POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

THE COBRA GROUP (AUST) PTY LTD 30-32 BENT STREET ST MARYS NSW 2760

PREPARED BY: THE COBRA GROUP (AUST) PTY LTD AUTHORISED BY: RAED YKMOUR – MANAGER DATE: 17th September 2024

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1.0 – INTRODUCTION

1.1 – FACILITY DESCRIPTION

The Cobra Group (Aust) Pty Ltd operates a waste transfer facility (storage & recycling) at 30-32 Bent Street, St Marys located in the Dunheved Business Park - South. A map of the location and surrounding area is attached - Appendix 1. This location has been a waste transfer facility since 2018. The Cobra Group (Aust) Pty Ltd is a licensed waste resource recovery and waste storage facility with the Environmental Protection Authority (EPA) Licence No: 21011.

The total site area is approximately 8,205 square metres. The building has an area of approximately 2,088 square metres and is constructed of steel sheeting and concrete panels.

The Cobra Group (Aust) Pty Ltd operates a skip bin business trading as 'Cobra Waste Solutions', which involves the collection of waste bins containing building and demolition waste transported to the site for sorting and recycling. No liquid trade wastes, chemicals, hazardous materials such as asbestos or contaminated soil are accepted for receipt or recycling. The annual operating capacity is 10,000 tonnes.

1.2 – POLLUTION INCIDENTS

A pollution incident is an incident where there is or likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred or is likely to occur. Typical pollution incidents include dust emissions, spills and/or leaks and fire and/or explosions.

2.0 – CONTACT DETAILS

2.1 – POLLUTION INCIDENT TEAM

TITLE	NAME	TELEPHONE
Manager	Raed Ykmour	0404 955 555 All hours
Chief Warden	Ali Jalloul	(02) 8798 8540
Deputy Chief Warden	Hassan Jalloul	(02) 8798 8540
Communications Officers	Sarah Hamdi	(02) 8798 8540

2.2 – EMERGENCY SERVICE CONTACTS

SERVICE	TELEPHONE
Fire Brigade	1300 729 579
Police	000
Ambulance	000
EPA	131 555
Workcover	131 050
Ministry of Health - Nepean Blue Mountains	(02) 4734 2000
Penrith City Council	(02) 4732 7777
Water	132 090
Gas	131 909
Electricity	131 003

2.3 – NEIGHBOUR CONTACTS

BUSINESS	ADDRESS	TELEPHONE
Chemcolour Industries	19-25 Anne St, St Marys	(02) 8801 8100
Winston Express Haulage	16-22 Bent St, St Marys	(02) 9835 1000
Bent Street Burger Shop	1/26 Bent St, St Marys	(02) 9833 3055
Dannykay Antiques	2/26 Bent St, St Marys	(02) 9673 6536
DC Satellite	3&4/26 Bent St, St Marys	(02) 8840 8501
Total Fit Shopfittings	5/26 Bent St, St Marys	0418 264 412
Brazier Freight Co Pty Ltd	28 Bent St, St Marys	(02) 9623 8809

2.4 – DISTRIBUTION LIST

Copies of the Pollution Incident Response Management Plan are located in the Emergency Manifests at the two site entrances and in the Hazard Communication Station in the office.

3.0 - AIMS AND OBJECTIVES OF THE PLAN

3.1 - AIM

The aim of the Pollution Incident Response Management Plan is to set out procedures to be followed in the event of a pollution incident.

3.2 – OBJECTIVES

The objectives of the Pollution Incident Response Management Plan are to:-

- Minimise and control the risk of a pollution incident or potential pollution incidents occurring at our facility
- Identify the risks and develop pollution incident response procedures to minimise and manage those risks
- Facilitate emergency response and provide assistance on site as is appropriate to the situation
- Ensure that all vital information about a pollution incident is **immediately** communicated to relevant persons including employees, relevant authorities and community members living or working in the vicinity of the facility who may be affected
- Facilitate the reorganisation and recovery operations so that normal operations can be resumed
- Provide relevant pollution incident response training so that a high level of continuous emergency preparedness is maintained
- Provide a basis for the revision of pollution incident response procedures

4.0 – POTENTIAL HAZARDS & LIKELIHOOD OF OCCURRENCE

Potential hazards to human health and the environment from the activities performed at our facility are limited.

The potential hazards include dust emissions, spills and/or leaks and fire and/or explosions. The likelihood of such potential hazards occurring are minimised by evaluating the level of risk and implementing measures to effectively control those risks.

Energy sources currently used at our facility include electricity. The location of the power main is marked on the plan of premises included in Appendix 2.

5.0 – POLLUTION INCIDENTS AND RESPONSES

5.1 – POLLUTION INCIDENT RESPONSE PROCEDURE

In the event of a pollution incident the Chief Warden shall:-

- Assume responsibility for all staff and visitors on site until the responsibility can be handed over to the senior officer of the attending Emergency Service
- Respond to and co-ordinate the incident
- Notify management and the relevant Emergency Service(s) of the type and location of the incident
- Decide if an evacuation is appropriate and notify staff and visitors
- Turn off the power as soon as possible refer to site plan for location in Appendix 2
- Communicate all information relating to the incident and the actions taken to the Emergency Services personnel on arrival
- Preserve the immediate area around the site of the incident until the relevant authority releases the site
- Keep records of the actions taken, the nature of the incident and any unusual circumstances

5.2 - COMMUNITY COMMUNICATION PROCEDURE

In the event of a pollution incident the following community communication procedures shall apply:-

- Alert community members in the vicinity of the pollution incident as detailed in our neighbour contact list and evacuate if necessary
- Follow instructions given by the Emergency Services to co-ordinate communications with the community members living or working in the vicinity of the incident as required
- If necessary, media alerts to keep community members informed of the relevant matters of the pollution incident including:-
 - Date, time and place of the incident
 - Nature of the incident
 - Extent of injury to persons and damage to property
 - Preliminary estimate of cost
 - Likely duration of incident
 - Cause of incident if known
 - Effect on operations
 - Steps taken to rectify and whether Emergency Services have been notified
 - Other parties involved
 - Likely inconvenience or danger to the public
 - Any threat to the environment

5.3 – EVACUATION PROCEDURE

In the event of a pollution incident which may require an evacuation, the following shall apply:

- DO NOT PANIC
- Follow instructions given by the Chief Warden for evacuation of premises
- Use safe evacuation routes and proceed in an orderly manner to the Bent Street assembly area
- Wait at assembly area until a head count is completed and further instructions given
- Do not re-enter the building until all clear is given and instructed to do so

5.4 - FIRE AND/OR EXPLOSION PROCEDURE

If any person observes a fire and/or explosion in the workplace they should:-

- Stay calm and DO NOT PANIC
- Move persons in immediate danger to safety
- Sound the fire alarm and advise the Chief Warden
- Ring the Fire Brigade and state exact location and details
- Shut down all operations, turn off power– refer Appendix 2 for location
- If safe to do so, try to extinguish the fire TRAINED PERSONS ONLY
- Evacuate all personnel to Bent Street assembly area

5.5 – SPILLS PROCEDURE

If any person observes a spillage in the workplace they should:-

- Alert other persons in the vicinity of the spill or leak
- Isolate source of the spill and if possible prevent further spillage
- Inform the Chief Warden
- Use the spill kit to absorb the spillage ensure protective equipment is worn
- Ensure spillage does not enter storm water drains
- Clean up area and dispose of material correctly
- Ensure the area is clean before recommencing operations
- If the spill is large or extremely hazardous, contact Emergency Services

5.6 – DUST EMISSIONS PROCEDURE

If any person observes excessive dust emissions they should:-

- Alert other persons in the vicinity of the fallout
- Shut down all operations to prevent further dust emissions
- Inform the Chief Warden
- Turn on the misting sprinkler system to alleviate dust
- If required, close roller doors to further reduce potential dust impacts
- If necessary, evacuate all personnel to Bent Street assembly area
- Do not re-enter the building until all clear is given and instructed to do so
- Sweep and clean all floor areas ensure protective equipment is worn
- Ensure the area is clear before recommencing operations

5.7 - UNACCEPTABLE WASTE PROCEDURE

In the event that unacceptable waste containing materials (such as asbestos containing materials) are detected by any person they should:-

- Inform the Chief Warden immediately
- Full PPE to be worn by all employees handling the waste
- Transfer solid waste to a designated area for safe temporary storage until appropriate disposal is feasible
- Dampening of suspected materials (in the case of asbestos) and secure packaging for transport off site
- Transfer liquid waste to designated storage collection container (portable bund) for transport off site
- Transport in an appropriate vehicle (by an appropriately licensed contractor) to a landfill site that can lawfully receive the waste

5.8 – MEDICAL EMERGENCY PROCEDURE

If you are the first person on the scene of a medical emergency you should:-

- Move people in danger to safety
- Inform the Chief Warden
- Ring the Ambulance Service and state exact location and nature of the injury or illness
- If necessary, and if you are trained, apply basic first aid
- Stay with the patient until medical assistance arrives

5.9 – GAS LEAK PROCEDURE

If you detect any leaks at the connection point at the front of the premises please follow the following procedure:-

- Isolate the Valve and erect exclusion zone
- Inform the Chief Warden
- Ring the Gas Emergency contact and state exact location and nature of the Gas leak.
- Evacuate the immediate and surrounding area.

6.0 – PREVENTATIVE ACTION

To minimise or prevent any risk of harm to human health or the environment arising from activities at our facility, the following preventative control measures shall be implemented for potential hazards identified including:-

6.1 – POLLUTION MINIMISATION PROCEDURES

- All sorting and recycling activities are conducted within the building which is sealed and drains to a central spill control drain
- All laden loads are covered and stored inside the building
- Misting sprinkler system is installed inside the building and roller door surrounds to alleviate dust emissions
- Factory floors are regularly swept to reduce the accumulation of dust and debris material
- Unsealed areas are regularly wet down to reduce potential dust pollution
- Ensure emergency resources are easily accessible
- Full PPE to be worn by all employees

6.2 - FACILITY & EQUIPMENT MAINTENANCE

- Fire fighting equipment is regularly maintained and inspected every six months by the fire protection specialists
- Misting sprinkler system is regularly serviced and inspected to ensure operating correctly
- Regularly check spill kit stations to ensure that they contain appropriate equipment
- Electrical tagging of equipment used on site
- Ensure any debris and/or spillages do not enter storm water drains

7.0 - SITE EMERGENCY RESOURCES

7.1 - FIRE FIGHTING EQUIPMENT

The fire fighting equipment stored on site includes the following:-

- **Portable Fire Extinguishers** Refer to site map attached as Appendix 3 for the location of portable fire extinguishers. Usage guides are located with all extinguishers detailing the type of fire extinguisher to be used for different classes of fires. Dry chemical, foam and carbon dioxide extinguishers are stored on site.
- Fire Hose Reels Refer to site map attached as Appendix 3 for the location of fire hose reels.
- **Fire Hydrant** Refer to site map attached as Appendix 3 for the location of the fire hydrant.

7.2 - SPILL STATION KITS

Several mobile spill station kits are located throughout the factory for emergency containment of any spills or leaks. Refer to site map attached as Appendix 3 for the location of spill station kits.

7.3 - FIRST AID EQUIPMENT

The First Aid Cabinet is located in the staff room of the office amenities. It is equipped with First Aid Kit B contents in accordance with current regulations.

A portable First Aid Kit is also kept in the cabinet if required.

7.4 - SPECIALIST EQUIPMENT

The following fully serviced equipment is kept on site:-

- Sweeper
- Forklift
- Loaders
- Excavator

8.0 - ADMINISTRATION OF THE PLAN

8.1 – POLLUTION INCIDENT RESPONSE TRAINING

All employees shall be trained annually in pollution incident response procedures to ensure that a high level of emergency preparedness is maintained. New employees shall undertake pollution incident response procedures training as part of their induction.

Training for pollution incident response procedures shall include:-

- Means of alerting others in the case of a pollution incident
- Procedures to be followed in each type of pollution incident
- Systems to account for all staff and visitors on site during an incident
- Safe evacuation routes to designated emergency assembly areas
- Preventative action including use of emergency resources and waste identification
- Plans of the premises showing the location of all emergency provisions
- Incident reporting

8.2 - INCIDENT REPORTING & DEBRIEFING

A written incident report must be prepared for pollution incidents. The report shall include:-

- Date, time and place of the pollution incident
- Nature of the incident
- Pollution incident response procedures followed during the emergency including the notification of Emergency Services
- Assessment of the performance of the Pollution Incident Response Management Plan for the pollution incident that occurred
- Recommendations for the review of the Pollution Incident Response Management Plan if required

In debriefing the relevant authorities and media on pollution incidents records of the following information provided should be kept:-

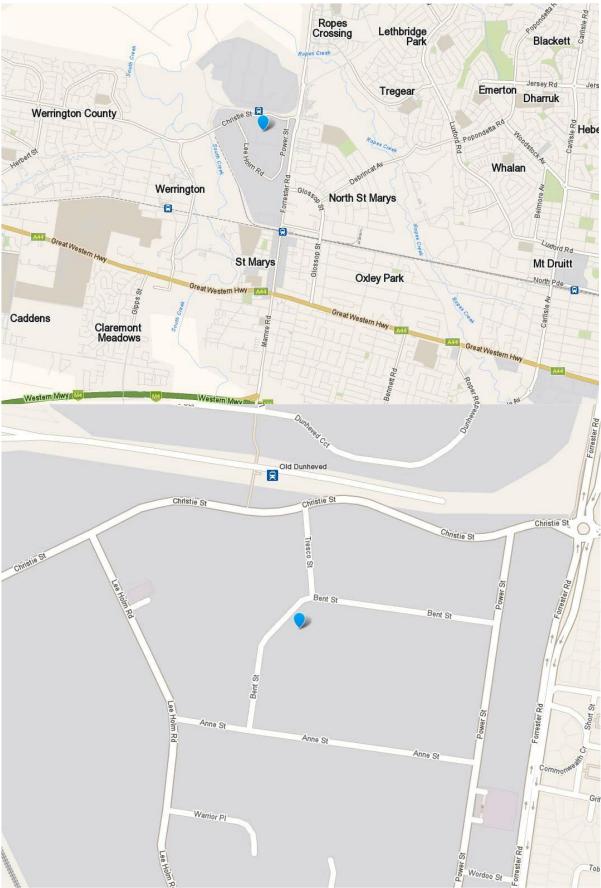
- Date, time and place of the incident
- Nature of the incident
- Extent of injury to persons and damage to property
- Preliminary estimate of cost
- Likely duration of incident
- Cause of incident if known
- Effect on operations
- Steps taken to rectify and whether Emergency Services have been notified
- Other parties involved
- Likely inconvenience or danger to the public

• Any threat to the environment

8.3 - REVIEW OF PLAN

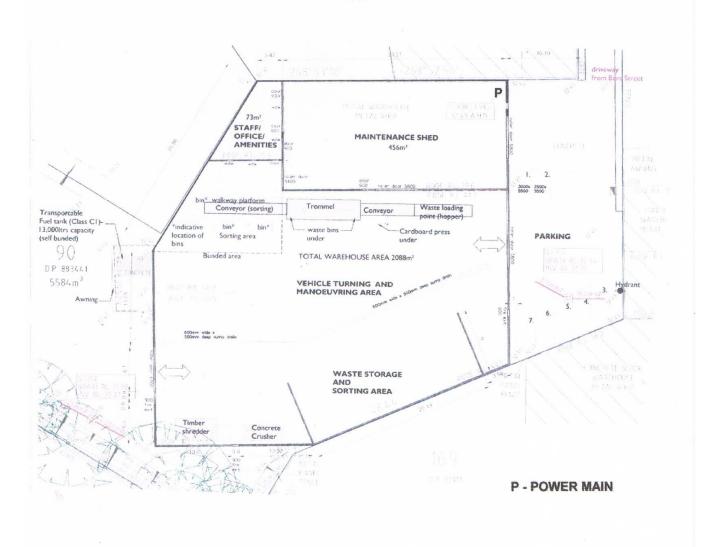
The Pollution Incident Response Management Plan shall be reviewed annually or within one month of any pollution incident occurring or otherwise when a significant change occurs such as the layout of the premises, new work processes or dangerous goods used etc to ensure that it remains current and effective.

APPENDIX 1: LOCALITY MAP



APPENDIX 2:

PLAN OF PREMISES



APPENDIX 3:

EMERGENCY RESOURCES SITE MAP

