



29C DAVIS ROAD, WETHERILL PARK NSW 2164 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

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EMERGENCY SERVICES INFORMATION PACKAGE

SITE LOCATION:

The site is located at No29C Davis Road, Wetherill Park as identified in Figure 1.



Figure 1-Site locality plan

HOURS OF OPERATION:

The proposed hours of operation are from 5.00am to 6.00pm Monday to Saturday.

BRIEF DESCRIPTION OF WORKS:

Shred-X is a secure document and data destruction company that collects paper & cardboard from various commercial and government clients and then upon delivery to the facility initially sorts the material, shreds and bales it into a compacted form which is then transported to a recycling facility.

Shred-X also offers electronic data destruction services and repurposing of electronic assets. The data destruction services can be undertaken on a mobile basis or plant based however the majority is undertaken on site at the premise.

Areas of the site that are potentially hazardous during a fire emergency have been determined to be the shredder, electrical equipment and the bale storage locations.

The potential for fire is electrical fault or the shredder sparking and igniting undesired materials in the wastepaper.

The main hazards associated with this shredding and baling operations are entanglement, crushing, cuts, lacerations, slip, trip and fall. The risk of these hazards depends on exposure.

The nearest waterway is prospect creek that is located south east of the site. The site is equipped with storm water isolation value to contain all spills and any contaminated firewater. There are automated fire sprinklers, fire hose reels and fire extinguishers are installed throughout the facility.

The location of nearest fire services is: Fire and Rescue NSW Smithfield Fire Station 875 The Horsley Dr, Smithfield NSW 2164

1. INTRODUCTION

This document describes the Pollution Incident Response Management Plan for Shred-X Pty Ltd at 29C Davis Road, Wetherill Park.

All personnel and contractors working at the site should be made aware of the general contents of this document and accompanying procedures.

It is a requirement that all those employees responsible for emergency response activities, as defined by this document, have a copy of this plan and receive the appropriate level of training needed to ensure the effective implementation of the respective emergency and pollution incident response procedures identified in this plan.

The plan is designed to cover all emergency and pollution incidents conditions that could be reasonably anticipated at the site.

1.1 DEFINITION OF AN EMERGENCY

An emergency situation can be defined as any abnormal or dangerous event that may adversely affect the safety or well-being of nearby persons, communities or the environment. Under these circumstances, the occupants of the said premises are called to immediately respond to the emergency situation in an effort to control, correct and return the dangerous situation to a safe condition.

If there is any doubt, an event should be treated as an emergency and the procedures stipulated by this plan should be followed. Note that all fires are to be treated as emergencies.

The three levels of emergency are defined as:

- LOCAL ALERT: Any emergency situation that threatens human lives, property or the environment at one location of the Site, but is not likely to spread to other areas of the Site or the property;
- SITE ALERT: Any emergency situation where effects may spread to other areas on the Site; and
- **EXTERNAL ALERT:** Any emergency situation where effects may spread and impact on people, property or the environment outside the site boundaries, such as a grass fire.

Each of these three levels of emergency may be further classified as follows:

- **MINOR EMERGENCY:** An emergency situation that can be handled entirely by the Site's emergency response personnel without the assistance of the respective public emergency services; and
- **MAJOR EMERGENCY:** An emergency situation that requires the assistance of the public emergency services i.e. ambulance, fire brigade or police services.

An EXTERNAL ALERT is automatically a MAJOR EMERGENCY, as action cannot be taken outside the site boundary independently of the public emergency services.

1.2 DEFINITION OF A POLLUTION INCIDENT

The Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA) defines a pollution incident 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 any noise."

Under the Section 148 of the POEO Act, pollution incidents causing or threatening material harm to the environment must be notified immediately to the relevant authorities.

"Material risk of harm to the environment" is defined under Section 147 of the POEO Act as:

- (a) harm to the environment is material if:
 - (iii) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (iv) 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.

1.3 POLLUTION INCIDENT RESPONSE MANAGEMENT

There is an obligation on holders of environmental protection licences to prepare and implement a pollution incident response management plan (PIRMP) for each licensed activity.

Requirements for pollution incident response management plans (PIRMP) include:

- Procedures to be followed in notifying a pollution incident and actions to be taken immediately after a pollution incident;
- The PIRMP must be kept at the premises to which the relevant EPL relates and be available on the website; and
- The PIRMP should be tested.

1.4 AIMS OF THE PLAN

The aims of this plan are to:

- Provide a clear understanding of how to handle and react to any emergency and pollution incidents that may occur at the site or during the transport of waste in the form of effective control structures, procedures and directives;
- Prevent or minimise the impact of an emergency on human life, the community and surrounding environment; and Facilitate a return to normal or safe operations as soon as possible.

The procedures contained in this plan have been designed to protect life and where possible prevent or minimise damage to the equipment, site and installations at the site. The procedures also aim to facilitate a return to

normal operations by providing effective utilisation of the safety features, systems and equipment installed at the site to protect people from fire, pollution incidents and other emergencies.

1.5 SCOPE AND OBJECTIVES

This plan applies to all equipment, personnel and visitors under the control or management of SHRED-X PTY LTD whilst working or visiting the site.

The plan contains information and instructions that provide a basis for handling various types of emergency situations, such as a fire, medical emergency and spills.

These instructions should not be regarded as rigid procedures to be followed, but rather as continually improving guidelines to be adapted to cope with unanticipated situations.

The objectives of this plan are:

- To protect human life and facilitate the rescue or evacuation of personnel affected by the emergency situation;
- To control or limit any effect that an emergency situation may have on the site, neighbouring areas or on the community in the vicinity of the location of the emergency;
- To facilitate emergency response and to provide such assistance as is appropriate to the occasion;
- To ensure the quick and effective communication of all vital information to respective authorities;
- To facilitate the organisation and reconstruction activities so that normal operations can be resumed as soon as possible;
- To provide for emergency response training so that a high level of preparedness can be maintained at the facility;
- To provide the structure under which emergency procedures are revised and updated;
- To ensure timely and comprehensive communication of a pollution incident to staff, relevant authorities and all other stakeholders affected by the impacts of the pollution incident; and
- To identify risks and develop actions to minimise and manage these risks.

2. SUMMARY OF OPERATIONS, HAZARDS, AND SAFETY SYSTEMS



2.1 SUMMARY OF FACILITY OPERATIONS

Figure 2-Site plan

The existing building has an industrial gross floor area (GFA) of approximately 3834.6m², ground floor office GFA of 161m², first floor office GFA of 206.4m² and upper mezzanine office GFA of 92m².

The site has one entrance and exit driveway from Davis Road. The site consists of an industrial warehouse; concrete driveways and open areas (refer to Figure 2). The adjoining land consists of industrial facilities.

Shred-X is a secure document destruction company that collects paper & cardboard from various commercial and government clients across Metropolitan Sydney and the state. Upon arrival at the facility, the documents are sorted and shredded and then compressed into bales for recycling purposes elsewhere. The shredded document material is transported to recycling facilities within Australia, predominantly Melbourne and some is exported. Shred-X offers secure destruction of electronic data devices and repurposing of electronic assets. The data destruction services can be undertaken on a mobile basis or plant based. The majority is plant based. The e-waste

component of the business involves dismantling & separation for commodity recycling along with data sanitising and remarketing of the assets. Following data destruction, the material is sent to other recycling businesses for recycling.

Document Destruction Process:

- The facility receives and collects documents for secure destructions in bins of varying sizes (120L, 240L, 660L), in palletised form and in loose using compactor trucks.
- All the documents go through sorting to remove any contaminants, such as cardboard, plastics.
- Once sorted, the documents are shredded through paper shredder and baled into approximately 900 kg bales using an automatic baler.
- The bales are then sent off site to local and overseas paper mills.
- Cardboard and plastic collected from the sorting process are recycled separately.

Electronic Waste / Data Destruction Process:

- The facility receives electronic waste in bins and pallets, similar to the receival mechanism for document shredding. The electronic waste is sorted to separate all recyclable components and to segregate the material to be processed i.e. hard drives, sold state drives etc.
- Storage devices are mechanically shredded using a specialised shredder and sent off-site to a contractor for recycling. All the other components are sent to the electronic waste recycler to be recycled or re-used. Other than mechanical shredding, there are no other forms of processing / destroying such as thermal incineration.

2.2 SUMMARY OF TRANSPORT OPERATIONS

Collection of wastes for secure destruction from clients around the Sydney and NSW regional areas, and then the transport of these items to the site. Shred-X collect all materials using light and medium rigid sized trucks. A total of 18 trucks deliver material to the facility. The majority of trucks visit the facility on a daily basis however some trucks deliver every 2-3 days dependent on volume and location. Following secure destruction of materials, the shredded and baled loads are dispatched to recyclers for pulping and recycling in either semi-trailer or B-double trucks. Approximately 6-7 semi-trailer or B double truck movements occur per week

2.3 SUMMARY OF HAZARDS

The storing and handling of quantities of waste on-site occurs as part of day-to-day operations. The main hazards are spillage and fire. A spillage may occur during unloading and handling. A fire may occur in the facility with the potential principal causes being:

- The potential for unknown substances within the collected material to go through the shredding process and a spark causes an explosion or fire;
- Use of non-approved electrical devices

Safeguards are in place to reduce the risk of a fire.

2.3.1 Dangerous Goods

Classes of dangerous goods stored and handled at the Site			
Class Description Quantity stored Major Hazards			
2.1 Flammable Ga		> 150kg	Flash fire
	Flammable Gas		Unconfined vapour cloud explosion
			Toxicity (under extreme concentrations)
3 Flammable Liquic		> 40L	Flash fire
	Clausers bladieu id		Unconfined vapour cloud explosion
	Flammable Liquid		Potential toxic fumes (in the event of fire)
			Potential water contamination
6.1	Toxic solid (Return	× 10T	Poisonous to humans or animals
	pharmaceuticals)	> 101	Potential land and water contamination

2.3.2 Special Waste

Return Pharmaceuticals (Return Unwanted Medicines)

Shred-X also provide secure transport and storage. The facility receives pallets of return pharmaceutical (excludes cytotoxic drugs) products from wholesale pharmacy depot around NSW for temporary secure storage for RUM project. Return Unwanted Medicines is a national not-for- profit company funded by the Commonwealth Government through the Department of Health to address the Quality Use of Medicines (QUM) in Australia. Once full semitrailer load (9T) pallets are collected the pallets are sent for disposal by EPA approved transport to offsite incineration facility to dispose of by high-temperature incineration which is in accordance with regulatory and EPA requirements. The locations of RUM pallets storage areas (refer figure 2) on site are provided.

Exposure can occur through skin absorption, skin contact, ingestion and, inhalation of drug particles.

Initial Emergency Response Guide of substance stored at the site is kept at locations that are accessible to where pallets are stored.

2.3.3 Process Related Hazards

Operations include the loading, unloading and storage of recycle paper and cardboard and storage of toxic wastes. The major operational related hazards associated with the site activities include:

- Damage to a waste bin during unloading from transport vehicle, causing a spill of a waste product;
- A pallet/bin collapses as a result of an unstable storage arrangement, causing possible injury to an employee and/or damage to bins;
- Injury to employees as a result of contact with a waste product
- Release of vapours (toxic or flammable) during handling or as a result of a spill;
- A waste spill travels down a stormwater drain potentially causing environmental harm and/or human injury (off-site) due to direct or indirect contact with the substance;
- Fire caused by ignition of an unwanted substance such as flammable liquid or flammable gas most likely within the shredder; and
- Fire or explosion due to the storage of incompatible wastes or dangerous goods that are inadvertently brought onto site.

2.3.4 Potential Pollutants Stored on Site

Table 2-3: Potential Pollutants			
Pollutant Name	Storage location details	Maximum Quantity	
Oils and chemicals for plant and machineries	Stored in bunded area	500L	
Returned pharmaceutical drugs	Stored within RUM bins and palletised in the facility	9T	
Recycle paper and cardboard	Stored within bales in the facility	200T	
E-waste	Stored within bins, pallets, ULD in the facility	50T	

2.3.5 Risk Assessment

Risk can be evaluated using the template shown in Figure 2-2 as follows

• References: Safe Work Australia (2011) - Code of Practice: How to Manage Work Health and Safety Risks, AS/NZS 31000 -2009 Risk Management Principles and Guidelines.

Figure 2-2: Risk Assessment Template

Step 3: Determine the risk score						
Likelihood	Insignificant		Minor	Moderate	Major	Catastrophic
Almost certain	3 High		3 High	4 Acute	4 Acute	4 Acute
Likely	2 Modera	ite	3 High	3 High	4 Acute	4 Acute
Possible	1 Low		2 Moderate	3 High	4 Acute	4 Acute
Unlikely	1 Low		1 Low	2 Moderate	3 High	4 Acute
Rare	1 Low		1 Low	2 Moderate	3 High	3 High
Step 4: Record risk score on worksheet (Note – Risk scores have no absolute value and should only be used for comparison and to engender discussion.)						
4 A: Acı	A: Acute DO NOT PROCEED. Requires immediate attention. Introduce further high-level controls to lower the risk level. Re-assess before proceeding.			n. Introduce Re-assess before		
3 H: High Review before commencing work. Introduce new controls and, maintain high-level controls to lower the risk level. Monitor frequently to ensure control measures are working.			v controls and/or I. Monitor Ig.			
2 M: Moderate Ma rev pro		Mai revie proc	Maintain control measures. Proceed with work. Monitor and review regularly, and if any equipment/people/materials/work processes or procedures change.			
1 L: Low Reco any char		ecord and monitor. Proceed with work. Review regularly, and if ny equipment/people/materials/work processes or procedures nange.				

2.4 SUMMARY OF QHSE SYSTEMS

A number of important safety features have been incorporated into the design and operation of the Site to reduce the potential for hazardous events as outlined above to occur, or to minimise their impacts in terms of potential effects on human life and the surrounding environment. Shred- X have Quality, Environmental and Occupational Health & Safety Management system in place.

ISO 9001 Quality management system

ISO 14001 Environment management system

ISO 45001 OH &S management System

ISO 27001 Information security management system

2.4.1 Fire Services

The fire services available at the site are:

- CO2 Fire Extinguisher
- A: B(E) Powder Fire Extinguishers
- Fire hoses connected to hydrant water mains
- Fire Alarm
- Sprinkler system

Services are inspected according to code of practice.

Emergency Response Personnel can be quickly contacted via the following communication methods:

- Using internal telephone system; and
- Mobile phones (if the person to be contacted is known to be outside the site).

2.4.2 Spill Control Equipment

In addition to the bunding and storm water isolation valve, SHRED-X PTY LTD maintain the following waste spill kit items on site.

- 120L spill kits bins throughout site and Special absorbent material bags for spill control
- Broom, a pan and scraper, mop and mop bucket;
- A large reusable plastic container or bucket with fitted lid;
- Waste bags for the disposal of spill material
- Rubber gloves suitable for cleaning;
- Detergent, sponges / disposable cloths;
- Personal protective equipment including eye protection, an apron or long sleeve impervious gown, a face mask, heavy-duty gloves;
- Incident report form;

2.4.4 Other

Personal Protective Equipment (PPE) available to employees includes:

- Safety footwear, headwear, and hi-viz clothing;
- Eye Protection and ear protection;
- Various gloves.

A Safety Data Sheet (SDS) register is located in the facility at the chemical cabinets.

Waste management plan is in place to segregate and disposal of material received and generated on site.

3. TYPES OF EMERGENCIES

The following types of emergencies covered by this plan are summarised in Table 3-1 below.

Table 3-1: Types of emergencies			
Emergency Event	Emergency Type	Emergency Response Procedure	
	Fire within property		
Fire/Explosion Fire/Explosion; Gas Release Fire within shredder / waste bin Fire/Explosion; Gas Release		Fire/Explosion; Gas Release	
	Spills during material handling operations or transport		
Spills	Collision of road vehicles	Dangerous Goods Emergency; Spill Control and Containment	
	Bin damaged by forklift		
	Overflow causing release of contaminated waste		
	Bin containing waste overturns during unloading, spilling contents		
Personal Injury	Work accident, such as heart attack, serious fall, severe injury or contact with chemical	Medical Emergency	
Miscellaneous	Site Evacuation	Evacuation.	

4. EMERGENCY CONTROL AND RESPONSE

The normal hours of operation of the Site are between 5.00am to 6.00pm Monday to Saturday.

4.1 PRINCIPLES OF EMERGENCY CONTROL AND RESPONSE

The principles of emergency response will be based on Prevention, Containment, Rescue and First aid. These have been summarised below:

Table 4-1: Emergency response principles			
.	Inspection of all Site and dangerous goods storage facilities.		
Prevention	Regular emergency response drills to ensure site readiness.		
	Minimise any secondary damage.		
Containment	Immediate isolation of all electrical power to the affected area.		
	Strict co-operation with any instructions provided by the Chief Warden.		
Rescue	Only trained emergency personnel are to use emergency equipment where an emergency situation requires particular precautions (i.e., Spill Kits, Fire Fighting Equipment) or the use of specialised Personal Protection Equipment (PPE). Approved safety clothing to be worn. All emergency equipment would be located in relative areas of concern. Emergency equipment operations must never endanger the safety of personnel.		
First Aid	First-aid officer to provide assistance.		

4.2 EMERGENCY CONTROL ORGANISATION

The Emergency Control Organisation (figure 4-1) consists of a group of Site personnel who have the responsibility of providing first response actions in an emergency.

The Emergency Control Organisation tasks involve organising the necessary resources, communications, evacuation of personnel and implementing corrective actions that may be necessary to return the emergency situation back to normal.



Shred-X - Emergency Control Organisation (ECO)

All Emergency Control Organisation members clearly understand that they provide the first line of attack in an emergency situation, such as a fire.

4.3 PRINCIPLE ROLES AND RESPONSIBILITIES

The Chief Warden is in charge of overseeing and controlling all emergency response actions at the Site. In the case that the Chief Warden is unavailable at the time of the emergency, control will be delegated to the responsibility of the Warden.

4.3.1 Damage Control

All Emergency Control Organisation personnel shall be trained in the use of fire-fighting equipment, including the use of fire extinguishers and hose reels.

In the event of a Major Emergency, the role of the Emergency Control Organisation is to ensure that the damage or danger caused by the emergency situation is controlled or minimised until external aid arrives at the Site.

4.3.2 Rescue and First Aid

First Aid Officer/s will be required to render assistance in removing any injured personnel from the emergency area and to provide effective management of injuries until paramedics arrive on-site.

4.3.3 Communications

The Communications Officer will monitor and facilitate the effective exchange of information between the Site and the relevant State Emergency Services.

The Executive will be responsible for relaying information to the media and other public bodies. All staff will be instructed to not discuss such issues with any external bodies.

4.3.4 Evacuation

The Chief Warden will determine and control the evacuation of the Site. The Chief Warden will direct staff to evacuate the Site should the emergency grow beyond manageable proportions. To aid in the evacuation an employee checklist will be used by Chief Warden to mark names and ensure all employees working in the affected area have been safely evacuated.

4.3.5 Traffic Control

A Traffic Control Officer nominated by the Chief Warden will be responsible for ensuring the free flow of traffic around the Site. The task may also involve the removal of any vehicle that may obstruct the free flow of emergency vehicles in and out of the Site.

4.3.6 Emergency control Point

Figure- 4-2



In the event of an emergency, the Chief Warden will co-ordinate the emergency response activities from the Emergency Control Point, which is located on the grassed area at the front of the site (if appropriate to emergency)

4.3.7 Movement of Vehicles

Vehicles shall not be removed from the car park area during an emergency requiring evacuation of the premises, unless authorised by the State Emergency Services Commander. This is to avoid local traffic congestion, and to protect employees in vehicles against possible injury.

4.4 FIRE DETECTION

Site personnel are the primary mechanism by which fires are detected. Site personnel would be able to quickly detect any leaks of flammable materials, which may lead to an increased fire risk, via visual or odour recognition. Once such situations are detected appropriate first response action would be taken. Smoke detectors are fitted throughout the facility.

4.5 RAISING ALARM

When an emergency situation has been identified, the Manager shall immediately be informed. If necessary, emergency services shall be contacted by calling 000.

4.5.1 Evacuation Initiation

The Chief Warden shall assess the extent and severity of the emergency situation and issue a complete site evacuation order if considered necessary.

If it is considered safe to do so, pre-selected personnel shall remain behind to ensure that the Site is brought to a safe or stable condition before proceeding to the Emergency Assembly Area.

All other personnel shall be evacuated immediately.

Where a clear danger exists, Site personnel may evacuate on their own initiative to safe areas or the emergency assembly area.

4.5.2 Personnel Accounting System

After evacuating, personnel shall assemble at their designated Emergency Assembly Area. The Chief Warden shall then conduct an attendance roll call to ensure that all persons are accounted for including any visitors and contractors working on-site.

Any missing persons shall be advised immediately to the State Emergency Service upon arrival. The Chief Warden will assess whether or not the on-site emergency response team has the capability or necessary equipment to safely undertake the search and rescue activity of the missing person or wait until the State Emergency Service personnel arrive on-site.

4.5.3 Adjacent Premises

The occupants of adjacent premises should be advised if endangered by the emergency. However, evacuation of those areas is the responsibility of the individual companies and the Emergency Services.

4.6 NOTIFICATION OF A POLLUTION INCIDENT

A pollution incident that occurs in the course of an activity (within the facility or during the transportation of waste) so that material harm to the environment is caused or threatened must be notified.

4.6.1 Notification of a Pollution Incident at the Facility

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying licensed premises that become aware of a pollution incident are required to report it immediately.

4.6.2 How to Notify?

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service.

Then immediately contact the Chief Warden/Warden who will take over communication responsibilities.

If the incident does not present an immediate threat, or once the initial 000 call has been made, a decision on who to notify needs to be made. Where notifications are required then notify the relevant authorities in the following order:

NSW EPA – Environmental Direct Line

131 555

Fairfield City Council – (02) 9725 0126 NSW Health (Public Health) – 1300 066 055 WorkCover on 13 10 50 (WorkCover will ask for the ABN)

4.6.3 What to Notify?

Section 150 of the POEO Act specifies relevant information about a pollution incident to be given as follows: (a) the time, date, nature, duration and location of the incident, (b) the location of the place where pollution is occurring or is likely to occur,

- (c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if *known*,
- (d) the circumstances in which the incident occurred (including the cause of the incident, if known),

(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known, (f) other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

4.7 TERMINATING AN EMERGENCY

Once clearance is given by the Emergency Services that the emergency incident has been controlled, the Chief Warden will assume control of the site. In this event the following tasks shall be undertaken:

- The Chief Warden and Warden must undertake a full investigation and assessment of the area prior to allowing workers to return;
- The Chief Warden and Warden must ensure any clean up required is done so to ensure a safe work environment for all staff. In addition, ensure the safe handling, transport and storage of any waste materials is undertaken;
- All clean up material and contaminated items must be disposed of appropriately, according to the waste management procedure; and
- When the area is considered safe, workers can return to work.

4.8 WRITTEN REPORT ON EMERGENCY AND REVIEW OF EMERGENCY PLAN

After any emergency, the Branch Manager and Chief Warden shall prepare an incident report providing the following information:

- Reason and cause of incident;
- Review of the emergency response performance;
- Recommendations on preventative strategies or additional safety systems that may be considered essential to avoid a recurrence of the incident; and
- Recommendations on methods or ways to improve the emergency response performance so that any future incidents can be dealt with in a more effective manner.

In the case of pollution incident that was required to be notified under Section 148 of the POEO Act, written notification must be provided to all regulatory authorities that were notified within 7 days of the incident. Information required in the written notification is included in the site's Environment Protection Licence.

4.9 TRAINING

All personnel working at the Site shall be trained in the basic emergency response procedures. All personnel must undertake Induction Training at the commencement of their employment at the Site and be aware of standard operating procedures.

Competency would be recorded following the completion of the training program to ensure that the employee has acquired a satisfactory level of knowledge.

4.10 PREMPTIVE ACION

Above all it is pre-emptive actions that will mitigate against any risk of harm to human health or the environment include:

- Always follow the company standard operating procedures;
- Take personal responsibility for your safety and the safety of others;
- Ensure all containers and each load is secure and correctly labelled;
- Use the tailgate to load and unload vehicles;
- Ensure spill kit and fire extinguisher are available in all area and in all transport vehicles.

5. EMERGENCY SCENARIOS

In the event of an emergency the ECO officer is to contact the appropriate authorities. Below is a flow chart detailing the process taken in the event of an incident.



5.1 Hazardous Material spills or leaks

In the event a chemical or hazardous material leak or spill occurs a number of actions will be required. Emergency Procedures in this case should consider the immediate danger to persons and procedures to ensure effective containment and clean up, appropriate disposal of waste material and notification of all relevant authorities.

The ECO officer must ensure that the following are notified:

- Emergency Services '000'
- NSW State Manager
- Risk and Compliance Manager

The ECO officer will notify the following groups if the spill poses an immediate threat to personnel or the environment:

Group:	Actions required:	
NSW Fire and Rescue	Call for assistance	
	Inform the Fire Brigade of the Hazardous Substance and ensure	
	that the SDS is available to them upon their arrival on site	
Risk and Compliance	Called to emergency site.	
Manager	Conduct Investigation	
	Assess and report appropriate authorities	
	Prepare Remediation Plan	
	Implements community notification protocol	
Local Community	Place hazard signage and notify nearby residents	

Procedure:

- If substance is flammable DO NOT use mobile telephones. Turn mobile off.
- If substance is flammable DO NOT transmit on two-way radios in the affected area. May use for reception only. The use of this equipment could serve as an ignition source.
- Create bund wall around spill area ensure that no Hazardous Material is allowed to enter gutters, drains, waterways, confined spaces, excavations or trenches.
- Evacuate all personnel from confined spaces and cancel all Confined Spaces Entry Permits
- Use spill kits to contain and absorb the hazardous substance
- Ensure all personnel are wearing appropriate PPE as described in the SDS

5.2 Serious Traffic Incident

In the event of a serious traffic accident where persons may be injured should ensure that the following are notified:

- NSW Police '000'
- NSW State Manager
- Risk and Compliance Manager

The Eco officer will notify the following groups if the spill poses an immediate threat to personnel or the environment:

Group:	Actions required:
NSW Police	Call for assistance
Risk and Compliance	Called to emergency site
Manager	Conduct Investigation
	Assess and report appropriate authorities
	Prepare Remediation Plan
	Implements community notification protocol

The Driver or first response should assess any hazards as a result of accident, i.e. Fuel leaking, power lines down, gas lines ruptured etc and if any hazardous goods were being carried by vehicles involved. This information should be advised to the Emergency Services crew.

Enact appropriate Emergency Response procedures as deemed necessary as a result of the above Risk Assessment. i.e. Gas Leak, Hazardous Substance Spill etc.

5.3 Fire

In the event of a serious incident involving fire where persons may be serious risk of injury and serious damage caused to the natural environment. Shred-X should ensure that the following are notified:

- NSW Fire and Rescue '000'
- NSW State Manager
- Risk and Compliance Manager

The ECO officer will notify the following groups if the spill poses an immediate threat to personnel or the environment:

Group:	Actions required:
NSW Police, Fire and	Call for assistance
Rescue	
Shred-X Management	Called to emergency site
	Conduct Investigation
	Assess and report appropriate authorities
	Prepare Remediation Plan
	Implements community notification protocol

The first response to take themselves and others in the vicinity immediately away from the hazards. Alert any members of the public or nearby residents to the dangers. Contact emergency fire and rescue and follow their commands.

6. COMMUNITY NOTIFICATION PROTOCOL

Communicating with neighbours and the local community is an important element in managing the response following an incident.

Where community notification is required following a pollution incident involving trackable waste, this will usually be led by the incident controller from emergency services (NSW Police Force or Fire & Rescue NSW). Shred-X will consult with the incident controller on what community notification, if any, should be undertaken during and immediately following an incident.

Communication mechanisms used by Shred-X include:

- Doorknocking
- Facebook and twitter alert
- SMS messaging devices
- Emails to community representatives

Radio Communications and Mobile Telephones

Where an emergency is declared the Driver shall be responsible for implementing procedures that will coordinate all radio transmissions during the emergency.

7. REVIEW AND TESTING OF THE PLAN

This plan needs to be reviewed once per year, or otherwise:

- Within one month of any emergency pollution incident that requires notification;
- Following any significant changes to the layout or operations on site.

Review and testing of the plan need to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner (through drills).

8. APPENDIX

A – Pollution Incident Response Management Plan Key Contacts and Details

Key Details			
Name of Company	Shred-X Pty Ltd		
ABN	44123767153		
Primary Site address	29C Davis Road, Wetherill Park, NSW 2164		
Contact	1300 747 339		
Hours of Operation	7am – 5pm Mon - Sat		
Company website	www.shred-x.com.au		
details			
Company Contact	Dave Rogers, NSW State Manager		
Details	0412 582 092		
	Dave.Rogers@Shred-X.com.au		
24-hour contact	Cecily Shirley, Branch Manager		
details	0409123302		
	Cecily.Shirley@shred-x.com.au		
Person responsible	Dave Rogers, NSW State Manager		
for the	0412 582 092		
implementation of	Dave.Rogers@Shred-X.com.au		
the Plan			
Person responsible	Dave Rogers, NSW State Manager		
for notifying relevant	0412 582 092		
authorities	Dave.Rogers@Shred-X.com.au		
Testing			
Date of Review:	21 April 2020 Next Review Date: 21 April 2021		
Date Plan was last			
tested:			
Method of Test	Desktop simulation, practice exercises, and drills		
Notification to Relevan	1t Authorities		
NSW WINISTRY OF	9391 9000		
Health (Local Public			
Circ and Passue NSW	000		
Polico			
EPA INSW Sofo Work NSW	131 355		
Local Government	Fairfield City Council		
Local Government	Pairileid City Council 86 Avoca Road, Wakelov		
Nearest Hospital	oo Avoca Koad, Wakeley		
ινεαιεςι ποςμιται	18 Blacktown Rd. Blacktown NSW 2148		
	02 9881 8000		

B – Incident Reporting Procedure

SX National Policies

SXNATQPO023 Shred-X WHS Incident Reporting Policy



POLICY STATEMENT

As part of our commitment to achieving the principles of health and safety in our workplace, we recognise our moral and legal responsibility to provide a safe and healthy work environment for workers, contractors, customers and visitors. In order to achieve this, we require that all incidents, work-related injuries and illnesses, and near-miss events are reported immediately in order to allow actions to be taken to prevent a recurrence.

AIMS AND OBJECTIVES

We will implement incident reporting and investigation procedures in order to ensure that all incidents (or near misses) are reported as soon as practicable following the incident, and that details of all incidents (including investigations) are accurately and comprehensively recorded.

RESPONSIBILITIES

Management and supervisors will ensure that -

- · All incidents (including near-misses) are recorded promptly when reported or discovered
- · All work-related injuries (including first aid) and illnesses are recorded when reported
- · Investigations of all incidents, injuries, illnesses and near-misses are carried out to determine causative factors.

Workers are required to -

- Report any notifiable incident to their supervisor or management immediately or as soon as possible following the incident
 Report all incidents (including near misses), work related injuries and illnesses (including first aid injuries) as soon as practicable following the event
- Co-operate with management and supervisors in the recording and investigation of incidents · Not interfere with the site of an incident unless permitted to by management, unless it is necessary to do so to prevent further injury
- or damage, or to relieve suffering or rescue trapped persons.

All personnel are required to assist an inspector or police officer who is investigating any incident, and to answer all questions asked of them fully.

This policy is reviewed and updated on annual basis by the Management Review Team.

Signed by: Van Karas General Manager

Uncontrolled when printed

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