POLLUTION INCIDENT RESPONSE

MANAGEMENT PLAN
(PIRMP)

CASTLE MOUNTAIN ZEOLITES
EPL : 7511
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1 OVERVIEW

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009.

The site is situated:

1165 Wallabadah Road, Quirindi NSW 2343
ML 1395 PSH Quirindi
Nearest crossroad – Callaghan’s Lane and Wallabadah Road

Under the legislation referred to above, the EPL also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

1. **Background** – describes main features of the regulation
2. **Hazard, likelihood and pre-emptive actions to prevent pollution incident risks** – describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
3. **Maps** – map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures** – what to do in case of material harm
5. **Early warnings and communication to neighbours** – when to contact neighbours in case of pollution incidents and info required for website
6. **Training** – information to be passed on to staff and contractors
7. **Updating of plan** – frequency of updates
8. **Testing** – frequency of drills to test effectiveness of PIRMP
9. **Implementing of plan** – reference to legislation requirement to carry out aspects of the plan during a pollution incident

Introduction

The Castle Mountain Zeolites site is licensed to Castle Mountain Enterprises Pty Ltd

This site is covered by an Environment Protection Licence (EPL) number 7511 for the scheduled activities:

Open cut extraction of natural Zeolite mineral ore, via blasting and excavation and final processing via a range of crushing equipment. Product is then packaged and stored on-site for despatch via road transport to our clients.

The site has an overarching environmental management system supported by Castle Mountain Zeolites Mine Safety Management Plan
Purpose

The purpose of this PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community over the life of the quarry.

The purpose of this plan is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.

- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks.

- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

Scope

This PIRMP is for the use of all Castle Mountain Zeolites workers and Castle Mountain Zeolites contractors undertaking works on the site. The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur.

The Castle Mountain Zeolites site is located at [site location] and holds EPL number 7511. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of Castle Mountain Zeolites workers to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2010.

Responsibilities

All Castle Mountain Zeolites staff and contractors

- Reporting of any incidents
- Ensure they understand and work to the health and safety practices and procedures and wear appropriate personal protective equipment
- Identity and Implement PIRMP as required

Castle Mountain Zeolites Managers and Supervisors

- PPE is supplied
- Ensuring their staff are aware of PIRMP
- Training of staff as to implementation of the PIRMP
Environment department, WHS and Management is responsible for acting in good faith in:

- assisting with advice, reporting and response process;
- ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act
- giving advice on whether environmental incidents need to be reported to external agencies
- assisting in the notification of pollution incidents to the relevant authorities
- provision of maps associated with the plan
- assistance with the implementation of response actions to pollution incidents
- assistance in communications with neighbours and the local community about the Plan and when incidents of a certain nature occur
- ensuring that training responsible for activating about their roles in the Plan
- testing
- reviewing the plan.

**Documentation**

The environmental incident register – Hazard and Likelihood Risk Assessment Table 1

<table>
<thead>
<tr>
<th>Name/Reference Of pollutant/ Chemical</th>
<th>Description of Hazard/Incident leading to Hazard</th>
<th>level of Impact</th>
<th>Likelihood</th>
<th>Priority (code)</th>
<th>Impact on Neighbours</th>
<th>Potential for Material Harm</th>
<th>Engage PRIMP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sediment</td>
<td>overtopping of sediment into downstream environment after heavy rain</td>
<td>L</td>
<td>Unlikely</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Fuel</td>
<td>spill of fuel contaminating groundwater or surface water from trucks &amp; plant</td>
<td>L</td>
<td>Unlikely</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>Oils</td>
<td>spill of oil contaminating groundwater or surface water from trucks &amp; plant</td>
<td>L</td>
<td>Unlikely</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>Dust</td>
<td>airborne dust blowing into neighbouring property</td>
<td>L</td>
<td>Unlikely</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>LP Gas</td>
<td>Leakage</td>
<td>L</td>
<td>Unlikely</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td></td>
</tr>
</tbody>
</table>

Environmental Incident Register is used to record and monitor all environmental incidents within Castle Mountain Zeolites. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the PCBU of Castle Mountain Zeolites.
The Environment Manager or in this case the PCBU is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

Environment Incident Register – Castle Mountain Zeolites

Table 2 – e.g.

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Name of Pollutant</th>
<th>Description</th>
<th>Outcome</th>
<th>Actioned by</th>
<th>Date</th>
</tr>
</thead>
</table>
2 EVALUATION

This Pollution incident Response management Plan complies with the requirements under the:

- **POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans**
- **POEO (General) Regulation 2009 Part 3A**

The requirements under the legislation are supported by the *Environmental Guidelines: Preparation of pollution incident response management plans*, which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licences (EPLs). Castle Mountain Zeolites operates under EPL no. 7511 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas which this Plan covers are described in table 1 PIRMP Requirements.

**TABLE 1**

<table>
<thead>
<tr>
<th>PIRMP Legislation covered under this Plan</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>POEO Act Part 5.7</strong></td>
<td></td>
</tr>
<tr>
<td>153A Duty of licence holder to prepare pollution incident response management plan</td>
<td>Whole document plus references</td>
</tr>
<tr>
<td>153C Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities</td>
<td>5 + references</td>
</tr>
<tr>
<td>153D Keeping of plan:</td>
<td>6.3-7</td>
</tr>
<tr>
<td>153E Testing of plan:</td>
<td>8</td>
</tr>
<tr>
<td>153F Implementation of plan:</td>
<td>9</td>
</tr>
<tr>
<td><strong>POEO (General) Regulation 2009</strong></td>
<td></td>
</tr>
<tr>
<td>98C(g) Staff Contacts:</td>
<td>5.1.1</td>
</tr>
<tr>
<td>98C(h) Authority Contact:</td>
<td>5.1.1 + 6.2 + references</td>
</tr>
<tr>
<td>98C(i) Early Warnings Neighbours:</td>
<td>6</td>
</tr>
<tr>
<td>98C(j) Staff Safety:</td>
<td>3.4</td>
</tr>
<tr>
<td>98C(k) Maps location of pollutants:</td>
<td>4</td>
</tr>
<tr>
<td>98C(l) Early Warnings General:</td>
<td>6.1</td>
</tr>
<tr>
<td>98C(m) Training of Staff:</td>
<td>6.3</td>
</tr>
<tr>
<td>98C(n) Timing of Testing:</td>
<td>8</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>98C(o)</td>
<td>Updating of Plan:</td>
</tr>
<tr>
<td>98C(p)</td>
<td>Plan Testing:</td>
</tr>
<tr>
<td>98D(1)</td>
<td>Availability of plan:</td>
</tr>
<tr>
<td>98D(2)</td>
<td>Publishing Plan Parts:</td>
</tr>
<tr>
<td>98D(3)</td>
<td>Procedures under Act:</td>
</tr>
<tr>
<td>98D(4)</td>
<td>Privacy Protection:</td>
</tr>
<tr>
<td>98E(1)</td>
<td>Testing of the Plan:</td>
</tr>
<tr>
<td>98E(2)</td>
<td>Minimum Testing requirements:</td>
</tr>
</tbody>
</table>
3 HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

3.1 Overview

This chapter deals with the POEO (General) Regulation 2009’s sections 98(a) to 98(f) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The site undertakes open cut extraction of natural zeolite mineral ore via blasting and excavation and final processing via a range of crushing equipment and bagging of the product.

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under Mine Safety Management Plan. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.

3.2 Summary of Pollution Types

Extraction of natural Zeolite mineral ore by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the Castle Mountain Zeolites.
Table 2: List of Typical Main Pollutants in extraction of natural zeolite mineral ore

<table>
<thead>
<tr>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air Based Emissions</strong></td>
<td></td>
</tr>
<tr>
<td>Dust</td>
<td>From processing plant, blasting. Dust is covered under this Plan and also</td>
</tr>
<tr>
<td>Fire</td>
<td>Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under the Mining Safety Plan Form 9A in conjunction with NSW Rural Fire Service</td>
</tr>
<tr>
<td>Noise</td>
<td>Emitted by plant and equipment. Covered under the hearing protection policy in Mine Management Plan - the wearing of ear plugs or ear muffs is compulsory in all areas with appropriate signage or where particular working conditions require it. Noise is not considered a pollution incident and not covered further under this Plan.</td>
</tr>
<tr>
<td>Odour</td>
<td>Odour is generally not associated with this site due to the nature of the mineral mine And the fact that zeolite is used at an odour absorbent in many industries</td>
</tr>
<tr>
<td>Class 3 flammable liquids e.g. Fuels including petrol based fuels and</td>
<td>For plant and equipment operations. MSDS sheets • Diesel storage drums are bunded under the guidelines storage of flammable liquids • Visible notification of hazard</td>
</tr>
<tr>
<td>Combustible Liquids (C1 &amp; C2) Lubricants and hydraulic oils and other</td>
<td>For plant and equipment operations. Covered under • MSDS sheets • Containerized</td>
</tr>
<tr>
<td>Other dangerous Goods classes e.g. • Compressed gases •</td>
<td>Use of other dangerous goods varies on site. Covered under • Gas cylinder is installed as per guidelines for LP gas storage</td>
</tr>
</tbody>
</table>

3.2.1 Use and Storage of Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous Chemicals — covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances

Hazardous chemicals are documented and itemized in accordance to the Workplace Health and Safety Regulation 2011. The specific hazardous and non-hazardous chemicals documents are identified in Table 3:
Table 3 Reference Documents to Inventory of Pollutants

<table>
<thead>
<tr>
<th>Document Name</th>
<th>Relation to this Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mine Safety Management Plan</td>
<td>Provides:</td>
</tr>
<tr>
<td></td>
<td>• Key contacts regarding OH&amp;S issues and incidents</td>
</tr>
<tr>
<td></td>
<td>• Hazardous chemicals register</td>
</tr>
<tr>
<td></td>
<td>• Storage and handling requirements</td>
</tr>
<tr>
<td></td>
<td>• Plant maintenance records</td>
</tr>
<tr>
<td></td>
<td>• Emergency procedures</td>
</tr>
<tr>
<td></td>
<td>• Training and record keeping</td>
</tr>
<tr>
<td></td>
<td>• Handling of hazardous materials and dangerous goods</td>
</tr>
<tr>
<td>MSDS list</td>
<td>All chemicals are accompanied by the relevant MSDS as required by work health &amp; safety regulations. The MSDS list is kept at the mine site and one in the Castle Mountain Zeolites office.</td>
</tr>
</tbody>
</table>

3.3 Risk assessment and Control Measures (pre-emptive actions)

3.3.1 Identification of Risk Areas
Assessment analysis and control measures to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents:
- EMS PIRMP
- WHS – Mine Safety Management Plan

Table 4 List of Documents Covering Environmental Risk Assessment and Control Measures

<table>
<thead>
<tr>
<th>Document Name</th>
<th>Relation to this Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mine Safety Management Plan</td>
<td>Provides:</td>
</tr>
<tr>
<td></td>
<td>• Key contacts regarding OH&amp;S issues and incidents</td>
</tr>
<tr>
<td></td>
<td>• Hazardous chemicals register</td>
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<td></td>
<td>• Storage and handling requirements</td>
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<tr>
<td></td>
<td>• Plant maintenance records</td>
</tr>
<tr>
<td></td>
<td>• Emergency procedures</td>
</tr>
<tr>
<td></td>
<td>• Training and record keeping</td>
</tr>
<tr>
<td></td>
<td>• Handling of hazardous materials and dangerous goods</td>
</tr>
<tr>
<td>Castle Mountain Zeolites PIRMP</td>
<td>Provides in relation to PIRMP requirements:</td>
</tr>
<tr>
<td></td>
<td>• Internal auditing of sites and requires Castle Mountain Zeolites sites to undertake or implement where reasonably practicable</td>
</tr>
<tr>
<td></td>
<td>• Aspects and Impacts assessment</td>
</tr>
<tr>
<td></td>
<td>• Maintenance activities</td>
</tr>
<tr>
<td></td>
<td>• Facility management</td>
</tr>
<tr>
<td></td>
<td>• Emergency response and incident response</td>
</tr>
<tr>
<td></td>
<td>• Staff training and competencies</td>
</tr>
</tbody>
</table>
3.4 Risk Modules

To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation are covered in this section. This is undertaken by a process described in the following flowchart:

Main Activities:
- Hazardous Chemicals storage and use
- Non hazardous chemicals storage and use
- Aqueous management

Substance Listings (potential pollutants):
- Usage
- Storage

Basic Information:
- Hazard Chemical
- (Dangerous Good?)
- Max Quantity on site
- Location description
- Map Reference

Human Impacts:
- Neighbours
- Staff/Contractors

Pre-emptive measures:
- Basic reference

Risk Assessment:
- Hazard identification
- Risk assessment
- More detailed control measures for specific hazard/incident
4 MAPS

This section covers the *POEO (General) Regulation s98E(k)* requirements which are:

A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.

Map 4.1 shows the geographic location of the Production Plant Facilities and includes the requirements above.

Map 4.2 shows the location of potentially affected neighbours

[As a suggestion if your site is not complex, an overlay of the above requirements on a google map can suffice. Due to the differences in scale generally 2 maps are required, one for the site and one for the local vicinity and potentially affected neighbours.]
Map 4.1 Geographic location of the Production Plant Facilities

CMZ Production Plant Facilities Plan

Aerial Photography NOV 2013
5 EMERGENCY INCIDENT RESPONSE PROCEDURES

5.1.1 Internal communications — key names and contacts

Should an incident occur on the premises, staff or contractors are required to notify the Operations Supervisor immediately who will notify the Mine operator. The mine operator is responsible for activating the PIRMP and managing the response. In the absence of the Manager the Supervisor may activate the PIRMP.
Names and contact numbers

Table: List of Key Jobs and 24 hour Contact Details

<table>
<thead>
<tr>
<th>Job title</th>
<th>Contact Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Manager – Gordon Heath</td>
<td>67463555 / 0428767007</td>
</tr>
<tr>
<td>Project Manager – Gordon Heath</td>
<td>67463555 / 0428767007</td>
</tr>
<tr>
<td>Operations Supervisor – Glen Auld</td>
<td>0427203083</td>
</tr>
<tr>
<td>Admin – Frances Heath</td>
<td>67463555</td>
</tr>
</tbody>
</table>

The POEO Act definition of a pollution incident is:

Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

POEO Act definition of "clean-up action", in relation to a pollution incident, includes:

(a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
(b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
(c) preparing and carrying out a remedial plan of action.
It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

- Spill kits should be available on site and restocked/replaced if used.
- Spill kits should be available at:
  - the production plant

Safety Gear

Use appropriate PPE before getting in close proximity to a chemical spill. PPE types to be used are identified on the MSDS.
For aqueous based spills, such as dam waters and materials from sediment basins or floods, general safety gear for site will be suitable.
Location of information

The Pollution Incident Response Management Plan will be located with other emergency documentation in the administration office and a copy on site. Following containment of the incident, immediate action must be taken to determine if the incident can be classified as a material harm incident – considered to be causing or threatening material harm. As defined by section 147 of the POEO Act.

5.2 External communications – government agencies and other parties

Under 5.7 of the POEO Act all five relevant authorities must be notified immediately. The mine manager is authorized

This is covered under:
- Fire and Rescue 000
- EPA 131555
- Ministry of Health (Tamworth) 02067648000 (ask for Public Health Officer on call)
- Work Cover 131050
- Liverpool Plains Shire Council 02 67461755 (24hrs)

After initial notification of any material harm incident, it will be the responsibility of the Mine Manager to liaise with any authority listed that may request additional information, or is providing directions for management of the material harm incident. This may include incident investigation reports and ongoing environmental monitoring results.
### Major incident Reporting Response

<table>
<thead>
<tr>
<th></th>
<th>[company name] Management Actions</th>
<th>Contractor Management Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.</strong></td>
<td>For major <strong>POLLUTION INCIDENTS immediately</strong> appoint an interim site controller. Gordon Heath will advise on choice of site controller. All Site Controllers are to consider advice provided and use this in decision making.</td>
<td>Site Management to appoint interim/temporary site controller.</td>
</tr>
<tr>
<td><strong>2.</strong></td>
<td>Arrival of more senior Castle Mountain Zeolites Environment or Safety Branch appointed Site Controller</td>
<td>Interim Site controller to hand over to Gordon Heath Site Controller and provide advice.</td>
</tr>
<tr>
<td><strong>3.</strong></td>
<td>Arrival of a combat agency – Fire and Rescue, EPA or Work Cover. Combat agencies to make clear who their Site Controller is. (A reported pollution incident will generally result in a combat agency arriving)</td>
<td>Site Controller to hand over to Combat agency Site Controller, assist provide advice and follow instructions.</td>
</tr>
<tr>
<td><strong>4.</strong></td>
<td>Advice to combat agency</td>
<td>Advice can include maps and equipment which is at hand which may assist in combating the incident.</td>
</tr>
</tbody>
</table>

### Evacuation

For large dangerous incidents such as large bush fires or major flooding, the Site Controller may consider evacuation of staff to appropriate distances away from the incident. If an Emergency Plan has been developed, this plan will provide appropriate distances and or locations of evacuation areas.
6 NOTIFICATION TO LOCAL LANDHOLDERS AND COMMUNITY

6.1 Community Communication and Consultation

Castle Mountain Zeolites has and would continue to undertake community and stakeholder consultation where necessary.

Castle Mountain Zeolites will continue to update the community where required.

Names and contact details of stakeholders, including local and downstream residents are included.

- Early warnings: same day telephone notification to landholders whom may be affected by the incident over the subsequent 24 hour period
- Updates: follow up phone calls to all landholders whom may have been notified by the initial early warning. Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, or media statements.

Priority will be given to notification of sensitive premises in close proximity such as schools, preschools, nursing homes and hospitals. Information to the community will be relevant to the incident and may include the following details:

- Type of incident that has occurred
- Potential impacts on local landholders and the community
- Site contact details

6.2 Website information

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009 s98D:

(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:
   (a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,
   (b) if the person does not have such a website by providing a copy of the plan, without charge, to any person who makes a written request for a copy.

(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:
   (a) section 153C(a) of the Act, and
   (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).

Below is a recommended layout of what should be published on the Castle Mountain Zeolites website with a link to it in a prominent position.
6.3 Availability and Location of This Plan

The POEO (General) Regulation 2009 s98D(1) states:

(1) A plan is to be made readily available:
   (a) to an authorised officer on request, and
   (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.

The availability of this Plan will be made available by locating printed copies in the same locations as the Environment Protection Licence (EPL) is located – namely in the Administration office and on site.

Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2009 s98D(3) which States

4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

TRAINING –
All personnel affected by the content of this document will receive instruction or explanation on the relevant parts of the document as per the Training and Competence Standard. Incident management and emergency response shall be included in all site inductions.

A training exercise designed to test the adequacy of emergency preparedness and response will be undertaken at least once each year.
Training exercises may involve the emergency response team and or other site personnel.
All training records, including the name of the person undertaking training and date of training, shall be maintained in compliance with OHSMS Standard 13 – document control

To also satisfy the requirements under this PIRMP the training is to also include:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents
7 UPDATING OF PLAN

Effective date: 10 November 2014

Review date: The Plan will be updated according to the following:

- 12 months from the last update;
- Within one month of a Category 1 Incident
- As identified after testing of the Plan

8 TESTING

The POEO (General) Regulation 2009 98E states for testing of the Plan:

The testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Testing shall be undertaken in the following ways:

1) the PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training requirements.
2) A review of the PIRMP will occur every 12 months commencing from the date of authorization. Contact details in this document must be kept current at all times.
3) The PIRMP will be reviewed within one month from the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to provide the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Records will be kept in accordance OHSMS standard 13 – document control and will be included in this plan. Information to be retained regarding PIRMP testing includes:
1) the manner in which the test was undertaken
2) dates when the plan has been tested
3) persons who carried out the testing
4) date and description of any update of or amendment to the plan

Availability of the PIRMP

The PIRMP will be kept in written form in the Castle Mountain Zeolites Administration office and at the quarry. It shall be made available to all personnel responsible for
9 IMPLEMENTATION OF THE PLAN
The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs. $2 million maximum fines apply for failing to implement the Plan.

Hence if a pollution incident occurs:

- It must be responded to according to this Plan and its reference documents.
- An incident response report/audit must be completed

APPENDIX 3 – REGULATORY REQUIREMENTS

PIRMP Legislation

POEO Act Part 5.7

Duty of licence holder to prepare pollution incident response management plan
The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

Information to be included in plan
A pollution incident response management plan must be in the form required by the regulations and must include the following:

(a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:
   (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
   (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
   (iii) any persons or authorities required to be notified by Part 5.7,

(b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,

(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,

(d) any other matter required by the regulations.

Keeping of plan
A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.

Testing of plan
A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.
Implementation of plan
If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.

POEO (General) Regulation 2009

Hazards:
98C(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates

Likelihood:
98C(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,

Pre-emptive Action:
98C(c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,

Pollutant Inventory Types:
98C(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,

Pollutant Inventory Quantities:
98C(e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,

Safety Equipment:
98C(f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,

Staff Contacts:
98C(g) the names, positions and 24-hour contact details of those key individuals who:

- are responsible for activating the plan, and
- are authorised to notify relevant authorities under section 148 of the Act, and
- are responsible for managing the response to a pollution incident,

Authority Contact:
98C(h) the contact details of each relevant authority referred to in section 148 of the Act,

Early Warnings Neighbours:
98C(i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,

Staff Safety:
98C(j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,

Maps:
98C(k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,

Early Warnings General:
98C(l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,

Training of Staff:
98C(m) the nature and objectives of any staff training program in relation to the plan,

Timing of Testing:
98C(n) The dates on which the plan has been tested and the name of the person who carried out the test,
Pollution Incident Response Management Plan for CASTLE MOUNTAIN ZEOLITES

98C(o) Updating of Plan: 
the dates on which the plan is updated,

98C(p) Plan Testing 
the manner in which the plan is to be tested and maintained.

Availability of plan: 
(1) A plan is to be made readily available:
   (a) to an authorised officer on request, and
   (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, 
      to any person who is responsible for implementing the plan.

98D(1) Availability of plan: 
(1) A plan is to be made readily available:
   (a) to an authorised officer on request, and
   (b) at the premises to which the relevant licence relates, or where the relevant activity takes place,
      to any person who is responsible for implementing the plan.

Publishing Plan Parts: 
(2) A plan is also to be made publicly available in the following manner within 14 days after it is 
prepared:
   (a) in a prominent position on a publicly accessible 
      website of the person who is required to 
      prepare the plan,
   (b) if the person does not have such a website--by providing a copy of the plan, without charge, to 
      any person who makes a written request for a copy.

98D(2) Publishing Plan Parts: 
(2) A plan is also to be made publicly available in the following manner within 14 days after it is 
prepared:
   (a) in a prominent position on a publicly accessible website of the person who is required to 
      prepare the plan,
   (b) if the person does not have such a website--by providing a copy of the plan, without charge, to 
      any person who makes a written request for a copy.

Procedures under Act: 
3) Subclause (2) applies only in relation to that part of a plan that includes the information required 
under:
   (a) section 153C(a) of the Act, and
   (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).

Privacy Protection: 
(4) Any personal information within the meaning of the Privacy and Personal Information Protection 
Act 1998 is not required to be included in a plan that is made available to any person other than a 
person referred to in subclause (1).

98D(4) Privacy Protection: 
(4) Any personal information within the meaning of the Privacy and Personal Information Protection 
Act 1998 is not required to be included in a plan that is made available to any person other than a 
person referred to in subclause (1).

Testing of the Plan - 1) The testing of a plan is to be carried out in such a manner as to ensure that 
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.

98E(1) Testing of the Plan - 1) The testing of a plan is to be carried out in such a manner as to ensure that 
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.

Minimum Testing: 
2) Any such test is to be carried out:
   (a) routinely at least once every 12 months, and
   (b) within 1 month of any pollution incident occurring in the course of an activity to which the 
      licence relates so as to assess, in the light of that incident, whether the information included in 
      the plan is accurate and up to date and the plan is still capable of being implemented in a workable 
      and effective manner.