EMERGENCY PREPAREDNESS - POLLUTION INCIDENT RESPONSE PROGRAM: Wallaroo Landfill

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1. PURPOSE

Tomago Aluminium (TAC) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA). 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 the premises, 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 the website (www.tomago.com.au/health-safety/emergency-response).

As such this program defines Tomago Aluminium's approach to emergency preparedness and response to HSE incidents at the Wallaroo Landfill Facility. The objective of the program is to ensure:

- Emergency situations that may occur on the Wallaroo Landfill Facility are managed to reduce the severity of incident and impact on site personnel and neighbouring premises.
- Ensure comprehensive and timely communication to the staff at TAC, relevant authorities and people outside the facility that may be impacted.
- Ensure that key personnel responsible for the implementation and maintenance of the plan are identified and staff are trained and experienced to deal with emergency situations.
- Compliance with statutory requirements such as *Protection of the Environment Legislation Amendment Act 2011*

2. SCOPE

This program applies to all activities at the Wallaroo Landfill Facility at Old Swan Bay Road Tomago New South Wales.

Name of licensee: (including ABN)	Tomago Aluminium Company Pty Ltd
EPL number:	6048
Premises name and address:	Wallaroo Waste Facility Old Swan Bay Road Swan Bay 2324
Company contact / PIRP activation details	**Name:** Peter Jaeger **Position or title:** Environment Superintendent **Business hours / after hours contact number/s:** 0408398811 **Email:** peter.jaeger@tomago.com.au **Name:** Danny Oakley **Position or title:** Senior Environment Advisor **Business hours / after hours contact number/s:** 0400482663 **Email:** danny.oakley@tomago.com.au **Name:** Lily Wallis **Position or title:** Health, Safety & Environment Manager **Business hours contact number/s:** 0475 301448 **After hours contact number/s:** 0475 301448 **Email:** Lily Wallis@tomago.com.au
Website address:	www.tomago.com.au
Scheduled activity/fee based activity on EPL	Waste Disposal (Application to land) — Waste disposal by application to land

3. REFERENCES

ES.EMS.003	Wallaroo Landfill Management Plan	120000000108
OHS.MP.011	Records & Record Management	110000000176
	Notification of EHS Incidents	110000000298
PW.EMS.0011	Notification of Neighbours regarding Offsite Impact	120000002255
ES.EMS.0003	Wallaroo Landfill Management Plan	120000000108

4.

4. RESPONSIBILITIES

Task/Details	Health, Safety & Environment Manager	Safety Department	Environment Superintendent
Development and Maintenance of Pollution Incident, Emergency Preparedness and Response Program	X		
Development and Facilitation of Emergency Simulations if required		X	
Notification of statutory authorities of a pollution emergency	X		X
Liaison representative with External Services and Development and Facilitation of Emergency Simulations if required		X	

5. BACKGROUND TO WALLAROO FACILITY

Wallaroo landfill is a Class 2 Solid Waste Landfill according to the classification assigned by the NSW Environmental Authorities. The site currently operates in accordance with an Environment Protection Authority licence issued under the Protection of the Environment Operations Act (Licence # 6048).

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6. WASTE DESCRIPTION

Two smelter production waste streams containing fluorides are the basic source of materials historically disposed of at Wallaroo. These wastes need to be properly managed to avoid uncontrolled leaching of fluoride into the groundwater. All wastes disposed at Wallaroo are kept in capped Landfill cells. The two production waste streams are:

- a fine residue known as “dross” which results from the reaction of air with molten aluminium.
- A carbon dust that results from the shot blast cleaning of anodes

Due to the public debate surrounding development of the landfill in the mid 1980’s, there is a misconception by some that solid wastes containing cyanide components i.e. spent potlinings, have been landfilled at the site. Spent potlinings have never been landfilled at Wallaroo.

Following the development of alternative reuse solutions for the waste materials, Tomago Aluminium ceased disposing of approved smelter wastes at the site in 1999. All cells are capped and the site is regularly maintained

Presently 50,000 tonnes of 'approved smelter waste' is disposed at the facility. This waste was approved by the Environment Protection Authority prior to disposal and certified to contain not more than 150 mg/L leachable fluoride.

The landfill cells are designed to protect the local environment, primarily the groundwater table, from potential uncontrolled leaching of fluorides from the waste materials.

7. HEALTH AND SAFETY RISKS

There is no inventory of hazardous materials or chemicals stored on the site. The landfilled materials do not pose any health and safety risks to personnel visiting or maintaining the Wallaroo site and are assessed to pose no risks under the potential emergency scenarios identified in section 9.

8. MONITORING AND ONGOING MANAGEMENT

Groundwater and surface water on the site and the environs are monitored on a three monthly basis. This monitoring program has been conducted since the site commenced operation in 1987 and to date no elevated levels of fluoride have been detected. Monitoring data is regularly reported to a number of statutory bodies.

Access to the site is closely managed to prevent activities that have the potential to damage the landfill cells and to prevent activities that can cause erosion of the site.

In 2017 a comprehensive review of the monitoring data was conducted by an external consultant. The report from this review can be found at:

\\Tac32\env_sust\Environment Services\ENVIRO\WASTE SITE

9. IDENTIFICATION OF POTENTIAL EMERGENCY SITUATIONS AND PREVENTATIVE CONTROLS

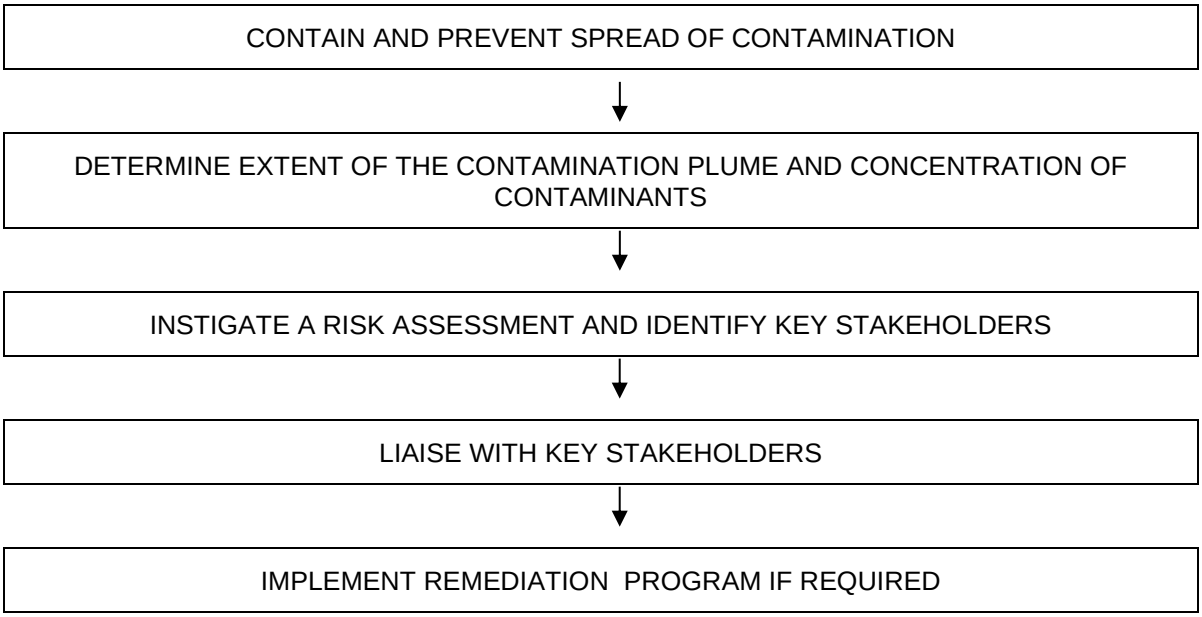
Due to the scale and operational status of the Wallaroo facility potential emergency scenarios are identified to include:

Bushfire

Fire breaks are established around the perimeter fencing and vegetation within the compound are maintained to reduce the bush fire risk. No environmental or health risks are expected if a fire occurred inside the compound. Quarterly visits to the site allow the condition of the fire breaks and vegetation within the compound to be assessed.

Waste storage cell leakage resulting in groundwater contamination.

Groundwater at the Wallaroo landfill facility is sampled and analysed on a three monthly basis. This regular testing will ensure early detection of any waste cell leakage. The following approach would be followed in the event that contamination of groundwater was detected.



10. COMMUNICATIONS OF EMERGENCY SITUATIONS

The Security gatehouse at the Tomago Aluminium Smelter is the Site's Communication and Fire Control Centre. In the event of an emergency, injury or pollution incident the Environment Superintendent will be notified and is responsible for notification of authorities in accordance with TAC procedure:

Notification of EHS Incidents *110000000298*

The security gatehouse is manned on a 7 day/24 hour basis and all external calls should be directed to security on (02) 49669669

In the event that the emergency or pollution incident occurs that has potential to impact on neighbouring properties and/or local communities communication mechanisms are detailed in the TAC procedure

PW.EMS.0011 Notification of Neighbours regarding Offsite Impact 120000002255

11. EMERGENCY RESPONSE MAPS AND SITE PLANS

A detailed series of maps/drawings including property ownership and cell construction can be found in the *Wallaroo Landfill Management Plan 120000000108*

12. RECORDS

Minutes of meetings, simulation results, competency assessments and training plans are to be treated as records in accordance with Plantwide Records Management OHS.MP.011.

This plan is to be tested / reviewed within every 12 months or within one month following its activation. Records of the activation / testing / review of this plan are to be logged in Appendix 1 of this document.

APPENDIX 1 - RECORDS OF TESTING / REVIEW / ACTIVATION OF THIS PLAN

Date of review/test/activation	Reason	Reviewers	New version number
21/11/13	12 monthly testing / desktop review	Robyn Parker & Neil Roser	1
29/12/14	12 monthly review/desktop testing	Neil Roser	2
02/02/16	12 monthly review	Neil Roser & Robyn Parker	3
14/12/16	12 monthly review	Neil Roser & Robyn Parker	4
13/12/17	12 monthly review	Neil Roser, Robyn Parker, Danny Oakley	5
20/11/2018	12 monthly review	Neil Roser	6
25/11/19	12 monthly review	Robyn Parker	7
19/06/2020	Desktop test/review and update	Robyn Parker	8
21/04/2021	Desktop test/review and update	Robyn Parker	9
03/11/21	Desktop test/review and update	Robyn Parker	10
26/10/22	Desktop test/review and update	Robyn Parker	11
17/05/23	Desktop test/review and update	Robyn Parker	13
21/05/24	Desktop test/review and update	Robyn Parker	14
07/02/25	Desktop test/review and update	Robyn Parker	15
15/08/25	Desktop test/review and update	Robyn Parker	16

18/12/2025	Desktop test/review and update	Danny Oakley	17
29/05/2026	Desktop test/review and update	Danny Oakley	18
09/10/2026	Desktop review and personnel update	Danny Oakley / Peter Jaeger	19