

# **Pentarch Forestry**

## Pollution Incident Response Management Plan Narooma



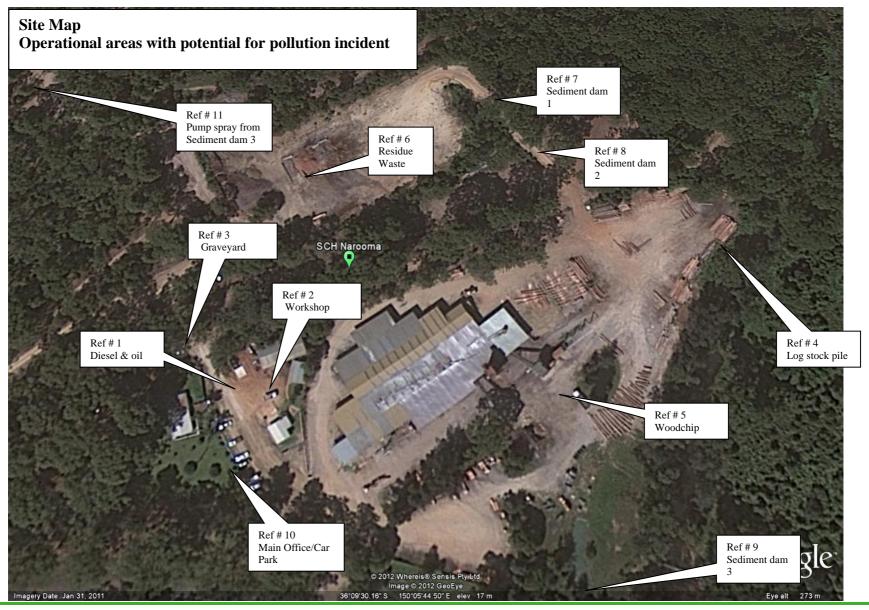
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#### PIRMP Site Assessment Sheet

LIST OF POLLUTING SUBSTANCE STORAGES/USES AT SITE INITIAL ASSESSMENT						
(all Chemicals listed in this sheet are to be subjected to a risk assessment)						
Site Name:	Responsible Person:	Edition Date:				
Narooma Timber Mill	Shaun Jorgensen	16/08/2012				
		Revised: 15/09/2022				

#### **PIRMP Drill**

- Conducted 22:11:12 (incident #1 / 2 / 3 / 9)
- Conducted 11:06:14 (incident #1 / 2 / 3 / 5 / 6 / 11)
- Conducted 07:10:15(incident#2)
- Conducted 12/10/16 (incident #4 / 7 / 8)
- Conducted 09/10/17 (incident #4 / 7 / 8)
- Conducted 13/11/18 (incident #10)
- Conducted 21/11/19 (incident #5)
- Conducted 15/09/20 (incident #4 / 7 /8)
- Conducted 1/11/21 (incident #5)
- Conducted 17/11/22(incident #10)
- Conducted 28/9/2023 (Incident #9)
- Conducted 13/11/2024 (Incident #5)

Name / description	Covered under Hazardous Chemicals/MSDS?	Max amount stored	Location of storage	Map reference	Need for early warning <sup>1</sup>	Current controls	See Risk Ass & PIRMP Response Action (see Below)		
CHEMICALS/FUELS	CHEMICALS/FUELS/LUBRICANTS (raw materials and products which can cause pollution)								
Diesel	Class 3	3000 ltrs	Oil Storage Shed	Ref No 1	N/A	<ul><li>Bunding</li><li>PMP</li><li>Training</li></ul>	Incident # 1-3		

<sup>&</sup>lt;sup>1</sup> Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

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#### PENTARCH FORESTRY NAROOMA

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Name / description	Covered under Hazardous Chemicals/MSDS?	Max amount stored	Location of storage	Map reference	Need for early warning <sup>1</sup>	Current controls	See Risk Ass & PIRMP Response Action (see Below)
						<ul> <li>Spill Kits</li> <li>SOP</li> <li>Inductions</li> <li>Fire Fighting         Equipment</li> <li>Security</li> <li>Emergency Response         Sand/Sawdust</li> <li>Ground Water         Monitoring Wells</li> </ul>	
Oils/Solvents	Class 3	Packaged goods up to 1500 Itrs	Oil Storage Shed	Ref No 1	N/A	<ul> <li>Bunding</li> <li>PMP</li> <li>Training</li> <li>Flammable Cabinet</li> <li>Spill Kits</li> <li>Inductions</li> <li>Fire Fighting Equipment</li> <li>Security</li> <li>Emergency Response Sand/Sawdust</li> <li>Remediator – bio remediation of soils.</li> <li>Ground Water Monitoring Wells</li> </ul>	Incident # 4
Lubricants, Gases	Class 2	Variable. Max at any time 500L.	Maintenance Workshop	Ref No 2	N/A	<ul> <li>Fire Extinguishers</li> <li>Concrete Floor</li> <li>Enclosed Shed</li> </ul>	No Incident Potential

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Name / description	Covered under Hazardous Chemicals/MSDS?	Max amount stored	Location of storage	Map reference	Need for early warning <sup>1</sup>	Current controls	See Risk Ass & PIRMP Response Action (see Below)
						<ul> <li>Containment Cages and flammable storage cabinet.</li> </ul>	
Oils/Fuel	Class 3	Residuals- equipment drained	Redundant Plant and Equipment (Graveyard)	Ref No 3	N/A	<ul> <li>Audits/Inspections</li> <li>Oils/Fuel drained prior to storage</li> <li>Remediator</li> <li>Bunding</li> </ul>	No Incident Potential
MATERIALS (e.g.	stockpiles, silos, bulk s	solids etc)					
Log Stock Pile	N/A	Variable Max 2000tonne	Dedicated on site	Ref No 4	Local Rural Fire Brigade	<ul> <li>Emergency fire equipment.</li> <li>Maintain manageable levels</li> <li>Log stock takes.</li> <li>Security</li> </ul>	Incident # 5
Woodchip	Refer to Boral's MSDS on Woodchip	Variable Max 500m3	Dedicated on site	Ref No 5	Local Bush Fire Brigade	<ul> <li>Emergency fire equipment</li> <li>Maintain manageable levels</li> <li>Security</li> </ul>	Incident # 5
Residue Waste	N/A	Variable. Max 100m3	Dedicated on site	Ref No 6	Local Bush Fire Brigade	<ul> <li>Emergency fire equipment</li> <li>Maintain manageable levels</li> <li>Security</li> </ul>	Incident # 5

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Name / description	Covered under Hazardous Chemicals/MSDS?	Max amount stored	Location of storage	Map reference	Need for early warning <sup>1</sup>	Current controls	See Risk Ass & PIRMP Response Action (see Below)
Dam 1 (Sediment)	N/A	Variable		Ref No 7	N/A	<ul> <li>Continue to irrigate to lower yard to maintain dam levels.</li> <li>Sediment barrier.</li> </ul>	Incident # 6
Dam 2 (Sediment)	N/A	Variable		Ref No 8	N/A	<ul> <li>Continue to irrigate to lower yard to maintain dam levels.</li> <li>Sediment barrier.</li> </ul>	Incident # 6
Dam 3 (Sediment)	N/A	Variable		Ref No 9	N/A	<ul> <li>Continue to irrigate to yard spray to maintain dam level.</li> <li>Ensure pumps are maintained through scheduled maintenance</li> <li>Sediment barrier</li> </ul>	Incident # 6
Ground Water Monitoring Wells	N/A	N/A	Site	N/A	N/A	<ul> <li>Annual water monitoring.</li> </ul>	Incident # 11
Storm Water Drains	N/A	Variable	Site	N/A	N/A	<ul> <li>Straw Bales</li> <li>Rubber and Earthen         Berms         Audits and Inspections     </li> </ul>	Incident # 6
SUBSTANCES IN PI	ROCESSES (substance	s which coul	d be emitted fro	om operation	al process i.e.	treatment plants, vehicles etc)	
Mobile Plant (onsite)	Class 3	Up to 6 mobile plant on site	Dedicated on site	N/A	N/A	<ul> <li>Spill Kits</li> <li>Pre start checks</li> <li>PMP</li> <li>Training</li> <li>Emergency Response Sand/Sawdust</li> </ul>	Incident # 7

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Name / description	Covered under Hazardous Chemicals/MSDS?	Max amount stored	Location of storage	Map reference	Need for early warning <sup>1</sup>	Current controls	See Risk Ass & PIRMP Response Action (see Below)
						<ul> <li>Remediator – bio remediation of soils.</li> </ul>	
Mobile Plant Contractor/visitor	Class 3	Variable	Variable Locations	N/A	N/A	<ul> <li>Spill Kits</li> <li>Pre start checks</li> <li>Training</li> <li>Inductions</li> <li>Emergency Response Sand/Sawdust</li> <li>Remediator – bio remediation of soils.</li> </ul>	Incident # 8
Car Parking up to 20 vehicles	Class 3	Variable	Site Office	Ref No 10	N/A	<ul> <li>Spill Kits</li> <li>Training</li> <li>Emergency Response Sand/Sawdust</li> <li>Remediator – bio remediation of soils.</li> </ul>	Incident # 9
Traffic Areas (dust, chem. leaks &loss	Class 3	N/A	Dedicated on site	N/A	N/A	<ul><li>Training.</li><li>Dust suppression system/water tank with pump.</li></ul>	Incident # 10

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IMPACT ON NEIGHBOURS ASSESSMENT – EARLY WARNINGS								
Site Name: Narooma Responsible Person: Date: 15/9/2022 Shaun Jorgensen Site Manager								
Incident type/description	External Release (air, waterway etc)	Neighbors impacted/extent of impact	Communio methods Early warr		Actions and other cor (e.g. posting on website, co	ntrol measures ommunity group meetings)		
N/A								

#### **EMERGENCY DRILLS CONDUCTED**

Date	Practice Drill	Type of Drill	Rating 1-5 on	Comment
	Completed		Effectiveness	
06/08/2014	06/08/14	Fire (Wormald)	5 Highly Effective	Minimal Recommendations
11/06/2014	11/06/14	Incident #1,2,3	4 Effective	Train Emergency Response Team on use of
		Shaun Jorgensen – Site		spill kit by 30 <sup>th</sup> Sept. 2014
		Supervisor		Responsible – Shaun Jorgensen
		Steven Kostiuk – HSE		Follow Up – HSE Advisor
11/06/2014	11/06/14	Incident #5	4 Effective	No actions required
		Shaun Jorgensen – Site		
		Supervisor		
		Steven Kostiuk – HSE		
11/06/2014	11/06/14	Incident #6,11	5 Highly Effective	Dams are to be monitored and inspected for
		Shaun Jorgensen – Site		levels and integrity.
		Supervisor		Pumps are to be maintained through
		Steven Kostiuk – HSE		scheduled maintenance.
				Annual ground water monitoring program.
09/10/2015	07/10/15	Incident # 12	4 Effective	Fit for Purpose size decanting containers
		Shaun Jorgensen- Site		Ensure Spills Kits are maintained (free from
		Supervisor		spiders)

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Date	Practice Drill Completed	Type of Drill	Rating 1-5 on Effectiveness	Comment
				Materials used in spills response from kit are listed to ensure re-stocking.
12/10/2016	12/10/16	Incident # 4, 7,8 Steven Kostiuk – Acting Site Supervisor Les Medbury – HSR Mark English – Fitter	4 Effective	Ensure Spills Kits are maintained (free from spiders) Regular inspections of maintenance areas and drains.
09/10/2017	09/10/2017	Incident # 4, 7,8 Shaun Jorgensen Site Manager Les Medbury- HSR Mark English- Fitter	4 Effective	Regular inspections of maintenance areas and drains. Ensure Spill Kits stock levels are maintained and clear access to Spill Kits at all times.
13/11/2018	13/11/2018	Incident #10 Shaun Jorgensen Luke Nunn Les Medbury Nathaniel Rae	4 Effective	Ensure water truck is used more frequently in dryer conditions. Employees to be made aware of all sprinkler shut off /turn on valves around site.
21/11/2019	21/11/2019	Incident #5 Shaun Jorgensen Les Medbury, Nathaniel Rae Steve Ilitch	4 Effective	Ensure water truck is in a fit for purpose use at all times
15/09/2020	15/09/2020	Incident # 4,7,8 Steve Ilitch-Leading hand Amanda Gregor- Data Operations Les Medbury- Safety officer	4 Effective	Ensure Spill Kits stock levels are maintained and clear access to Spill Kits at all times. Regular inspections of maintenance areas and drains.
1/11/2021	1/11/2021	Incident #5 Shaun Jorgensen	4 Effective	Ensure fire prevention kept clear from obstructions and in test date at all times. C

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Date	Practice Drill Completed	Type of Drill	Rating 1-5 on Effectiveness	Comment
		Steve Ilitch – Leading		
		hand		
		Rod Pratt – Fitter		
		Ben Nunn – App Fitter		
17/11/2022	15/09/2022	Shaun Jorgensen	4 Effective	
		Steve Ilitch		
		Ben Nunn		
		Rod Pratt		
28/9/2023	28/9/2023	Steve Ilitch	4 Effective	
		Ben Nunn		
		Robert Tudor		
13/11/2024	13/11/2024	Steve Ilitch	4 Effective	
		Shaun Jorgensen		
		Luke Nunn		
		Incident # 5		

# **Emergency Response Personnel Training**

Date	Names	Training Date	PIRMP Drill	Comment
07/10/2015	Shaun Jorgensen Les Medbury	07/10/15	07/10/15	
29/09/2016	Mark English Les Medbury Shaun Jorgensen Nathaniel Rae	29/09/16	12/10/16	Environmental Awareness Training was conducted by Greg Ninnes on the 29/09/16
09/10/2017	Shaun Jorgensen Paul Riley	09/10/2017	09/10/2017	
13/11/2018	Mark English	13/11/2018	13/11/2018	

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Date	Names	Training Date	PIRMP Drill	Comment
	Les Medbury,			
	Luke Nunn			
	Nathaniel Rae			
21/11/2019	Shaun Jorgensen	21/11/2019	21/11/2019	
	Les Medbury,			
	Nathaniel Rae			
	Steve Ilitch			
15/11/2020	Les Medbury	15/09/2020	15/09/2020	Online Training Environmental Management
	Amanda Gregor			Compliance, Obligations and Risk
	Steve Ilitch			Management.
1/11/2021	Shaun Jorgensen	1/11/2021	1/11/2021	
	Steve Ilitch			
	Ben Nunn			
	Rod Pratt			
25/10/2022	Shaun Jorgensen	25/10/2022	15/09/2022	Environmental Training Awareness training
	Steve Ilitch			and spills kit conducted by Attila Ballaz and
	Ben Nunn			Greg Ninness
	Rod Pratt			

#### **RISK ASSESSMENT MATRIX**

	TABLE 1: Measures of Consequence					
Value	Value Description Impact					
1	Incidental	No discernable impact or measurable impairment on habitat, species or natural environment (air, water, land).				
2	Minor	Localised and measurable short term impact on habitat, species or natural environment.				
3	Moderate	Localised and measurable medium term impact on habitat, species or natural environment.				
4	Major	Extensive and measurable medium term impact on habitat, species, or natural environment.				

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Severe

5

	TABLE 2: Qualitative measurement of how likely or probable the consequence will occur					
Level Likelihood Description						
1	Rare	The consequence is not expected in Pentarch/ Has never been heard of in the Industry.				
2	Unlikely	The consequence is possible in Pentarch/ Has occurred in the Industry.				
3	Possible	The consequence is possible at a Pentarch workplace at some time in the foreseeable future (next 10 years) / Has happened at Pentarch in past 10 years / Occurs annually within the Industry.				
4	Likely	The event is expected at a site/local level in the foreseeable future (next few years) / Occurs within Pentarch more than once per year.				
5	Almost Certain	The event is expected to occur several times a year at a site/local level.				

Destruction of important populations of habitat, species, or natural environment.

	TABLE 3: Qualitative Risk Matrix – Levels of Risk							
Consequence Likelihood	Incidental (1)	Minor (2)	Moderate (3)	Major (4)	Severe (5)			
Almost Certain (5)	M (8)	H (14)	E (20)	E (22)	E (25)			
Likely (4)	M (7)	M (10)	H (16)	E (21)	E (24)			
Possible (3)	L (3)	M (9)	H (15)	H (18)	E (23)			
Unlikely (2)	L (2)	L (5)	M (11)	H (17)	Н (19)			
Rare (1)	L (1)	L (4)	L (6)	M (12)	M (13)			

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#### **RISK ASSESSMENT on POTENTIAL IMPACTS**

	Hazard and Likelihood Risk Assessment and Corrective Control Measures								
Narooma				-	Responsible Person Review Date SCH Operations Manager 15th September 2023				
Name of pollutant/c hemicals	Description of Hazard / Incident leading to hazard	Consequence	Likely hood	Risk	Impact on Neigh- bours <sup>2</sup>	Control Measures Corrective Action  Responsible Person Revie		Next Review Date	
Diesel	Incident #1 Catastrophic failure of one/both above ground tanks	1	2	L2	N/A	Consequence: (incidental): Failure resulting in loss of all or substantial volume of tanks would be captured entirely by existing primary bund with no release to soil or water.  Likelihood: (unlikely): Due to location within bund, damage to tanks is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity with low risk of failure through corrosion.		As per PIRMP action plan	15/09/24
	Incident #2 Loss of diesel outside bund during refuelling/fuelling operations.	1	3	L3	N/A	Consequence: (incidental): Failure results or re-fuelling from hose, nozzle or plants by a secondary bund or spill kill with multikelihood: (possible): Due to location re-fuelling and fuelling is likely to occur refuelling equipment are maintained with the spilling equipment equipment are maintained with the spilling equipment	t/equipment would be captured inimal release to soil. within the bund an incident while on some occasions. Hoses and	As per PIRMP action plan	15/09/24

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<sup>&</sup>lt;sup>2</sup> If the incident may impact on neighbours then it will need to trigger the early warnings assessment and actions



## PENTARCH FORESTRY NAROOMA

#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

	Incident #3 Loss of fuel within bunded area with leaking or open drain valve	1	2	L2	N/A	Consequence: (incidental): Failure resulting in loss of all or substantial volume of tanks would be captured entirely by primary bund with minimal release to soil.  Likelihood: (unlikely): Drain valve, hoses and refuelling equipment are maintained in good structural integrity with low risk of failure The drain valve is locked at all times.	As per PIRMP action plan	15/09/24
Oils/ Solvents	Incident #4 Loss of oils solvents inside bund during delivery and or use	1	2	L2	N/A	Consequence: (incidental): Failure resulting in loss of oils/solvents from packaged goods would be captured entirely by existing primary bund with no release to soil or water.  Likelihood: (unlikely): Due to location within the bund, spillage during delivery and use is unlikely to occur. In addition hoses and decanting equipment are maintained in good structural integrity with low risk of failure.	As per PIRMP action plan	15/09/24
Log, Wood chip & Residue stockpiles	Incident #5. Spontaneous combustion or ignited fire	2	2	L5	Y	Consequence: (minor): Fire from stock piles or internal mill works causing loss off assets creating substantial smoke around the area.  Likelihood: (unlikely): Stockpiles are maintained to a manageable level along with emergency equipment inspected on a monthly basis. Hot works SWMS and permits utilised to eliminate potential risks.	As per PIRMP action plan	15/09/24
Dams 1-3	Incident #6 Catastrophic failure of one or more tannin dams releasing large volumes of tannin water into on-site and off-site water courses (i.e. creek).	2	2	L5	N/A	Consequence: (minor): Catastrophic failure of one or more sediment dams are likely to result in off-site impacts to water courses which would predominantly reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be significant.  Likelihood: (unlikely): Dams are frequently monitored and inspected for levels and integrity.  Risk Assessment = Moderate Vs Unlikely = L (2)  Note: For PIRMP purposes overflow events during extreme wet weather will be reported under POEO Licence obligations and not Immediate Reporting.	As per PIRMP action plan	15/09/24
Mobile Plant	Incident #7	1	2	L2	N	Consequence: (incidental): Failure from fuel tank or hydraulic hoses would be maintain to a small localised area on site.	As per PIRMP action plan	15/09/24

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#### PENTARCH FORESTRY NAROOMA POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

pollutants off site

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Monitoring

#### Likelihood: (unlikely): Hose or fuel tank failure from mobile plant would Mobile plant, hydraulic hose or be minimal as prestart and regular maintenance programs are in place fuel tank failure to capture and prevent such occurrences. Spills kits also maintain and available in various areas. Remediator – bio remediation of soils. Consequence: (incidental): Failure from fuel tank or hydraulic hoses 2 15/09/24 Mobile Incident #8 1 12 As per **PIRMP** would be maintain to a small localised area on site. plant/ Mobile plant, Contractor. hydraulic hose or Likelihood: (unlikely): Hose or fuel tank failure from mobile plant would action plan be minimal as prestart and regular maintenance programs are in place Visitor fuel tank failure to capture and prevent such occurrences. Spills kits also maintain and available in various areas. Inductions for all contractors demonstrating their accountabilities and responsibilities for reporting environmental incidents. Remediator – bio remediation of soils. Consequence: (incidental): Failure from fuel tank or hydraulic hoses 15/09/24 Car Park Incident #9 1 2 12 Ν As per Ruptured fuel tank would be maintain to a small localised area on site. PIRMP Likelihood: (unlikely): Hose or fuel tank failure from mobile plant would action plan be minimal as prestart and regular maintenance programs are in place to capture and prevent such occurrences. Spills kits also maintain and available in various areas Consequence: (incidental): Dust created form continuous mobile plant Incident # 10 2 12 15/09/24 Traffic 1 γ As per Surface dust from **PIRMP** areas operations across site Likelihood: (unlikely): Main areas watered with fire hoses in high wind (dust) mobile plant action plan conditions Incident #11 3 2 Υ Consequence: (moderate) Contamination of local waterways or ground 15/09/24 M11 Ground As per Migration of PIRMP Water water aquifers Likelihood: (unlikely) Annual ground water monitoring program

implemented

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action plan



#### PIRMP ACTION PLAN

#### **Incident No 1**

Incident No 1	Catastrophic failure of one/both diesel tanks.
	Actions Required (by Shaun Jorgensen and PIRMP Team):
	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
	Ensure bunds are capturing full volume of diesel
	Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)
	Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents
	Area to be restricted to Emergency Response Personnel
	Ensure spill kit available for any release from bund
	If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and
	remediate contamination.
	Repair/replace tanks
	Refuel tanks
	Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen staff)
	Spill Kit manager (Emergency Response Personnel)
	Periodic inspections and update reporting of site and bund (Shaun Jorgensen)
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact, however, potential for bund overflow or failure
	may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager
	Greg Ninness HSE Manager
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A

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Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Incident No 2	Loss of Fuel due to filling and refueling from one/both diesel tanks.
	Actions Required (by Shaun Jorgensen and PIRMP Team):
	<ul> <li>Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)</li> </ul>
	Ensure bunds are capturing full volume of diesel
	<ul> <li>Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)</li> </ul>
	<ul> <li>Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents</li> </ul>
	Area to be restricted to Emergency Response Personnel
	Ensure spill kit available for any release from bund
	If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and
	remediate contamination.
	Repair/replace tanks
	Refuel tanks
	Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	Spill Kit manager (Emergency Response Personnel)
	<ul> <li>Periodic inspections and update reporting of site and bund (Shaun Jorgensen)</li> </ul>
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure
	may result in soil and surface water contamination that will require specialist investigation/remediation.

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Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager
	Greg Ninness HSE Manager
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Incident No 3	Failure of drain valve on bund
	Actions Required (by Shaun Jorgensen and PIRMP Team)
	<ul> <li>Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)</li> </ul>
	Ensure bunds are capturing full volume of diesel
	<ul> <li>Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)</li> </ul>
	<ul> <li>Contact service provider (Caltex No. 1800033111 or Transpacific 02 96007185) to pump-out bund contents</li> </ul>
	Area to be restricted to Emergency Response Personnel
	Ensure spill kit available for any release from bund
	<ul> <li>If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination.</li> </ul>
	Repair/replace tanks
	Refuel tanks

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FORESTRY

# PENTARCH FORESTRY NAROOMA

#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

	Inspect hund for engaing conviceability
	Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	Spill Kit manager (Emergency Response Personnel)
	Periodic inspections and update reporting of site and bund (Shaun Jorgensen)
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure
	may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager
	Greg Ninness
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management

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#### **Incident No 4**

Incident No 4	Loss off oil/solvents, packaged goods
incident NO 4	Actions Required (by Shaun Jorgensen and PIRMP Team):
	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
	Ensure bunds are capturing full volume of oil/solvents
	Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)
	Contact service provider (Caltex No. 1800033111or Transpacific 02 96007185) to pump-out bund contents
	Area to be restricted to Emergency Response Personnel
	Ensure spill kit available for any release from bund
	<ul> <li>If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination.</li> </ul>
	Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	Spill Kit manager (Emergency Response Personnel)
	Periodic inspections and update reporting of site and bund (Shaun Jorgensen)
Scale of incident	Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure
	may result in soil and surface water contamination that will require specialist investigation/remediation.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager
	Greg Ninness
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	

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Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Fire in stockpiles of Logs, woodchip and waste residue. Fire in Mill or buildings including workshop.
Actions Required (by Shaun Jorgensen and PIRMP Team)
Contact all relevant people/departments (refer to Immediate Reporting Contact Sheet)
Area to be restricted to Emergency Response Personnel
Environmental Consultants to be engaged to investigate and remediate contamination if required
Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Shaun Jorgensen (reporting to Greg Ninness)
Call Emergencies services
Periodic inspections and update reporting of site (Shaun Jorgensen)
Incident would be restricted to chemical storage area with minimal external impact. However, potential for bund overflow or failure
may result in soil and surface water contamination that will require specialist investigation/remediation.
Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
notification.
Internal:
Operations Manager
Greg Ninness
External mandatory:
Immediate Reporting Contact Sheet to be used
External non-mandatory: N/A
As per Site Emergency Plan or Fire Department as part of Immediate Reporting

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Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Incident No 6	Failure of one or more tannin dams
	Actions Required Actions Required (by Shaun Jorgensen and PIRMP Team)
	<ul> <li>Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)</li> </ul>
	<ul> <li>Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)</li> </ul>
	<ul> <li>Contact local neigbours if going to be in inundated by rise of water</li> </ul>
	<ul> <li>Area to be restricted to Emergency Response Personnel</li> </ul>
	<ul> <li>If any release from site onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and</li> </ul>
	remediate contamination if any
	Contact local contractor to rebuild dams immediately
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	<ul> <li>Periodic inspections and update reporting of site (Shaun Jorgensen)</li> </ul>
Scale of incident	Catastrophic failure of one or more tannin dams are likely to result in off-site impacts to water courses which would predominantly
	reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be
	significant.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager
	Greg Ninness
	External mandatory:
	Immediate Reporting Contact Sheet to be used

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	External non-mandatory: N/A
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Clean up and Waste disposal	Consultants to be contacted to advice on required clean-up.
Reporting and re-preparedness	See SOPs:  • Incident Management (SOP GRP-OHS-052)

Incident No 7	Mobile plant, hydraulic hose or fuel tank failure
	Actions Required:
	<ul> <li>Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)</li> </ul>
	Area to be restricted to Emergency Response Personnel
	<ul> <li>Ensure spill kit available for any release from mobile plant &amp; equipment in general operational areas</li> </ul>
	In the event that any losses/leaks occur near the creek, containment or diversion structures are to be constructed by on site
	loader using soil/sand/ or other suitable material to prevent migration to the creek
	<ul> <li>If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately</li> </ul>
	Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	Spill Kit manager (Emergency Response Personnel)
Scale of incident	Incident would be localized to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager

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	Greg Ninness
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Incident No 8	Mobile plant, hydraulic hose or fuel tank failure from contractors / visitors
	Actions Required (by Shaun Jorgensen and PIRMP Team)
	Contractor/Visitor to notify site representative of issue immediately. (induction)
	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
	Area to be restricted to Emergency Response Personnel
	<ul> <li>Ensure spill kit available for any release from mobile plant &amp; equipment in general operational areas</li> </ul>
	If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately
	Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Call service provider (Shaun Jorgensen)
	Spill Kit manager (Emergency Response Personnel)
Scale of incident	Incident would be localized to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:

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	Operations Manager
	Greg Ninness
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
Aid	
Clean up and	Service Provider to dispose of contaminates.
Waste disposal	
Reporting and	See SOPs:
re-preparedness	Incident Management (SOP GRP-OHS-052)

Incident No 9	Car Park/ fuel tank failure
	Actions Required (by Shaun Jorgensen and PIRMP Team)
	Contractor/Visitor to notify site representative of issue immediately. (induction)
	Area to be restricted to Incident Response Personnel
	Ensure spill kit available for any release from mobile plant
	If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately
	Call service provider to inspect plant & equipment
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Shaun Jorgensen (reporting to Greg Ninness)
Controller	Spill Kit manager (Emergency Response Personnel)
Scale of incident	Incident would be localized to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate
	notification.
Communications	Internal:
	Operations Manager

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Reporting and re-preparedness	See SOPs:  • Incident Management (SOP GRP-OHS-052)
Waste disposal	
Clean up and	Service Provider to dispose of contaminate
Aid	
Rescue + First	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
safety checks	
respondent +	
Rescuer /	As per Site Emergency Plan or Fire Department as part of Immediate Reporting
	External non-mandatory: N/A
	Immediate Reporting Contact Sheet to be used
	External mandatory:
	Greg Ninness

Incident No 10	Dust from traffic areas	
	Actions Required:	
	Employees, Contractor/Visitor to notify site representative of issue immediately. (induction)	
	Daily monitoring to be undertaken to capture whether and site conditions	
	<ul> <li>Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)</li> </ul>	
	Dust suppression activity to commence immediately on unsealed roads	
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.	
Emergency	Shaun Jorgensen (reporting to Greg Ninness)	
Controller	Site Supervisor to instruct site personnel (Shaun Jorgensen)	
Scale of incident	Incident would be localized to the area with no external impact.	
Evacuate	Only if fire or potential exists. Site Supervisor and any advice provided by Fire Dept as part of attendance after immediate	
	notification.	
Communications	Internal:	
	Operations Manager	
	External mandatory:	
	Immediate Reporting Contact Sheet to be used if required	

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	External non-mandatory: N/A	
Rescuer / respondent + safety checks	As per Site Emergency Plan or Fire Department as part of Immediate Reporting	
Rescue + First Aid	As per Site Emergency Plan or Fire Department as part of Immediate Reporting	
Clean up and Waste disposal	N/A	
Reporting and re-preparedness	See SOPs:  • N/A	

Incident No 11	Ongoing Ground Water Monitoring (12 monthly)
Alarm raising	If ground water monitoring results indicate potential migration off site, National Environmental Manager to be informed.
Emergency Controller	Shaun Jorgensen (reporting to Greg Ninness)
Scale of incident	Groundwater results to be reviewed by National Environmental Manager for any further action/notification.
Evacuate	N/A
Communications	Internal:      Operations Manager  External mandatory:      Immediate Reporting Contact Sheet to be used if required  External non-mandatory: N/A
Rescuer / respondent + safety checks	N/A
Rescue + First Aid	N/A
Clean up and Waste disposal	National Environmental Manager to advise

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#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Reporting and	•	National
re-preparedness		

al Environmental Manager to advise

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#### **PIRMP Audit**

The objectives of an audit are to maintain compliance with this plan. Internal audits of this Plan will be undertaken every 3 years.

Routine testing of the plan will be conducted annually, and can be completed through the following methods:

- Simulated environmental emergency, or
- Desktop simulations.

#### **PIRMP Review**

Review date: 14/11/2024

Pentarch Forestry Narooma will review this management plan routinely every 12 months. The Plan review will include:

- This Document, and
- Legislation, Approval and Licence changes.

Events which may trigger a review of this Plan, or its associated documents include:

- Within 1 month of reporting to the nominated parties in accordance with the plan, after a pollution incident, or
- Modification/Improvement to the system

Revisions are to be coordinated by the Site Supervisor and Environmental Representative. The objectives of a review are:

- To maintain compliance with the statutory requirements, and
- To identify opportunities for improvement in the Plan, and reduce the risk to human health and the environment

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#### PENTARCH FORESTRY NAROOMA POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

PENTARCH FORESTRY PIRMP NOTIFICATION/ PROCEDURE RECORD SHEET		
SITE DETAILS		
Site Name	Site Address	Responsible Person

#### **Notification Procedure**

- Incident to be communicate to Greg Ninness immediately (0401895073)
- **GN** will consider if incidents requires EPA notification
- If NOT site supervisor to provide periodic updates of incident status to GN for evaluation on weather EPA or other parties will need to be notified
- If Yes GN to call necessary parties of incident and communicate response back to site, GN to receive and provide updates to necessary parties

For the coordination of emergency response teams refer to site emergency procedures.

GOVERNMENT AGENCY CONTACT LIST  (document date and time of contact and who contacted) (Police contact is only required if considered necessary)		
EPA Contact: 131 555	Fire Brigades Contact: 000	Work Cover Contact:
Date and Time: Person making contact: Instructed Actions:	Date and Time: Person making contact: Instructed Actions	Date and Time: Person making contact: Instructed Actions:
Time of arrival	Time of arrival	Time of arrival

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#### PENTARCH FORESTRY NAROOMA

#### POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Local Government Contact: After Hours emergency	Department of Health Contact:Base Hospital Public Health Unit	Local Police Contact:  Date and Time:
Date and Time: Person making contact: Instructed Actions:	Environmental Health: 149 377  Date and Time: Person making contact: Instructed Actions:	Person making contact: Instructed Actions:
Time of arrival	Time of arrival	Time of arrival

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# PENTARCH FORESTRY NAROOMA POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

INCIDENT DETAILS		
Location of Incident:	Emission Type (air, water, land etc.):	Scale of the incident (litres/ m³ involved):
Date and Time of the Incident:	Internal Persons involved:	
Chemicals /substances involved		
Process Involved		
Details of the incident		
Details of the incluent		
Main Areas/ sensitive areas of concern e.g. w	ater courses, drains etc.	

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#### PENTARCH FORESTRY NAROOMA POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

OTHER CONTACTS IF REQUIRED Y/N		
Community Group Contact	Neighbor 1	Neighbor 2
Date and Time:	Date and Time:	Date and Time:
Person making contact:	Person making contact:	Person making contact:
Contact method:	Contact method:	Contact method:
Neighbor 3:	Neighbor 4	Neighbor 5
Date and Time:	Date and Time:	Date and Time:
Person making contact:	Person making contact:	Person making contact:
Contact method:	Contact method:	Contact method:

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### Protocol for industry notification of pollution incidents

Extract from www.environment.nsw.gov.au website

Recent changes to Part 5.7 of the *Protection of the Environment Operations Act 1997* (POEO Act) specify new requirements relating to the notification of pollution incidents.

The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- the appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) the local authority is a local council of an area under the Local Government Act 1993), the Lord Howe Island Board for Lord Howe Island, or the Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council)
- the EPA, if it is not the ARA phone Environment Line on 131 555
- the Ministry of Health via the local Public Health Unit see <a href="https://www.health.nsw.gov.au/publichealth/infectious/phus.asp">www.health.nsw.gov.au/publichealth/infectious/phus.asp</a>
- the Work Cover Authority phone 13 10 50
- the local authority if this is not the ARA
- Fire and Rescue NSW phone 000.

The appropriate contact for the relevant local authority and Public Health Unit will vary. All necessary contact numbers should be found in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers should also be identified in the Pollution Incident Response Management Plan prepared for the premises.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by Work Cover.

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