

UNIVERSAL ANODISERS

TEL: [02] 8788 2000
FAX: [02] 8788 2020
www.universalanodisers.com.au



207 NEWTON ROAD
WETHERILL PARK
NSW 2164 AUSTRALIA

PIRMP

Pollution Incident Response
Management Plan

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 11201

Approved by: Tony Case

Position/Title: Manager

Signature: *T. Case*

Date: 30/07/2020

PURPOSE:

Universal Aluminium Co Pty Ltd trading as Universal Anodisers holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 207 Newton Road, Wetherill Park. 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 kept at the licensed premises and can 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 are also available publicly in the Company Profile of the Universal Anodisers website <https://www.universalanodisers.com.au/universal-anodisers.htm>. 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. 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: (including ABN)	Universal Aluminium Co Pty Ltd 82 000 565 097
EPL number:	11201
Premises name and address:	Universal Anodisers 207 Newton Road, Wetherill Park NSW 2164
Company or business contact details	Name: Tony Case Position or title: Manager Business hours contact number/s: 02 8788 2000 After hours contact number/s: 0417 284 761 Email: tony@universalanodisers.com.au
Website address:	www.universalanodisers.com.au
Scheduled activity/activities on EPL:	Metallurgical Activities
Fee-based activity/activities on EPL:	Metal Coating > 0.00 – 100,000 / T annual capacity to coat metal Metal Waste Generation > 100 / T annual volume of waste generate or stored

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: Tony Case
Position or title: Manager
Business hours contact number/s: 02 8788 2000
After hours contact number/s: 0417 284 761
Email: tony@universalanodisers.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: Tony Case

Position or title: Manager

Business hours contact number/s: 02 8788 2000

After hours contact number/s: 0417 284 761

Email: tony@universalanodisers.com.au

Managing response to pollution incident

Name of person responsible: Tony Case

Position or title: Manager

Business hours contact number/s: 02 8788 2000

After hours contact number/s: 0417 284 761

Email: tony@universalanodisers.com.au

Notification of relevant authorities

Dependant on the nature and severity of an incident or event notification of relevant authorities may be 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.

Emergency Services - Fire & Rescue NSW / Rural Fire Service

Nearest Cross street: **COATES PLACE**

Contact number/s:

000

EPA NSW

Contact number/s:

131 555

NSW Health - Liverpool Hospital (ask for Public Health Officer on duty)

Contact number/s:

(02) 9794 0855

After Hours:

(02) 8738 3000

SafeWork NSW

Contact number/s:

131 050

Notification of relevant authorities, continued

Local authority/s

Fairfield City Council

Contact number/s:

(02) 9725 0222

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

Sydney Water Emergency

Contact number/s:

132 090

Department of Planning Industry and Environment

Contact number/s:

1300 305 695

Roads and Maritime (Service NSW)

Contact number/s:

13 77 88

Notification of neighbours and the local community

As the licenses premises is in an industrial area the site is not in the vicinity of any sensitive premises (e.g. schools, preschools, hospitals, nursing homes).

Dependant on the nature and severity of the incident or event, when required, neighbours are to be notified via a phone call by the Manager or an authorised person.

Neighbours Include:

Don Watson	Contact number/s:	(03) 5367 6655
SUEZ Environmental	Contact number/s:	1300 651 116
DHL Trucks	Contact number/s:	See mobile
Chep Pallets	Contact number/s:	(02) 9757 0111
Reiter Tooling	Contact number/s:	(02) 9604 3364
Australian Transport Group	Contact number/s:	(02) 9609 3963

Contact names and mobiles numbers of neighbours are located in the Emergency Hazchem Manifest. APPENDIX 1

Description and likelihood of hazards

Below is a description of the chemical hazards to human health or the environment associated with the activity to which the licence relates:

Sodium Hydroxide (Caustic)

Hazchem or emergency Action Code;	2R
Corrosive to Metals;	Category 1
Skin Corrosion;	Sub Category 1A
Eye Damage;	Category 1

Sulphuric Acid 98%

Hazchem or emergency Action Code;	2P
Corrosive to Metals;	Category 1
Skin Corrosion;	Sub Category 1A
Eye Damage;	Category 1
Specific Target Organ Toxicity;	Category 3

A full copy of all SDS are located in the Emergency Hazchem Manifest: APPENDIX 8

Likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

Unlikely spill caused from transfer of chemicals from tanker to site storage causing chemical release. Blind pit would capture spillage

Unlikely forklift piecing chemical storage such as IBC causing chemical release. Areas where IBC are located are bunded to capture spillage.

Unlikely structural failure of processing tanks causing chemical or waste water release. All processing tanks are in bunded areas to capture spillage.

Pre-emptive actions to be taken

Details of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

Site is purposely build with bunded areas surround factory, water treatment and for the internal acid and alkaline areas.

Ensure regular maintenance of plant and equipment including tanks and chemical storage.

Training of staff on high risk areas including around chemicals, cranes and forklifts.

Training of staff in emergency event procedures including emergency evacuation, spill kit use, fire extinguisher use and pit closure.

Staff to wear Personal Protective Equipment

Emergency Equipment inspections to ensure all equipment is fully functioning and accessible.

Safety Data sheets located in all high risk areas accessible to staff and updated regularly. Full SDS is in the Emergency Hazchem Manifest.

Inventory of pollutants

Maximum quantity / inventory of bulk potential pollutants stored on the premises (over 500 litres or kilograms).

Location / Tank	Max. Quantity	Contents
IBC Chemical Storage Area	1,000 litre	Alphisatin
IBC Chemical Storage Area	1,000 litre	Sodium Hydroxide – Caustic 50%
IBC Chemical Storage Area	1,000 litre	Novaseal 1000LF - Bonderite M-ED 1000LF
Bulk Storage – external northern wall	4,000 litre	Sulphuric Acid 98%
IBC Chemical Storage Area	800 litre	Nitric Acid
Water Treatment Area	8,000 litre	Sodium Hydroxide – Caustic 50%
Anodising Area	20,000 litre	Dilute solutions
Main Roller Doors	30 litre	LPG Gas bottle for forklift

A full inventory of all chemicals stored on the premises are included in the Safety Data Sheet Registry located in the Emergency Hazchem Manifest. APPENDIX 8

Safety equipment

Below is the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

Fire Fighting Equipment including; Fire reels, fire extinguishers

Personal Emergency Equipment including; Eye washes, chemical eye wash, emergency showers, PPE incl glasses, face masks, gloves

Spill Kits x 3 - Wheeled bins located in in factory, water treatment and back scrubbers.

Retention Pit

Blind Pits (external) x 2, 1 x internal blind pit with alarm sensor

Oil Separator

PH meters attached to solenoid valves for outgoing water

Bunded areas

A map indicating locations of emergency equipment is located in the Emergency Hazchem Manifest. APPENDIX 3

Communicating with neighbours and the local community

The Manager, Tony Case or his authorised representative will notify neighbours in the vicinity of the premises if a relevant event or incident occurs, in the unlikely event of the identification of a possible harmful impact or where a scheduled activity such as Evacuation Drill is carried out.

Any specific information or queries that the community may have can be directed to the Manager, Tony Case on 02 8788 2000.

Other information including this PIRMP can be located on our website www.universalanodisers.com.au

Minimising harm to persons on the premises

Below are the arrangements for minimising the risk of harm to any persons who are on the premises where the scheduled activity is being carried out:

Staff and Contractor Inductions

Only authorised personnel allowed in anodising and water treatment areas

Compulsory PPE requirements and PPE provided to staff.

Mandatory training including in emergency procedures, chemical use/hazards.

Maps

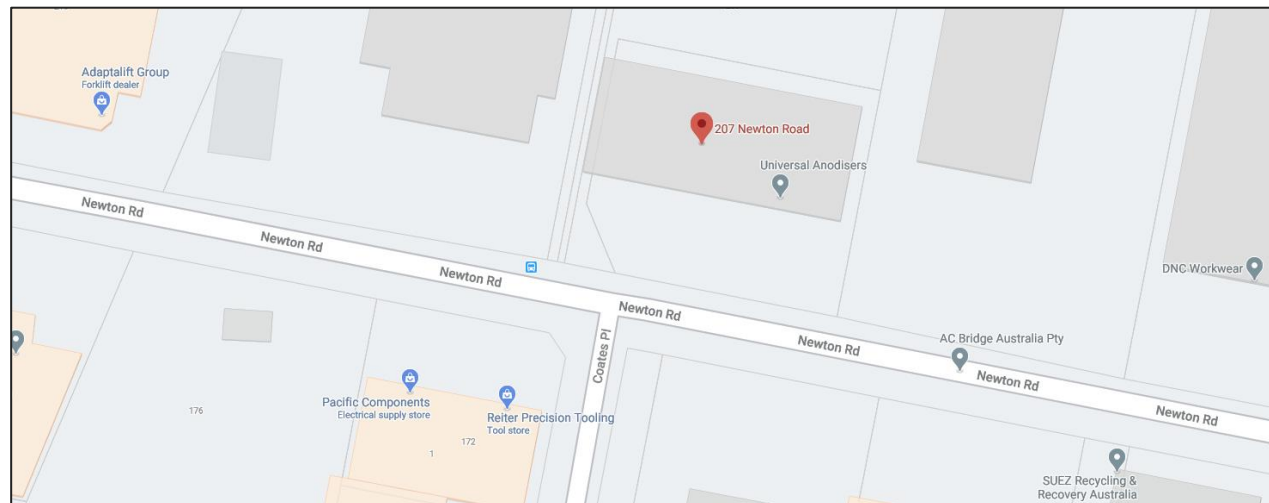
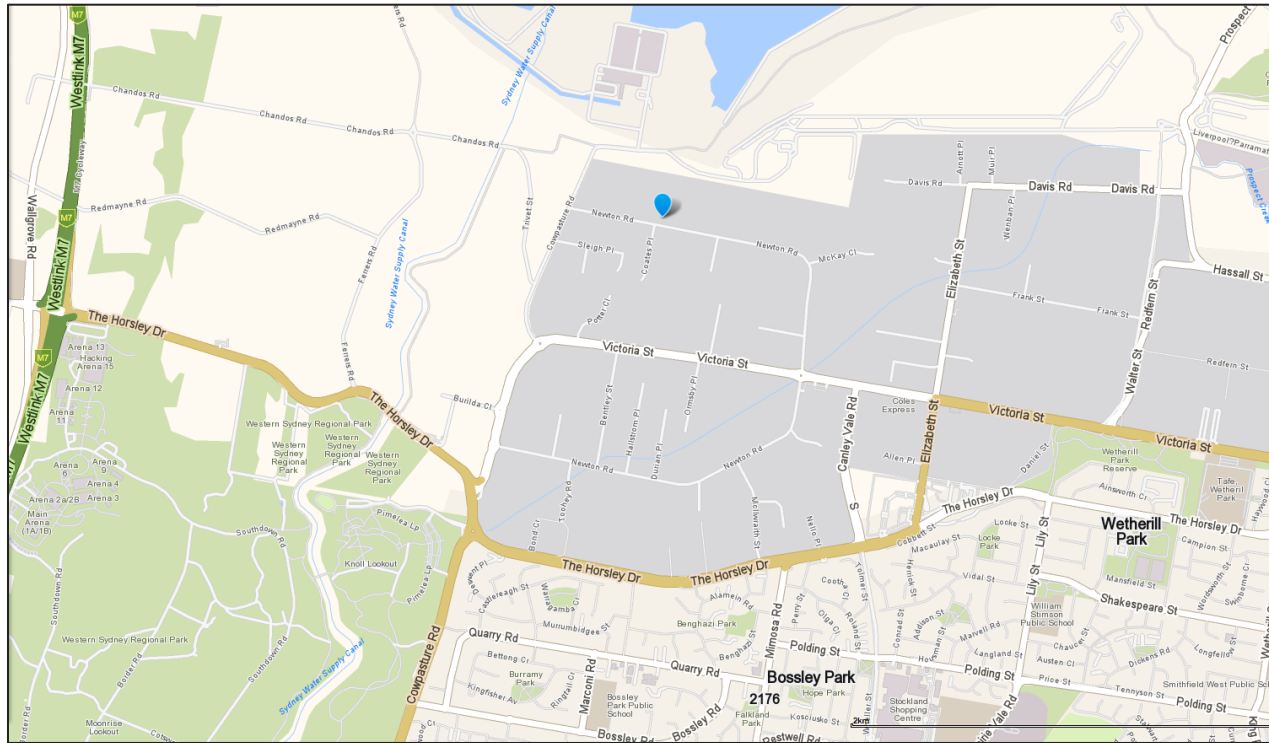
Location of the licenced premises:

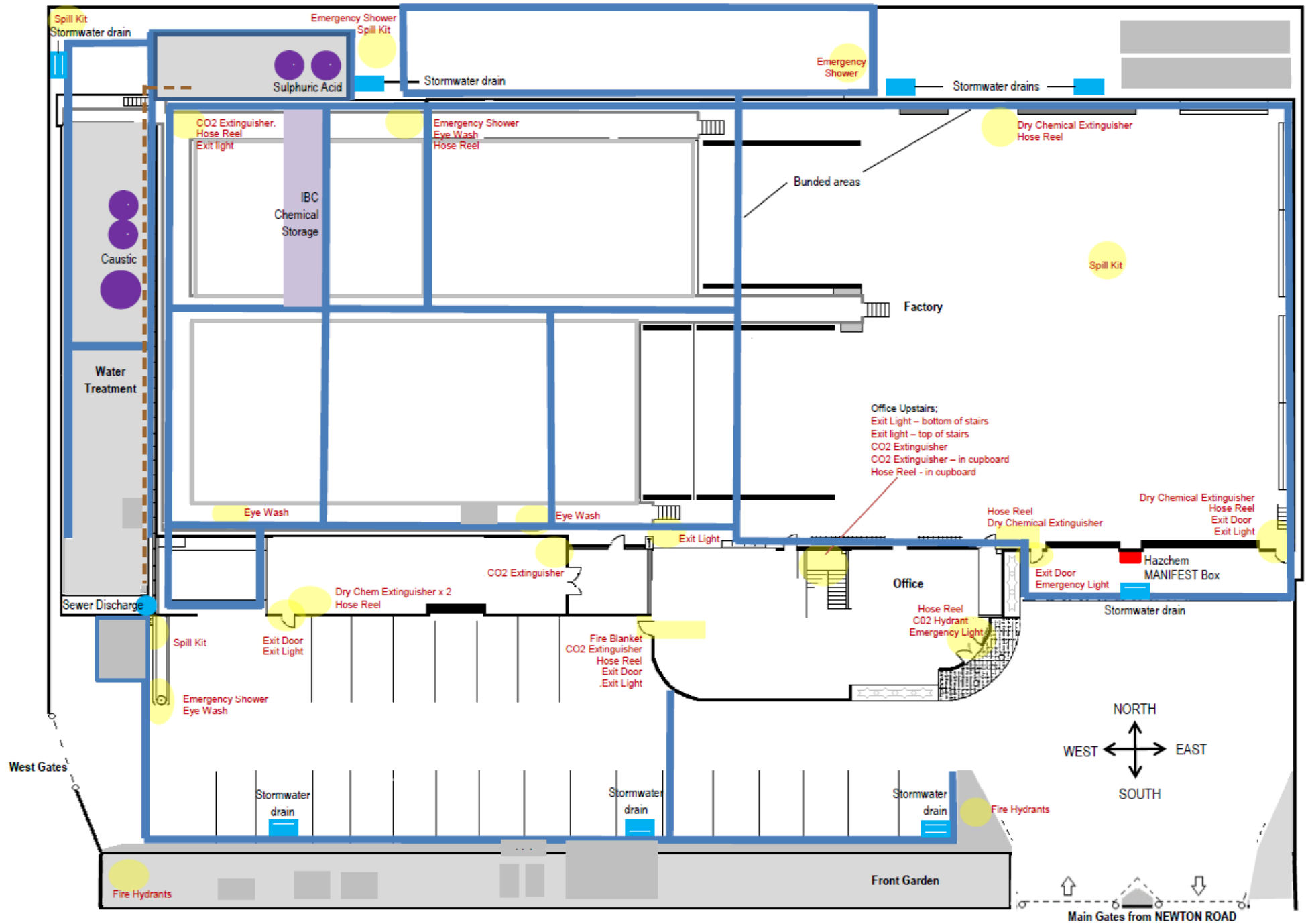
207 Newton Road
Wetherill Park NSW 2164

-33.837865; 150.885852

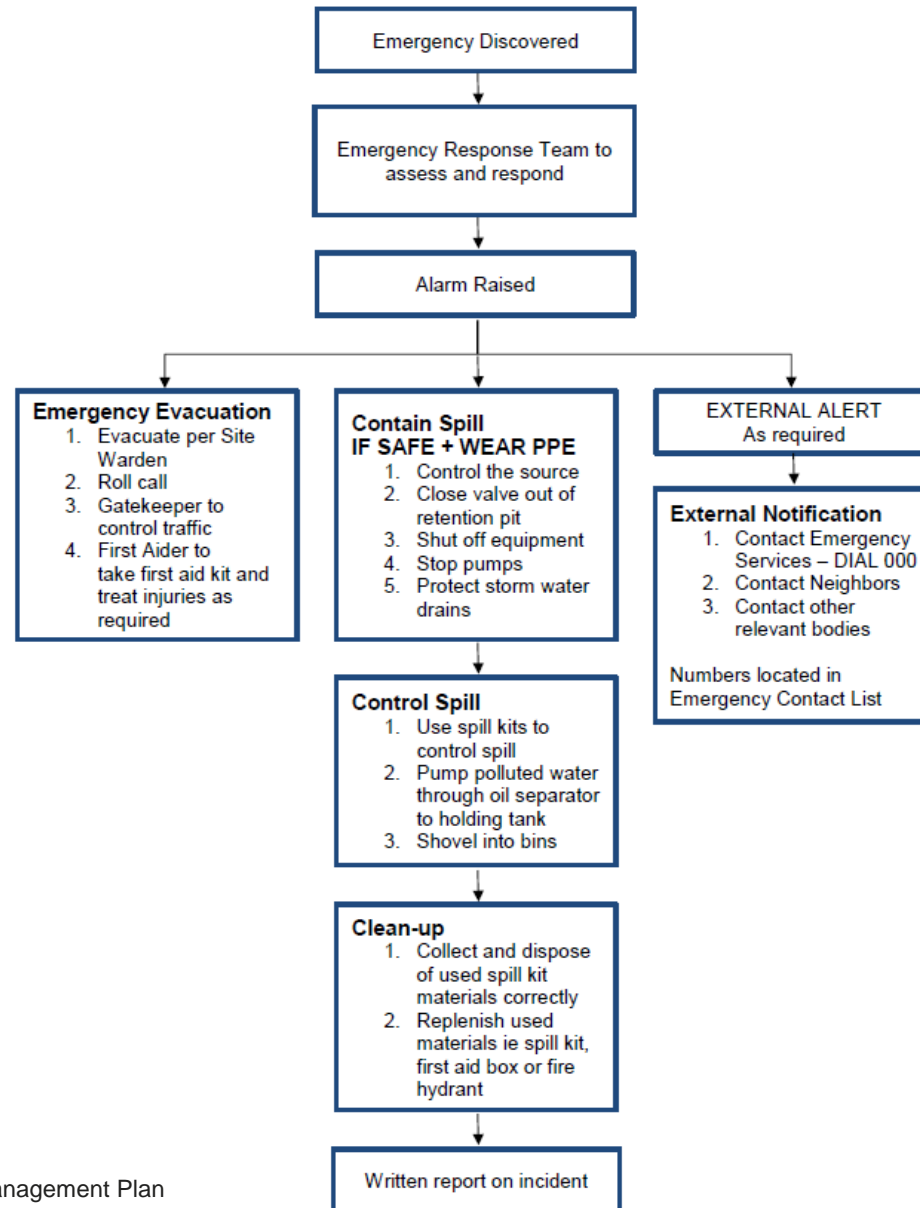
Nearest Cross Road:

Coates Place





SPILL RESPONSE PROCEDURE



Coordinating with persons

Procedures to be followed for coordinating with the authorities or persons who are to be notified:

The Manager or his authorised representative are to phone relevant contacts
Provide the time, date, nature, duration and location of incident
Provide the location of where incident is occurring and/or likely to occur
Estimate quantity/volume and concentrate of pollutant (if relevant or known)
Current action being taken to deal with incident

The person/s through whom all communications are to be made:

Tony Case; Manager.

02 8788 2000 or tony@universalanodisers.com.au

Staff training

Staff training in relation to this plan may include but is not limited to:

Induction
Emergency Evacuation drill
Spill Kit training
Pit closure training
Fire extinguisher training
Chemical + SDS training
Toolbox talks and staff meetings

Emergency Procedures and Trained staff are included in the Emergency Manifest Hazchem. APPENDIX 4-7

Testing and updating of the PIRMP

Details of the plan being tested and maintained are to be recorded below 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:

As per legal requirements, the plan is to be tested every 12 months and within one month of any pollution incident. Testing is to be undertaken either as a desktop review or an emergency drill. A review of the PIRMP will also be undertaken to ensure information is accurate and current.

PIRMP Testing

Date Tested	Tested By	Details of Test	Findings of Test	Next Test Date
6/5/20	L.Da Silva	Emergency Evacuation Drill – all staff	Pre-training for ERT + Wardens done. Change of staff required new staff to be selected, still new at their roles and overlooked to bring Visitors Book out. Retention Pit to have stand-alone training – create procedure with photos and do 1-on-1 training. Need neighbour contact and mobiles as office numbers take too long to get to the right person	May 21
19/8/20	TC, LDS, SH, MH, DV, AH, GG, YA	External Spill training including desktop simulation of spill incident, spill kit products and procedures	Specific reading SDS training on Acid and Caustic to be done. Update Spill Procedure to include correct terminology for products. Purchase disposable chemical suits for catwalk and water treatment as additional PPE	Aug 21

PIRMP Update

Update Date	Tested By	Reason for Update	Details / Changes to PIRMP	Completion Date
6/5/20	L.Da Silva, T.Case + E.Case	Outdated items identified in annual testing	Update contact details (get neighbour mobiles) and pollutant inventory updated. Create new site layout amalgamating current plans, incl stormwater and discharge drains.	30/6/20
10/9/20	T.Case + E.Case	Change-over to use EPA template	Change format of PIRMP to EPA template to ensure all requirements are covered as change of office personnel responsible for PRIMM paperwork.	10/10/20

Appendix

Appendix included in the Emergency Hazchem Manifest located on site:

- Appendix 1: Emergency Contacts
- Appendix 2: Site Location
- Appendix 3: Emergency Equipment Plant Layout
- Appendix 4: Emergency Evacuation Procedure
- Appendix 5: Spill Response Procedure
- Appendix 6: Emergency Spill Kit Procedure
- Appendix 7: Emergency Retention Pit Procedure
- Appendix 8: Register of Hazardous Chemicals
Safety Data Sheets for all chemicals (SDS)