



PENTARCH
INDUSTRIAL

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

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Pollution Incident Response Management Plan

1. Description and Intended Use

1.1. Overview

The Pollution Incident Response Management Plan (PIRMP) defines how a pollution incident is to be managed on site at Oaklands in order to satisfy the objectives set out by the Environmental Protection Authority (EPA).

1.2. Objectives

They key objectives are to:

- ❖ Ensure comprehensive and timely communication about a pollution incident to staff on site;
- ❖ Ensure comprehensive and timely communication about a pollution incident to relevant authorities and people outside the facility who may be affected by the impacts of a pollution incident; and
- ❖ Ensure the plan is properly implemented and tested for accuracy, currency and suitability.

1.3. Criteria

The PIRMP has been developed to meet the criteria set out in the ***Environmental Guidelines: Preparation of Pollution Incident Response Management Plans (Guide)***, specifically the legislative requirements set out in:

- ❖ Part 5.7A of the Protection of the Environment Operations Act 1997; and
- ❖ Protection of the Environment Operations (General) Regulation 2009.

1.4. Definition of Pollution Incident

The definition of a pollution incident as set out in the Environmental Guidelines is:

“...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.”

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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:

(a) harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(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

(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."

1.5. Pentarch Activities

The Main Activities conducted within the licenced site, include demilitarisation of redundant ammunition stock. The Demilitarisation includes:

- ❖ Physical breakdown of the ammunition
- ❖ Mechanical processing of the energetic components (functioning) with emission capture and treatment eg HEPA Filtration.
- ❖ Thermal treatment of the energetic components with after burner or wet scrubbing or a combination of pollution controls.

2. Document management and availability

2.1. Document Control

The PIRMP shall be managed in accordance with ISO 9001:2008 and the Pentarch Quality Management System, as set out in 01-QP-001 Quality Manual, and the Management Procedures set out in 01-MP-005 Document and Data Control..

2.2. External Access

For reference by external parties the PIRMP and supporting documentation listed in below, shall be published on the Pentarch Website and may be found using the following pathway:

http://www.pentarch.com.au/pentarch_industrial/accreditations.html

Supporting documents to be made available, in PDF Format, on the website include:

- 04-CD-P03 Emergency Procedures
- 04-CD-P04 Emergency Assembly Area Plan
- 04-CD-P06 EP Checklist
- 04-CD-P09 HAZMAT Requirements
- 04-CD-P10 Emergency Contacts

Other supporting documents may be made available to the EPA upon request and to members of the public upon application and approval by the General Manager.

3. Inter-relationships

The PIRMP inter-relates with the following documents and procedures:

3.1. Management Procedures

- ❖ 01-MP-014 RISK MANAGEMENT FRAMEWORK AND PROCEDURE
- ❖ 04-MP-001 STAFF INDUCTION
- ❖ 04-MP-002 CONTRACTOR INDUCTION
- ❖ 04-MP-003 VISITOR INDUCTION
- ❖ 05-MP-001 SITE WORK HEALTH & SAFETY

3.2. Company Policies

- ❖ 07-CD-003 OHS POLICY
- ❖ 07-CD-004 ENVIRONMENTAL POLICY
- ❖ 07-CD-005 DANGEROUS GOODS POLICY

3.3. Emergency Procedures and supporting references

- ❖ 04-CD-P03 EMERGENCY PROCEDURES
- ❖ 04-CD-P04 EMERGENCY ASSEMBLY AREA PLAN
- ❖ 04-CD-P06 EP CHECKLIST
- ❖ 05-CD-P04 EMERGENCY CONTACTS
- ❖ 04-CD-P09 HAZMAT REQUIREMENTS

3.4. Risk Assessment

- ❖ 05-CD-003 OHS&E GUIDELINE TO THE ASSESSMENT OF RISK
- ❖ 05-CD-004 OHS&E HAZARD IDENTIFICATION GUIDE

4. Policy and Objectives

4.1. Environmental Policy

The Pentarch Environmental Policy (07-CD-004) was developed as a statement of commitment from senior management and reflects the values and commitment of the organisation. The policy is reviewed every 2 years by the management for its appropriateness and legitimacy.

4.2. Environmental Objectives

Pentarch has set the following environmental objectives:

- ❖ Implement best environmental practice in the areas of demilitarization of redundant stock and munitions.
- ❖ Take a risk management view of all significant environmental impacts so that environmental harm is minimised
- ❖ Ensure all significant environmental risks are assessed and recorded in the Pentarch risk register. (Reference 05-R-P03)
- ❖ Ensure the Risk Register is revised regularly to ensure risks are adequately monitored and managed.
- ❖ Ensure there are no licence breaches on any of our licenced conditions.
- ❖ Ensure waste streams are managed commercially such that the principles of reduce, reuse and recycle are applied and returns are both good for business and the environment.
- ❖ Preserve flora and fauna diversity.

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5. Risk Management Organisation

5.1. Risk Management Responsibilities

The Risk Management organisation is consistent with the responsibilities of the individuals within the overall management structure ref: **01-CD-001 Company Structure**.

The following personnel have responsibilities with regards to all aspects of Risk as defined in this report:

Pentarch Director	<ul style="list-style-type: none"> ❖ Overall accountability and responsibility for business performance. ❖ Monitor environmental performance of the business. ❖ Ensure management decisions are made in a timely manner following system review. ❖ Make final approval of scope, budget and significant variations for significant projects.
General Manager	<ul style="list-style-type: none"> ❖ Resource allocation. ❖ Liaison with key stakeholders. ❖ Management of the operations, schedule, budget, scope, issues and risks. ❖ Ensure environmental risks are managed effectively. ❖ Ensure internal audit processes cover environmental areas.
Operations Manager	<ul style="list-style-type: none"> ❖ Managing production and project human resources. ❖ Ensure management procedures are implemented and followed at the site level. ❖ Report any non-conforming situations where there may be a significant environmental impact to the GM and regulatory authorities in a timely manner. ❖ Implement incident control procedures in the event of an environmental incident.
Staff	<ul style="list-style-type: none"> ❖ Follow processes and task work instructions and insure environmental risk controls are followed at the site level. ❖ Actively participate in environmental training initiatives. ❖ Report any non-conforming situations where there may be a significant environmental impact to the site supervisor in a timely manner. ❖ Forward any issues or opportunity for improvement suggestions on to the GM in a timely manner.

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5.2. Framework and Structure

Management of Risk (WHS&E) is in accordance with 01-MP-014 Risk Management Framework And Procedure and the Quality Management System (QMS). Further information and specific details can be found within the inter-related documents set out in section 3. The Risk management framework in diagram 1, illustrates the overall approach.

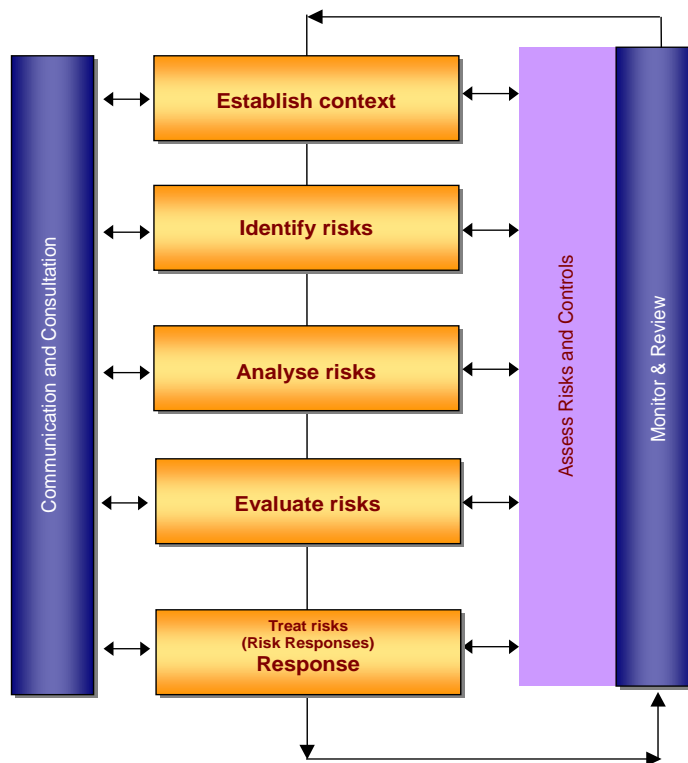


Diagram 1: Risk Management Framework

5.3. Pre-emptive Actions

Pentarch reviews its activities and services including planned and new developments to identify all risks, including environmental aspects. These are listed as risks within the Pentarch Risk Register.

Each identified environmental aspect is subject to a qualitative risk analysis based on likelihood and consequences of environmental impact or impact on the organisation from environment-related issues, in the context of existing measures to control the risk. Both positive and negative impacts can be considered.

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The process outlined in figure 1 is implemented as follows:

- ❖ A risk assessment is conducted to identify and assess risks
- ❖ The results are discussed at a management level in order to plan the elimination of risk, or the implementation of potential risk reduction or control measures.
- ❖ Risks are recorded in a Risk Register
- ❖ Control Measures are planned and recorded on the risk register and the Corrective action register.
- ❖ Implementation of control measures are monitored using the Corrective Action Register which is referenced at the Monthly Site Management Meetings.

The risk register (refer 05-R-P03 WHS&E Risk Register) contains all known OHS&E risks to the organisation including any risks that have an environmental aspect. This risk register is reviewed regularly to ensure risk ratings and control measures remain adequate for the organisation. The risk register is also reviewed in training to ensure operators are aware of the hazards, and current control measure.

5.4. Safety Equipment and MSDS

Safety equipment required to control or reduce risk, including precautionary equipment such as spill kits, which would be used in response to a pollution incident is identified and described as a Hazard Control Measure on the Risk Register.

Materials Safety Data sheets for chemicals, including product for disposal where applicable, and fuels are listed on the MSDS Index (ref 07-R-P05) and hardcopies are available for reference in the Site Office as well at storage locations where appropriate.

6. Inventory of Pollutants

Inventories of potential pollutants, are maintained and are available in an emergency or in response to a pollution incident to relevant authorities via the HAZMAT information located at the front gate of the site.

Inventories include:

11-R-001 Class 1 DG Holdings Summary
05-R-P01 Manifest of Hazardous Chemicals

A list of explosive items typically held on site is also included in the HATMAT information, and full inventories are maintained.

7. Communication and Training

7.1. Communication

Information about the organisation's environmental risks and controls is communicated among the levels and functions of the organisation through:

- ❖ Risk awareness training provided during induction and at refresher sessions.
- ❖ Provision of this plan and supporting documentation on the organisation's intranet.
- ❖ Provision of the bi-annual results of monitoring of the organisation's environmental performance for our licences on the organisation's internet site.
- ❖ General awareness of the PIRMP is promoted through staff induction training and staff awareness sessions, and is also referenced in the emergency drill de-brief. (Refer O4-CD-P03 Emergency Procedures section 4.5).

Communication received from external parties regarding the organisation's environmental management is managed in the same way as formal communication received by the organisation on all issues.

7.2. Training

Pentarch will identify environmental training activities and monitor progress through the Oaklands Training Register & Schedule (reference O6-R-P01). Training requirements for roles which have responsibility for an activity that has the potential to cause a significant environmental impact are also included in relevant work instructions.

For each person a training needs analysis is completed periodically, usually when they commence a role and as part of an annual review.

8. Incident response

8.1. Actions to be taken

In the event of an environmental incident as described in section 1.4 refer to the **Emergency Procedures (04-CD-P03)**, which includes notification procedures.

When it is safe to do so the Operations Manager and Site manager shall assess the pollution incident to establish the following:

- ❖ What is the contaminant?
- ❖ What action is required to control and minimise further environmental damage?
- ❖ What resources are required? (contractors or equipment)
- ❖ What authorities should be notified?

Based on this assessment, and where appropriate in consultation with the Director and or General Manager, a plan to control the pollution incident as quickly and effectively as possible is implemented in order to minimize any further environmental impact or emission.

Specific considerations:

- ❖ Deployment of spill containment equipment
- ❖ Activation of stormwater shut off valves
- ❖ Shutdown of processes or equipment

8.2. Mandatory Notification

The POEO Act 1997 requires immediate communication of pollution incidents at a licenced premise to the following authorities:

- ❖ Environment Protection Authority (EPA)
- ❖ NSW Health
- ❖ Fire and Rescue NSW
- ❖ Workcover NSW,
- ❖ Urana Council,

The contact numbers of each of the above authorities are provided as part of the **Emergency Contacts ref 04-CD-P10**. In the event of a notifiable pollution incident, management shall ensure contact is made with the above listed authorities as soon as practicable.

8.3. Communication with Neighbours and the Local Community

Where a pollution incident is seen to pose any potential threat, or actual threat to neighbouring properties the Operations Manager or delegate shall make contact by phone to explain the situation and the possible consequences, and well as any precautions which may minimise the risk of harm caused by a pollution incident.

The contact telephone numbers are listed on the **Emergency Contact list(ref 04-CD-P10)**.

The potential pollution incidents, assessed as “likely to occur” shall be set out in the **Risk Register (ref 05-R-P03)**, and the control measures, including any instruction to the occupants of neighbouring properties are described.

8.4. Incident Investigation

Following any incident, including a pollution incident, an incident report is completed (refer 05-RT-001). This includes a root cause analysis and corrective action planning. The incident reports are assessed by management and progress with regard to the implementation of corrective actions is monitored

9. Testing the PIRMP

9.1. Emergency Drills

Emergency Drills are scheduled every six months, and the PIRMP shall be considered in each of these drills. Refer to the **Emergency Procedures 04-CD-P03**, section 4.5 for further detail regarding Emergency Drills, records required and follow actions. Investigations into any incident on site are conducted as soon as practicable.

9.2. Internal Audit

The PIRMP shall be subject to internal audits in accordance with ISO9001:2008. In addition to the scheduled audits, internal audits will be carried out within one month of any pollution incident occurring.

9.3. Management Review

Senior management of the organisation will monitor the environmental management and incident response plan for its continuing suitability, adequacy and effectiveness. Each management review makes decisions on changes to environmental policy, the risk assessment procedure, the risk register and the organisation's environmental management and incident response plan.