



Pollution Incident Response Management Plan (PIRMP)

Aluminium Specialties Group Pty Ltd. (Alspec)

3 Alspec Place


Eastern Creek NSW 2766

33.808390 S, 150.849618 E

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 12454

Approved by: Ravneil Narayan
Position: Acting Sydney Branch Manager

Signature: 
Date: 05/05/2023

PURPOSE:

Aluminium Specialties Group Pty. Ltd (Alspec) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 3 Alspec place, Eastern Creek. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan is to be kept on site and likewise available to the public via Alspec's website <https://www.alspec.com.au/assets/Pollution-Incident-Response-Management-Plan-EasternCreek.pdf>

Environment Protection Licence (EPL) Details

Name of licensee: (including ABN)	Aluminium Specialties Group Pty. Ltd (Alspec). ABN: 63001252259
EPL number:	12454
Premises name and address:	Alspec, 3 Alspec place, Eastern Creek NSW 2766
Coordinates:	33.808390 S, 150.849618 E
Company or business contact details	Name: Ravneil Narayan Position or title: Acting Branch Manager Business hours contact number/s: 0298349500 / 0402 181 115 After hours contact number/s: 0402 181 115 Email: marayan@alspec.com.au
Website address:	www.alspec.cpm.au
Scheduled activity/activities on EPL:	Metallurgical Activities
Fee-based activity/activities on EPL:	Metal waste generation / >5.00 – 100.00 / T annual volume of waste generated or stored

Pollution incident – person/s responsible

PIRMP activation	Name of persons responsible: Ravneil Narayan / Graham Lee Positions: Branch Manager / Operations Manager Business hours contact number/s: 02 98349535 After hours contact number/s: 0402 181 115 / 0491 149 431 Email: rnarayan@alspec.com.au / glee@alspec.com.au
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Pollution incident – person/s responsible, continued

Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

Name of person responsible: Ravneil Narayan

Position: Acting Branch Manager

Business hours contact number/s: 0402 181 115

After hours contact number/s: 0402 181 115

Email: rnarayan@alspec.com.au

Managing response to pollution incident

Name of person responsible: Graham Lee

Position: Operations Manager

Business hours contact number/s: 0491 149 431

After hours contact number/s: 0491 149 431

Email: glee@alspec.com.au

Notification of relevant authorities

Notification of the relevant authorities will be dependent on the nature and severity of the incidents/events. Listed below are the relevant authorities for possible notification.

1. **In the unlikely event of an emergency, Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (First Notification)**
2. EPA – 131 555
3. SafeWork NSW – 131 050
4. NSW Health – Blacktown Hospital – 02 9391 9000
5. Blacktown Council – 02 9839 6000

Notification of relevant authorities, continued

Fire & Rescue NSW / Rural Fire Service – Fire Brigade Rooty Hill (For non-emergencies)	Contact number/s:	02 9832 4433
EPA NSW	Contact number/s:	131 555
NSW Health Ministry of Health	Relevant Area Health	02 9391 9000
Blacktown Hospital	Service:	02 9881 8000
Mouth Drutt Hospital	Contact number/s:	02 9881 1555
For Infectious Diseases	Contact number/s:	02 4734 2022
Penrith Public Health Unit		

(Nepean Blue Mountains LHD)
PO Box 63, Penrith 2751

**After hours
(Westmead Hospital)**

**Ask for Public Health
Officer on Call** 02 4734 2000

SafeWork NSW

Contact number/s: 131 050

Local Authority. Blacktown Council

Contact number/s: 02 9839 6000

Any other identified organisation or agency requiring notification (if applicable)

Contact number/s:

Service NSW

13 77 88

Sydney Water

13 20 90

Water NSW

1300 662 077

Department of Planning Industry and Environment

1300 305 695

Relevant Third-Party Contacts

Notification of neighbours and the local community

Branch Manager or his appointed authorised person to notify neighbours via a phone call.

Vitex Pharmaceuticals – 4 Alspeck place, Eastern Creek, NSW 2766 ph. 02 9098 3333

Ontex manufacturing Australia – 1 Alspeck place, Eastern Creek, NSW 2766 ph. 02 9832 5300

Description and likelihood of hazards

Description of the possible hazards to human health or the environment associated with the business' activities:

Metal Etch 295NF

- Acute toxicity (Oral): Category 2
- Acute toxicity (Inhalation): Category 3
- Acute toxicity (Dermal): Category 1
- Skin corrosion/irritation: Category 1A
- Serious eye damage/eye irritation: Category 1

Oxsilan AL0510

- Acute toxicity: Cat. 5 (Oral)
- Skin corrosion/irritation: Cat. 2
- Serious eye damage/eye irritation: Cat. 2A

Oxsilan 9950

- Skin corrosion/irritation: Cat. 1A
- Serious eye damage/eye irritation: Cat. 1

Likelihood of any such hazards occurring:

- Unlikely impact on containers from forklift causing the release of chemicals (Note: Area where IBCs are stored are bunded or are on a spill containment pallet)
- Unlikely structural failure of the pre-treatment tanks causing the release of the chemicals (Note: Area is bunded)

Pre-emptive actions to be taken

To prevent the occurrence of any incident i.e. spills or damage to plant, equipment or environment, Alspec undertakes the following:

- Reviews and evaluates its use of chemicals and where possible, utilises more environment-friendly/safer chemicals e.g. changed from chrome-based to chrome-free pre-treatment chemicals
- Ensures the regular maintenance of equipment through qualified third-party providers
- Training of relevant staff on the use of the crane and forklift
- Staff conduct pre-operational checks prior to the use of crane and forklift
- Staff performs regular housekeeping to eliminate/minimise waste in and around the bunded areas and drains
- Staff are trained on the use of the spill kits which are inspected regularly and located near the sources of the hazards
- Relevant Safety Data Sheets (SDS) are accessible to staff in the immediate area and also through the online system Donesafe
- Ensures that suppliers of chemicals used are accredited and inducted on site

Inventory of pollutants

Listed below are the chemicals used and stored on site

Location

Max. Quantity

Contents

Comments

Pre-treatment area and tank room	6,000 litres	METALL ETCH 295nfc Acidic Aluminium Etch Cleaner (In solution with DI water)
Pre-treatment area and tank room	6,000 litres	OXSILAN AL 0510 Silane based liquid pre-treatment (In solution with DI water)
Pre-treatment area and tank room	Included in above	OXSILAN 9905 Additive (In solution with DI water)
Pre-treatment area and tank room	200 litres	OXSILAN 9950 & OXSILAN 9960 additives
Various areas around the powder coat line	15,000 kilos	Powder Coat Paint
Back hard stand area	15,000 kgs (2 x 7500 kgs)	LPG tank (above ground)
Back hard stand area	18 bottles of 15kgs	LPG gas bottles

Safety equipment

Spill kits

- 1 wheeled bin universal and chemical use Tank area (Chemical treatment area)
- 2 wheeled-bin universal and chemical use Pre-treatment area (Inside)
- 1 wheeled-bin universal and chemical use Front apron (Despatch)
- 1 wheeled-bin universal and chemical use Back apron (Receiving)

Stormwater Drains - Location

- 2 stormwater drains at the rear apron (eastern side) with sediment traps

Communicating with neighbours and the local community

In the unlikely event of the identification of the possible negative/harmful impact of the premises' activities, Alspec will immediately notify the relevant neighbouring premises and/or local community as soon as reasonably practicable.

Any query specific to the premises' activities can be addressed to the Branch Manager or through info@alspec.com.au

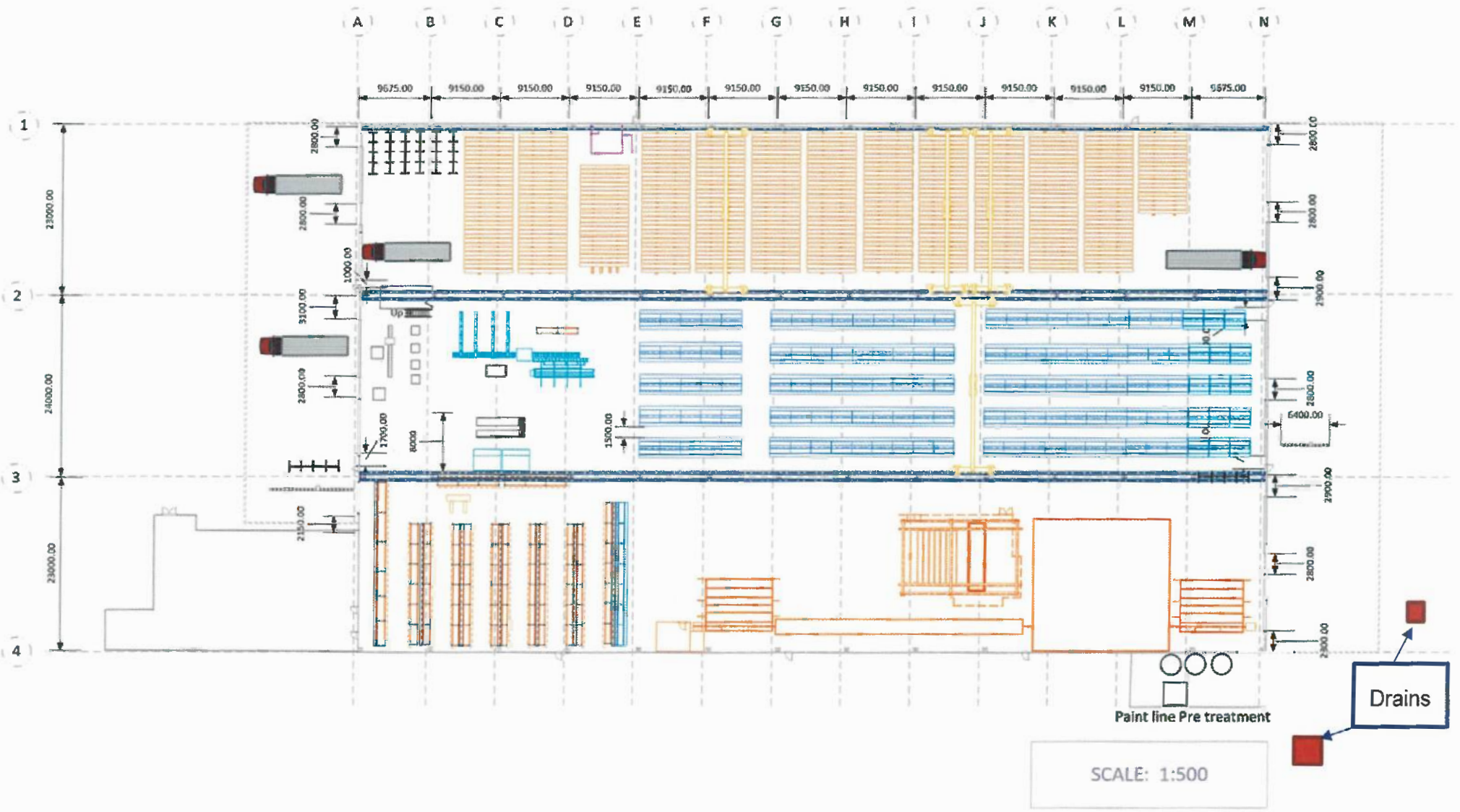
Minimising harm to persons on the premises

Staff on site are inducted on the various activities/operations on site including those that relate to the paintline and associated chemicals used.

Only inducted and authorised staff are allowed in the paintline area.

Mandatory personal protective equipment (PPE) are provided to staff.





Actions to be taken during or immediately after a pollution incident

Alspec has developed HSE09.PR.001 HSE Incident Management and Emergency Management Procedures to ensure that appropriate responses are undertaken for specific incidents.

Also in place is HSE08.PR.002 Chemical Management Procedure to further mitigate any risks associated in the use, transport and storage of chemicals. Relevant Safety Data Sheets (SDS) are retained on site and a chemical register is also available on the online system Donesafe.

Spill Response Procedure

CHECK

Assess the seriousness and identify existing and potential hazards

CALL

Sound the alarm and report the incident to the Manager providing all relevant information (location, nature of the spill and if external services required)

Branch Management to determine the level of escalation as per HSE09.PR.004 Statutory Notification of HSE Incidents

CONTROL

Undertake necessary steps AND if safe to do so, control the source of the spill e.g. shutting off equipment

CONTAIN

Use available spill kits to contain the effects. Ensure that stormwater drains are protected



Spill kits are located at key locations on site

CLEAN-UP

Collect and dispose used spill kit materials as per requirements

Branch Management to record details of the incident as per Incident Management Procedures.
National HSE Manager to undertake reporting of incident, where required, to relevant external agencies

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

See above in Spill response procedure

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

See above in Spill response procedure

Coordinating with persons

Any coordination and notification in relation to any incident and/or this plan will be coordinated through the Branch Manager in consultation with the following:

- Managing Director
- National Warehousing & Projects Manager
- National Manufacturing and Transport Manager
- National HSE Manager

Identification of specific information to be communicated dependent on the type/nature of the event or concern.

Staff training

Training for all relevant staff on the specifics of this plan and associated procedures are to be undertaken annually or as deemed necessary i.e. post an actual event or due to changes in equipment or processes which increase the potential risk levels. Training may include but are not limited to the following:

- Toolbox talk on the specifics of this plan
- Use of the spill kits
- Warden training

This plan is to be tested annually through a “mock” incident response drill or a desk-top exercise. Records of the drills or exercises are to be maintained and lessons learned communicated.

Testing and updating of the PIRMP

Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
5/5/23	Graham Lee Peter Lino John Abraham Ryan Higgins Aman Pillay Craig Korzeniowski	Team walked through simulated acid spill in Chemical treatment area. Followed procedure	Chemical spill kit missing from Chemical treatment area. Drains not noted in map. Training not regularly completed. Log Annual Spill Training into Branch Calendar Additional Bunding – Rear Treatment Area Confirm Housekeeping Areas Of Responsibilities – Meet with Ryonex Discuss alone Ryonex Staff Member onsite Possible Chemical Exposure First Aid Kit in treatment area Update diagram to demonstrate drains on site map Locate copy of SDS if treatment area in a water proof cupboard Add donesafe to phone to make sure tech logs in when on site Repair roller shutter door to operate by motor and by chain	21/6/24
28/06/2022	Samantha Marshall Daniel Fletcher Ryan Higgins Aman Pillay Craig Korzeniowski	Desktop simulation – Burn off oven Catches fire Actions taken by the team – Turn off main gas switch Evacuate the area Contact Fire brigade Set up bunded area to catch water/sludge Once area deemed safe and controlled by the fire brigade and site manager, notify furnace company to assess damage and begin investigation on what went wrong Burn off oven will be tagged out during this process	Possible areas for improvement are Implement regular training on incident response Ensure debris/product not stacked up around the oven Ensure there is a fire warden identified at the back of the warehouse Extend training to the whole team located at the area	21/06/2023

PIRMP Update details

Date of Update	Reason for update	Details of updates	Date the updated version uploaded to website	Date of completion
5/5/23	Staff changes and detail update	New Acting Branch Manager, New Operations Manager. Drain detail added to map	12/5/23	12/5/23
15/05/2020	Updated PIRMP to the new EPA format	Contact details, map and pollutant inventory updated	15/05/2020	22/05/2020
21/06/20	Annual training	Desktop training performed	21/06/2020	