POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

BSV Tyre Recycling Australia Pty Ltd – Tyre Recycling Facility
30 Daisy Street, Revesby

17 November 2022

EXECUTIVE SUMMARY

This Pollution Incident Response Management Plan (PIRMP) has been developed for the BSV Tyre Recycling Australia Facility located at 30 Daisy Street, Revesby.

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 Chapter 4 of the *Protection of the Environment Operations (General) Regulation* 2022.

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. BSV Tyre Recycling Australia 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
Step 1	Contact Operations Manager		Section 7
Step 2	Is there an immediate threat to human health and the environment?	Call Emergency Services (000) or 112 for mobile phones	Section 8.1
Step 3	Does the site need to be evacuated?	Initiate evacuation procedure Safely follow pollution incident procedures	Figure 9.1
Step 4	Inform other relevant authorities of the incident	Follow the pollution incident plan contacting the relevant authorities	Section 8.1
Additional staff responsibilities			
Step 5	**Onsite Staff**	**Operations Manager**	**General Manager**
	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.

TABLE OF CONTENTS

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:

Ensure comprehensive and timely **communication** about a pollution incident to staff, EPA, authorities and other stakeholders

Minimise and control the risk of a pollution incident by identifying risks and planning actions to minimise and manage them

Ensure that the plan is properly **implemented** by nominated trained staff, and regularly **tested**

A "pollution incident" is defined as:

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 noise.

The PIRMP must be:

2. About the Site

Address	• 30 Daisy Street, Revesby, NSW
Lot number	• Lot 198, DP 7866
Site size	•Approximately 4,000m^2 lot size in total, approximately 1,230 m^2 of building floor area
LGA	•Canterbury-Bankstown Council
Zoning	• IN1 - General Industrial
Regulatory Controls	•The tyre recycling facility has been granted development consent by Canterbury-Bankstown Council, under development application number DA 843/2013 • 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 an any one time, an Environment Protection Licence is required under the *Protection of the Environment Operations Act* 1997. No works or activities are to be undertaken at the site prior to an Environment Protection Licence being approved for the Facility.
Waste types accepted	•Up to 14,600 tonnes per annum of passenger vehicle and truck tyres are permitted to be processed at the Facility.

2.1 Location and Site Description

The subject site is located at 30 Daisy Street, Revesby, in the Canterbury-Bankstown Council local government area. The site is also identified at Lot 198 DP 7866. The lot size is approximately 4,000m^2, including approximately 1,230m^2 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 Daisy Street, a collector road with a speed limit of 50km/hr, with two traffic lanes and kerbside parking on either side of the carriageway.

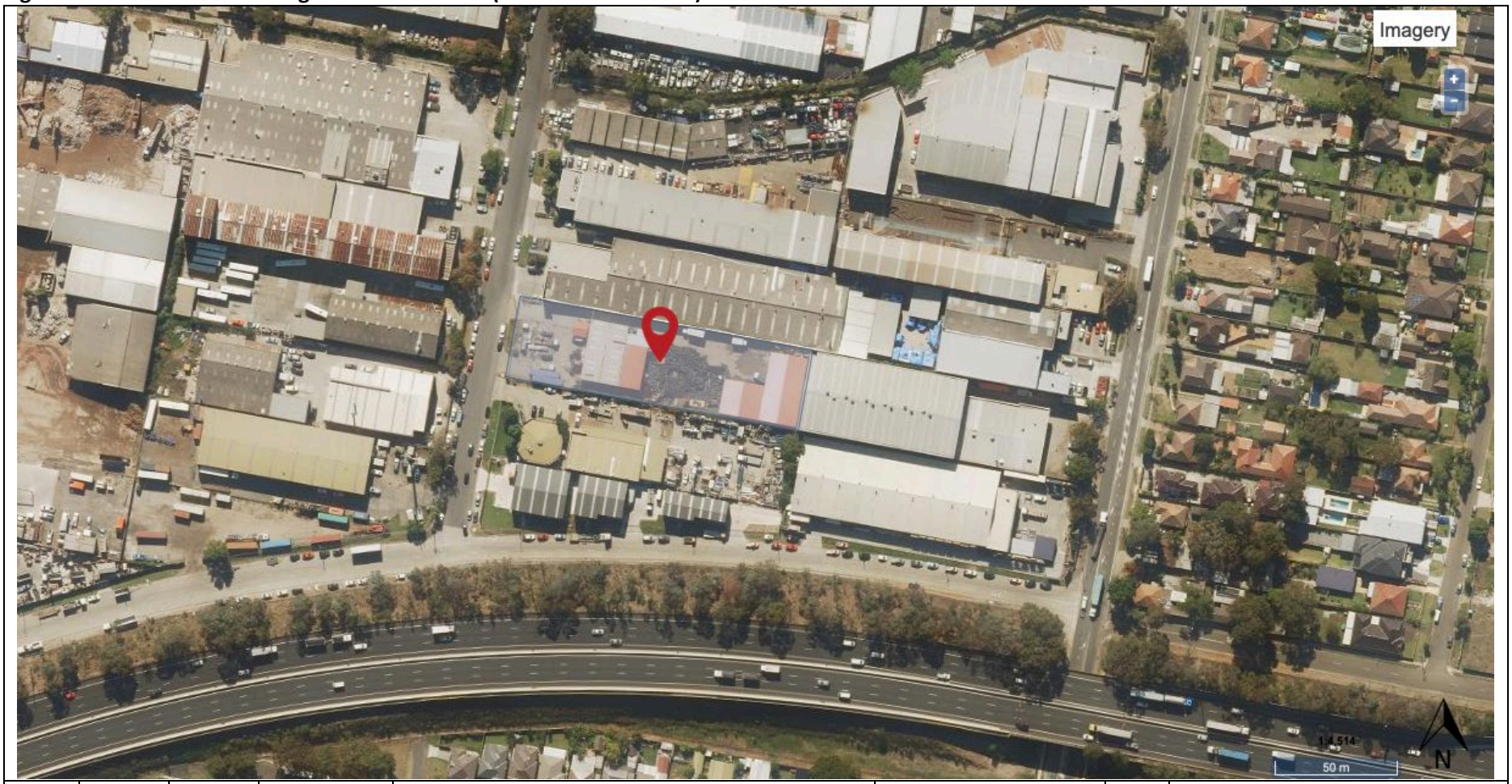
The site has a total of ten existing car parking spaces within the front setback area.

Such access and parking will comply with *Canterbury Development Control Plan* 2012 Section E1.5 - Parking and Access and AS 2890 – Parking Facilities.

The subject site is zoned IN1 General Industrial pursuant to Bankstown Local Environmental Plan 2015 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.

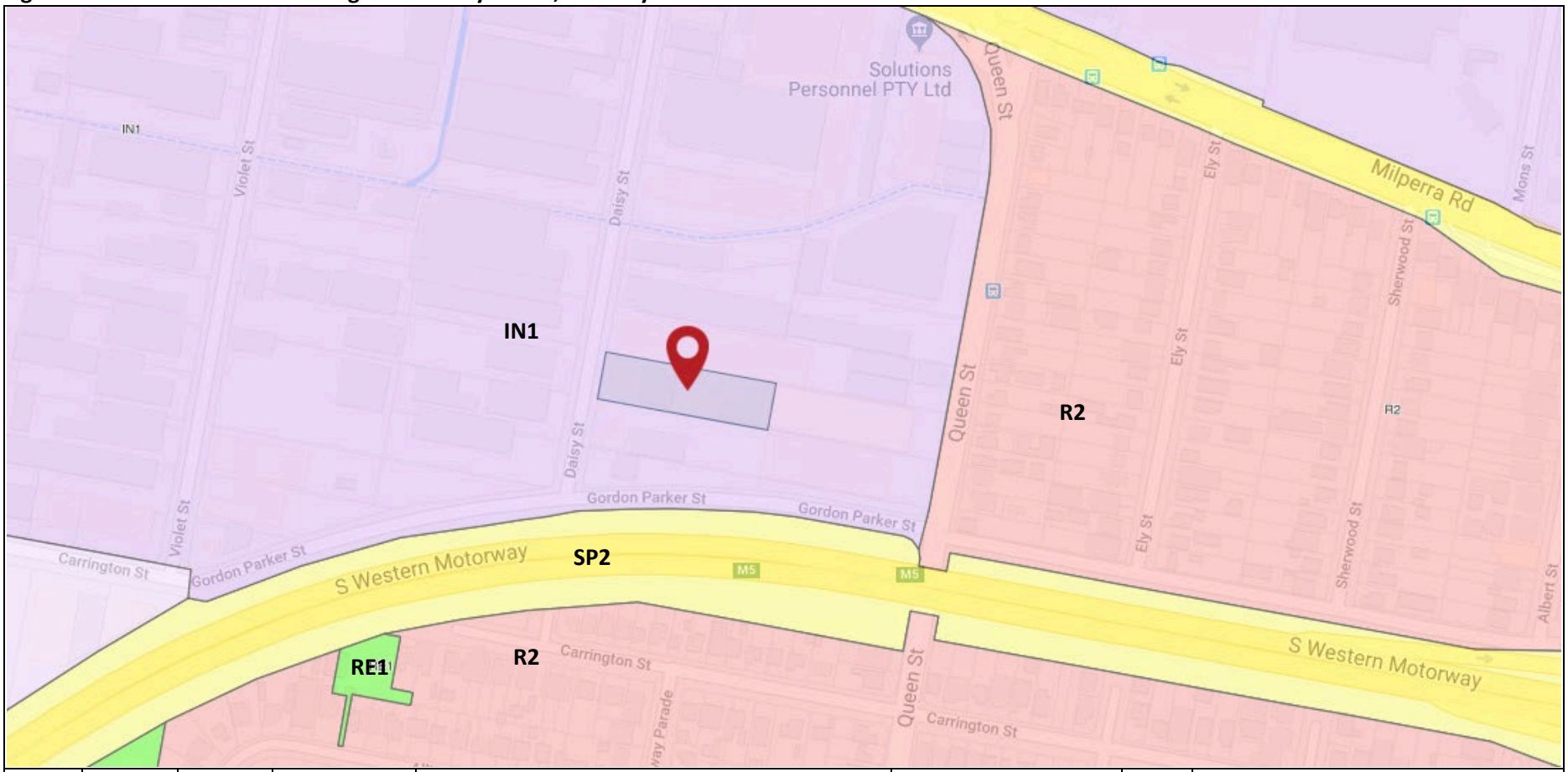
Figure 2.7 provides an overview of the waste receival and processing.

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



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd		Client	BSV Tyre Recycling Australia Pty Ltd
01/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	BSV Tyre Recycling Australia
						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 30 Daisy Street, Revesby.



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01/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	BSV Tyre Recycling Australia
						Title	Zoning for Lot 198 DP 7866
						Scale	Not to Scale
						Source	NSW Department of Planning and Environment

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 *Canterbury Local Environmental Plan* 2015, 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
37-55 Violet Street	Enviro Recycling	Recycling Centre
18 Daisy Street	M&I Spares	Used Auto Parts Store
22 Daisy Street	ISL Recyclers	Car Service
25 Daisy Street	Bent Glass	Glass and Mirror Shop
26 Daisy Street	Japan Ceramics	Wholesaler
29 Daisy Street	Transdev NSW	Transportation Service
32 Queen Street	ECCOSIT	Office Furniture Store
34 Daisy Street	InForme Signs	Sign writers
37 Daisy Street	Dellow Conversions	Auto Parts Store
38 Queen Street	The Fencing Warehouse	Metal Fabricator

2.3 Nearest Sensitive Receptors

2.3.1 Residential

The site is located in an industrial zoned area, with the nearest residential areas being located on the southern side of the South Western Motorway to the south and on Queen Street 140m to the west. The closest residences are along South Western Motorway approximately 136m to the South of the site.

Adjoining premises are shown in Figure 2.7. Under the *Bankstown Local Environmental Plan* 2015, a wide range of land uses are permitted in this area, with consent.

2.3.2 Waterway

The nearest waterway is Salt Pan Creek, located approximately 2.8km to the east of the subject site which flows into the Georges River. 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.

Stormwater runoff from the parking area at the front of the site drains to a pit with an Enviropod for pollutant removal, which transfers stormwater for discharge to Daisy St. Roofwater and runoff from the hardstand at the rear of the site drains towards a drainage pit on the front boundary of the property, which is connected to an Enviropod then the council drainage system. A manually operated stormwater isolation valve is installed in the grated pit at the front of the site.

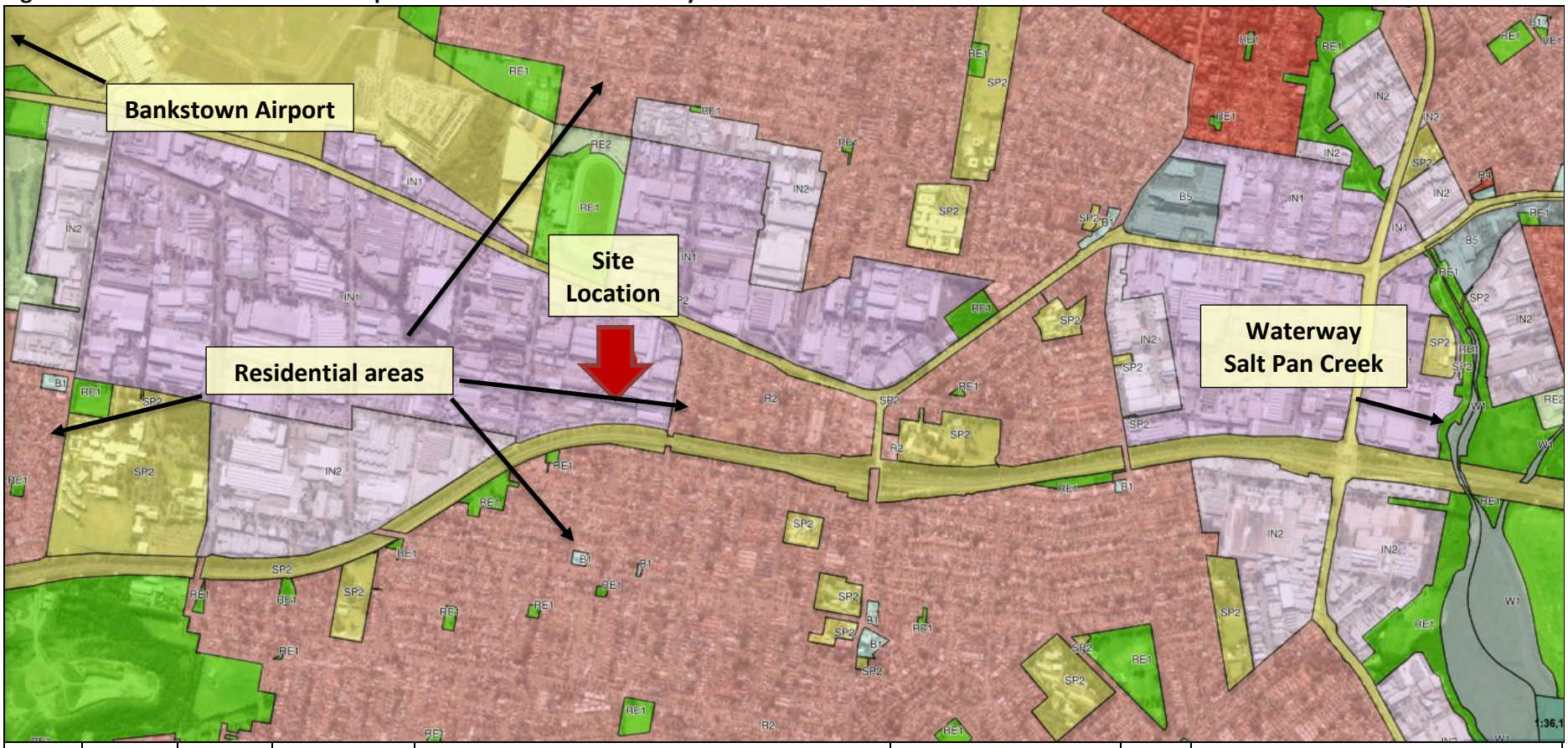
The site is not subject to local flooding, and is identified within the Salt Pan Creek Flood Planning Map (Figure 2.4) within the low flood risk precinct. The finished floor level of the development is above the 100-year flood level and can be adequately utilised to store goods above the 100-year flood level. The site does not include the storage of any polluting or potentially hazardous materials within the 100-year flood levels. The existing building is iron cladding 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 in flood risk to the local area. No new building work or alterations to the existing buildings are proposed for the Facility.

The site is located outside of the protected riparian corridor area under the *Bankstown Development Control Plan* 2015, which places certain requirements on developments within 40m of the top of creeks and stream banks (see Figure 2.5). The Tyre Recycling Facility is approximately 2.8k west of Salt Pan Creek. Mitigation processes are in place in any case to minimise the risk of any impacts on natural vegetation and areas of conservation significance (see EMS Chapter 3.7 for more details on processes to manage discharges to water).

2.3.3 Bushfire Prone Land

The site is not located in bushfire prone land (see Figure 2.).

Figure 2.3. Location of sensitive receptors near site. Site is shown by a red arrow.



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07/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	BSV Tyre Recycling Australia
						Title	Sensitive Receptors near Facility
						Scale	Not to Scale
						Source	JEP

Figure 2.4. Closest flooding Areas to site. Site boundary is shown as a red box.

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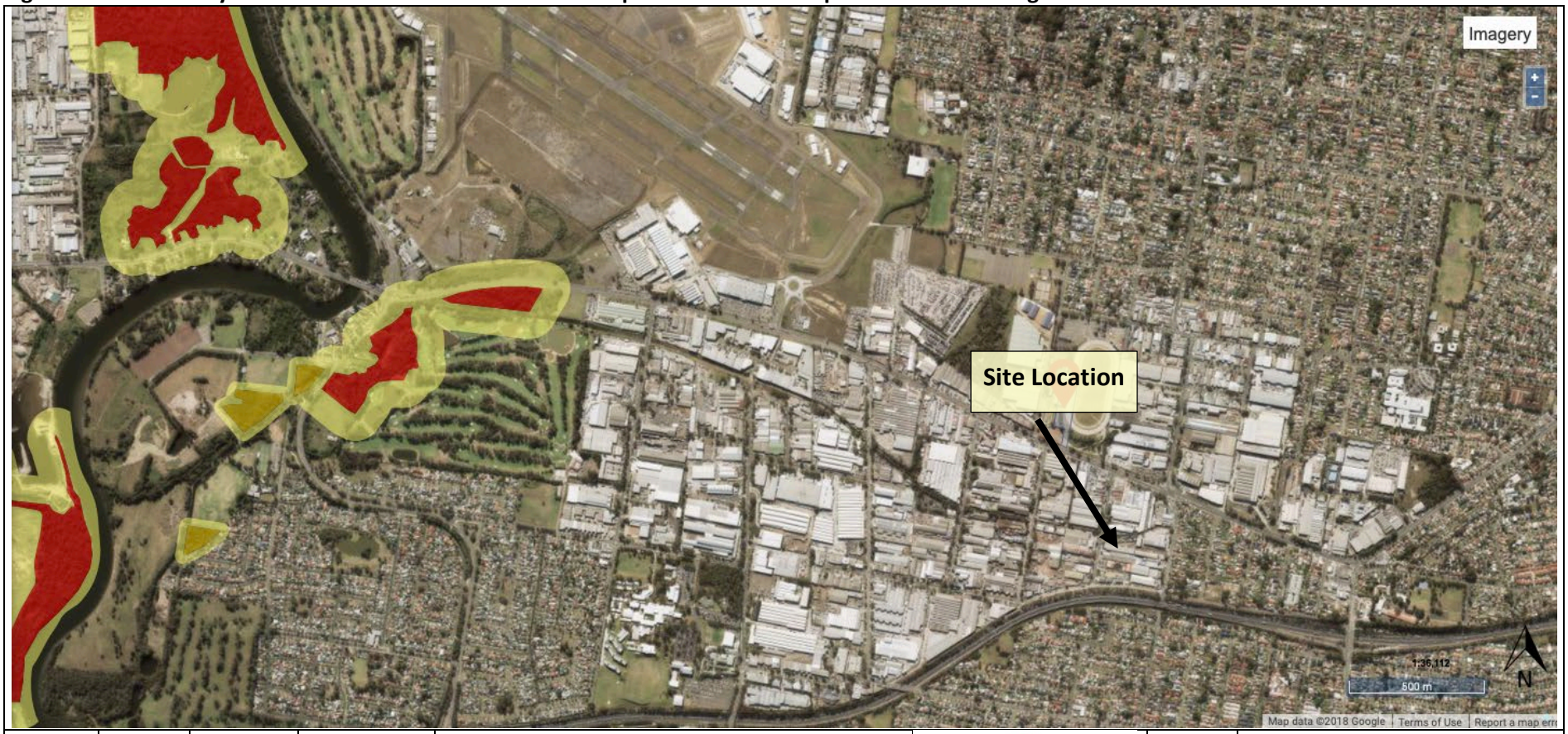
07/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	BSV Tyre Recycling Australia
						Title	Closest Flooding Areas to Site
						Scale	As Shown
						Source	Canterbury-Bankstown Council

Figure 2.5. Canterbury-Bankstown Council Bushfire Prone Map. SOURCE: NSW Department of Planning and Environment.



Date	Revision	Drawn By	Site description
07/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby

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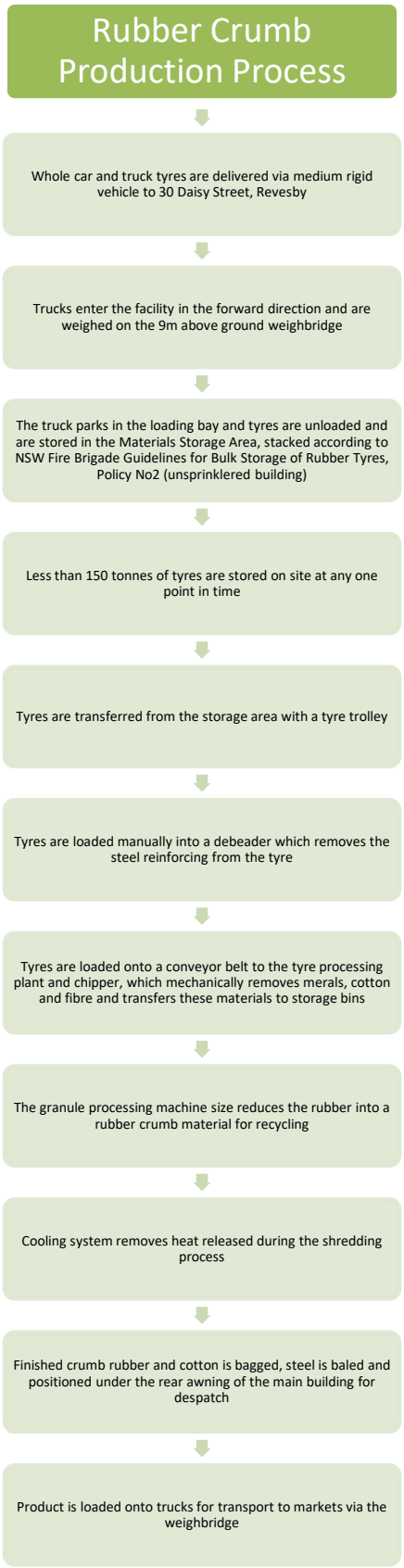
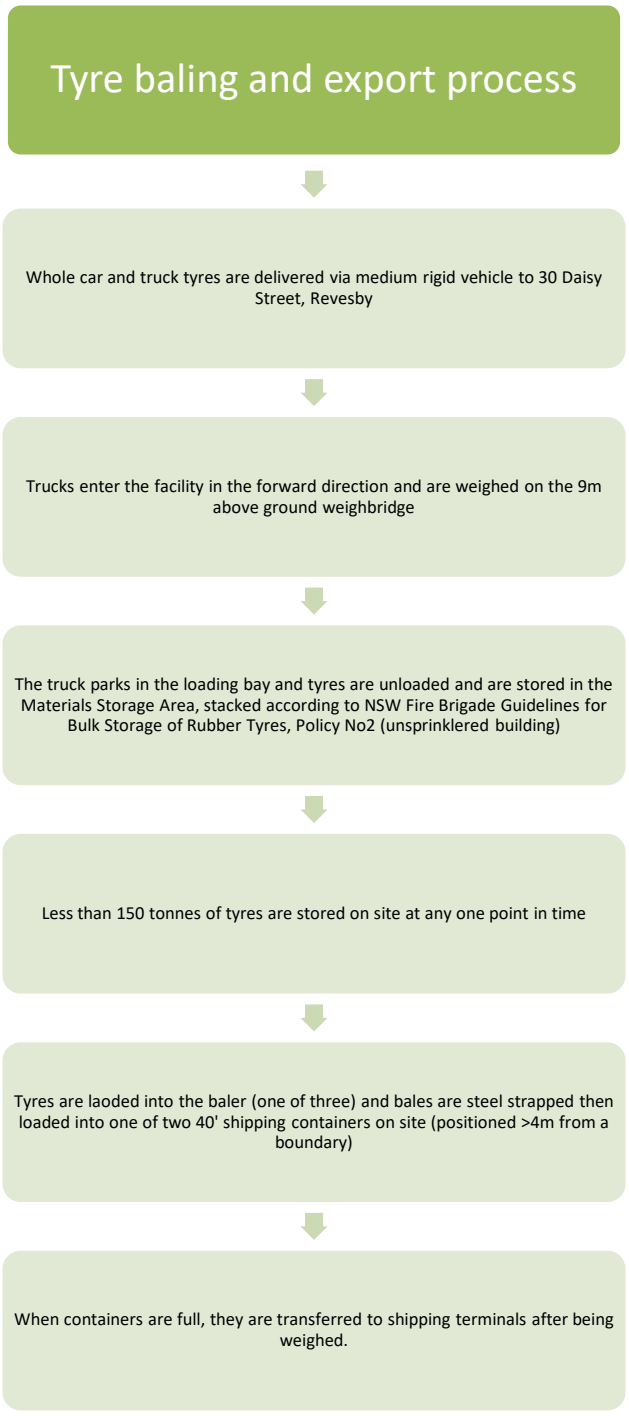
Client	**BSV Tyre Recycling Australia Pty Ltd**
Project	BSV Tyre Recycling Australia Facility
Title	Canterbury-Bankstown Council Bushfire Prone Map
Scale	As Shown
Source	NSW Dept of Planning

Figure 2.6. Flow chart summarising the operational processes of the tyre recycling operation.




Tyre baling and export process
Whole car and truck tyres are delivered via medium rigid vehicle to 30 Daisy Street, Revesby
Trucks enter the facility in the forward direction and are weighed on the 9m above ground weighbridge
The truck parks in the loading bay and tyres are unloaded and are stored in the Materials Storage Area, stacked according to NSW Fire Brigade Guidelines for Bulk Storage of Rubber Tyres, Policy No2 (unsprinklered building)
Less than 150 tonnes of tyres are stored on site at any one point in time
Tyres are laoded into the baler (one of three) and bales are steel strapped then loaded into one of two 40' shipping containers on site (positioned >4m from a boundary)
When containers are full, they are transferred to shipping terminals after being weighed.

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

Spill or leak of chemicals or hydrocarbons	•No storage of fuel will occur onsite. •All chemicals will be appropriately stored and labelled •Spill kits will be ready accessible and maintained •Material Safety Data Sheets for all chemicals will be available on site
Excessive dust emissions	•External area of the site (hard stand and roadways) are sealed •Tyre processing and storage always to be carried out indoors •The warehouse floors will be swept regularly to avoid dust tracking via vehicle movements •Outdoor hardstand areas regularly swept to minimise dust
Fire	•Stockpiles will remain under the prescribed limit •Fire extinguisher, fire hose, hydrant system is available at different locations of machinery area, office and storage area •Staff will be trained in the use of fire extinguishers
Noise	•All processing to take place indoors •Suitable PPEs (ear muffs) to be used by all staff working in machinery area
Stormwater Contamination	•All tyres and tyre products to be stored and processed indoors at all times •Remove loose material from site enterance and exit •Enviropods checked and cleaned weekly and cleaned after every rain event •Activation of stormwater isolation valve
Natural disaster	•Appropriate insurance policies will be purchased •Staff will be trained in the emergency procedures
Vehicle collision	•Vehicle movement is controlled by road marking, sign posting and security staff •Speed limit for all vehicles in plant is 5km/hour
Litter	•Seperate bins are available for garbage and non-conforming waste •Small bins are placed in office areas •Toilet and washing facilities available for staff and visitors

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	Chemical store under mezzanine floor
Floor cleaners (disinfectant)	<20L	
Toilet cleaner	<20L	
Other cleaners (glass, table etc.)	<20L	
Grease	<240L	
Engine oil	<240L	

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; and
- Storage and Handling of Dangerous Goods Code of Practice 2005.

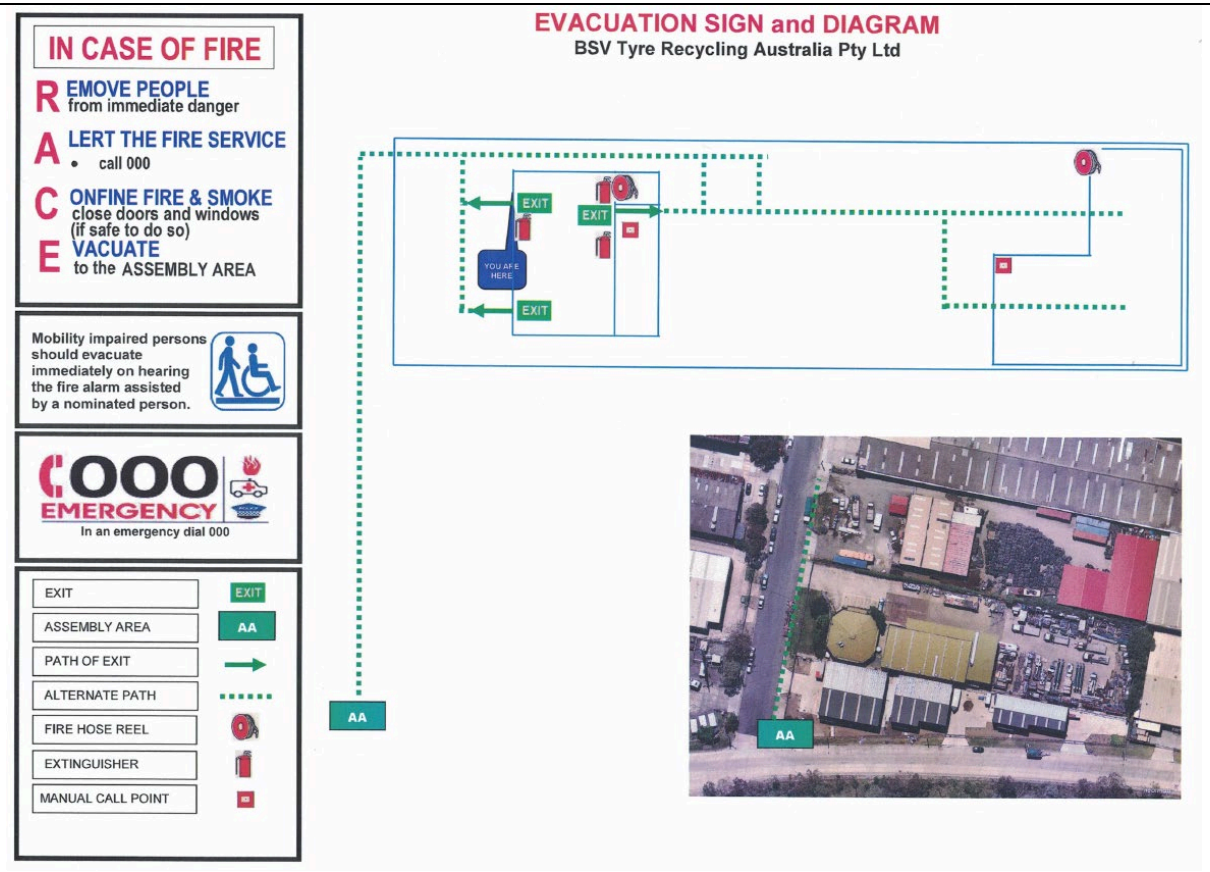
6. Safety and Clean-Up Equipment

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

Equipment	Location
Spill kits	1 in factory, 1 in Chemical Storage, 1 in rear Material Storage Area (shed)
Safety Data Sheets (SDS)	Office
First Aid Kit	Office
Fire extinguishers	3 Extinguishers 2 hose reels (locations given in Figure 6.1)
Fire hoses	Office
Fire Hydrant	Fire hydrant to be installed by 28 February 2019
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 30 Daisy Street, Revesby.



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01/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	BSV Tyre Recycling Tyre Recycling Facility
						Title	Evacuation Diagram
						Scale	As Shown
						Source	BSV

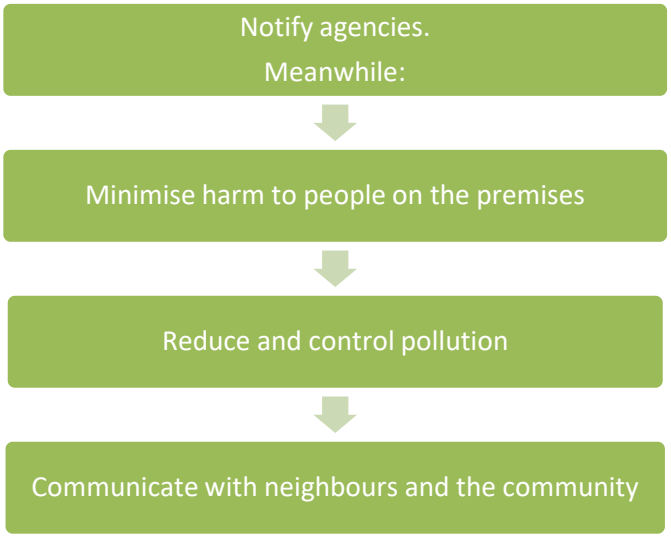
7. Contact Details and Responsible Persons

The person responsible for implementing this plan is the General Manager.

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

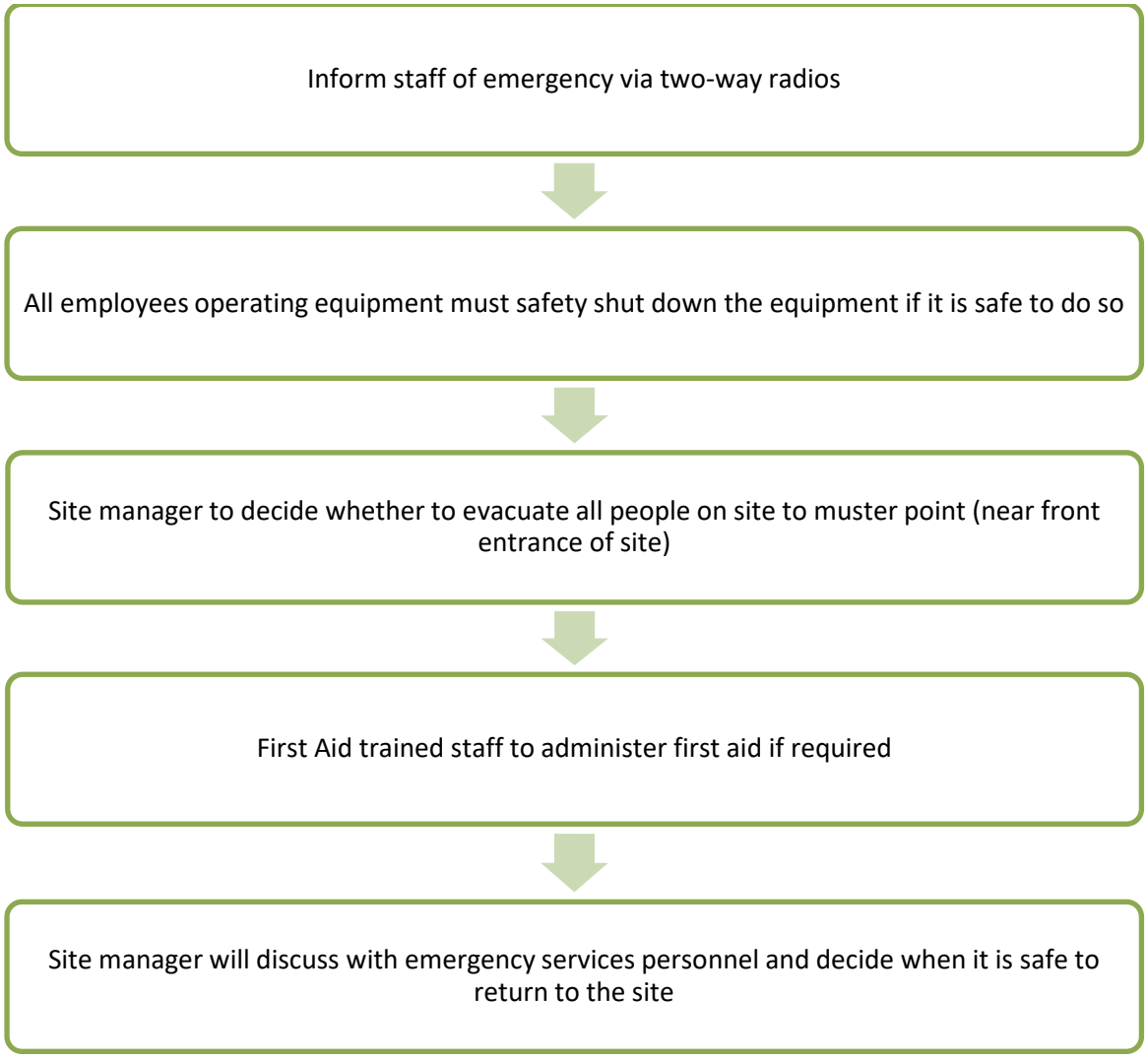
Primary site contact	• General Manager
Secondary site contact	• Operations Manager

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.

Address	Owner	Contact
18 Daisy Street	M&I Spares	(02) 9792 3439
22 Daisy Street	ISL Recyclers	(02) 9773 4826
26 Daisy Street	Japan Ceramics	(02) 9772 2088
37 Daisy Street	Dellow Conversions	(02) 9774 4419
29 Daisy Street	Transdev NSW	(02) 8700 0555
25 Daisy Street	Bent Glass	(02) 9773 1022
34 Daisy Street	InForme Signs	(02) 9773 6576
38 Queen Street	The Fencing Warehouse	(02) 9792 3222
32 Queen Street	ECCOSIT	(02) 9772 0580
37-55 Violet Street	Enviro Recycling	(02) 9792 5275

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.

Evaculation drills will be carried out at least once a year.

Improvements identified in the review and drills will 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
01/11/18	Revision A	M.Lochhead	30 Daisy Street, Revesby

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Client	BSV Tyre Recycling Australia Pty Ltd
Project	BSV Tyre Recycling Australia
Title	Evacuation Diagram
Scale	As Shown
Source	BSV