



Pollution Incident Response Management Plan (PIRMP)

Maitland Resource Recovery Facility

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 6116

Approved by: Michelle Lindsay

Signature:

Position/Title: Operations Manager Waste Services

Date: 4 December 2023

Purpose

The purpose of the Pollution Incident Response Management Plan (PIRMP) is to:

- To protect community health and wellbeing by providing timely and clear communication in the event of a pollution incident at the Maitland Resource Recovery Facility (MRRF) with staff at the facility, the NSW EPA, other relevant authorities (including Worksafe NSW, Fire and Rescue NSW and NSW Ministry of Health) and the neighbouring community who may be affected by the pollution incident
- Minimise and control the risks of a pollution incident occurring at the MRRF by identifying hazards, assessing risks and developing mitigative actions for each identified risk
- Allow for a swift response and actions in the event of a pollution incident to minimise its impacts
- Ensure it can be effectively activated when required, by identifying persons responsible for implementing the plan
- Ensure it is regularly updated for accuracy and currency and tested for suitability and availability of adequately trained personnel.

Introduction

Maitland City Council (MCC) owns and operates the Maitland Resource Recovery Facility (MRRF) located at 109 and 110 Mt Vincent Rd, East Maitland. The MRRF was commissioned in 1993 with approximately 1.7 million cubic metres of waste landfilled to date. The MRRF encompasses a size of 69.37 ha and is zoned SP1, Special Uses.

Activities undertaken at the MRRF include landfilling of waste, collection or segregation and storage of various recyclables and vegetation, operation of a Community Recycling Centre, landfill gas capture and flaring and leachate and stormwater management. The operations of the site are subject to the requirements of the Environment Protection Licence 6116 and DA consent conditions.

MCC developed this site-specific PIRMP for its MRRF in accordance with the requirements of the Protection of the Environment Legislation Amendment Act 2011 and the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plan) Regulation, 2012.

Under this legislation, the PIRMP must clearly document pollution risks, communication procedures to authorities and the community regarding pollution incidents and testing and training for pollution response. In the event of a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be activated.

The PIRMP will be used by all staff based at the MRRF and involved in the day to day operation of the waste management facility and clearly defines the requirements of MCC staff to report and respond to pollution incidents in an efficient and timely manner.

Environment Protection Licence (EPL) Details

Name of licensee: Maitland City Council
(including ABN) ABN 11 596 310 805

EPL number: 6116

Premises name and address: Maitland Resource Recovery Facility
109 and 110 Mt Vincent Rd, East Maitland NSW 2323

Company or business contact details
Name: Michelle Lindsay
Position or title: Operations Manager Waste Services
Business hours contact number/s:
After hours contact number/s:
Email:

Website address: www.maitland.nsw.gov.au

Scheduled activity/activities on EPL: Waste disposal (application to land)
Waste processing (non-thermal treatment)
Waste Storage

Fee-based activity/activities on EPL: Waste disposal by application to land
Non-thermal treatment of general waste
Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste
Waste storage – other types of waste
Waste storage – waste tyres

Pollution incident – person/s responsible

PIRMP activation
Name of person responsible: Paul Seagrave/Shawn Southwick
Position or title: Site Supervisors
Business hours contact number:
After hours contact number/s:
Email:

Pollution incident – person/s responsible, continued

Notifying relevant authorities
Name of person responsible: Michelle Lindsay
Position or title: Operations Manager Waste Services
Business hours contact number/s:
After hours contact number/s:
Email:

Managing response to pollution incident
Name of person responsible: Leigh Weldon
Position or title: Coordinator Resource Recovery and Waste Disposal
Business hours contact number/s:
After hours contact number/s:
Email:

Notification of relevant authorities

Police / Fire / Ambulance	Contact number:	000
NSW EPA	Contact number:	131 555
SafeWork NSW	Contact number:	131 050
Fire & Rescue East Maitland	Contact number:	4934 7497
Maitland City Council	Contact number:	4934 9700
Rural Fire Service East Maitland (if required)	Contact number:	4015 0000
HAZMAT (Newcastle Fire Station) (if required)	Contact number:	4927 2535
Hunter New England Public Health Unit (if required)	Contact number:	4924 6477
Police, Maitland (if required)	Contact number:	4934 0200

1. 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.
2. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the order shown in Table above. Fire and Rescue NSW need to be notified even if a combat agency is not required. The 24-hour hotline for each authority is given when available.
3. Immediate verbal notifications must be followed by notification in writing to the EPA within 7 days of the date on which the incident occurred.
4. Notify Council's Manager Workplace Health and Safety to advise SafeWork NSW.
5. Any subsequent information must be provided to the above agencies immediately as they become available and must be followed up with written notification to the EPA.

Notification of neighbours and the local community

Pollution incidents, deemed by MCC or as directed by the EPA, to require community notification will trigger activation of Council's communication plan. Council's Operations Manager Waste Services will ensure that the neighbouring community impacted by the incident are notified via the following:

- Door knocking of all households severely affected by the pollution event
- Letterbox drop to households affected by ongoing impacts from a pollution event
- MRRF website dashboard
- Social media (Facebook).

The impacted or potentially impacted owners and occupiers of neighbouring premises will be provided with early warning and regular updates regarding the incident occurring at the MRRF to ensure that they are aware of the incident and what precautions they need to take.

Where a resident is not home at the time of door knocking information will be placed under the front door to ensure they receive the information on their arrival and are made aware of the pollution incident and the precautionary measures that should be taken.

At the time of door knocking and in other forms of notification, residents will be advised that MCC will place a notice on its website dashboard and Facebook once the incident is no longer of concern and no longer a risk to theirs or livestock health and that regular updates will be provided via these media platforms.

In addition to residents the following will also be notified:

- Rural Fire Service located opposite the MRRF: 4015 0000 (during business hours)
- Bloomfield Mine: 4930 2680 (Community and blasting 24hr hotline)

Where the incident is likely to impact on the community, residents will be advised of the following precautions:

- air pollutants: close windows and doors, stay inside and do not use air conditioning units
- water pollution: do not allow human or stock water to be sourced from downstream dams and creeks.

Description and likelihood of hazards and pre-emptive actions to be taken

The following environmental hazards associated with operating the MRRF, the resulting risk and their likelihood of occurring have been identified:

Hazard	Risk	Likelihood of occurring	Pre-emptive Actions to be taken
Storage of Hazardous materials	Leaking paint tins not stored in bunded stillage resulting in spillage on CRC floor	Possible	<ul style="list-style-type: none"> • Provide supervision at the CRC at all times to ensure paint tins are stored in bunded stillages • Ensure sufficient paint stillages are available by weekly updating the inventory register • Availability of spill kit and absorbent material
	Used oil tank and surrounding bund failure resulting in oil discharging into drainage channel	Unlikely	<ul style="list-style-type: none"> • Undertake daily inspections • Provide supervision at the CRC at all times • Regularly pump out used oil tank to keep levels low
	Lead acid batteries not stored on bunded pallet resulting in acid leaking onto CRC floor	Possible	<ul style="list-style-type: none"> • Provide supervision at the CRC at all times to ensure batteries are stored on bunded pallets • Availability of spill kit and absorbent material
Leachate	Leachate escape into groundwater or surface water resulting in contamination of water	Possible	<ul style="list-style-type: none"> • Leachate pond is clay lined to minimise risk of leachate leaking into underlying groundwater • Leachate pond is inspected daily and when weather conditions permit irrigation system is activated with the aim of keeping leachate levels at a minimum at all times • Quarterly and annual groundwater and surface water monitoring is undertaken

Hazard	Risk	Likelihood of occurring	Pre-emptive Actions to be taken
			<p>for early detection of potential contamination</p> <ul style="list-style-type: none"> • Additional monitoring of surface water is undertaken after storm events that cause the leachate pond and sediment pond 2 to overflow. • Availability of 2 x storage dams on the western side of Mt Vincent Rd to capture overflow from sediment pond 2 for settlement and dilution before discharge to the floodplain of Wallis Creek.
Landfill gas	Emigration of landfill gas to neighbouring properties causing risks of fire or explosion		<ul style="list-style-type: none"> • Monthly surface monitoring of methane on site for the early detection of elevated levels • Monthly surface monitoring off site at the RFS located at 110 Mt Vincent Road • Installation of gas extraction and landfill gas flaring system to minimise the volume of landfill gas
	Presence of methane within the explosive range resulting in explosions		<ul style="list-style-type: none"> • Monthly surface monitoring of methane on site for the early detection of elevated levels • Monthly surface monitoring off site at the RFS located at 110 Mt Vincent Road • Installation of gas extraction and landfill gas flaring system to minimise the volume of landfill gas • Smoking on site not permitted
Asbestos	Receival of asbestos contaminated materials not wrapped in accordance with guidelines resulting in exposure to asbestos dust	Unlikely	<ul style="list-style-type: none"> • 24 hr notice is required. Upon booking customer will be advised of presentation guidelines • Information on correct presentation guidelines is available on Council's website and the MRRF. • All asbestos loads are inspected in accordance with SWMS "Receival and Disposal of Asbestos Waste" Standard Operating Procedure "Asbestos Management and Disposal at the Maitland Resource Recovery Facility". • Asbestos disposal occurs in a separate area • Asbestos loads are covered immediately with VENM after unloading • Asbestos dust monitoring is completed annually
	Illegal disposal of asbestos material in	Possible	<ul style="list-style-type: none"> • Supervision of all unloading areas to minimise the receival of unacceptable

Hazard	Risk	Likelihood of occurring	Pre-emptive Actions to be taken
	the landfill resulting in exposure to asbestos dust		material including asbestos not presented in accordance with guidelines
Fire	Fire in the landfill resulting in air pollution and human exposure to toxins	Almost certain	<ul style="list-style-type: none"> • Application of daily cover at the end of each day • Minimising landfill face • Availability of watercart to respond quickly to spot fires • Availability of landfill compactor and traxcavator to spread waste if required to allow more efficient application of water
	Fire in the vegetation storage area resulting in air pollution	Possible	<ul style="list-style-type: none"> • All vegetation is removed from the site monthly to minimise stockpile sizes • Availability of watercart to respond quickly to spot fires
	Fire in the tyre storage area resulting in air pollution and human exposure to toxic fumes	Unlikely	<ul style="list-style-type: none"> • Tyres are regularly removed to keep stockpile sizes to a minimum. • Tyre stockpiles do not exceed 5 tonnes • Availability of watercart to respond quickly to spot fires
	Fire of landfill gas flare causing air pollution	Unlikely	<ul style="list-style-type: none"> • Keep grass around landfill gas flare low • Regular inspection of the gas flare by LMS • Ability to remotely switch off the landfill gas flare
Refuelling of plant and equipment	Diesel spill during refuelling of plant and equipment resulting in contamination	Possible	<ul style="list-style-type: none"> • Full supervision during the entire refuelling process • Availability of spill kit and absorbent material
Illegal receipt of hazardous waste	Illegal receipt of chemicals for which the facility is not licenced resulting in human exposure	Possible	<ul style="list-style-type: none"> • Supervision of all unloading areas • Availability of bycatch storage cabinets for secure temporary storage of chemicals not accepted as part of the CRC
	Illegal receipt of medical or cytotoxic waste resulting in human exposure	Unlikely	<ul style="list-style-type: none"> • Supervision of all unloading areas

Inventory of pollutants

The following table lists the potential pollutants stored at the facility and the estimated storage quantity:

Location/Tank	Max. quantity	Contents	Comments
CRC – waste oil tank	2,000 litres	Waste engine oil	
CRC	2,000 kg	Water based paint	Stored in IBC's
CRC	2,000 kg	Oil based paint	Stored in IBC's
CRC	1,000 kg	Waste oil (other)	Stored in IBC's
CRC	160 litres	Packaged acids	Stored in Dangerous Goods Safety Cabinet
CRC	160 litres	Packaged alkalis	Stored in Dangerous Goods Safety Cabinet
CRC	160 litres	Packaged oxidizers	Stored in Dangerous Goods Safety Cabinet
CRC	250 litres	Packaged flammable liquids	Stored in Dangerous Goods Safety Cabinet
CRC	250 litres	Packaged Toxic chemicals	Stored in Dangerous Goods Safety Cabinet
CRC	4,000 kg	Lead acid batteries	Stored on bunded pallets
Store	50 litres	Diesel fuel	Stored in jerry cans

Safety equipment

Safety Data Sheets

Safety Data Sheets (SDS) for all chemicals stored on site are kept in the site office. The Site Supervisor also has access to the Chemwatch database for accessing any SDS's for pollutants or future chemicals if required. SDS are reviewed every six months.

Safe Work Method Statements

Safe Work Method Statements (SWMS) are stored in hardcopy at the site and electronically in Council's electronic management system. SWMS are reviewed annually.

Plant

A water cart is available onsite to combat minor fire events. Specialised landfill plant including a compactor and traxcavator are also located at the MRRF on a permanent basis and can be used to manage or assist in the management of certain incidents such a fire or constructing or strengthening diversion drains or fire breaks.

Spill Kits

Two spill kits containing an arrangement of absorbent material are available on site. One is located near the administration building and one at the Community Recycling Centre.

Fire Extinguishers and fire blankets

Fire blankets are available in the lunchroom, gatehouse and Community Recycling Centre. Fire extinguishers are available in all Plant, on the wall outside the office, outside the gatehouse, inside the gatehouse and at the Community Recycling Centre.

General

Signs and temporary fencing will be placed around pollution incidents where applicable to ensure human contact is prevented until such time as the polluted material can be disposed of appropriately and the area is considered safe.

Communicating with neighbours and the local community

Pollution incidents, deemed by MCC or as directed by the EPA, to require community notification will trigger activation of Council's communication plan. Council's Waste Services Coordinator will ensure that the neighbouring community impacted by the incident are notified via the following:

- Door knocking of all households affected or could be affected by the pollution event
- Letter box drops to the above properties
- Maitland City Council website and
- Social media including twitter and Facebook.

The impacted or potentially impacted owners and occupiers of neighbouring premises will be provided with early warning and regular updates regarding the incident occurring at the MRRF to ensure that they are aware of the incident and what precautions they need to take.

Where a resident is not home at the time of door knocking information will be placed under the front door to ensure they receive the information on their arrival and are made aware of the pollution incident and the precautionary measures that should be taken.

At the time of door knocking and in other forms of notification, residents will be advised that MCC will place a notice on its website and facebook once the incident is no longer of concern and no longer a risk to theirs or livestock health and that regular updates will be provided via these media platforms.

In addition to residents the following will also be notified:

- Rural Fire Service located opposite the MRRF: 4015 0000 (during business hours)
- Bloomfield Mine: 4930 2680 (Community and blasting 24hr hotline)

Where the incident is likely to impact on the community, residents will be advised of the following precautions:

- air pollutants: close windows and doors, stay inside and do not use air conditioning units
- water pollution: do not allow human or stock water to be sourced from downstream dams and creeks.

Minimising harm to persons on the premises

If staff and customers of the MRRF are required to evacuate the site, the following procedures will be followed:

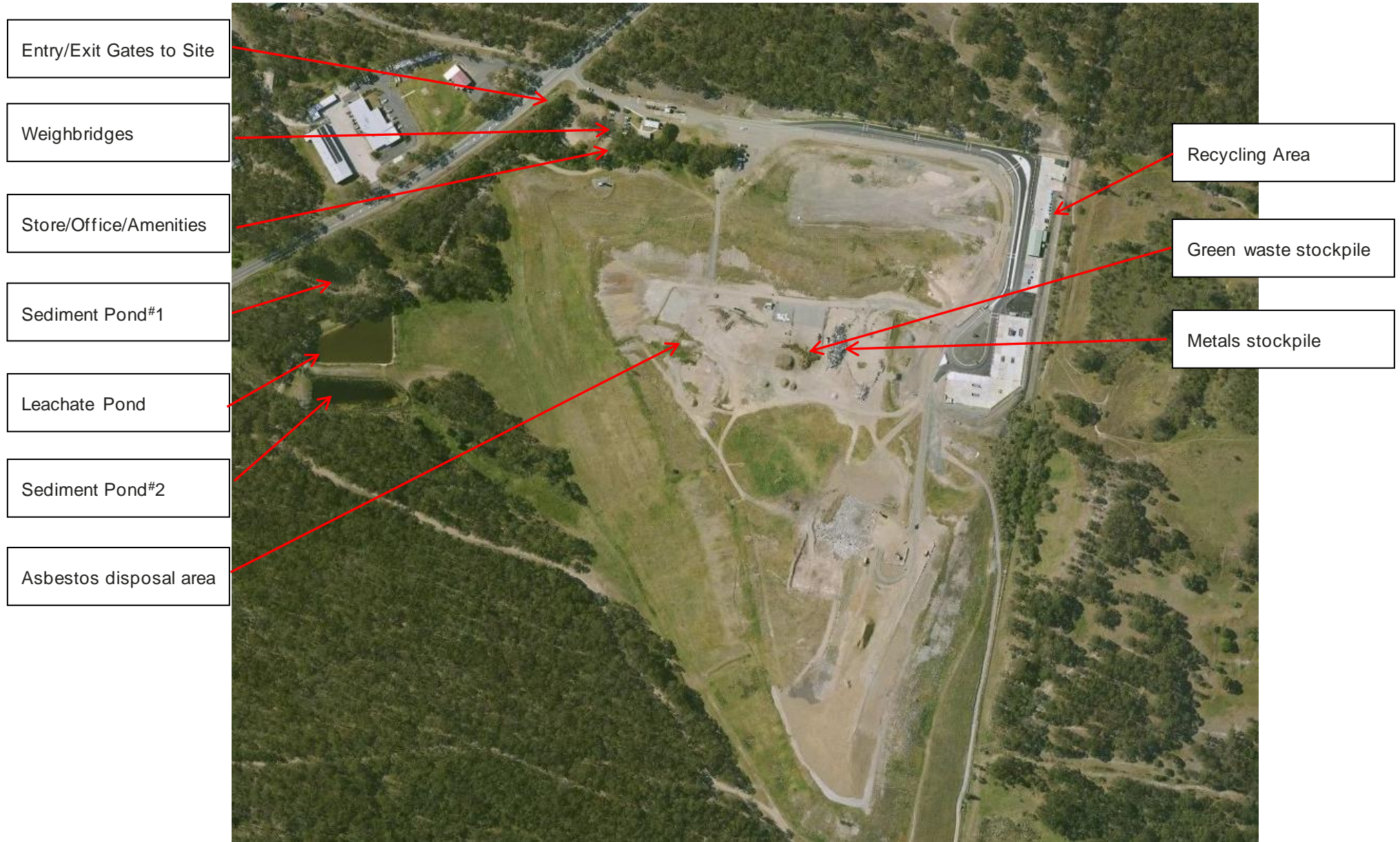
1. Site Supervisor will close the incoming entry gate to ensure no further vehicles are able to enter the site.
2. Site Supervisor will advise staff members at tip face, recycling area and CRC of the need to evacuate the site via UHF radio.
3. Staff member in the gatehouse will open the boom gate to allow for smooth exit of customers from the facility.
4. Staff member at tip face to instruct all vehicles at the tip face to leave the site via the weighbridge immediately. Where it is not safe to use the main entry road the alternate assembly point must be utilised.
5. In the event, contractors are working on site, the staff member in the gatehouse will advise them to leave the site immediately. This can be done either using mobile or UHF communication. All visitors to the site are required to sign in and provide mobile phone contact details.
6. All staff must assemble at the Assembly Point immediately outside the front entry gates.

Maps

Area surrounding Mount Vincent Rd Waste Management Centre



Mount Vincent Rd Waste Management Centre



Actions to be taken during or immediately after a pollution incident

Incident	Response/actions
Leaking paint tins not stored in bunded stillage resulting in spillage on CRC floor	<ul style="list-style-type: none"> • Fence off spill area to prevent public from entering until cleaned up • Clean up spilled paint immediately using rags or absorbent material • Dispose of absorbent material/rags in the landfill • Complete incident report via Vault
Used oil tank and surrounding bund failure resulting in oil discharging into drainage channel	<ul style="list-style-type: none"> • Use absorbent sausages contained in spill kit to prevent oil from entering the drainage channel • Fence off area to prevent public from entering • Contact Cleanaway immediately to arrange emergency pump out of oil tank • Use absorbent material to clean up spilled oil • Dispose of clean up material in landfill • Complete incident report via Vault
Lead acid batteries not stored on bunded pallet resulting in acid leaking onto CRC floor	<ul style="list-style-type: none"> • Fence off to prevent public from entering • Use absorbent material to clean up spilled oil • Dispose of clean up material in landfill • Complete incident report via Vault
Leachate escape into groundwater or surface water resulting in contamination of water	<ul style="list-style-type: none"> • Arrange for additional monitoring • Notify EPA
Emigration of landfill gas to neighbouring properties causing risks of fire or explosion	<ul style="list-style-type: none"> • Seal area where elevated methane levels are encountered with a clay plug • Complete incident report via Vault • Complete weekly monitoring until levels normalise • Notify EPA
Presence of methane within the explosive range resulting in explosions	<ul style="list-style-type: none"> • Prevent any equipment or plant with the potential to generate sparks from operating in the vicinity to the area where the explosive levels are encountered
Receival of asbestos contaminated materials not wrapped in accordance with guidelines resulting in exposure to asbestos dust	<ul style="list-style-type: none"> • Advise customer of correct presentation guidelines • All asbestos loads are managed in accordance with SWMS "Receival and Disposal of Asbestos Waste" Standard Operating Procedure "Asbestos Management and Disposal at the Maitland Resource Recovery Facility". • Use watercart to escort customer to asbestos unloading area • Provide PPE to customer if required • Wet load prior to unloading • Cover material immediately after unloading • Do not permit unloading in very windy conditions • Complete incident report via Vault
	<ul style="list-style-type: none"> •

Incident	Response/actions
<p>Illegal disposal of asbestos material in the landfill resulting in exposure to asbestos dust</p>	<ul style="list-style-type: none"> • All asbestos loads are managed in accordance with SWMS "Receival and Disposal of Asbestos Waste" Standard Operating Procedure "Asbestos Management and Disposal at the Maitland Resource Recovery Facility". • Once the asbestos is identified the area will be made secure and the public excluded • The asbestos will be immediately covered with VENM • Information on correct disposal to be provided to customer • Watercart will be available in the event dust is generated during the application of cover • All staff to wear appropriate PPE
<p>Fire in the landfill resulting in air pollution and human exposure to toxins Fire in the vegetation storage area resulting in air pollution Fire in the tyre storage area resulting in air pollution and human exposure to toxic fumes Fire of landfill gas flare causing air pollution</p>	<ul style="list-style-type: none"> • Prevent customers from entering landfill face until fire is extinguished • Watercart will be used to extinguish smaller fire • Compactor and/or traxcavator will be used to separate and spread affected waste to allow the fire to be fully extinguished. • In the event of larger fires, activate PIRMP and implement Emergency Evacuation Plan. • Complete incident report via Vault
<p>Diesel spill during refuelling of plant and equipment resulting in contamination</p>	<ul style="list-style-type: none"> • Fence are off to prevent public from entering • Use absorbent material to clean up spilled oil • Dispose of clean up material in landfill • Complete incident report via Vault
<p>Illegal receival of chemicals for which the facility is not licenced resulting in human exposure to toxins</p>	<ul style="list-style-type: none"> • Staff to apply appropriate PPE before handling unknown chemicals • Place container into appropriate by-catch storage cabinet
<p>Illegal receival of medical or cytotoxic waste resulting in human exposure</p>	<ul style="list-style-type: none"> • Fence of area to prevent public from entering • Staff to apply appropriate PPE • Attempt to trace the material to its source • Complete incident report • Notify EPA / Ministry of Health if required • Cover material immediately with a minimum of 300 mm of VENM without compaction
<p>Natural Disaster including earthquakes, cyclones</p>	<ul style="list-style-type: none"> • Implement Emergency Evacuation Plan • Implement PIRMP

Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

Operations Manager Waste Services will contact all agencies if required and in accordance with this PIRMP

The key contact at Maitland City Council is:

Michelle Lindsay
Operations Manager Waste Services
Mobile:

Staff training

MCC will provide training to all its staff in accordance with the corporate training policy, specific training plans and as needed for specific requirements of work areas.

And evacuation drill will be conducted annually, but it will not be conducted during the operational hours of the facility. Staff have received warden training and staff have been trained in the use and application of this PIRMP Plan as well as the Emergency Evacuation Plan for the Maitland Resource Recovery Facility.

Testing and updating of the PIRMP

PIRMP update 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)
12 July 2015	Elfi Blackburn, Waste Services Coordinator	Fire in vegetation stockpile Evacuation of site (customers, contractors, staff) Notification of agencies as per PIRMP	Plan worked well, no changes required	July 2016
14 March 2016	Ben Quill Team Leader Waste Disposal	Fire in vegetation area and customer trapped in car	Plan worked well, no changes required	March 2017
5 April 2017	Paul Jakes Team Leader Waste Disposal	Suspicious items encountered with military marking, possibly an explosive device	Testing established: <ul style="list-style-type: none"> inadequate number of warden vest available temporary closure sign requires repair 	April 2018

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)
			<ul style="list-style-type: none"> Emergency checklist requires amendment Evacuation diagram to be updated 	
25 April 2018	Paul Jakes Team Leader Waste Disposal	Oil tank leaked decanting oil into surrounding ground and stormwater channel	Plan worked well, no changes required	April 2019
18 June 2019	Paul Jakes Team Leader Waste Disposal	Large bushfire approaching from the south	Plan worked well, no changes required. Some discussion points: <ol style="list-style-type: none"> All items of Plant should be left where they are, motors switched off Boom gates should be manually opened to allow access by Emergency Services if required In this scenario, potentially bring the water cart down to near the front gate 	June 2020
July 2013	Review and update information	Updated hazards and included operation of flare	Uploaded to website July 2013	
January 2015	Review and update of general information		Uploaded to website January 2015	
January 2016	Review and update of general information	Inclusion of hazardous substances register	Uploaded to website January 2016	
January 2017	Review and update of general information		Uploaded to website January 2017	
January 2018	Review and update of general information	Inclusion of Community Recycling Centre	Uploaded to website January 2018	
January 2019	Review and update of general information		Uploaded to website January 2019	

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)
May 2020	Review and update of general information	Information presented in accordance with EPA template for PIRMP	May 2020	
September 2020	Updated contact persons	Removed references to Paul Jakes	September 2020 Uploaded to website September 2020	
December 2021	Sarah Jackson Waste Officer & Phillip Thatcher Site Supervisor	Hydraulic oil spill from traxcavator	Plan worked well - November 2021 Uploaded to website November 2021	
December 2022	Sarah Jackson Waste Officer & Paul Seagrave Site Supervisor	Spillage of flammable liquid	Plan worked well - November 2022 Uploaded to website December 2022	
January 2023	Michelle Lindsay, Operations Manager Waste Services	Test following fire incident - 3 January 2023	Ministry of Health advised Council to directly contact the NSW Public Health Unit as required.	December 2023
October 2023	Review and update of general information	Update site names, contacts and relevant notification procedures		
December 2023	Sarah Jackson, Sustainability Officer & Leigh Weldon Site Coordinator	Storm causing sudden and significant leachate overflow	Plan worked well – December 2023	November 2024

EPA 2020P2148
November 2022