2024

Pollution Incident Response Management Plan

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Astron Sustainability, Seven Hills

1/8/2024

Pollution Incident Response Management Plan

1. Scope and Objective

This **Pollution Incident Response Management Plan ('PIRMP')** has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997* ('the Act') and associated *Protection of the Environment Legislation* ('POEO').

This document applies to **Astron Sustainability** (formerly known as VIP Drum Reconditioners (NSW) Pty Ltd), **Seven Hills ('Seven Hills')**, and references existing emergency response plans and associated procedures. It also details additional supplementary site-specific information as required under the POEO legislation and in respect to **Environment Protection Licence ('EPL')** requirements.

2. Referenced Documentation

Astron Sustainability operates as a division of Pact Group and specializes in recycling/ reuse of packaging. As a division of Pact Group, Astron Sustainability operates within the parent company's safety and environmental framework and management system. This PIRMP is consistent with the Pact Incident reporting and investigation procedure, it supports the site-specific emergency preparedness plan, and any safe operating procedures ('SOP') mentioned. Where terms or conditions are found to be inconsistent, this PIRMP shall be viewed as subordinate to the comparison document.

Specific legislative requirements for the development and implementation of this PIRMP are provided in the following table.

- Part 5.7A of the *Protection of the Environment Operations Act 1997*;
- Part 5.7A of the *Protection of the Environment Legislation Amendment Act 2011*;
- *The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*; and
- Environment Protection License 124.

Internal documentation referred to in this plan include:

- Incident reporting and investigation procedure, *PACT WHSE PRO 006-02*;
- Emergency preparedness plan (site specific);
- Risk assessment of environmental aspects and impacts register;
- SOP063 Stormwater management; and
- SOP058 Spill response.

3. Definitions

3.1 What is a Pollution Incident?

A Pollution incident (or event) is defined by the Act as –

- an incident, or
- a set of circumstances during, or
- a consequence of which there is or is likely to be

a leak, spill or other escape or deposit of a substance. Because of which pollution either –

- has occurred,
- is occurring, or
- is likely to occur.

Note that it does not include an incident or set of circumstances involving ONLY the emission of any noise.

3.2 Abbreviations

ADM	ADM is the name of a building located at the north-eastern corner of the premises where IBCs are washed and stored.
Bung type	Bung type describes the process involving drums that have not been opened.
Closed head	Closed head or bung type drums can have their tops cut-off. This usually happens because any residue cannot be effectively washed and often requires treatment via furnace thermal processing.
DG	Dangerous goods, as per the relevant Act.
Drums	Are cylindrical containers of metal or plastic construction with a volume of approximately 205 litres.
IBC	Are cubed containers of plastic construction, held by metal frames on a pallet sized-base with a volume of approximately 1,000 litres.
EPA	Environment Protection Authority.
EPL	Environment Protection License.
PIRMP	Pollution Incident Response Management Plan.
POEO Act	*Protection of the Environment Operations Act 1997.*
POELA Act	*Protection of the Environment Legislation Amendment Act 2011.*
Run-off	The term 'run-off' in this document refers to liquids flowing from a surface positioned at a higher level to another surface positioned on a lower level.
WWTP	Waste Water Treatment Plant is used to treat any wash water from the Drum or IBC cleaning process.

4. The Plan

4.1 Description of Site and Facilities

VIP specializes in reconditioning of plastic and steel drums (205 litre capacity) and Intermediate Bulk Containers, IBCs (1,000 litre capacity) – please reference the Site Map on the next page.

Drum reconditioning operates along the western side of the site and IBC reconditioning operates along the eastern side. All reconditioning operations areas are sealed by concrete surfaces and have secondary containment systems.

The open head drum reconditioning process uses a furnace to thermally process inside of drums once its lid has been cut off. The furnace is fuelled by natural gas piped from the southern side of the site. The gas isolation valve can be accessed by using a key from the office building. There is a natural gas fuelled boiler within the general area of the furnace.

Closed head drums are conveyed along the reconditioning line. It is externally washed using a hot caustic bath. Drums are then internally washed through a main wash plant where spigots are inserted into each bung. At the entry of the plant, jets of high pressure, hot-caustic water is applied through each spigot into the internal drum. As the drum moves closer to the plant's exit jets of high pressure warm water is applied through the spigots to the internal drum. The drum leaving the plant is then cooled, buffed, repainted, then quality checked/ tested.

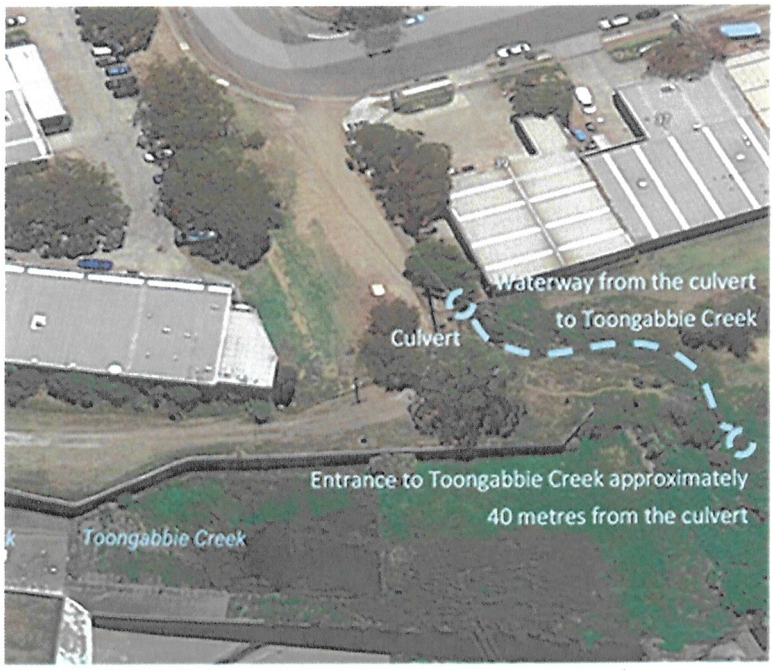
There are two spray booths onsite (one for open head and another for bung type) with Class 3.1 DG stores located nearby. Paints are mixed and pumped to both spray booths from the nearby DG stores. There is a natural gas fuelled heater following the bung type spray booth.

At the rear of the site, in the north eastern corner there is a standalone building called the ADM which is built mainly of concrete blocks from the walls adjacent to the site boundaries. This building contains an IBC wash plant, and stores Class 3.1 DGs.

The premises drain inwards by the slope of the floor. A transfer pit collects waste water accumulated from the drum reconditioning lines, which is directed to three inground containment tanks. Wastewater from the inground concrete tanks is pumped and treated in a Waste Water Treatment Plant which is bunded by a concrete wall. Both the inground concrete tanks and the WWTP are equipped with level sensors and text messaging capability to alert management and key staff before water levels reach a critical point.

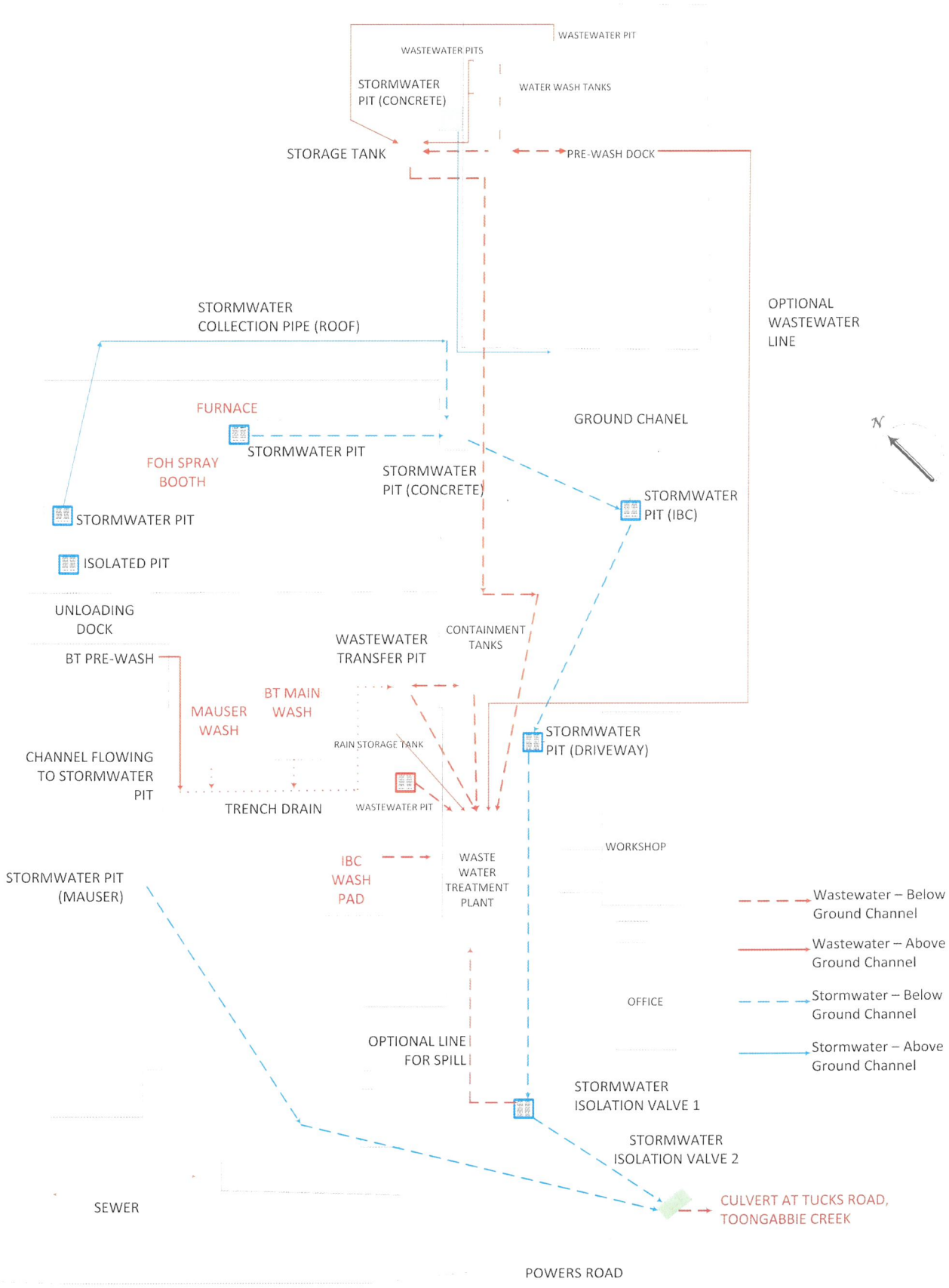
Run-off from within the ADM is captured and plumbed into external Waste Water Tanks, which flows to the WWTP.

The site has two stormwater shut-off valves located in two separate stormwater pits. The first stormwater pit is in the main driveway at the entrance to Powers Road, marked by blue paint around its perimeter. The second stormwater pit is located off the main driveway and is the site's primary way of ensuring that undesirable water does not leave the premises. The stormwater valve when shut accumulates water which can be pumped directly into an IBC for disposal, or back into the WWTP for further treatment.



The site's stormwater system exits at a culvert nearest to Tucks Road, to a waterway where it meets Toongabbie Creek.

4.2 Site map


WASTEWATER PIT
WASTEWATER PITS
STORMWATER PIT (CONCRETE)
WATER WASH TANKS
STORAGE TANK
PRE-WASH DOCK
STORMWATER COLLECTION PIPE (ROOF)
OPTIONAL WASTEWATER LINE
FURNACE
GROUND CHANEL
STORMWATER PIT
FOH SPRAY BOOTH
STORMWATER PIT (CONCRETE)
STORMWATER PIT (IBC)
STORMWATER PIT
ISOLATED PIT
UNLOADING DOCK
WASTEWATER TRANSFER PIT
CONTAINMENT TANKS
BT PRE-WASH
BT MAIN WASH
MAUSER WASH
RAIN STORAGE TANK
STORMWATER PIT (DRIVEWAY)
CHANNEL FLOWING TO STORMWATER PIT
TRENCH DRAIN
WASTEWATER PIT
WORKSHOP
IBC WASH PAD
WASTE WATER TREATMENT PLANT
STORMWATER PIT (MAUSER)
Wastewater – Below Ground Channel
Wastewater – Above Ground Channel
OFFICE
Stormwater – Below Ground Channel
Stormwater – Above Ground Channel
OPTIONAL LINE FOR SPILL
STORMWATER ISOLATION VALVE 1
STORMWATER ISOLATION VALVE 2
SEWER
CULVERT AT TUCKS ROAD, TOONGABBIE CREEK
POWERS ROAD

4.3 Description of Hazards

The site has undertaken a risk assessment of its environmental aspects and impacts and has determined the following as foreseeable pollution incidents:

- Undesirable water exiting site via stormwater drains,
- Uncontrolled air discharge from furnace, and
- Uncontrolled discharge of offensive odours from site's boundary.

4.4 Risk controls

The following controls have been implemented to control the above risks:

- The site has implemented a Pollution complaints and resolution process as a requirement of its EPL and to promptly identify and control a potential pollution event. The site's pollution complaints number is listed on its website - Sustainability - Pact Group and pollution complaints form is in the office and administered to by the site administration staff.

- Both IBCs and drums are collected from customer sites and accepted onsite with no more than trace-amount of chemical residue as part of the site's acceptance criteria. This minimises the amount of undesirable materials onsite and reduces the risk of a pollution incident occurring. Any detected amounts greater than trace is sent back to the customer or is measured and treated with costs charged back to the customer as a disincentive.

- Chemicals are handled and stored on concrete surfaces with a secondary containment system. Above ground the site contains various localised bunding or secondary containment areas where liquid can be trapped. Underground, the site contains a series of pipe work funnelling into two central pits with isolation valves in each pit. This containment system ensures that the site can contain and trap any undesirable water from leaving site.

- Spill kits are kept and made accessible near chemical handling areas and stores. They are externally maintained on a regular basis and additional spill absorbent is kept in the ADM for spares.

- Pits and tanks located across the site have automated pumps with multiple layers of controls including level sensors with SMS and/or alarm systems in it. This is to ensure adequate response before a pollution event occurs.

- Waste products are legally disposed of by accredited companies.

- The site engages an accredited third party to conduct emissions testing on a regular basis in respect to its licence condition. Results are monitored closely and outliers or breaches are notified to the respective authority as required, with corrective actions to be implemented.

4.5 Inventory of Potential Pollutants

An inventory of all chemicals handled and stored onsite is maintained on a site chemical register. A regular stocktake is taken to determine actual volumes stored onsite. The Appendix provides a detailed inventory of hazardous chemicals handled and stored onsite, including maximum quantities.

The site conducts a review of this register as required by the Pact Group procedure.

4.6 Notification Procedure and Contact Details

If a pollution incident occurs which causes or threatens material harm to the environment, the following parties must be notified so action can be coordinated to prevent or limit harm to the environment and human health:

- The Environmental Protection Authority on 131 555
- The Ministry of Health, Parramatta on 9840 3603 or 9845 555 (after hours)
- SafeWork NSW on 131 050
- Blacktown City Council on 9839 6000 or 1300 133 491
- Fire and Rescue NSW on 000

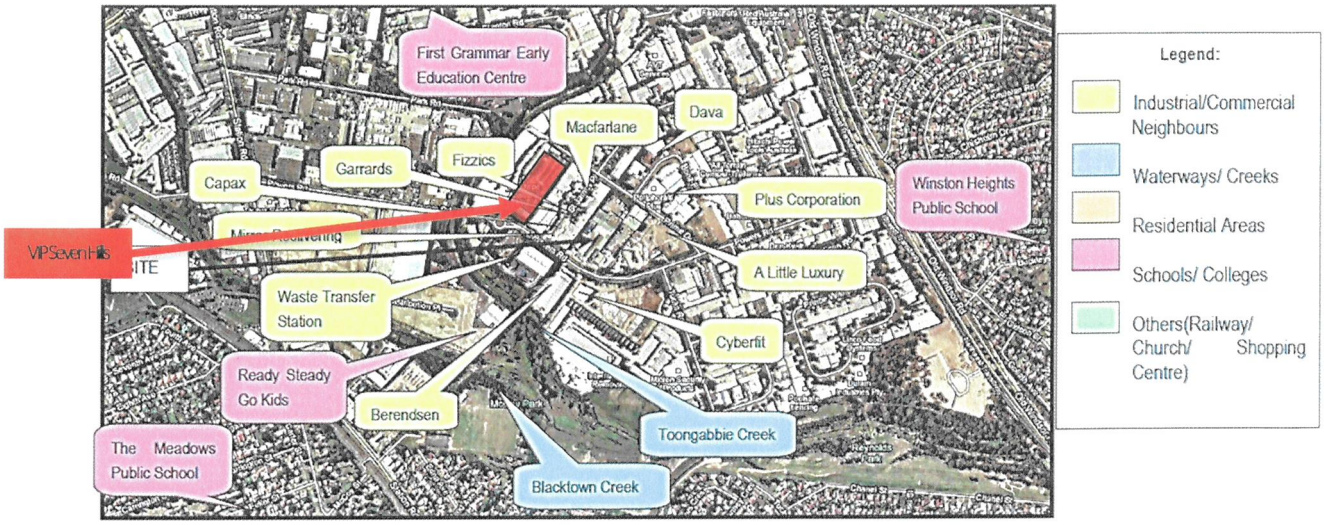
The following site Emergency Contacts must be immediately contacted in alignment with the relevant response/ notification and escalation procedure:

- Grant McNally, Plant Manager on 0427 512 954
- Shannon Bell, Production Manager on 0428 633 275
- John Jones, National WHSE Manager on 0439 386 249

4.7 Map of location

As part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, immediate neighbouring properties will be notified, under the direction of Emergency Services with immediate response information.

The map below and the table provided in subsection 4.8 provide information and details of the site' immediate neighbours.



4.8 Surrounding neighbours

Nearby businesses:	Address:	Contact Number:
Berendsen Fluid Power	31 Powers Road, Seven Hills	9838 5800
Cyberfit Gym Equipment	66/45 Powers Road, Seven Hills	9620 6635
Waste Transfer Station	27-29 Powers Road, Seven Hills	13 73 73
Mirror Resilvering Service	1/28A Powers Road, Seven Hills	9624 4343
Capax Australia	4/7 St James Place, Seven Hills	9674 8188
Fizzics Education	5 St James Place, Seven Hills	9674 2191
Macfarlane Generators	1 St James Place, Seven Hills	9899 6699
Gerrards	2/7 St James Place, Seven Hills	9674 2188
Versatile Technologies	1/6 St James Place, Seven Hills	8824 2400
Hallite Seals Australia	1/1 St James Place, Seven Hills	9620 7300
Metromix	34 Powers Road, Seven Hills	9838 8700
Nuts Galore	3 Prime Drive, Seven Hills	9624 3337
A Little Luxury	1/4 Prime Drive, Seven Hills	9620 6031
Daval International Wire	5 Bonz Place, Seven Hills	9624 1800
Plus Corporation	2 Bonz Place, Seven Hills	9620 4999
Aquabliss Seven Hills	20 Distribution Place, Seven Hills	9838 4422
Seven Hills High School	Johnson Ave, Seven Hills	9624 3329
The Meadows Public School	Fuller Street, Seven Hills	9631 3737
Seven Hills West Public School	2A Lucas Road, Seven Hills	9624 3348
Seven Hills North Public School	301 Seven Hills Road, Seven Hills	9624 1275
The Hills Sports High School	Best Road, Seven Hills	9622 7300
Ready Steady Go Kids	20 Distribution Place, Seven Hills	1300 766 892
First Grammar Early Education Centre	3/12 Abbott Road, Seven Hills	9624 5003
Bountiful Early Learning Centre	19 Fuller Street, Seven Hills	9896 2642
Winston Mall Children's Centre	190 Caroline Chisholm Drive, Winston Hills	9624 3421
Winston Heights Primary School After School Care	Langdon Road, Winston Hills	9838 8127
Toongabbie Children's Early Learning Centre	23 Barangaroo Road, Toongabbie	9631 8639
It's a Small World Childcare Centre	1 Williamson Ave, Seven Hills	9624 3424
PDK Dojo Martial Arts School	26/155 Prospect Highway, Seven Hills	0410 404 900

4.9 Responding to a Pollution Incident

At all times minimising harm to persons shall be a priority. Workers are to immediately refer to and implement:

- Incident reporting and investigation procedure, *PACT WHSE PRO 006-02* in response to an incident,
- *SOP058 Spill response* in response to a spill event, and
- The *Emergency preparedness plan* in response to a fire or smoke event.

For all other pollution incidents, workers must immediately notify the manager and take action to contain the risk and minimise any harm it could cause to the environment and to people.

4.10 Training and Testing of the Plan

This PIRMP shall be tested:

- Routinely at least once every 12-months, or
- Within 1-month following implementation of additional controls if an incident has occurred in relation to the EPA licence.

5. Revision history

PIRMP

Created by Nidin Pillai, WHSE Advisor.
Reviewed by: John Jones, National WHSE Manager, Arielle Comin, Reliability Engineering Manager.
Approved by: John Jones, National WHSE Manager, Grant McNally, Plant Manager.
Version Number: 6.0
Prepared on: 25/08/2016
Revised on: 01/08/2024
Total pages: 8

6. Endorsement

This PIRMP has been endorsed by the Seven Hills Plant Manager and the National WHSE Manager.

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12/09/2024

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12/09/2024