



***Warren Pollution Incident Response  
Management Plan (Public)***

***Document No:*** WP1 - 000 - OHS - ENV - 003B

## **1. Introduction**

This Pollution Incident Response Management Plan (PIRMP) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act), the *Protection of the Environment Operations (General) Regulation 2009* and the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). Green Distillation Technologies' Environmental Management Plan works in conjunction with this document.

The Warren Plant's Environmental Management Plan (EMP) is an integral part of the plant's Safety Management Plan.

The purpose of the PIRMP and EMP are to provide guidance in the management of environmental issues arising during operation and is intended to fulfil government mandated requirements and implementation of company policy as commitment to responsible environmental management.

This plan has been developed to provide guidance for employees and subcontractors to ensure protection measures are implemented. Senior plant staff with the support of head office management will implement this plan. The Site Manager will ensure correct implementation of safety systems, including procedures, registers and reporting described herein.

Further, training in environmental awareness will be provided by a nominated GDT employee holding competency equivalent or better to Certificate IV in Workplace Training and Assessment.

Under the legislation referred to above, the facility's environmental license requires a PIRMP to clearly document pollution risks, communication procedures, training and testing for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The goal of this PIRMP is to improve how pollution incidents are reported, managed and communicated and to build and maintain a culture of continuous improvement with commitment to environmental safety best practice.

## 2. Company, Facility and License Details

The facility details as per Environmental Protection License 21183 are summarised in the Table below.

<b>Green Distillation Technologies Pty. Ltd.</b>	
License Number	21183
Scheduled Activities	Energy recovery Resource recovery Waste storage
Fee Based Activity	Energy recovery from hazardous and other waste Recovery of waste tyres Waste storage – waste tyres
Region	Central West L102, 346 Panorama Avenue Bathurst NSW 2795 (02) 6333 3800 PO Box 1388 Bathurst NSW 2795
Facility Details	Ewenmar Tip Site 8146 Oxley Highway Warren NSW 2824 (02) 6847 4231
Head Office Details	Building 1, 658 Church Street Cremorne VIC 3121 (03) 9826 2335 <a href="http://www.gdtc6.com">www.gdtc6.com</a>

### **3. Communication**

#### **3.1. Incident Reporting**

All incidents are to be reported immediately to the onsite shift supervisor and then by email to the Site Manager and Chief Operations Officer. If a pollution incident occurs where environmental harm is caused or threatened the NSW EPA must be notified within 24 hours. If the incident presents a threat to human health or property, emergency services are to be contacted immediately.

Contact details for external authorities are listed below.

#### **3.2. External Authorities Contact Details**

<b>Authority</b>	<b>Nature of Incident</b>	<b>Contact</b>
Environmental Protection Authority	Reporting pollution incident	131 555
Emergency services (Ambulance, Fire, Police)	If requiring emergency service	000
SafeWork NSW	Reporting a safety incident or injury	131 050

## **4. Facility Overview, Hazard Identification and Risk Assessment**

### **4.1. Overview of Operations**

The premises and facilities associated with EPL 21183 are owned and operated by Green Distillation Technologies Corporation Pty. Ltd.

The facility is designed for the recycling of end of life passenger and truck tyres with Destructive Distillation. This process requires tyres to be heated in an inert atmosphere to produce hydrocarbons, which are extracted leaving behind carbon and steel wire as residue.

The facility is designed to process 19,300 tonnes of end-of-life tyres per year, from small passenger through to super-single road-train sizes.

### **4.2. Hazard Management**

This section deals with the [POEO \(General\) Regulation 2009's sections 98\(a\) to 98\(f\)](#) and partially covers s98(j). These sections deal with hazard identification, likelihood and pre-emptive action to mitigate environmental harm. Risk assessments have been performed identifying control measures to minimise these risks. GDT perform risk assessments with periodical reviews involving all levels of site-staff, engineering and head office management.

This plan considers the potential, and remedial action to be taken for accidental discharge of pollutants to air, water and land. Design and environmental management systems are in place to minimise the likelihood and consequence of a pollution incident. Despite best design and management methods, accidental incidents are still possible and covered by the incident response methods described in the following sections.

Details of these systems can be found herein and in further detail in the GDT Environmental Management Plan.

**4.3. Summary of Pollutant Types**

Destructive Distillation by its nature has a limited list of pollutions requiring consideration in this PIRMP. Below is a summary of all pollutants present at the facility.

<b>Air Based Emissions</b>	
Dust	<p>From machinery operation</p> <ul style="list-style-type: none"> <li>• Forklift</li> <li>• Knuckle boom</li> <li>• Crane</li> <li>• See GDT Policy on Traffic Management</li> </ul>
Fire	<p>Tyre stockpile fire</p> <ul style="list-style-type: none"> <li>• A tyre storage procedure is in place, as cited by NSW Fire and Rescue</li> <li>• Procedure in the event of tyre fire</li> <li>• Both of these documents can be found in the Environmental Management Plan – Appendix 1</li> </ul> <p>Process fire during EOL tyre destruction</p> <ul style="list-style-type: none"> <li>• All systems with potential for fire during tyre processing have nitrogen inlets to smother and extinguish fires</li> </ul> <p>See <b>GDT Operations Manual</b> for procedures in the event of process fire</p>
Gas Emissions	<p>Gas emissions identified as emissions from</p> <ul style="list-style-type: none"> <li>• Exhaust system</li> <li>• Vapour product extraction system</li> </ul> <p>Details of preventative hazards, likelihoods and actions can be found in Risk Assessment <b>Uncontrolled Gas Release of Gas</b></p>
Odour	<p>Open water systems have potential to develop odour caused by sulphur reducing bacteria (SRB)</p> <p>Systems (Serpentine cooler) provide aeration of these water systems to prevent proliferation and prevent odour build-up</p>
<b>Spill Type Emissions</b>	
Oil	<p>From oil storage bodies and connecting pipework</p> <p>Details of preventative hazards, likelihoods and actions can be found in Risk Assessment <b>Storage of Oil</b></p>
Secondary Water	<p>Bodies / vessels containing secondary water</p> <p>Details of preventative hazards, likelihoods and actions can be found in Risk Assessment Flooding of <b>Secondary Water Sumps</b> and <b>Secondary Water Purification</b></p>

**4.4. Inventory of Potential Pollutants at Warren Plant**

An assessment of materials on site was performed to identify potential pollutants. Oil spillage from storage and recycled process water overflow were the materials identified.

Maximum quantity of potential pollutants stored at site listed below.

<b>Contents</b>	<b>Vol (m<sup>3</sup>)</b>
Product oil	61.7
Process water	27.1

**4.5. Safety Equipment**

Details of safety equipment kept on site can be found in the OH&S manual under headings “PPE and Safety Equipment Register” and “MSDS Register” in the Operations Manual.

Fire extinguishers are kept in the crib room, at each processing Module and all electrical cabinets. Locations of each of the above can be found in the *Site Safety Equipment Layout* in the document appendix under section 7.2.

**5. Compliance**

**5.1. Responsibilities**

All staff and contractors are responsible for the implementation of this plan.

Management are responsible for ensuring that staff are familiar with the PIRMP and their own roles and/or responsibilities. Staff training in implementing this plan will be provided by the training coordinator at the request of the Site Manager.

The Site Manager is responsible for

- Providing guidance and support on the reporting and response processes;
- Ensuring the plan is made available to all staff;
- Assisting in the notification of pollution incidents to the relevant authorities;
- Ensuring site maps associated with this plan are the latest revisions;
- Assistance with the implementation of response actions to pollution incidents;
- Assistance in communicating with the local community about the plan and when incidents of a certain nature occur;
- Ensuring that training is provided informing staff in their roles in carrying out the plan;
- Testing and reviewing this plan.

**5.2. Plan Evaluation**

Incident, Environmental Spills and Complaints register are used to record and monitor all personnel and environmental incidents within the Warren Plant. These registers assist with record keeping, reporting and assessing improvements to incident response in review of this

plan. The Site Document Controller keeps the updated register. The Site Manager is responsible for monitoring and measuring the effectiveness of incident responses in this plan.

This Pollution Incident Response Management Plan complies with the requirements under

- [POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans](#)
- [POEO \(General\) Regulation 2009 Part 3A](#)

The requirements under the legislation are supported by the [Environmental Guidelines: Preparation of Pollution Incident Response Management Plans](#), which provide additional advice on plan preparation and review. A summary of key areas used in preparation and review from these resources can be found in the appendix under section 7.4.

### **5.3. Staff Awareness and Training**

All employees are to be made aware of this plan's requirements as part of their induction process and a yearly refresher provided thereafter. Training requirements are outlined in the GDT Training Manual and records of training readily available with original records maintained at site. A soft copy is provided to head office and accessible via the company server.

### **5.4. Plan Availability and Testing**

In accordance with Section 153D of the POEO Act, the plan is available to all employees via the server and to the public via the GDT website (gd6.com). A hard copy of this plan is available in operations office. This plan will be tested once a year to ensure information within is accurate and up to date.

## **6. Pollution Incident Response Procedure**

This section provides details on the incident response, including communication and on-site emergency response actions for responding to incident. See the following page for the general incident response procedure.

