

SAPPHIRE

BESPOKE SOLUTIONS FOR ALUMINIUM



Pollution Incident Response Management Plan

Version History

Version Number Date Description of Amendments Authorisation

1	13/07/2017 Development of PIRMP Production Manager
2	24/04/2025 Update Site Plan
3	17/08/2026 Update Contacts

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1. INTRODUCTION

Sapphire Aluminium's Emergency Response Plan sets out how the company acts in the event of an emergency.

Sapphire Aluminium's premises are classified as unscheduled activity and is regulated by the local council Central Coast Council and as such is not required to post this policy publicly.

It includes how to respond in the event of any incident that occurs on site which may impact offsite. The plan is shared with regulators and emergency services and is updated whenever new information becomes available.

Emergency services include

- Fire and Rescue NSW
- NSW Ambulance Service
- NSW Police

1.1. What kinds of incidents could occur at Sapphire Aluminium that could initiate the emergency response plan?

- Rupture of a bulk storage vessel containing acid or caustic
- Damage to a bulk tanker delivering acid or caustic
- Electrical or vehicle fire
- Natural disasters (earthquake)
- Security threat

1.2. How does Sapphire decide what is an "emergency"?

- Trained personnel on site assess the situation and consider whether the incident is an emergency.

Factors will include:

- Are people present in the area?
- Can their health be affected?
- Is the "incident" contained on site?
- Can environmental damage occur?
- Can the "incident" escalate
- Can neighbours be affected?
- Are emergency services required to control the incident?

Priorities for action include:

- Rescuing people in immediate danger
- Protecting people on and offsite
- Protecting the environment
- Notifying relevant authorities.

2. EMERGENCY RESPONSE

Each emergency situation will be assessed and responded to in a manner which is appropriate for the circumstances of the incident, using the process outlined below.

The Production Manager is responsible for activating this plan in the event of an incident. In the event that an incident occurs, the first step is to undertake a risk assessment of the site to determine if there is a risk to people, property and/or the environment and implement immediate corrective actions to prevent further harm in accordance with the relevant SDS.

The primary control which should be implemented is to isolate the pollution source.

If the source is outside a bunded contained area, then the spill kit must be utilised to contain the spill and once contained the contaminated material should be disposed of at an approved waste management facility.

LOCAL EMERGENCY • Contained to a limited area of the site • Does not impact the rest of the site or offsite Response is managed by trained site personnel Examples: • medical emergency • localized leak • small fire • equipment or structural failure • unstable plant operation	ON SITE EMERGENCY • Potential to affect all site personnel • Will require assistance from all site resources • Does not impact offsite. Examples: • electrical fire inside factory or offices • corrosive liquid leak in factory or loading bay with or without toxic fumes. A siren will sound within the factory to alert personnel and may be followed with an instruction to leave the building for assembly at the designated ASSEMBLY POINT in accordance the established evacuation procedure.
OFF SITE EMERGENCY It is highly unlikely that an offsite incident will become an on-site emergency. However, if a neighbouring property has an emergency. • Potential to affect all site personnel Examples: • fire • Explosion • toxic fumes generated from spill A siren will sound within the factory to alert personnel and may be followed with an instruction to leave the building for assembly at the designated ASSEMBLY POINT in accordance the established evacuation procedure. • Emergency services will be notified	EMERGENCY WITH POTENTIAL OFF SITE IMPACTS In the event of a bulk tanker accidentally discharging acids or caustic solutions in an uncontained area of our site this could run off to storm water drains. • Trained site personnel will try to contain any such spill to the site • Site personnel will also assist emergency services with technical advice or as requested.

3. EMERGENCY CONTACTS

3.1. INTERNAL CONTACTS

CONTACT	POSITION	NUMBER
James Davison	Operations Manager	0451 631 824
Grant Heap	Production Co-ordinator - Finishing	0412 817 308

3.2. EXTERNAL REPORTING

Environmental incidents which require external notification are required to be notified IMMEDIATELY.

Where adequate resources are available to allow for concurrent notification and immediate response to an environmental incident, notification to the relevant Authorities must be given IMMEDIATELY. The decision on whether to notify should not delay immediate actions to ensure the safety of people or contain a pollution incident, however the notification to the relevant Authorities should be made as soon as it is safe to do so.

If the pollution incident presents an immediate threat to human life or property '000' must be called first.

If the incident does not present an immediate threat to human life or property or once '000' has been called, then the other relevant Authorities listed below must be notified **IMMEDIATELY** in the following order:

Pollution Incident Notification Numbers		
	Relevant Authority	Phone number
1	EPA - Environmental Health Line	131 555 (24 Hours)
2	Public Health Unit - Senior Environmental Health Officer	(02) 4320 9370, 0412 014 430 Or 0414 193 976 (business hours) (02) 4320 2111 (after hours)
3	NSW Work Cover Authority	13 10 50 (24 hours)
4	Gosford City Council	(02) 4325 8222 (24 hours)
5	Fire and Rescue NSW	1300 729 579 (24 hours)

When notifying the relevant Authorities, state that you are calling to advise of a pollution incident and provide the following information (if known):

- The time, date, nature, duration and location of the incident.
- The location of the place where pollution is occurring or is likely to occur.
- The nature, the estimated quantity or volume and the concentration of any pollutants involved.
- The circumstances in which the incident occurred (including the cause of the incident, if known).
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.

Site Address is : 19 -29 Pile Road, Somersby NSW 2250

Nearest Cross Street is : Old Pacific Hwy, Somersby NSW 2250

3.3. OTHER CONTACTS

NEIGHBOURING PREMISES

- Borg Manufacturing (02) 4340 9800

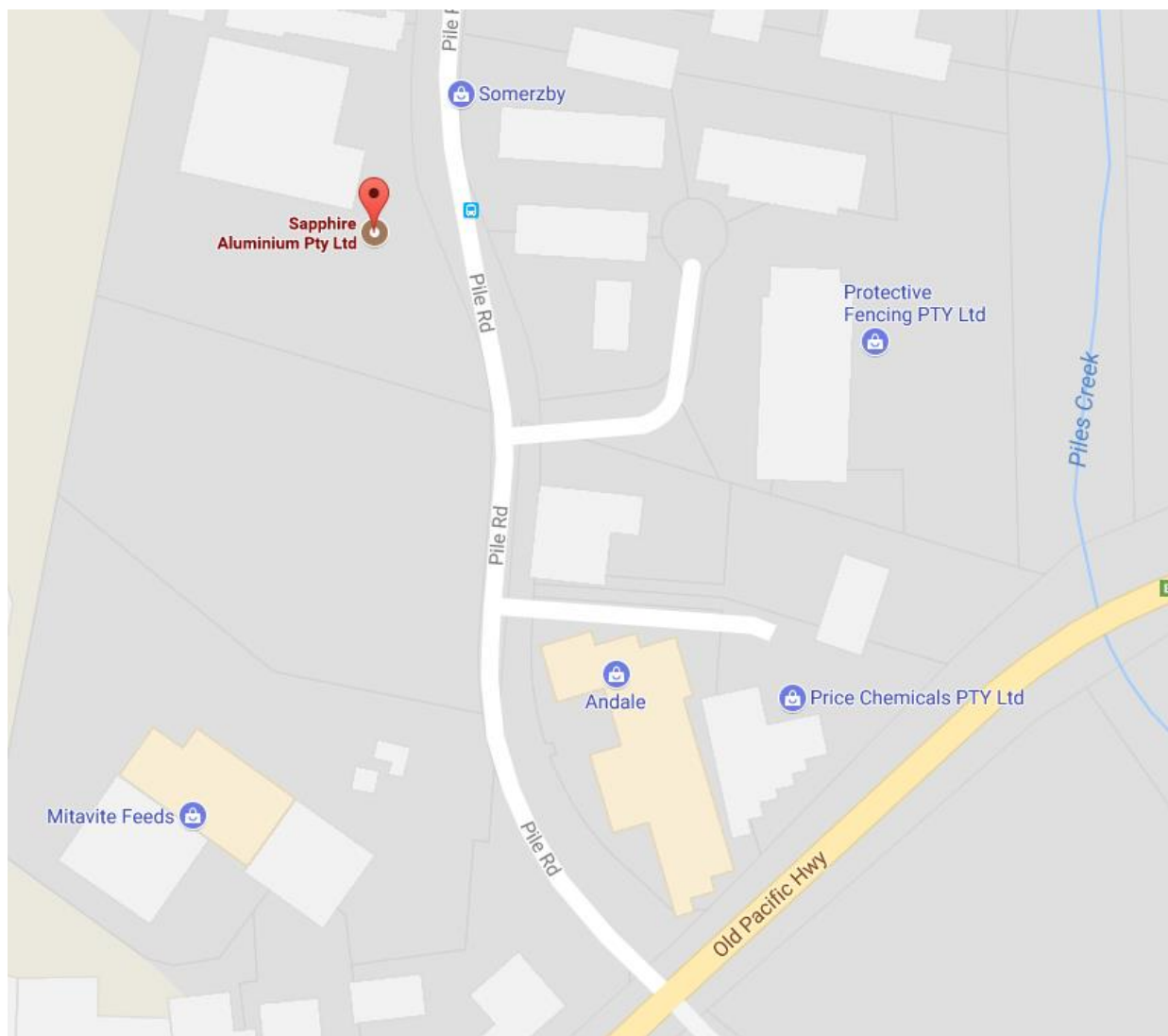
4. LOCATION DETAILS

Sapphire Aluminium Pty Ltd

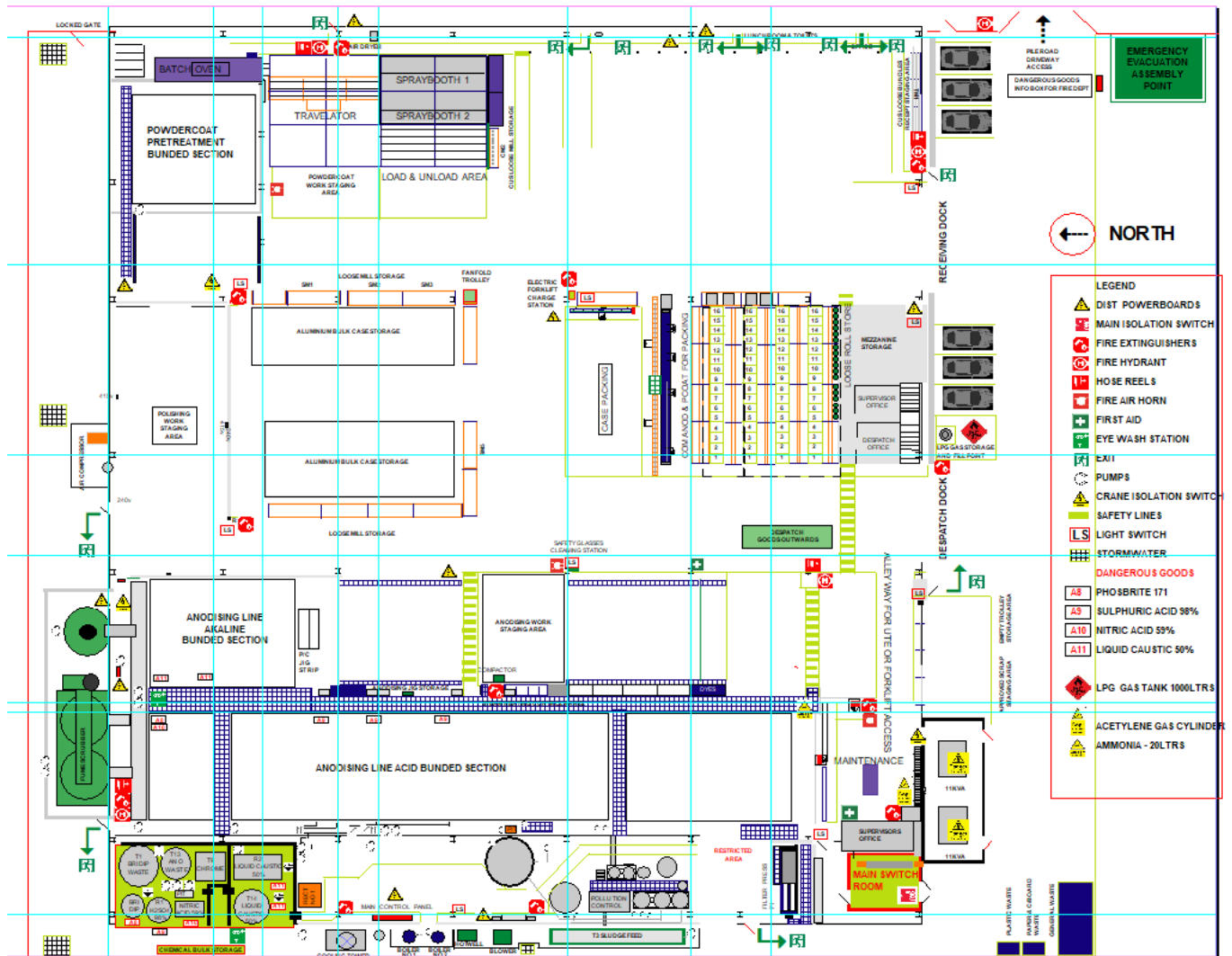
19 – 29 Pile Road, Somersby NSW 2250



Location Map



5. EMERGENCY PLANT LAYOUT



6. SAFETY EQUIPMENT AND INFRASTRUCTURE

6.1. Safety Data Sheets (SDS)

The site maintains relevant SDS's electronically and has hard copies located in the plant outside the Despatch office. These are maintained via an annual audit or as new products are added.

6.2. Safety Equipment Emergency/safety equipment

is available onsite and with Operational staff groups working offsite. The list of equipment and locations will vary depending on the risks and activities onsite. Specific emergency/safety equipment, for the site is listed in site specific plans maintained onsite.

Safe Work Method Statements (SWMS) are stored in hardcopy at the site and electronically in Sapphire's electronic management system.

7. WHAT KIND OF EMERGENCIES COULD OCCUR AT SAPPHIRE ALUMINIUM?

7.1. RISK ASSESSMENT TABLE

The design and construction of this facility followed extensive consultation and consideration of risks associated with its operation as an aluminium finishing plant. It is purpose built incorporating safeguards that are “best practice”. This table has been developed to consider operation of the plant and a range of possible initiating events that may create an emergency.

The possible consequences of events are described and available safeguards and comments are listed. The most significant risk is chemical spillage with a possible release of acid or alkali fumes. Fire with or without explosion is possible but extremely unlikely during normal operation.

An earthquake or terrorist attack could render designed safety systems inoperable, but this is considered to be highly unlikely. The Table is set out on the following three pages.

7.2. FIRE, EXPLOSION AND GAS RELEASES

Possible Initiating Events	Facility of Operation	Possible Consequences	Available Safeguards and Comment
Leakage of natural gas used for gas fired boilers	Processing Tanks	- Gas release, possibly causing asphyxiation. - Flash fire/explosion due to ignition of gas causing damage to equipment and factory building.	- Factory ventilation is provided by a ridge ventilator and roof extraction fans. - Virtual absence of combustible material limits the potential for fire propagation
Leakage of natural gas used for gas fired Powder Oven	Baking Oven	Flash fire/explosion due to possible ignition of gas build up in Oven causing damage to equipment and factory building.	- Gas control systems have inbuilt safety's to avoid buildup of gas. - Oven and control systems are regularly checked and serviced by licenced gas fitter - Virtual absence of combustible material limits the potential for fire propagation
Leakage of LPG bulk bottle	Decanting to gas bottles for Forklift	Flash fire/explosion due to possible ignition of gas leaking from bottle damage to equipment and factory building.	- Only operated by training staff by LPG gas provider - Bulk bottle serviced by LPG provider. - Bottle is placed outside in clear space away from combustibles
Leakage of Acetylene gas bottle	Welding	Flash fire/explosion due to possible ignition of gas leaking from bottle damage to equipment and factory building.	Welding is conducted in dedicated engineering area with appropriate guards and extinguisher located in this location.
Emissions of gases from solutions regularly used in tanks	Anodising Processing Tanks	- Unacceptably high occupational exposures to respiratory irritants by inhalation. - Emissions of flammable hydrogen gas. Flash fire/explosion due to ignition of hydrogen causing damage to equipment and factory building.	- Gases are extracted from process tanks and directly vented to the atmosphere after passage through fume scrubbers. - Fume scrubber has SMS reporting to all internal emergency contacts 24 hours/7 days a week that reports status and any potential fault.
Emissions of corrosive mists from solutions regularly used in tanks	Anodising Processing Tanks	Unacceptably high occupational exposures to respiratory irritants by inhalation.	- Gases are extracted from process tanks and directly vented to the atmosphere after passage through fume scrubbers. - Fume scrubber has SMS reporting to all internal emergency contacts 24 hours/7 days a week that reports status and any potential fault.
Acid pumped from tanker to the sodium hydroxide by mistake.	Bunded Area Inside Factory - Bulk liquid Storage Tank - Storage area	- As well as violent neutralization, reaction with mild steel tank, possibly producing hydrogen, sulphur dioxide with sulphuric acid. - Flash fire/explosion due to ignition of hydrogen in flammable range causing damage	- Filling of bulk liquids is only performed by trained operators with attendance of trained internal operator. - All filling points are clearly marked and locked for safety located inside the factory to prevent unauthorized access. - In the event the mistake was to occur the bulk tank is located inside the factory in its own bunded excluded area with ventilation to the roof above and is free of any combustibles.
Emissions of unscrubbed / inadequately scrubbed fumes from fume scrubbers	Bunded Awning area – - Water Treatment Plant - Scrubbers	Unacceptably high occupational exposures to respiratory irritants inside the factory if plant fails.	- Fume scrubber has SMS reporting to all internal emergency contacts 24 hours/7 days a week that reports status and any potential fault with the plant operation. - Sapphire has a backup scrubber plant in the event of a major failure of main plant.

7.3. CHEMICAL SPILLS

Possible Initiating Events	Facility of Operation	Possible Consequences	Available Safeguards and Comment
Loss of containment of liquid due to tank/valve failure/leak from processing tanks.	Processing Tanks/Pits	Release of chemicals to environment via storm water drainage.	- All tanks are located in bunded areas which have bund capacities exceeding the total capacity of any single tank. - Most solutions are quite dilute and would not pose a significant threat to the environment
Loss of containment of liquid due to pump/valve/tank failure or leak or tank overfilling during transfer of liquids: - Between process tanks - From packages to tanks - From bulk liquid tanks to tanks - Between tanks and water treatment plant.	- Bunded Area - Bulk liquids - Storage area	Release of chemicals to environment via storm water drainage.	- All tanks and regeneration plant are in bunded areas which have bund capacities exceeding the total capacity of any single tank. - All Chemicals are stored in Bunded Areas. - Main Water line to plant is isolated at end of shift. - Water treatment plant is contained within bunded areas and features SMS warning
Loss of containment of bulk liquids due to tank/valve failure/leak or overfilling of tanks, driveway error.	- Delivery Area - Bulk liquids - Storage area	Release of chemicals to environment via storm water drainage.	- All un/loading of bulk chemicals to take place in Bulk Delivery area. Bulk Delivery Area features a spill guard over the adjacent Storm water to prevent spill from entering Storm water in the event of any spill. - Bulk tank bund capacities exceed the total capacity of a single tank - Only experienced tanker drivers - Low delivery rate - Delivered quantity is to be less than the tank capacity making overfilling less likely.
Collision of tanker with structures (building, bulk storage tanks/lines.	- Delivery Area - Bulk liquids - Storage area	- Damage to tanker/valve leading to loss of containment of liquid. - Damage to bulk tanks/lines leading to loss of containment. - Consequences as for loss of containment	- Safeguards as above - Crash guards in place for fixed structures.
Loss of containment of liquids due to a tank/valve /pipe/pump failure or overfill.	- Water Treatment Plant - Fume Scrubbers	Release of chemicals to environment via stormwater drainage.	- Water treatment Plant is located inside the factory and contained in bunded location which exceeds capacity of plant. - Fume scrubber is located in separate bunded area that drains to larger internal bunded area. - Fume Scrubber SMS reporting to all internal emergency contacts 24 hours/7 days a week that reports status and any potential fault or equipment failure. - Scrubber solutions are quite dilute and small volume and would not pose a significant threat to the environment.

Acid pumped from tanker to the sodium hydroxide by mistake.	Bunded Area Inside Factory • Bulk Liquid Storage Tank • Storage area	• As well as violent neutralization, reaction with mild steel tank, possibly producing hydrogen, sulphur dioxide with sulphuric acid. • Flash fire/explosion due to ignition of hydrogen in flammable range causing damage	• Filling of bulk liquids is only performed by trained operators with attendance of trained internal operator. • All filling points are clearly marked and locked for safety located inside the factory to prevent unauthorized access. • In the event the mistake was to occur the bulk tank is located inside the factory in its own bunded excluded area with ventilation to the roof above and is free of any combustibles.
Emissions of unscrubbed / inadequately scrubbed fumes from fume scrubbers	Bunded Awning area – • Water Treatment Plant • Scrubbers	Unacceptably high occupational exposures to respiratory irritants inside the factory if plant fails.	• Fume scrubber has SMS reporting to all internal emergency contacts 24 hours/7 days a week that reports status and any potential fault with the plant operation. • Sapphire has a backup scrubber plant in the event of a major failure of main plant.

8. SITE EMERGENCY RESOURCES

8.1. Firefighting trained personnel

Training is provided on a regular basis (annual) for all Emergency Response Team members to ensure that firefighting skills remain current. Records of this training are maintained.

8.2. First Aid Trained Personnel

All site supervisors are trained in Senior First Aid and undergo refresher training every three years.

Records of this training are maintained.

8.3. Evacuation Drills

At twelve monthly intervals, an evacuation exercise is conducted to measure the effectiveness of this plan. All employees are involved in the drill and any deficiencies are noted for corrective action immediately afterwards. A checklist is used to record details.

8.4. In the Event of Fire – Water Containment

In the event of a factory fire significant amounts of water may be used in firefighting.

A fire located in the chemical storage areas will drain to bunded areas and be processed through our water treatment plant and released to sewer in accordance with set limits.

8.5. Utilities - Isolation

In the event of an emergency the Plant Engineer is responsible for turning off electricity and L.P.Gas at the mains supply. Chemical bulk storage tanks can similarly be turned off individually depending on the risk of loss of containment.

Decisions may be made in conjunction with Emergency Services in attendance.

9. EMERGENCY RESPONSE EVACUATION

On hearing the **EVACUATION ALARM** or **INSTRUCTION** from your Supervisor or over the P.A. system to immediately evacuate the premises all Personnel Must:

- Evacuate the building under the direction of Wardens.
- Leave the building by the closest, safe exit.
- Do not gather belongings
- Go to the **EMERGENCY ASSEMBLY AREA** near front gate.
- Stay in your assembly area
- Do not re-enter the building until instructed by Management.
- Do not remove vehicles from the car park unless instructed by Management or Emergency Services
- Wait for instructions for returning to work

9.1 EMERGENCY EVACUATION PROCEDURES

General Duties of Wardens (Supervisors)

- Wardens will check all work areas, offices and rooms including toilets, change rooms and all areas
- where people could be trapped or unaware of the signal to immediately leave the building.
- They will assist with the safe and speedy evacuation of all personnel to the Assembly Area.

Roll Call

- As soon as personnel arrive at the Assembly Area a roll call is to be taken to ensure that Everyone is accounted for.
- The Site Warden or in his absence the Deputy Warden will call the roll using the Employee Checklist and Visitors Book.
- This identifies whether employees, visitors or contractors are Present, Absent or Missing and should ensure that everyone is accounted for.
- If there is someone missing, the Site or Deputy Warden must inform – The Senior Manager on site
Or
- The Officer-In-Charge of the Emergency Services

All Clear Signal

When the emergency is over all personnel will be advised whether to resume work or given alternative instructions by Management of the company.

10. INTERNAL REPORTING

All incidents and near misses must be reported to your Supervisor and this is to be detailed in the Daily Report Email within 1 business day of the incident occurring.

Investigations will be undertaken with the relevant staff to determine the cause of the incident and identify corrective and preventive actions to ensure that the incident does not re-occur. All corrective and preventive actions will be reviewed within 3 months of the implementation to determine if the actions were 'effective' or 'ineffective'.

Where the action is determined to be 'not effective', additional corrective/preventative actions will be identified and implemented.

11. COMMUNICATION

Communication is an important aspect of managing any response to a pollution incident. The mechanisms used and the information provided to stakeholders will depend on the circumstances of the pollution incident. The objective of communication is to ensure that those potentially affected by a pollution incident know what has happened, how they may be affected by the incident, what they can do avoid potential harm, and to explain what Sapphire is doing to respond to the incident.

Following a pollution incident, the occupiers of neighbouring premises will be notified via a letterbox drop/door knock. An assessment of who should be notified will be undertaken by the Production Manager. In most cases, a pollution incident will be confined to a particular location and notification to stakeholders can be handled by the erection of warning signage.

Where the incident is not confined to a particular area and/or may have a significant impact upon the environment the following types of communication mechanisms are to be considered when selecting an appropriate means of providing stakeholder notification:

- Phoning stakeholders.
- Emailing stakeholders.
- Issuing of media releases.
- Posting of notices on Sapphire's website.

12. TESTING AND REVIEW

This plan will be reviewed and tested annually to ensure that the plan is accurate and up-to-date, and that the plan is capable of being implemented in a workable and effective manner. In addition, the plan will be reviewed and tested:

- Within one month of any pollution incident (or near miss) occurring.
- When legislative requirements are changed.
- When there is a change in work processes.

The scenarios tested will be obtained from the hazards identified in the Chemical Spills Risk Assessment and those with the highest risks will be tested as a priority. Two methods will be utilised which include undertaking desktop reviews and practical drills. The results will be detailed in the Testing and Review Log (see Appendix 9)

13. DANGEROUS GOODS MANIFEST

Product Name	Max Qty Stored	Hazchem	D.G. Class	Hazardous YES/NO
Acetic Acid 90%	25 lts	2P	8	Y
Acetylene Gas	9.3 m3	2(S)E	2.1	Y
Argon	10.5 m3	2T	2.2	N
Alfisatin	1000 lts	2R	8	Y
Alphacol IG	25 kg	2X	6	Y
All purpose thinners	20 lts	3YE	3	Y
Alubrite	1000 lts	2X	8	Y
Aluminium Hydroxide	5 tonne	N/A	N/A	N
Aqua ammonia 25%	25 lts	2R	8	Y
Chroicoat L26	10 lts	N/A	N/A	N
Chroicoat T3B	25 lts	2X	8	Y
Coregas 5/2	10.6 m3	2TE	2.2	N
Deoxidiser LNC	25 LTS	N/A	8	Y
Duralloy Powder	25 lts	N/A	N/A	N
Gardoclean T 5497	25 lts	2S	8	Y
Gardoetch 8300	1000 lts	N/A	N/A	N
Gardoseal Z 1959	25 LTS	N/A	N/A	N
Liquefied Petroleum Gas (LPG)	2 x 9 kg	2YE	1	Y
Marathon re-moove-it cleaner	200 mls	N/A	N/A	N
Metalium XDP 2000	5 lts	N/A	N/A	N
Mineral turps	5 lts	3Y	3	Y
Nickel acetate crystals	25 kg	2Z	9	Y
Nitric Acid 60%	1000 lts	2R	8	Y
Nuplex nipacide CI 15	20 lts	2X	8	Y
Orange squirt cleaner	200 mls	N/A	N/A	N
Oxygen	8.9 m3	2S	2.2, 5.1	Y
Sanodye Blue G	5 kg	N/A	N/A	N
Sanodure Bronze 2 LW	5 kg	N/A	N/A	N
Sanadol Deep Black MLW	5 kg	N/A	N/A	N
Sanadol Fast Gold L	5 kg	N/A	N/A	N
Sanodure Greu NL Liquid	5 kg	N/A	N/A	N
Sanadol Red	5 kg	N/A	N/A	N
Sanodye Yellow 3 GL	5 kg	N/A	N/A	N
Sodium Acetate Crystals	25 kg	N/A	N/A	N
Sodium Hydroxide 50%	3000 lts	2R	8	Y
Stabilizer AC 812	25 kg	N/A	8	Y
Stannous Sulphate	20 kg	N/A	8	Y
Sulphuric Acid 98%	2000 lts	2P	8	Y
Robot Cutting Compound	20 lts	N/A	N/A	N
Wax & Grease remover	20 lts	3 YE	3	Y
Note; N/A = None Allocated.				