicle
First aid kits	Office – Kitchen area Warehouse – kitchen area	
SDS or MSDS Register	Office – Reception & Warehouse - weighbridge	
Stick proof gloves	Warehouse	Mandatory use for all staff
Dust masks	Warehouse	Mandatory use for all staff
Safety glasses	Warehouse	Mandatory use for all staff
Torch	Workshop & Stores	

Minimising Harm to Persons on the Premises

The following are in place to assist in minimising harm to staff and visitors:

1. An Emergency Plan covering evacuation procedure including Assembly Area;
2. Operatives trained as Emergency Wardens;
3. Operatives trained in first aid;
4. Emergency exercises;
5. Landline and mobile phone services for external communication;

6. A reporting protocol (see Section 11 of this Plan) allows prompt emergency response from emergency services and Council's own personnel.

Reporting Pollution Incidents

Immediate Reporting

In all situations, the 24-hour emergency number for Doyle Bros Fairfield East is 0497 778 882. At all times these calls are taken by the Recycling & Operations Manager. If the incident poses an immediate threat to human health or safety the absolute priority is calling 000. Then proceed with the following as required:

- Any environmental or pollution incidents must be reported immediately to the Recycling & Operations Manager 0497 778 882 in line with the IMS document "Emergency Management Plan". Then, if a supervisor is not already aware of the incident, immediately call a supervisor or manager by making calls in the order listed under "4. Company or business contact details" until contact is made with one of the contacts. Reporting continues up the line until the level of Coordinator where a decision is made on whether to notify external authorities.

Internal incident reports are investigated, and corrective actions instigated in accordance with IMS procedures.

Notifying External Authorities

Notification to relevant authorities is required immediately if any of the following circumstances occur as a result of a pollution incident:

1. There is actual or potential harm to the environment that is not trivial;
2. There is actual or potential harm to human health or safety;
3. Clean-up costs are expected to be over \$10,000

Generally, this will occur at the level of coordinator (or someone delegated by the coordinator). However, if personal contact cannot be made with any of the supervisors or managers listed then a staff member aware of a pollution incident causing (1) or (2) or (3) must immediately call the relevant external authorities.

Notification is made by contacting all relevant authorities listed under Notification of Relevant Authorities (Section 6 of this Plan). Contact must be made in the order shown in the list.

Responding to Pollution Incidents

Illegal Asbestos

- If handled inappropriately asbestos can be a major health hazard to workers and the public;
- Asbestos must be managed in line with SMP. Asbestos is not permitted to be received by Doyle Bros Fairfield East as per NSW EPA Licence conditions.

Fire in processing line

- If safe to do so small surface fires can be isolated;
- A larger fire must be reported to the fire brigade before consulting with the Recycling and Operations Manager to determine if it is safe to isolate.

Fire in PEF or Paper/Cardboard Bales

- Generally, these are smouldering fires and can often be readily isolated from the rest of the waste using heavy machinery on site or alternative and appropriate equipment;
- If safe to do so, the waste can be spread thinly and hosed down until smouldering ceases.

Waste Oil Leaks

- Try to control the source by collecting it in a clean bucket or similar container;
- If the source of the spill is a pin-hole leak in the Waste Oil Tank a self-tapping screw can be used to plug the hole;
- Consider whether a pump-out is required to be booked for the Waste Oil Tank to allow room for any oil collected or to allow the tank to be repaired;
- Oil collected in a container (without absorbent) can be placed in the Waste Oil Tank;
- If the Waste Oil Tank is damaged, collected oil may have to be stored in a container(s) until the Tank can be repaired;
- For smaller spills the spill kit absorbent can be used to soak up the oil;
- Larger spills may require further containment measures to apply absorbents(s) to soak up the spill;
- Absorbent materials cannot be placed in the Waste Oil Tank;
- Oil soaked soil or absorbent material needs to be disposed of in accordance with the EPA's Waste Disposal Guidelines.

Hydraulic Hose Leaks

- When a leak occurs from a vehicle leave the vehicle where it is and turn it off (in the case of the heavy machinery on site lower the bucket before switching off);
- Then respond as per previous section for 'Waste Oil Leaks'.

Staff Training

Management aims to ensure Doyle Bros staff are competent in key functional areas, that ongoing training is provided, and currency of training is monitored throughout their period of employment with Doyle Bros.

Records of training currency are maintained by the IMS. The IMS tracks expiry dates and arranges appropriate training as necessary and annual employee reviews are conducted to identify all required training needs. Specific site related training includes:

- Chemical users and handling certificates;
- Safe operation of plant and equipment;
- Safe operation of the recycling and processing line;
- Inspection training;
- Plant Operation;
- Electrical safety;
- First aid, and
- Asbestos awareness.

Testing the Plan

Mock emergency response training events for the premises are held at least annually and can include desktop exercises and practical exercises or drills. These events are utilised to demonstrate readiness and refine responses to specific scenarios for which Emergency Scenario Responses have been

documented. De-briefing after the training event allows for further staff consultation and procedural refinement of the response.

Within one month of a pollution incident occurring an additional test of the PIRMP will be conducted to assess, considering that incident, whether the relevant responses are able to be implemented in an effective manner.

Details of all tests must be recorded in the following table:

Testing Table

Date	Aspects/Scenarios Tested	Personnel Involved
9/10/19	Desktop test of complete plan	Bjorn Fahle, Iain Craig, Paul Doyle

Document Review & History

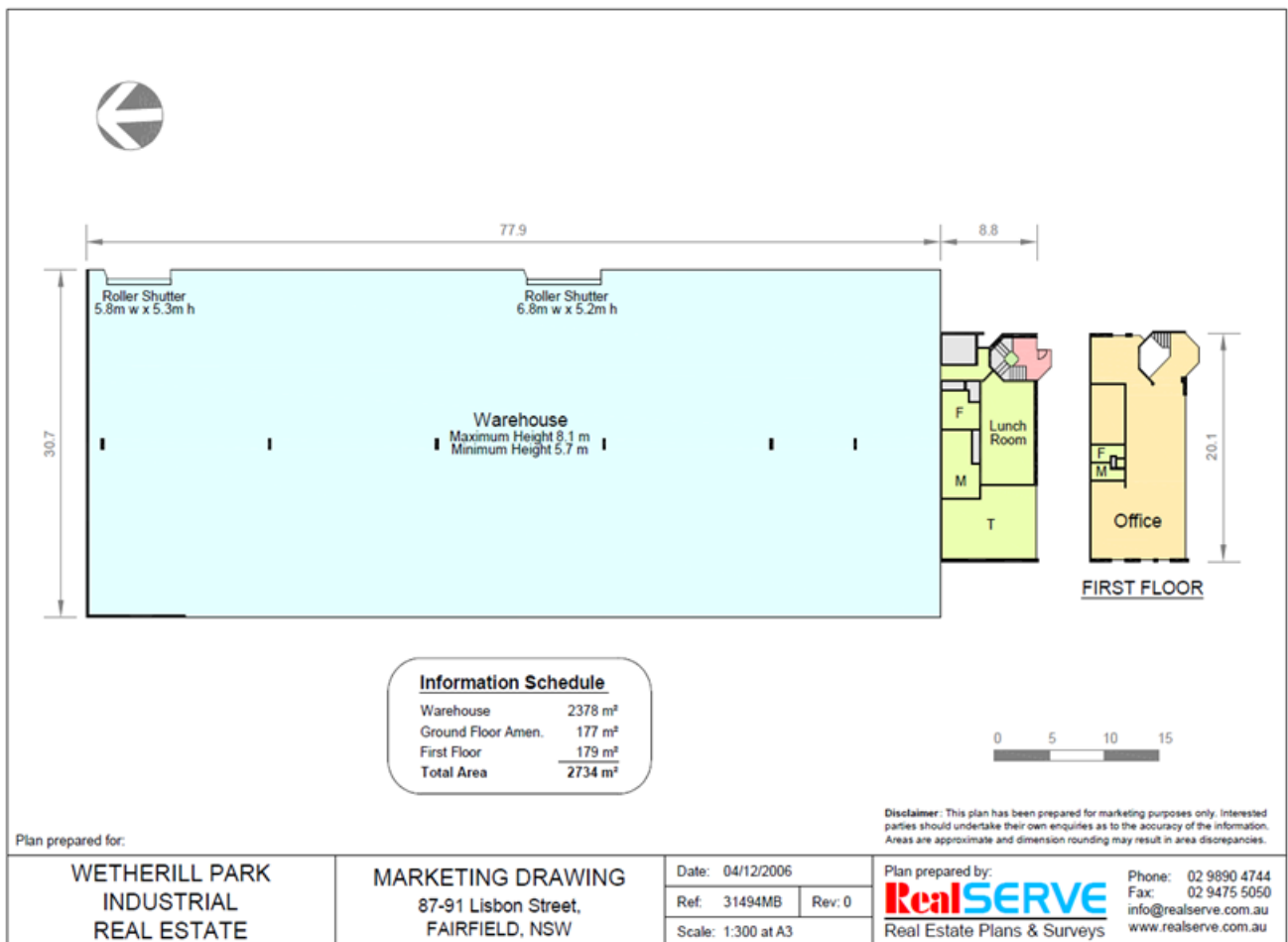
Version	Date	Modifications	Author	Approver
1.0	5/9/19	Implementation of PIRMP	Iain Craig	Iain Craig
1.1	02/09/20	Annual Review	Iain Craig	Iain Craig

Review

This procedure is to be reviewed as required and at least annually.

APPENDIX 1 – Site Description

Incident Response Plan for site:	
Doyle Bros Fairfield East 87-91 Lisbon Street, Fairfield East NSW 2165	Licence number: 20646 Scheduled Activity: Resource Recovery and Waste Storage
<p>Overview of site activities:</p> <p>The primary activities undertaken at the Doyle Bros Fairfield East site include:</p> <ul style="list-style-type: none"> • Waste and recycling receipt; • Waste and recycling sorting; • Storage of recyclable items; • Production of Processed Engineered Fuels (PEF); • Refuelling - diesel fuel cell on site; • Hazardous chemical storage; • Oil Storage; • Aggregation and transport of general waste from site; • Storage of collection vehicles; • Waste administration. <p>Staff on site:</p> <p>Weekday – 18 collection drivers, 9 administration, 3 recycling and waste operations</p> <p>Weekend – 2 collection driver, 1 recycling and waste operations</p>	
<p>Description of surrounding area:</p> <p>The Doyle Bros Fairfield East Resource Recovery and Recycling Facility is surrounded mainly by heavy industrial neighbours conducting warehousing, manufacturing and distribution activities. and industrial activities to the north, south, east and west.</p>	
<p>Site Map:</p> <p>Plans for the site are detailed below.</p> <p>The second diagram is that of the emergency assembly area.</p>	



EMERGENCY GUIDELINES

REMOVE

- Yourself and others from Danger

ALARM

Raise the Alarm

- Tell Warden
- Alert Others
- Notify Emergency Services
- Dial '000'

CONTAIN

The Fire

- Use correct Fire Fighting Equipment
- Only if safe and if you are trained

EVACUATE

If Smoke or Fire is Dangerous

- Take others with you
- Close doors behind you
- Do NOT lock them

Doyle Bros
Resource Recovery

GROUND FLOOR

Site Maps/Drawings showing all relevant details:

Area	Plan
First Floor	
Ground Floor	

Ground Floor Canteen

EMERGENCY GUIDELINES

REMOVE

- Yourself and others from Danger

ALARM

Raise the Alarm

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CONTAIN

The Fire

- Use correct Fire Fighting Equipment
- Only if safe and if you are trained

EVACUATE

If Smoke or Fire is Dangerous

- Take others with you
- Close doors behind you
- Do NOT lock them

GO TO YOUR ASSEMBLY AREA
DO NOT COLLECT BELONGINGS
DO NOT RE-ENTER UNTIL AUTHORISED

Doyle Bros
Resource Recovery
87-91 LISBON STREET, FAIRFIELD EAST

GROUND FLOOR

WAREHOUSE

YARD

ENTRY/EXIT

EMERGENCY ASSEMBLY AREA

LEGEND:

- CO₂ Extinguisher
- DCP Extinguisher
- Exits
- Fire Hose Reel
- Fire Indicator Panel
- Roller Door

S&R BECKETT FIRE & EMERGENCY SOLUTIONS

APPENDIX 2 – Inventory of Hazardous Products

Doyle Bros hold a detailed list of all hazardous products, chemicals, fuels and all other potential pollutants. This inventory list is regularly updated and available at both reception and the weighbridge area.

The following table lists the details held on file for all hazardous products used on site in any quantities:

- Cas No;
- Chemical Name;
- Manufacturers Name;
- Maximum quantity per unit and in total volume or kilograms;
- DG Classification;
- Sub risk;
- Packaging Group (I, II, or III);
- Safety Data Sheets (updated minimum of 5 years);
- Storage Location;
- HAZCHEM Code.

The site can also contain the following solid and wastes with pollution potential:

Waste	Storage Location	Typical Quantity	Licensed Limit
Carboard/Paper	Warehouse	50-200 metric tonne	The authorised amount of waste permitted on the premises cannot exceed 250 tonnes at any one time.
Processed Engineered Fuel	Warehouse	50-200 metric tonne	
General Waste	Warehouse		

APPENDIX 3 - Description and Likelihoods of Hazards

Register 6 - Risk/Hazard Register											Last Update		26/03/2018	
No.	Date	ID by	Description of risk/hazard	Location	Category	Impact of risk/hazard	Level of risk (likelihood and consequence) H, M, L	What are the current controls?	Are further controls required?	How will the controls be implemented?	Action by	Target Date	Status	
15/1	26-Feb-15	PD, IQ	Fire/explosion in facility	Facility	Safety/ Environment	Worker injury Loss of business	L/M	Smoke detectors/fire alarms Supervision and procedures to ensure low stock (hence fuel) levels Smoking banned on all facilities and workshops. Procedures for storage and handling of flammable material.	Y	Engage Fire Consultant to develop Fire/Emergency plan	PD	30-Mar-15	In progress	
15/6	26-Feb-15	PD, IQ	Electric shock	Facility	Safety	Worker injury	L/M	Residual Current Device Induction training on Electrical safety Electrical equipment procedure Electrical equipment register Electrical work only to be performed by licensed electricians Preventative Maintenance Program Workplace Inspections	N	Test and tag electrical equipment	IQ	30-Apr-15		
15/7	26-Feb-15	PD, IQ	Equipment failure preventing plant operations	Facility	Business	Loss of business. Accumulation of material	L	Maintenance program, SWMS	N					
15/9	26-Feb-15	PD, IQ	Excessive noise from plant	Facility	Safety/ Environment	Worker hearing damage. Noise complaints	L	Plants located in industrial areas. PPE. Maintenance program.	N					
15/10	26-Feb-15	PD, IQ	Exposure to smoke, hazardous fumes	Facility	Safety	Worker injury	L	Maintenance program, PPE, Appropriate storage and handling of Hazardous Substances, Supervision	N					
15/11	26-Feb-15	PD, IQ	Coming in contact with hazardous waste (eg biological, needle sticks)	Facility	Safety	Worker injury	L	Control at source with customer. PPE- gloves, leather forearm protectors Training	N					
15/13	26-Feb-15	PD, IQ	Collision of plant with other vehicles/objects	Facility	Safety/ Business	Worker injury Property damage	L	Vehicle maintenance program Signage and markings to RTA and WorkCover requirements Driver qualifications and training	N					
15/16	26-Feb-15	PD, IQ	Incorrect operation of equipment	Facility	Safety	Worker injury	L	Provision of emergency stop, warning alarms, control devices in accordance with operation and safety procedure. SWMS, operator qualification and training	N					
15/17	26-Feb-15	PD, IQ	Spillage and debris on road creating safety and environmental hazards during collection	Trucks	Environment	Environmental damage	L	Vehicle maintenance Loading in accordance with the and safety procedure. Driver training	N					

Please find extraction of relevant risks for potential pollution events. This extract is directly copied from the Doyle Bros "Register 6 – Risk/Hazard Register".