

**Regain Spent Potliner Reprocessing Facility**

**Kurri Kurri Aluminium Smelter**

# **Pollution Incident Response Management Plan**



<b>Objectives</b>	<p>Comprehensive and timely communication about a pollution incident to all recognised stakeholders</p> <p>Identification and control of risk of a pollution incident</p> <p>Implementation of this plan and verification of its effectiveness.</p>
<b>Background</b>	<p>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 <i>Protection of the Environment Legislation Amendment Act 2011</i> (POELA Act).</p> <p>Regain operates an aluminium smelter spent potliner (SPL) reprocessing plant on the site of the Hydro Aluminium smelter at Hart Road, Loxford near Kurri Kurri, NSW. Regain holds Environment Protection Licence No. 13268 issued under the New South Wales <i>Protection of the Environment Operations Act</i> (POEO Act).</p> <p>A Pollution Incident is defined under the POEO Act as follows:</p> <p><i>'pollution incident</i> 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.'</p> <p>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:</p> <p>(a) harm to the environment is material if:</p> <p>(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</p> <p>(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</p> <p>(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.</p>
<b>Scope of This Plan</b>	<p>This PIRMP applies to the Regain aluminium smelter spent potliner reprocessing plant on the site of the Hydro Aluminium smelter at Hart Road, Loxford near Kurri Kurri,</p>
<b>Other Related Plans</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• Regain Environmental Policy</li> <li>• Environmental Management Plan – SPL Reprocessing Facility Kurri Kurri</li> <li>• Emergency Response Plan – SPL Reprocessing Facility Kurri Kurri</li> </ul>

## Hazards and Pre-emptive Actions

Hazards that could credibly cause material harm to the environment as defined in the POEO Act and the pre-emptive actions taken to control the risks associated with these hazards are set out in the following table.

**Table 1 – Hazards and Pre-emptive Actions**

<b>Hazard</b>	<b>Pre-emptive Actions</b>
Dust generated during loading/unloading of SPL material and general process operations of the SPL facility generates	Dust is largely captured by the dust extraction systems on buildings and plant. Operators are notified of dust extraction system failure through the alarm system.  SPL storage, crushing and grading operations is on concrete flooring within covered sheds, thus limiting dust release into the atmosphere.
The process of adding water to the SPL material in the water mixer causes the release of flammable gases.	An interlock is fitted to the water supply system and induction fan, so that in the event of the fan stopping, the water supply is isolated, and gas release is limited.  Vent high points of plant and buildings to avoid build-up of hydrogen gas.
Flameout of natural gas fired dryer burner may cause an explosion due to a build up of unburnt gas	Burner management ensures that the dryer burner is safely controlled and does not continue to load the dryer with unburnt gas in the event of flameout.
Natural gas leak	Natural gas isolation valve located at easily accessible place.  Natural gas isolation included in operator training.
Storm water becoming contaminated through contact with SPL materials	Storm water is carefully managed through the Hydro Aluminium Storm water Drainage System. Good housekeeping of the concrete apron prevents contamination of rainwater falling on to the pad around silos and loading area.

## Inventory of Pollutants

A register of hazardous materials that are stored on the site is kept at the Regain Site office.

## Safety Equipment

Safety equipment used to minimise the risks to human health or the environment or to control a pollution incident include:

- Fire extinguishers
- First Aid kits
- Run-off water control system
- Personal protective equipment including – safety glasses, safety hats, face masks, long sleeved high visibility cotton shirts, long cotton pants, steel capped enclosed footwear, gloves and hearing protection.

## Contact Details

Contact details, including names, position titles and 24 hour contact details of key individuals responsible for activating this PIRMP and 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 the Hydro Aluminium Smelter emergency response protocols.

In the event of a pollution incident the Regain operator places a first call to Kurri Kurri smelter plant emergency number 200 who then coordinate local response and urgent contact with Fire and Rescue NSW, the NSW Police and NSW Ambulance Service.

Regain management contacts are:

- John Cooper, Operations Manager, tel. number 0418 341 756
- Kevin Cooper, NSW Regional Manager, tel. number 0417 556 831

Regain Manager to notify authorities in the following order:

1. EPA – Environment Line 131 555
2. Ministry of Health via local Public Health Unit – John Hunter Hospital telephone number (02) 4924 6477
3. WorkCover – telephone number 13 10 50
4. Cessnock City Council – telephone number (02) 4993 4300
5. Fire and Rescue NSW – telephone number 000

## Communicating with Neighbours and Local Community

The Hydro Aluminium plan for communicating with neighbours and local community provides the processes, list of contacts and contact protocols. A Regain manager will work with Hydro 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 will be 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.

## Maps

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 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 will include responsibilities under this PIRMP, the POEO Act and POELA Act. This training and nurturing of general awareness will be 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 with 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.regain.com.au/Environment/Default.aspx>. Members of the public may download this version. The web page displays information on how to contact Regain.

## Testing and Review of this Plan

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

This PIRMP is a controlled document within the Regain Management System and will be subject to a Regain Management Review to ensure the ongoing effectiveness of this PIRMP and management commitment to it.