MOLYCOP (ex Donhad) NEWCASTLE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

SUMMARY PAGE

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. This document has been edited with strike-out font to redact the redundant sections and updated with the current status prefixed with "2023 update".

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:

Jeffrey Neave – mobile 0409 550 646	(environment manager)
~~Brett Allen – mobile 0438 315 332~~	~~(site manager)~~
Keith Ritchie – mobile 0409 170 085	(manufacturing manager)

IN CASE OF EMERGENCY:	**DIAL INFRABUILDEMERGENCY 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
In event of a power failure, phone	(02) 4935 4480 (Onesteel Power Dept)
Closest Cross Street:	George Bishop Drive (within OneSteel Plant)
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 mAHD

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

4.5. Key Activities and Processes

4.5.1. Grinding Media Production

~~Grinding media is produced by two separate manufacturing processes. Small grinding media from 27mm dia to 105mm dia is produced using roll formers while larger grinding media is produced using an upset forging process.~~

~~6m lengths of steel bar are heated in an introduction coil line and either roll formed or upset forged into a ball. The ball is then quenched using a recirculating water system. Larger balls are then placed into a temper furnace to relieve internal stresses. Balls are placed in drums to cool down.~~

(2023 update: The sites grinding media operations have been suspended. The site is being used for sorting and processing small amounts of scrap metal and 'skulls' at levels far lower than that which would either exceed the sites original Development Consent or would trigger the need for an EPA Licence. Procedures and agreements are im place to ensure this situation remains.

4.5.2. Ancillary Processes

In addition to the two process lines inside the main factory, there are 5 cooling towers used to cool process water and two water storage tanks. These towers and tanks are located on the western side of the factory building.

An oil storage shed is located on the north eastern boundary of the site.

The site has 3 first flush storm water collection tanks which capture all storm water collected on site and where possible this water is collected recycled into the process.

(2023 update: The sites cooling towers have been decommissioned and removed from the Newcastle City Council Register. The oil storage shed on the north eastern boundary has been emptied. The two water storage tanks have been emptied.)

4.5.3. Chemical Storage and Handling

~~The only chemical stored on site in significant volumes is lubricating oil. There is a bundled oil storage shed in the north eastern corner of the site and a smaller bunded area inside the factory building. The upset forging machine has an open lubrication systems and some of the oil reports to the quench water collection sump outside the building on the south western corner of the factory. Oil is collected from this sump using floating oil skimmers. Most of the collected oil is recycled using a shell heated and coalesce to remove water and solids.~~

~~Other measures implemented where chemicals are stored and handled include:~~

- ~~Equipment for the cleanup of reasonable 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.~~

(2023 update: No lubricants are stored in the storage shed. The forge machine remains with its lubricating oil. Any leaks will report to the external water sump which is ultimately

decanted via an automatically starting pump and coalescing plate separator to remove any oils before discharge to the nearby stormwater channel.)

4.5.4. Chemical Deliveries and Disposals

~~Chemical deliveries to the site take place in a couple of different ways. Oils are delivered in 205L drums and placed in the oil store.~~

~~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.~~

~~Waste oil is collected in a bulk tanker as required.~~

~~The septic tank has a pump out system that is collected every week by a road tanker. The system has a high level alarm to indicate if the levels get too high.~~

(2023 update: No chemical deliveries now occur to the site. Refuelling of mobile equipment to occur on hardstand areas with spill kits ready to deploy in case of spill. No bulk waste oil collection is required. The septic tank still operates and is decanted when necessary via a contractor)

4.5.5. Typical Emissions

~~The grinding media production process has very few emissions. Bars are heated in induction coils which have no emissions to air. The major emissions to air are water vapour from the quenching process and the cooling towers.~~

~~Heating of the steel bar creates mill scale which falls off the bar at various points throughout the manufacturing process and is collected for recycling. Scale also reports the quench water collection pit where it settles out and is remove every couple of months. Scale is purchased by scrap steel merchants for recycling and usually leaves the site in open top 205L drums.~~

(2023 update: Emissions have virtually ceased as not 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 Molycop 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 as a result of Molycop activities are as follows:

Spills during bulk fuel deliveries and oil transfer

~~Refuelling of forklifts is done using a mobile fuel tanker. The tanker carry spill response equipment and Donhad have a bulk spills response kit that is suitable to contain larger spills. The bulk spills response kit is located in the oil store. The procedure for control of liquid waste (PRCN 100804) contains instructions on containing and cleaning up spills. All site staff are regularly retrained in this procedure.~~

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

~~Spill response kits are located I the oil storage shed, 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.~~

(2023 update: No fuels or oils stored on site. First flush system remains and will be effective should a spill from a vehicle or other source somehow occur on site. Spill response kits remain in place. In the event of a spill, spill kits are to be deployed and Molycop management are to be notified immediately.)

Transformer Fire

Three transformers are located 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.

Legionella Outbreak

~~The 5 cooling towers are maintained by a water treatment company to ensure that the chemical dosing and testing for legionella is undertaken in accordance with the regulations. Should a significant outbreak of legionella occur, notification of Koppers may be required.~~

(2023 update: Cooling towers have been decommissioned. No risk of legionella remains)

5.3. Emergency Response Equipment

The site maintains emergency evacuation plans and also maintains 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

~~The oil storage shed contains approximately 2000 litre of lubricating oil stored in 205 litre drums and an assortment of specialist oils in 20 litre drums.~~

(2023 update: Oil storage shed is empty)

Oil recycling area

~~The oil recycling area has a 4 off 640 litres oil tanks that are used to store oil during the recycling process.~~

(2023 update: the oil recycling area is empty)

Paint storage cabinet

~~The paint storage cabinet contains approximately 200 litres of paint.~~

(2023 update: The paint storage cabinet 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 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.

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 6.1, the supervisor should contact the Molycop Environment Manager (Jeffrey.neave@molycop.com Ph 0409550646) to make contact with the appropriate authorities as described in the emergency and evacuation plan in section 6.4 below.

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
OneSteel	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 ONESTEEL 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
In event of a power failure, phone	(02) 4935 4480 (Onesteel Power Dept)
Closest Cross Street:	George Bishop Drive (within OneSteel Plant)
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 Onesteel Emergency	4935 4999 (see top of page)

OneSteel

1. Chief Fire Officer (Mon - Fri)	4935 4480
2. Telephone Exchange (direct)	4935 4900
3. Ingall St. Gate Security Office	4935 4484

Medical Attention

1. Calvary Mater Newcastle Edith St., Waratah	4921 1211
2. John Hunter Hospital Lookout Rd, New Lambton Hts	4921 3000
Koppers Shift Foreman	4968 7300
Austube Mills (Tubemakers)	4935 4498
Molycop Environment Manager	0409 550 646
Molycop Safety Manager	0408 645 557

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	Jeffrey Neave , Environment Manager (Ph 0409 550 646)see mobile above Daniel Isaac WHS Manager Ph (Ph 0407 436 257) see mobile above

EMERGENCY PROCEDURES:

Fire:	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:	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:	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:	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:	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:	Where an individual requires medical evacuation: 1. Call emergency services (via Onesteel Emergency) stating the nature and location of the emergency. 2. Call Molycop Safety Manager to attend emergency (Daniel Isaac Ph 0407436257) **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.**
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 and record kept of the same..

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 sites IRMS system.

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

7. APPROVAL AND HISTORY

Issue	Amended paragraphs/ pages	Amendment Details	Date Issued
Draft	Draft for review	Removed aspects and impacts register	August 2012
Rev 0	Issue for use		
Rev 1	6.4	Updated contact numbers	March 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 4.1		Change of title in responsibilities	Jan 2018
Review 5	All	Updated to reflect ceasing of production and removal of hazards, and minimal people on site.	February 2020
Review 6	Contact details	Updated enviro and safety managers mobile numbers	Feb 2021
Review 7	All	Strike-out legacy sentences and some minor updates. Added front page summary to clarify and enhance quick understanding.	Feb 2022
Review 8	All	Updated all sections with “2023 update”. Removed Brett Allen from contact lst	January 2023

Document Author: Ian Wilson

Reviewed by: _____ _____

Jeffrey Neave
Molycop Environment Manager