ELITE PLATING
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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN(PIRMP).

ELITE PLATING PTY LTD – EPL 6356

113 WOODPARK ROAD SMITHFIELD NSW 2164.

Email:enquiries@eliteplating.com.au

Website:www.eliteplating.com.au

Schedule Activities:" Metalurgical Activities"

Business Hours contact: 02 9632 7300

After Hours contact: 0409 928 304

Approved by: Lindsay Harden

Position: General Manager

Date review : 22nd MARCH 2024.

Signed by: L HARDEN.

Copy of this PIRMP is held in Admin Office and Store Office on west side of facility.

IMPLEMENTATION:

This PIRMP is kept as brief as possible containing relevant instruction and information to allow PIRMP to be used by Employees.

The document and its contents is available at all times for reference by staff members.

The PIRMP and other company matters will be discussed at annual review of safety and health meeting of all Employees (as carried out in Aug 2023.)

POLLUTION INCIDENT: PERSONS RESPONSIBLE:

PIRMP – ACTIVATION: - Primary Person - Lindsay Harden

Position: - General Manager.

Phone Business Hours: 02 9632 7300

After Hours : 0409928304

Email:lindsay@eliteplating.com.au

Secondary Person – Andrew Harden

Position: - Foreman.

Phone business hours:02 9632 7300

After hours: 0424 762 058

Email: production@eliteplating.com.au

Notification to Authorities:

Responsible person: Andrew Harden

Position: - Foreman

Phone business hours: 02 9632 7300

After hours: 0424 762 058

Email: production@eliteplating.com.au

Managing Response to pollution incident:

Responsible person: Andrew Harden

Position: - Foreman

Phone business hours: 02 9632 7300

After hours: 0424 762 058

Email: production@eliteplating.com.au

Procedure for notifying authorities:

In the event of an incident that threatens environment, human health or property firstly call:

1) 000 – FIRE RESCUE, POLICE, AMBULANCE DEPT.
   After this call has been lodged then contact:
2) EPA – 131555.
3) WESTMEAD HOSPITAL – 8890 5555.
4) HOLROYD COUNCIL – 9840 9840.
5) SAFEWORK NSW – 131050.

Information to be reported :

-Incident date, time and description of event.

-Exact location within site.

-Nature of pollution, quantity and estimates of volume.

-Your current action to limit spread of risk.

-Give best description at time of incident and update if more exact details are available.

CHECK LIST:

In the case of initiating PIRMP use this CHECK LIST.

	ACTION	COMPLETED TIME am	pm	PERSON RESPONSIBLE		
1						
2						
3						
4						
5						

Update Information to Authorities:

If instructed by either of local authority representative, give feedback via phone or email.

Use this checklist if required. Feedback should be given by Primary Person – Lindsay Harden or Responsible Person – Andrew Harden.

Authority	Contact Name	Contact number/Email	Request	Follow Up/Request

Notification to Neighbours:

Provide a copy of our PIRMP to the nearby neighbouring business by way of email copy, update each neighbour with any changes or updates to PIRMP and Record.

If the nature of incident is likely to affect the nearest neighbouring business then contact be made firstly by phone, alternately by direct contact via their offices.

Advice to neighbours should include:

- Nature of incident.
- Pollutant involved and possible risk if they come in contact.
- Best advice, avoid contact and stay away from the immediate area affected.
- Advise them that authorities have been contacted by you.

Neighbour with possible affected area –	DATE - COPY SENT.
- POWERLINK – 8858 9699 - 113 WOODPARK ROAD.	22.3.2024
- METALTOP RECYCLING 9681 5456 - 109 WOODPARK ROAD.	22.3.2024
- LYSAGHT 9892 4000 - 101 WOODPARK ROAD.	22.3.2024

Description of Hazards:

The hazards associated with our electroplating process are mostly from liquid chemical spills, or from Impact of a building fire on stored chemicals.

- Storm water flooding of site.
- Incorrect storage of different class of chemicals, and subsequent contamination reaction.

Hazards identified are:

- Impact of fire,

- Spill of plating chemicals while unloading the delivery,
- Spill of bulk sulphuric acid while unloading the delivery,
- Rupture of process tanks, physical damage and corrosion,
- Loading waste liquid (spent acid in IBC's).

Likelihood of hazard event occurring:

- Building fire, possible but unlikely, steel frames structure and metal cladding- considered low risk.
- Receiving bulk chemicals i.e. IBC of Acid, has risk when unloading and transfer to store, usually only 1 delivery per month, reduce risk by only allowing an experienced forklift operator to unload and store the IBC in it's designated fixed location.
- Spill from process tanks due to rupture or damage and structure condition - possible risk reduced by the bunding.
- Receiving chemicals in bags such as Caustic Products that may rupture.
- Considered low due to protective packaging and low spread of dry products.
- Receiving liquid chemicals in 25 litre carboys – risks considered low due to the small volume of containers.
- Waste liquid chemicals i.e. spent acid in IBC, possible spill from loading, risk reduced by chemically sound IBC.
- Other considerations from weather events eg. Storm damage to roofing, flooding from downpour.

These are considered low due to the major upgrade of building and site works in the last 24 months.

PRE-EMPTIVE ACTION:

-Updated training of employees with "Managing risks of hazardous chemicals in the workplace" (SafeWork NSW document).

- Updated training in regards to SDS labelling, including Hazard Identification, handling and Storage - Reference to "DUBOIS Site Tool Box briefings - Training Session 2024 Document".
- The plan layout of process area is within a bunded area of approx. 50,000 + litre capacity. The largest process tank is approx. 6000 litres and complete discharge would be contained, within bunded area.
- Storage of spent acid products in IBC 's and limited to 10 units.
- Most chemical components are in 25 litre carboys and stored in process area and Fire Equipment checked on 6 months plan - carry out review of all process tank structures and initiate any repair.
- Carry out inspection and repairs to bunding when required.
- Maintain training of employees with PIRMP.

Inventory of Pollutants:

- A list of proprietary plating chemicals and SDS is held in store office.
- Copy is attached to PIRMP.
- Waste acid product is stored in IBC 's until removed by contractor (usually 6000- 8000 litres).
- Copy of inventory list attached to PIRMP.
- Inventory of process chemicals is shown in process area and fluid treatment area Layout plan (attached at end of CHEMICAL INVENTORY).

SAFETY EQUIPMENT:

- PPE:
- Each employee involved with handling chemicals in workplace is issued with their own P.P.E., including eyewear, gloves, footwear and where necessary face shield.

- In addition to this, protective clothing is available from the Office for any process that may accidentally cause contamination with Employee.
- SPILL KIT:
- We have a spill containment kit that is portable and able to be taken by forklift to any area on premises.
- It includes 3 x 1000 ltrs empty IBC units,
- bulk sand- in 5 x 20 kgs bags.
- Absorbent berm in roll and sheets.
- Saw dust in bags approx. 4 x 20 kg bags.
- absorbent materials in bags.
- PPE including chemical resistant gloves, safety glasses and protective overalls and gum boots.

LOCATION OF SPILL KITS:

- Spill kit items are located in the plating process area on the northern wall.

RESPONSE ACTION- PROCEDURES:

- Firstly consider nature of incident likely to be a pollution event.
- Reduce risk to employees by early warning and advise others if they need to leave the area or assist with containment.

Most events can be contained adequately on site.

Major events to be considered are :

- Building Fire (involving chemicals.)
- Large chemical spill from raw material e.g. Sulphuric Acid, IBC(1000 litres).
- Large liquid spill from process tanks.

Consider if event is beyond our control:

In the event of building fire firstly contact '000' Fire Rescue NSW.

After arrival of first responding crew (FRNSW) provide them with PIRMP information as documented to help them determine nature of incident.

Co-operate with first responding team and provide them with advise on storm water layout particularly underground water run off storage (shown as OSD on site plan).

Then consider if other agencies need to be advised.

In the event of pollution incident occurring the following steps should be taken, to reduce the risk of harm to human health:

- Advise Manager or Supervisor.
- Identify chemical involved.
- Estimate pathway of flow and volume.
- Use PPE and minimize spread by applying sand and absorbent material to area.
- If possible move any damaged container to a bunded area in building, to limit spill volume.
- Use sand or absorbent material to protect drainage system in area of spill.
- Advise all employees of event to be aware of incident.
- If incident is unable to be contained activate notification, by nominated responsible manager.
- Use check list of notifications from 1 to 5 as listed in PIRMP authorities/ neighbours.
- Communication to be made firstly by responsible person on site: Andrew or Lindsay.
- The Responsible Person will update all personell on site of the progress of clean up and identify any risks that remain current and yet to be finalized.

EMERGENCY PLAN- EVACUATION:

This plan has been developed after assessment of major hazard that could lead to the evacuation of the premises.

Possible major event could be but not limited to:

- Building fire at our location or neighbouring buildings.
- Extreme weather conditions leading to building damage. Evacuation should only take place when the hazard is unable to be contained with onsite equipment and personnel.

Consultation with the site Foreman or Manager:

- In the event of evacuation, leave building by the nearest exit door and assemble in carpark area at main gate of premises.

Responsible person/ Foreman to compile checklist of employees at evacuation point to ensure all staff present have gathered at the Emergency meeting place.

STAFF TRAINING:

Elite Plating provides an induction checklist for employees.

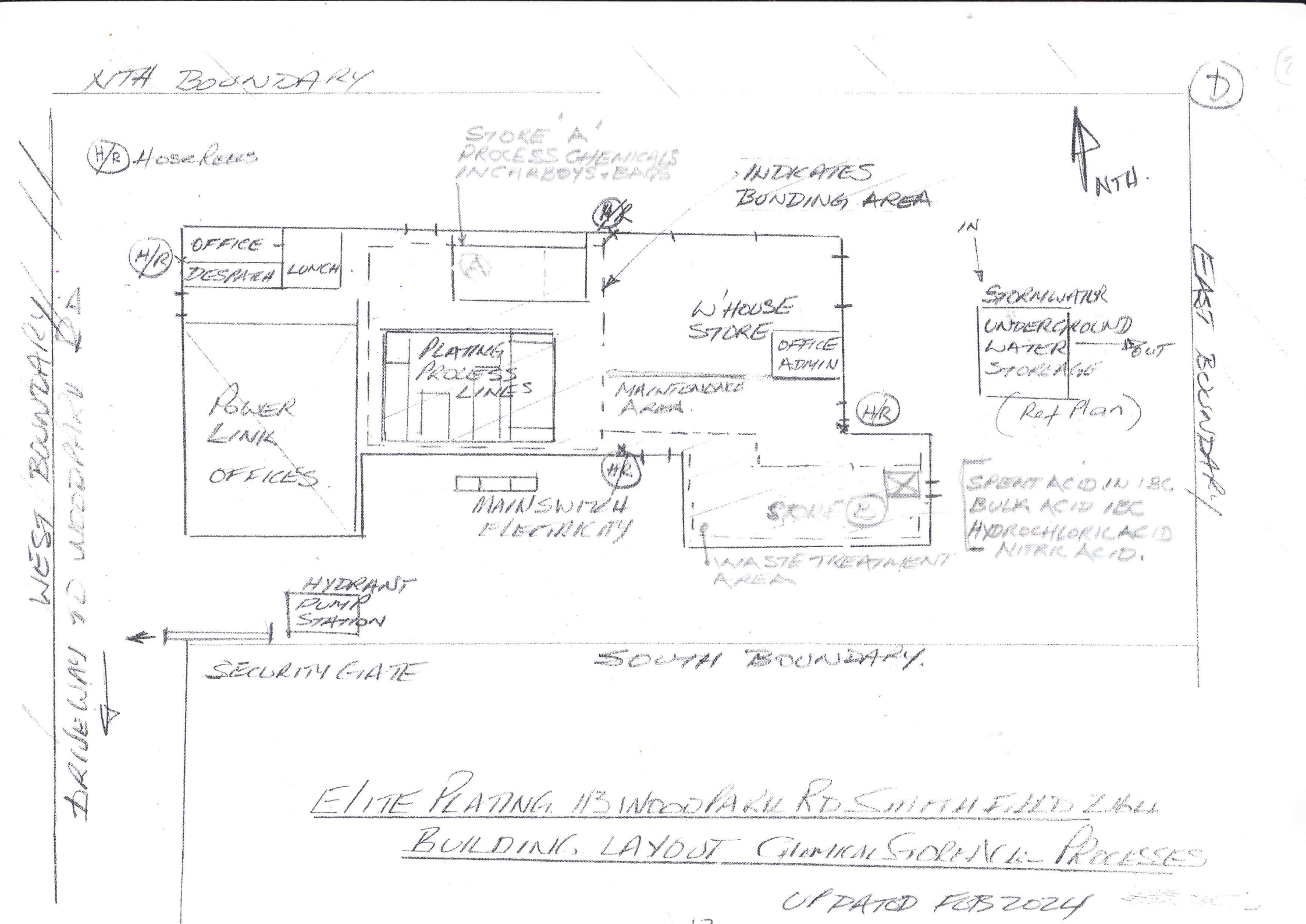
A visitor register is also available with a copy of induction checklist for those contractors carrying on work on site.

Copy of induction checklist is also attached to PIRMP also.

The PIRMP is in a format that employees will be capable of understanding-

- The training objective is to be aware of hazards, and be capable to respond in assisting with hazard minimization and containment.
- At least once per year all staff to be advised of PIRMP document details with required level of understanding to

be gained and recorded in the Employee Induction Checklist Review and Update document.



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BUILDING LAYOUT CHEMICAL STORAGE PROCESSES

UPDATED FEB 2024

Elite Plating - Google Maps