Bisalloy
PERFORMANCE STEELS

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

BISALLOY STEELS PTY. LTD.
18 RESOLUTION DRIVE
UNANDERRA NSW 2526

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN - LICENCE NUMBER: 21398

Approved by: Shane Wilson

Position/Title: Manufacturing Manager

Date: 6 January 2026

PURPOSE:

Bisalloy Steels holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Bisalloy Unanderra premises. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at Bisalloy Steels – 18 Resolution Drive Unanderra, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan has been developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.

## Environment Protection Licence (EPL) Details

| | |
|---|---|
| Name of licensee: | Bisalloy Steels Pty Ltd |
| ABN: | 22 098 674 545 |
| EPL number: | 21398 |
| Premise's name and address: | Bisalloy Steels – 18 Resolution Drive Unanderra NSW |
| Company or business contact details | Name: Andrew Wilkinson<br>Position or title: Engineering, Maintenance & Environment Manager<br>Business hours contact number/s: (02) 4272 0428.<br>After hours contact number/s: 0438 628 932. |

| | |
|---|---|
| | **Email:** Andrew.wilkinson@bisalloy.com.au |
| Website address: | www.bisalloy.com.au |
| Scheduled activity/activities on EPL: | Metallurgical Activities |
| Fee-based activity/activities on EPL: | Metal processing; 0-100,000 tonnes per annum |

## Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

| | |
|---|---|
| PIRMP activation | Name of person responsible: Dean Thomson/ Dan Hajduk/ Joel Rogan<br>Position or title: Team Leader (shift)<br>Business hours contact number/s: (02) 4272 0423.<br>After hours contact number/s: (02) 4272 0423.<br>**Email:** Andrew.wilkinson@bisalloy.com.au |
| Notifying relevant authorities<br>Notification should be made by a person with an appropriate level of authority within the company. | Name of person responsible: Shane Wilson<br>Position or title: Manufacturing Manager<br>Business hours contact number/s: (02) 4272 0478.<br>After hours contact number/s: 0437 972 719<br>Email: shane.wilson@bisalloy.com.au |

| | |
|---|---|
| Managing response to pollution incident | Name of person responsible: Andrew Wilkinson<br>Position or title: Engineering, Maintenance & Environment Manager<br>Business hours contact number/s: (02) 4272 0428.<br>After hours contact number/s: 0438 628 932.<br>Email: Andrew.wilkinson@bisalloy.com.au |

## Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Relevant authorities include:

| | | |
|---|---|---|
| Fire & Rescue NSW / Rural Fire Service (first notification) | Contact number/s: | 000 |
| EPA | Contact number/s: | 13 15 55 |
| NSW Health – Illawarra Shoalhaven Local Health District - Wollongong Hospital | Contact number/s: | 4222 5000 |
| SafeWork NSW | Contact number/s: | 13 10 50 |
| Wollongong City Council | Contact number/s: | 4227 7111 |
| Sydney Water | Contact number/s: | 13 20 90 |
| Jemena (Gas Supply) | Contact number/s: | 131 909 |
| Police – Wollongong Police station | Contact number/s: | 000 / 1800 333 000 |
| State Emergency Services (SES) | Contact number/s: | 132 500 |
| Roads and Maritime Services | Contact number/s: | 131 700 |

## Notification of neighbours and the local community

Occupiers of adjacent properties are to be advised of Environmental Incidents as soon as practical by phone call. This is to be done by the Incident Manager after notification of the incident. Regular updates to neighbours are also to be provided by the Incident Manager by phone.

| | | |
|---|---|---|
| Go Hire | Contact number/s: | 4272 7777 |
| Liebherr Cranes | Contact number/s: | 4272 2044, 0434 318 377 |
| Wollongong Civil Contractors | Contact number/s: | 4272 3336 |
| Bluescope Steel - Welded Products | Contact number/s: | 4272 2544 |
| DGL - Hydromet | Contact number/s: | 4274 2100 (office) Ops Manager – 0435 565 343 |

| Pollution Risk Management Table | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Machine / Area** | **Hazard / Opportunity Type** | **"What" Can Happen?** | **"How" Can it Happen?** | **Current Controls** | **Proposed Controls** | **Action Required** | **Review June 2024 - 4 June 2024** | **Consequence** | **Likelihood** | **Current Risk Score** | **Rating** |
| Workshop | Environmental release | chemical/solvent/lubricant spill or loss on containment | Unknown effects of chemicals/solvents/lubricants, contamination of air, soil, wastewater | 1. Pre-operational checks on chemicals/solvents/lubricants before use<br>2. PPE clothing, eye & respiratory protection<br>3. MSDS on file and indicate appropriate PPE & emergency response<br>4. Spill kits<br>5. Access control | 1. Operator Training<br>2. Operator competency assessment<br>3. Auditing of chemical handling & use.<br>4. Update Emergency response training | None | Satisfactory | 1 | 2 | 2 | L |
| Workshop | Opportunity | Material recycling | separation of waste metals | none, common bin | Separate waste metals bins | New Signage In place. New Recycled waste bins put in place | Satisfactory | 1 | 1 | 1 | L |
| Crane | Environmental release | Damage to truck fuel/hydraulic systems by dropped or dislodged plate loads during loading or unloading | 1. Magnet/Crane failure<br>2. Truck moves during loading/Unloading<br>3. Uncontrolled swinging of suspended load | 1. Dedicated loading/Unloading bays<br>2. Environmental response equipment provided<br>3. Environmental response training.<br>4. Crane driver training<br>5. Driver safe zones during loading - not allowed in truck cabin | 1. Dual hoist beams and fixed rotation crane beams to prevent uncontrolled load rotation | None | Satisfactory | 2 | 1 | 2 | L |
| Finishing | Explosion & Environmental release | Explosion of Spray Paint cans | Incorrect handling, use & storage of spray paint cans | 1. Pre-operational checks on spraying<br>2. Careful mixing of cans<br>3. Careful placement of cans<br>4. Communication of explosion hazards (Safety Alert)<br>5. Flammable storage cabinets<br>6. Stencilling robot to reduce use of spray cans | 1. Operator Training<br>2. Operator competency assessment<br>3. Auditing of Spray can Handling & use. | None | Satisfactory | 2 | 1 | 2 | L |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Finishing | Waste placement of empty paint spray cans to landfill | Spray cans placed in general waste bins | Employees not recycling | 1. Spray can recycle bins in usage areas<br>2. Employee training in recycling | 1. Reduce spray can usage by spray robot<br>2. Auditing of Spray can disposal | None | Satisfactory | 1 | 2 | 2 | L |
| Forklifts/Trucks | Environmental release | Damage to truck fuel/hydraulic systems by dropped or dislodged plate loads during loading or unloading | 1. Forklift failure<br>2. Truck moves during loading/Unloading<br>3. Uncontrolled dropping of suspended load (e.g. during braking, hydraulic hose failure etc.) | 1. Mobile pre-operation checks<br>2. Environmental response equipment provided | 1. Environmental response training<br>2. Environmental response kits<br>3. Environmental Incident response drill | None | Satisfactory | 2 | 1 | 2 | L |
| Forklifts/Trucks | Environmental release | Exhaust emissions from trucks & mobile equipment | Lack of maintenance to mobile equipment | 1, Programmed maintenance on mobile equipment<br>2, Daily operator start checks | NA | None | Satisfactory | 2 | 2 | 4 | L |
| Furnace | Explosion/ Gas escape | Uncontrolled Explosion/ Release of Gas | 1. PLC- Failure of system<br>2. Failure of light up interlocks | 1. Fail safe shutdown<br>2. Emergency procedures<br>3. Light up sequence procedure<br>4. Operator training & competency assessment | 1. Ongoing failsafe testing of combustion systems<br>2. Improvements to gas system integrity, including gas mains isolation | None | Satisfactory | 4 | 1 | 4 | L |
| Furnace | Environmental release | Greenhouse gas emissions (CO2e) | Combustion by-products | 1. Routine maintenance & tuning of furnace burners<br>2. Optimising of Production plans & minimisation of temperature change delays<br>3. Use of exhaust heat for preheating plates | 1. Emissions measurements & improvement targets | Testing as per program | Satisfactory | 2 | 1 | 2 | L |
| Quench Pond | Environmental release | Discharge of contaminated water from Quench Pond overflow to storm water | Oils or greases washed out of lubrication points in Quench tower; Possible metal, biological, biocide and inhibitor contaminants in water | 1. Routine maintenance of quench rollers<br>2. Greasing procedure to prevent overfill<br>3. Addition of flocculant to capture oils & grease in mill scale<br>4. Analysis of pond water monthly | NA | Improving and requires continuous monitoring | Satisfactory | 2 | 2 | 4 | L |
| Finishing | Waste placement of spent shot media to landfill | Waste shot placed into landfill | Waste shot placed into landfill | 1. Recycling of spent shot & dust | NA | None, unless we change vendor | Satisfactory | 1 | 2 | 2 | L |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Forklift/Truck | Environmental release | Diesel leak when refuelling mobile equipment | 1. Overfilling<br>2. Truck/Fork moves during refuelling | 1. Refuelling area away from drains<br>2. Environmental response equipment on refuelling truck and on site<br>3. Environmental Spill kits available | 1. Environmental response training | None | Satisfactory | 2 | 1 | 2 | L |
| Chemical Spill | Loss of containment | chemical/solvent/lubricant spill or loss of containment | Leakage during use, storage or transportation | 1. MSDS register (ChemAlert) of all chemicals, solvents, lubricants<br>2. Bunding of bulk lubricant storage areas<br>3. Environmental Spill kits available | 1. Environmental response training | None | Satisfactory | 2 | 1 | 2 | L |
| Solvent/Lubricant Fire | Fire/explosion | flammable solvent/lubricant fire | Fire during use, storage or transportation of solvents/lubricants | 1. All solvents, lubricants stored in flame proof cupboards<br>2. Fire risks in MSDS<br>3. Hot work permit system<br>4. Environmental Spill kits available | 1. Environmental response training | Reminder to keep cupboards closed | Satisfactory | 2 | 1 | 2 | L |
| Sustainability | Sustainability opportunity | Opportunity to promote sustainability of Bisalloy products | Promotion in web, industry associations | 1. Sustainability section on Bisalloy website | | None | Satisfactory, Website updated | 1 | 1 | 1 | L |
| Sustainability | Sustainability opportunity | Opportunity to promote nesting efficiency of custom sizes | Promotion of advantages in web, industry associations | 1. Sustainability section on Bisalloy website | | None | Satisfactory, Website updated | 1 | 1 | 1 | L |
| Environmental Management System | Sustainability opportunity | Opportunity to promote Environmental responsibility | Promotion in web, industry associations, customers (especially defence) | 1. Sustainability section on Bisalloy website<br>2. Gained accreditation to ISO 14001 EMS | 1. ISO 14001 logo on all communications | Comms to Sales & Marketing | Satisfactory, Website updated, LinkedIn Updated, Exhibitions | 2 | 2 | 4 | L |
| Sustainability | Sustainability opportunity | Promotion of unlimited recycling opportunity of Bisalloy Products | Development of Environmental Product Declaration (EPD) | Complete | | None | Satisfactory, Website updated | 2 | 2 | 4 | L |
| Administration | Waste paper | Wastepaper placed into landfill | Employees not recycling, paper-based administration | 1. Reduction in paper-based systems<br>2. Employees encouraged to recycle wastepaper and cardboard | All printers configured to double sided printing | None | Satisfactory, General waste from site has been halved. | 1 | 2 | 2 | L |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Electricity Consumption | Energy Usage | Greenhouse gas emissions (CO2e - Type 2) | Electrical consumption by production units, lighting, ITC systems | 1. Turning production units off when not in use<br>2. Soft starts/idling on motors<br>3. High efficiency lighting<br>4. Timeouts on PC's | 1. Motor control processes<br>2. Solar panel proposals<br>3. Fix compressed air leaks | New Projects designed for energy reduction | In Progress | 2 | 1 | 2 | L |
| Gas Consumption | Energy Usage | Greenhouse gas emissions (CO2e Type1) | Gas consumption by production furnaces | 1. Turning furnaces off when not in use<br>2. Regular furnace tuning<br>3. Pulse firing on tempering furnace<br>4. Use of exhaust heat in preheat zone (hot box) | NA | None | In Progress | 2 | 2 | 4 | L |

## Actions to be taken during or immediately after a pollution incident

Bisalloy has in place Emergency plans, including the following actions to be taken immediately after a pollution incident to reduce or control any pollution. These include the following actions:

1. Identify the source of pollution.
2. Isolate or shut off source of pollution if possible.
3. Place containment equipment around any liquid spills to prevent spread.
4. Determine the magnitude of the environmental threat. This includes the nature of the pollution, the amount released, and likelihood of escape from the premises.
5. Activation of Evacuation alarms, if necessary, for the protection of personnel from potential harm
6. Upon activation of Emergency alarm, Emergency evacuation wardens to ensure orderly evacuation of all personnel, visitors & contractors to Emergency assembly point. Attachment
7. Request for assistance from external Emergency services providers.
8. Activation of Emergency plans through escalation to the Bisalloy Chef Emergency Warden
9. Notification to occupiers of adjacent properties and community of the nature and extent of the Environmental threat
10. Containment and clean-up of the Environmental release
11. Root cause analysis and preventative actions to ensure prevention of future release.
12. Debrief of personnel, occupiers of adjoining properties and community, communicated by letter drop.
13. Debrief by Bisalloy Emergency Planning Committee (EPC), and corrective actions implemented.
14. Conduct of an Emergency response drill, conducted and documented within 1 month of any major Environmental release.

Bisalloy has in place Emergency plans, including the following actions to identify risk of harm to human health, and reduce that risk by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk:

1. Identify the type of pollution.
2. Isolate or shut off source of pollution if it is possible to do without physical contact with the substance.
3. Consult Material Safety Data Sheets on Bisalloy's ChemAlert repository for appropriate PPE and handling instructions
4. Determine the magnitude of the environmental threat. This includes the nature of the pollution, the amount released, and likelihood of escape from the premises.

5. If type of pollution cannot be identified, or if Safety Data Sheets are unavailable, call external emergency services on 000 for assistance. Activate Emergency alarms and remove all personnel from areas of potential exposure to the substance. Chief Emergency Warden to be called as soon as practical for further advice and assistance. Occupiers of adjoining properties to be advised as soon as practical if there are potential impacts beyond boundaries of property.
6. If nature of substance is known, and appropriate Personnel Protective Equipment and containment equipment is available, shift Team Leaders to co-ordinate clean-up and reporting to Chief Warden as soon as practical.
7. Chief Warden to arrange appropriate support for clean-up, disposal of pollutants, and independent confirmation of decontamination.
8. Subsequent incident investigation to recommend improvements to systems and equipment to reduce risk of harm to human health.
9. Debrief of personnel, occupiers of adjoining properties and community, including offer of medical support through the company's EAP program.
10. Debrief by Bisalloy Emergency Planning Committee (EPC), to recommend improvements to systems and equipment to reduce risk of harm to human health.
11. Conduct of an Emergency response drill, conducted and documented within 1 month of any major Environmental release, including testing of improvements to systems and equipment to reduce risk of harm to human health.

## Coordinating with persons

The following communication and escalation procedures are in place at Bisalloy for coordinating with the authorities and/or notifiable parties:

All communications to internal and external stakeholders are in the first instance are to be made through the Chief Warden (or his nominated deputy). The Chief Warden will escalate enquiries and communications to Senior Management and Company officers as required.

Contact details for the Chief Warden are as follows:

Managing response to pollution incident

| | |
|---|---|
| Name of person responsible: | Andrew Wilkinson |
| Position or title: | Engineering and Maintenance Manager |
| Business hours contact number/s | 02 4272 0428 |
| After hours contact number/s: | 0438 628 932 |
| Email: | andrew.wilkinson@bisalloy.com.au |

## Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

| Training Date | Trainer | Trainees | Details of Training /Issues identified | Next scheduled training date |
|---|---|---|---|---|
| 14/05/2020 | S Wilson (Production Mgr) | Tower Operators<br>Team Leaders | Procedure for handling pollution complaints (EPA hotline) | May 2025 |
| 14/05/2020 | S Wilson (Production Mgr) | Team Leaders<br>Chief Emergency Warden | Familiarisation with PIRMP process | May 2025 |

## Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

Detail the way the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Below are details on tests carried out the PIRMP, including the testing dates and the names of all staff members who carried out the testing):

| **Date tested** | **Tested by** | **Details of test** | **Finding of test, including issues identified** | **Next scheduled testing date** |
|---|---|---|---|---|
| 18/3/2025 | A Wilkinson | Shot Dust Spill simulation | Regular cleanup after changing collection bags both reduces the risk of a pollution incident as well as making cleanup easier | Mar. 2026 |
| 15/01/2024 | A Wilkinson | Flood Emergency Plan | Plan was found to be adequate to dealing with ingress of water to critical areas and prevent any pollution from BIS leaving the site | Jan. 2025 |
| 17/09/2021 | J. Cabello | Oil Spill Simulation | Update of on-site PIRMP Checklist Form | 17/09/2022 |
| 13/5/2020 | J Cabello (Maint Mgr)<br>I Green (SQE Mgr)<br>D McLeod (Forklift Driver) | Simulation – spill of oil drum from forklift | Suggestion to include barrier tape in spill kits (see attachment 6 for details) | 13/05/2021 |

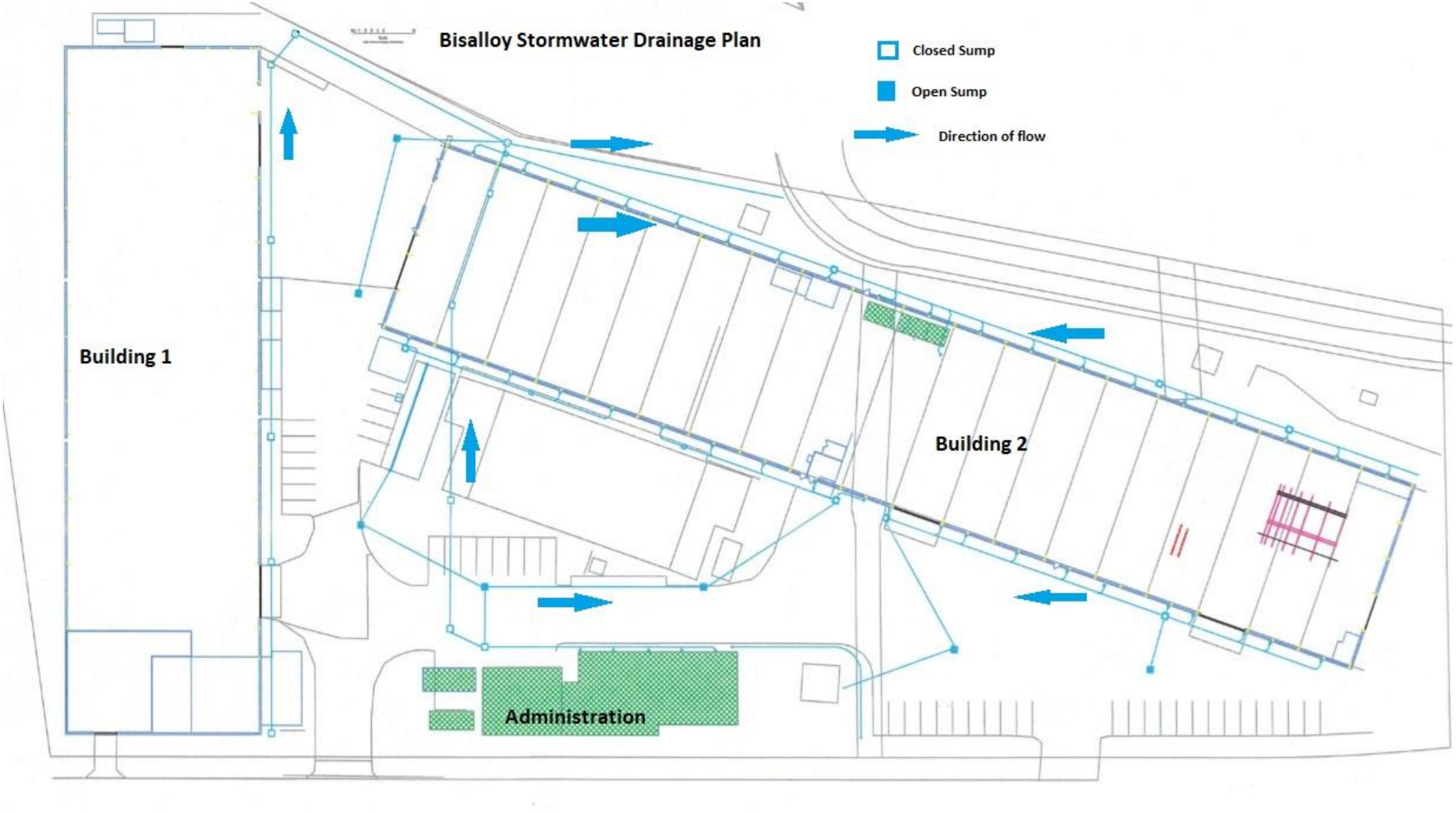
**PIRMP update details**

| Date update occurred | Reason for update | Details of updates | Date the updated version uploaded to website (if applicable) | Date of completion |
|---|---|---|---|---|
| 7/07/2020 | New Document | New Document | 7/07/2020 | 7/07/2020 |
| 14/05/2021 | Contact details revised | Annual submission review | 14/05/2021 | 14/05/2021 |
| 17/09/2021 | Update of contact numbers | DGL / Hydromet Change of contact details. | 17/09/2021 | 17/09/2021 |
| 16/05/2022 | Changes of Personnel | S. Wilson replaces M. Enbom | After 17/05/22 | 17/05/2022 |
| 17/06/2024 | Changes to Roles, Update of Plan | A Wilkinson replaces J. Cabello as chief warden | 24/06/2024 | 15/01/2025 |
| 15/01/2025 | Changes to Roles, Update of Plan | A Wilkinson replaces J. Cabello | 15/01/2025 | 15/01/2025 |
| 15/01/2025 | Identified required walkway routing changes | Need to modify site map to reflect new walkways | TBA | TBA |
| 15/05/2025 | PIRMP Testing updated | Added March 2025 simulation test | 15/05/2025 | 15/05/2025 |
| 6/01/2026 | Annual Review | Added reference to ChemAlert, general date and formatting changes | 12/01/2026 | 12/01/2026 |

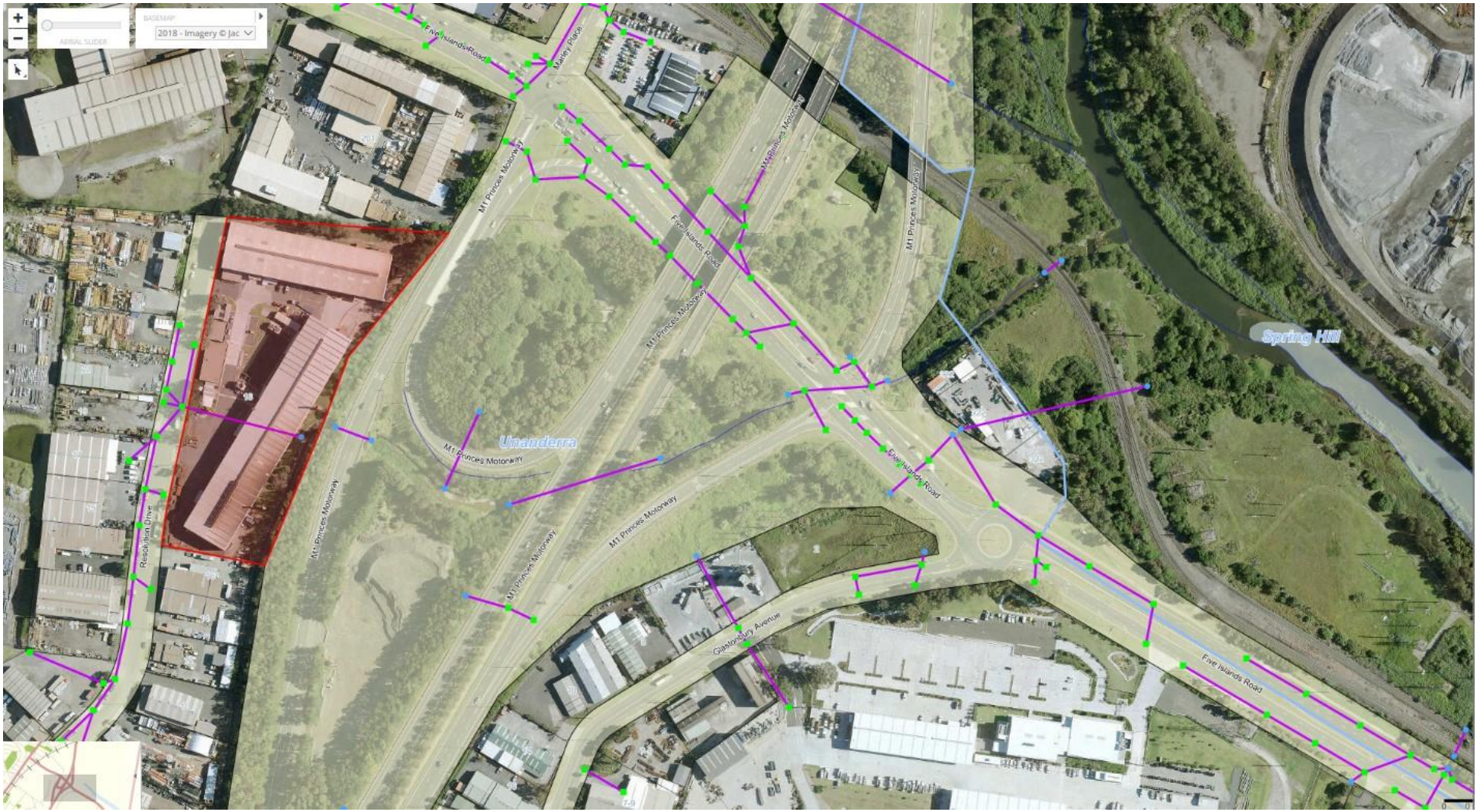
Attachment 1: Bisalloy Emergency Equipment Map

Attachment 2: Bisalloy Neighbouring Properties Map

Attachment 3: Bisalloy Site Drainage Map



Attachment 4: Wollongong City Council Stormwater Assets - Local Area Drainage Map




Attachment 5: Bisalloy Emergency Wardens

| WARDEN CLASSIFICATION | PRIMARY WARDEN | BACKUP WARDEN | AREA |
|---|---|---|---|
| CHIEF | Andrew Wilkinson | Rob Mace | Maintenance |
| Evacuation | Team Leader 1 | Team Leader 2 | Production |
| Area | Matt Fleming | TBA | Admin/ICT |
| Area | Willy Pang | Marc Smith | Technical |
| Area | Mick Reay | Manu Tunga | Laboratory |
| Area | Rob Mace | Shift Fitter | Contractors |
| Area | Shane Wilson | Stephen Quinn | Main Office |
| Area | Material Control Co-ordinator | Material Control Operator | Despatch |

The following employees play a vital role if an evacuation is required.

**CHIEF**

Andrew Wilkinson: Chief Fire Warden

The role of the Chief Fire Warden is to coordinate with the emergency services.

EVACUATION

Shift Supervisors: Fire Warden

The role of the Evacuation Fire Warden is to coordinate the evacuation and account for all personnel at the assembly area.

AREA

Emergency Evacuation Wardens

The role of the Area Emergency Evacuation Warden is to account for the employees within their work area at the assembly point.

Accounting for employees and visitors at the assembly area:

Area Emergency Evacuation Wardens will advise the Chief Warden that all employees from their work area are present.

The Chief Warden will check the sign-in list obtained from the Swiped-On website and ensure all visitors/contractors are accounted for.

Once all employees and visitors/contractors have been accounted for and the Chief Warden / Fire warden advises the area is safe, employees can depart the assembly area.

Attachment 6: Bisalloy Pollution Emergency Response Drill held 13 May 2020

Attachment 7: Bisalloy Pollution Complaints Procedure (Pages 1-3)

| Bisalloy | Wardens Report<br>Safety Drill – 13 May 2020 | | Date: 13 May 2020<br>File:safety drill report 13may20 |
|---|---|---|---|
| Author: | J. Cabello | Attendees:<br>Dale McLeod (Forklift driver)<br>Ian Green (SQE Manager)<br>Jose Cabello (Maintenance & Engineering Mgr) | Attention: I. Green,<br>Safety Wardens, M. Enbom |
| Dist: | | Security: | Internal |

**Team,**

A safety drill scenario was executed successfully today. The scenario used was that of forklift carrying a drum of oil was dropped in the front driveway area of Building 2. The driver was only advised of the scenario just as he arrived at the scene and was not given any other advice other than to react as if it were for real.

**Result:**

The driver, immediately stopped the forklift, took in the scene, and brought in the nearest spill kit. Within minutes he had bunded off the downstream side of the spill to prevent entry into the adjacent drain

He then sought out and placed safety bollards on the extremities of the spill and then taped the area off.

By not moving the forklift, he preserved the incident site so that it could be properly investigated later.

Once the spill was under control, he was asked what his next steps would be, and he responded it would be to advise his team leader.

Although the drill was terminated at this point, it would be expected that the team leader would then take over control of the situation and with his own assessment, provide additional controls, escalate control of the incident an din all circumstances, advice the warden and complete a Bis Safe Incident Report.

**Other Key learnings:**

Perhaps greater consideration of the drain could be done with more bunding around it because the spill on the ground can always be cleaned up, but once its in the drain, it's almost impossible

The warning tape to be included in the spill kits. Dale had to search in the cutting area for a roll.

# Pollution Complaints Procedure

## 1. Scope

This procedure describes the processes to be followed in receiving, recording and responding to pollution complaints lodged by members of the public. This procedure applies to all employees of Bisalloy Steels including part-time staff, casuals, contractors and consultants.

## 2. Introduction

Bisalloy holds a licence to operate under provisions of the Protection of the Environment Operations Act (POEO Act 1997). There is a requirement under this licence to receive, record respond and retain details of pollution complaints raised by members of the public. Failure to comply with these requirements constitutes a breach of Bisalloy's EPA licence to operate.

## 3. Purpose

Following this procedure will ensure that Bisalloy complies with licence conditions relating to pollution complaints handling processes.

## 4. Definitions

**Pollution complaints phone line:** Dedicated phone line (02) 4272 0499 This is switched through to Tower during operational hours. This phone number is hosted on the "Contact Us" page of the Bisalloy website.

**Complaints Record:** This is a form which is used to record Date & Time of complaint; The method by which complaint was made; Contact details for complainant; Nature of the complaint; Actions taken in response to the complaint; Follow-up contact to the complainant (See Attachment 1 for blank form)

## 5. Procedure

**A. Receival of complaint**

Usually complaint will be received from members of the public via the Environmental Complaints phone line (02 4272 0499). This phone line is switched through to the Tower during operational hours.

When responding to pollution complaints, the operator is to follow voice prompts on the complaints record form (Attachment 1) to ensure that all required information is conveyed and recorded.



**B. Recording of complaint details**

The following information is required to be recorded:

- Date & time of complaint
- Method of Lodgement
- Complainant contact details
- Nature of complaint
- Actions taken
- Follow-up contact to complaint

**C. Response to complaint**

After all complaint details are received and recorded, Tower operator is to contact Shift Team Leader to investigate the nature and extent of the complaint, and to initiate corrective actions as required.

**D. Response to complaint**

Shift Team Leader is to investigate the complaint, and implement corrective actions as required. Corrective actions may include the following:

- Containment and clean-up of minor spills by shift personnel
- Shut-down of operational activities
- Escalation of the complaint to support staff
- Enaction of the Bisalloy Pollution Incident Response Management Plan (PIRMP)
- Site Evacuation
- Call-in of Emergency Services support

**E. Corrective Actions**

Where the Shift Team Leader is able to contain and respond to the incident on shift, details of action taken are to be recorded on the **Complaints Record** form (Attachment 1). Where situation cannot be resolved on shift, details of escalation are to be recorded on the **Complaints Record** form. Details from the complaints record form are to be logged in Bisafe system as an incident

**F. Follow up to Complainant**

Where the complaint is of minor nature, and the Shift Team Leader is able to contain and respond to the incident on shift, feedback is to be given to be complainant as soon as practical by the Team Leader using phone contact.
Where the complaint is of major nature, and the Shift Team Leader is unable to contain and respond to the incident on shift, feedback is to be given by support staff to the complainant as soon as practical by phone.

## 5. Revision History

23.6.20 New Document

# Pollution Complaints Form

Pollution Complaints Telephone hotline number: (02) 4272 0499

**Dialogue to use when answering phone:**

"Thank you for calling the Bisalloy Steels Pollution complaints phone line."

"I will ask a series of questions, so that we collect the required information to assist with your enquiry"

"Bisalloy has commitments to investigate, rectify and report Pollution Complaints under the Protection of the Environment Operations Act, and our Environment Protection Licence number 21398"

a. Date of Complaint: _____ Time: _____

b. Method of Lodging Complaint Phone / Other (specify) _____

(following fields are to be asked from caller)

c. Name of person lodging complaint: _____Contact Details: _____

d. Nature of the complaint: _____

_____

_____

e. Actions taken on complaint: _____

_____

_____

Name of person logging complaint: _____