







Pollution Incident Response Management Plan

Version 15 – Sep 2024

IMPORTANT INFORMATION

Do not remove from the HAZMAT Box

Location - 129 Mitchell Ave Kurri Kurri NSW 2327 32.806918°S 151.474782°E

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SITE OVERVIEW

FACILITY OPERATIONS

1. Aluminium scrap processing

 Scrap receipt, storage, pre-processing, furnace remelt, casting and product storage and dispatch

2. Aluminium dross processing

Dross receipt, storage, processing and detoxification, and aluminium recovery

3. Scrap metal (ferrous and non-ferrous) processing

Scrap receipt, storage, shredding and product storage and dispatch

4. Hazardous Waste thermal destruction

 Receipt, storage and thermal processing of various wastes, including medical (clinical, anatomical, cytotoxic and pharmaceutical), solvents and paints, oily rags, pitch sludge residues and security document wastes

5. End Consumer Product Destruction

 Secure shredding of surplus, off-specification, recalled, damaged and unused Consumer products

6. Ash Management

In-house ash residue storage, beneficiation, bagging and dispatch

HAZARDS

Process Input	Hazards
Molten aluminium	Elevated temperature, explosion hazard upon contact with water, metal expulsion
Natural gas (DG 2; network-supply; non-stored)	Flammable gas hazard, fire
Solvents and paints (non-DG & DG 3)	Flammable liquid hazard, fire
Aluminium dross (DG 4.3)	Do not contact with water – potential flammable gas generation, fire / explosion
Medical Waste (non-DG, DG 6)	Toxic and infectious substances
High Voltage Electricity (11 kV)	Electrocution hazard
Diesel Fuel Oil (non-DG)	Combustible liquid, fire

PRE-EMPTIVE / POLLUTION INCIDENT MITIGATION ACTIONS

- Environmental Management System implementation (ISO 14001 accredited)
- Standard Operating Procedure implementation
- Staff competency training (in-house and external support)
- Incident response equipment provision and maintenance
- Site bunding and containment (nil discharge to the environment)
- PLC-controlled operation, monitoring and feedback systems
- Back-to-base monitoring (fire and security)
- Preventative maintenance
- Routine process and system monitoring, reporting and auditing

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HAZARDOUS CHEMICALS

SUMMARY

HAZARDOUS CHEMICALS

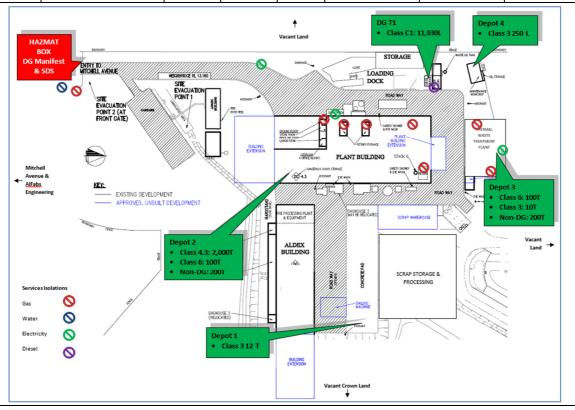
Description	DG Class	Packing Group	Maximum Capacity	Typical Quantity
Aluminium Dross	4.3	III	2.000 T	500 T
Medical Waste	6.1 & 6.2	III	200 T	70 T
Paint & Solvent Waste	3	III	22 T	10 T
Diesel	C1	-	11,930 L	10,000 L

BULK STORAGE

	Da	angerous	Goods		Storage			
ID No	Name	Class	UN No.	PG	Туре	Capacity	Typical Quantity	
DG T1	Diesel	C1	3082	-	AGT	11,930 L	10,000 L	
Depot 2	Dross	4.3	3170	III	Warehouse	2,000 T	500 T	

PACKAGED STORAGE

	Dange	rous Go	ods		Storage			
ID No	Name	Class	UN No.	PG	Туре	Capacity	Typical Quantity	
Depot 1	Paint & Solvent Waste	3	1993	III	Bunded containers	12 T	5 T	
Depot 2	Medical Waste	6	2814	III	Warehouse	100 T	10 T	
Depot 3	Medical Waste	6	2814	III	Warehouse	100 T	60 T	
Depot 3	Paint & Solvent Waste	3	1993	III	Warehouse	10 T	5 T	



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LOCATION & LAYOUT

SITE IDENTIFICATION: Weston Aluminium Pty Limited

SITE ADDRESS: 129 Mitchell Avenue KURRI KURRI NSW 2327

NEAREST CROSS STREET: Johnson Avenue KURRI KURRI NSW

ACCESS FROM: Mitchell Avenue KURRI KURRI NSW 2327

MAIN GATE ACCESS CODE: Held by the NSW RFS

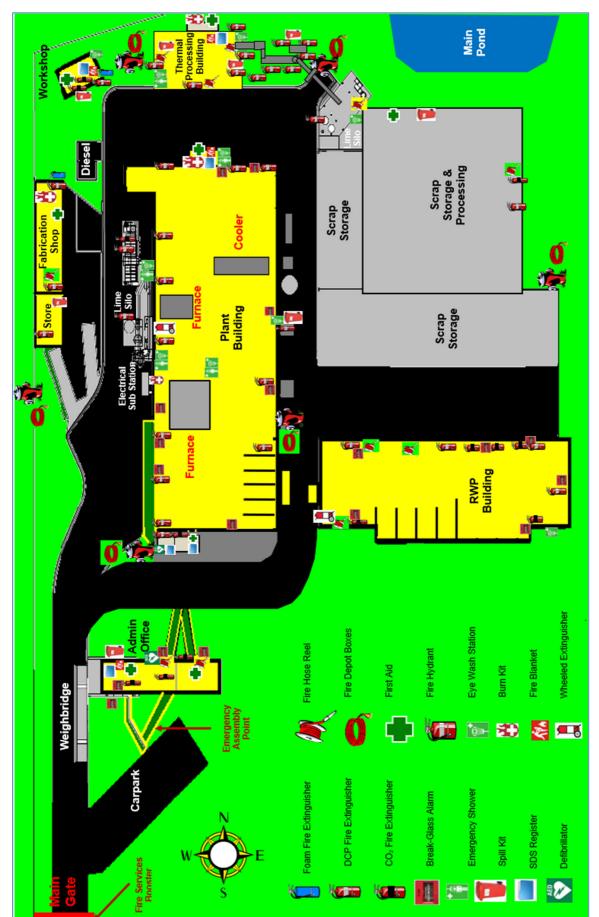




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LOCATION & LAYOUT

EMERGENCY EQUIPMENT LOCATIONS



EMERGENCY EQUIPMENT LOCATIONS

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PROCEDURE - ALL INCIDENTS

1. Ensure the safety of people in the immediate area

- Ensure that people within the vicinity of the incident are aware, and are able to evacuate
- Should Evacuation be required, follow the 'EMERGENCY EVACUATION' procedure
- Should medical response be required, follow the 'MEDICAL EMERGENCY' procedure

2. Incident control and containment

 If possible, cease operations and isolate the appropriate plant and equipment to prevent further pollutant release and potential impact to others and the environment

PROCEDURE –
ALL INCIDENTS

- Contain the immediate area to prevent the escape of pollutants beyond the immediate vicinity and site boundary
- Refer to Appendix A for site Hazards and associated mitigation measures
- Refer to Appendix B for Dangerous Goods Substances List and associated SDSs
- Refer to **Appendix C** for Emergency Equipment Plan
- Note: all Appendices are available on the Server at: *Team Leaders/PIRMP/Appendices/*

3. Notify all required parties

- The Team Leader / Senior Management Representative must immediately notify the General Manager
- The General Manager is to follow the 'CONTACTS & NOTIFICATION' procedure to notify all Relevant Authorities. Neighbouring properties potentially impacted by the pollution incident must also be notified
- Follow-up contact is to be made to all parties if and when conditions change
- 4. Implement other relevant procedures herein, as applicable to the incident
- 5. Stay calm and await further instruction from Emergency Services and/or other Relevant Authorities, as applicable

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EMERGENCY EVACUATION

1. Ensure the safety of people in the immediate area

- Ensure that people within the vicinity of the emergency are aware of the incident nature and location, and are able to evacuate
- Notify site personnel via 2-way radio (UHF69)

2. Call for Help by dialling 000

- Dial 000 on any internal telephone or 000 from any mobile phone
- 3. In case of fire, close (DO NOT LOCK) all doors and windows as you leave (only if safe to do so)
 - You may fight the fire using the equipment available, ONLY if you are trained in its use and it is safe to do so

4. Stay calm and walk to the Emergency Assembly Point – CARPARK (unless instructed otherwise by the Chief Warden)

- If instructed and safe to do so, shutdown any hazardous equipment and turn off any electrical appliances, but leave the lights turned on
- Do not stop to collect personal belongings unless instructed to do so leave immediately
- On your way out, ensure that everyone else is aware of the evacuation order

5. At the Emergency Assembly point (CARPARK):

- Give your name to the Chief Warden, if present
- If the Chief Warden is absent, the Area Warden (Team Leader on shift) is to collect the names and work area details of everyone at the Assembly Point
- Check that everyone is accounted for against the electronic attendance database and Contractor/Visitor logs
- Notify the Chief Warden (if present) or notify the Area Warden if someone is missing
- Remain at the Assembly Point and await further instructions
- 6. Do not attempt to re-enter the site or an evacuated building until entry is authorised by the Chief Warden, their deputy, or by Emergency Services personnel
- 7. Document incident particulars on an Incident Report

EMERGENCY EVACUATION

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MEDICAL EMERGENCY

Rapidly but calmly assess the situation

- Advise the First Aid Officer on duty. A list of trained First Aiders is posted throughout the site
- If the casualty requires treatment that is beyond the training of the First Aid Officer, then:

Call for assistance - dial 000 for Ambulance

 If mobile phone access is not immediately available, send someone to the nearest landline to make the call. Ensure that they return to confirm that the call has been made

Provide essential information:

- Your name
- Your Location:
 - Weston Aluminium: 129 Mitchell Avenue, Kurri Kurri
 - Nearest Cross Street Johnson Avenue, Kurri Kurri
 - Enter from Mitchell Avenue, Kurri Kurri
- Your Phone number
- Description of the emergency
- Review response actions defined in SDS. Registers are available throughout the site
- Undertake the DRABC Action Plan on the Basic Life Support Flow Chart (Appendix D)
- Provide assistance in access for the incoming ambulance
 - Provide a person or marker at the Front Gate to direct the ambulance safely to the casualty

When the ambulance crew arrives on scene

- Provide casualty hand-over information:
 - Mechanism of injury
 - Injuries
 - Signs and symptoms
 - Treatment performed
- Assist the ambulance crew as required
- Document incident particulars on an Incident Report

MEDICAL EMERGENCY

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PROPERTY FIRE

"R.A.C.E."

- 1. 'RESCUE' Any personnel in immediate danger
- 2. 'ALERT' Fire & Rescue NSW / NSW Rural Fire Service Dial 000
 - If mobile phone access is not immediately available, send someone to the nearest landline to make the call, ensure they return to confirm the call has been made

Provide essential information

- Your name
- Your Location:
 - Weston Aluminium: 129 Mitchell Avenue, Kurri Kurri
 - Nearest Cross Street Johnson Avenue, Kurri Kurri
 - Enter from Mitchell Avenue, Kurri Kurri
- Your Phone number
- Description of emergency
- Highlight to Emergency Services the hazards associated with the use of water within DG 4.3 stores and in the vicinity of molten aluminium. Alternative fire response measures MUST be applied in these areas
- Clearly identify the nature and location of all wastes, consumables and other materials preset on site at the time of the incident – refer Emergency Services Information Package located in the Manifest Box (main entrance)
- Contain all potentially-contaminated fire water by isolating the Main Pond pumps. No discharge of fire waters to the environment or Trade Waste is to occur
- Ensure that Fire & Rescue NSW / NSW Rural Fire Service deploy appropriate fire water containment controls
- 3. 'CONTAIN' Close (DO NOT LOCK) all doors and windows to contain the fire
- 4. 'EXTINGUISH' Attempt to extinguish the fire with available equipment if
 - It is safe to do so
 - You are trained to do so
 - Refer to the Emergency Equipment Locations plan (Appendix C) for location of fire response equipment
- 5. Follow the Emergency Evacuation Procedure. Do not return to the area until advised by the NSW Fire Brigade / NSW Rural Fire Service
- 6. Document incident particulars on an Incident Report

FIRE

PROPERTY

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HAZARDOUS SUBSTANCE SPILL

1. Raise the alarm

- Direct people to leave the immediate area
- Summon the Emergency Service(s) if deemed necessary

2. Secure the area

 Do not allow any persons to enter the vicinity of the emergency unless they have specialist knowledge or skills

3. Approach with care

- Approach from an upwind position to keep from coming in contact with vapours
- Only approach if necessary to determine the type or extent of the spill or to begin containment or recovery procedures if safe to do so

Keep in mind that many vapours and gases may be odourless, colourless, and heavier than air, and may accumulate in low-lying areas, particularly when there is no wind

4. Identify the chemical involved and assess the situation

Determine the substance(s) involved and the likely hazards posed. Information may be obtained from:

- Safety Data Sheets
- Vehicle and container placards
- Drivers manifest

5. Determine if anyone has been injured, and follow the 'Medical Emergency' procedure, if required

6. Respond in an appropriate manner

Response might include, but is not restricted to:

- Summoning the appropriate emergency service(s), e.g. HAZMAT (dial 000)
- Donning appropriate PPE
- Shutting down operations and equipment
- Following 'Emergency Evacuation' and/or 'Medical Emergency' Procedures
- Rescuing or removing casualties
- Ordering a partial or whole site evacuation
- Implementing containment procedures. Refer Appendix B for SDS instructions for spill response, and Appendix C (Emergency Equipment Plan) for locations of spill response equipment (booms, blankets, absorbent litter)
- Isolate the Main Pond pumps to ensure site containment
- Inform the Environmental Protection Authority (EPA) (dial 131 555)

7. Document incident particulars on an Incident Report

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HAZARDOUS SUBSTANCE

SPILL

EMISSION TO AIR

1. Raise the alarm

- Direct people to leave the immediate area
- Summon the Emergency Service(s) if deemed necessary

2. Secure the area

 Do not allow any persons to enter the vicinity of the emergency unless they have specialist knowledge or skills

3. Approach with care

- Approach from an upwind position to keep from coming in contact with vapours
- Only approach if necessary to determine the type or extent of any spill or to begin containment or recovery procedures if safe to do so

Keep in mind that many vapours and gases may be odourless, colourless, and heavier than air, and may accumulate in low-lying areas, particularly when there is no wind

4. Operate the deluge system

 If a fire is suspected within Baghouse 1 or Baghouse 5, and if deemed safe to do so, operate the applicable deluge system

5. Identify the chemical involved and assess the situation

Determine the substance(s) involved and the likely hazards posed. Information may be obtained from:

- Safety Data Sheets (Appendix B)
- Vehicle and container placards
- Driver's manifest

6. Determine if anyone has been injured, and follow the Medical Emergency procedure, if required

7. Respond in an appropriate manner

Response might include, but is not restricted to:

- Summoning the appropriate emergency service(s) (dial 000)
- Summoning HAZMAT (dial 000)
- Donning appropriate PPE
- Rescuing or removing casualties
- Following 'Emergency Evacuation' and/or 'Medical Emergency' Procedures
- Ordering a partial or whole site evacuation
- Beginning containment procedures
- Informing the Environmental Protection Authority (EPA) (dial 131 555)
- Informing other relevant authorities & stakeholders (see Contacts & Notification overleaf)

EMISSION TO AIR

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WET WEATHER & FLOOD RESPONSE

Given the proximity to the adjacent Swamp Creek and adjacent lowlying lands, (particularly to the north), heavy and sustained rainfall may result in site flooding. Stormwater containment and management capacities may also be impacted during severe wet weather events.

- 1. Maintain diligent awareness of weather forecasts and potential for site flooding.
- 2. In advance of potential flooding, ensure that onsite containment systems are kept at low levels and that pumping systems are in proper working order.
- 3. Implement the following measures in advance of potential flooding:

Aluminium Processing

- Cast-out all furnaces (eliminate all sources of molten aluminium)
- Ensure all plant and equipment which has the potential to become buoyant are secured to prevent movement
- Check and ensure the integrity of Main Pond bund walls, level controls and pumping systems
- Install supplementary stormwater containment and/or pumping capacity for increased rate of Trade Waste discharge (NO ENVIRONMENTAL DISCHARGE IS TO OCCUR). The General Manager is to consult with Hunter Water regarding a proposed increase to sewer discharge rate. Alternatively, arrange for pump-out and road haulage for offsite disposal

Thermal Processing

- Install dry flood-proofing (boards) to the Thermal Processing Facility building
- Ensure all plant and equipment which has the potential to become buoyant are secured to prevent movement
- Ensure all waste storage bins are secured safely to reduce the risk of movement and overtopping
- Ensure all kiln ashes are recovered from the process and bins relocated to higher ground

Yard / Logistics

- Ensure all plant and equipment which has the potential to become buoyant are secured to prevent movement
- Ensure diesel tank self-bunding systems are functional and in working order

WET WEATHER & FLOOD RESPONSE

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CONTACTS & INFORMATION

- 1. Each and all of the 'RELEVANT AUTHORITY' contacts MUST be notified immediately by the General Manager (or delegate) in the order given if a pollution incident is causing or threatening material harm to the environment, defined as:
 - Harm to the environment is material if:
 - It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, and
 - 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.

Relevant Authority	Phone Number
NSW Environment Protection Authority	131 555
NSW Health (Hunter New England Health District)	4924 6477
Fire & Rescue NSW / NSW Rural Fire Service	000
SafeWork NSW	131 050
NSW Department of Planning, Housing & Infrastructure (Compliance)	6575 3400
Cessnock City Council	4993 4100

2. Provide essential information:

- Your name
- Your location:
 - Weston Aluminium: 129 Mitchell Avenue, Kurri Kurri
 - Nearest Cross Street Johnson Avenue, Kurri Kurri
 - Enter from Mitchell Avenue, Kurri Kurri
 - Your phone number
 - Description of incident

3. Neighbouring premises listed below must also be notified where potentially impacted by the incident

Contact	Phone Number
Adjoining Community Members:	
AlFabs Mining Equipment P/L	4936 5000
Allight Sykes	4937 0101
Wine Selectors	4936 2319
Hydro Aluminium P/L	4937 1555
Key Weston Group Contacts:	
Christopher McClung – General Manager	0409 462 532
Graham Snedden – Operations Manager (WA) Chief Warden	0414 909 389
Belinda Paton – Operations Manager (WTS)	0437 026 280
Dean Latter – Maintenance Manager	0448 745 271

CONTACTS & INFORMATION

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POLLUTION INCIDENT RESPONSE FLOWCHART

Environmental Pollution Incident Occurs

Employee or Contractor who observes / identifies the incident must notify their Supervisor

IMMEDIATELY

The relevant Supervisor must then notify the General Manager (0409 462 532)

IMMEDIATELY

The General Manager is to direct implementation of the Pollution Incident Response Management Plan to respond to the Incident

The General Manager is to determine whether the pollution incident constitutes 'actual or potential harm to the environment'

Continue to implement Pollution Incident Response Management Plan and internal reporting procedures

Potential Pollution Incidents Include:

- · Diesel or chemical spill to land
- Diesel or chemical spill to water (dam, stormwater drainage network)
- · Unauthorised offsite water discharge
- · Spillage of effluent to land or water
- Failure / breakage of pipelines carrying effluent, hydrocarbons, dirty water or chemicals
- Main Pond wall failure
- · Excessive dust emissions
- Fire, causing excessive smoke and fumes
- Excessive and offensive odour generation

Dependent upon the nature of the Incident. Refer to the relevant slide in this PIRMP for response procedures (e.g. fire, spill, emission, flood etc.)

The General Manager is to notify all Relevant Authorities and neighbouring entities in accordance with 'Contacts & Notification' procedure. Further contact is to be made if conditions change

The General Manager is to facilitate a test, review and update the PIRMP on an annual basis. A review and update is also required within 1 month of PIRMP implementation in response to a pollution incident

PROCESS FLOWCHART

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PIRMP TEST, REVIEW & UPDATE

TESTING

The Pollution Incident Response Management Plan is to be tested:

- On a biennial basis (at least once every 2 years);
- Within 1 month of a pollution incident which caused or threatened material harm to the environment; and
- Testing of the PIRMP to proceed via:
 - A desktop review exercise;
 - Awareness and incident response training and scenario discussion feedback;
 - o Drill exercise (with/out Emergency Services involvement); or
 - Mock practical exercises (e.g. spill response scenario)

REVIEW & UPDATE

The Pollution Incident Response Management Plan is to be reviewed and updated:

- On an annual basis;
- In response to site amendment:
 - site layout change / augmentation;
 - o introduction of new facilities;
 - o introduction of new or deletion of process inputs; and
 - o introduction of new plant, equipment and process operations
- In response to an environmental pollution incident;
- In response to a consultative desktop review or drill exercise;
- In response to regulatory authority (e.g. NSW EPA, NSW DPE) or FRNSW and/or NSWRFS input / requirement / request; and
- In response to a PIRMP Guideline update

RESPONSIBILITY

Maintenance, Testing, Review and Update of the Pollution Incident Response Management Plan is the responsibility of:

Christopher McClung: General Manager

DOCUMENT CONTROL

In accordance with the Weston Group Integrated Management System:

- The Pollution Incident Response Management Plan Version Number and Date of updates are to be reflected in the Cover Page and Footer; and
- Old versions are to be removed from the HAZMAT box and Server directory

PIRMP REVIEW

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