Pollution Incident Response Management Plan

SK tes Australia Pty Ltd

1A & 1B, 9 Birmingham Avenue Villawood, NSW 2163



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1.0 INTRODUCTION

1.1 Background

SK tes Pty Ltd (SK tes) operates a Materials Recycling Facility located at 1A & 1B, 9 Birmingham Avenue, Villawood, NSW (the Site'). The facility recycles computers and electronic assets and components. Site operations include the manual segregation, dismantling of computer and electronic equipment, functionality testing and refurbishing, and subsequent packaging and wrapping on pallets for transport off-site to a downstream processor.

SK tes is operating under an environmental pollution license (EPL 20184) under the Protection of the Environment Operations Act 1997 (POEO Act), issued by the NSW EPA. In accordance with the Protection of the Environment Legislation Amendment Act 2011 (POLEA Act), holders of EPL must comply with new legislation that requires the license holder to prepare and implement a pollution incident response management plan (PIRMP). The specific requirements for the PIRMP are set out in Part 5.7A of the POEA Act and outlined in the NSW EPA Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA, Sep 2022). The legislation requires the following:

- All holders of environment protection licenses must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection license relates.
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E); and
- If a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

This report includes the PIRMP for the SK tes facility and provides a review of the current pollution incident reporting processes as part of the Management Systems documented and implemented on the Site.

1.2 Objectives

The objectives of the study are to develop a PIRMP on behalf of SK tes to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities (Canterbury-Bankstown City Council, NSW Ministry of Health, Workcover NSW and Fire and Rescue NSW).
- Minimise and control the risk of a pollution incident at the SK tes facility by identifying the risks and development of planned actions to minimise and manage these risks; and
- Ensure that the plan is properly implemented by trained staff at the facility, identifying personnel responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

1.3 Scope of Work

The scope of work comprises the following tasks:

- Site inspection to identify potential pollution incidents that may occur on Site and result in an unacceptable risk of harm to human health or the environment.
- Review of other relevant emergency plans; and
- Development of a Pollution Incident Response Management Plan.

2.0 DESCRIPTION OF SITE OPERATIONS

2.1 Site Location

The Site is located at 1A & 1B Birmingham Avenue, Villawood, NSW. The area is in an industrial zone area within Canterbury-Bankstown City Council. The Site is surrounded by several light industrial facilities which include Refresco Australia, Merrylands Floor Coverings and Villawood Detention Centre. The closest residential area is located approximately 390 meters (m) to the North on Miowera road. The Site Location is shown in **Appendix 1**.

2.2 Description of Site Operations

The Site is used for the recycling of computer/electronic equipment (e-waste). The Site Layout is shown in **Appendix 2**. The entrance to the Site is from Birmingham Avenue to the west. Vehicles entering the Site and park in front or the side of the Warehouse. The Site is surrounded by a high chain wire fence or building wall on its boundary.

Site buildings comprise of two adjoining warehouse buildings with offices at each side of building 1A & 1B, and with concrete floors. The high ceiling roof structure consists of metal sheeting with integrated translucent roof panels positioned between two sections to allow natural light penetration while maintaining overall weather protection.

The warehouse is split into seven main areas:

- **Inbound Area** – where incoming pallets comprising computer/electronic equipment for recycling, are stored.
  The equipment is located on pallets and transferred from transport vehicles to the inbound area in the warehouse using forklift trucks.
- **Dangerous Goods Area in outside container** – where batteries are stored waiting on shipment to downstream vendors.
- **Recycle Area** – equipment dismantling area. This operation is completed manually and involves the removal of external casing from equipment using hand tools. A range of components batteries are extracted from equipment and handled as part of the recycling operation.
- **Machinery Area** – SK tes operates a baler to compact cardboard and ABS plastics, shredder to downsize plastic and to reduce storage needs and for more efficient transportation to our downstream recyclers.

- **Outbound Area** – segregated components are packaged and wrapped in plastic on the pallets. The pallets are transferred to shipping containers using the forklift truck.
- **Mobile Phone Muster Area** – mobile phones are dismantled for component recycling. The works in this area are conducted manually.
- **Computer refurbishment area** – The refurbishment of computers is also carried out at the facility. It is a separate (secure) area in 1B warehouse. This area contains several benches and desks where computer equipment is assessed and tested as required.
- **Printer consumables Processing Area** – This area is where all printer consumable parts are sorted, toner cartridges are weighted and separate into different stream to send out to our downstream vendors for further processing.

Typical hazardous components of e-waste are:

- **CRTs (no longer accepted)** – The CRTs contain a considerable amount of lead in the CRT glass in the form of lead oxide (PbO) and the CRTs are held under vacuum. The CRT intake has been minimized in 2020 as downstream processes are not available.
- **LCDs** – The LCDs are also dismantled from the electronic equipment at the Site, with the lamps from the LCD recycled at a downstream processor for metal recovery. The bulbs used for backlighting of the LCD contain mercury in the vapour form, with the mercury adhering to the phosphorous powder contained within the lamps.
- **Batteries** - most batteries encountered are sealed lithium/metal ion type batteries, with some lead/acid type batteries passing through the facility. The sealed lithium type batteries are currently packaged and transported off site for disposal via an authorised battery disposal company. All batteries are packaged such that terminals are kept apart and there is no chance of contact and potential battery discharge resulting in potential battery damage and failure of battery casing. This may lead to release of internal battery materials and the potential for personnel contact with the battery chemicals.
- **Toners** – the toners cartridges and waste toner bottles are sorted/segregated and cleaned if required. Toner cartridges are packed for recycling to approve downstream vendors.

2.3 Quality and Environmental Standards

The SK tes organization operates under several international standards, including ISO and Australian Standards. The following standards are implemented at the SK tes site at Villawood:

- ISO 14001 - 2015 (Series) – Environmental management Systems.
- ISO 45001 - 2018 (Series), Occupational Health and Safety Management Systems.
- ISO 9001 – 2015 (Series), Quality Management Systems.
- ISO 27001-2022(Series), Information Security Management Systems.
- R2v3 – Responsible Recycling
- AS5377:2013 Management of e-waste

The assessment conducted in this review included a review of the current system to identify the appropriate procedures applicable to emergency response, pollution control and incident reporting.

A review of the relevant procedures is presented in the following Table 1.

Table 1 Review of Emergency Procedures

Title	Applicability	Comments
Environmental Health & Safety (EHS) incident Statutory Reporting and Investigation Process G-OHS-010-00	Defines the statutory requirements for EHS incident reporting and procedure for internal reporting and conducting incident investigation	Applies to internal incident report and escalation to appropriate government agencies.
Emergency Response Plan (ERP) SK tes -WI-IMS-17	Provides a planned and coordinated response to emergency situations related to environmental health and safety.	Includes responsibilities, procedures, training for emergency drills for possible emergency scenarios.
Crisis Management Plan SK tes -WI-IMS-20	Assists in the response, management and recovery of a crisis directly impacting the people or operations of SK tes.	The plan includes the responsibility of the Site personnel for crisis management and the notification process that should be completed.
Environmental Impact and Aspect Assessment G-ENV-001-00	Describes the methods used to identify the environmental aspects and impacts, how to assess the significance of the aspects and impacts and how they are managed.	Copies of assessments should be included.
Emergency Preparedness and Response G-ERP-001-00	Describes the process of identifying the potential for and response to Environmental and OHS incidents and emergencies and the actions to prevent and mitigate the likely illness that may be associated.	Procedures documents specifically for emergencies such as battery contents release and clean-up; breakage of LCD mercury lamps and clean-up and CRT breakage and clean up.
Environmental Impact analysis and Significant Aspect Impact - Template G-ENV-001-01	Identifies the works activities, aspects and impacts specific to the SK tes operations at the Site in Villawood	Includes all the work activities for the operations conducted at the Site.
Hazard Identification and Risk Assessment G-OHS-002-00	Documents the identification of hazards relating to occupational health and safety, evaluate the risks associated with these hazards and ensure that appropriate actions are taken to manage the risks involved.	Only relates to Occupational and Safety Hazards.
Incident Investigation and Reporting G-OHS-010-00	Defines the responsibility and authority for the handling of investigation of Environmental and OH&S accidents, incidents and non-conformances as well as the mitigation action, the implementation and verification for corrective/preventive action.	Outlines procedures for handling investigations of environmental, OH&S incidents and non- conformances.

3.0 PIRMP

This pollution incident response management plan (PIRMP) has been prepared for SK tes facility in Villawood. The PIRMP sets out the procedure to be followed in the event of a pollution incident at the site.

3.1 What is a Pollution Incident?

In accordance with the POEO Act (section 153F), if a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement the PIRMP.

'Pollution Incident 'is defined in the dictionary of the POEO Act as:

A pollution incident means an incident or sets of circumstances during or because of which there is, or is likely to be, a leak, spill or other escape or deposit of a substance, because of which pollution has occurred, is occurring or is likely to occur. It includes an incident or sets of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

'Material Harm' is defined in section 147 of the POEO Act. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

147 Meaning of material harm to the environment

(1) For the purposes of this Part:

(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 by taking all reasonable and practicable measures to prevent, mitigate or cause good harm to the environment.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

3.2 Immediate notification

EPL licensees and anyone carrying on an activity or occupying a premises who becomes aware of a pollution incident are required to report the pollution incident **immediately** (under section 148 of the POEO Act). (Formerly the requirement was 'as soon as practicable').

'Immediate' means licensees need to report pollution incidents promptly and without delay. There is a $2 million maximum penalty for failure to notify of a pollution incident in accordance with the requirements of the POEO Act.

The duty to notify does not apply to a pollution incident involving only the emission of an odor and does not include an incident or set of circumstances involving only the emission of noise.

3.3 What action to take when a Pollution Incident occurs.

Upon the occurrence of a pollution incident refer to the Emergency Response Plan (ERP) SK tes -WI-IMS-17 to ascertain how to safely manage the incident and minimize harm to the environment

4.0 REQUIREMENT OF THE PIRMP

The legislative requirements of the PIRMP and where these requirements have been met in this document are shown in Table 2. The parts of the PIRMP that must be made publicly available are noted in Table 2.

Table 2 Legislative Requirements of the PIRMP

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
POEO Act: **Part 5.7A Duty to prepare and implement pollution incident response management plans**			
153A Duty of license holder to prepare pollution incident response management plan	The holder of an environment protection license must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the license relates.	This PIRMP in conjunction with the following SK tes documents: - Emergency Response Plan (ERP) SK tes - WI-IMS-17 - Crisis Management Plan SK tes - WI-IMS-20 - Incident Investigation and Reporting G-OHS-010-00 - Emergency Preparedness and Response G_ERP-01-00 - Work instructions and procedures.	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
153C Information to be included in plan	A pollution incident response management plan must be in the form required by the regulations and must include the following: a) the procedures to be followed by the holder of the relevant environment protection license, or the occupier of the relevant premises, in notifying a pollution incident to: i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection license or the direction under section 153B relates, and ii) the local authority for the area in which the premises to which the environment protection license or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and iii) any persons or authorities required to be notified by Part 5.7	Refer to Section 5 of this PIRMP.	P
	b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection license, or the occupier of the relevant premises, to reduce or control any pollution	Response procedures are specified in: - Emergency Response Plan (ERP) SK tes-WI-IMS-17 - Crisis Management Plan SK tes-WI-IMS-20	
	c) the procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made	Refer to Section 5 of this PIRMP.	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection license relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	A copy of the PIRMP will be kept on-site at Villawood.	
153E Testing of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.	Testing of the PIRMP will be undertaken in accordance with the regulations set out in Section 9 of this PIRMP.	
153F Implementation of plan	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.	Noted.	
Protection of the Environment Operations (General) Regulation 2009: Part 3A Pollution incident response management plans			
98B Form of plan	1) A plan is to be in written form	This PIRMP.	
	2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.	As noted, this PIRMP in conjunction with the following SK tes documents: - Emergency Response Plan (ERP) SK tes-WI-IMS-17 - Crisis Management Plan SK tes-WI-IMS-20 - Incident Investigation and Reporting G-OHS-010-00 - Emergency Preparedness and Response G-ERP-001-00 - Work instructions and procedures.	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
98C Additional matters to be included in plan	1) General The matters required under section 153C (d) of the Act to be included in the plan are as follows: a) a description of the hazards to human health or the environment associated with the activity to which the license relates (the relevant activity),	Refer to Section 7 of this PIRMP.	
	b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Refer to Section 7 of this PIRMP.	
	c) details of the pre-emptive action to be taken to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity	Refer to Section 7 of this PIRMP	
	d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity	Refer to Section 8 of this PIRMP	
	e) the maximum quantity of any pollutant that is likely to be stored or held at locations (including underground tanks) at or on the premises to which the license relates	Refer to Section 8 of this PIRMP	
	f) a description of the safety equipment or other devices that are used to minimize the risks to human health or the environment and to contain or control a pollution incident	Refer to: - Emergency Response Plan (ERP) SK tes-WI-IMS-17 - Emergency Preparedness and Response G-ERP-001-00	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
	g) the names, positions and 24-hour contact details of those key individuals who: i) are responsible for activating the plan, and ii) are authorised to notify relevant authorities under section 148 of the Act, and iii) are responsible for managing the	Refer to Section 5 of this PIRMP	
	h) the contact details of each relevant authority referred to in section 148 of the Act	Refer to Section 5 of this PIRMP	P
	i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the license relates or where the scheduled activity is carried on	Refer to Section 5 of this PIRMP.	P
	j) the arrangements for minimizing the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Refer to the following procedures: - Emergency Response Plan (ERP) SK tes-WI-IMS-17 - Emergency Preparedness and Response G-ERP-001-00	
	k) a detailed map (or set of maps) showing the location of the premises to which the license relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises	Refer to Figure 1 and Figure 2 of this PIRMP.	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
	l) 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	Refer to. - Emergency Response Plan (ERP) SK tes-WI-IMS-17 - Emergency Preparedness and Response G-ERP-001-00	
	m) the nature and objectives of any staff training program in relation to the plan	Training for the PIRMP will be conducted in conjunction with ERP Training,	
	n) the dates on which the plan has been tested and the name of the person who carried out the test	Refer to Section 9 of this PIRMP	
	o) the dates on which the plan is updated	Refer to Section 9 of this PIRMP.	
	p) the way the plan is to be tested and maintained.	Refer to Section 9 of this PIRMP.	
	2) Trackable waste transporters	Not applicable.	
98D Availability of plan	1) A plan is to be made readily available: a) to an authorised officer on request, and	The PIRMP will be made readily available to an authorized EPA officer on request.	
	b) at the premises to which the relevant license relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.	The PIRMP will be kept onsite at Villawood.	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
	2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, b) if the person does not have such a website—by providing a copy of the plan, without charge, to any person who makes a written request for a copy.	The PIRMP is publicly available on SK tes's website. www.sktes.com	
	3) Subclause (2) applies only in relation to that part of a plan that includes the information required under: a) section 153C (a) of the Act, and b) clause 98C (1)(h) and (i) or (2)(b) and (c) (as the case requires	The publicly available PIRMP includes those sections referred to in the Act and Regulation (refer to the right-hand column of this Table.	
	4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1)	Noted.	
98E Testing of plan	1) The testing of a plan is to be carried out in such a manner as to ensure that 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.	Refer to Section 9 of this PIRMP	

Legislation	Requirement	Where this requirement is met	Must be Publicly Available?
	2) Any such test is to be carried out: a) routinely at least once every 12 months, and b) within 1 month of any pollution incident occurring in the course of an activity to which the license relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.	Refer to Section 9 of this PIRMP	

5.0 POLLUTION INCIDENT NOTIFICATION PROTOCOL

This Section of the PIRMP sets out the procedure to be followed by SK tes in notifying the authorities incident to authorities.

5.1 Whom do you notify?

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

Upon receiving notification, the Main Incident Controller must determine the level of the incident. If the event is a pollution incident (refer to section 3.1), the Main Incident Controller must then immediately (that is, promptly and without delay), provide notification of the pollution incident to all the authorities identified in Table 3 in the order as listed.

Table 3 - Notification to Relevant Authorities

Contact	Phone Number
1. The EPA Environment Line	131 555
2. The Ministry of Health via the Westmead Hospital	02 9845 5555
3. The Workcover Authority	13 10 50
4. Canterbury-Bankstown City Council	02 9707 9999
5. Fire and Rescue NSW	000

Whenever an incident notification is made. All five authorities MUST be contacted, for example:

- If the initial call is to Fire and Rescue on 000, due to an immediate threat to life and property, the other four authorities must still be contacted: or

Notification is not necessary if the operators of the facility know that all relevant authorities are already aware of the incident (section 151 POEO Act).

If, at the time of making the notification, it is understood that some of these authorities do not need to attend the incident, such advice may be provided. However, all information must still be provided, including all the information held at the site regarding the incident to each authority. It is the responsibility of each authority to decide whether they need to attend the incident.

Where authorities decide not to attend, the incident notification enables each authority to respond to enquiries about the incident and provides them with initial information if the incident escalates or their involvement in managing the incident is required at some later stage.

5.2 What information must be provided?

Sufficient details of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

- the time, date, nature, duration and location of the incident.
- the location of the place where pollution is occurring or is likely to occur.
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known.
- the circumstances in which the incident occurred (including the cause of the incident, if known); and
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

Any information that is not known when the incident is notified must be provided immediately once it becomes known.

5.3 Coordination with authorities

In the event of an immediate threat to life and property, the Main Incident Controller will coordinate the incident. SK tes will act under instruction from emergency services and take any action directed to combat pollution caused by the incident.

Following initial notification, the SK tes person through whom all communications are to be made to coordinate with authorities is the EHS Officer. Contact details are provided in Table 4.

Table 4 NPC Person to Communicate with Authorities

Roles	Name	Position	Phone Number
Main Incident Controller (1st person)	Thomas Eun	General Manager	61 448 462 002
Main Incident Controller (2nd person)	Ridvan Gultekin	ANZ Operation Manager	0435 923 969

6.0 NOTIFYING A POLLUTION INCIDENT TO NEIGHBOURS

This section of the PIRMP sets out the procedures to be followed by SK tes in notifying a pollution incident to the owners or occupiers of premises in the vicinity of SK tes in the locality of Villawood.

6.1 Wider Notification

The EPA can formally direct SK tes to notify others. If so directed, SK tes would contact commercial, industrial and residential neighbors to inform them of the circumstances of the incident and what action is being taken in response to it. It will be an offence not to comply with such a direction.

The EPA may advise SK tes of the extent of notification required. If not, SK tes would determine the extent of who to contact based on the nature of the pollution incident and the conditions at the time (for example, the type of pollutant, prevailing winds, magnitude of incident, and possible impacts).

6.2 Community communication mechanisms

In the event that the pollution incident is being coordinated by emergency services, communications would be under the control of emergency services. Emergency services can send SMS messages to defined catchment areas to alert and advise the community if required. SK tes (through the person nominated in Table 4) would work with emergency services to provide communications assistance and support, including direct door knocks if they were required.

A list of immediate neighbors and their contact details are provided in the Emergency Response Plan SK tes -WI-IMS-17 – Attachment II

If communication is not coordinated by emergency services, notification to the owners or occupiers of premises in the vicinity of the Villawood would be coordinated by the person nominated in Crisis Management Plan SK tes -WI-IMS-20, being the Crisis Commander.

The communication response to be used in the event of a pollution problem would depend on the circumstances of the event, and any direction that may be provided by the EPA.

A media liaison officer is available to be contacted 24/7 if a media release is required. Media updates could be provided on an ongoing basis depending on the incident.

6.3 Information to be provided.

In the event of a pollution incident, communication to the community would include specific information to minimize the risk of harm. For example, this may include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants.

The information to be provided would be dependent on the nature and circumstances of the event.

7.0 HAZARDS

Table 5 identifies:

- the main hazards to human health or the environment associated with the licenced activity at the Site.
- the likelihood of any such hazards occurring, including conditions or events that could, or would, increase the likelihood of hazards occurring at the site; and
- some of the pre-emptive actions that are undertaken to minimise or prevent any risk of harm to human health or the environment.

Table 5 Main Hazards and Pre-Emptive Actions

Main Hazards	Likelihood of the hazard occurring	Conditions or events that could increase the likelihood of the hazard	Pre-emptive Actions
Spillage of Chemicals	Low	- Breakage of bulbs from LCDs and CRT glass held under vacuum, during manual dismantling. - Batteries stored incorrectly. - Misuse of forklift resulting in materials falling from forklift. - Break-in and damage. Note: the magnitude of incident consequences would not result in an incident impact beyond the immediate area of the release. The likelihood of offsite impact from chemical spill incidents at the SK tes Villawood site is negligible.	- Training of personnel dismantling computer/ electronic equipment. - Batteries are packaged such that terminals are kept apart and there is no chance of contact and potential battery discharge resulting in potential battery damage and failure of battery casing, which may result in release of internal battery materials. - Personnel protective equipment (PPE) such as eyewear is available in this area for the protection of personnel. - Spill kit is available in segregation area. - Regular testing and maintenance of site equipment

Main Hazards	Likelihood of the hazard occurring	Conditions or events that could increase the likelihood of the hazard	Pre-emptive Actions
Fire: - From sparking batteries	Moderate	- Improper storage or packing of Li-ion batteries	- Safe packing of Li-ion Batteries - Discharging of Li-ion batteries - Storage outside warehouse in containers. - Fire extinguishers and hose reels - Fire hydrants installed throughout the site (for Fire Brigade use only).
Explosion/Fire: - From toner dust	Moderate	- Dust cloud and naked flame or sparking	- Earthling of equipment - Good housekeeping - Keeping site clean of dust build-up. - Earthling of workers - Regular maintenance filter system. - Fire extinguishers and hose reels - Fire hydrants installed throughout the site (for Fire Brigade use only).
Oil or hydraulic fluid spill or leak: - From forklift trucks involved in loading/ unloading	Low	- Poor maintenance of mobile equipment. - Accident during maintenance. Note: the magnitude of incident consequences would not result in an incident impact beyond the immediate area of the release. The likelihood of offsite impact from oil or hydraulic fluid spill incidents at the SK tes Villawood site is negligible.	- Regular testing and maintenance of site equipment. - Pre-start checks on machinery. - Controlled refuelling process. - No fuel stored on site except minimal amounts for compressor.
Poor waste management	Low	- Build-up of waste onsite. - Wastes incorrectly. identified.	- Clearing of rubbish and waste during loading and unloading activities. - A waste company with waste disposal licences is engaged to remove general waste.
Spillage of process wastewater	Low	- Damage to storage IBC - Note: the IBC are stored on secondary bunding negligible.	- Stored on secondary bunding

8.0 POTENTIAL POLLUTANTS

Table 6 provides:

- an inventory of potential pollutants at the Villawood facility.
- the maximum quantity of any pollutant that is likely to be stored or held.

Table 6 Inventory of Potential Pollutants

Potential Pollutant	Maximum Quantity	Comments
Lead oxide in CRT glass	500kg	CRT glass is held under vacuum kept as whole units
Mercury in the LCD bulbs	200mg	2.2 to 3.0 mg per contained in bulb
Wet Lead acid in single battery for forklift (ICE forklift)	20 L	6 Forklift trucks with Lead Acid battery.
Batteries Lead Acid Sealed	10000kg	Sealed lead acid battery from Server racks
Hydraulic fluid stored in forklifts, machinery	100L	Contained equipment such as gearbox
Li-ion batteries	50000kg	Packaged for shipment to downstream vendors
Process wastewater	4000L	Brine- li-ion battery soaking IBC

9.0 TESTING THE PLAN

The PIRMP will be tested:

- routinely at least once every 12 months; and
- within one month of any pollution incident occurring.

The objective of testing is to assess whether the information included in the PIRMP is accurate and up to date and whether the PIRMP is capable of being implemented in a workable and effective manner.

The routine testing will be a desktop/scenario assessment. During the desktop/scenario assessment, the PIRMP will be reviewed, and all components of the plan will be checked for effectiveness:

- contact details will be checked to ensure they are up to date.
- procedures in the PIRMP will be checked to ensure they are workable.
- learnings from practical site exercises will be transferred to the PIRMP where applicable; and
- the effectiveness of training will be assessed.

The site does not have point emission or chemical storage. Hence, the primary risk is associated with a facility fire. The PIRMP will be tested during fire drills.

The date on which the plan is tested, and the name of the person who carries out the test, will be recorded. The results of the test will be documented. If the PIRMP is updated, the date on which the plan is updated will also be recorded in Revision History of this document.

10.0 REFERENCES

- Australian Information Industry Association (AIIA) E-SIG /Product Stewardship Australia (PSA) Interim Industry Standard: collection, transport and recycling of end of life (EOL) televisions and computers.
- ISO 14001- 2015 (Series) – Environmental management Systems, International Standards Organisation, Central Secretariat, Geneva, Switzerland.
- ISO 9001 – 2015 (Series), Quality Management Systems, International Standards Organisation, Central Secretariat, Geneva, Switzerland.
- ISO 45001 - 2018 (Series) Occupational health and Safety Management Systems, International Standards Organisation, Central Secretariat, Geneva, Switzerland.
- ISO 9001 – 2015 (Series), Quality Management Systems, International Standards Organisation, Central Secretariat, Geneva, Switzerland.
- Work Health and Safety Act 2011 (WHS Act)
- Work Health and Safety Regulation 2017
- Protection of the Environment Operations Amendment Act 2011
- Protection of the Environment Operations (General) Regulation 2009
- NSW EPA Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA, September 2022)

CHANGE HISTORY

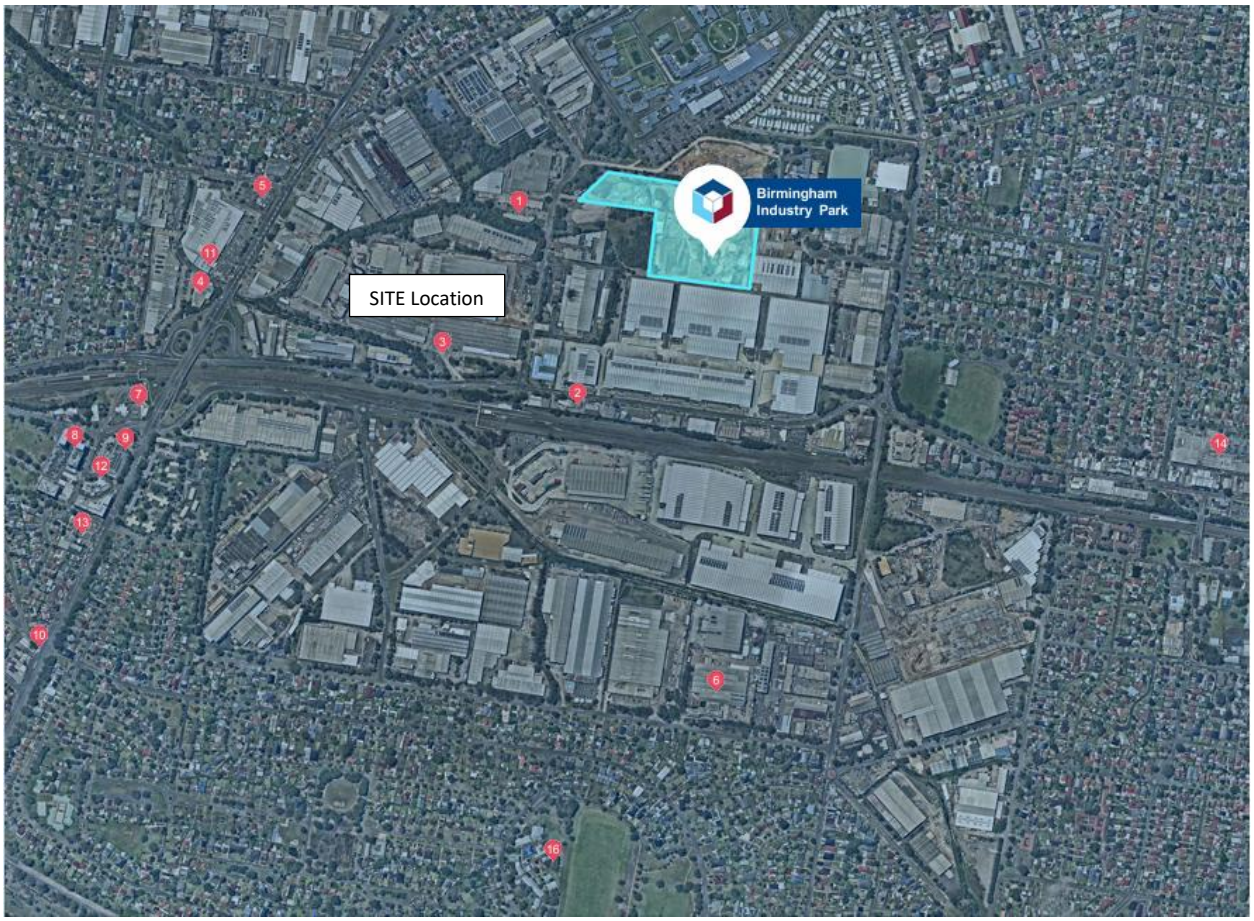
Revision no.	Description of Amendments	Date of Issue
0		
1	Updated figure 2 Changed Incident Main Controller. Removed documentation in Appendix B	31 May 2016
2	Updated Figure 2 Updated table 6	31 May 2017
3	Updated Table 4 Updated Table 6	28 May 2018
4	2.2 Site Operations Updated Updated Table 4 Updated Table 6	20 May 2019
5	Reviewed to include PIRMP Guidelines published March 2020 Updated Table 1 Updated Table 5 Updated Table 6 Updated Site Map Appendix A Updated Testing Plan	20 May 2020
6	Section 1.1: added “functionality testing and refurbishing.” Section 2.2: added “Machinery area” section Added section 3.3	15 Feb 2021

Revision no.	Description of Amendments	Date of Issue
	Updated contact details in Table 4 Section 6.2: added “list of immediate neighbors.” paragraph. Updated Table 5 Change appendix numbering.	
7	Update site plan	1-June-2022
8	Change of procedure and change site plan	30-Nov-2023
9	Change of company logo, site plan, document number	30-Apr-2024
10	Change of site plan and update of neighbors	31-May-2024
11	Change of GM, update site plan	30-May-2025
12	Change of GM	04-July-2025
13	Updated new NSW site location. Last drill 20-Jan-26. Next drill on 15 Oct-26 at new site	22-Sep-2026

APPROVAL

Author	Approved By	Effective/ Reviewed Date
Jimmy Sia	Thomas Eun	22-Sep-2026

APPENDIX 1: SITE LOCATION PLAN



APPENDIX 2: SITE LAYOUT

