

**Molycop360**

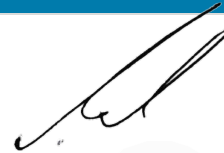
**Turners Lane  
Cootamundra**

**PIRMP—Premises  
and mobile plant**

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN Turners Lane – Cootamundra

Approved by: Keith Ritchie  
Position/Title: Plant Manager

Signature:



Date:  
21.9.22

### PURPOSE:

Commonwealth Steel (trading as Molycop360) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Turners Lane, Cootamundra. 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 on the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at 1 turners lane Cootamundra, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised NSW 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 NSW EPA's *Guideline: Pollution incident response management plans*.

## Environment Protection Licence (EPL) Details

**Name of licensee:** Commonwealth Steel Company Pty Ltd

ABN 58 000 007 698

**EPL number:** 21294

**Premises name and address:**

Molycop360; 1 Turners Lane,  
Cootamundra

**Company or business contact details**

**Name:** Keith Ritchie

**Position or title:** Plant Manager

**Business hours contact number/s:**

0409 170 085

**After hours contact number/s:**

0409 170 085

**Email:** [keith.ritchie@molycop.com](mailto:keith.ritchie@molycop.com)

**Website address:** [www.molycop.com](http://www.molycop.com)

**Scheduled activity/activities on EPL:**

Waste processing (non thermal treatment)

Waste storage

**Fee based activity/activities on EPL:**

Non thermal treatment of waste tyres

Waste storage - waste tyres

## Pollution incident – Person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s should the primary contact be unavailable.

### PIRMP activation

**Name of person responsible:** Keith Ritchie  
**Position or title:** Plant Manager  
**Business hours contact number/s:** 0409 170 085  
**After hours contact number/s:** 0409 170 085  
**Email:** [keith.ritchie@molycop.com](mailto:keith.ritchie@molycop.com)

## 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:** Keith Ritchie  
**Position or title:** Plant Manager  
**Business hours contact number/s:** 0409 170 085  
**After hours contact number/s:** 0409 170 085  
**Email:** [keith.ritchie@molycop.com](mailto:keith.ritchie@molycop.com)

### Managing response to pollution incident

**Name of person responsible:** Jamie Walmsley  
**Position or title:** Plant Manager  
**Business hours contact number/s:** 0409 170 085  
**After hours contact number/s:** 0409 170 085  
**Email:** [keith.ritchie@molycop.com](mailto:keith.ritchie@molycop.com)

## Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in 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. Environment Protection Authority – 131 555
3. Health NSW (nearest public health unit)

See [www.health.nsw.gov.au/Infectious/Pages/phus.aspx](http://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.

<b>Fire &amp; Rescue NSW / Rural Fire Service</b>	<b>Contact number/s: (02) 6386 3170</b>
<b>Environment Protection Authority</b>	<b>Contact number/s: 131555</b>
<b>Health NSW</b>	<b>Relevant Area Health Service: Contact number/s: (02)69401111</b>
<b>SafeWork NSW</b>	<b>Contact number/s: 131050</b>
<b>Local authority/s</b> Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area affected, or potentially affected, by the pollution.	<b>Contact number/s: Cootamundra Gundagai Council: 1300 459 689</b>
<b>Any other identified organisation or agency requiring notification (if applicable)</b> e.g. Water NSW, Department of Primary Industry, Roads and Maritime Services	<b>Contact number/s: NA</b>

## 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): **Cootamundra / Gundagai Council**

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):

- The premises is located in a semi remote location. The nearby neighbours will be advised by door knock if it is necessary after an incident arises.

#### Description and likelihood of hazards

- The main hazard associated with tyre processing is fire.
- The main hazard associated with mattress processing is fire & dust.

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

- The likelihood of a fire occurring from the shredding of tyres & mattresses is **LOW**. The shredder is fitted with a mist system to ensure that materials passing through are damp. This reduces dust and fire risk. The shredder is also retrofitted with an automatic fire suppression system that is activated if the cutting chambers heat tolerances are exceeded. Also, the site is located in an area which physically separates the fire risks from sensitive neighbours by distance

#### 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:

- Dust / Fire misting on shredder
- Fire suppression system on shredder
- Water tanker on site
- Dam to contain water for fighting fires
- Equipment to be fitted with fire extinguishers
- Tyre storage as per NSW fire and rescue guidelines
- A loader be available to use stockpiled dirt to extinguish fire

## Inventory of pollutants

**Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:**

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates

Location/Tank	Max. quantity	Contents	Comments
Site shed	1000lt	Diesel & oil	NA
Tyre Stockpiles	50t	Collected tyres Stored as per storage plan	NA
Mattress Stockpiles	750t	Foam, textile, metals	NA

## Safety equipment

Equipment	Date installed	Last review	Status	Comment
10000lt water tanker & pump	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
Loader to extinguish fire with cover	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
Spill Kit Installed	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
Fuel spill bunding installed	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
40000lt water storage tanks installed	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
Fire alarm / horn implemented	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
First aid kit	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
5 x fire extinguishers	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness
Fire suppression system installed on shredders	28/08/2019	20/09/2022	Operational	Reviewed Ritchie/Neave/Champness

## Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on:

- The premises is located in a semi remote location. The nearby neighbours will be advised by door knock if it is necessary after an incident arises.

Develop any specific information that could be provided to the community, so it can minimise the risk harm:

- Specific information will be incident specific however given the materials on site and the distance to community the only expected impact would relate to diffuse smoke from fire and that staying indoors would be a sufficient risk minimisation tactic.

## Minimising harm to persons on the premises

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on:

- A detailed Risk Management Action Plan is being developed for the site. In the interim the PIRMP and site evacuation remain as key protections for persons on the premises. In the event of fire a situation cannot be foreseen where persons would be trapped and unable to evacuate. The site has clear room on all sides of the potential fire sources to use as an escape route and a fire of the nature anticipated would start relatively slowly.

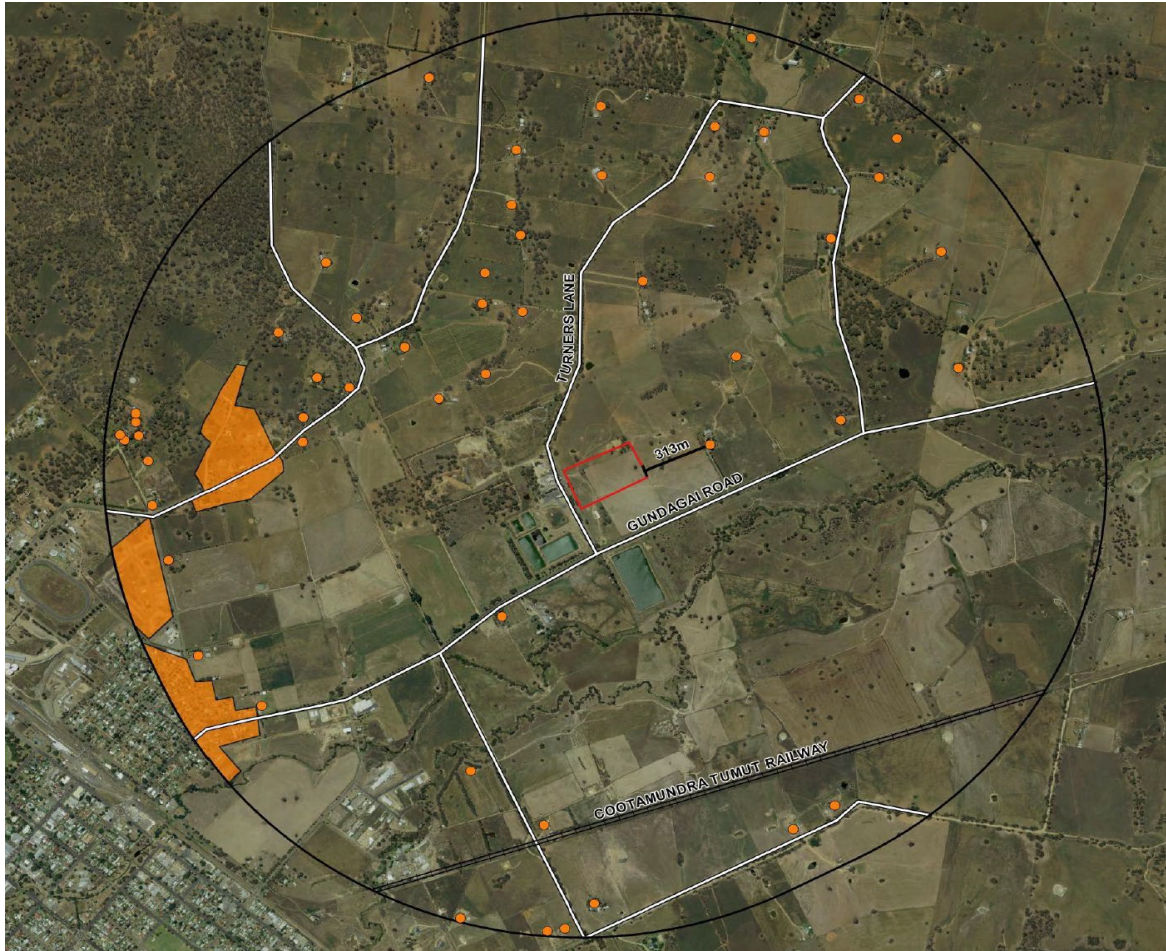


## Maps

Provide a detailed map (or set of maps) showing the:

- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of any stormwater drains on the premises.

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body stormwater drains located on the premises discharge to).





THIS PLAN IS PREPARED FROM A FIELD SURVEY FOR THE PURPOSE OF DESIGNING NEW CONSTRUCTIONS ON THE LAND AND SHOULD NOT BE USED FOR ANY OTHER PURPOSE.

SOME SERVICES SHOWN HEREON HAVE BEEN LOCATED BY FIELD SURVEY.

VISIBLE SERVICES HAVE BEEN LOCATED ONLY. PRIOR TO ANY DEMOLITION, EXCAVATION OR CONSTRUCTION ON THE SITE, THE PROXY AUTHORITY SHOULD BE CONTACTED FOR LOCATION OF FURTHER UNDERGROUND SERVICES AND DETAILED LOCATIONS OF ALL SERVICES.

THIS NOTE IS AN INTEGRAL PART OF THIS PLAN



#### DEVELOPMENT APPLICATION NOTE

1. CONCEPTUAL LAYOUT SHOWN HAS BEEN BASED ON EXTERNAL SURVEY AND LAND AND PROPERTY INFORMATION. CADASTRAL BOUNDARIES, SURVEY HAS BEEN MOVED TO MGA CO-ORDINATES, ROTATED AND SCALED TO SUIT CADASTRAL BOUNDARIES.
2. ALL DIMENSIONS AND DETAILS SHOWN ARE THEREFORE INDICATIVE AND FOR THE PURPOSE OF DEVELOPMENT APPLICATION ONLY. CONCEPTUAL LAYOUT SUBJECT TO DETAILED DESIGN AND BOUNDARIES SUBJECT TO DEFINITION BY A REGISTERED SURVEYOR.
3. ALL SURVEY SPOT HEIGHTS SHOWN ARE ON ASSUMED DATUM

#### LEGEND

- CONCEPTUAL SHED/PROCESS BUILDINGS
- CONCEPTUAL STORAGE/PROCESSING AREA
- CONCEPTUAL STORMWATER CATCHMENT DAM
- CONCEPTUAL VEGETATION SCREENING 5m WIDE
- SUBJECT BOUNDARY
- ADJOINING BOUNDARY
- EASEMENT AFFECTING LOT
- BUILDING/STRUCTURE
- ROAD CENTRELINE
- EDGE OF ROAD BITUMEN
- EDGE OF ROAD FORMATION
- OVERHEAD POWER LINE
- TOP OF BANK
- FENCE LINE
- CONTOUR
- POWER POLE
- TELECOMMUNICATION PIT
- TREE



COOTAMUNDRA - GUNDAGUI REGIONAL COUNCIL

Development Consent No. **DA2018/094 MOD1**

This stamped, endorsed page forms part of the Development Consent issued by Council (Issuing Authority) under the Environmental Planning and Assessment Act and is subject to compliance with the conditions of the approved formal notice of determination.

**28.7.20**

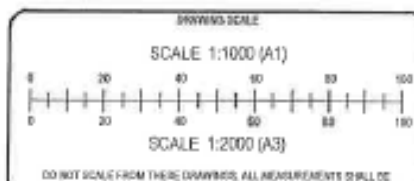
(Date) (Authorised Officer)

STRUCTURAL, CIVIL, PLANNING, SURVEYING,  
ARCHITECTURE & ENVIRONMENTAL

**Premise**

154 FISLEY STREET  
P.O. BOX 959  
ORANGE, NSW 2800  
Ph: (02) 6335 5000  
Fax: (02) 6335 5050  
www.premise.com.au

REV.	DATE	DETAIL	APPROV.	DETAILS
A	03/12/2018	GT	DN	ISSUED FOR APPROVAL
B	06/02/2019	GT	DN	ISSUED FOR APPROVAL - LATEST SITE SURVEY ADDED
C	06/03/2019	GT	DN	ISSUED FOR APPROVAL - RELOCATED OFFICE DETAILS - 3107
D	24/03/2019	GT	DN	ISSUED FOR APPROVAL - UPDATED AREA LABELLING
E	28/03/2019	GT	DN	ISSUED FOR APPROVAL - UPDATED AREA LABELLING
F	28/03/2019	GT	DN	ISSUED FOR APPROVAL - PROCESS AREA LABEL, ADD PRESS



APPROVAL AUTHORITY

Cootamundra-Gundagai Regional Council

CLIENT

JLW SERVICES

PROJECT

MODIFICATION OF APPROVED TYRE PROCESSING AND STORAGE FACILITY

TURNERS LANE, COOTAMUNDRA

DRAWING

MODIFICATION OF APPROVED TYRE PROCESSING AND STORAGE FACILITY LAYOUT

PROJECT NUMBER 216100

DRAWING FILE 216100\_TPM1-TPM2.dwg

DATE SOURCE

IMAGE SOURCE

STATUS FOR APPROVAL

SHEET TPM1 OF TPM2

02F



THIS PLAN IS PREPARED FROM A FIELD SURVEY FOR THE PURPOSE OF DESIGNING NEW CONSTRUCTIONS ON THE LAND AND SHOULD NOT BE USED FOR ANY OTHER PURPOSE.

SOME SERVICES SHOWN HEREON HAVE BEEN LOCATED BY FIELD SURVEY.

VISIBLE SERVICES HAVE BEEN LOCATED ONLY. PRIOR TO ANY DEMOLITION, EXCAVATION OR CONSTRUCTION ON THE SITE, THE RELEVANT AUTHORITY SHOULD BE CONTACTED FOR LOCATION OF FURTHER UNDERGROUND SERVICES AND DETAILED LOCATIONS OF ALL SERVICES.

THIS NOTE IS AN INTEGRAL PART OF THIS PLAN



COOTAMUNDRA

21  
DP1187448

475  
DP753801



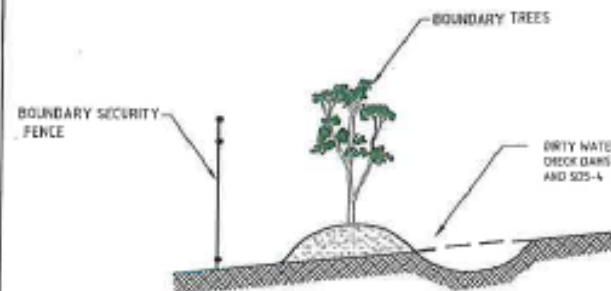
**COOTAMUNDRA - GUNDAGAI REGIONAL COUNCIL**

Development Consent No. **DA2018/001 WOOD**

This stamp is a part of the Development Consent issued by Council (Consent Authority) under the Environmental Planning and Assessment Act and is subject to compliance with the conditions of the attached formal notice of determination.

**28-7-20**  
(Date)

*[Signature]*  
(Authorised Officer)



BOUNDARY/DIVERSION DRAIN DETAIL  
NOT TO SCALE

**LEGEND**

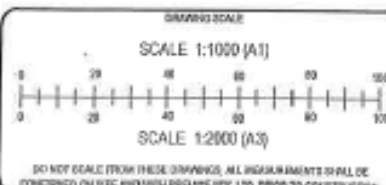
- PROCESSING/STORAGE AREAS
- CLEAN WATER DRAIN
- DIRTY WATER DRAIN
- SURFACE WATER RUNOFF DIRECTION

STRUCTURAL, CIVIL, PLANNING, SURVEYING,  
ARCHITECTURE & ENVIRONMENTAL



154 PEGLEY STREET  
P.O. BOX 1063  
GRAMSCIE, NSW 2860  
PH: (02) 6363 5000  
FX: (02) 6363 5050  
**Premise** [www.premise.com.au](http://www.premise.com.au)

REV.	DATE	BY	APPD.	DETAILS
A	09/02/19	GT	GW	ISSUED FOR APPROVAL
B	01/02/20	GT	GW	ISSUED FOR APPROVAL - LATEST SITE SURVEY ADDED
C	04/02/20	GT	GW	ISSUED FOR APPROVAL - PREDICATED OFFICE DETAILS - TP07
D	24/02/20	GT	GW	ISSUED FOR APPROVAL - LATEST AREA LABELLING
E	26/02/20	GT	GW	ISSUED FOR APPROVAL - UPDATED AREA LABELLING
F	29/02/20	GT	GW	ISSUED FOR APPROVAL - PROCESS AREA LABEL, ADD PRESS



CLIENT  
**JLW SERVICES**

PROJECT  
**MODIFICATION OF APPROVED TYRE PROCESSING AND STORAGE FACILITY TURNERS LANE, COOTAMUNDRA**

DRAWING: CONCEPT SURFACE STORMWATER MANAGEMENT PLAN			
PROJECT NUMBER: 216100	DRAWING FILE: TP07_216100.dwg	ORIGINAL	A1
DATE: 28/07/20			
SCALE: 1:1000			
STATUS: FOR APPROVAL	SHEET: TP05 OF TP07	DATE: 28/07/20	02F

## Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum early warnings, updates and actions to be taken during and after an incident:

- Molycop are currently developing detailed risk management plans. In the interim, the following points apply:
  - Chemical (fuel) spills are to be confined to prevent runoff and must be prevented from entering waterways including groundwater. This is ensured by the presence of earth bunding on the site. Contaminated soils can be excavated and stored on an impervious surface for proper disposal.
  - In the event of fire, and after the relevant authorities have been notified, actions should be focussed on minimising the extent of the fire. Consider moving machinery or other flammable materials away from the fire if it is safe to do so. Check weather forecasts to determine if wind changes could increase the risk of fire spreading. Ensure site entry gates are free for emergency services to enter. Prepare any relevant information to give to emergency services on their arrival.
  - Consider communication of the event to sensitive nearby receivers even if there is no present risk posed to them to assure their safety.
  - DO NOT recommence normal site activities until proper investigation, root causes analysed, and corrective actions are applied to prevent recurrence. Only after site management is satisfied shall normal activities recommence.

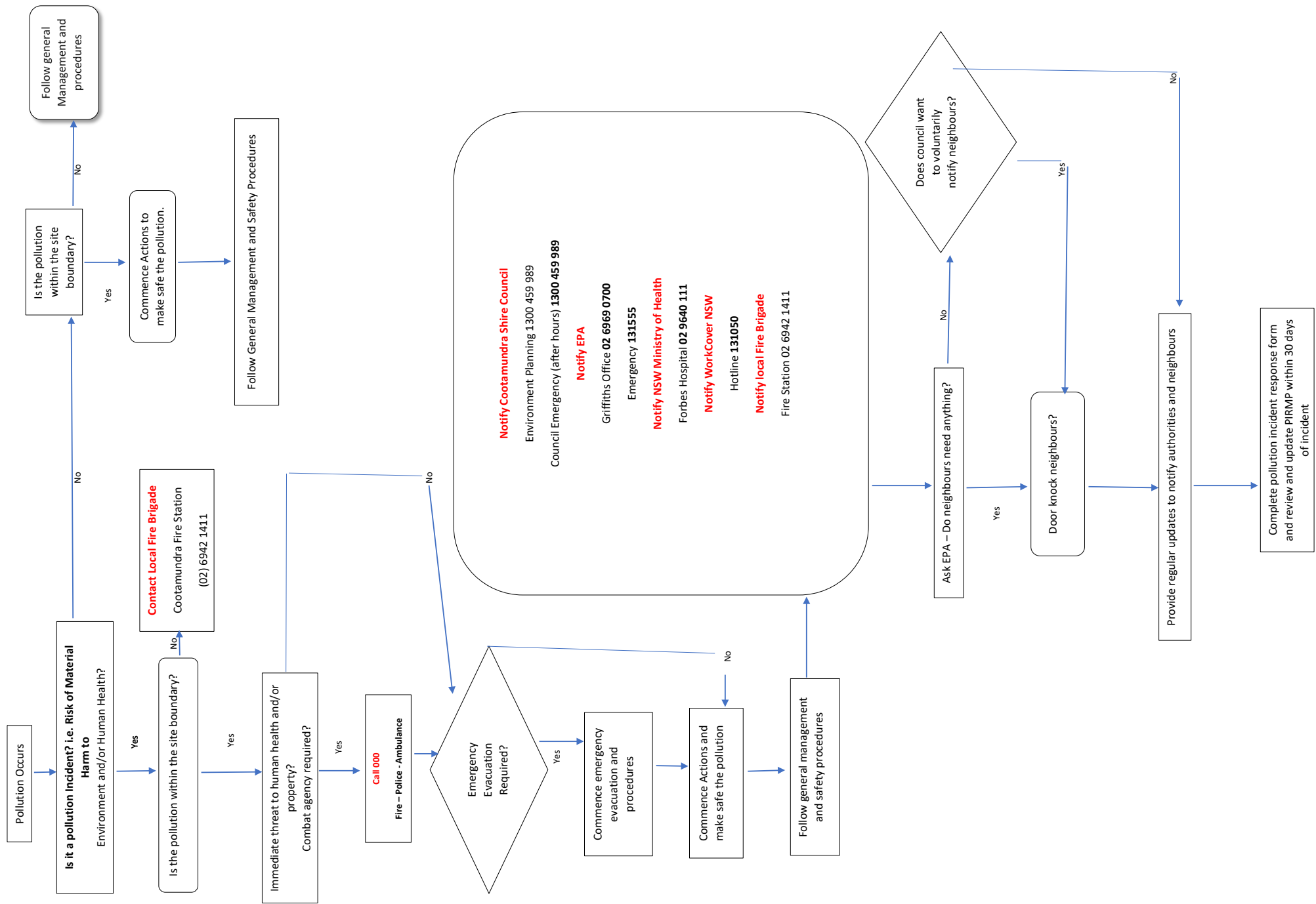
Develop a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk:

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

- In the result of a pollution incident at the facility, Molycop will work with the EPA, RFS, Forbes Shire Council & our insurers to determine the most appropriate clean-up and remediation plan.

## Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified: As per attached flow chart



Pollution Incident Response Management Plans

Identify the person/s through whom all communications are to be made: Jamie Walmsley

### Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

Training required	By Whom	Frequency
Fire first responder	Plant operators	Annually
First aid	First aider	Annually
Fire warden training	Fire warden	Annually
WHS representative training	WHS representative	Annually

### Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within 1 month of any pollution incident.

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing):

Detail the dates on which the plan was updated:

### PIRMP testing details

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)
17/9/2021	J.Neave J.Walmsley	This is a new document for recent Molycop360 ownership of the site. As a first test this PIRMP was reviewed in its entirety during its development by a desktop trial to ensure the safety equipment on site was in place and usable and persons are aware of how to use it.	This PIRMP has been adapted from that used by previous owners of the business and has therefore been updated in various minor aspects to suit the new ownership.	Approx March 2022
15/9/2022	J.Neave, K.Ritchie, S.Champness	The PIRMP was tested both in desktop form and actual tests.	Updates were made to the PIRMP contact details.	August 2023

		K.Ritche tested the sites environmental controls on the 14.9.22(water cart, pumps, tanks, check bunds, shredder extinguisher systems). We then talked though the PIRMP in a meeting on the 15.9.22.	The PIRMP is being laminated for display in the site office.	
--	--	---	--	--

#### PIRMP update details

<u>Date update occurred</u>	<u>Reason for update</u>	<u>Details of updates (nature of changes to PIRMP)</u>	<u>Date the updated version uploaded to website (if applicable)</u>
7.9.21	Review and change to Molycop	Review and change to Molycop	September 2021
21.9.22	Annual review	Updated manager contact details	26.09.22



