



Table of Contents

Version Control	2
POLLUTION INCIDENT RESPONSE PROCEDURE	4
CONTACT LIST	5
POLLUTION INCIDENT DETAILS	7
1. Purpose	8
2. Background	8
3. Definitions	8
4. Main Hazards	10
5. Pre-emptive Actions	11
6. Inventory of Pollutants.....	11
7. Safety Equipment.....	11
8. Communicating with Neighbours and Local Community.....	11
9. Staff Training.....	11
10. Testing and updating the PIRMP	11
11. Availability of the PIRMP	13
12. Post-Incident Review and Reporting.....	14
13. Climate Change Considerations	14
13.1 Greenhouse Gas Management.....	14
13.2 Leachate Management and Flood Resilience	14
Appendix A – Maps.....	15
Table 1. Potential hazards and likelihood of occurrence.....	10
Table 5. PIRMP testing details.....	12
Table 6. PIRMP testing personnel	13

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Pollution Incident Response Management Plan



Document Title: Kimbriki Resource Recovery Centre Pollution Incident Response Management Plan (PIRMP)

Version Control

Version No.	Prepared/ Revised by and Date	Amended Section(s)	Action/ Amendment Description	Approved by and Date
0	GMRC 30/5/17	NA	Final version	GMRC 30/5/17
1	Belinda Lau Bec O'Brien 31/5/19	Various sections	Various revisions e.g. add flow chart for PIRMP implementation, update pollutant inventory and maps	Mark Winser 31/5/19
2	Bec O'Brien Belinda Lau 16/12/19	Various sections	Various updates to document following feedback from PIRMP training and testing. See 06 System Records, Consultation	Mark Winser 16/12/19
3	Bec O'Brien Belinda Lau 8/01/20	Contact List	Update	Mark Winser 8/01/20
4	Bec O'Brien Belinda Lau 23/3/20	Contact List Inventory of pollutants Maps Other sections	Update and incorporate changes from new PIRMP guidelines published March 2020	Mark Winser 20/5/20
5	Bec O'Brien Belinda Lau 14/04/21	Contact List Inventory of pollutants Other sections	Update with consideration of findings from EPA Summary Report for Solid waste landfills – compliance audit program, dated February 2021	Mark Winser 30/4/21
6	Bonnie Lu Belinda Lau 10/5/22	List of notifiable pollution incidents in Procedure and Definitions Contact List Inventory of Pollutants PIRMP Pollutant and Safety Equipment Map	Updated these sections of the PIRMP	Mark Winser 10/5/22
7	Bonnie Lu Peter Bramich 03/04/2023	Contact List	Update	Mark Winser 04/04/23



Pollution Incident Response Management Plan



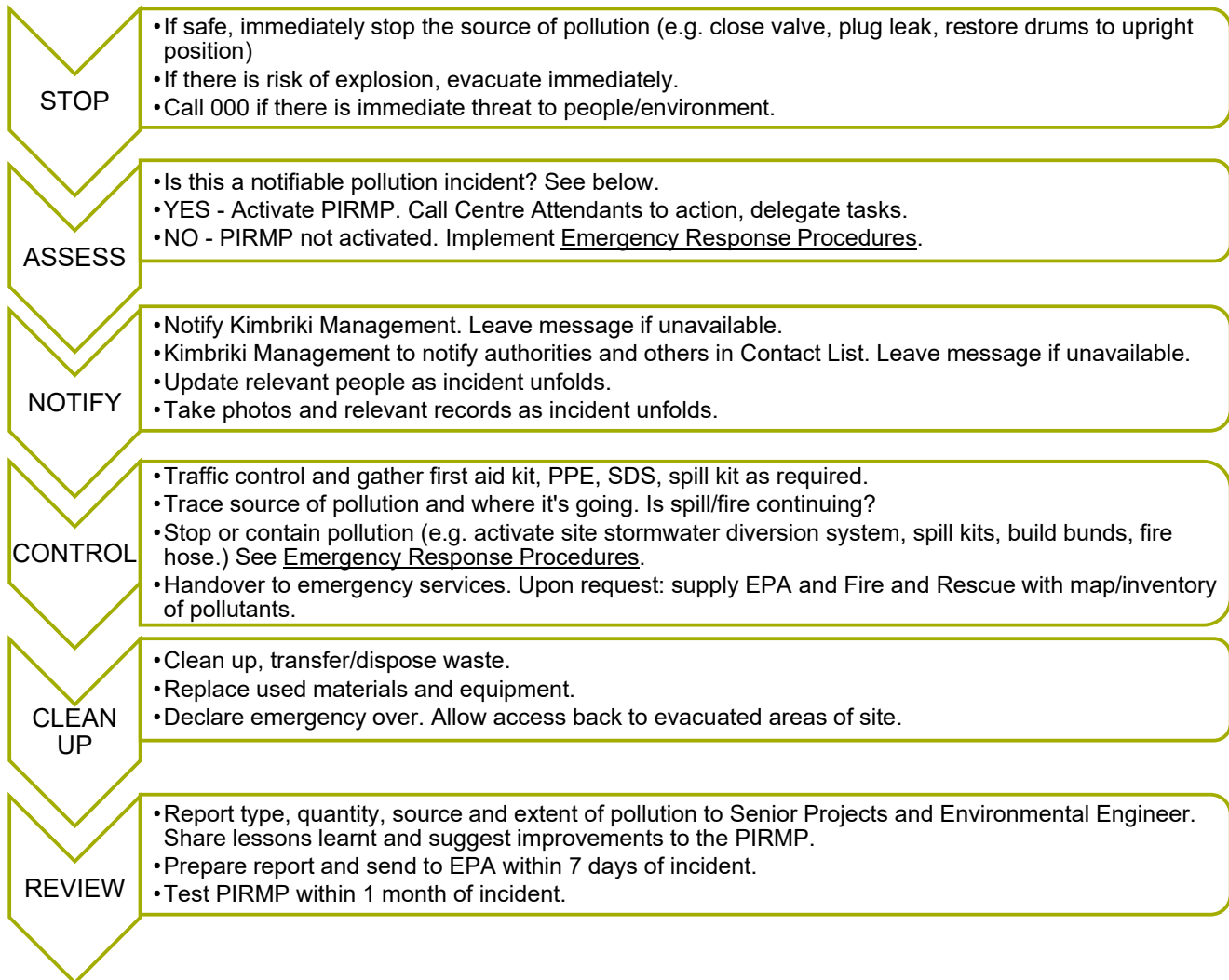
8	Bonnie Lu 26/06/2023	Inventory of Pollutants Details of PIRMP testing	Update	Mark Winser 26/06/23
9	Bonnie Lu 25/06/2024	Inventory of Pollutants Details of PIRMP testing	Update	Peter Bramich Mark Winser 25/06/2024
10	Bonnie Lu Sandra Western 26/06/2025	Contact List Inventory of Pollutants Details of PIRMP testing Climate Change Considerations	Update with consideration of findings from EPA Advisory Letter for PIRMP and EPA Climate Change Action Plan 2023–26	Mark Winser 26/06/2025
11	Sam Woollett Bonnie Lu 17/6/2026	Contact List Definitions Inventory of Pollutants Training and Testing record PIRMP Pollutant and Safety Equipment Map	Update with consideration of POEP Act 2025 amendment	Mark Winser Jim Kelly 17/06/2026



POLLUTION INCIDENT RESPONSE PROCEDURE

If it is suspected that a pollution incident may cause material harm to people or the environment, the following steps shall be implemented.

Responsibilities: Works Coordinator (may delegate notifications e.g., Centre Attendant, Customer Service & Administration Officer), Centre Attendant, Senior Projects and Environmental Engineer.



A notifiable pollution incident is any of the following:

- If Fire and Rescue NSW are required to put out a fire.
- If a fire is greater than 30 minutes duration.
- If leachate directly discharges to surface waters offsite.
- If fire water or water contaminated by a fuel, oil or chemical spill is directly discharged offsite.
- A vehicle rollover that results in a fuel/oil/chemical spill.
- A fire that results in significant plant/vehicle/machinery damage.

A PIRMP activation may be reversed as more information becomes available.



CONTACT LIST

Person/Organisation to Contact	Phone Number
(i) Person responsible for activating the PIRMP - 24-hour contacts - These individuals are responsible for activating the PIRM plan and are contactable 24 hours a day.	
Please note, this section has been removed from the version published on the KEE Website. Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.	
(ii) Notify Kimbriki Management - 24-hour contacts - These individuals are authorised to notify the relevant authorities and are responsible for managing the response to a pollution incident and are contactable 24 hours a day.	
Please note, this section has been removed from the version published on the KEE Website. Members of the community can contact the KEE Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.	
(iii) Notify these authorities immediately after PIRMP is activated	
Fire and Rescue NSW <ul style="list-style-type: none"> • Immediate threat to people or environment • No immediate threat 	000 1300 729 579
EPA (complete Pollution Incident Details form)	131 555
SafeWork NSW (EPA reference # required)	13 10 50
Northern Beaches Council	1300 434 434
NSW National Parks & Wildlife Service (Northern Beaches – Forestville) <ul style="list-style-type: none"> • If contaminated surface water discharges offsite, or • Fire spreads to surrounding bushland. 	9451 3479
(iv) Notify affected contractors	
Please note, this section has been removed from the version published on the KEE Website. Members of the community can contact the KEE Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.	
(v) Notify weighbridge operators if they are required to divert vehicles	
Please note, this section has been removed from the version published on the KEE Website. Members of the community can contact the KEE Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.	
(vi) Notify neighbours who may be affected by the pollution incident	
Provide the following information relevant to the pollution incident: <ul style="list-style-type: none"> • What has happened 	



Pollution Incident Response Management Plan



Person/Organisation to Contact	Phone Number
<ul style="list-style-type: none">• The environmental and/or safety implications for them• Actions taken or being taken to minimise harm/risk• Actions the landowner/occupier need to take to minimise risk of harm, example:<ul style="list-style-type: none">(a) close windows, doors and remain inside for incidents involving smoke/fire(b) any instructions from Fire and Rescue(c) avoid use of Deep Creek/Narrabeen Lagoon• What to expect, short/long term impacts• Where additional information will be published or available• Contact details for further queries or concerns	
<p>Please note, this section has been removed from the version published on the KEE Website. Members of the community can contact the KEE Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.</p>	



Pollution Incident Response Management Plan



POLLUTION INCIDENT DETAILS

Complete this form with information known to you when reporting to the EPA. Where details are unknown at the time of the notification write 'unknown' in the relevant box.

If (c), (d) or (e) is unknown at time of notification but becomes known afterwards, immediately call EPA again and notify of new information.

Information	Details known at time of notification	
Name of person notifying the EPA		
Date/time EPA was notified	Date:	Time:
Report to EPA the following information required under s148 POEO Act		
Premises details	KIMBRIKI RESOURCE RECOVERY CENTRE KIMBRIKI RD TERREY HILLS NSW 2084	
(a.i) Date & Time of incident	Date:	Time:
(a.ii) Duration of incident		
(a.iii) Nature of incident e.g. oil spill, fire		
(a.iv) Location of incident e.g. Landfill		
(b) Specific location and spatial extent of pollution e.g. length of creek, m ² of soil		
(c) Nature & estimated quantity of pollutant	Type:	Quantity/volume/concentration:
(d) Cause of the incident		
(e) Actions taken or proposed		
Weather conditions: Rainfall, wind direction and speed, temperature, smoke/dust etc		
EPA self-report reference # and advice from the EPA		



1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to comply with the following:

- Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (General) Regulation 2022
- NSW EPA Environmental Guideline: Pollution Incident Response Management Plans 2022
- Environmental Protection Licences 13090 & 13091

The objectives of this plan are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, relevant authorities and people outside the facility who may be affected by the pollution incident
- Minimise and control the risk of a pollution incident at the facility by identifying risks and planning actions to manage those risks

2. Background

The POEO Act requires companies holding an Environment Protection Licence/s to prepare, keep, test and implement a PIRMP. The Kimbriki Emergency Management Plan and Emergency Response Procedures shall be followed when there is immediate threat to the safety of people. If the emergency involves a notifiable pollution incident, Kimbriki must immediately implement the PIRMP as well.

Note: Measures to secure the safety of people and the site should be dealt with as the highest priority.

3. Definitions

Term	Definition
Pollution Incident	<p>Incident or set of circumstances where 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. Includes an incident or set of circumstances where:</p> <ul style="list-style-type: none"> • A substance has been placed or disposed on premises. • Odours are emitted <p>Does not include noise emissions.</p>
Notifiable Pollution Incident	<p>Pollution incident where there is a risk of 'material harm to the environment'. This type of pollution incident must be reported immediately to:</p> <ul style="list-style-type: none"> • EPA; • Fire and Rescue NSW; • Safework NSW; and • Northern Beaches Council
Material Harm	<p>a) Harm to the environment is material if:</p> <ul style="list-style-type: none"> • It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial*, or • It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations) and



Pollution Incident Response Management Plan



Term	Definition
	<p>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.</p> <p>Note: The above definition is still applicable to material harm that is confined to the premises where the pollution incident occurs.</p> <p>*Non-trivial actual or potential harm is any of the following:</p> <ul style="list-style-type: none"> • If Fire and Rescue NSW are required to put out a fire. • If a fire is greater than 30 minutes duration. • If leachate directly discharges to surface waters offsite. • If fire water or water contaminated by a fuel, oil or chemical spill is directly discharged offsite. • A vehicle rollover that results in a fuel/oil/chemical spill. • A fire that results in significant plant/vehicle/machinery damage.
Emergency Control Organisation (ECO)	<p>A group of Kimbriki workers who are responsible for implementing the PIRMP and participate in PIRMP training and testing. The ECO has the following roles:</p> <ul style="list-style-type: none"> • Chief Warden (Works Coordinator) • Combat Assistant (at least 3 Centre Attendants) • Post-incident Reporter (Site Engineer)
ANL	Australian Native Landscapes Pty Ltd
CWDS	Clean Water Diversion System
ESC	Erosion and sediment control
GCL	Geosynthetic clay liner
HDPE	High density polyethylene
IBC	Intermediate bulk container
BMS	Kimbriki Environmental Enterprises Business Management System
KEE	Kimbriki Environmental Enterprises Pty Ltd
KRRC	Kimbriki Resource Recovery Centre
PIRMP	Pollution Incident Response Management Plan
VENM	Virgin Excavated Natural Material
VPA	Vegetation Processing Area



4. Main Hazards

The main hazards to human health or the environment at the KRRC are described below.

Table 1. Potential hazards and likelihood of occurrence

Potential Hazard	Likelihood (Refer to the <u>Risk Matrix & Hierarchy of Controls in the BMS</u>)
<p>Escape of leachate / contaminated stormwater off site which can impact aquatic ecosystems.</p> <p>E.g. Leachate dam overflow, leachate treatment plant overflow, failure in landfill batters, fire water</p>	<p>Possible (once in 1 to 2 years)</p>
<p>Stormwater event causing the escape of significant levels of sediment off site which can impact aquatic ecosystems.</p> <p>E.g. Sediment basin overflows or structural failure</p>	<p>Possible (once in 1 to 2 years)</p>
<p>Illegal disposal of hazardous waste on site can lead to fire, contamination of waters or impacts to human health.</p>	<p>Possible (once in 1 to 2 years)</p>
<p>Fire on site causing smoke on and off site can cause respiratory issues with excess smoke inhalation.</p> <p>E.g. vegetation stockpile fire, landfill fire, customer disposes prohibited waste that will cause fire such as gas cylinders</p>	<p>Unlikely (once in 2 to 5 years)</p>
<p>Asbestos contamination can cause illness in people upon exposure.</p>	<p>Possible (once in 1 to 2 years)</p>
<p>Fuel/chemical contamination/leak/spill can impact aquatic ecosystems.</p>	<p>Possible (once in 1 to 2 years)</p>
<p>Uncontrolled release of landfill gas can cause offensive odour, risk of combustion or asphyxiation if it accumulates in enclosed spaces.</p> <p>E.g. uncovered risers/confined spaces, failure in landfill batters</p>	<p>Unlikely (once in 2 to 5 years)</p>



5. Pre-emptive Actions

Please note, this section has been removed from the version published on the KEE Website.

Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.

6. Inventory of Pollutants

Please note, this section has been removed from the version published on the KEE Website.

Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.

7. Safety Equipment

Please note, this section has been removed from the version published on the KEE Website.

Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.

8. Communicating with Neighbours and Local Community

The Chief Warden or delegate shall provide early warnings and regular updates to owners and occupiers of premises who may be affected by the pollution incident via phone call or door knock (Contact List). Head office shall post notifications, updates and safety information on the company website www.kimbriki.com.au

9. Staff Training

The ECO will be trained in PIRMP implementation and records of training and consultation shall be made in the Record of Training & Consultation Register of the BMS. Training may include toolbox talks, formal training on incident management and undertaking simulated incident exercises. Training shall ensure the PIRMP is properly implemented by staff, and is regularly tested for accuracy, currency and suitability.

Training for Chief Wardens and Combat Assistants shall include:

- Asbestos handling, containment and clean up/disposal
- Spill containment and clean up
- Fire extinguisher, fire blanket and fire hydrant operation
- Traffic control
- Back-up generator operation
- Back-up diesel pump operation
- Clean water diversion systems operation
- Leachate/stormwater overflow pipe operation

10. Testing and updating the PIRMP

The PIRMP shall be reviewed and tested at least once every 12 months, and updated as required, to ensure information in the plan is accurate, current and can be implemented in a workable and effective manner. The PIRMP shall also be tested and updated as required within one month of any pollution incident.

Testing may take the form of a post-incident debrief to assess whether:



Pollution Incident Response Management Plan



- the PIRMP was implemented efficiently during the activation
- there were areas of the PIRMP that did not work or could be improved
- all contact details were correct and up-to-date
- maps were accurate and sufficiently detailed
- any other details in the PIRMP need to be updated.

The test will involve all members of the ECO and may be delivered via desktop simulations or practical exercises. Tests are coordinated by the Site Engineer and may be conducted in association with emergency response drills. Tests shall be recorded in the Record of Training & Consultation Register of the BMS.

Test records should include the following details:

- the names and positions of personnel involved in the test
- the date on which the plan was tested
- whether others assisted with the testing (e.g. response agencies)
- the nature of the test (ideally a copy of any test plan)
- the specific sections of the PIRMP tested in detail
- the findings of the test and the nature of changes made to the PIRMP to address any issues, including the version of the PIRMP changes were reflected in
- a copy of the test report i.e. completed Record of Training & Consultation from the BMS.

Table 2. PIRMP testing details

Date tested	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)
13/6/2019 17/6/2019 19/9/2019	Desktop simulation	Noted that some phone numbers will need confirmation for revision in the contact list	Jun-20
23/3/2020	Desktop simulation - annual test and additional test performed one month after a pollution incident	Noted that the inventory of pollutants should be reviewed and revised as required	Jun-21
26/5/2021	Field exercises - Diesel Spill	<ul style="list-style-type: none"> • Have a folder/tray marked PIRMP or colour coded in every Kimbriki vehicle with the 4-page guide in it at least. • Provide the weighbridge with the PIRMP folder / complete PIRMP for their reference • Consider (remind) office locations for the 4 page PIRMP guide for quick reference 	Jun-22
22/2/2022	Desktop simulation	<ul style="list-style-type: none"> • Staff training – reiterate who needs to be contacted when the PIRMP is activated. 	Jun-22



Pollution Incident Response Management Plan



Date tested	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)
	- additional test performed within one month after a pollution incident.	• Contact list – some phone numbers need to be updated.	
31/5/2022 9/6/2022	Field exercises – Fire onsite	N/A	Jun-23
13/6/2023 15/6/2023	Field exercises - Chemical Spill	Spill kit sign to be installed in Household Problem Waste Area	Jun-24
11/6/2024 20/6/2024	Field exercises – Waste Oil Spill	Prepare 50 sandbags to store on a pallet in the 'Pollution Control Equipment' container in Transfer Station for pollution control	Jun-25
17/6/2025 26/6/2025	Field exercises – Fire Water Spill	Two IBC and a pallet of sandbags has been positioned at the rear of Eco House & Garden as a preventative measure to contain and control the potential spread of pollutants in the event of an incident.	Jun-26
2/6/2026 4/6/2026	Field exercises – Mattress pile fire onsite	It is recommended that the mattress stockpile be relocated to a proposed location, where it is separated from public areas and where fire water can be more effectively contained and managed during an emergency.	Jun-27

Table 3. PIRMP testing personnel

Please note, this section has been removed from the version published on the KEE Website.

Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.

11. Availability of the PIRMP

A copy of the PIRMP is at Reception in the Administration Building, in the Works Coordinators' office and in the BMS. Additional copies of the PIRMP shall be put in other areas of the site as required.

The following information shall be made available on the Kimbriki website:

- KEE procedure for contacting the EPA, SafeWork NSW, Northern Beaches Council, Fire and Rescue NSW.
- KEE procedures for communicating with the community when a notifiable pollution incident occurs.



12. Post-Incident Review and Reporting

The Chief Warden and/or Combat Assistants shall complete the Pollution Incident Details form with information known to them when reporting to the EPA. Information to be reported include the type, quantity, source and extent of the pollution incident. If any of this information is unknown at the time of notification but becomes known afterwards, immediately call the EPA again to supply the new information.

Completed Pollution Incident Details form/s shall be supplied to the General Manager Operations, who will prepare a written report and send it to EPA within 7 days of the incident. They shall facilitate PIRMP testing within 1 month of the incident.

13. Climate Change Considerations

The EPA Climate Change Policy (2023) outlines the requirement for licensees to reduce greenhouse gas emissions and adapt to the physical impacts of climate change. In response, KEE has identified key climate-related risks and mitigation strategies relevant to pollution incident prevention and response.

13.1 Greenhouse Gas Management

To reduce the risk of uncontrolled gas release, improve air quality, KEE actively manages landfill gas emissions through:

- A landfill gas collection and flaring system, which captures methane and combusts it to reduce global warming potential.
- Continuous expansion of the landfill gas network in new and old landfill cells to improve gas capture efficiency.
- Ongoing monitoring of methane concentrations and gas flow rates to ensure system performance and early detection of leaks.
- Monitor the surface landfill gas quarterly in the green waste platform operated by Australian Native Landscapes (ANL).

13.2 Leachate Management and Flood Resilience

Increased rainfall intensity due to climate change can lead to:

- Elevated leachate levels
- Dam overflows
- Greater likelihood of pollution incidents involving contaminated water

The following measures has been implemented to address this:

- Constructed the Clean Water Diversion System (CWDS) to divert uncontaminated surface water away from landfill areas which has significantly reduced leachate generation.
- Routine inspection and maintenance of the CWDS, sediment basins, and leachate storage infrastructure.
- Monitoring of rainfall events and management of leachate levels.



Appendix A – Maps

Please note, this section has been removed from the version published on the KEE Website.

Members of the community can contact the Kimbriki Team on 02 9486 3512 to raise any queries, complaints or concerns with the business.