



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

ANZ

Document Name
PIRMP

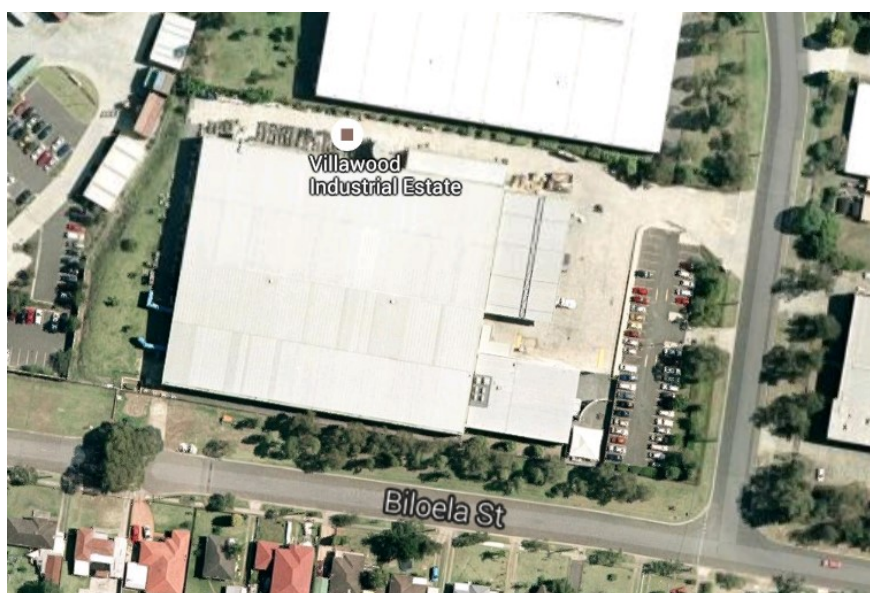
SIMS RECYCLING SOLUTIONS

72 – 80 Marple Avenue

Villawood

NSW

2163



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Authorised by:	Muhammad Shamim	Issue date	15 th August 2018	Revision Date:	August 2020

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1. Introduction:

Sims Recycling Solutions is a subsidiary of Sims Metal Management, one of the world's leading ferrous and nonferrous metal recyclers, with operations in Europe, Australia, USA, South Africa, New Zealand, China, South East Asia and the Middle East.

Established in 1995, Sims Recycling Solutions (SRS) now incorporates multiple sites to form a strong network of collection, processing and export facilities and is one of the Australasia's largest metals and Electronics recyclers. Our nation wide spread of operations offers a comprehensive range of products and services to the manufacturing and commercial industries and local and National Governments.

Our facility located in Villawood (New South Wales) is certified to ISO 9001:2008, ISO 14001:2004, OHSAS 18001:2007, AS/NZS 4801:2001, AS/NZS5377 and R2:2013 (Responsible Recycling)

Our services include:

- Processing and supply of ferrous and non-ferrous furnace feed-stock
- TV and Monitor Dismantling
- Shredding of commodities for internal recycling and export
- Waste from Electrical & Electronic Equipment recycling initiatives
- Recycling and export of plastic materials
- Asset Management recovery and destruction
- Toner recovery
- Battery recycling
- Secure data wiping

2. Legislative Requirements:

The Protection of the Environment Operations (Waste) Regulations 2014 has reduced the threshold at which processing, recovery and storage of waste triggers the requirement to hold an Environmental Protection Licence (EPL).

SRS Villawood does exceed this new threshold and is required to apply for an EPL.

Other legislation that is applicable includes:

- The Protection of the Environment Operations Act 1997 (POEO Act)
- The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulations 2012
- The Protection of the Environment Legislation Amendment Act 2011.

This Pollution Incident Response Management Plan (PIRMP) has been developed and written to comply with these legislative requirements

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The identified legislation places a duty on SRS as indicated:

- All holders of environmental protection licences must prepare a pollution incident response management plan (section 153A, POEO Act)
- The plan must include the information detailed in the POEO Act (Section 153C) and be in the form required by the POEO (G) Regulation (Clause 98B).
- Licensees must keep the plan at the premises to which the environmental protection licence relates or, in the case of trackable transporters and mobile plant, where the relevant activity takes place (Section 153D, POEO Act)
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E)
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licences must immediately implement the plan (section 153F, POEO Act).

3. Plan Objectives:

The objectives of this plan are as follows:

- To supplement the current facility emergency plan
- Ensure comprehensive and timely communications about a pollution incident have taken place by:
 - Discuss with all employees at the facility, as part of a “no repeat culture”.
 - To inform the Environmental Protection Authority (EPA), and other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and the Fire and Rescue service NSW) of an incident
 - People outside the facility who may be affected by the impacts of the incident (such as other business’s and members of the public who reside near the facility).
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and liability.

3.1 References:

Site Emergency Response Plan

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4.0 Hazard and Pollution Identification:

Site hazards have been identified in the Aspects and Impacts Register. See Appendix-2.

Both these systems are certified to the ISO 14001:2004, OHSAS 18001:2007, AS/NZS 4801:2001 and R2:2013 (Responsible Recycling).

There are no sensitive receptors in the immediate vicinity of the Villawood facility; therefore, the environmental impact due to any pollution incident is minimal. The site has controls in place to mitigate environmental impact due to firewater run-off. See section 5.1 – Safety/Response Equipment.

4.1 Pollution Inventory

SRS handles commodities that are sent from various clients / customers which would include local councils, Government departments, Global, International and local companies. These commodities are recorded upon delivery at the facility and type of further processing is to the customer's instructions.

The site handles electronic waste as solid waste, so no liquid effluent or waste is generated and entire site/operational area has impervious concrete flooring. Additionally, water is not used during any onsite processing activity; therefore, water contamination/pollution is not a concern. (Except fire water run-off, in case of emergency that is managed through Emergency response plan and this PIRMP). Water mist is used for dust suppression in the warehouse. This does not pose any environmental risk as the facility has impervious concrete flooring with no connection to the storm water drain system.

SRS Villawood EPA License Inventory Requirements:

Following inventory restrictions are defined in the EPA License;

Code	Waste	Description	Activity	Other Limits
F100	Waste ink, dye, pigment, paint, lacquer & varnish	Printer cartridges	Waste storage	No more than 25 tonnes of printer cartridges permitted to be stored at any one time
NA	Batteries	Batteries	Waste storage	No more than 30 tonnes of batteries permitted to be stored at any one time
NA	Electronic waste	Electrical and electronic consumer goods waste	Resource recovery Waste storage	No more than 20,000 tonnes of electronic waste permitted to be received per year

Additionally, as per the site EPA licence, the amount of CRT glass permitted on the premises cannot exceed 300 tonnes at any one time.

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The site has electronic inbound and outbound database and all these requirements are tracked continuously with a month-end stock-take report being generated. The site also report the data to the EPA's Waste and Resource Reporting Portal (WARRP) on monthly basis.

The site specific potential contaminants (non- processing commodities) are controlled and the lowest operational quantities are stored on site, to reduce the potential for an Incident. These include:

- a. Operational Oils and Greases (less than 500 litres held on site for day to day use)
- b. Diesel for mobile plant use (800 - 1000 litres)
- c. Gas bottles (4-6 bottles 15 kgs each - For use on mobile equipment)

The diesel is stored in double walled container that is placed on a bund on an impervious concrete flooring. Similarly, oil drums are also placed on a bund on an impervious concrete flooring. Controls in place are suitable for day- to -day operations, where these amounts are required to be increased, additional controls are put in place.

4.2 Hazard Identification and Assessment:

The definition of a pollution incident is:

“An incident or set of circumstances during or as a consequence of which there is a 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 substances has been placed or disposed of on a premise, but it does not include an incident of circumstances involving the emissions of any noise”

A pollution incident is required to be reported to the NSW EPA if there is a risk of “material harm to the environment”, which is defined in section 147 of the POEO Act 1997 as:

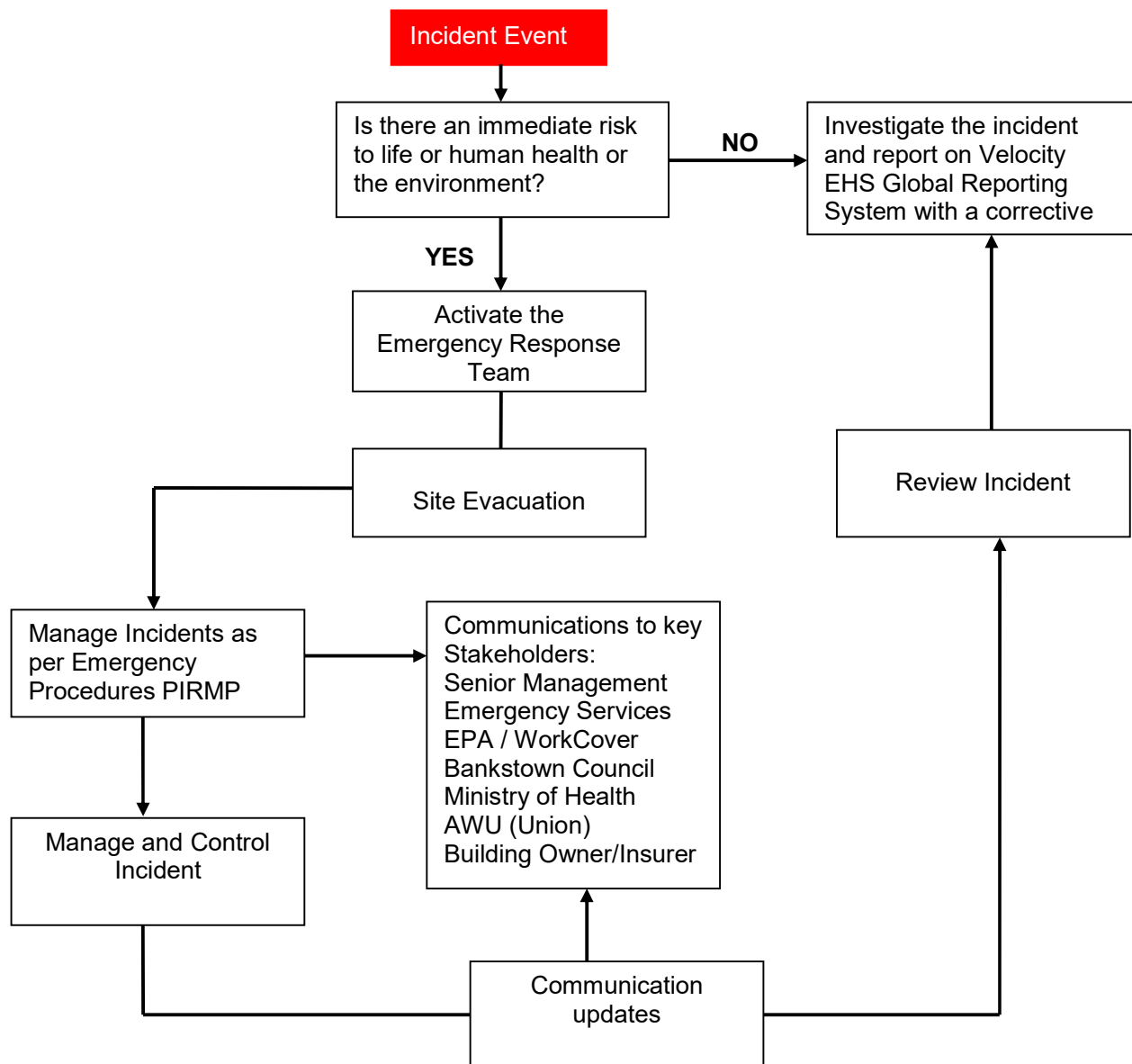
- (a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations),and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

An assessment of the facility has been undertaken to identify the main hazards to human health or the environment associated with a potential incident at the facility.

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5.0 Incident Response:

This section provides details on the incident response, including the communications on site and with the emergency response actions for responding to an incident that has resulted in a material impact to human health or the environment:



THE PRESERVATION OF HUMAN LIFE OVERRIDES ALL OTHER PROCEDURES / REQUIREMENTS

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5.1 Safety/Response Equipment;

The site has firewater system onsite; the warehouse and canopy is fitted with sprinkler system installed. The suitable portable fire extinguishers are mounted at various locations all over the site. The spill kits are placed at various locations onsite.

The storm water drains in the yard are fitted with fine mesh grating and drain wardens (Filter Cloth) to prevent any solid debris entering into the storm water drains. The site also has gel filled impermeable drain covers to be used to prevent firewater run-off, in case of any emergency.

6.0 Communication:

6.1 Internal:

In the event of serious injury to persons or a significant environmental incident, the SHEC Manager will immediately notify the General Manager ANZ.

All Incidents that are rated 3 or 4 on the VelocityEHS reporting systems are to be immediately notified to the Senior Operations Manager and SHEC Manager.

6.2 External:

Key external contacts that are required to be notified are listed below. If a pollution incident occurs where "material harm" to the environment is caused or threatened the notification protocol set out in section above is followed. If the incident presents an immediate threat to human life or property then "000" is to be called immediately.

External Contacts:	Daytime
Emergency Services	000
Environment Protection Agency (EPA)	Phone: 131555 Fax: 0299955999 Other: mailto:info@environment.nsw.gov.au
WorkCover NSW	Phone: 131050 contact@workcover.nsw.gov.au
Bankstown Council	Phone: 02 9707 9999 Fax: 02 97079495 mailto:council@bankstown.nsw.gov.au
NSW Public Health (Minister)	Phone: 02 9391 9000 Fax: 02 9391 9101

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Internal Contacts:	Appointment	Daytime Number	Out Of Hours
Graham Muir	General Manager ANZ	0736342001	0418762532
Tanya Bradley	National Operations Manager	0287082013	0400839605
Muhammad Shamim	SHECS Manager ANZ	0287082014	0427181196
Darren Dewhurst	Production Manager	0287082004	0447096374
Ali Nozari	Maintenance Engineer	0287082028	0400983248

6.3 Local Business:

The following businesses are to be considered in the event of the plan being activated

Company	Address	Phone Number	Point of Contact
Bronson and Jacobs	70 Marple Avenue	Phone: 02 8717 2929 Mob: 0417 465 273	Reception
Global Foods	60 Marple Avenue	Phone: 02 8717 1000 Mob: 0402 355 770	Reception
Vacant	61 Marple Avenue		
Vacant	61A Marple Avenue		

6.4 Local Community:

The local community stakeholders that are potentially affected by an incident will be notified immediately by SRS by actual physical means, which may include:

- Personally calling to residents homes
- Letter / leaflet drops
- Use of the emergency services

6.5 On site Incident Management:

An emergency response procedure is in place for the facility. This procedure outlines the actions required to be taken when there is an incident on site, which may result in a material impact to human health and or the environment. This procedure and this plan will be used in conjunction with each other to ensure that the impact of pollution incidents are minimised through early intervention

There are roles and responsibilities identified within the facility Emergency Plan.

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7.0 Communication

7.1 Internally:

This PIRMP (as part of the Emergency Plan Training) will be communicated to all employees / contractors:

- On Induction to the company
- Part of their annual training
- When an Incident occurs that required the activation of the plan (Post Incident Review)
- Significant changes to the plan
- On review after testing the plan
- Legislative changes

Copies of this plan will be given to and displayed as follows:

- Relevant Management Staff
- Response team members
- Displayed in employee rest rooms
- At the main reception
- Held by the security Guard

7.2 Externally:

The information on this PIRMP will be provided or displayed externally:

- Direct neighbours as identified in section 6.3
- Environmental Protection Agency (Copy of PIRMP)
- At the main entrance in the emergency Grab Bag Box (Copy of PIRMP)

7.3 Training:

Training in the PIRMP will be carried out annually to all employees in conjunction with the site Emergency Plan. Training shall provide information to employees on what is an environmental incident, how to minimise the impact, controls in place to ensure storm water drains are not impacted, and a requirement to report any incident to the NSW EPA.

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7.4 After the Incident:

SRS will provide written details of the incident to the NSW EPA or any other authority within 7 days of the date on which an incident occurs.

8.0 Testing of the Plan:

The plan will be tested at least annually and it is aligned to the site Emergency plan, and records will be retained and included within the Emergency Plan Testing Records. The plan will be tested within one month of any pollution incident, as well.

Further actions identified during the testing of the plan will require a corrective action to be raised in the VelocityEHS System, once complete the plan will be re-issued and training carried out, as required.

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RESPONSE TO FIRE EMERGENCY

In the event you discover a **FIRE** or detect the presence of smoke:

1. Activate alarm (Activation of Emergency Call Points located outside the main warehouse office, beside the spill kits at the manual bench or outside the toner room in the toner inbound area)
2. Dial 000 and ask for the FIRE Service; provide the following information:
 - Type of emergency
 - Location of the premises
 - Exact location of the fire and what is on fire.
e.g: The Main Office Building or Warehouse
3. Notify other relevant authorities as required.
4. Contact the Chief Warden; Chief warden shall take control of the scene.
5. Alert persons nearby
6. Area Fire Wardens or delegates to lead all onsite personnel (employees, contractors and visitors) to the Emergency Assembly Point.
7. If the fire is small enough use a nearby fire extinguisher to control and/or extinguish the fire.
8. Do not fight a fire if it is unsafe to do so. This may occur if the following conditions exist:
 - You don't know what is burning.
 - The fire is spreading rapidly.
 - You have not been trained in the use of fire fighting equipment.
 - You do not have the proper equipment.
9. Chief Warden or delegate shall receive the Emergency Services and guide them to the site.

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RESPONSE TO SPILL/POLLUTION INCIDENT

- In the event of any pollution incidents affecting or likely to go down the site drains or through the interceptors, therefore affecting storm water, report it IMMEDIATELY to your supervisor or Chief Warden.
- EPA / Work Cover must also be notified
- While handling a spill always wear the appropriate Personal Protective Equipment (PPE).
- NEVER wash the spill into drains or manholes or allow them to seep into the ground.
- Prevent vehicles, plant and pedestrians from entering the area.
- Gel filled drain protectors are to be placed over any storm water drain at risk of run-off (Water from fire hoses/ Large spills). These Gel filled drain protectors are located under the stairs to the mezzanine floor.
- Never use detergents to clean the area.
- Use the appropriate spill kit for the job i.e. oil, chemicals or general purpose etc.
- Always replace the material from the spill kits that you have used, as soon as the spill has been cleaned up properly.

All pollution Incidents are to be reported on the VelocityEHS.

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Control document amendments:

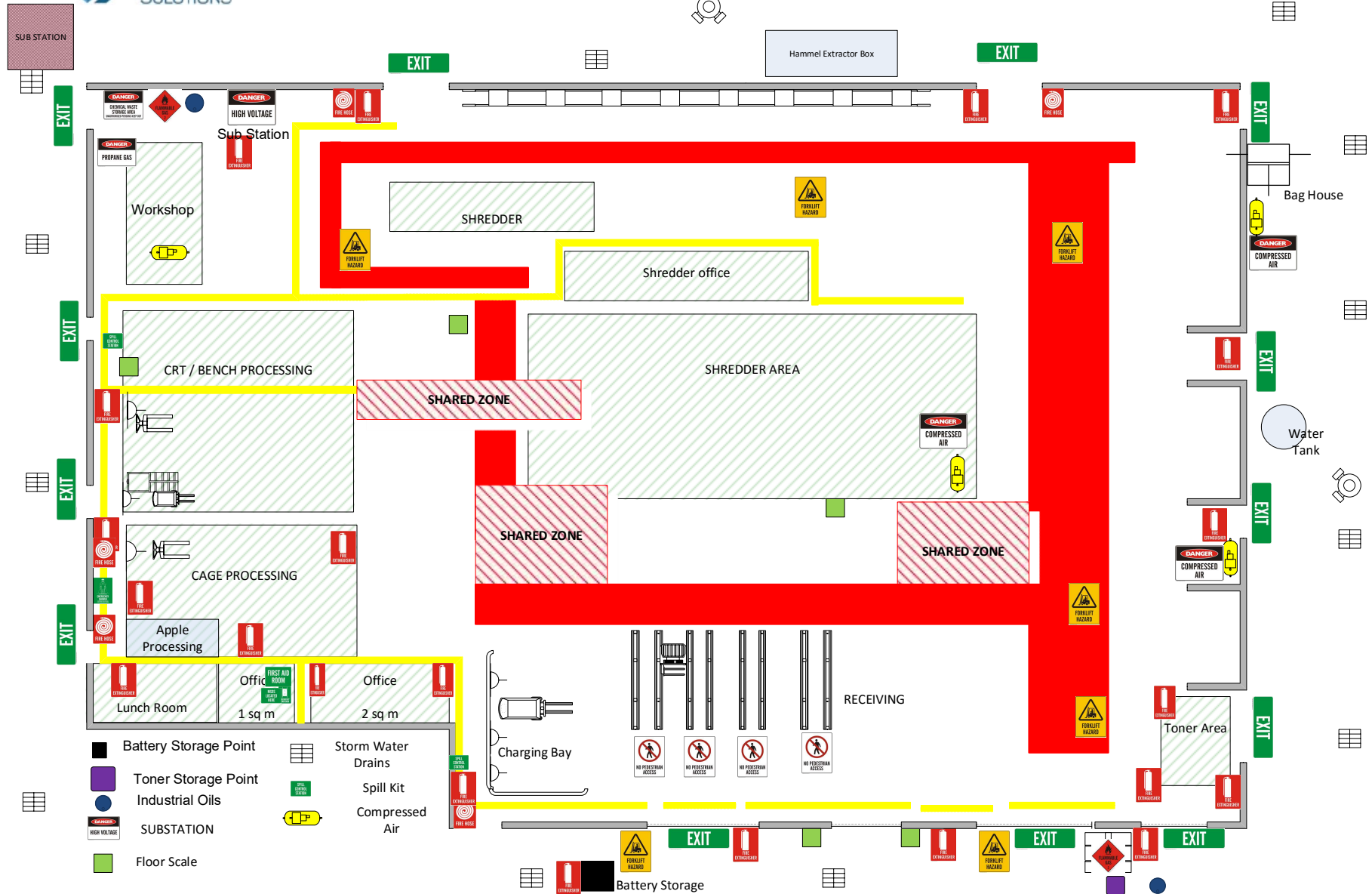
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Srl	Rev	Amendment	Reason	Authorised by:	Date:
1	1	Initial construction of the document	Initial document compilation	Paul Meehan	16/06/2015
2	2	IMEA detached, reference to AS5377 certification, personnel changes	Periodic Review	Muhammad Shamim	01/07/2016
3	3	To incorporate EPA desktop audit comments	Periodic Review	Muhammad Shamim	15/08/2018

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APPENDIX-1 Villawood Floor Map

Main junction drain
to prospect creek



Appendix 2- ENVIRONMENTAL ASPECT EVALUATION VILLAWOOD

Activity/Agent	ASPECTS	F	L	S	I	IR	Details and Existing Controls	F	L	S	I	RR	Items that affect likelihood
CRT Glass	Landfill, Air Pollution, Health risk, spills	4	3	2	1	21	Safe working procedures, CRT training carried out to relevant employees, storage and handling on impermeable concrete flooring, frequent housekeeping and spill kits provided. Safety conversations and Job Cycle Checks carried out to ensure compliance with procedures	4	2	1	1	12	Safe Working Procedure (SWP) not followed, employees not trained, in-effective housekeeping, no compliance checks etc.
Batteries	Fire, spill, Landfill and Air Pollution,	5	3	3	2	40	Batteries may ignite and there is a risk of fire damage. Different types of Batteries segregated and managed via Batteries handling and Storage protocol, Risk Assessment in place, sprinkler system, fire extinguishers, employee training. Lead acid batteries are stored on non-conductive pallets.	4	2	2	1	18	SWP not followed, employees not trained, batteries not stored appropriately, safety systems not maintained.
Toner (mainly powder)	Fire, Landfill and Air Pollution	4	3	2	2	28	Toner Cartridges may ignite and there is a risk of fire damage. Toners are removed and sent to toner processing area. SWP, dust extraction system, housekeeping. Toner stored inside warehouse or sealed drums under cover of awning	4	2	2	1	18	SWP not followed, employees not trained, dust extraction failure, improper toner storage.
E-Waste Receipt and Storage	Fire, spills, drain water contamination,	5	3	2	2	32	Fire Fighting equipment, Workforce firefighting, Emergency Plan, Spill & PIRMP training. Firefighting equipment inspection & maintenance by external contractors. Fire risk assessment & external fire audits annually. Entire site has impermeable concrete flooring. Spill kits provided. Drain warden & filter mesh installed, gel filled drain covers for emergencies, weekly drain mesh cleaning	4	2	2	1	18	Inbound SWP not followed, Stockpiles not managed, batteries not removed. Storm water drain filter failure, safety systems not maintained.
Dust Emissions	Air Pollution	4	3	2	2	32	General dust being generated from processing operations. 3 Dust extraction system installed. Planned Preventative maintenance schedule in place. Water suppressant system installed at the bunker to control dust emissions. Frequent Housekeeping. Employees wear dust masks to minimise exposure.	4	2	2	1	18	Dust extraction failure or in-effective PM of equipment., in-effective housekeeping, water suppressant system failure, no use of dust mask,
Chemical (Diesel, oil or greases)	Fire, Spill, Air pollution	4	2	2	2	24	Only minimal quantity stored. SDS of all chemicals. Diesel stored in double walled container on secondary bund, whereas oil drums are placed on secondary bunds. Firefighting equipment. Entire site has impermeable concrete flooring; spill kits provided, sprinkler/, Employee training on normal operations & emergencies.	4	2	2	1	18	Secondary bunds not used, excessive quantity stored onsite, employees not trained on SWP or on ERP.
Mobile Equipment/ vehicle Movement	Noise, Air Pollution, Spill, fire	5	3	2	2	32	SWP for mobile equipment and vehicle movement, employee and contractor training, mobile equipment preventive maintenance, spill kits, fire extinguishers	4	2	2	1	18	SWP not followed, employees not trained, in-effective PM of equipment

RATINGS:

F	Frequency	5 = Repetitive	4 = Daily	3 = Weekly	2 = Monthly	1 = Infrequent	If the rating is less than 20 then aspect not significant	
L	Likelihood	5 = Certain	4 = Very Likely	3 = Likely	2 = Possible	1 = Very Unlikely	If the rating is greater than 21 but less than 49, then controls measures are required	
S	Severity	5 = Disaster	4 = Long Term	3 = Medium Term	2 = Short Term	1 = Slight		
I	Impact	5 = Global	4 = National	3 = Regional	2 = Local	1 = Yard Only	If the Aspect is equal to and greater than 50 the aspect is Significant	

Appendix 3 – Location Map

