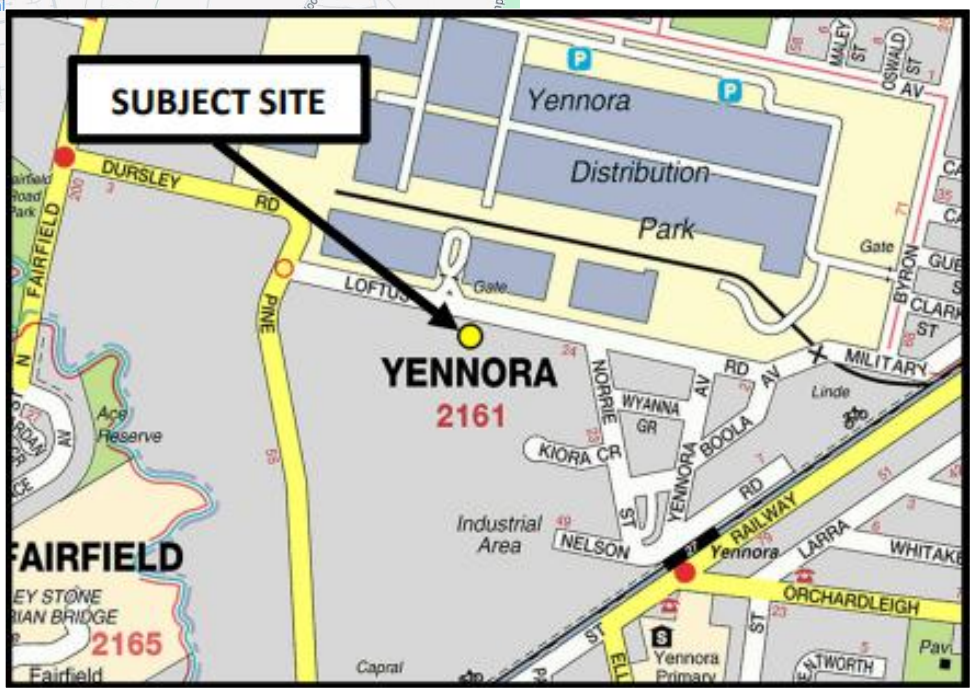
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LOCALITY MAP



Document History

Date	Revision	Changes	Approved
01.11.2024	Ver 01	Implementation	Adam Ykmour
01.05.2025	Ver 02	Modified	Simon Saba
13.08.2025	Ver 03	Modified	Simon Saba

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1. PURPOSE & OBJECTIVES

The purpose of the PIRMP is to ensure compliance with the requirements of the Protection of the Environment Legislation and to ensure efficient & effective response to pollution incidents.
This Pollution Incident Response Management Plan (PIRMP) has been developed to:

a) Ensure the prompt communication of a pollution incident firstly to site management and site emergency response personnel.

b) If required, we will notify without delay of emergency response organizations such as Fire and Rescue NSW and Local Council.

c) Ensure the response plan is maintained, tested and communicated.

2. FACILITY DESCRIPTION

Cobra Waste Solutions Pty Ltd operates a waste transfer facility at 30 Loftus Road, Yennora NSW 2161 situated on the southern side of Loftus Road between the junctions of Loftus Road / Norrie Street and Loftus Road / Pine Road. –
Refer Appendix 1.

Cobra Waste Solutions Pty Ltd is a licensed waste resource recovery and waste storage facility with the Environmental Protection Authority (EPA) Licence No: 21878.

The site contains an existing office (419m2), warehouse (4,142m2) and concrete hard stand areas. The total site has an area of 12,112m2.
Cobra Waste Solutions Pty Ltd operates as a Waste Recycling Facility. The annual operating capacity is 150,000 tonnes.

3. DEFINITION OF POLLUTION INCIDENTS

A pollution incident is an incident where 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 or is likely to occur. Typical pollution incidents include dust emissions, spills and/or leaks and fire and/or explosions.

4. CONTACT DETAILS

4.1- POLLUTION INCIDENT TEAM

TITLE	NAME	TELEPHONE
Manager	Mohammad Jomaa	1300 484 448
Chief Warden	Mohammad Jomaa	1300 484 448
Deputy Chief Warden	Adam Ykmour	1300 484 448
Communications Officers	Habiba Ykmour	1300 448

4.2- EMERGENCY SERVICE CONTACTS

SERVICE	TELEPHONE
Fire Brigade	1300 729 579
Police	000
Ambulance	000
EPA	131 555
Workcover	131 050
South Western Sydney Local Health District - Fairfield Hospital	02 9616 8111
Cumberland City Council	02 8757 9000
Water	132 090
Electricity	131 003

4.3- NEIGHBOUR CONTACTS

BUSINESS	ADDRESS	TELEPHONE
Porter Equipment	B30 Loftus Rd, Yennora	13 42 32
Cargo Logistics	1 Loftus Rd, Yennora	1300 222 746
Trak Logistics	Gate 1, B2,57 Loftus Rd, Yennora	1300 382 477
TFM Express	2/57 Loftus Rd, Yennora	1300 113 822
My Muscle Chef	1 Norrie St, Yennora	1300 364 993

4.4- DISTRIBUTION LIST

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

5. AIMS AND OBJECTIVES OF THE PLAN

5.1 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.

5.2 OBJECTIVES

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

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

6. POTENTIAL HAZARDS & LIKELIHOOD OF OCCURENCE

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 is minimized 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.

7. POLLUTION INCIDENTS AND RESPONSES

7.1- POLLUTION INCIDENT RESPONSE PROCEDURE

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

a. 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
b. Respond to and co-ordinate the incident
c. Notify management and the relevant Emergency Service(s) of the type and location of the incident
d. Decide if an evacuation is appropriate and notify staff and visitors
e. Turn off the power as soon as possible – refer to site plan for location in Appendix 2
f. Communicate all information relating to the incident and the actions taken to the Emergency Services personnel on arrival
g. Preserve the immediate area around the site of the incident until the relevant authority releases the site
h. Keep records of the actions taken, the nature of the incident and any unusual circumstances

7.2- COMMUNITY COMMUNICATION PROCEDURE

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

a. **Alert community** members in the vicinity of the pollution incident as detailed in our neighbour contact list and evacuate if necessary

b. **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

c. **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
- ✓ Extend of injury to people 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

d. **Notified**

- ✓ Other parties involved
- ✓ Likely inconvenience or danger to the public
- ✓ Any threat to the environment

7.3- 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 Loftus Road 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

7.4- 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 people 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 Loftus Road assembly area

7.5- SPILLS PROCEDURE

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

- ✓ Alert other people 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

7.6- 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 Loftus Road 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

7.7- 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

7.8- 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

7.9- 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.

8. – PREVENTATIVE ACTION

To minimize 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: -

8.1- 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

8.2- FACILITY & EQUIPMENT MAINTENANCE

- ✓ Firefighting 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

9. SITE EMERGENCY RESOURCES

9.1- FIRE-FIGHTING EQUIPMENT

The firefighting 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.

9.2- 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.

9.3- FIRST AID EQUIPMENT

The First Aid Cabinet is located on the ground level of the building. 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.

9.4- SPECIALIST EQUIPMENT

The following fully serviced equipment is kept on site: -

- ✓ Sweeper
- ✓ Forklift
- ✓ Loaders
- ✓ Excavator

10. ADMINISTRATION OF THE PLAN

10.1- 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 in 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 problem
- ✓ 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 for the premises showing the location of all emergency provisions
- ✓ Incident reporting

10.2- 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 briefing 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
- ✓ Extend of injury to people and damage to property
- ✓ Preliminary estimate of cost
- ✓ Likely duration of incident
- ✓ Cause of incident if known
- ✓ Effect on operations
- ✓ Steps taken to rectify whether Emergency Services have been notified
- ✓ Other parties involved
- ✓ Likely inconvenience or danger to the public
- ✓ Any threat to the environment

11. REVIEW OF PLAN-
REFER TO PIRMP_COMPLIANCE TESTING AND REVIEW

The Pollution Incident Response Management Plan shall be reviewed:

a. annually or
b. within one month of any pollution incident occurring or
c. 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.

The PIRMP will be tested either through:.

a. a desktop analysis or
b. an environmental emergency drill; and
c. Records of all training will be kept on file in the main office

12. PENALTIES FOR NON-COMPLIANCE WITH PIRMP REQUIREMENTS

There are offences set out in the POEO Act in relation to PIRMP requirements.

These relate to the failure to:

- ✓ prepare a PIRMP that complies with Part 5.7A of the POEO Act
- ✓ ensure the PIRMP is kept at the premises.
- ✓ test the PIRMP in accordance with the regulations.

i. The maximum penalties for the above offences are:

- ✓ for corporations $1,000,000 and,
- ✓ for continuing offences, a further penalty of $120,000 per day the offence continues.
- ✓ for individuals $250,000 and for continuing offences, a further penalty of $60,000 per day the offence continues.

ii. If a person carrying out an activity does not implement the relevant PIRMP if a pollution incident occurs in the course of an activity,

- ✓ for corporations $2,000,000
- ✓ for individuals $500,000

13. OVERVIEW OF HAZARDOUS CHEMICALS AT THE FACILITY

Consent SSD-9320662- DG clause B52 & B53-
Operational Environmental Management Plan- section 2.3
Procedure EMS-POL005-Ver01- Hazardous Chemical Stored Onsite

A. **Limited hazardous chemicals** will be used for vehicle and machinery maintenance.
B. Includes:
   - 13,000 L **self-bunded diesel tank**
   - **Maintenance oils and grease**
   - **Welding gases** (acetylene and oxygen)

Product Name	Un No.	ADG/GHS	GHS Signal Word	Quantity Storage Capacity	Storage Type	Storage Location
Diesel	1202	ADG: *Non-dangerous good (Combustible Liquid C1)* GHS: • Aspiration Hazard: Category 1; • Carcinogenicity : Category 2; • Flammable Liquid: Category 4; • Hazardous to the Aquatic Environment – long-term hazard: Category 2	DANGER	13,000 L	Self-bounded Storage Tank	Rear External Area
Degreaser	1760 – water- based degreaser; and 3082 – solvent-based degreaser	• Eye damage/irritation: Category 2A • Skin corrosion/irritation: Category 2	WARNING	50 L	Containers	Workshop
Grease	N/A	N/A		50 L	Containers	Workshop
Gearbox Oil	3082	N/A	N/A	20 L	Containers	Workshop
Acetylene Gas	1001	ADG: *Class 2.1 Flammable Gas* Extremely flammable gas.		6 Cylinders (50 kg)	Cylinders	Locked in cage in external area

Oxygen Gas	1072	ADG: *Class 2.2 (5.1)* – Non-flammable, n o n -toxic gas, oxidizing agent		6 Cylinders (76 kg)	Cylinders	adjacent to workshop.
Domestic Cleaning Products	Various	various	Various	Minor quantities (approx. 20 L)	Spray Bottles	Office

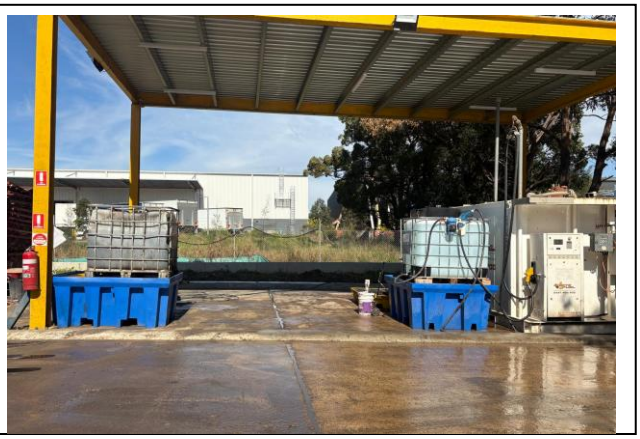
C. Labelling

i. Must follow **Safe Work Australia's Labelling Code of Practice (2018)**
ii. Labels must be:
- **Visible and legible**
- **Lettering ≥100 mm** high, black on white/silver background

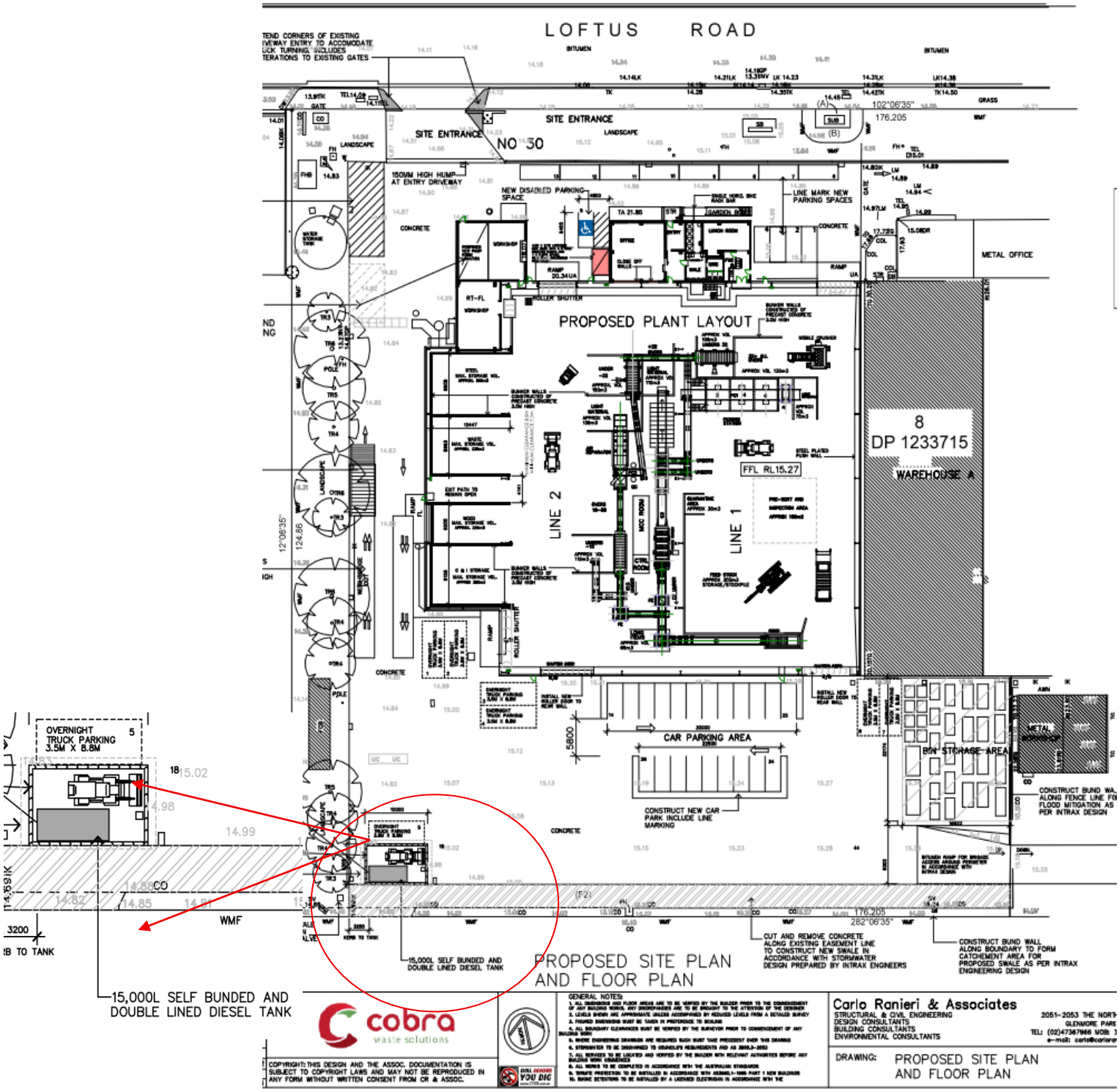
D. Inspection and Records

i. **Weekly inspections** must document non-conformances
ii. **EMS-POL005-Ver01- Hazardous Chemical Stored Onsite-----page # 3**
iii. Record corrective/preventive actions
iv. Maintain inspection records as part of the OEMP

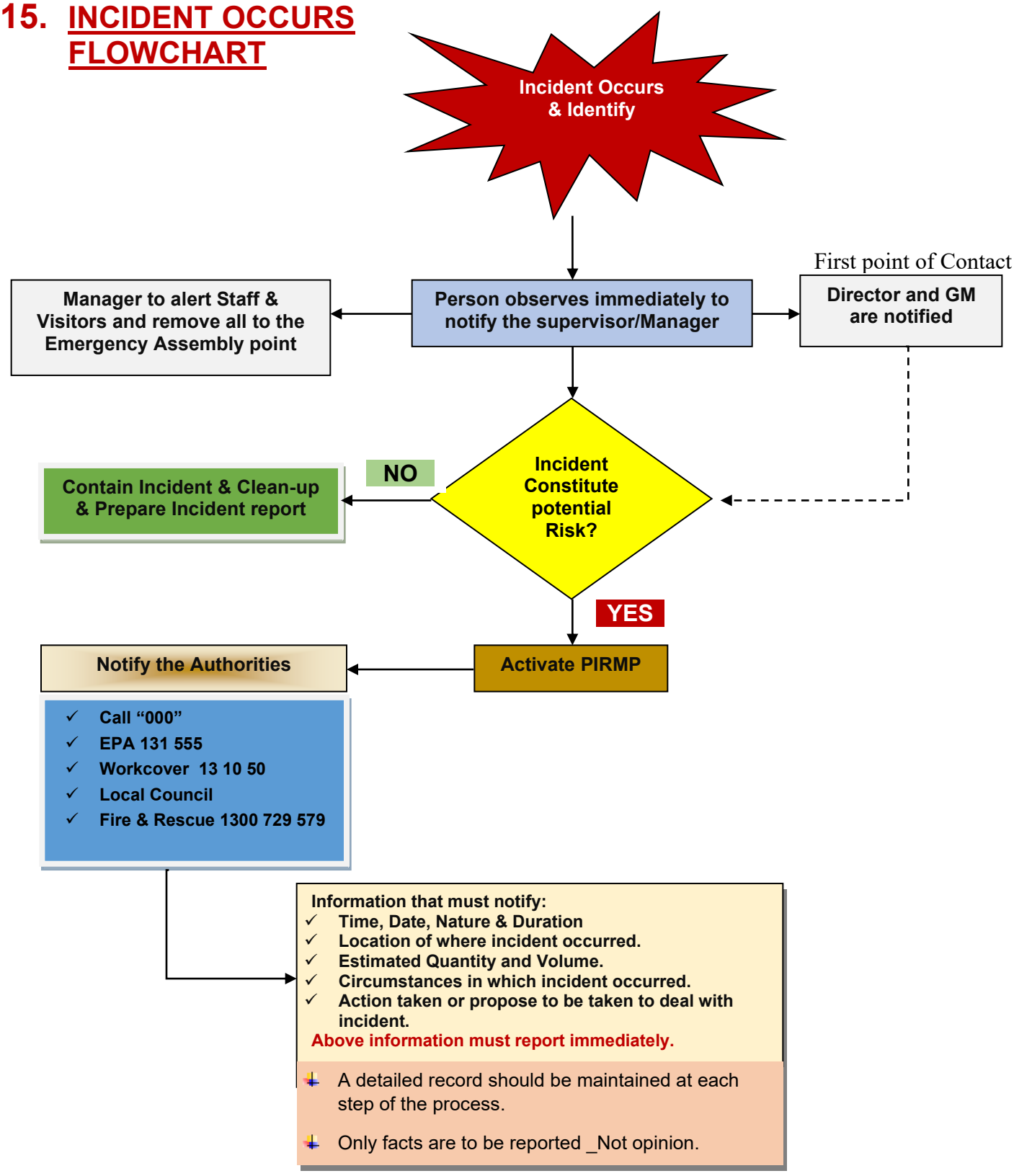
Photos- Self Bunded Diesel Tank



14. SITE FLOOR PLANT LAYOUT

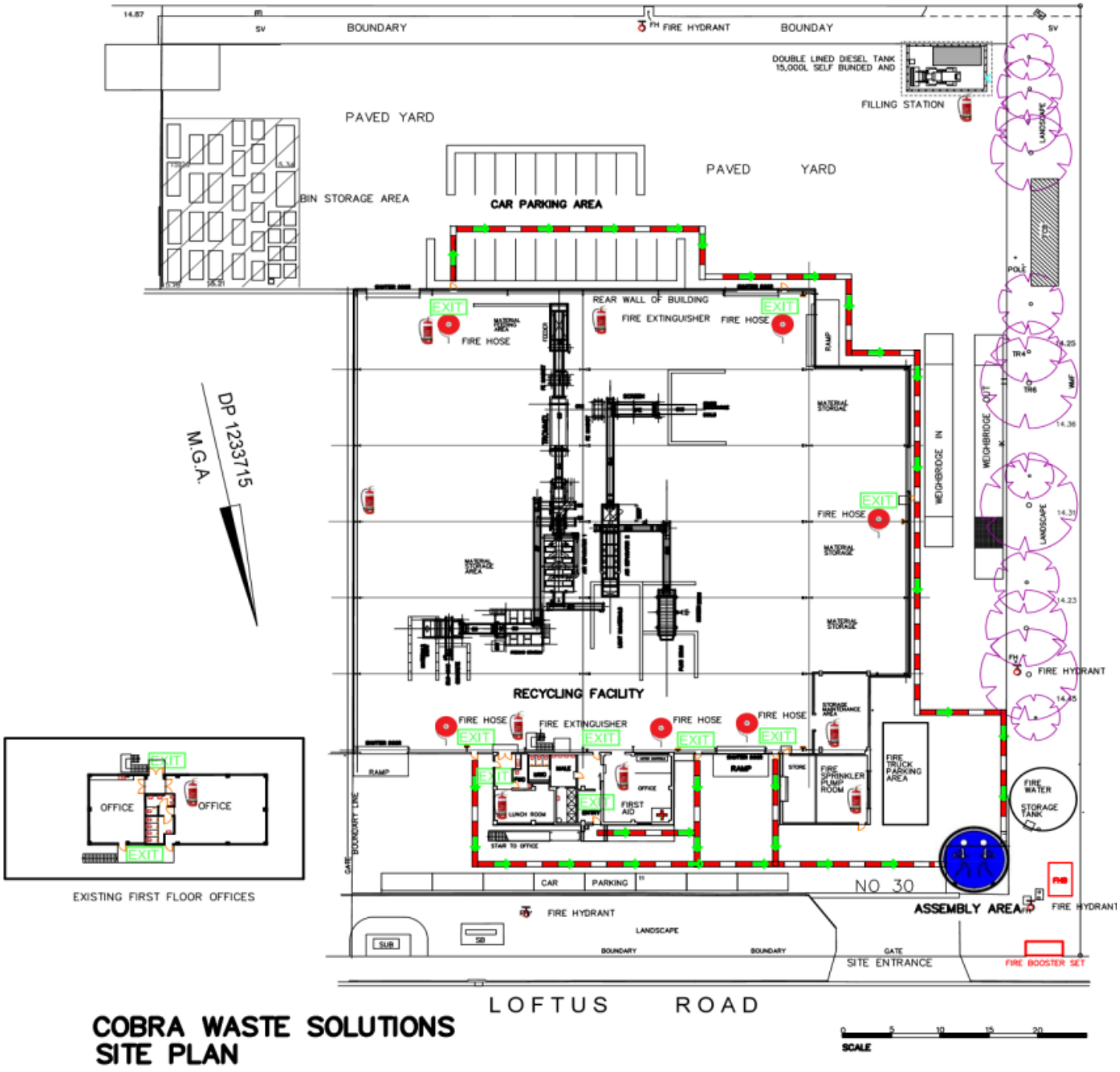


15. INCIDENT OCCURS FLOWCHART



16. EMERGENCY RESOURCES SITE MAP

Figure 1: CWS Site at Loftus Road Yennora



17. PIRMP_COMPLIANCE TESTING AND REVIEW

Testing must cover all components of the PIRMP, including the effectiveness of training.

Date: ___/____/____ Tested By:_____, Position: _____

Testing Method Used: Desktop Exercise! ☐ Practical Exercise ☐ Drill ☐

1	What is the PIRMP	Defined **P**ollution-**I**ncident-**R**esponse-**M**anagement-**P**lan	☑
2	Availability of the PIRMP	A copy of the full PIRMP is maintained at the premises to which the licence relates, and also on the Website, The PIRMP written in English and PDF format. Available, if authorities have requested a copy.	☑
3	Implementation of the PIRMP	• If a pollution incident occurs at the premises so material harm to the environment.	☑
4	Testing the PIRMP	PIRMPs must be tested at least once every 12 months.	☑
5	Facility and Process Detail	List of the waste type, and the link to the EPA website. • **List is displayed in the office**	☑
6	Description and likelihood of hazards	Description of potential hazards and likelihood-Is there any hazards at the premises may cause harm. • **There are no potential hazards at the premises may cause harm**	☑
7	Pre-emptive actions	a) Are the pre-emptive actions being recognised. • b) Is there any Risk Assessment prepared? c) Spill Procedure and spill kits available.	☑
8	Inventory of pollutants	Inventory of potential pollutants stored on the premises the maximum quantity of any potential pollutant.	☑
9	Identify potential hazards		☑
10	Minimizing harm to people on the premises.	Risk assessment- and, emergency team, training	☑
11	Spill response procedure	Is the procedure available? • Have all relevant staff been trained. Incident Response Team / plan.	☑
12	Safety Equipment	Safety equipment are listed, provided and PPE made available to all employees. •	☑

13	Contact details	names, position titles names, position titles •	☑
14	Communicating with neighbours and the community	details of the approaches and systems to be used to provide early warnings and regular updates to the neighbours. •	☑
15	Response and legal duties	Have the employees and contractors been trained to what immediate action required when become aware of any potential incident. Duty to notify	☑
16	Pollution incident drill	Has the company performed a pollution incident drill, Are employees being involved and engaged Drill last conducted: _----------Report: #_____	
17	Staff Training	Emergency Pollution incident- Pollution Drill-Emergency Response. •	☑
18	Map	Details maps showing locations, surrounding neighbours and Location of the safety equipment. •	☑
19	**Additional Comment**		
20	**Reporting On Compliance**		
	FINDINGS **1._** **ACTION(S)** **1._**		

Testing Completed By:_____
Position:_____
Date:_____
Signature:_____

Reviewed By:_____
Position:_____
Date:_____
Signature:_____