Clingcast metals

98 Bath Road, Kirrawee. NSW.

EPA Licence No. 21514

At Clingcast Metals we take a responsible attitude towards the environment, as well as the safety and well-being of our staff, visitors, and the community in which we live and work.

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
LICENCE NUMBER: 21514

Approved by: Megan Miller **Signature:**

Position/Title: Company Representative **Date: 2021**

PURPOSE:

Clingcast Metals Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Clingcast Metals Pty Ltd. 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 the licensed premises, 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 must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

Environment Protection Licence (EPL) Details	
Name of licensee: **ABN: 13 002 537 537**	Clingcast Metals Pty Ltd
EPL number:	21514
Premises name and address:	98 Bath Road Kirrawee, NSW 2232
Company or business contact details	**Name:** Simon Clingan **Position or title:** General Manager **Business hours contact number/s:** 02 9521 1382 **After hours contact number/s:** 0418 771 121 **Email:** simon@clingcast.com.au
Website address:	www.cligcast.com.au
Scheduled activity/activities on EPL:	Metallurgical Activities Waste Storage
Fee-based activity/activities on EPL:	Metal Processing Waste Storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste Scale – 0-100000 T annual processing capacity. Any listed waste type stored
Pollution incident – person/s responsible	
PIRMP activation	**Name of person responsible:** Scott Swindale **Position or title:** Foundry Manager **Business hours contact number/s:** 02 9521 1382 **After hours contact number/s:** 0417 600 901 **Email:** scott@clingcast.com.au

Pollution incident – person/s responsible, continued	
Notifying relevant authorities .	**Name of person responsible:** Megan Miller **Position or title:** Company Representative & Office Manager **Business hours contact number/s:** 02 9521 1382 **After hours contact number/s**: 0408 999 899 **Email:** megan@clingcast.com.au
Managing response to pollution incident	**Name of person responsible:** Simon Clingan **Position or title:** General Manager – Recycling Operations **Business hours contact number/s:** 02 9521 1382 **After hours contact number/s:** 0418 771 121 **Email:** simon@clingcast.com.au **Name of person responsible:** Scott Swindale **Position or title:** Foundry Manager – Foundry Operations **Business hours contact number/s:** 02 9521 1382 **After hours contact number/s:** 0417 600 901 **Email:** scott@clingcast.com.au

Notification of relevant authorities

Fire & Rescue NSW / Rural Fire Service	**Contact number/s:**	000 (first), 13 27 01
EPA	**Contact number/s:**	131555
NSW Health	**Relevant Area Health Service:** **Contact number/s:**	Sutherland Hospital 02 9540 7111
SafeWork NSW	**Contact number/s:**	13 10 50

Notification of relevant authorities, continued

Local authority/s Sutherland Shire Council.	**Contact number/s:**	02 9710 0333
Sutherland Fire Station & Sutherland Police Station	**Contact number/s:**	02 9542 0899, 9542 0899

Notification to neighbours and the local community

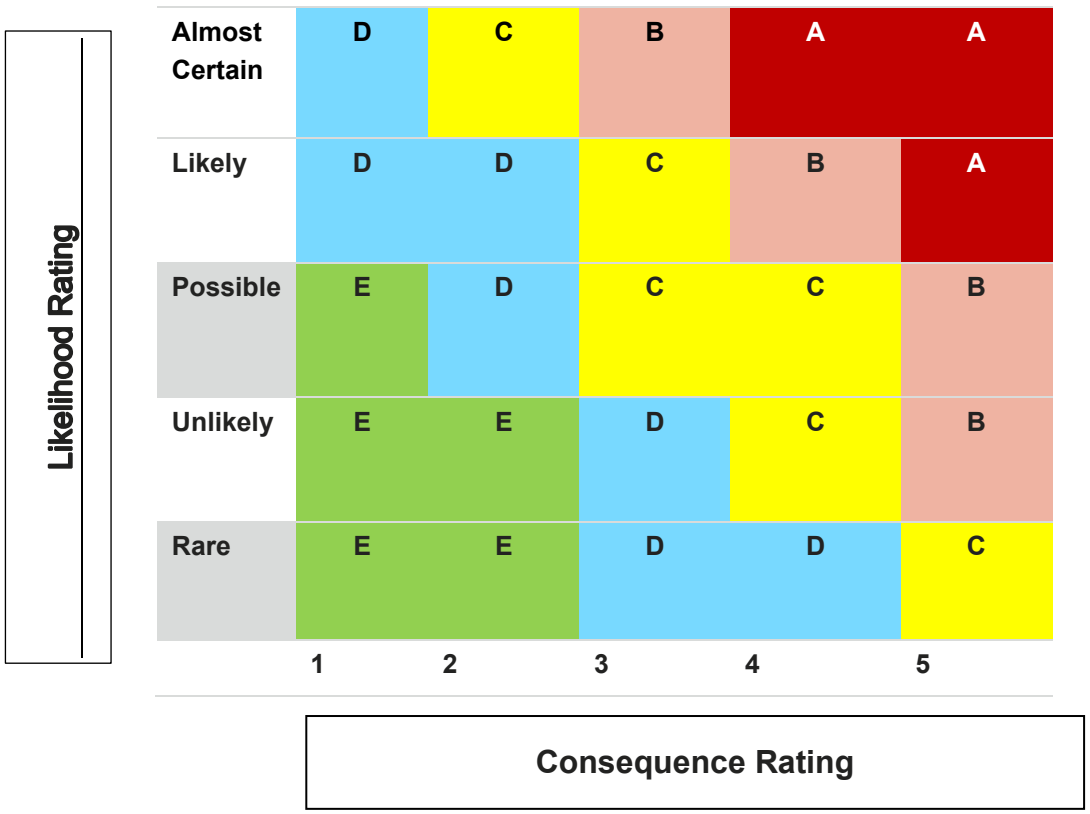
- Alexander Perrie & Co 9542-3711 90-96 Bath Rd
- Home Specialty Coffee 0408 999 565 1/100 Bath Rd
- Matt Keene Electrical 9521 2869 2/100 Bath Rd
- Complete Façade Solutions 9521 3311 3/100 Bath Rd
- Spano Rail Maintenance 8522 3000 4/100 Bath Rd
- A.J. Grant IT 8502 3691 389 Boulevard Rd

All pollution incidents that extend beyond site boundaries and cause, or threaten to cause, harm to people, property or the environment, Clingcast Metals will seek advice from emergency services and authorities to notify all relevant neighbours by a suitable method appropriate to the situation. All direct neighbours listed above, most likely to be impacted by a pollution incident will be contacted immediately by Megan Miller or Simon Clingan.

Description and likelihood of hazards

Potential Pollutants ⇨	Fire	Transformer Oil Spill /Leak	Air Pollution Emissions	Noise
QTY	5m^2	20,000 L	Airflow 18 m^3/sec Air Velocity 15m/sec (vertical)	
Location	Foundry Shed Building 2	Back righthand corner of yard Building 3	Back of yard boundary fence line – middle location	Building 3 first work station
Hazards/Risks Human Health Environment	Smoke inhalation Contamination of air with smoke Possible burns Fire spreading to neighbouring properties	Entering stormwater drains and contaminating waterways Soil Contamination	Toxic chemicals in the air we breathe. Contaminating plants and wildlife	Hearing damage
Consequence – People Environment	Smoke inhalation, Burns to the human body Stinging Eyes Can kill plants and wildlife	Irreparable harm to humans including liver damage & decreased immunity Can kill plants and animals	Human health: heart disease, respiratory infections, asthma, lung disease. Damage to plant vegetation and harm wildlife	Damaged ear drum, Ringing in the ear
Likelihood of incident	4C	4C	3D	1E
Risk Assessment	Unlikely	Unlikely	Unlikely	Unlikely
Conditions/Events Contributing to Likelihood	Sparks from the furnace Flammables Chemicals Furnace Explosion	Holding tank overflow when transferring, tank leak, bund storage pierced	Power shortage, Cracks in ventilation pipes, Valve / machinery malfunction,	Faulty equipment,
Pre-emptive Control Measures	Keep all goods that are flammable & fire fuel away from the furnace area	Preventative maintenance checks of bunded oil storage tanks and drums. Implementing a minimal traffic zone in the oil storage areas	Seal the plant area associated with foundry casting plant area, this ensures the area is under negative pressure to minimise fugitive emissions. Baghouse extension of stack height & regular emissions testing reports by Ektimo P/L	Installing noise reduce grinding discs. Fitting suitable silencers to compressed airlines.

			Installation of pollution extraction system	
Safety Equipment Infrastructure	Fire hydrant Fire Extinguishers Fire Hose reel Fire Alarm PPE- respiratory masks, safety masks & clothing	Bunded area. Oil Spill kits easily accessible	PPE – respiratory masks to prevent inhalation, safety glasses to protect eyes. STOP Production immediately	Noise cancelling ear muffs and safety ear plugs
Mitigation Actions Post-Incident	Emergency response plan -Fire Application of fire extinguishers by trained personnel Segregation of material to prevent escalation e.g., patterns & hazardous chemicals	Contain at source & isolate the oil spill immediately Use spill kit absorbent material. Place drain seal covers over stormwater drains	Cease working and shut down all machinery. Locate fugitive emissions leak and contain & repair the problem.	Shut down machines
Measures to minimise health effects Post Incident	Firefighting from a safe distance Stand upwind to prevent inhalation /face masks for protection	PPE-Wear chemical resistant gloves, covered footwear, safety eyewear & face mask	Evacuate all staff and direct them up wind to prevent inhalation and wear respiratory masks and safety eyewear	Noise cancelling ear muffs and safety ear plugs
Measures to minimise impact on environment on site Post Incident	All foundry men trained in fire fighting	Removal of contaminated soil & waste from site. Remediation works	Remediation work on the specific cause of incident	Consideration to the surrounding environment is recognized by limiting hours of operation
Contacting Neighbours of dangers	Contact all neighbouring businesses by phone or door knock when significant smoke over boundaries and impacting neighbouring buildings & Fire is spreading. Sound fire alarm	N/A	Contact neighbours by phone or door knocking instructing to stay indoors and shut all windows and doors and to wear masks and safety eyewear	
Specific Instructions	Out of control fire call 000 Fire and Rescue Sound the fire alarm Evacuate all persons from the building	If unable to contain the spill call 000 immediately and notify neighbouring businesses by phone or door knock	Suppress the fugitive emissions	


Likelihood Rating
Almost Certain
D
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Likely
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C
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Possible
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B
Unlikely
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E
D
C
B
Rare
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E
D
D
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4
5
Consequence Rating

Likelihood Rating	Criteria
Almost Certain	>99% probability, or Expected to occur in most circumstances, orcould occur within "days to weeks", or Will occur repeatedly without corrective action being taken
Likely	50-99% probability, or Will probably occur in most circumstances, or could occur within "weeks to months"
Possible	20-50% probability, or might occur sometime, or Could occur within "months to years"
Unlikely	1-20% probability, or Could occur but would not be expected, orcould occur in "years to decades"
Rare	<1% probability, or Occurrence requires exceptional circumstances, or occur as a "100-year event"

Inventory of Pollutants

Product	Classification	Quantity	Location
"Fenotec 810" Liquid Resin	Hazardous Corrosive '8'	1250kg drum.	Hazardous Bunded (6)
"Fenotec H20"	Hazardous	240kgs drum	Hazardous Bunded (6)
Fenotec H5	Hazardous	225kgs	Hazardous Bunded (6)
"IMS 95" Liquid Ethanol	Flammable	203 litre drum	Flammable Store (5)
"Castcleen" Dry Granules	Non-Hazardous	240kg Drums (4)	Non-Hazardous (7)
Refractory Paste Corefix 900	Non-Hazardous	78 tubes	Non-Hazardous (7)
Refractory Cement	Non-Hazardous	25kg bag	Non-Hazardous (7)
Zircoat Satin Paint	Flammable	5 pales	Flammable Store (5)
Carbon Powder	Non-Hazardous	1 Tonne maximum	Non-Hazardous (7)
Ferro Silicon Granules	Hazardous	900kgs	Hazardous Store (7)

LPG Gas Cylinders	Flammable	8 Cylinders 45kgs	Flammable Store (8)
PCB Free Transformer Oil	Flammable	Bunded 20,000 L	Bunded in Building (3)

Safety equipment

Fire > Fire Hydrant, Fire Extinguishers, Fire Hose Reel, Fire Alarm, PPE – Respiratory Masks, Safety Gloves, Safety Eyewear and Protective Clothing
Oil Spill > 6 Oil Spill Kits, Stored Oil Bunded, Stormwater Drain Covers, PPE - Respiratory Masks, Safety Gloves, Safety Eyewear and Protective Clothing
Pollutant Air Emissions > Baghouse Air Emission Monitoring System, Sealed Casting Bay, PPE - Respiratory Masks, Safety Gloves, Safety Eyewear,Protective Clothing
Noise > Noise reduce grinding discs, silencers for compressed airlines, PPE- Ear Muffs, Ears Plugs

Communicating with neighbours and the local community

Door Knock & Phone Call directly affected neighbours
Fire – Stay Inside, close all windows and doors, wait for Fire & Rescue instructions
Air Pollution Emissions – Stay inside, close all windows and doors, wait for Fire & Rescue instructions

Minimising harm to persons on the premises

Induction of all safety procedures for staff & visitors
Correct/appropriate PPE – Respiratory Masks, Protective Eyewear & Ear Plugs

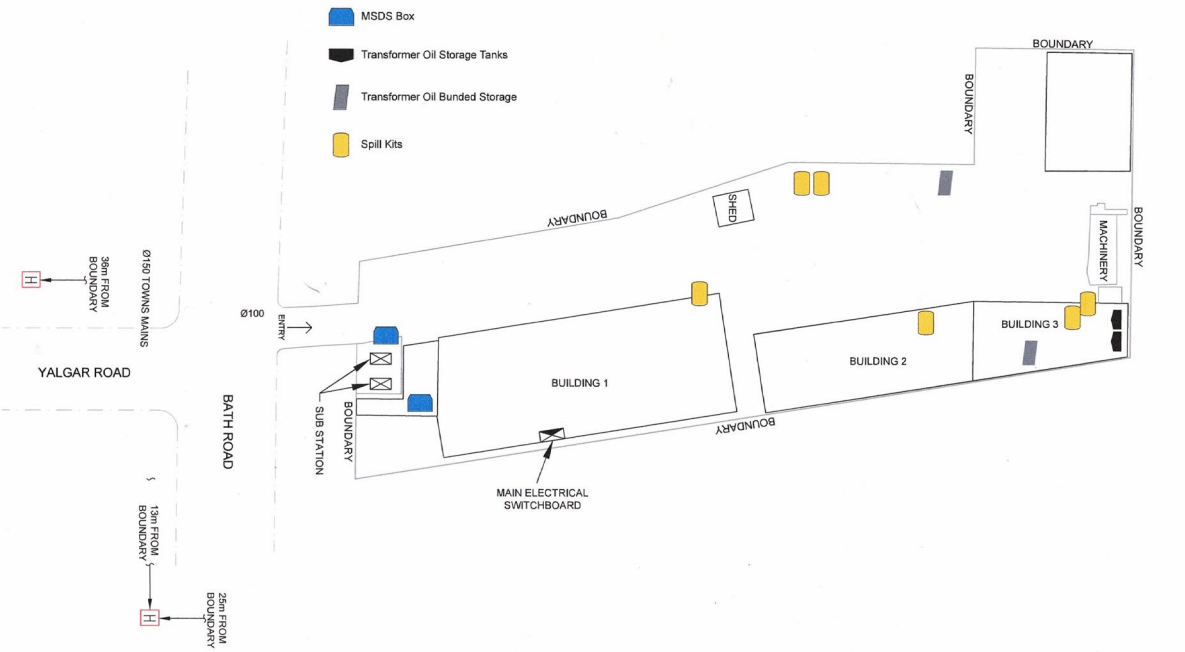
BLOCK PLAN

98 BATH ROAD, KIRRAWEE, NSW, 2232

Transformer oil Storage & Spill Kit Locations

Clingcast metals

98 Bath Road
Kirrawee NSW



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98 BATH ROAD, KIRRAWEE, NSW, 2232

Emergency Evacuation

Clingcast metals

98 Bath Road
Kirrawee NSW

NOTES (H)

1. HEIGHT OF HIGHEST HYDRANT ABOVE BOOSTER: 3.0 MTR
2. SYSTEM DESIGN: AS 2419.1-2005
3. MIN. SYSTEM REQUIREMENTS: 20 l/s @ 250kPa (10 l/s AT 2 MOST DISADVANTAGED HYDRANTS)
4. HYDROSTATIC TEST PRESSURE: 1700kPa
5. BOOST PRESSURE: 880kPa
6. FLOW TEST: 20 l/s @ 320kPa (ACHIEVED AT MOST DISADVANTAGED HYDRANT)
7. INSTALLED BY: L & J PLUMBING
8. INSTALLATION DATE: SEPTEMBER 2021
9. TOTAL NUMBER OF HYDRANTS: 2 x DUAL HYDRANTS

Clingcast metals

98 Bath Road
Kirrawee NSW

500m - Radius

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MSDS Chemical Locations

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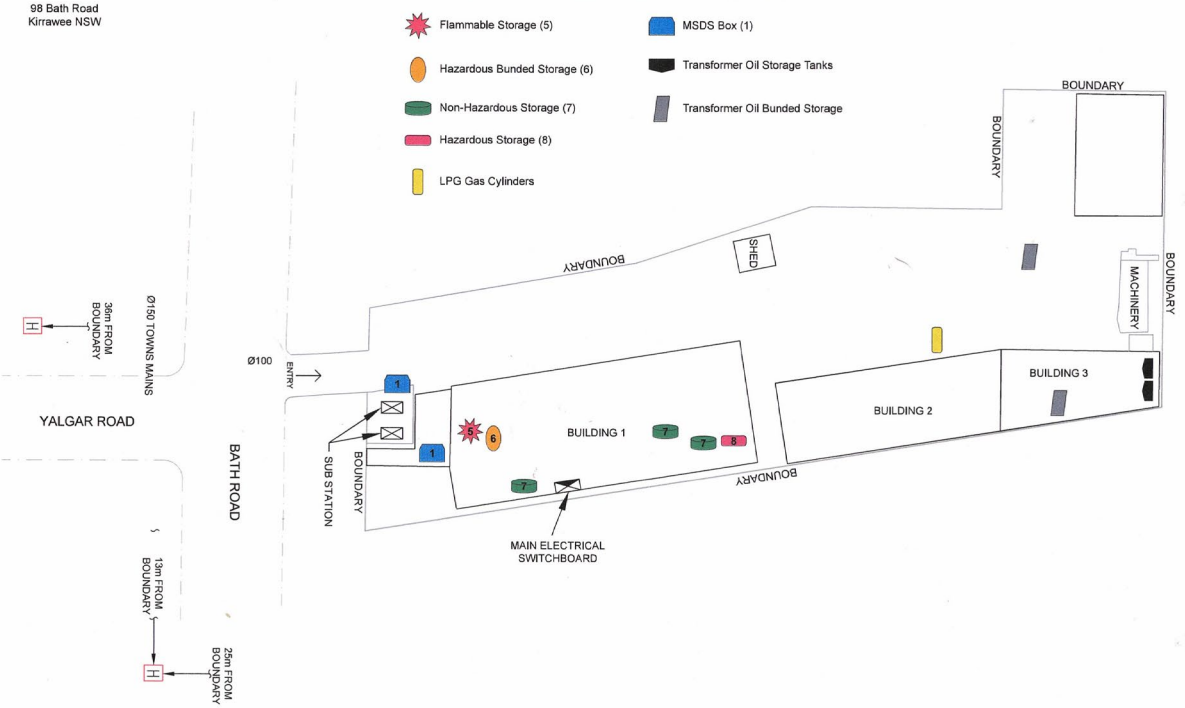
98 Bath Road
Kirrawee NSW



BLOCK PLAN

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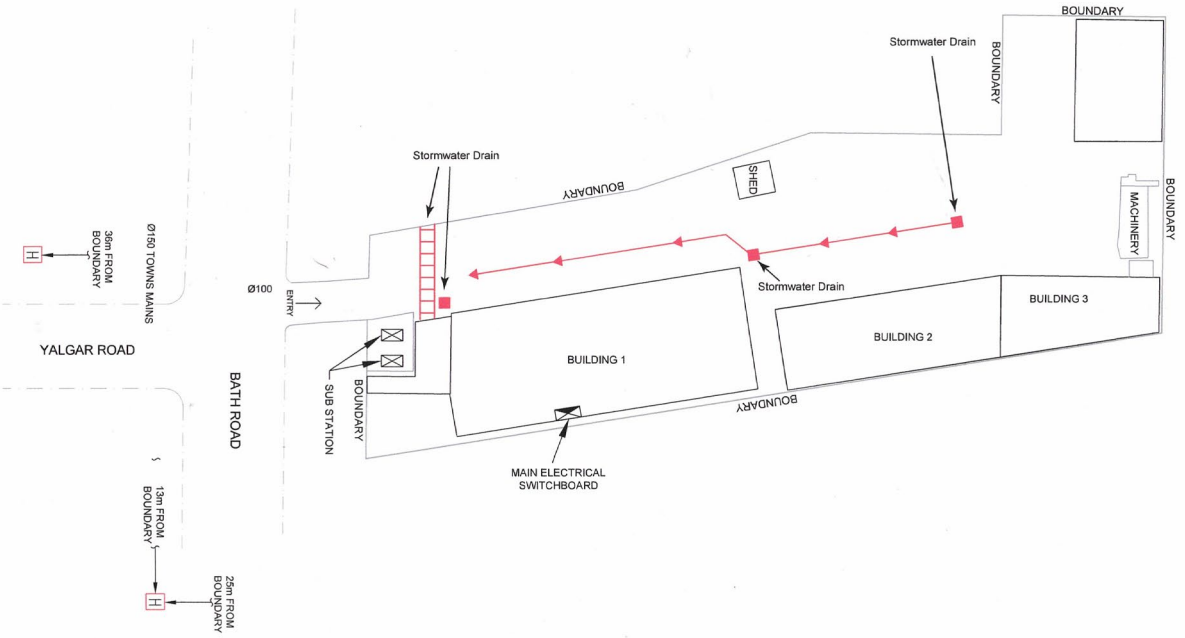
Stormwater Flow, Pipe + Drain Locations

Clingcast metals

98 Bath Road
Kirrawee NSW



Actions to be taken during or immediately after a pollution incident

Emergency Identification • Fire/explosion associated with stored flammable/combustible liquids or flammable gases • Fire from the Furnace • Oil Spill • On-site accident during heavy machinery operation or maintenance resulting in serious injury to personnel • Natural events - flooding, severe storms, earthquake, bush fire • Bomb or substance threat • Vehicle crash on-site or off- site • Medical emergency

Emergency Response • The following sections describe the general procedures for response to emergency situations If an Emergency situation arises: • Personnel are to prepare for evacuation (shutdown plant and equipment if safe to do so) and await further instruction. • The Chief Wardens (or Deputy Chief Warden Timothy Dillon delegate in Chief Warden's absence) will determine and appropriate action in line with nature of emergency. • In an emergency event that requires evacuation, Area Wardens will commence immediate evacuation and direct personnel and visitors to the Emergency Assembly Point. If safe to do so the Area Warden will check the areas for which they are responsible have been evacuated and report the results of the check to the Chief Warden (or Deputy Chief Warden/nominated delegate in Chief Warden's absence). All attempts to respond to an emergency situation should at all times ensure personal safety and only be attempted if within the capabilities of the individual (e.g. using a fire-extinguisher for first-attack, firefighting only if appropriately trained).

Emergency Response Team Members

The following staff members are authorized to declare an emergency or an evacuation: -

Simon Clingan	0418 771 121	General Manager (24hrs) Chief Fire Warden
Scott Swindale	0417 600 901	Foundry Manager (24hrs) Chief Fire Warden
Timothy Dillon	0416 248 247	Fire Warden – RFS Trained Deputy Fire Warden
Megan Miller	0408 999 899	Office Management & WHSO (24hrs) Deputy Fire Warden

Regulatory Emergency Contacts

For all emergencies services call 000

OR call the below numbers for Police, Ambulance and Fire & Rescue.

Sutherland Fire Station	9542-0899
Sutherland Hospital	9540-7111
Sutherland Police	9542-0899
Sutherland Shire Council	9710-0333
EPA	131 555
Work-Safe NSW	131-050

Direct Neighbour Contact Information

Alexander Perrie & Co	9542-3711	90-96 Bath Rd
Home Specialty Coffee	0408 999 565	U1/100 Bath Rd
Matt Keene Electrical	9521 2869	U2/100 Bath Rd
Complete Façade Solutions	9521 3311	U3/100 Bath Rd
Spano Rail Maintenance	8522 3000	U4/100 Bath Rd
A.J. Grant IT	8502 3691	389 Boulevard Rd

Coordinating with persons

On-Site Communication with on-site personnel in the event of an emergency will be via: • Mega Phone &/or Mobile phones. In the event of an emergency requiring evacuation, the emergency evacuation siren will be switched on. The Chief Warden (or Deputy Chief Warden/nominated delegate in Chief Warden's absence) is responsible for the control and coordination of an emergency event. The Emergency Control Point is nominally the Administration Office provided, however, should this location not be safe to occupy the front Carpark Emergency Assembly Point is the on-site alternative. In an emergency event requiring a full site evacuation, the Emergency Assembly Point will be the safe off-site location Wardens (or Deputy Area Wardens/nominated delegate in Area Warden's absence) will be responsible for directing Clingcast personnel and visitors within their nominated area as appropriate for the given emergency and as directed by the Chief Warden (or nominated delegate). This may involve directing Clingcast personnel and visitors to: • remain in the current area • evacuate to a safe location on-site • evacuated to the Emergency Assembly Point or an alternate safe assembly point off-site if it is not safe to access the Emergency Assembly Point Access to the site may need to be restricted in some emergency situations.

Emergency Evacuation Procedure The types of emergencies that could lead to an evacuation are: • On site fire/explosion. • A significant spill of flammable or combustible liquid resulting in fumes and elevated risk of fire and/or explosion. • Natural disasters including bush fires and floods. • An emergency at a neighbouring facility (e.g. fire, bomb threat, substance threat). • A serious on-site or off-site traffic incident. If an emergency situation requiring site evacuation arises:

1. Alarm is to be raised by either the first responder or Chief Fire Warden: an emergency evacuation siren emergency evacuation has been initiated.
2. The first responder or Chief Fire Warden will call 000 as soon as it is safe to do so and request the appropriate emergency services.
3. Commence Evacuation of site: a. Shutdown equipment if safe to do so. b. DO NOT go to lunch rooms/locker rooms to collect personal belongings. c. Follow instructions given by Area Warden.
4. Follow the designated route (or alternate route as directed by the Area Warden should the designated route not be safe to access) from your work area to the emergency assembly point (or alternate location as directed by the Area Warden) if directed by the warden and escort any contractors or visitors as required.
5. If safe to do so, Area Wardens are to confirm that the area they are responsible for has been completely evacuated.
6. A roll call will be undertaken at the Emergency Assembly Point by Area Wardens to account for all personnel and visitors. Notify the Area Warden or other emergency response team members if you believe that an employee or visitor may be unaccounted for.

7. Area Wardens are to report to the Chief Warden regarding the status of the evacuation for their area of responsibility as follows: a. Hazards and unsafe conditions in the evacuated area. b. Whether the area was able to be checked for complete evacuation. c. If there are any employees or visitors unaccounted for

Staff training

Wardens will receive appropriate training to develop the skills and knowledge necessary to undertaken their duties. The training shall include: their duties/responsibilities (pre-emergency, during emergency and post-emergency).

• Procedures for identified potential emergency events.

• Responding to alarms and reports of emergency events.

• Reporting emergencies and initiating emergency warning equipment.

• Communication during emergencies.

• Occupants and visitors with disabilities. • Human behaviour during emergencies.

• The use of emergency response and communication equipment.

• Pollution Incident Response Management Plan – for Clingcast Metals with the range of monitoring, alert and warning systems/resources detailed

• The alert/threat levels detailed

• The response actions and triggers for each of the alert/threat levels detailed above.

• Decision making, command and control.

• Liaison with emergency services.

• Emergency response coordination including coordination of evacuation activities.

• Implementation of post-emergency activities.

• Record keeping. Occupants and Visitors, the site induction (employee induction and visitor induction) includes training in relevant aspects in an emergency event, emergency communication procedures and evacuation procedures.

All full-time employees are to be trained in first-attack firefighting.

• Preparing for site-specific fires

• Reporting fires.

• Evacuating from endangered areas.

• Identifying, correcting and reporting unsafe conditions (combustible materials located too close to flammable liquid storage).

• Identifying the classes of fire (solid, liquid, gas) and selecting the correct first-attack firefighting equipment for each class of fire.

• Safe operating procedures for first-attack firefighting equipment.

• Procedures to be followed after the first-attack firefighting equipment.

• First Aid A minimum of two employees are to be trained in occupational first aid by a nationally accredited registered training organisation.

• A review of roles and responsibilities, including instruction in emergency communication equipment. All employees must participate in a skills retention activity every 12 months. The employee skills retention activities will address:

• responding to alarms and reporting emergencies,

• procedures for specific emergencies, and

• will have first-attack firefighting training & shall attend a skills retention activity every 2 years.

Ongoing Program Emergency response exercises will be undertaken on a minimum 12 monthly basis. The emergency response exercises will involve the simulation of one of the identified potential emergency events listed above. Chief warden will act as observer during the emergency response exercise and be prepared with a checklist specific to the planned emergency event to be simulated. The checklist will provide the basis for discussion of emergency response performance at a post-exercise debriefing. The Chief Fire Warden and other key participants shall attend a debriefing session conducted immediately after an emergency response exercise. Any deficiencies identified during the debriefing session will be reported and an implementation of any required procedural changes and/or emergency response equipment and facility upgrades.

Testing and updating of the PIRMP

This is Clingcast Metals first PIRMP. A testing date has been scheduled on Friday 21st January 2022.

PIRMP testing details

Date tested	
Our first PIRMP testing date was on the 4th February, 2022. Our test was completed and all staff and management were briefed before and after the test commenced. A clear understanding of each person's procedure responsibilities are in place.	

PIRMP update details

PIRMP Testing: 2023

A PIRMP testing procedure was conducted on the 10th March 2023. The test was completed with all staff and management understanding the procedure responsibilities.