LUDDENHAM ADVANCED RESOURCE RECOVERY CENTRE

Pollution Incident Response Management Plan

10 APRIL 2025

DOCUMENT CONTROL

Occupant:	Renier Recycling Luddenham Pty Ltd (RENIER GROUP)
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RECORD OF PIRMP TESTING

PRM Revision	Test Date	Test Method	Tested by	Next Scheduled date

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1 INTRODUCTION

1.1 Overview

The Trustee for Coombes Family Trust No. 13 (Coombes Property Group), in partnership with KLF Holdings Pty Ltd (Renier Group), has received development consent to construct and operate the Advanced Resource Recovery Centre (ARRC or facility). The ARRC is located at 275 Adams Road, Luddenham, in the Liverpool local government area (LGA). The facility is designed to receive and process up to 600,000 tonnes per annum (TPA) of non-putrescible general solid waste. This waste stream includes building and demolition waste and commercial and industrial waste, all of which will be recycled.

The ARRC will be built and operate under an Environmental Protection Licence (EPL 21981) issued to Renier Recycling Luddenham Pty Ltd (Renier Group) for resource recovery and waste storage.

In accordance with the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

During the construction stage, the construction contractor will be responsible to implement the PIRMP.

1.1.1 Stages

The PIRMP currently addresses a Construction Stage of the ARRC development and will be updated to include Stage1, Stage 2 and Stage 3 as these stages come online. The indicative timeline for these stages is provided in Table 1-1 below.

Table 1-1: *Indicative timeline for ARRC stages*

Stage	Limits	Comment
Construction Stage	N/A	The construction stage is expected to take 12-18 months, subject to weather conditions and construction contingencies.
Stage 1 Operations	The capacity at 200,000 TPA	Progression beyond each barrier is contingent on demonstration of acceptable environmental performance in respect of airport safeguarding, noise and traffic at each stage to the Planning Secretary.
Stage 2 Operations	The capacity at 400,000 TPA	
Stage 3 Operations	The capacity at 600,000 TPA	

1.2 Legislative Requirements

This PIRMP has been prepared in accordance with the requirements of Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO (General) Regulation) to provide personnel with a framework defining the way pollution incidents are managed, reported and communicated to the general community, and to the relevant NSW government authorities and services.

As defined by the EPA Guideline: Pollution Incident Response Management Plans (September 2022), the purpose of this plan is to:

- Establish clear and effective notification, action and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately;
- 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; and

- 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 suitability.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of s. 147 of the POEO Act) is caused or threatened, the person carrying on the activity will immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

1.3 Pollution Incident Definition

POEO Act defines **pollution** as: "Pollution means – water pollution, or air pollution, or noise pollution, or land pollution."

The POEO Act defines a **pollution incident** 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 POEO Act (s. 147) defines **material harm to the environment** as:

(1) For the purposes of this Part –
  (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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

2 LIKELY HAZARDS TO HEALTH AND ENVIRONMENT

Once the ARRC is built, it will be permitted to receive building and demolition, non-chemical manufacturing waste, wood waste, asphalt waste, soils, paper and carboard, households waste, office and packaging waste for recycling as value added materials and intends to achieve a recovery rate of 85% from processing incoming materials. This PIRMP discusses hazards related to the construction Stage of the ARRC.

Identified hazards to health and the environment on site are detailed in the table below. Each potential hazard has been assessed in accordance with the Risk Assessment matrix which is discussed in section 2.1 of this plan.

Table 2-1: *Major hazards, circumstances and pre-emptive measures*

Potential hazards	Likelihood of occurrence	Events that could increase likelihood	Pre-emptive measures
Dust	1 Low	Dry, windy conditions	• Use dust suppression • Inspection and Testing
Windblow Waste	4 Low	Windy conditions Incorrect waste operating procedure	• Site Induction • Toolbox Talk – waste management • Regular inspection
Noise	1 Low	Specific activities outside normal operations	• All machinery is regularly maintained and serviced to ensure compliance with manufacturers standards. • Selection of acoustically efficient device, plant and equipment for the task or application or with acoustic insulation.

Fuel spill/Oil/lube spill	7 Medium	Diesel spill from onsite diesel refueling tank or mobile refueling tank Bund failure, plant and equipment failure Plant and equipment failures	• Inspection and Testing • Bunding in a good order • Bunding is used for refuelling form the mobile refiling truck • Plant and Equipment regularly serviced
Chemical spill	7 Medium	Increase current low volumes of chemical storage	• Inspection and Testing • Bunding • Spill kits available at the storage area
Fire	13 Medium	Prolonged dry weather, incompatible waste types being mixed, smoking occurring outside of the designated areas	• Regular inspection • Firefighting Equipment
Contaminated materials/soils (asbestos)	3 Low	Lack of governance relating to verification of source material or lack of inspections	• Site Induction • Toolbox Talk – unexpected finds procedure
Stormwater contamination	5 Low	Contaminated storm water runoff (sediments) and from the site resulting from prolonged wet weather	• Regular inspection and maintenance • Water Quality Monitoring

2.1 Risk Matrix

Each potential hazard has been assessed in accordance with the Risk Assessment matrix as discussed in the table below.

Table 2-2: *Risk Matrix*

	Consequence				
	Negligible Injury – First aid treatment	*Minor Injury – Injury requiring medical treatment*	*Moderate – Injury requiring extensive medical treatment*	*Major– Injury resulting in permanent incapacitation*	*Catastrophic Injury – Injuries resulting in single or multiple deaths*
	Negligible or no quality damage/impact	*Minor quality damage/impact*	*Significant quality damage/impact*	*Major quality damage/impact*	*Extensive quality damage/impact*
	Negligible or no environmental damage/impact	*Minor environmental damage/impact*	*Significant environmental damage/impact*	*Major environmental damage/impact*	*Extensive environmental damage & biodiversity degradation*
Likelihood	*Negligible financial loss <=$5K*	*Minor financial loss $5K-$50K*	*Substantial financial loss $50K-$500K*	*Significant financial loss $1m+*	*Extreme financial loss $5m+*
Almost certain	11 Medium	16 High	20 High	23 Extreme	25 Extreme
Likely	7 Medium	12 Medium	17 High	21 High	24 Extreme
Possible	4 Low	8 Medium	13 Medium	18 High	22 High
Unlikely	2 Low	5 Low	9 Medium	14 Medium	19 High
Very Unlikely	1 Low	3 Low	6 Low	10 Medium	15 High

2.2 Pollution Inventory

Construction of the metal clad warehouse over a footprint of 13,230 m^2 has by its nature a limited list of typical pollution types which require consideration.

Pollutants likely to be used during construction of the ARRC include such things as fuels, oils, paints, as well as other chemicals. Below is a list of Polluting Substance Storages/Uses for the ARRC construction stage with the estimated maximums stored.

Table 2-3: *Pollution Inventory and maximum quantity*

Potential Pollutants	Maximum quantity stored on site	Storage
Disel fuel	200L	Site compound/ bunded chemical storage
Concure- concrete curing compound	200L	Site compound/ bunded chemical storage
Hydraulic oil	100L	Site compound/ bunded chemical storage
Engin oil	100L	Site compound/ bunded chemical storage

2.3 Premise and Environmental Maps

Environmental Maps are provided in Appendix A of this plan. Emergency Response Plans and Environmental Maps will be displayed in strategic locations within site offices/ notice boards.

Maps will include the following information:

- Location of fire extinguishers, hose reels
- Location of assembly and evacuation points
- Location of stormwater and natural drainage lines within, and immediately adjacent to the site
- Storage areas for potential pollutants (e.g. storage areas).
- Location of any equipment, etc, that is store for use in managing an incident (e.g. spill kits; shovels; sandbags).

2.4 Safety equipment

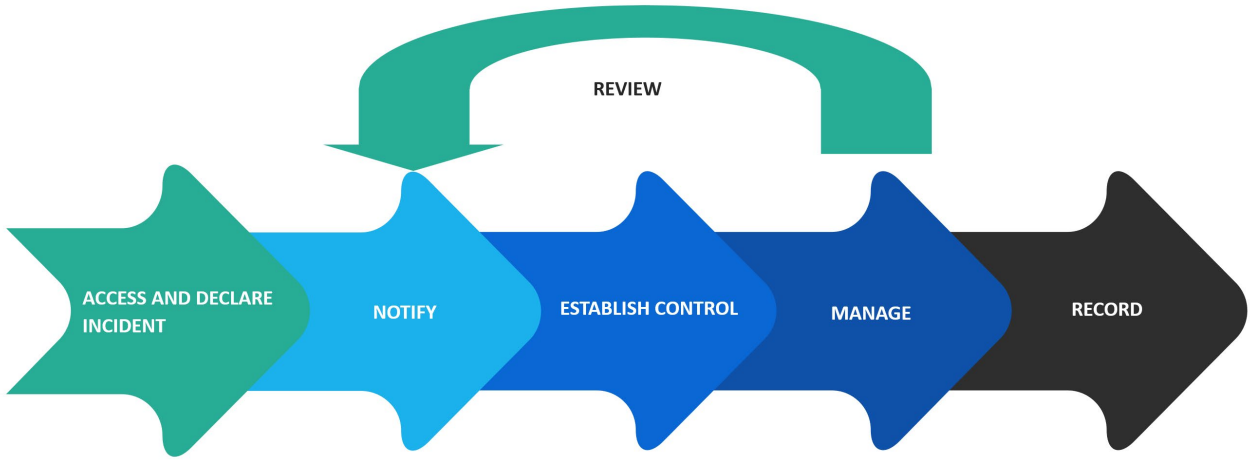
The following equipment is provided to prevent or control and assist with pollution incidents. The locations of these equipment are within the worksite and main site compounds as appropriate and are indicated in SEPs, where applicable:

- Spill Kits– in key locations across the ARRC;
- Safety Data Sheets (SDS)- in designated chemical storage containers/main site compounds; and
- Sediment control and containment equipment including sandbags, gravel, geofabric and sediment fences.

Other plant and equipment present at the site or sourced externally may be used in the management of any pollution incident, including for example excavators, sucker trucks etc. The equipment required to be utilised in response to a pollution incident would be determined by the Site Manager in consultation with the Project Environmental Manager.

3 POLLUTION INCIDENT RESPONSE PROCEDURE

The generic response procedure is shown in figure below and documented in the table below.



<table>
<tr><th>Task Details</th><th>Incident Management Procedure</th><th>References</th></tr>
<tr><td>1. Access and declare incident
Actions to determine initial incident level</td><td>Assess and declare the incident based on the potential for it to escalate. Initial assessment looks at impact on:
Safety
Community
Environment
Reputation and media interest.</td><td>Criteria/triggers for activation</td></tr>
<tr><td>2. Notify
Actions to notify affected stakeholders following predefined business rules and other direction</td><td>Notify the relevant regulatory authorities:<table><tr><th>Contact</th><th>Telephone Number</th></tr><tr><td>NSW Fire and Rescue, Police and Ambulance</td><td>000</td></tr><tr><td>NSW EPA Environmental Hotline</td><td>131 555</td></tr><tr><td>SafeWork NSW</td><td>13 10 50</td></tr><tr><td>Liverpool Public Health Unit</td><td>(02) 8778 0855 (Business Hours)
(02) 9828 3000 (After hours)
- ask for Public Health Officer on call</td></tr><tr><td>Liverpool City Council</td><td>1300 36 2170</td></tr></table>Other authorities may also be notified depending on the impacts of material harm.</td><td>Regulator / External and Internal Notifications Assistance & Coordination</td></tr>
<tr><td>3. Establish control
Actions to determine incident leadership and to exercise control over the event</td><td>Review initial situation
Identify incident types (e.g. fire, spill, collision, hazard)
Commence incident internal nonfiction processes
Cease works immediately
Make area safe</td><td>Incident and Injury Management Procedure
Emergency Preparedness Procedure</td></tr>
<tr><td>4. Manage the incident
Actions to contain the event and restore services</td><td>Contain incident (if possible)
Implement relevant plans and procedures (e.g. Spill Procedure)
Implement communications protocols
Review and monitor effectiveness of response</td><td>Incident and Injury Management Procedure
Related procedures to be implemented</td></tr>
</table>

Task Details	Incident Management Procedure	References
5. Record the incident Actions to record event details, investigations and debrief reports	• Collate all event records • Record the events • Debrief incident in accordance with business rules • Commence incident investigation • Update risk registers and the PIRMP (if required)	Debrief procedure Corrective and Preventive action Procedure

3.1 PIRMP Activation and Notification

The Project Environmental Manager and Coombes Property Group/ Renier Group Project Representative are the responsible persons available to notify under the PRIMP. The Project Manager is responsible for the initial incident response and the Project Environmental Manager is responsible for the notification requirements.

The Project Environmental Manager will make a decision based on the Environmental Incident Classification and Reporting Procedure what level of notification and callout is initially required for the incident.

The Project Environmental Manager or delegate will immediately notify the authorities listed in the below table of pollution incidents on or adjacent to the site where material harm to the environment is caused or threatened.

Emergency contacts are provided in Section 3 of this plan.

3.2 Notification to Community

In the event of a pollution incident, RENIER GROUP has the following processes for contacting the community:

Renier Group will consult with the local authorities to determine if the community is to be notified of the pollution incident. Renier Group will discuss with the authorities the most relevant communication strategy (e.g. social networking groups, direct contact with those potentially impacted).

Contact with the community to be then completed as per the agreed communication strategy.

The results of the investigation of any pollution incident resulting in material harm will be placed on the project webpage.

3.3 Incident Response

If safe to do so (e.g. non-hazardous substance spill within a safely accessible location), the site personnel are to implement immediate actions to secure the scene and control, contain and clean up a pollutant to minimise the potential of material harm to the environment.

In the event Fire and Rescue NSW demobilise from the incident as their services can be provided by third parties, ISS First Response will be engaged to assist in specialist emergency response, containment, and incident clean-up. ISS First Response provides an emergency response call centre service and provides full time emergency response, incident management and specialist response services such as deployment of vacuum trucks, transportation of controlled wastes and other services.

3.4 Incident Investigation

All incident investigations shall include the following basic elements:

- identify the cause of the incident;
- identify the necessary corrective action(s);
- identify personnel responsible for carrying out corrective action(s);
- implement or modifying controls necessary to avoid repetition.

4 AVAILABILITY OF PIRMP

The PIRMP is available in printed form at the premises. The PIRMP is publicly available on the project website. It must also be made available at the request of an authorised EPA officer, response agencies during an incident, and members of the public on request.

5 STAFF TRAINING

All ARRC personnel and sub-contractors are trained to respond to emergency scenarios, including pollution incidents. Also, this PIRMP is being implemented through staff training. Staff training takes the form of ensuring staff are aware of the location of the plan and its contents. It also ensures that the relevant contact personnel are known by staff in case an incident occurs.

During regular site safety meetings, hazards and ARRC's responses to these hazards are discussed. Preventative measures (refer to Section 3 of this plan) are raised in this forum.

6 TESTING AND REVIEW

The testing of this PIRMP will be coordinated by the Project Manager, Project Engineer or Project Environmental Manager to ensure the information is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

The POEO (General) Regulation states that the testing must be performed routinely at least once every 12 months and within 1 month of pollution incident which caused or threatened material harm to the environment.

To meet this requirement one of two methods is used for PIRMP testing:

- Desktop simulation – desktop simulation completed by a competent person; or
- Emergency drill – mock emergency or emergency drill, involving all workers. The emergency drill typically has both safety and environmental components, although may instead consist of two separate emergency drills to test these components.

A detailed record of the PIRMP testing is prepared after each conducted testing. The dates of testing and the name of members who conducted or participated in the testing are included in the test report. If the test identifies any shortcomings in the plan, it will be corrected, and appropriate non-conformance actions will be undertaken. The plan will be reviewed and updated according to the following:

- 12 months from the last update
- Within one month of a pollution incident occurring which caused or threatened material harm to the environment (as defined in the Act)
- As identified after testing of the plan.

The PIRMP will be reviewed an updated prior to commencement of Stage 1 Operations.

APPENDIX A – PREMISSES MAP (DETAILED)

KLF - REV 4 - 28/03/24