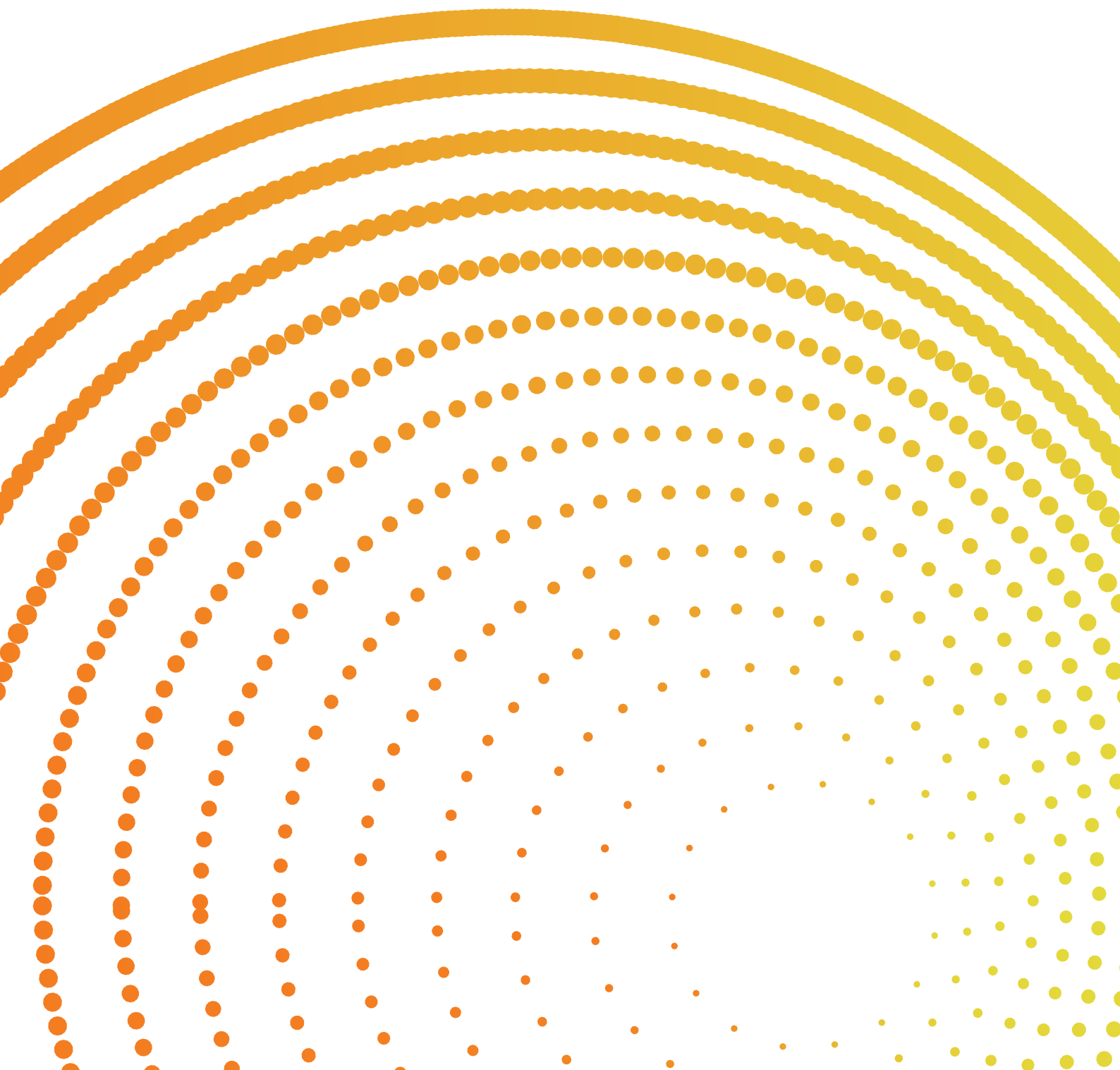

Pollution Incident Response Management Plan



Molycop Legal





Pollution Incident Response Management Plan

The Molycop (ex Donhad) site has a current EPA Licence to manufacture Grinding Media, however the site is currently “mothballed” and has not produced product for several years. Because of the EPA Licence there is a requirement for the site to hold an “Pollution Incident Response Management Plan” (PIRMP). That is this document.

The PIRMP was developed when the site was producing grinding media and since those activities have ceased most of the associated environmental risks have been removed.

The sites key environmental risks are:

- **Liquid Spills:** spills could make their way to the stormwater system unless promptly cleaned up. Use spill kits or other means to control spills. If spills reach the stormwater system there is some settlement capacity however priority must be given to immediate clean-up. Settlement ponds can be sludge-gulped if they have become contaminated. Notify Molycop to organise this.
- **Fire:** Fire extinguishers are available for small fires but contact emergency services as required.
- **Dust:** if dust is leaving the premise boundaries then actions must be taken to prevent this. Stop the activity and implement control actions.
- **Other:** Protection of our environment is the over-riding primary requirement while undertaking any work on the site.

Pollution event notifications:

In the event of a pollution incident (including fire), Molycop may need to notify the EPA. Therefore all environmental pollution incidents need to be notified to Molycop management without delay so that they can make the decision on notification. Notify one of the following managers:

Paul Merrigan	0409 554 166 (Environment Manager)
Jeremy Miller	0421 084 413 (Engineering & Facilities Manager)
Jason Campbell	0454 484 726 (Site Services Manager)

In case of emergency: Dial Infrabuild Emergency 4935 4999

Ask for service you require:	FIRE / POLICE / AMBULANCE
Our Company Name is:	Molycop (ex Donhad site)
Address:	Infrabuild Newcastle Site Access via Ingall Street Entrance MAYFIELD NSW 2304
Closest Cross Street:	George Bishop Drive (within OneSteel Plant)

In event of a power failure, phone (02) 4935 4480 (Infrabuild Power Dept) state what type of emergency:
Fire - Explosion - Gas or Chemical Leak – Medical, state whether any injuries or life involved.

1. Purpose

The purpose of this procedure is to ensure that Molycop Newcastle comply with the requirements of the Protection of the Environment Legislation Amendment Act to prepare and implement an effective pollution incident response management plan. The EPA Licence for the site is held by Commonwealth Steel Company Limited (trading as Molycop Waratah).

2. Scope

This procedure relates only to the Molycop Newcastle site located on the Infrabuild Newcastle site off George Bishop Drive, Mayfield.

3. Responsibilities

Environment Manager

- Development and distribution of Pollution Incident Response Management Plan (PIRMP).
- Periodic review of the relevance and currency of PIRMP.
- Updating of plan in event of any future legislative changes.
- Ensure the PIRMP is uploaded to the company website as required.
- Reporting of pollution incidents to the authorities as required.
- Provision of adequate resources for the implementation of this plan.
- Reporting of pollution incidents to the authorities as required.
- Ensure the necessary controls are in place to manage the potential pollution incident hazards on site.
- Maintenance of the plan to ensure it is kept up to date with relevant contact details (both internal and external).
- Schedule and complete periodic testing of the PIRMP.
- Ensure records are kept of all pollution incidents, training, testing etc. associated with the operation of this plan.

4. Introduction

4.1 Site Description

Table 4-1 describes the subject site. The site is located approximately 6km from Newcastle Harbour.

Table 4-1 Site Details	
Item	Details
Site Name	Molycop (Newcastle)
Site Owner	Molycop
Site Address	Infrabuild Newcastle site off George Bishop Drive, Mayfield
Lot and DP Number	Lot 1 and DP880225
Local Government Authority	Newcastle City Council
Current Zoning	Industrial
Site Area	10 ha
Site Elevation	8 m AHD
Geographical Coordinates	151°44'26.30" E, 32°53'09.17" S

Notes: Elevation is approximate and relative to Australian Height Datum (AHD)

The location of the site in a regional context is shown in Figure 4-1, while that of a local context is shown in Figure 4-2. The local area surrounding the site is clearly seen in the subject site aerial photograph (Figure 4-2).

The Donhad facility is located inside the old BHP site and has no street frontage to any public roads. Access is via the Onesteel access gate at the northern end of Ingall St Mayfield. The site is a hexagonal shape with the factory and offices running along the western boundary with steel storage areas located on the eastern side of the site. Koppers industries are our nearest neighbours to the west of the plant which can be seen in Figure 4-2.

4.2 Neighbouring Land Uses

The site is located in an area zoned as Industry Zone.

The land uses surrounding the site include:

- To the South:** Approximately 350m of vacant industrial land between our southern fence and Industrial drive. Residential land on the opposite side of industrial drive;
- To the West:** 50m to Koppers industries Carbon and tar processing plant and tank farm;
- To the North:** 250m to Infrabuild Bar mill and distribution center;
- To the East:** 250m to Tubemakers Manufacturing plat;
- To the North East:** 140m to Infrabuilds 132KV substation.



Figure 4-1: Regional Context of Proposed Site. / Source: Google Earth.



Figure 4-2: Local Context of Site. / Source: Google Earth.

4.3 Proximity to Local Sensitive Receptors

Potentially sensitive ecological and human receptors for the Molycop (Newcastle) site have been identified as follows:

A. Ecological Receptors:

- The underlying groundwater
- Hunter River approximately 640 metres to the North, and ultimately Newcastle Harbour;
- Kooragang Island and Nature Reserve approximately 2km to the north west;
- The catchment of the area.

B. Human Receptors:

- Adjacent residential areas (350m south west);
- Hunter Christian School (350m south west).

4.4 Site Layout



Figure 4-3: Site layout. / Source: Google Earth.



4.5 Key Activities and Processes

4.1.1 Grinding Media Storage

Grinding media is produced at the Waratah site. No production of grinding media occurs on the ex Donhad site, but the process machinery remains in situ; however, packaging and handling does occasionally occur on site. No waste storage or waste processing occurs on the site.

4.1.2 Ancillary Processes

An oil storage shed is located on the northeastern boundary of the site. The oil storage shed on the northeastern boundary has been emptied. The two water storage tanks have been emptied.

The site has 3 first flush storm water collection tanks which capture the initial rainfall to impact the site as the first volume of rain to enter the stormwater network will contain the highest level of contaminants

4.1.3. Chemical Storage and Handling

The only chemical stored on site in significant volumes is lubricating oil. This is stored in a small bunded area inside the factory building.

Other measures implemented where chemicals are stored and handled include:

- Equipment for the cleanup of reasonably foreseeable spills or leaks of chemicals are kept on site and readily accessible.
- Material Safety Data Sheets (MSDS) for all substances stored and handled on the site are obtained and maintained up to date.
- All personnel responsible for chemical storage and handling activities are trained in the safe storage and handling chemicals.

4.1.4. Chemical Deliveries and Disposals

Forklifts are refuelled using a bulk refuelling service. Bulk fuel spill kits are available on site in case of larger volume spills. The fuel tanker also carries cleanup material in case of a spill.

The septic tank has a pump out system that is by a road tanker when necessary. The system has a high-level alarm to indicate if the levels get too high.

4.1.5. Typical Emissions

Emissions have virtually ceased as no production processes occur.

5. Risk identification

Environmental risks for the site have been identified within the site environmental management system in the environmental aspects and impacts register for the site. (See Molycoop Aspect Register)

5.1 Risk Assessment Process

Environmental risks for the site have been identified in the Environmental Aspects and Impacts register. The procedure for carrying out the risk assessment is described in this document along with the risk assessment criteria used.

(1) How likely is an event to occur?

Consider the number of exposures, and the cumulative failures required to let the event occur.

Likelihood		
Level	Descriptor	Description
5	Almost certain	The event is expected to occur in most circumstances
4	Likely	The event will probably occur in most circumstances
3	Moderate	The event should occur at some time
2	Unlikely	The event could occur at some time
1	Rare	The event may occur only in exceptional circumstances

(2) If it does, what are the worst case scenario consequences?

Perhaps better to work back from 5 to 1. If in doubt, select the higher option.

Consequences or impact		
Level	Descriptor	Example detail description
1	Insignificant	Low financial loss, negligible environmental impact.
2	Minor	On site release immediately contained, minor and reversible impact. Generation of waste. Normal resource consumption. Medium financial loss.
3	Moderate	On site release contained with outside assistance. Potential release to storm water. Incident report to authorities. Minor but reversible. Generation of wastes required disposal as controlled wastes. Significant consumption of resource e.g. gas, water, electricity, chemicals, zinc etc. High financial loss.
4	Major	Loss of production capability. Offsite release contained with outside assistance. Incident reported to authorities, major but reversible impact. Major financial loss.
5	Catastrophic	Toxic release offsite with detrimental effect. Immediate involvement of authorities, major and irreversible impact, huge financial loss.

(3) Use of the information above to find risk level

(i.e. Likelihood "3", Consequence "3", would equal "6" or High Risk)

Level of risk					
Likelihood	Consequences				
	Insignificant	Minor	Moderate	Major	Catastrophic
	1	2	3	4	5
5 (almost certain)	6 - H	7 - H	8 - E	9 - E	10 - E
4 (likely)	5 - M	6 - H	7 - H	8 - E	9 - E
3 (moderate)	4 - M	5 - H	6 - H	7 - E	8 - E
2 (unlikely)	3 - L	4 - L	5 - M	6 - H	7 - E
1 (rare)	2 - L	3 - L	4 - M	5 - H	6 - H

(4) Risk Prioritisation

Risk Score	Risk Level	Suggested Actions
7 - 10	Extreme Risk	Immediate action required to reduce risk
5 - 7	High Risk	Senior management attention needed; reduce as soon as possible
4 - 5	Moderate Risk	Responsibility and action dates must be specified
2 - 4	Low Risk	Manage by routine procedures

5.2 Hazard Identification

The major hazards that could cause potential significant environmental harm because of Molycoop activities are as follows:

Spills during bulk fuel deliveries and oil transfer

No bulk fuel or oil deliveries or bulk refuelling occurs on site anymore. This process is eliminated. Refuelling of any vehicles occurs offsite prior to accessing the site. Forklifts are in minimal use and are refuelled using a jerry can.

The site has a first flush system that will capture run off from all the sealed areas of the site. These first flush tanks will intercept solids and oil before they leave the site.

Spill response kits are in the maintenance workshop, and around the quench water pit.

MSDS's are available in electronic format on the plant information system and in hard copy in the maintenance foreman's office.

Transformer Fire

Three transformers are in purpose-built transformer compounds on the western side of the plant. Each transformer is contained in its own bund with fire walls separating it from the surrounding plant and equipment. A transformer fire would require external firefighting resources. Smoke from a transformer fire may affect Koppers or residents to the south of the plant depending on wind conditions.



5.3 Emergency Response Equipment

The site maintains emergency evacuation plans and the following response equipment:

- Fire extinguishers
- Fire hoses
- Emergency shower
- First aid kit
- Oil spill kits
- Oxy viva
- Defibrillator

5.4 Dangerous Goods

Oil storage shed: Oil storage shed is empty.

Oil recycling area: The oil recycling area is empty.

Incident response procedure

5.5 Definition of a pollution incident

The definition of a pollution is:

An incident or set of circumstances during or as a consequence of a leak, spill, or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring, or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

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

- (a) Harm to the environment is material if:
- (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate, or make good harm to the environment.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

5.6 Notification Procedure – Authorities

If an environmental incident occurs that has the potential to cause material harm as defined above in section 5.5 (b), the supervisor should contact the Molycop Environment Manager (paul.merrigan@molycop.com Ph 0409 554166) to make contact with the appropriate authorities as described in the emergency and evacuation plan.



5.7 Notification Procedure – Neighbours

Notification of residents would be done by Molycop management under advice from fire and health department experts.

The key method of contact would be broadcasts on local radio.

ABC Newcastle	4922 1200
2HD	4967 6111
New FM	4968 0105
KOFM	4942 1433
NXFM	4942 3333

Other key contact details are listed in the site emergency and evacuation plan.

Additional contacts are as follows:

Neighbour	Phone No
Sandvik	4924 2100 / 4924 2150
BHPB	4940 6215
Infrabuild	4935 4951
Hunter Christian School	4967 2111
SCE/Steelstone	4949 2800
Koppers Carbon Materials & Chemicals	4967 7300
Australian Tube Mills	4935 4498

5.8 Immediate Incident Response Procedure (NCL Emergency Evac Procedure)

IN CASE OF EMERGENCY: DIAL INFRABUILD EMERGENCY 4935 4999

Ask for service you require: FIRE / POLICE / AMBULANCE

Our Company Name is: Molycop (ex Donhad site)

Address: Infrabuild Newcastle Site
Access via Ingall Street Entrance
MAYFIELD NSW 2304

Closest Cross Street: George Bishop Drive (within OneSteel Plant)

In event of a power failure, phone (02) 4935 4480 (Infrabuild Power Dept) What type of emergency: Fire - Explosion - Gas or Chemical Leak – Medical, State whether any injuries or life involved.

**Other emergency numbers:****Fire, Ambulance, Police**

Contact Infrabuild Emergency 4935 4999 (see top of page)

OneSteel

Chief Fire Officer (Mon - Fri) 4935 4480

Telephone Exchange (direct) 4935 4900

Ingall St. Gate Security Office 4935 4484

Medical Attention

1. Calvary Mater Newcastle 4921 1211
Edith St., Waratah

2. John Hunter Hospital 4921 3000
Lookout Rd, New Lambton Hts

Koppers Shift Foreman 4968 7300

Austube Mills (Tubemakers) 4935 4498

Molycop Environment Manager 0409 554 166

Molycop Engineering
& Facilities Manager 0421 084 413

Environmental Incidents

Molycop Environment Manager to contact the following agencies in case of potential significant environmental harm:

Newcastle City Council 4974 1399

EPA 131 555

Hunter and New England Health 4924 6477

WorkCover 131 050

Fire and Rescue NSW 1300 729579 (environmental reporting only)

Emergency Evacuation Assembly Area:	Main Entrance (alternative muster point – Nth East Gate)
Telephone Call to Emergency Services:	To be made by the site supervisor or Molycop Environment Manager or in their absence by anyone able to.
After emergency services have been advised, please contact Molycop Management	Paul Merrigan, Head of Safety & Environment (Ph 0409 554 166)

Emergency procedure

Fire:	<ol style="list-style-type: none"> 1. Alert person nearby & raise the alarm. 2. Notify the Area Safety Warden and reception. 3. If safe to do so, contain fire by shutting off gas, isolating power to equipment and closing doors. 4. If safe to do so, extinguish fire using appropriate equipment. 5. Follow Area Safety Warden's instructions to evacuate to designated area if required. 6. If smoke could affect people off site, notify Molycop Environmental Manager who will contact the appropriate authorities.
Explosion:	<ol style="list-style-type: none"> 1. Raise the alarm 2. Notify the site supervisor and Molycop Environmental Manager. 3. If you are able to isolate the source of the explosion do so. This may be achieved by shutting off gas or isolating the power. 4. Isolate other ignition sources in the area and do not create naked flames as there may be gas leaks. 5. If safe to do so, extinguish fire using appropriate equipment. 6. Evacuate to designated area if required.
Environmental incident:	<ol style="list-style-type: none"> 1. Raise the alarm 2. Contain leak if possible. 3. Stop spilt material from leaving the site. 4. Notify Molycop Environmental Manager immediately if the spill could cause material harm to the environment. They will notify the appropriate authorities.
Hazardous Materials Spillage:	<ol style="list-style-type: none"> 1. Raise the alarm. 2. Notify the site supervisor and Molycop environment manager. 3. Isolate ignition sources in the area. 4. Ensure all nearby personnel are moved to an upwind position. 5. Evacuate to designated area if required.
Procedure In the Event of Evacuation:	<ol style="list-style-type: none"> 1. Employees to stop machinery immediately and move to muster point. If primary muster point is unable to be reached, move to alternative muster point.
Medical Emergencies:	<p>Where an individual requires medical evacuation:</p> <ol style="list-style-type: none"> 1. Call emergency services (via Onesteel Emergency) stating the nature and location of the emergency. 2. Call Molycop Safety Manager to attend emergency Paul Merrigan (Ph 0409 554 166) <p>Note: If person is unconscious, when contacting Next of Kin, try to establish if the person is under-taking medical treatment or taking prescription drugs.</p>
Media Release:	No person other than the Molycop General Manager or his designate is to release any information to the Media regarding emergency.

6. Training and testing

6.1 Training Requirements – AT

Persons on the site must be made aware of this PIRMP.

6.2 Plan Testing, Review, and Maintenance

This plan and potential environmental issues arising at the site will be reviewed annually and outcomes entered in the Donesafe system.

This PIRMP will be reviewed on an annual basis or following a significant pollution incident.

7. Approval and history

Detailed record of reviews			
Issue	Amended paragraphs/ pages	Amendment Details	Date Issued
Draft	Draft for review	Removed aspects and impacts register	Aug 2012
Rev 0	Issue for use		
Rev 1	6.4	Updated contact numbers	Mar 2013
Rev 2	6.4	Updated job descriptions Updated Emergency Evacuation Procedure	Nov 2013
Rev 3		General review	Feb 2015
Rev 4		Updated Emergency plan and position titles	Dec 2016
Rev 5	All	Updated to reflect ceasing of production and removal of hazards, and minimal people on site.	Feb 2020
Rev 6	Contact details	Updated enviro and safety managers mobile numbers	Feb 2021
Rev 7	All	Strike-out legacy sentences and some minor updates. Added front page summary to clarify and enhance quick understanding.	Feb 2022
Rev 8	All	Updated all sections with “2023 update”. Removed Brett Allen from contact list	Jan 2023
Rev 9	All	Removed environmental risks associated with grinding media production as this no longer occurs	Sept 2023
Rev 10	All	Updated contact names, removal of waste storage and or processing, removal of bulk fuel delivery or refuelling	Dec 2024
Rev 11	All	Updated styling to align with current Molycop branding.	Mar 2025

Document Author: Ian Wilson

Reviewed by:

Paul Merrigan
Molycop Environment Manager

Jason Campbell
Site Services Manager



molycop.com

All Rights Reserved 2025

