Pollution Incident Response Management Plan

KLF Recycling Hornsby Pty Ltd

7-9 Brennan Close, Asquith

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
LICENCE NUMBER: EPL 20582

Approved by: Harry Scarlis
Position/Title: Director

Signature: Harry Scarlis
Date: 5 May 2025

PURPOSE:

KLF Holdings Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 16 Grand Avenue, Camellia. As per 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.

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

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

Environment Protection Licence (EPL) Details	
Name of licensee: (including ABN)	KLF Recycling Hornsby Pty Ltd ABN 27 159 956 359
EPL number:	20582
Premises name and address:	7-9 Brennan Close, Asquith
Company or business contact details	**Name: Harry Scarlis** **Position or title:** Director **Business hours contact number/s: 02 9482 1177** **After hours contact number/s:** 02 9482 1177 **Email:** hornsby@klfholdings.com.au
Website address:	www.klfholdings.com.au
Scheduled activity/activities on EPL:	Waste storage
Fee-based activity/activities on EPL:	Waste storage - other types of waste

Pollution incident – person/s responsible	
PIRMP activation	**Name of person responsible:** Anthony Crick **Position or title:** Site Manager **Business hours contact number/s:** 02 9482 1177 **After hours contact number/s:** 02 9482 1177 **Email:** hornsby@klfholdings.com.au

Pollution incident – person/s responsible, continued

Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	**Name of person responsible:** Harry Scarlis **Position or title:** Director **Business hours contact number/s:** 02 9482 1177 **After hours contact number/s:** 02 9482 1177 **Email:** hornsby@klfholdings.com.au
Managing response to pollution incident	**Name of person responsible:** Andrew Davies **Position or title:** WHSEQ Manager **Business hours contact number/s:** 02 9482 1177 **After hours contact number/s:** 02 9482 1177 **Email:** andrew@klfholdings.com.au

Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Relevant authorities include:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
2. EPA – 131 555
3. NSW Health (nearest public health unit)

See www.health.nsw.gov.au/Infectious/Pages/phus.aspx for local contact details.

4. SafeWork NSW – 131 050
5. Local authority (usually the local council) in which the pollution has occurred.

Note: The local council and public health unit will vary depending on the location of the pollution incident. For mobile plant licences the PIRMP will need to include the person or people who are responsible for identifying the local authority and nearest public health unit.

Fire & Rescue NSW / Rural Fire Service	**Contact number/s:**	000 / 02 9265 2999
EPA	**Contact number/s:**	131 555

NSW Health	**Relevant Area Health Service:** **Contact number/s:**	Parramatta PHU 02 9840 3603
SafeWork NSW	**Contact number/s:**	131 050

Notification of relevant authorities, continued

Local authority/s Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area, is affected, or potentially affected, by the pollution.	**Contact number/s:**	Hornsby Shire Council 02 9847 6666
Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Planning Industry and Environment, Roads and Maritime Services	**Contact number/s:**	Water NSW 1300 662 077 RMS 13 77 88

Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

- Reece Plumbing
- Sublime Body Works
- Clarke Automotive
- Funtastic Kids
- CrossFit Feel Good
- Family Affair Catering
- TGM Panel Beating & Spray Painting

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):

Neighbours to be identified by phone call to the following contact numbers:

- Reece Plumbing – 02 9472 5310
- Sublime Body Works – 0416 026 060

- Clarke Automotive – 02 9476 5800
- Funtastic Kids – 02 8376 4376
- CrossFit Feel Good – 0422 677 595
- Family Affair Catering – 02 9476 1255
- TGM Panel Beating & Spray Painting – 02 9987 4969
- Water NSW – 1300 662 077

Description and likelihood of hazards

The following risk matrix is to be applied when considering the types and likelihood of hazards:

Likelihood	RISK SCORE CALCULATOR	Consequence				
		Significant	Major	Moderate	Minor	Insignificant
	Very Likely	1	1	1	2	2
	Likely	1	1	2	2	2
	Possible	1	2	2	2	3
	Remotely Possible	2	2	2	3	3
	Very Unlikely	2	2	3	3	3

Consequence / Impact	Description of Consequence / Impact	Risk Class
	Potential Death, Permanent Disability, or Major Structural Damage. Off-site release not contained, major remediation required with outside assistance, significant detrimental environmental impact.	1
	Potential temporary disability/ serious injury or Minor Structural Damage. On site release contained, minor remediation required with outside assistance; short-term detrimental environmental impacts.	2
	Potential incident that may cause persons to require first aid. On-site release immediately contained; minor level clean up with no short-term environmental impacts.	3

Item	Description	Likelihood / Consequence / Risk Class	Contributing Circumstances
1	Liquid Spill: This could include:	2 / 3 / 3	Contributing circumstances could include: - Self-bunded diesel tank being compromised; - Incorrect storage of oils onsite;

	- Diesel spill from the onsite diesel tank, the diesel tanks on mobile plant and equipment or diesel tanks from vehicles delivering waste; - Liquid/oil spill from stored machine/hydraulic oils onsite; - Liquid potentially contained in waste received onsite. The premises is located adjacent to the Hornsby Creek. Any potential spills would need to be immediately and effectively contained on the premises to avoid contamination.		- Incorrectly accepting waste that contains liquids; and - Piercing diesel tanks on mobile plant and equipment.
2	Stormwater Pollution: There is potential for stormwater runoff to be sediment laden and pollute surrounding stormwater systems. The premises captures all stormwater onsite and recycles the water rendering this risk quite low.	3 / 3 / 3	Contributing circumstances could include storage tanks onsite not having enough capacity. This would only conceivably be problematic in a 1 in 100 year storm/rain event.
3	Storage Tank Integrity: There are two above ground water storage tanks onsite used for the purpose of storing recycled water. There is potential for the integrity of the tanks to be compromised leading to spills. This could potentially spill offsite if the volume of water was large enough.	2 / 3 / 2	Contributing circumstances could include: - The age of the tanks (ie wear and tear over time); and - Compromised integrity could result from being impacted by machines/vehicles.
4	Asbestos Contamination: Despite not accepting asbestos, there is the potential for inadvertent asbestos contamination of waste stockpiles onsite. This would be the result of asbestos being contained in the incoming waste received onsite.	2 / 1 / 2	Contributing circumstances could include: - Asbestos being intentionally hidden in the incoming waste stream; and - Complacency with respect to load inspection procedures.
5	Fire:	3 / 1 / 2	Contributing circumstances could include:

	Waste stockpiled onsite is dry inert waste which includes materials such as timber, cardboard and plastics. These materials are potentially combustible. If a fire were to start onsite, there is potential for stockpiles to burn, fire to travel off the premises, as well as the resultant water pollution issues resulting from water used to extinguish the fire.		- Stockpiles of different waste types not being appropriately separated; - Heat/dry weather conditions; and - High winds.
6	Dust Pollution: There is the potential for dust to be generated from onsite activities and the potential for this dust to migrate offsite. These activities include receiving, storing and processing waste as well as dust generated from vehicles moving along sealed surfaces.	3 / 2 / 2	Contributing circumstances could include: - Heat/dry weather conditions; - High winds; and - Complacency with respect to adhering to the onsite dust management protocols.
7	Windblown waste: There is potential for lighter waste materials to be blown offsite during high winds. These could include plastics, cardboard and paper. This could occur during loading/unloading of waste.	3 / 3 / 3	Contributing circumstances could include: - High winds; - Incorrect loading/unloading procedures; and - Incorrect storage/stockpiling of waste (all waste is to be stored in onsite shed).

Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

Item	Description	Pre-emptive Actions
1	Liquid Spill	- Ensure diesel tank self-bunding integrity is not compromised via regular inspection and assessment; - Ensure oils are correctly and safely stored onsite, as well as ensuring those oils are used safely and responsibly; - Ensure detailed inspection of incoming waste to ensure no liquid is contained in the loads; - Mobile plant and equipment to be regularly serviced in accordance with the manufacturer's recommendations in order to minimise the likelihood of oil/diesel leaks and spills; - Ensure employees are trained and monitored when re-fuelling machines and filling up machine oils; and - In the case of a spill, ensure spill kits are always available onsite and ensure their whereabouts is known to allow for immediate deployment if needed.
2	Stormwater Pollution	- Ensure storage tank integrity is not compromised via regular inspection and assessment.
3	Storage Tank Integrity	- Ensure storage tank integrity is not compromised via regular inspection and assessment; and - Place aboveground tanks in areas where there is little likelihood of them being impacted by machinery and/or other vehicles.
4	Asbestos Contamination	- Ensure the premises Asbestos Management Plan is strictly adhered to; - Provide regular training for staff in respect of asbestos management/risks; - Ensure appropriate PPE is worn at all times, particularly when staff are dealing with asbestos detection and/or rejecting and/or reloading incoming waste; and - When in doubt as to whether a piece of material or incoming waste contains asbestos, treat is as though it does.
5	Fire	- Ensure waste is stored appropriately at all times; - Ensure onsite hoses are in good working condition; - Ensure onsite fire extinguishers are tested and in correct working order; - Undertake regular fire drills; - Ensure there is no risk of water run-off where large volumes of water are used to extinguish a fire; - Ensure emergency services vehicles would have clear passage to the site at all times if needed; and

		- Exercise additional precautions taken/awareness during hot/dry/windy weather conditions.
6	Dust Pollution	- Ensure strict adherence to the onsite Dust Management Plan; - Ensure boundary fencing and shade cloth integrity is not compromised to assist in containing any dust generated onsite; - Ensure all waste is kept inside the onsite storage shed; - Implement the use of onsite handheld hoses and fixed misting sprays appropriately and as needed; and - Exercise additional precautions taken/awareness during hot/dry/windy weather conditions. This can include slowing/minimising/stopping certain onsite processes as appropriate.
7	Windblown waste	- Ensure boundary fencing and shade cloth integrity is not compromised to assist in containing any windblown waste onsite; - Ensure loading/unloading procedures are carried out correctly and in accordance with onsite processes and instructions from management staff; - Ensure waste onsite is stored and stockpiled correctly (inside the shed); and - Exercise additional precautions taken/awareness during windy weather conditions. This can include slowing/minimising/stopping certain onsite processes as appropriate.

Inventory of pollutants

Item	Description	Location	Maximum Storage Capacity
1	Diesel	Self-bunded tank along the north-western site boundary.	2,000 L
2	Recycled Water Storage	Storage tanks in the south-eastern corner of the site.	27,000 L
3	Grease	Workshop inside building.	25 kg
4	Degreaser	Workshop inside building.	25 L
5	Engine Oil	Workshop inside building.	160 L
6	Hydraulic Oil	Workshop inside building.	160 L
7	Coolant	Workshop inside building.	50 L

	8	Anti-bacterial soap	Staff amenities inside building.	25 L

Safety equipment

Onsite safety equipment includes:

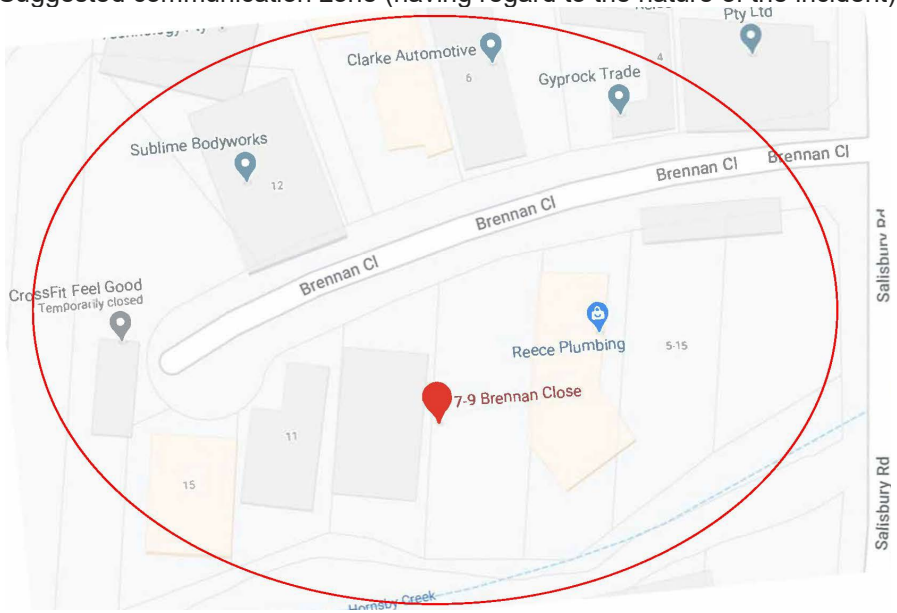
- Protective gloves;
- Protective face masks;
- Hard hats;
- First aid kits including eye wash;
- Fire extinguishers;
- Spill kit;
- Safety inspections checklists for mobile plant and equipment; and
- Diesel tank dip to monitor capacity.

Communicating with neighbours and the local community

Neighbours and local community (details above) are to be immediately notified of a pollution incident. Particularly the following should be considered and implemented as appropriate:

- Communication should be made to all relevant stakeholders and neighbours having regard to the following:
    - The nature of the incident (ie spill, dust etc) and possible effects this will have on the surrounding environment and people;
    - Type of communication (ie phone, letter drop, SMS etc);
    - Contact details should be left with relevant stakeholders and neighbours so that they can contact KLF at any time to discuss the matter;
    - Instructions and suggestions can be provided in order to inform neighbours what they can do to minimise any harm to people or environment (as applicable and as appropriate);
    - Response by KLF (including clean up phases/strategy, changes to be made to prevent incident from re-occurring);
    - Ongoing communication as appropriate to update stakeholders/neighbours on the status of the rectification; and
    - Final communication once clean-up/rectification is complete.

- Suggested communication zone (having regard to the nature of the incident):



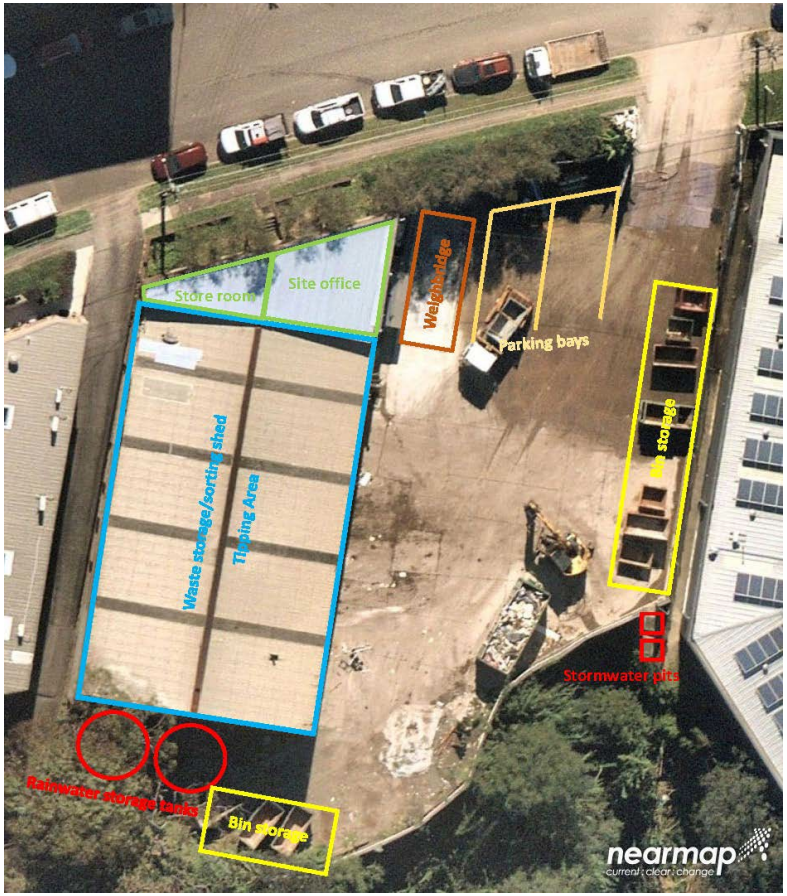
Minimising harm to persons on the premises

Should an incident occur onsite, the following actions and arrangements are to be in place to minimise the risk of harm to people onsite:

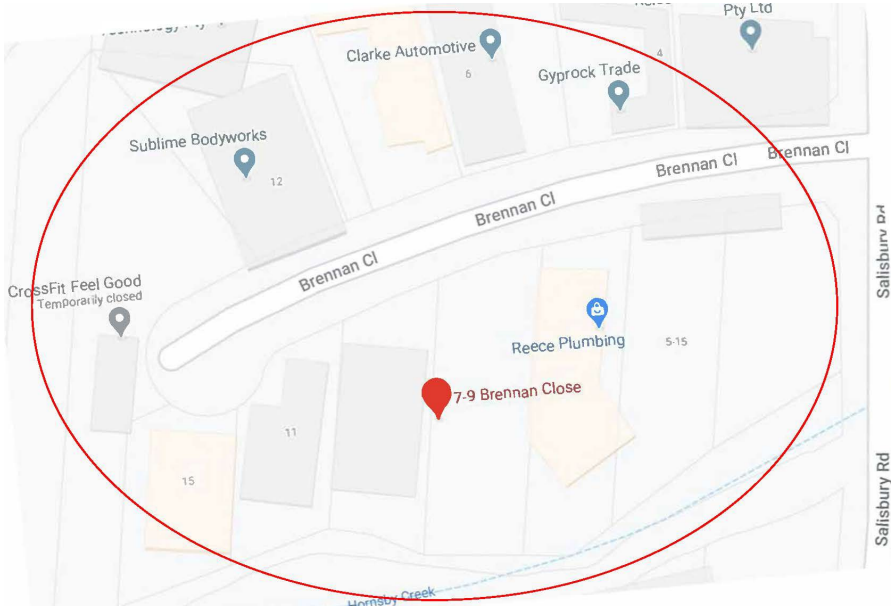
- PPE (gloves, masks, hardhats etc) are always to be provided to all staff working onsite. This will particularly assist in instances of dust or asbestos related incidents;
- Assembly area is directly outside the site office/car park area (see map below). This is to be used in the case of evacuation due to fire or any other incident that warrants an evacuation/assembly;
- Evacuations are to be implemented as appropriate in the case of a fire. In the instance of other incidents (ie spills), personnel onsite are to assist in the clean-up at the direction of management; and
- All people onsite are to follow the instructions of management personnel.

Maps

Premises Map:



Surrounding Area:



Actions to be taken during or immediately after a pollution incident

The following actions are to be taken immediately after a pollution incident:

1. Pollution containment:

   This is a priority. Having regard to the type of incident, onsite staff should act quickly to contain the pollution as best as possible. This could include utilisation of spill kit equipment, immediately shutting down processing plant, ceasing operations, use of firefight equipment etc.
2. Determine the scale of the pollution incident:

   Assess the incident and determine the scale of the pollution incident.
3. Implement the relevant communication protocol:

   If appropriate, communication with emergency services should be a priority (ie in the case of fire). Following this, further communication should be made with neighbours and the local community (as outlined above).
4. Minimise harm to human health:

   Minimising immediate harm to human health should be considered both during and immediately following a pollution incident (ie evacuation in the case of a fire). It may be necessary to implement the relevant processes here before communication to neighbours and the local community (if there is imminent threat to human health).

Having regard to the type of pollution incident, reducing and minimising harm to human health can be achieved by implementing the following steps (as appropriate):

1. Early warnings to the neighbours and local community;
2. Provide detailed information as to how the risk to human health can be minimised (ie recommending appropriate precautions to be taken);
3. Providing regular updates of the containment and clean-up processes;
4. Notifying neighbours and the local community once the clean-up process is complete and there is no longer any risk to human health.

Having regard to the type of pollution incident, the following steps are to be undertaken in order to carry out the clean-up:

1. Assess the pollution incident (ie type, extent etc);
2. Implement relevant clean up procedures where applicable. This could include contacting emergency services, engaging the appropriate contractors or the use of specific clean-up equipment like a spill kit. The processes will vary depending on the type of incident.

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3. Following completion of the clean-up, engage a suitably qualified contractor (eg occupational hygienist) to assess the situation and provide a determination/assessment on the effectiveness and completeness of the clean-up, as well as providing any relevant instructions for further works that might need to be carried out.

Funding the clean-up process is to be provided using any contingency funds available or (where possible) drawing on any available debt facilities.

Coordinating with persons

Throughout the process of activating this PIRMP, identifying and implementing the relevant clean-up processes and confirming that the relevant clean-up process is satisfactorily complete, the following people and authorities are to be communicated and co-ordinated with (as applicable having regard to the pollution incident):

1. NSW EPA;
2. Fire & Rescue NSW;
3. NSW Health;
4. SafeWork NSW; and
5. Neighbours and the local community.

These communications are to be made through the responsible persons listed in this PIRMP, as well as any management staff member tasked with the responsibility of carrying out the clean-up process.

Staff training

Onsite staff are to be trained on the content and detail of this PIRMP. Particularly, training is to be carried out so that the relevant staff members are competent in:

1. Knowing when to activate this PIRMP including likelihood of its activation; and
2. The appropriate steps to be taken to implement this PIRMP as outlined above.

Training is to be carried out as needed to keep staff up to date (including training new staff), but no less than once every 12 months. Training is to take the form of:

1. Toolbox talks;
2. Formal training (as required); and
3. Desktop scenario exercises.

Testing and updating of the PIRMP

PIRMP testing details

PIRMP is to be tested at least once every 12 months, or within 1 month of a pollution incident occurring. Details are to be completed below:

Date tested	**Tested by** **(to include the names of all people involved in testing)**	**Details of test** **(e.g. nature of the test, involvement of other agencies)** **Note: Testing must cover all components of the plan.**	**Finding of test, including issues identified**	**Next scheduled testing date** **(must be within 12 months from current test)**
2 May 2025	Harry Scarlis Anthony Crick Andrew Davies	Desktop test of PIRMP performed, including review of contents of the PIRMP.	PIRMP (with updates included in this revision) is satisfactory.	On or before 5 May 2026.

PIRMP update details

PIRMP is to be reviewed at least once every 12 months and the review must have regard to such things as changes to onsite processes (including processing capacity), changes to site layout/storage, any changes to the surrounding area/environment or changes to contact details/persons responsible under this PIRMP. Any such changes should be considered in the context of whether there would be any change to risks/effects of a pollution incident.

Details of changes are to be recorded below and updated as a new version in the body of this PIRMP.

Date update occurred	Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion