Pollution Incident Response Management Plan (PIRMP)

Artarmon - Environmental Protection Licence No. 957

REVISION	DATE	DESCRIPTION	AUTHOR	REVIEWED	APPROVED
1	13/02/19	New Document	J Trube	B Pala	B Pala
2	14/07/20	Revised to include contacts & document interface	J Farid	J Farid	B Pala
3	20/12/21	Update key contacts details	J Farid	J Farid	K Clark
4	21/09/22	Update key contacts details	J Farid	J Farid	K Clark

1 Introduction

1.1 Background

The Pollution Incident Response Management Plan (PIRMP) has been written to comply with the legislative requirements under the *Protection of the Environment Legislation Act 2011* and *Protection of the Environment Operations (General) Regulations 2009*.

An amendment to the Act in 2011 introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act now includes an additional requirement to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

The Plan has been prepared using the EPA NSW Environmental Guidelines for the 'Preparation of Pollution Incident Response Management Plans' published in March 2012, and in line with Weir Minerals Australia EHS Management System requirements.

1.2 Objective

The objectives of the PIRMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at Weir Minerals Australia (Artarmon), the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

1.3 Document Interface

This PIRMP is part of an integrated set of sub-plans to the EMP. Figure 1 shows the EMP framework for the site:

Figure 1: EMP Document Hierarchy

1.4 Scope

The Plan inherently has been written to assist with the management of pollution incidents. Not all environment incidents are classified as pollution incidents. While aspects of the plan may be applicable to all environment incidents, this plan need only be fully applied and implemented to environmental incidents that are deemed to be pollution incidents.

The Plan has applicability to the Artarmon Plant Site, hereafter referred to as 'the Site'. The Site is located in Artarmon, within the local government area of Willoughby Council. The Site is located on Lot 1 DP535037, Lot 567 DP785466, and Lot 1 DP1126478, and holds Environmental Protection Licence (EPL) No. 957.

1.5 Definition of Pollution Incident

A pollution incident is: an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

It includes an incident or set 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.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147, 148 and 151 of the *POEO Act 1997* as follows:

> (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 in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Material harm pollution incidents involving odour are required to be notified to the EPA in the same manner as other environmental incidents.

1.6 Distribution

A copy of this plan must always be available in written form at the Site (located at the Gatehouse). A written copy of the plan must be made available to an authorised EPA Officer on request or to any other person responsible for implementing the plan.

Some sections of this Plan must be made publicly available by placing them in a prominent position on the Weir Minerals Australia website. The information to be made available to the public must include:

- the procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
- the procedures for communicating with the community described in Annexure 1 of this Plan.

1.7 Testing the PIRMP

Testing of the PIRMP must occur at least once every 12 months. The testing should seek 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.

Testing may be undertaken by either desktop simulation or practical exercises - typically carried out by the Site's Emergency Response Team - and drills and should seek to cover all components of the PIRMP, including effectiveness of training.

The PIRMP must also be tested or reviewed within one month of any pollution incident occurring to determine whether the information in the Plan is current and capable of being implemented in a workable and effective manner.

Testing of the PIRMP will be included in the Site's Emergency Response Drill Schedule. An Emergency Drill Report will be completed following each drill and discussed during the scheduled SHE Committee Meeting following the drill.

2 Risk Evaluation

The site maintains an Environmental Management System (EMS) in compliance with *ISO14001:2015 - Environmental management systems*, in alignment with the Weir Group SHE Standards. Section 1.2 of the standard requires that the site assess and document its environmental hazards (called environmental 'aspects' under the standard), which is documented in WMA procedure *WMA-007 Identification & Assessment of Environmental Aspects & Impacts*.

The PIRMP will only include hazards that pose a level of threat to the environmental or human health in accordance with Part 5.7A of the POEO Act.

The following table provides an overview of the hazard types at the Site, the relevant controls, and the potential impacts on the environment or human health. The likelihood has been assessed using the WMA 'Risk Matrix'. Since all hazards on site have control mechanisms implemented, the likelihood component of the assessment has incorporated the effectiveness of those controls (i.e. residual risk).

3 Emergency Preparedness

3.1 Emergency Response Procedure

Artarmon's *Site Emergency Response Plan OHS-106(Ar)* contains the procedures to be followed in the case of various plausible emergency situations, including pollution incidents. Section 4.5 of the aforementioned Plan describes the procedures for responding to hazardous leaks, spills and environmental pollution events.

The procedure *Hazardous Leaks/Spills Procedure OHS-106(Ar) Attachment 6* details the steps to be taken in the event of a leak or spill involving hazardous substances on site.

3.2 Emergency Response Team

The Site has an established Emergency Response Team (ERT) who is trained in emergency response and performs regular emergency drill exercises. The ERT will be called upon in the event of a pollution incident.

3.3 Emergency Equipment

The site possesses and maintains various items of emergency response equipment, which may be used to respond to a pollution incident. These items include:

- spill kits, located throughout the site and indicated on Emergency Evacuation Plans (refer Page 14 of this Plan)
- personal protective equipment to assist in spill response located within spill kits
- gas monitoring meters located in ERT Room and Maintenance Workshop

- fire hydrant and hose reel network located throughout the site as detailed in the Emergency Evacuation Plans
- 1000L bulk storage container and sump pump for the collection and disposal of spills

Further detail on the items described above is presented in Section 8 of this Plan. Safety Data Sheets for substances used on site are located in hard copy format in dedicated folders located at the site Security gatehouse. Electronic versions are available via the WMA intranet (Chemwatch).

3.4 Pollutants

The majority of potential pollutants at the site are in the form of dangerous goods, consisting of both new products and waste products. Dangerous goods are handled and stored in accordance with *AS1940:2017 - The storage and handling of flammable and combustible liquids*. A list of pollutants is detailed in Section 9 of this Plan.

Annexure 1: Publicly Available Information

This Annexure has been prepared for the purposes of meeting requirements relating to the public accessibility of the Site's *Pollution Incident Response Management Plan* (PIRMP).

Tables 1 & 2 have been extracted from the document and published on WMA's website, as required by EPL No. 957, in order to exclude personal information as per the *Privacy and Personal Information Act 1998*.

4 Pollution Incident Response Management Plan: Artarmon

4.1 Environmental Protection Licence Details

Table 1: EPL No. 957 Details

Details	
Name of licensee	Weir Minerals Australia Pty Ltd
EPL Number	957
Premises name and address	Weir Minerals Australia 1 Marden St Artarmon NSW 2064
Company contact details	Name: **David Locke** Position: Director Phone (BH): (02) 9934 5300 Phone (AH): 0418 413 470 Email: david.locke@mail.weir
Website address	https://www.global.weir/australia/
Scheduled activities on EPL	Metallurgical activities Metallurgical activities Chemical production
Fee-based activities on EPL	Iron or steel production (scrap metal) Metal coating Toxic substances production

4.2 Pollution Incident – Contact Information of Weir Personnel

Table 2: Contact Information of Weir Personnel - Artarmon

Details		
PIRMP Activation	Name of person responsible: Position: Phone (BH): Phone (AH): Email:	**Randeep Mahajan** Director of Operations (02) 9934 5100 0477 987 872 randeep.mahajan@mail.weir
Notifying relevant authorities *Notification should be made by a person with an appropriate level of authority within the company*	Name of person responsible: Position: Phone (BH): Phone (AH): Email:	**Kurt Clark** SHE Manager (02) 9934 5100 0482 439 102 kurt.clarke@mail.weir
Managing response to pollution incident	Name of person responsible: Position: Phone (BH): Phone (AH): Email:	**Behrouz Abdollahi** Foundry Manager (02) 9934 1000 0408 191 848 behrouz.abdollahi@mail.weir

5 Notification of a Pollution Incident

Immediate threat to human health and/or property?	YES ➔ STEP 1, followed by STEP 2
	NO ➔ STEP 2 ONLY

IMPORTANT: All agencies in STEP 2 must be contacted, regardless of incident type. For example, Fire & Rescue NSW must be contacted even if there is no fire.

STEP 1		STEP 2	
Contacts	*Phone Number*	*Contacts*	*Phone Number*
Emergency Services *Fire & Rescue* *HAZMAT* *Police* *Ambulance*	000	EPA NSW *Licence No. 957*	131 555
		The Ministry of Health *via local Public Health Unit*	Royal North Shore Hospital (02) 9926 7111
		WorkCover	13 10 50
		Willoughby City Council *the local authority*	BH: (02) 9777 1000 AH: (02) 8579 0331
		Fire & Rescue NSW	1300 729 579
		Cleanaway *emergency spill response*	1800 774 557

6 Notification to Others

Implement this section where a need to notify has been determined and:

- potential effects of the pollution incident are considered to be localised to immediate site neighbours; or
- potential effects of the pollution incident are considered to be widespread and applicable to the general community.

The site is located on Marden St, Artarmon. The table below lists nearby land uses that lie in immediate proximity of Weir Minerals Australia's premises. In the event of a pollution incident occurring, consideration needs to be given to notifying the premises occupiers where it is deemed that the pollution incident may put those premises or the occupiers at risk. Any notification made should seek to provide, where possible, detail regarding any possible controls that may assist such as closing windows and doors.

NEIGHBOURS	
Contacts	*Phone*
Chatswood Toyota, 12 Marden St	(02) 9206 6966 or 1300 958 244
Holcim Australia, 5 Marden St	13 11 88
Bingo Recycling Centre, 10 Marden St	0407 086 166 or 1300 424 646 (no landline)
Corinthian Building, Maintenance Supervisor, 401 Pacific Highway	(02) 9906 4333 or 0412 262 387
Alto Audi Group, 405 Pacific Highway	(02) 9158 3575
EP&T Global, 407 Pacific Highway	(02) 8422 6000
Northview Apartment Building, cnr Pacific Highway and Gore Hill Freeway	(02) 9428 3484 or 0411 329 164
Lane Cove Tunnel (Linkt)	131 700 - RMS Traffic Management Centre

7 Description & Likelihood of Hazards

Hazard	Impacts	Likelihood	Conditions that could increase likelihood
Storage and handling of hazardous materials: • Spills • Fire • Gas release • Explosion	• Stormwater pollution • Respiratory effects • Property damage • Injury	M	• Ground subsidence • Earthquake • Physical damage to chemical storage infrastructure (e.g. collision by mobile plant) • Major failure of plant
Hot work (e.g. welding and oxy-cutting): • Fire • Explosion	• Respiratory effects • Property damage • Injury	M	• Flammable materials present in work area
Grinding and de-burring: • Fire • Explosion	• Respiratory effects • Property damage • Injury	H	• Flammable materials present in work area
Spray painting/coating: • Fire • Gas release	• Respiratory effects • Property damage • Injury	H	• Grinding or hot work conducted in/around spray painting activities
Discharge of trade waste to sewer: • Spills • Incorrect disposal	• Sewer pollution • Property damage (Sydney Water)	H	• Incorrect storage of chemicals near trade waste area
Operation of baghouses: • Spills (from dust collectors) • Dust emissions	• Respiratory effects • Property damage • Stormwater pollution	H	• Baghouse filtration failure • Baghouse fire
Moulding process: • Spills • Dust emissions	• Respiratory effects • Stormwater pollution	H	• Ground subsidence or earthquake • Physical damage to storage unit (e.g. by mobile plant) • Major failure of plant

Source: refer to the WMA Artarmon Risk & Opportunity Register for details

8 Pre-emptive Actions

Action	Details
Spill kits	• Located across site in numerous locations • Regularly inspected/stocked by supplier (monthly)
Spill response training	• Conducted for all new staff and labour hire • Refresher training held every 2 years
Emergency Response Team (ERT)	• Team established for site (consisting of site employees) • Emergency response equipment available
Access to vacuum loading trucks	• Contractor available at short notice to respond to spills
Stormwater protection	• Butterfly valves installed on 3 stormwater drains to prevent flow to stormwater easement • Drain covers accessible for 2 stormwater drains
Storage protection	• Chemicals stored in chemical cabinets designed for the class of chemical
Chemical information (SDS)	• Safety Data Sheets (SDS) available in each work area and regularly updated • Chemical manifest maintained using online system 'Chemwatch'

Pre-emptive measures are prescribed within the WMA Artarmon Environmental Management Plan, sub plans, and associated procedures.

9 Inventory of Pollutants

Location	Max Quantity Stored		Contents	Comments
Maintenance Workshop	12	m^3	Acetylene	Cylinders, stored in cage
Foundry	22,000	Litres	LPG	Stored in 2 tanks outside Fast Loop area
Maintenance Workshop	40	Kilograms	Propane	Stored in 8.5kg cylinders
Machine Shop (rear)	16,000	Litres	Oil and lubricants	Stored in 1,000L aboveground tanks (bunded, sheltered)
Foundry (before cast)	8,000	Kilograms	Catalyst	Stored in 205L drums
Foundry (before cast)	1,000	Litres	Ethanol	Stored in 205L drums
Foundry (melt and pour)	4,015	Kilograms	Ferromanganese	Stored in 205L drums
Foundry (melt and pour)	4,450	Kilograms	Aluminium, Ferrosilicon, and Manganese	Stored in 205L drums
Foundry (before cast)	20,000	Litres	Furan resin	Stored in 1,000L IBC containers in locked chemical cabinets
Foundry (before cast)	500	Litres	Triethylamine	Stored in 205L drums in secure containment area
Materials Laboratory	4	Litres	Peroxides	Various organic peroxides, stored in chemical cabinets
Materials Laboratory	100	Millilitres	Bromine	Stored in chemical cabinet
Foundry (before cast)	1,200	Litres	Class 8 PGII	Various corrosive substances, stored in chemical cabinets
Foundry (before cast)	9,500	Litres	Class 8 PGIII	Various corrosive substances, stored in chemical cabinets
Materials Laboratory	2	Kilograms	Yttrium	Stored in chemical cabinet
Foundry (before cast)	30,000	Kilograms	Chromite sand	Stored in silos outside Fast Loop area

10 Site Map - Spill Stations Locations