POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

BISALLOY STEELS PTY. LTD.
18 RESOLUTION DRIVE
UNANDERRA NSW 2526

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 21398

Approved by: Shane Wilson

Position/Title: Manufacturing Manager **Date: 16/05/2022**

PURPOSE:

Bisalloy Steels holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Bisalloy Unanderra premises. 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 must be kept at Bisalloy Steels – 18 Resolution Drive Unanderra, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Environment Protection Licence (EPL) Details

Name of licensee:	Bisalloy Steels Pty Ltd
ABN:	22 098 674 545
EPL number:	21398
Premise's name and address:	Bisalloy Steels – 18 Resolution Drive Unanderra NSW
Company or business contact details	**Name: Jose Cabello** **Position or title: Engineering & Maintenance Manager** **Business hours contact number/s: (02) 4272 0427** **After hours contact number/s: 0437 648 688** **Email:** jose.cabello@bisalloy.com.au
Website address:	www.bisalloy.com.au
Scheduled activity/activities on EPL:	Metallurgical Activities
Fee-based activity/activities on EPL:	Metal processing; 0-100,000 tonnes per annum

Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

PIRMP activation	**Name of person responsible:**	**Dean Thomson/ Mede Cuttill/ Joel Rogan**
	Position or title:	**Team Leader (shift)**
	Business hours contact number/s:	**(02) 4272 0423**
	After hours contact number/s:	**(02) 4272 0423**
	Email:	jose.cabello@bisalloy.com.au

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:**	**Shane Wilson**
	Position or title:	**Manufacturing Manager**
	Business hours contact number/s:	**(02) 427240478**
	After hours contact number/s:	**0437972719**
	Email:	shane.wilson@bisalloy.com.au
Managing response to pollution incident	**Name of person responsible:**	**Jose Cabello**
	Position or title:	**Engineering and Maintenance Manager**
	Business hours contact number/s:	**(02) 4272 0427**
	After hours contact number/s:	**0437 648 688**
	Email:	jose.cabello@bisalloy.com.au

Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Relevant authorities include:

Fire & Rescue NSW / Rural Fire Service (first notification)	Contact number/s:	000
EPA	Contact number/s:	13 15 55
NSW Health – Illawarra Shoalhaven Local Health District - Wollongong Hospital	Contact number/s:	4222 5000
SafeWork NSW	Contact number/s:	13 10 50
Wollongong City Council	Contact number/s:	4227 7111

Notification of relevant authorities, continued

Endeavor Energy	**Contact number/s:**	**13 10 03**
Sydney Water	**Contact number/s:**	**13 20 90**
Jemena (Gas Supply)	**Contact number/s:**	**13 19 09**
Police – Wollongong Police station	**Contact number/s:**	**4226 7899**
State Emergency Services (SES)	**Contact number/s:**	**13 25 00**
Roads and Maritime Services	**Contact number/s:**	**13 17 82**

Notification of neighbours and the local community

Occupiers of adjacent properties are to be advised of Environmental Incidents as soon as practical by phone call. This is to be done by the Incident Manager after notification of the incident. Regular updates to neighbours are also to be provided by the Incident Manager by phone.

Go Hire	**Contact number/s:**	**4272 7777**
Liebherr Cranes	**Contact number/s:**	**4272 2044** **0434 318 377**
Wollongong Civil Contractors	**Contact number/s:**	**4272 3336**
Bluescope Steel - Welded Products	**Contact number/s:**	**4272 2544**
DGL - Hydromet	**Contact number/s:**	4274 2100 (office) Ops Manager – (Heath Pylyp)

Description and likelihood of hazards

Machine / Area	Hazard Type	"What" Can Happen?	"How" Can it Happen?	Current Controls	Consequence	Likelihood	Current Risk Score	Rating	Proposed Controls	Consequence	Likelihood	Current Risk	Rating
Workshop	Environmental release	chemical/solvent/lubricant spill or loss on containment	Unknown effects of chemicals/solvents/lubricants, contamination of air, soil, wastewater	1. Pre-operational checks on chemicals/sovents/lubricants before use 2. PPE clothing, eye & respiratory protection 3. MSDS on file and indicate appropriate PPE & emergency response 4. Spill kits 5. Access control	1	3	3	L	1. Operator Training 2. Operator competency assessment 3. Auditing of chemical handling & use. 4. Update Emergency response training	1	2	2	L
Crane	Environmental release	Damage to truck fuel/hydaulic systems by dropped or dislodged plate loads during loading or unloading	1. Magnet/Crane failure 2. Truck moves during loading/Unloading 3. Uncontrolled swinging of suspended load	1. Dedicated loading/Unloading bays 2. Environmental response equipment provided 3. Environmental response training. 4. Crane driver training 5. Driver safe zones during loading - not allowed in truck cabin	2	3	6	M	1. Dual hoist beams and fixed rotation crane beams to prevent uncontrolled load rotation	2	1	2	L
Finishing	Explosion & Environmental release	Explosion of Spray Paint cans	Incorrect handling, use & storage of spry paint cans	1. Pre-operational checks on spraying 2. Carefull mixing of cans 3. Carefull placement of cans 4. Communication of explosin hazards (Safety Alert) 5. Flammable storage cabinets 6. Stenciling robot to reduce use of spray cans	2	2	4	L	1. Operator Training 2. Operator competency assessment 3. Auditing of Spray can Handling & use.	2	1	2	L
Finishing	Waste placement of empty paint spray cans to landfill	Spray cans placed in general waste bins	Employees not recycling	1. Spray can recycle bins in usage areas 2. Employee training in recycling	1	3	3	L	1. Reduce spray can usage by spray robot 2. Auditing of Spray can disposal	1	2	2	L
Forklifts/Trucks	Environmental release	Damage to truck fuel/hydaulic systems by dropped or dislodged plate loads during loading or unloading	1. Forklift failure 2. Truck moves dring loading/Unloading 3. Uncontrolled dropping of suspended load (e.g. during braking, hydraulic hose failure etc.)	1. Mobile pre-operation checks 2. Environmental response equipment provided	2	2	4	L	1. Environmental response training 2. Environmental response kits 3. Environbmental Incident response drill	2	1	2	L

Machine / Area	Hazard Type	"What" Can Happen?	"How" Can it Happen?	Current Controls	Consequence	Likelihood	Current Risk Score	Rating	Proposed Controls	Consequence	Likelihood	Current Risk	Rating
Forklifts/Trucks	Environmental release	Exhaust emissions from trucks & mobile equipment	Lack of maintenance to mobile equipment	1, Programmed maintenance on mobile equipment 2, Daily operator start checks	2	2	4	L	NA	2	2	4	L
Furnace	Explosion/ Gas escape	Uncontrolled Explosion/ Release of Gas	1. PLC- Failure of system 2. Failure of light up interlocks	1. Fail safe shutdown 2. Emergency procedures 3. Light up sequence procedur 4.	4	2	8	M	1. Omgoing failsafe testing of combustion systems 2. Improvements to gas system integrity, including gas mains isolation	4	1	4	L
Furnace	Environmental release	Greenhouse gas emmissions (CO2e)	Combustion by-products	1. Routine maintenance & tuning of furnace burners 2. Optimising of Production plans & minimisation of temperature change delays 3. Use of exhaust heat for preheating plates	2	2	4	L	1. Emissions measurements & improvement targets 2. Repair & recommission flue gas analysers	2	1	2	L
Quench Pond	Environmental release	Discharge of contaminated water from Quench pond overflow to storm water	Oils or greases washed out of lubication points in Quench tower	1. Routine maintenance of quench rollers 2. Greasing procedure to prevent overfill 3. Addition of floculant to capture oils & grease in mill scale 4. Analysis of pond water monthly	2	2	4	L	NA	2	2	4	L
Finishing	Waste placement of spent shot media to	Waste shot placed into landfill	Waste shot placed into landfill	1. Recycling of spent shot & dust	1	2	2	L	NA	1	2	2	L
Forklift/Truck	Environmental release	Diesel leak when refuelling mobile equipment	1. Overfilling 2. Truck/Fork moves during refuelling	1. Refuelling area away from drains 2. Environmental response equipment on refuelling truck and on site 3. Environmental Spill kits available	2	3	6	M	1. Environmental response training	2	1	2	L
Chemical Spill	Loss of containment	chemical/solvent/lubricant spill or loss of containment	Leakage during use, storage or transportation	1. MSDS register of all chemicals, solvents, lubricants 2. Bunding of bulk lubricant storage areas 3. Environmental Spill kits available	2	3	6	M	1. Environmental response training	2	1	2	L
Solvent/Lubricant Fire	Fire/explosion	flammible solvent/lubricant fire	Fire during use, storage or transportation of solvents/lubricants	1. All solvents, lubricants stored in flame proof cupboards 2. Fire risks in MSDS 3. Hot work permit system 3. Environmental Spill kits available	2	3	6	M	1. Environmental response training	2	1	2	L

Pre-emptive actions to be taken

Bisalloy has undertaken the following actions to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

1. Provision of Emergency Response equipment, including firefighting, spill response and first aid equipment
2. Regular checking of Emergency response equipment for correct operation
3. Provision of Emergency Response training and supervision to employees
4. Regular Emergency Response drills by all employees
5. Regular meetings of Emergency Planning committee to review potential Emergency situations and to review Emergency drills undertaken
6. Regular meetings of WHS committee, comprising members across all departments and operating shifts
7. Regular housekeeping audits
8. Implementation of an Environmental Managements system complying to ISO 14001
9. Implementation of a Safety Management system complying to ISO 45001
10. Use of Bunded areas and specialised cabinets for storage of dangerous goods
11. Use of a Preventative Maintenance Computer system, to ensure that all Equipment is maintained in proper working order
12. PLC computer systems to control production facilities, including fail safe and emergency stopping protocols
13. Emergency alarms to warn personnel of hazardous situations requiring evacuation
14. The use of permit to work procedures for hazardous work (e.g. hot work, confined space, working at heights, JSA's)
15. Alarms for excessive dust emissions from shot blasters
16. Regular monitoring of furnace flue emissions

Inventory of pollutants

Bisalloy has identified the following potential pollutants on site. Please refer to Dangerous Goods Map (Attachment 1) for marked locations

	Map Ref	Max Quantity	Contents	UN Code	ADG Class	Comments
Leveller	E4	1000 litres	Hydraulic Oil	N/A	N/A	Pumphouse & Leveller fire suppression system in place
South East Building 2	D1	2000 litres	Hydraulic Oil	N/A	N/A	Contained in bunded area & mobile pallet bunds
Transfer table	B2	1000 litres	Hydraulic Oil	N/A	N/A	Contained in hydraulic pump and tank storage
South East Building 2	D1	40 litres	Hydrochloric Acid	1789	8	Contained in bunded area
Maintenance workshop	C7	1000 litres	Greases & Solvents	Various	Various	Storage in 4 x 250L flameproof cabinets
Testing Laboratory	C7	40 Litres	Methylated Spirits	1170	3	Storage in bunded cupboard
Testing Laboratory	C7	2.5 litres	Nitric Acid	2031	8	Storage in 1 x 50L corrosives cabinet
Plate Finishing	E4	1000 litres	Spray paint cans & packed paint	1950	2.1	Storage in 4 x 250L flameproof cabinets
Plate Finishing - outside	D4	8.9m^3	Oxygen Cylinder	1072	2.5	Outside storage in rack
Plate Finishing - outside	D4	7.0m^3	Acetylene Cylinder	1001	2	Outside storage in rack

Plate Cutting	C2	127m^3	Oxygen Cylinders Manpack	1072	2.5	Outside storage in manpack
Plate Cutting	C2	45Kg	LPG Cylinder	1075	2	Outside storage in rack
Plate Cutting	C2	350 litres	Spray paint cans & packed paint	1950	2.1	Storage in 1 x 350L flameproof cabinet
Plate Finishing	E4	300 litres	Diesel	3082	9	Static storage in backup generator – Outside western wall
Building 1	E6	880 litres	Diesel	3082	9	Static storage in backup generator
Mobile Equipment – Diesel	NA	122 litres	Diesel	3082	9	Mobile storage in BIS 1 truck
Mobile Equipment – Diesel	NA	257 litres	Diesel	3082	9	Mobile storage in BIS 2 truck
Mobile Equipment – Diesel	NA	190 litres	Diesel	3082	9	Mobile storage in Omega 12T forklift
Mobile Equipment – Diesel	NA	100 litres	Diesel	3082	9	Mobile storage in Komatsu 4T forklift
Mobile Equipment – Diesel	NA	257 litres	Diesel	3082	9	Mobile storage in Hyster 3T forklift

	Map Ref	**Max Quantity**	**Contents**	**UN Code**	**ADG Class**	**Comments**
Water cooling towers (3 off)	D6,C 4	150 litres	Biocide (NCH MB-215)	3265	8	2x25 litre drums at each tower in sealed boxes
Water cooling towers (3 off)	D6.C 4	162 Kg	Biocide (NCH Bromax 10.2)	1719	8	2x27kg drums at each tower in sealed boxes

Location/Tank	Map Ref	Max Quantity	Contents	UN Code	ADG Class	Comments

Sinto Blaster baghouse	H7	2000 Kg	Blaster Dust	N/A	N/A	2 x 1 tonne bulk bags
Granowski Blaster baghouse	C2	2000 Kg	Blaster Dust	N/A	N/A	2 x 1 tonne bulk bags
Building 2 South End	B1	12 000 Kg	Blaster Dust	N/A	N/A	Up to 12 x 1 tonne bulk bags awaiting pick-up
Maintenance workshop	C7	500 litres	Greases & Solvents	Various	Various	Storage in 2 x flameproof cabinets
Maintenance workshop	C7	500 litres	Paints & Solvents	Various	Various	Storage in 2 x flameproof cabinets
Maintenance workshop	C7	8.9 m^3	Oxygen Cylinder	1072	2.5	storage in mobile cart
Maintenance workshop	C7	7.0 m^3	Acetylene Cylinder	1001	2	storage in mobile cart
Maintenance workshop	C7	4.9 m^3	Weld Gas NOS (CO_2, Ar,O_2)	1956	2	storage in mobile cart
B2 West Wall	E6	127 m^3	Oxygen Cylinders Manpack	1072	2.5	Outside B2
B2 West Wall	E6	10.7 m^3	Weld Gas NOS (CO_2, Ar,O_2)	1956	2	Outside B2
B2 West Wall	E6	44.5 m^3	Oxygen Cylinders x 5	1072	2.5	Outside B2
B2 West Wall	E6	60 Kg	LPG Cylinders x 2	1075	2	Outside B2
Lunchroom Pergola BBQ	B4	15 Kg	LPG Cylinder	1075	2	Outside storage in connected to BBQ

Safety equipment

Bisalloy has in place the following safety equipment and devices used to minimise the risks to human health or the environment and to contain or control a pollution incident. See Site Equipment Map (Attachment 2) for marked locations:

Equipment	Map Ref	Rating/ Standard	Manufacturer/Inspection	Model	Comments
Firefighting - Hose Reels (x9)	Various	AS/NZS 1221	Wormald	Various	Tested & tagged to AS1851 (Ord. 70 4.5l/sec 275 KPa)
Fire Extinguishers (x35)	Various	AS/NZS 1841	Wormald	Various	Tested & tagged to AS1851
Firefighting – Fire Blankets	Various	AS/NZS 3504	Wormald	Various	Tested & tagged to AS1851
Firefighting – leveller deluge sprays	Various	AS/NZS 1221	Wormald	Various	Tested & tagged to AS1851 (Ord. 70 4.5l/sec 275 KPa)
Spill Kits (x11)	Various	ISO 14001	Absorb Environmental	ASK240	Inspected & replenished 3 monthly
Drain Cover	E6	N/A	Absorb Environmental	PSI1205	Outside storage NW corner Building 2
First Aid Kits (x9)	Various	N/A	Accidental Health & Safety	Various	Contents and Service to Safework NSW COP SWO8836
Defibrillators (x2)	D4,C7	N/A	Defibtech - Lifeline	VIEW	Defibrillators kept in unlocked, alarmed cabinets
Emergency Stations	D4, F6	N/A	Various	Various	Stations include isolation bollards & barrier tape
Back-up Generators	E6, C4, E3	N/A	Various	Various	Generators in locations C4,E6 are diesel powered Generator in location E3 is Natural Gas powered
Portable Gas Metres (x3)	F5	AS/NZS 60079	BW Technologies – Gas Alert	Quatro	Stored in confined space rescue gear cupboard
Confined Space rescue equipment	F5	AS2865	Various	Various	Stored in confined space rescue gear cupboard

Communicating with neighbours and the local community

Occupiers of adjacent properties are to be advised of Environmental Incidents as soon as practical by phone call. This is to be done by the Incident Manager after notification of the incident. If phones are unanswered, a company representative will be sent to adjoining property owners by the Incident Manager.

Adjoining neighbours are also to be provided with regular updates by the Incident Manager by phone, in conjunction with responding Emergency services. This is to be done at each stage of incident escalation or each stage of incident recovery and final resolution.

If unable to contact occupiers of adjacent properties, the Incident Manager will delegate for a company representative to doorknock and update sent to adjoining property occupiers as appropriate.

Site specific information is provided to the local community so it can minimise the risk of harm by the following means:

1. Complaints Telephone number (02 4272 0499) is hosted on the Bisalloy corporate website: www.bisalloy.com.au
2. Bisalloy Pollution Incident Response Management Plan is hosted on Bisalloy corporate website: www.bisalloy.com.au
3. Hazmat signage and emergency information manifests placed at main gate entrance.

Minimising harm to persons on the premises

Bisalloy has in place the following arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out

1. Emergency evacuation procedures, and regular Emergency Evacuation drills, involving all employees
2. Provision of two Emergency Evacuation Areas (Main and alternative)
3. Provision of suitably trained, qualified, and experienced Emergency Wardens
4. Provision, maintenance and training in the use of Emergency Response equipment
5. Provision of suitably trained, qualified, and experienced First Aid respondents
6. Provision and maintenance of suitable First Aid equipment

Maps

Bisalloy has provided detailed maps as attachments to this PRIMP documenting the following information:

- Attachment 1: Shows locations on Emergency Response Equipment, including fire-fighting, spill response and first aid equipment
- Attachment 2: Shows location of neighbouring properties
- Attachment 3: Shows locations of stormwater drains on the premises and direction of flows
- Attachment 4: Shows locations of surrounding area stormwater facilities
- Attachment 5: Shows list of Emergency Evacuation wardens

Actions to be taken during or immediately after a pollution incident

Bisalloy has in place Emergency plans, including the following actions to be taken immediately after a pollution incident to reduce or control any pollution. These include the following actions:

1. Identify the source of pollution
2. Isolate or shut off source of pollution if possible
3. Place containment equipment around any liquid spills to prevent spread
4. Determine the magnitude of the environmental threat. This includes the nature of the pollution, the amount released, and likelihood of escape from the premises
5. Activation of Evacuation alarms if necessary, for the protection of personnel from potential harm
6. Upon activation of Emergency alarm, Emergency evacuation wardens to ensure orderly evacuation of all personnel, visitors & contractors to Emergency assembly point. Attachment
7. Request for assistance from external Emergency services providers
8. Activation of Emergency plans through escalation to the Bisalloy Chef Emergency Warden
9. Notification to occupiers of adjacent properties and community of the nature and extent of the Environmental threat
10. Containment and clean-up of the Environmental release
11. Root cause analysis and preventative actions to ensure prevention of future release
12. Debrief of personnel, occupiers of adjoining properties and community, communicated by letter drop
13. Debrief by Bisalloy Emergency Planning Committee (EPC), and corrective actions implemented
14. Conduct of an Emergency response drill, conducted and documented within 1 month of any major Environmental release

Bisalloy has in place Emergency plans, including the following actions to identify risk of harm to human health, and reduce that risk by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk:

1. Identify the type of pollution
2. Isolate or shut off source of pollution if it is possible to do without physical contact with the substance
3. Consult Material Safety Data Sheets on Bisalloy SharePoint system for appropriate PPE and handling instructions
4. Determine the magnitude of the environmental threat. This includes the nature of the pollution, the amount released, and likelihood of escape from the premises
5. If type of pollution cannot be identified, or if Safety Data Sheets are unavailable, call external emergency services on 000 for assistance. Activate Emergency alarms and remove all personnel from areas of potential exposure to the substance. Chief Emergency Warden to be called as soon as practical for further advice and assistance. Occupiers of adjoining properties to be advised as soon as practical if there are potential impacts beyond boundaries of property.
6. If nature of substance is known, and appropriate Personnel Protective Equipment and containment equipment is available, shift Team Leaders to co-ordinate clean-up and reporting to Chief Warden as soon as practical.

7. Chief Warden to arrange appropriate support for clean-up, disposal of pollutants, and independent confirmation of decontamination
8. Subsequent incident investigation to recommend improvements to systems and equipment to reduce risk of harm to human health
9. Debrief of personnel, occupiers of adjoining properties and community, including offer of medical support through the company's EAP program.
10. Debrief by Bisalloy Emergency Planning Committee (EPC), to recommend improvements to systems and equipment to reduce risk of harm to human health
11. Conduct of an Emergency response drill, conducted and documented within 1 month of any major Environmental release, including testing of improvements to systems and equipment to reduce risk of harm to human health

Bisalloy will undertake the following actions in combating pollution caused by any incidents. Any clean-up and associated funding resulting from an incident will be undertaken as follows:

1. Initial responder to Identify the type of pollution if possible
2. Initial responder to contact Shift Emergency Warden (Team Leader), then Isolate or shut off source of pollution if it is possible to do without physical contact with the substance
3. Consult Material Safety Data Sheets on Bisalloy SharePoint system for appropriate PPE and handling instructions
4. Shift Emergency Warden is to determine the magnitude of the environmental threat. This includes the nature of the pollution, the amount released, and likelihood of escape from the premises

5. If type of pollution cannot be identified, or if Safety Data Sheets are unavailable, Shift Emergency Warden is to call external emergency services on 000 for assistance. Activate Emergency alarms and remove all personnel from areas of potential exposure to the substance. Chief Emergency Warden to be called as soon as practical for further advice and assistance. Occupiers of adjoining properties to be advised as soon as practical if there are potential impacts beyond boundaries of property.
6. If nature of substance is known, and appropriate Personnel Protective Equipment and containment equipment is available, shift Shift Emergency Warden (Team Leader) to co-ordinate clean-up and reporting to Chief Warden as soon as practical.
7. Chief Warden to arrange appropriate support for clean-up, disposal of pollutants, and independent confirmation of decontamination using approved contractors if appropriate.
8. Funding for pollution response and clean-up costs will be arranged through the Company's expense management system
9. Bisalloy has in place a pollution complaints phone line (02 4272 0499) which is manned 24 hours per day during plant operation. The procedure for managing Pollution Complaints is appended to the PIRMP as Appendix 7

Coordinating with persons

The following communication and escalation procedures are in place at Bisalloy for coordinating with the authorities and/or notifiable parties:

All communications to internal and external stakeholders are in the first instance are to made through the Chief Warden (or his nominated deputy). The Chief Warden will escalate enquiries and communications to Senior Management and Company officers as required;

Contact details for the Chief Warden are as follows:

Managing response to pollution incident

Name of person responsible:	Jose Cabello
Position or title:	Engineering and Maintenance Manager
Business hours contact number/s:	(02) 4272 0427
After hours contact number/s:	0437 648 688
Email:	jose.cabello@bisalloy.com.au

Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

Training Date	Trainer	Trainees	Details of Training /Issues identified	Next scheduled training date
14/05/2020	S Wilson (Production Mgr)	Tower Operators Team Leaders	Procedure for handling pollution complaints (EPA hotline)	May 2022
14/05/2020	S Wilson (Production Mgr)	Team Leaders Chief Emergency Warden	Familiarisation with PIRMP process	May 2022

Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

Detail the manner in which the plan is to be tested and maintained to ensure 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:

Below are details on tests carried out the PIRMP, including the testing dates and the names of all staff members who carried out the testing):

Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
17/09/2021	J. Cabello	Oil Spill Simulation	Update of on-site PIRMP Checklist Form	17/09/2022
13/5/2020	J Cabello (Maint Mgr) I Green (SQE Mgr) D McLeod (Forklift Driver)	Simulation – spill of oil drum from forklift	Suggestion to include barrier tape in spill kits (see attachment 6 for details)	13/05/2021

PIRMP update details

Date update occurred	Reason for update	Details of updates	Date the updated version uploaded to website (if applicable)	Date of completion
16/05/2022	Changes of Personnel	S. Wilson replaces M. Enbom	After 17/05/22	TBA

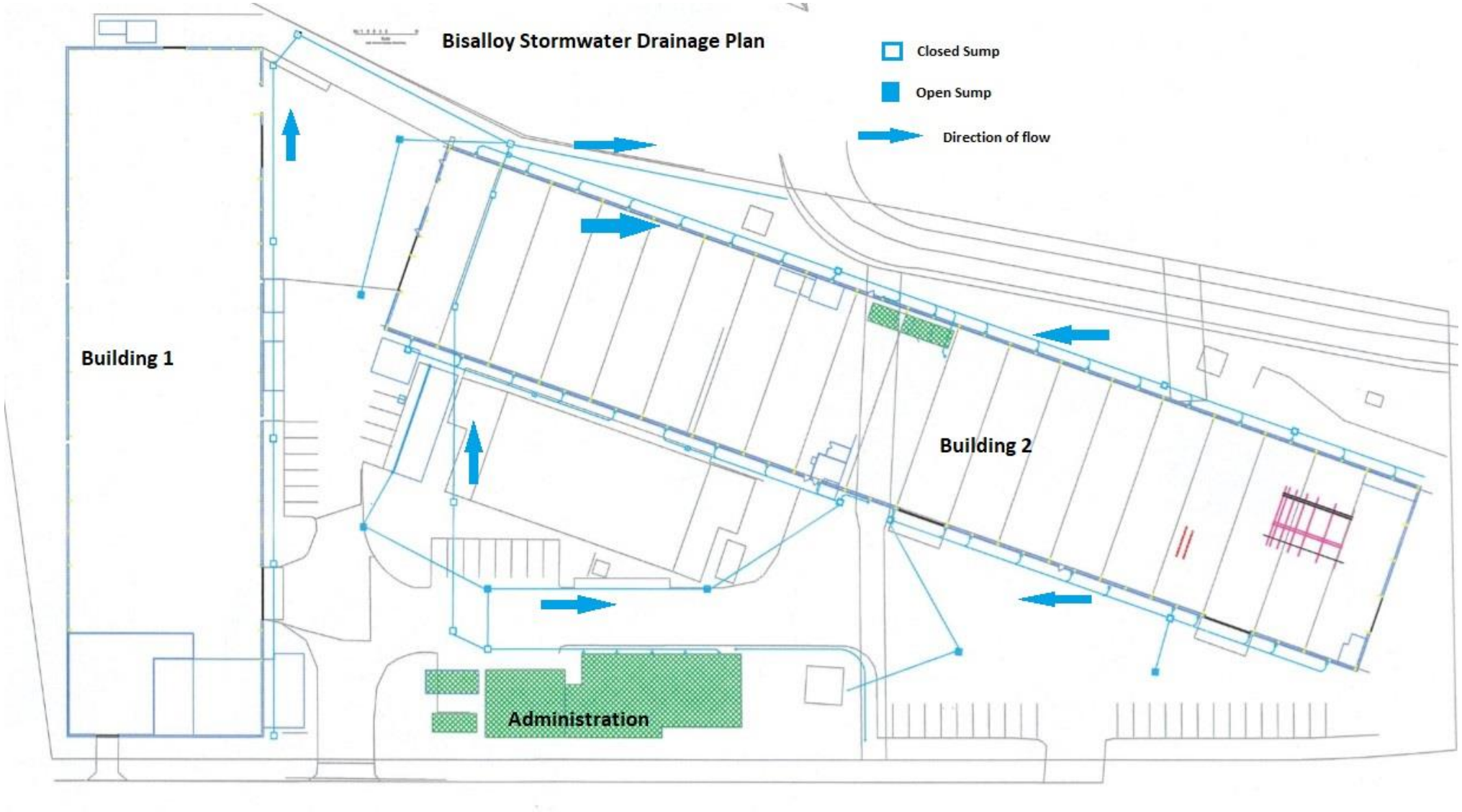
07.07.2020	New Document	New Document	07/07/2020	07/07/2020
14/05/2021	Contact details revised	Annual submission review	14/05/2021	14/05/2021

17/09/2021 Update of contact numbers DGL / Hydromet Change of contact details

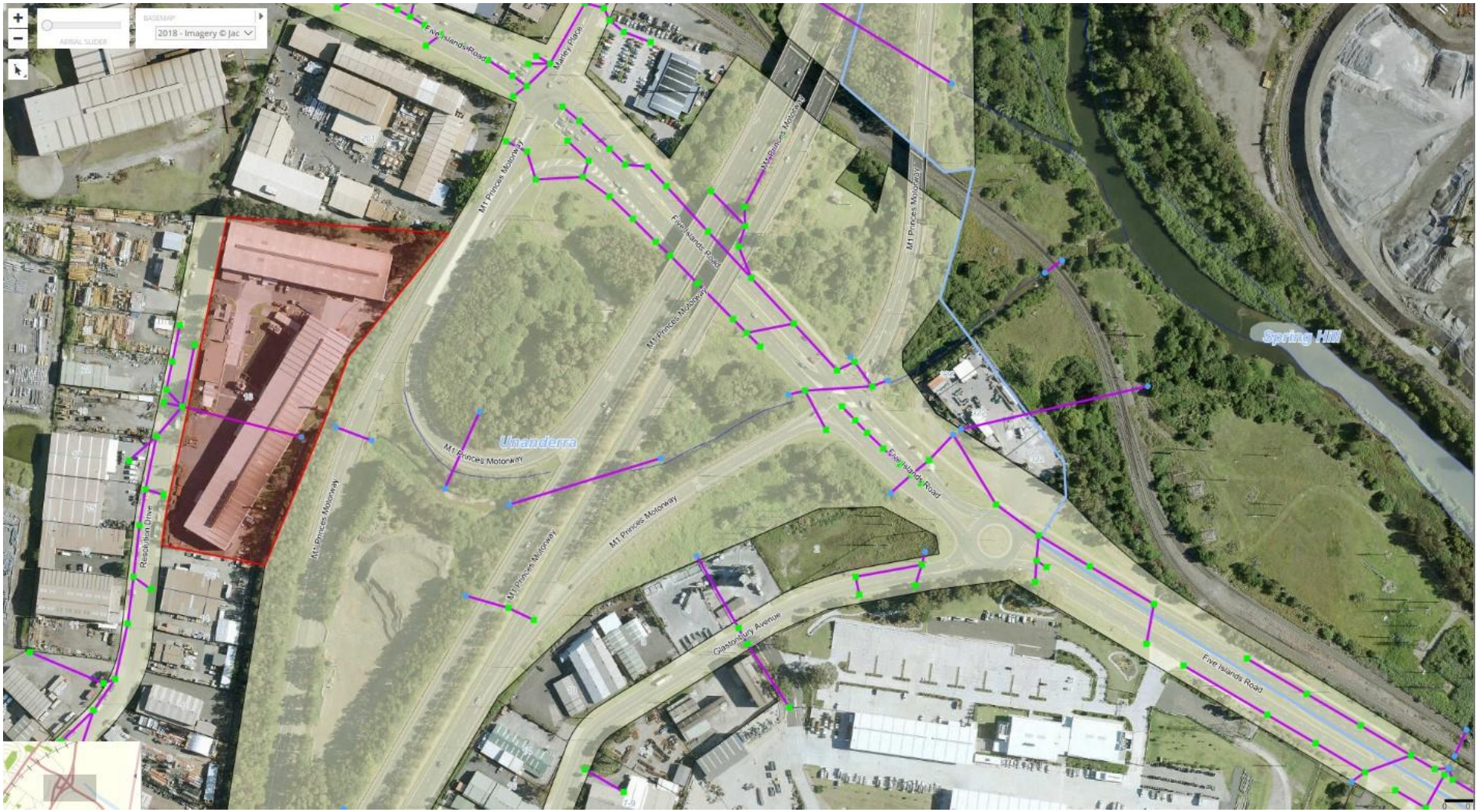
Attachment 1: Bisalloy Emergency Equipment Map

Attachment 2: Bisalloy Neighbouring Properties Map

Attachment 3: Bisalloy Site Drainage Map



Attachment 4: Wollongong City Council Stormwater Assets - Local Area Drainage Map



Attachment 5: Bisalloy Emergency Wardens

WARDEN CLASSIFICATION	PRIMARY WARDEN	BACKUP WARDEN	AREA
CHIEF	Jose Cabello	Andrew Wilkinson	Maintenance
Evacuation	Team Leader 1	Team Leader 2	Production
Area	Adrian Tavan	Adam Williams	Admin/ICT
Area	Dake Yu	Greg Check	Technical
Area	Mick Reay	Manu Tunga	Laboratory
Area	Rob Mace	Shift Fitter	Contractors
Area	Breda Slevin	Stephen Quinn	Main Office
Area	Material Control Co-ordinator	Material Control Operator	Despatch

1. The following employees play a vital role if an evacuation is required.

CHIEF

Jose Cabello: Chief Fire Warden

The role of the Chief Fire Warden is to coordinate with the emergency services.

EVACUATION

Shift Supervisors: Fire Warden

The role of the Evacuation Fire Warden is to coordinate the evacuation and account for all personnel at the assembly area.

AREA

Emergency Evacuation Wardens

The role of the Area Emergency Evacuation Warden is to account for the employees within their work area at the assembly point.

2. Accounting for employees and visitors at the assembly area:

a. Area Emergency Evacuation Wardens will advise the Chief Warden that all employees from their work area are present.
b. The Chief Warden will check the sign-in list obtained from the Swiped-On website and ensure all visitors/contractors are accounted for.
c. Once all employees and visitors/contractors have been accounted for and the Chief Warden / Fire warden advises the area is safe, employees can depart the assembly area.

Attachment 6: Bisalloy Pollution Emergency Response Drill held 13 May 2020

Bisalloy	Wardens Report Safety Drill – 13 May 2020		Date: 13 May 2020 File:safety drill report 13may20
Author:	J. Cabello	Attendees: Dale McLeod (Forklift driver) Ian Green (SQE Manager) Jose Cabello (Maintenance & Engineering Mgr)	Attention: I. Green, Safety Wardens, M. Enbom
Dist:		Security:	Internal

Team,

A safety drill scenario was executed successfully today. The scenario used was that of forklift carrying a drum of oil was dropped in the front driveway area of Building 2. The driver was only advised of the scenario just as he arrived at the scene and was not given any other advice other than to react as if it were for real.

Result:

The driver, immediately stopped the forklift, took in the scene, and brought in the nearest spill kit. Within minutes he had bunded off the downstream side of the spill to prevent entry into the adjacent drain

He then sought out and placed safety bollards on the extremities of the spill and then taped the area off.

By not moving the forklift, he preserved the incident site so that it could be properly investigated later.

Once the spill was under control, he was asked what his next steps would be, and he responded it would be to advise his team leader.

Although the drill was terminated at this point, it would be expected that the team leader would then take over control of the situation and with his own assessment, provide additional controls, escalate control of the incident an din all circumstances, advice the warden and complete a Bis Safe Incident Report.

Other Key learnings:

Perhaps greater consideration of the drain could be done with more bunding around it because the spill on the ground can always be cleaned up, but once its in the drain, it's almost impossible

The warning tape to be included in the spill kits. Dale had to search in the cutting area for a roll.

Attachment 7: Bisalloy Pollution Complaints Procedure (Pages 1-3)

Pollution Complaints Procedure

1. Scope

This procedure describes the processes to be followed in receiving, recording and responding to pollution complaints lodged by members of the public. This procedure applies to all employees of Bisalloy Steels including part-time staff, casuals, contractors and consultants.

2. Introduction

Bisalloy holds a licence to operate under provisions of the Protection of the Environment Operations Act (POEO Act 1997). There is a requirement under this licence to receive, record respond and retain details of pollution complaints raised by members of the public. Failure to comply with these requirements constitutes a breach of Bisalloy's EPA licence to operate.

3. Purpose

Following this procedure will ensure that Bisalloy complies with licence conditions relating to pollution complaints handling processes.

4. Definitions

Pollution complaints phone line: Dedicated phone line (02) 4272 0499 This is switched through to Tower during operational hours. This phone number is hosted on the "Contact Us" page of the Bisalloy website.

Complaints Record: This is a form which is used to record Date & Time of complaint; The method by which complaint was made; Contact details for complainant; Nature of the complaint; Actions taken in response to the complaint; Follow-up contact to the complainant (See Attachment 1 for blank form)

5. Procedure

A. Receival of complaint

Usually complaint will be received from members of the public via the Environmental Complaints phone line (02 4272 0499). This phone line is switched through to the Tower during operational hours.

When responding to pollution complaints, the operator is to follow voice prompts on the complaints record form (Attachment 1) to ensure that all required information is conveyed and recorded.

B. Recording of complaint details

The following information is required to be recorded:

- Date & time of complaint
- Method of Lodgement
- Complainant contact details
- Nature of complaint
- Actions taken
- Follow-up contact to complaint

C. Response to complaint

After all complaint details are received and recorded, Tower operator is to contact Shift Team Leader to investigate the nature and extent of the complaint, and to initiate corrective actions as required.

D. Response to complaint

Shift Team Leader is to investigate the complaint, and implement corrective actions as required. Corrective actions may include the following:

- Containment and clean-up of minor spills by shift personnel
- Shut-down of operational activities
- Escalation of the complaint to support staff
- Enaction of the Bisalloy Pollution Incident Response Management Plan (PIRMP)
- Site Evacuation
- Call-in of Emergency Services support

E. Corrective Actions

Where the Shift Team Leader is able to contain and respond to the incident on shift, details of action taken are to be recorded on the **Complaints Record** form (Attachment 1). Where situation cannot be resolved on shift, details of escalation are to be recorded on the **Complaints Record** form. Details from the complaints record form are to be logged in Bisafe system as an incident

F. Follow up to Complainant

Where the complaint is of minor nature, and the Shift Team Leader is able to contain and respond to the incident on shift, feedback is to be given to be complainant as soon as practical by the Team Leader using phone contact.

Where the complaint is of major nature, and the Shift Team Leader is unable to contain and respond to the incident on shift, feedback is to be given by support staff to the complainant as soon as practical by phone.

5. Revision History

23.6.20 New Document

Pollution Complaints Form

Pollution Complaints Telephone hotline number: (02) 4272 0499

Dialogue to use when answering phone:

"Thank you for calling the Bisalloy Steels Pollution complaints phone line."

"I will ask a series of questions, so that we collect the required information to assist with your enquiry"

"Bisalloy has commitments to investigate, rectify and report Pollution Complaints under the Protection of the Environment Operations Act, and our Environment Protection Licence number 21398"

a. Date of Complaint: _____ Time: _____

b. Method of Lodging Complaint Phone / Other (specify) _____

(following fields are to be asked from caller)

c. Name of person lodging complaint: _____Contact Details: _____

d. Nature of the complaint: _____

_____

_____

e. Actions taken on complaint: _____

_____

_____

Name of person logging complaint: _____

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