

Tomago Aluminium SPL Processing Facility

Pollution Incident Response Management Plan

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Objectives

The objectives of implementing this Plan are:

- Comprehensive and timely communication about a pollution incident to all recognised stakeholders
- Identification and control of risk of a pollution incident
- Implementation of this plan and verification of its effectiveness.

Background

This Pollution Incident Response Management Plan (PIRMP) has been prepared to achieve the objectives set out above and to demonstrate compliance with the requirements of the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act).

Regain operates an aluminium smelter spent potliner reprocessing plant on the site of the Tomago Aluminium smelter at Tomago Road, Tomago, NSW.

A Pollution Incident is defined under the POEO Act as follows:

'pollution incident' means an incident or set of circumstances during or as a consequence of which there is or is likely to be 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.

Scope

This PIRMP applies to the Regain aluminium smelter spent potlining reprocessing plant on the site of the Tomago Aluminium smelter at Tomago Road, Tomago, NSW.

Other Related Plans

This PIRMP is implemented and operated as part of the Regain Management System (RMS). Other RMS documents and plans that should be read in conjunction with this PIRMP are:

- Regain Environmental Policy
- Environmental Management Plan – Tomago Smelter SPL Reprocessing Facility
- Emergency Response Plan – Tomago Smelter SPL Reprocessing Facility.

Contact Details

Contact details, including names, position titles and 24 hour contact details of key individuals responsible for activating this PIRMP, managing the response are listed in a document, a copy of which is posted on the 'Site Notice Board' -a standard and key information reference point on the Regain site.

The document also lists the contact details for the relevant authorities required under the section 148 of the POEO Act.

Coordination of response and notification of Authorities is coordinated with Tomago Aluminium Company emergency response protocols.

In the event of a pollution incident the Regain operator places a first call to Tomago smelter plant emergency number 9999 who then coordinate local response and urgent contact with Fire and Rescue NSW, the NSW Police and NSW Ambulance Service.

Regain contacts are:

- John Cooper - Operations Manager ph: 0418 341 756
- Kevin Cooper - Development Manager ph: 0417 556 831

Regain Manager to notify authorities in the following order:

1. EPA – Environment Line ph:131 555
2. Ministry of Health via local Public Health Unit – John Hunter Hospital ph: (02) 4924 6477
3. WorkCover – ph: 13 10 50
4. Port Stephens Council – ph: (02) 4980 0255
5. Fire and Rescue NSW – ph: 000

Communicating with Neighbours and Local Community

The Tomago Aluminium plan for communicating with neighbours and local community provides the processes, list of contacts and contact protocols (Tomago Aluminium Company Document PW.EMS.0011 – Notification of Neighbours Regarding Offsite Impact). A Regain manager will work with Tomago Aluminium officers to communicate with neighbours and the local community to inform people about the incident and to provide specific information that can minimise the risk of harm.

Information about any incident is accessible from the Regain website and updated progressively. In the event of a pollution incident, Regain's communications consultant based in Newcastle will prepare media releases providing Regain contact details to respond to any questions from any neighbour, member of the local community and other stakeholders such as employee trade unions and representatives of the media.

Minimising Harm to Persons on the Premises

Regain Emergency Procedures describe actions to be taken during or immediately after a pollution incident. These procedures cover evacuation and muster points. Training in evacuation and muster points is included with induction and refresher training for Regain employees and contractors.

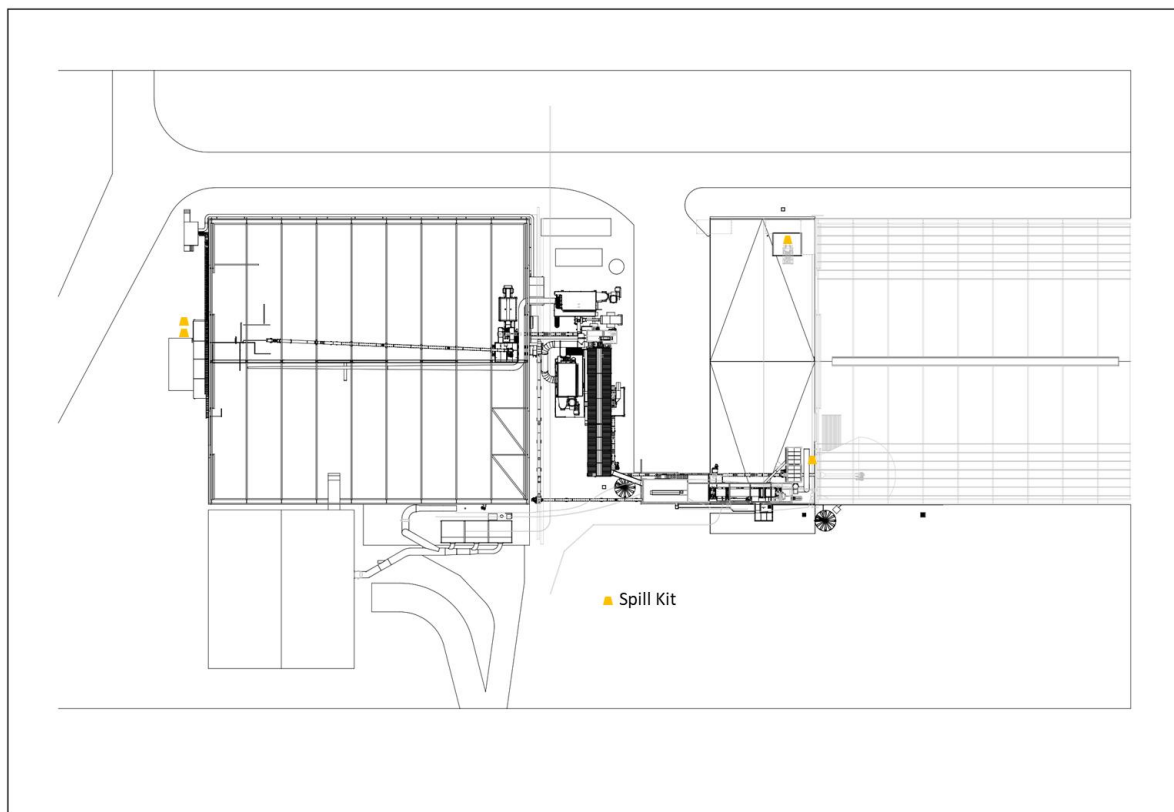
Location of On-Site Information and On-Site Spill Containment Materials

The Regain site office stores on-site information on hazardous materials including safety data sheets and spill containment materials.

There are four spill containment kits located around the Regain site and contain:



- X50 absorbent mats 450m450mm
- X3 20kg bags of guzzler industrial oil absorbent
- X5 1.5m mini booms
- X8 200um contaminated waste bags
- X2 pvc chemical gloves
- X1 safety glasses
- X1 instruction sticker and contents list



The on-site spill kits are located:

- Shed 6 against the Oil Store
- Shed 6 next to southern doorway
- 2 x Shed 5 western side.

Transport spill kits are also located within the trucks transporting SPL and located at site for trucks transporting HiCAL product.

These spill kits contain:

- Torch
- Warning Triangles
- Wheel chocks
- Tarpaulin cover
- Drain cover
- Adsorbent socks
- Polywoven bags

Map

A map of the premises showing the surrounding area and including the location of potential pollutants and storm water drains is kept at the Regain site office. The image below provides an overview of the premises.



Staff Training

A formal training program is in place at the Regain Tomago Site. This program sets the objectives of each training module, the schedule for training each person including frequency, training documentation and record retention.

Environmental and emergency response training for Regain employees and drivers of bulk trucks delivering SPL and/or transporting products includes responsibilities under this PIMRP, the POEO Act and POELA Act. This training and nurturing of general awareness is included in:

- Inductions
- Toolbox meetings
- Formal training courses (including refresher training courses)
- Evacuation, emergency response and pollution incident drills.

Making This Plan Available

A copy of this PIRMP is kept within the Regain Management System documents at the Regain Site office and available for management and authorised officers. A further copy is kept in a folder near the Site Notice Board for ready access by first line employees.

A version of this PIRMP is available online in the Safety and Environment section of the Regain website <http://www.regainmaterials.com/about/regain-operations/tomago/tomago-incident-response-management-plan>. Members of the public may download this version. The web page displays information on how to contact Regain.

Audit and Review

Audit

Audits are conducted for compliance of this Plan with regulatory requirements and overall operational compliance with this PIRMP.

Drills

A pollution incident drill is performed at least annually. The effectiveness of this PIRMP is reviewed after each drill. A written record is prepared of the manner of the drill, the date and the names of the people involved. A pollution incident drill follows within one month of a pollution incident.

Management Review

Management reviews of this PIRMP including its appropriateness and effectiveness are conducted on not less than a three-year cycle.

Document Control

The major updates of this PIRMP are listed in the following table.

Pollution Incident Response Management Plan – Issue History

Revision	Date	Purpose
0	18 Sep 2015	Initial issue
1	18 Jul 2017	Revised & reissued after review and revision of Environmental Management Plan
2	27 Jul 2017	Updated and reissued after updating Regain Manager contact details
2.1	12 April 2018	Updated and re-issued after review of Environmental Management Plan
3.0	14 April 2020	Updated and re-issued to include spill containment controls
3.1	23 Nov 2022	Updated Regain contacts
3.2	19 Jan 2023	Included spill kits in trucks and updated Regain contacts
4.0	27 Mar 2025	Updated following Management Review