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POLLUTION INCIDENT RESPONSE PLAN

ORGANICS PROCESSING FACILITY

298 Bartletts Road, Stotts Creek NSW 2487

Version 1, June 2021

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1. Pollution Incident Response Plan

A Pollution Incident Response Plan (PIRP) has been developed to describe SOILCO's response to a potential pollution incident and to meet the requirements of the Protection of the Environment Operations Act (POEO Act 1997). This plan identifies the potential hazards and actions to be taken to prevent environmental harm, detailing any communication required in the event of an incident.

1.1 Pollution Incident Procedure

A pollution incident is required to be notified if there is a risk of **'material harm to the environment'**.

Material harm is defined in s.147 of the POEO Act 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.


It is necessary to follow the procedures in notifying a pollution incident to premises in the vicinity and to relevant authorities so that communication with all necessary parties occurs in a timely manner to minimise the impact of the pollution incident on the environment and human health.

- a) Step 1: Emergency Response: Ensure personnel are safe.
- b) Step 2: Emergency Response: Is evacuation required?
- c) Step 3: Notify Management
- d) Step 4: Management to notify external parties without delay where there is a risk of 'material harm to the environment'.

The attached flow chart details the steps above, ensuring in the event of a pollution incident the following stakeholders are notified:

- a) Owners and Occupiers of Premise
- b) Local Authority
- c) Any area affected or potentially affected by the pollution
- d) Any other persons or authorities to be notified.

The flow chart also provides the details of key individuals who are responsible for managing pollution incidents. This includes key individuals responsible for activating the plans, notifying the relevant authorities and individuals who have responsibilities for managing the response to a pollution incident. Also included are the contact details for the appropriate regulatory authorities.

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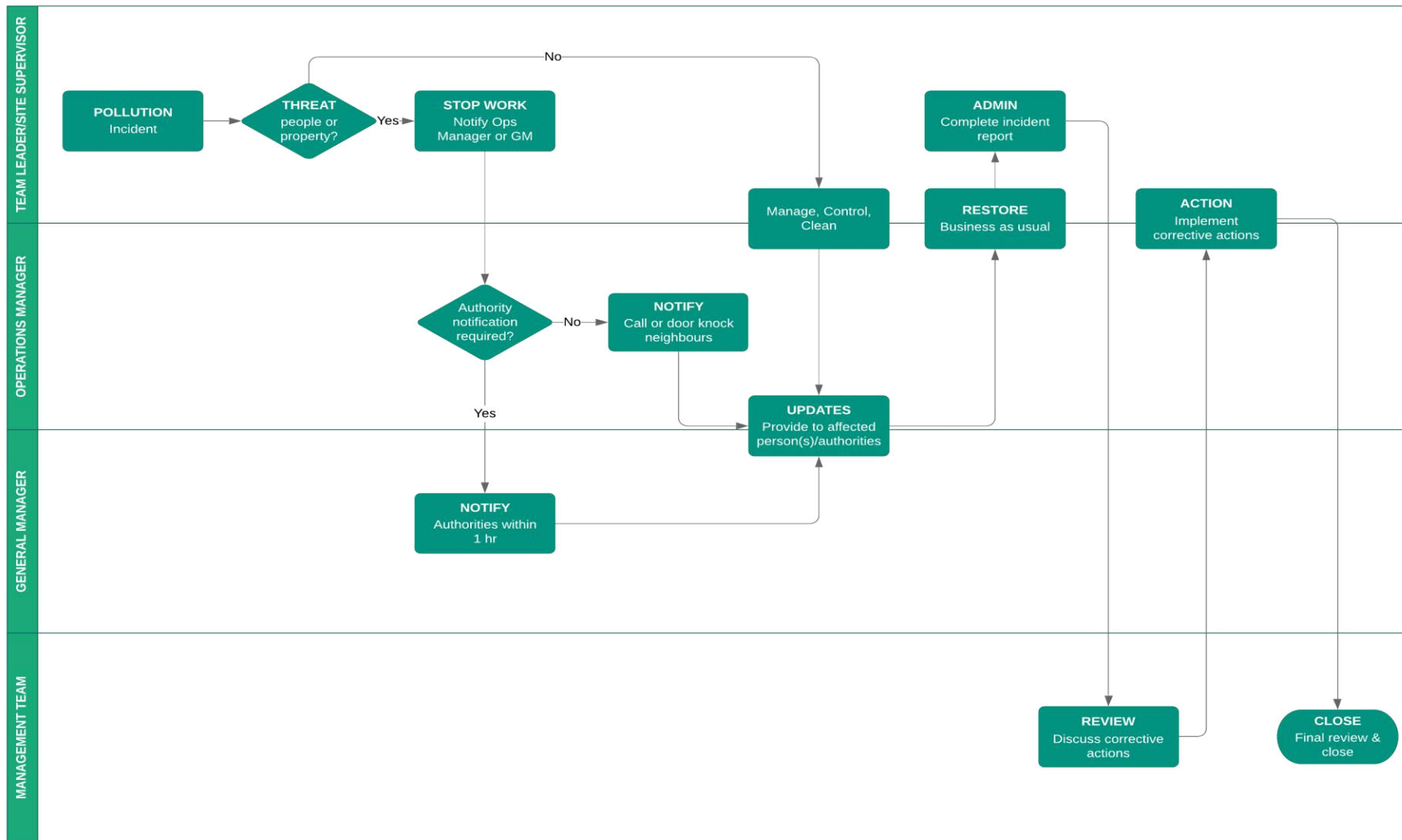


Figure 1: Pollution Incident Reporting Flow Chart

1.2 Description of Hazards

Potential pollution incidents identified for the OPF include:

- Air Pollution Incident: Escape of significant dust or smoke to atmosphere.
- Water Pollution Incident: Escape of significant sediment, leachate, or fuel off site to water.
- Land Pollution Incident: Escape of significant sediment, leachate, or fuel off site to land.

Noise only pollution is not included as a notifiable incident.

1.3 Notification of Internal Parties

Team Leader/Site Supervisor

- First point of call if a pollution incident occurs
- Responsible for determining the level of action required (stop work/using appropriate measures to manage the incident).
- Notification of incident to Operations Manager
- Manages, Cleans and Controls incident and returns business to normal
- Notify administration to complete an incident report
- Ensure corrective actions decided upon by the management team are being implemented.

Operations Manager – **Mark Emery 0428 122 994**

- Determines if incident requires authorities to be notified
- Informs neighbours of incident and provides updates to affected persons
- Assists in the clean-up of the incident and helps return business to normal
- Ensure corrective actions decided upon by the management team are being implemented.

General Manager – **Charlie Emery 0411 221 711**

- Alerts relevant authorities within 1 hour of incident occurring
- Provides updates to persons affected and authorities as needed.


Management Team

- Review's incident reports and discusses the corrective and preventive actions that could be implemented
- Ensures that corrective/preventative actions have been put in place by final review of incident
- Closes incident report.

1.4 Notification of External Parties

The following outlines the contact details and correct sequence for notification in the event of a notifiable pollution incident. The General Manager will carry out the notifications required below (where applicable):

- | | |
|---|--------------------------------------|
| • Emergency Services (if dealing with an emergency) | 000 |
| • Affected Persons | See 1.5 below |
| • EPA Environment Line | 131 555 |
| • Public Health Unit (Lismore) | 02 6620 7585 (Public Health Officer) |
| • SafeWork NSW | 13 10 50 (Option 2; Option 2) |
| • Tweed Shire Council (Environmental Health) | 02 6670 7403 |
| • SOLO Resource Recovery | 02 6674 7656 |

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Other emergency contacts include:

- Rural Fire Service (bushfire information 9am to 5pm) 1800 679 737
- State Emergency Service (floods & storms) 132 500
- Roads & Maritime Services (road closures) 132 701
- Police Assistance Line 131 444

1.5 Communicating with neighbours and local community

Communicating with neighbours and the local community is essential when managing the response to a pollution incident. Providing early warning and regular updates to the owners and occupiers of premises who may be affected by a pollution incident is required. If deemed necessary, neighbouring properties (stakeholders) will be door knocked to ensure they are informed of an emergency situation.

Stakeholder liaison will then be coordinated from Head Office by the General Manager. Regular updates will continue by phone and email while the incident is managed back to normal operations.

Stakeholders will be advised by door knocking when the incident is controlled, and normal operations have recommenced.

Neighbours and local community directly adjacent to site who may be included in this process include:

- Tweed Resource Recovery Centre (west) 02 6670 7400
- Tweed Junktion (west) 0409 079 205 (Second-hand shop)
- KJ & RM Lot 8/564356 (north) 0407 007 909
- GR & KD O’Keefe Lot 2/590220 (east) 0409 763 573
- N & N Bushnell Lot 3/705781 (south) 0423 547 723
- PM Flanagan Lot 2/705781 (south) 0458 483 365

1.6 Potential pollutants and their location on site


At all times minimising harm to persons will be a priority. The following inventory of potential pollutants is therefore provided to ensure site staff and emergency service personnel understand the potential scale and likely impact of a pollution incident.

- Food organics & Garden organics (FOGO): Awaiting processing stored at west end of building
- First flush stormwater: External underground storage tank (21,000L)
- Leachate storage: Multiple underground storage tanks and piping (210,000L)
- Diesel Fuel: Self bunded tank for diesel storage (5,000L)
- Oil & Grease: Self bunded container for oil and grease storage (500L)

1.7 Site Layout

A site layout is provided on the noticeboard located in the site office and includes the following information:

- Location of the premises (refer Figure 2)
- The surrounding areas likely to be affected by a pollution incident (refer Figure 2)
- The location of potential pollutants on the premises (refer Figure 3)
- The location of stormwater drains and on site detention tanks (refer Figure 3); and
- Emergency services information such as fire hydrants, fire hose reels, spill kits, first aid kits and emergency assembly point (refer Figure 3).

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The site layout is important as an operational and emergency management tool and is essential to helping to ensure proper emergency planning and response. The site layout is included as part of the SOILCO site induction procedure so that all visitors and contractors are familiar with this information.

1.8 Training, Testing and Review.

There is a low risk of a pollution incident occurring. SOILCO will review the PIRP after 12 months and amend as required. Testing the plan to ensure it is current and up to date will be completed **ANNUALLY** i.e., all telephone numbers are true and correct. All staff will be trained in the PIRP and relevant emergency response procedures contained in the Site Specific Management Plan (Soilco510).

All staff working on site will be inducted prior to commencing work. The OPF will directly employ one fulltime Team Leader along with one Depot Hand. Casual and weekend relief staff will be required from time to time.

The premises are secure and alarmed with back to base monitoring. Unauthorised access to the site is difficult given the security fencing around the entire perimeter. Visitors must access the weighbridge prior to entry to the site and all subsequent public areas are outside the processing building.

Staff training includes the environmental guidelines discussed throughout this document. Emergency planning and procedures are also part of the Company’s SMS i.e. an evacuation plan. SOILCO recognises and acknowledges its obligations to take all practicable action to protect the health and safety of its employees, customers, and visitors.



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Figure 2: Surrounding Areas Potentially Impacted by a Pollution Incident

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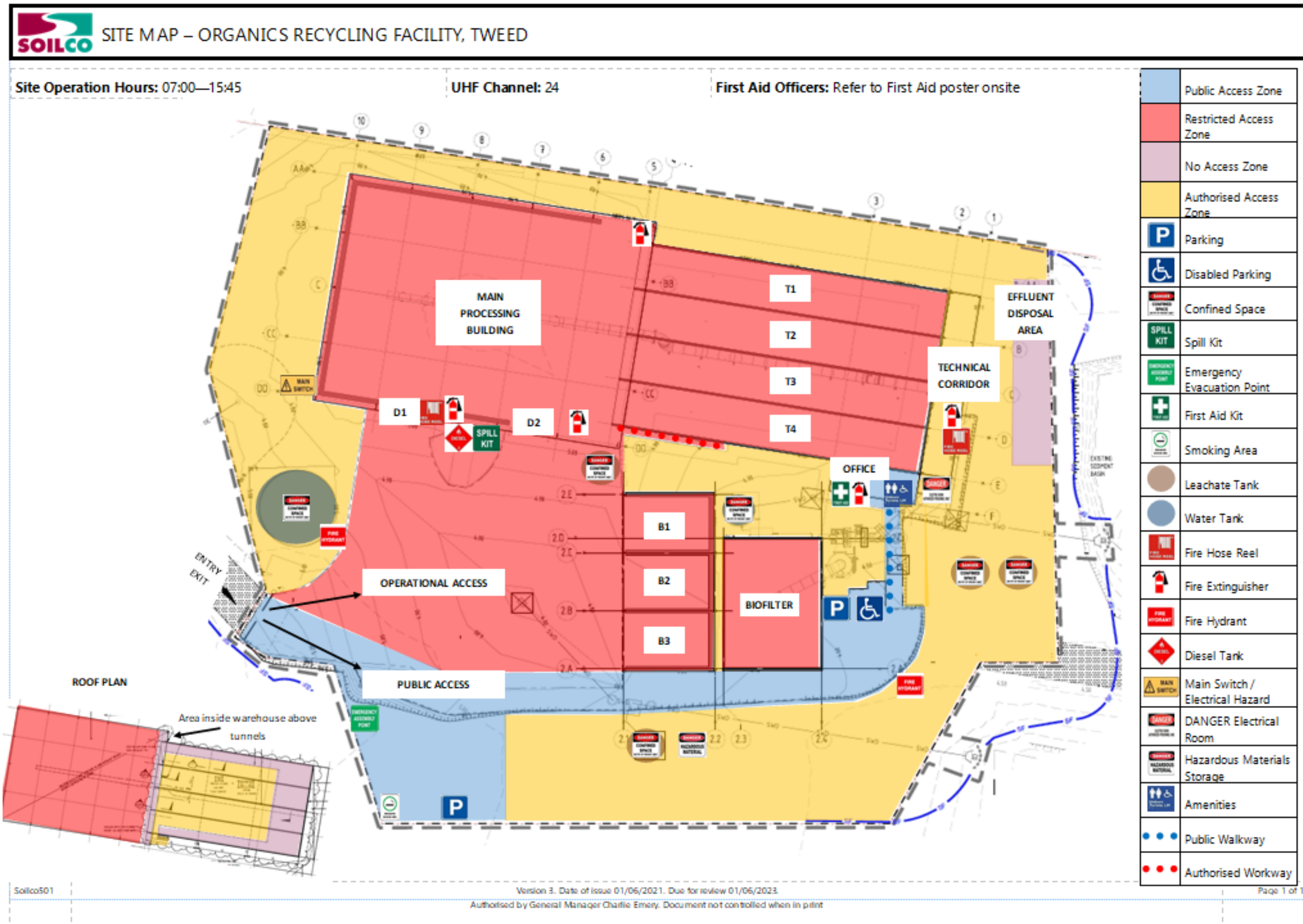


Figure 3: Organics Processing Facility Site Layout