NOAKES NORTH SYDNEY
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
EPA LICENCE: 10893

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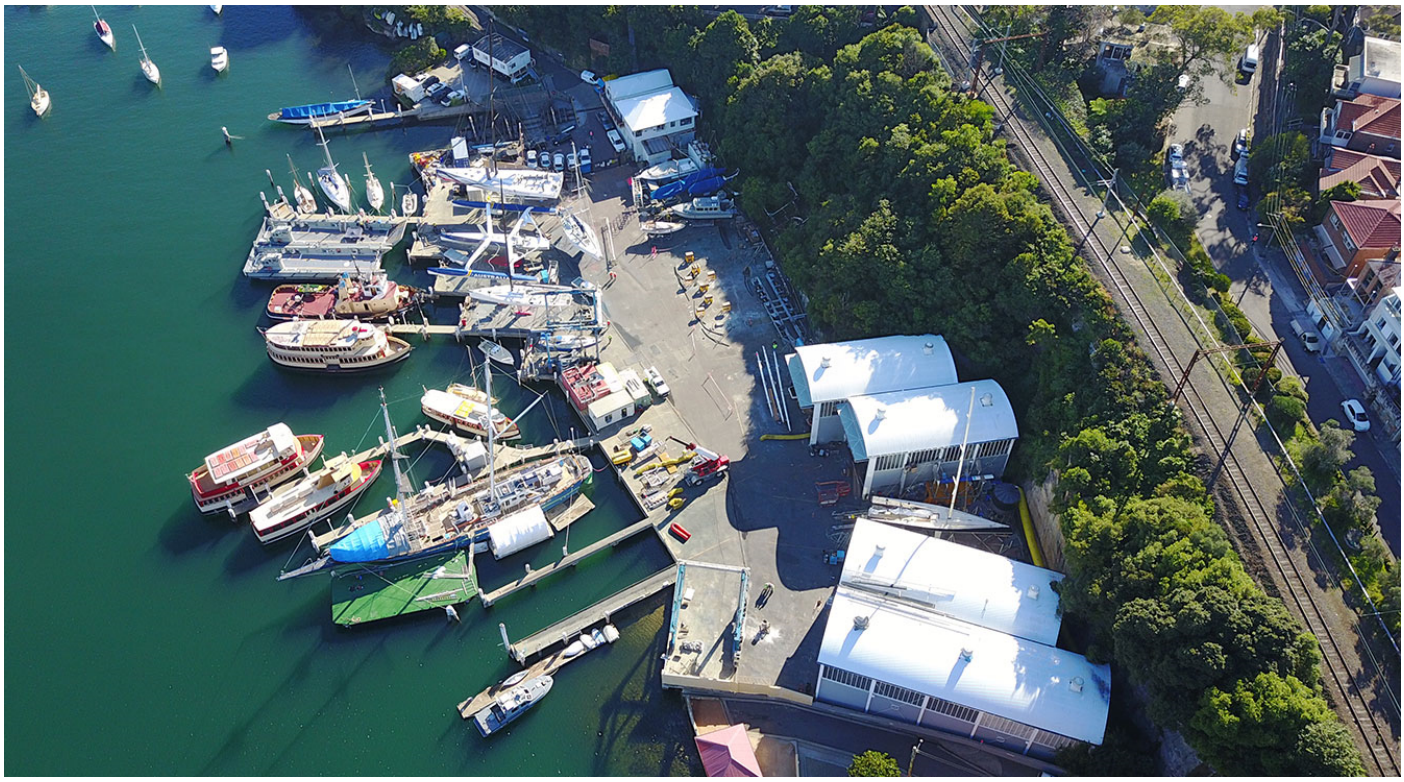


Noakes Group Pty Limited
6 John Street McMahons Point NSW 2060 PO Box 1644 North Sydney NSW 2059
Tel: 02 9925 0306 Fax: 02 9929 6028 Email: info@noakes.net.au ABN 36 002 057 294

Contents

1 Introduction

1.1 Facility Details

Company Name	Noakes Group P/L
Scheduled Activities	Marine vessel repairs, slipway and travel lift operation, vessel charter
Facility Name & Address	Noakes Group P/L 6 John Street, McMahons Point, North Sydney, 2095, NSW

1.2 Designated Person

Environmental incident Designated Person:

Name	Tony Dillon
Title	HSEQ Administrator
Email	tony@noakes.net.au
Number	(02) 9925 0306 / 0438210564

Designated Person is responsible for:

i. Ensuring that the PIRMP is working and reporting to the Managing Director if remedial action or changes to the plan are needed;
ii. Ensuring that vessel crews, yard employees and contractors on site are operating safely and are not polluting the environment;
iii. Ensuring that the vessel crew, yard employees and contractors onsite have what they need to run safely and efficiently;
iv. Organising a regular review of the PIRMP.

Pollution incident response on site is managed by the Yard Production Manager who will follow the response detailed in this PIRMP, including notifying the relevant Authorities and the Designated Person
If an Environmental incident occurs when the Yard Production Manager is not present the Duty Manager will assume this responsibility. If the Incident is after normal working hours the Duty Manager will respond in accordance with PIRMP requirement

1.3 Overview of Operations

The premises of Noakes Group head office in North Sydney include a 155ton slipway with EPA approved water containment, an 80ton and 60 ton travel lift. The Travel lifts operate on hard-stand fitted with water catchment drains
Water is directed to a water treatment system for processing prior to discharge to sewer. Four main sheds provide all weather repairs and containment for shipwright work and repairs to marine vessels.

Recreational yachts and powerboats, as well as Government and Defence assets, commercial yachts and power vessels utilize the Noakes Group facilities for vessel maintenance and repairs.

Rosman Ferries which are a part of the Noakes Group P/L operate from the Noakes North Sydney site. These are a fleet of ex-Sydney Harbour Ferries which are chartered to individuals or companies for transport or events

1.4 PIRMP Objectives

i. To ensure comprehensive and timely communication about a pollution incident to staff at the premises
ii. To notify the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as Roads and Maritime, NSW Port Authority, local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of a pollution incident
iii. To 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
iv. To 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.

1.5 Definitions

Pollution incident
An incident or set of circumstances during or as a consequence of which there 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 does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm
Actual or potential harm to the health or safety of people or to ecosystems that is not trivial, 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 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.

1.6 Duty to Report a Pollution Incident

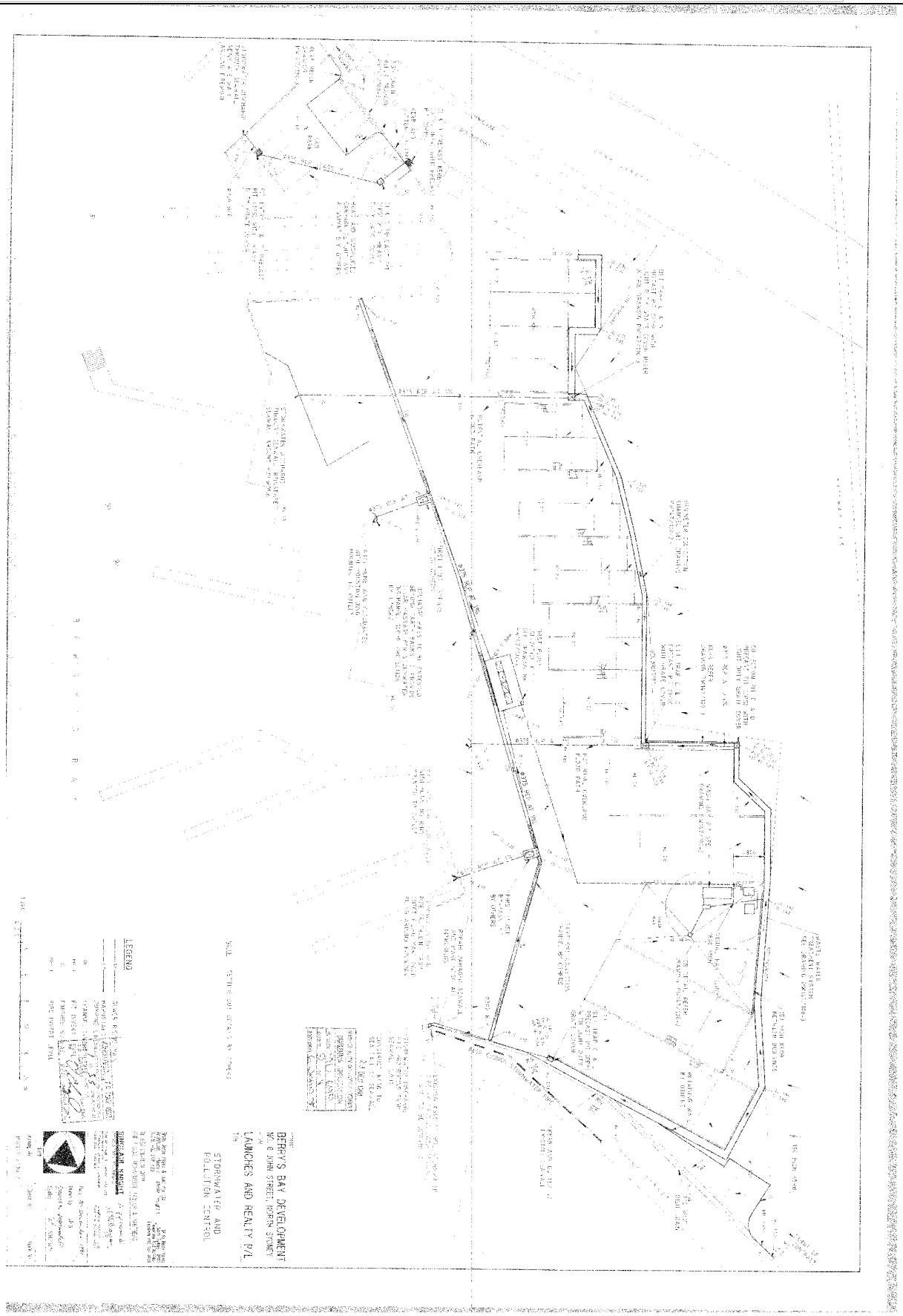
i. Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:
    a. The person carrying on the activity;
    b. An employee or agent carrying on the activity;
    c. An employer carrying on the activity;
    d. The occupier of the premises where the incident occurs.
ii. Notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.
iii. You do not have to report if you know that all relevant authorities have already been notified by the licensee.
iv. Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurs, have a duty to report the incident.

If you are concerned about pollution, and an approach to the person causing the problem is not possible or is unlikely to be successful, please raise the concern with the relevant authority

1.7 Areas likely to be affected by a Pollution Incident
Intention of Noakes Pollution Incident Response is to contain any incident within the site boundaries and Noakes water lease. If the incident extends beyond the site it may affect the surrounding neighbourhood and harbour.

i. Spill to the water may affect Berry's Bay, may lead to greater Sydney Harbour if a major incident
ii. Surrounding residential neighbourhood includes Johns Street, Dumbarton Street & Munro Street residents
iii. Waverton Park located at the end of Berry's Bay

1.8 Stormwater Drainage



2 Hazard/Pollutant Identification

2.1 Hazard Inventory

Inspections have been conducted to establish an inventory of storages at each of the site storage facilities identified in Figure 2.1. Other potential sources of hazards that have been identified, include vessels using the facility and site services. A further potential source of contaminate is from the waste treatment plant (same potential chemical hazard as storage containers). The inventories include details of potential pollutants at the storages, at the catchments and vessels at berths or on the slipway. Processes have been put in place to audit the content and condition of sites listed above as well as performing weekly inspection, documentation check and CMMS scheduled maintenance.

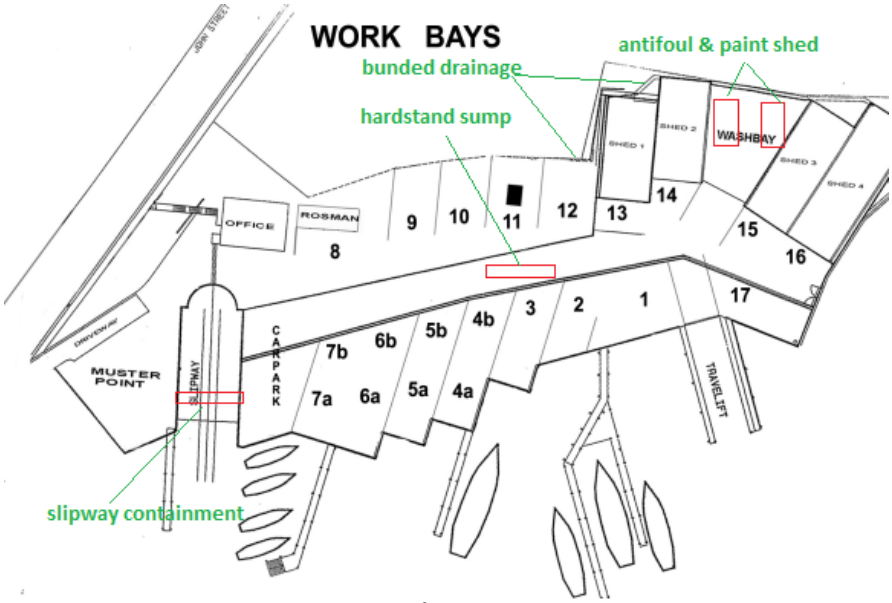


fig 2.1

All hazardous materials brought onto site must be accompanied by the relevant Safety Data Sheet (SDS). This is checked on receipt of goods. Copies of all SDS are kept in the office and at hazardous containers. Quantities of Hazardous Goods on site are tracked using the CMMS system (MEX). The Hazardous Chemical Register, which includes the relevant SDS's is held in the Defence & Commercial office.
Quantities carried on site are above the threshold requiring placarding for class 3 goods (1000L) but less than those requiring a site manifest.
The Noakes Group site will hold no more than 1000lt of potential pollutants / hazardous goods.

First Flush:
Storage of first flush contaminated water or stormwater is in located in underground tanks. The first flush water from a storm event and any other waste water is collected in a 32,000 litre underground tanks with an additional 16,000 litre underground tank. The trade waste water is treated with a polymer and caustic soda and the treated water is then tested and discharged to Sydney water under the trade waste agreement.

Site Environmental Hazards have been identified as:

i. Fuel/oil spill to water;
ii. Contaminated sump overflow;
iii. Spray painting overspray past site boundary;
iv. FRP grinding dust;
v. Paint spill hardstand;
vi. Oil spill hardstand;
vii. Paint store fire;
viii. Vessel fire in water;
ix. Vessel fire at hardstand;
x. Fuel fire at hardstand;
xi. LPG/acetylene leak;
xii. Noise pollution from fabrication

2.2 Risk of Hazard Occurring

Regardless of whether a particular incident is captured within the hazard assessment tables, any pollution incident with the potential for material consequences will be addressed as per the "Incident Response Protocols" of this plan.
The likelihood and the severity of outcomes have been evaluated using Noakes Risk assessment form. (See Fig 2.2)

Hazard Risk Assessment rating (1 - 5, 1 being unlikely, 5 being likely)		Noakes Group 6 John st McMahons Point
Date: 10/03/2014		
Name:	Position:	Sign:
Approved:	Position:	Sign:

Risk Assessment Number:							
Potential hazards	**Risk Assessment - liklihood**					**Controls**	**Comments**
	1	2	3	4	5	*PPE*	
Fuel / oil spill into water		2				2	*Oil boom, spill kit as req'd*
Containment sump overflow			3			2	*Pump out immediately*
Spray painting overspray				4		8	*Use approp. Containment*
FRP grinding to atmosphere					5	8	*Use approp. Containment*
Paint spill hardstand			3			8	*Paint spill kit*
Oil spill hardstand		2				2	*Oil spill kit*
Paint store fire	1						*Fire hose, 000*
Vessel fire in water	1						*Isolate, fire hose, 000*
Vessel fire hardstand	1						*Isolate, fire hose, 000*
Fuel fire hard stand	1						*Call 000*
LPG / Acetylene gas bottle leak	1					9	*Remove ignition sources*
Noise pollution fabrication			3			5	*Comply to noise Regs*
Potential hazards	**Risk Assessment - Severity**					**Controls**	**Comments**
	1	2	3	4	5	*PPE*	
Fuel / oil spill into water				4		2	*Activate spill kits*
Containment sump overflow			2			2	*Requires monitoring with rain*
Spray painting overspray		2				8	*Prepare and assess*
FRP grinding to atmosphere		2				8	*Prepare and assess*
Paint spill hardstand	1					8	*Low risk, clean as rq'd*
Oil spill hardstand	1					2	*Low risk, clean as rq'd*
Paint store fire				4			*Isolate and extinguish*
Vessel fire in water			3				*Isolate and extinguish*
Vessel fire hardstand					5		*Severe, isolate, remove all ppl*
Fuel fire hard stand				4			*Sound alarm, extinguish*
LPG / Acetylene gas bottle leak			3			9	*Unlikely, follow protocol*
Noise pollution fabrication	1					5	*Stop work, assess*

Fig 2.2

2.3 Pre-emptive Actions

Each identified hazard has been linked to events that potentially lead to an incident. In order to mitigate the potential harm created in a pollution incident, pre-emptive actions have been incorporated into site JSEA and works instructions. Each hazard identified has been addressed to reduce the risk and severity.

a Fuel/oil spill into the water

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Fuel/ oil container lid not sealed correctly
ii. Transfer of fuel/oil
iii. Pump out of vessels contaminated bilge

The pre-emptive actions to be taken are as follows:

i. Ensure spill kit is present when transporting any fuel oils, including fuel filling and changing lubrication oils.
ii. Use appropriate and approved fuel lines and fittings.
iii. Ensure the vessel is secured.
iv. Never leave open containers of fuel/oil /hydrocarbons anywhere on the hardstand or any vessel.

b Containment Sump Overflow

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Checks not carried out on sump

The pre-emptive actions to be taken are as follows:

i. Dig sump pit out monthly.
ii. Monthly check of all containment and bunding systems.
iii. Always monitor the sump level during heavy rainfall.
iv. Always ensure good access to sump pit at all times.

c Over Spray from Spray Painting

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Windy conditions
ii. Personnel walking into area of spraying

The pre-emptive actions to be taken are as follows:

i. Try to keep all painting confined to the sheds with good ventilation.

If spraying on the hardstand:

i. Full masking of all property within 4 meters, tarpaulin covers for as much property as possible
ii. Signage to all people in vicinity warning to "keep clear"
iii. Physical barriers to prevent entry from anyone on site
iv. Refer to the Noakes MSDS forms regarding spray painting

d FRP grinding and other composites:

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Grinding in doorway

The pre-emptive actions to be taken are as follows:

i. Use of Noakes PPE level 8
ii. Full containment of site with dust extraction
iii. Monitor condition of extraction bags and fans, empty and change as required
iv. "No Entry" Signage for all people on site

e Paint spill hardstand

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Spill of chemical from vessel on hardstand

The pre-emptive actions to be taken are as follows:

i. Drop sheets to be used underneath open containers of paint and thinners
ii. Saw dust and absorbent mats are made available to all painters for immediate removal of spilt paint
iii. HP water blast into EPA approved drainage sump on hardstand

The hardstand is designed to contain hazardous waste only simple measures are required

f Oil spill hardstand

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Spill of Oil from machinery on hardstand

The pre-emptive actions to be taken are as follows:

i. Emergency spill kits are available throughout the site (see fig 3.2)

ii. Ensure that all staff and contractors have had appropriate training for handling oil and oily waste. Contractors MUST show current insurance policies.
iii. Saw dust and absorbent mats are made available to all staff for immediate removal of oil contaminations
iv. HP water blast into EPA approved drainage sump on hardstand

The hardstand is designed to contain hazardous waste only simple measures are required

g Paint store fire

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Chemical leak onsite land storage

The pre-emptive actions to be taken are as follows:

i. Keep the paint store clean and well ventilated
ii. No hot works within 15m of the paint storage containers
iii. No open containers to be left inside store
iv. Approved and labelled fire extinguishers at each door (see map)

h Vessel fire in water

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Sparks from machinery/electrical
ii. Sparks from welding on-board

The pre-emptive actions to be taken are as follows:

i. All portable electrical equipment and leads to have in date test tags
ii. Staff to clean vessel of contaminants / flammable debris and any oily bilge water before hot work
iii. Fire watch to be used on both sides of any bulkhead or deck in case of hot works
iv. Any gas/LPG on vessel to be isolated at bottle

i Vessel Fire Hardstand

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Mechanical failure of machinery

The pre-emptive actions to be taken are as follows

i. Fire watch for all hot work, extinguisher made available
ii. Staff to monitor oily bilge water and other flammable contaminants before hot work

j Fuel Fire Hardstand

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Fuel spillage during dispensing of fuel

The pre-emptive actions to be taken are as follows

i. No hot works within 15m of diesel fuel container. extinguisher to be made available
ii. Keep area clean and monitor / check for leaks
iii. Safety signage in good order
iv. Painted hardstand with area visibly outlined
    a. If fire - call 000, activate fire alarm
    b. Fight fire from safe distance with appropriate equipment available

k LPG/Acetylene gas bottle leak

Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Gas leak from gas bottle

The pre-emptive actions to be taken are as follows

i. All bottles in storage are to be chained in the designated space in the wash-bay.
ii. If leaking follow fire protocol
iii. No open flames within 15m of a leaking or ruptured bottle
iv. Notify the supplier
v. Ensure bottle does not vent in a confined space

l Noise pollution from fabrication/tradesmen

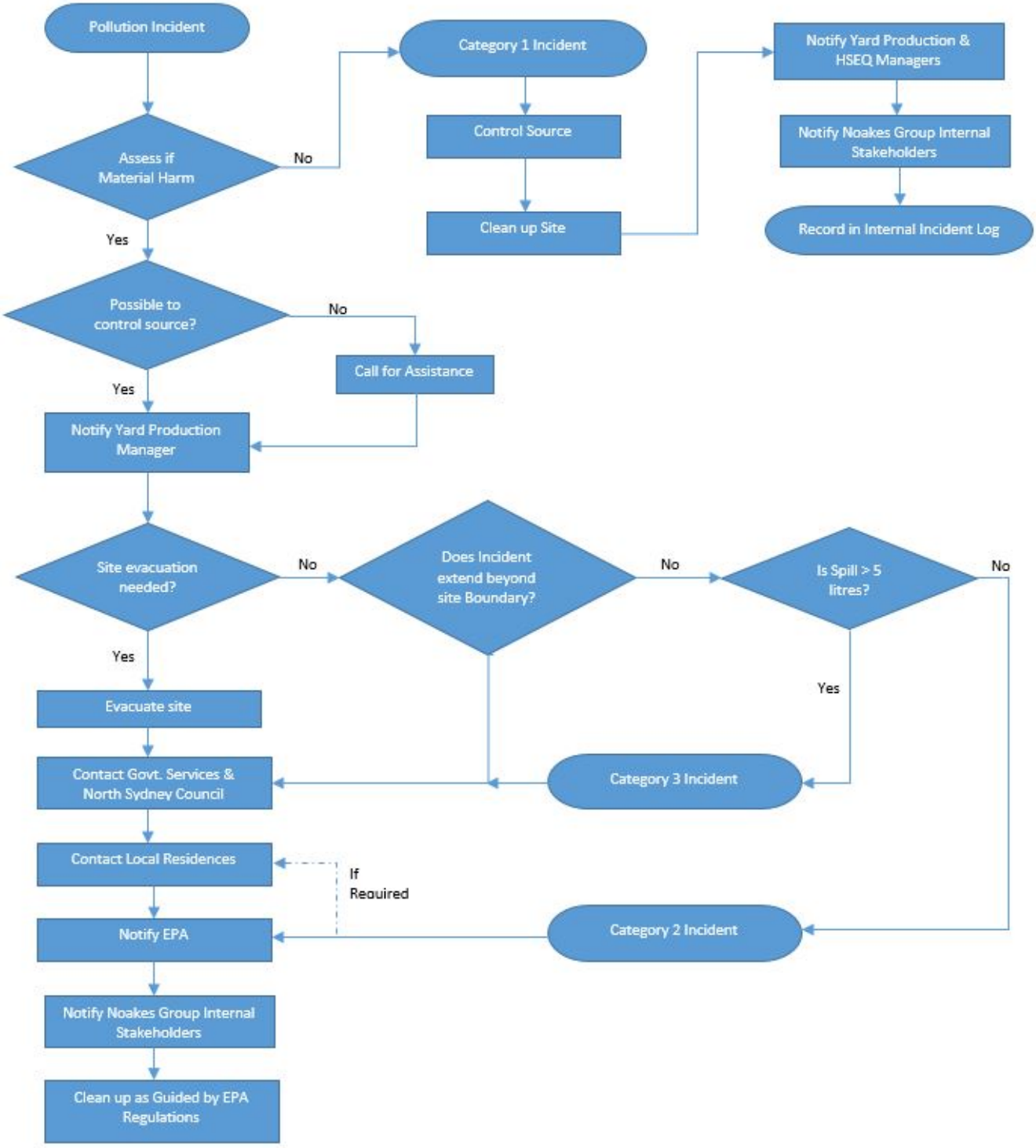
Pollution Incident hazards and events that could, or would increase the likelihood of Occurrence:

i. Machinery starting up outside working hours

The pre-emptive actions to be taken are as follows

i. Always work to the designated times for each activity
ii. Remove, as much as possible, all fabrication and noisy work to the sheds
iii. Refer to "Nation Standard for Occupational Noise, NOHSC: 1007(2000)" available online or in the Noakes main office.

2.4 Pollution Incident Decision Flowchart



2.5 Hazard Identification & Assessment

Site inspections are routinely conducted to identify the main hazards to human health or the environment associated with a pollution incident at the facility. This includes recording a detailed description of how any identified risk of harm to human health will be reduced.

Pollution incidents have the potential to escalate quickly, and a rapid response will help to reduce the risk, or effects of such harm. Employees of Noakes Group will do everything possible, including adequate resourcing to limit the effects of any leak or spill.

The following considerations have been made:

i. Raising the alarm – the Emergency Procedures provide the method and means or raising the alarm and responding to an incident;
ii. Containing pollution – Initially response will attempt to stop or contain the source of the leak;
iii. Noakes spill kit contents shall be deployed to contain any spill in accordance with training provided;
iv. Disposal of contaminated waste – any contaminated spill equipment shall be disposed of as contaminated/hazardous waste, depending on the product contained. A specialist waste contractor with experience and facilities to dispose of such waste will be engaged when necessary.

2.6 Determination of Incident Category

Incident response and notification requirements are determined by the category of the incident and if actual "Material Harm" results.

Incidents are categorised according to the 'Noakes Pollution Incident Decision flow chart' as a Category 1, 2 or 3 Incident, if they extend beyond the site boundaries and if Noakes can contain the incident or require external agency assistance.

3 Incident Response Protocols

This section provides details on the incident response protocols, including the communication protocol and on-site emergency response actions, for the responding to an incident that has resulted in a material impact to human health or the environment, as per previous definition.

3.1 Communications Protocol

		Category 1 (< 1 litre)	Category 2 (>1 litre & <5litre)		Category 3 (>5litre)
	Contacts		Internal	Beyond Site	
Noakes Group	Production Manager	◆	◆	◆	◆
	Operations Manager	◆	◆	◆	◆
	HSEQ Manager	◆	◆	◆	◆
	Managing Director	◆	◆	◆	◆
	GM Rec/GM Defence	◆	◆	◆	◆
Government	EPA		◆	◆	◆
	Minister of Health	If Employees effected	If Employees effected	◆	◆
	Safe Work NSW	If Employees effected		◆	◆
	Police/Fire			◆	◆
	Sydney Water		If effected	◆	◆
	Roads & Maritime		If effected	◆	◆
Community	Residents		If effected	◆	◆
	North Sydney Council			◆	◆

3.2 Stakeholders

3.2.1 Internal Stakeholders (employees/contractors)

Internal communications will be undertaken as per the site Incident Management Manuals.

Noakes Group	
Managing Director - Sean Langman	(02) 9925 0306/0419 415 032
GM Defence & Commerical – Owen Kenny	(02) 9925 0306/0459 598 490
GM Recreational - Pete Inchbold	(02) 9925 0306/0405 190 002
Reception	(02) 9925 0306
HSEQ Manager – Tony Dillon	(02) 9925 0306/0438 210 564
Yard Production Manager – Peter Langman	(02) 9925 0306/0418 116 158

3.2.2 Government Agencies

The management of Noakes Group are responsible for the activation of this plan and have authorisation to contact external agencies, listed in the table below. The relevant government agencies will be notified of a material harm event immediately (i.e. without delay).

External Agencies	
Environmental Protection Authority	13 15 55
Ministry for Health	1300 066 055
Safe Work NSW	13 10 50
Nth Sydney Council	(02) 9936 8100
Police, Fire and Rescue NSW	(02) 9319 7000
Sydney Water	13 20 90
Roads and Maritime (Sydney)	13 12 56

Section 150 of the POEO Act provides the information that needs to be notified:

a The time, date, nature, duration and location of the incident;

b The location of the place where pollution is occurring or is likely to occur, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
c The circumstances in which the incident occurred (including the cause of the incident, if known);
d The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

Only known information should be provided when notifying of a Material Harm pollution incident. If further information becomes known after the initial notification that information must immediately be notified to all authorities in accordance with Section 150.
The immediate verbal notification is to be followed by written notification to each relevant authority within seven days of the date on which the incident occurred. Complying with these notification requirements does not remove the need to comply with any other legislative requirements for incident notification (e.g. requirements under EPL conditions or the Work Health and Safety Act 2017).

3.2.3 Community Stakeholders
Community stakeholders that are potentially affected by a material harm effect will be notified immediately by one of the following methods:

i. Door knocking by company representative(s) or emergency services personnel (depending on the nature of the event);
ii. Phone call by company or emergency response representatives;
iii. Company representative(s) to notify contact council and website.
Council number (02) 9936 8100
Email council@northsydney.nsw.gov.au

The appropriate method for communication will be determined by the nature of the event or as directed by the relevant agency. The following should be considered:

i. Does the pollution incident have the potential to affect a business or household?
ii. How will it affect them (short and long term)?
iii. What actions need to be taken by the properties to protect them from harm?

At the direction of the Managing Director, contact will be made with affected properties/premises to provide the following information relevant to the pollution incident:

i. What has happened;
ii. The environmental and, or safety implications for them;
iii. Actions taken or being taken to minimise harm or risk;
iv. What to expect;
v. Contact details for further queries or concerns.

On the Noakes Group Website (www.noakesgroup.com.au) is a link to the EPA Website (www.epa.nsw.gov.au) that includes procedures that should be followed if a pollution incident did occur. The website also includes section 3.2.2 and 3.2.3 of the PIRMP.
In situations when the local community has been involved by notification of a Pollution Incident information will be regularly updated by publication on the Noakes website, Facebook page, or communicated via other social media channels.
A copy of the Noakes PIRMP is available on request.

3.3 Onsite Incident Management & Response
3.3.1 Actions to be taken during a pollution incident

i. Person identifying the pollution incident must attempt to halt the cause of the incident if it is safe and timely to do so. If not possible immediately call for help;
ii. Notify the Yard Production Manager who will take charge of the incident response, (if yard production manager is offsite or unavailable notify any yard management who will in turn take production managers role or handover to HSEQ Manager);
iii. Yard Manager will immediately determine if there is risk of harm to employees or community and reduce as possible, notifying RGA of any perceived risk;
iv. If necessary the site will be evacuated to protect personnel from any risk to human health;
v. Yard Production Manager will determine if external assistance is required;
vi. Yard manager will secure the affected area ensuring non-essential personnel are excluded;

vii. Yard Production Manager will ensure cause of incident is made safe;
viii. Yard manager will ensure that correct procedures are followed during any incident response including compliance with use of appropriate PPE for tasks;
ix. Yard Production Manager will immediately notify Noakes Stakeholders and required Relevant Government Authorities

3.3.2 Actions to be taken immediately after a pollution incident

i. If material harm has occurred Yard Production manager will liaise with the relevant Government Authority prior to clean up;
ii. If no material harm, clean up and damage remediation should commence immediately under the direction of the Yard Production Manager;
iii. If incident affects areas beyond the site boundaries or water lease, the Yard Production Manager will liaise with the Managing Director with regard to notification of community members;
iv. Contaminated materials must be disposed of appropriately (as Hazardous Materials if required);
v. Restock of spill kits etc. is to be undertaken immediately;
vi. HSEQ Manager to update website and social media as appropriate.

3.3.3 Follow up of Pollution Incident

i. Yard Production Manager to follow up with HSEQ Manager to ensure incident report and RGA 7day reporting are completed;
ii. HSEQ manager to perform incident investigation identifying root cause and ensuring that site procedures are modified to stop any reoccurrence.

3.3.4 Audit

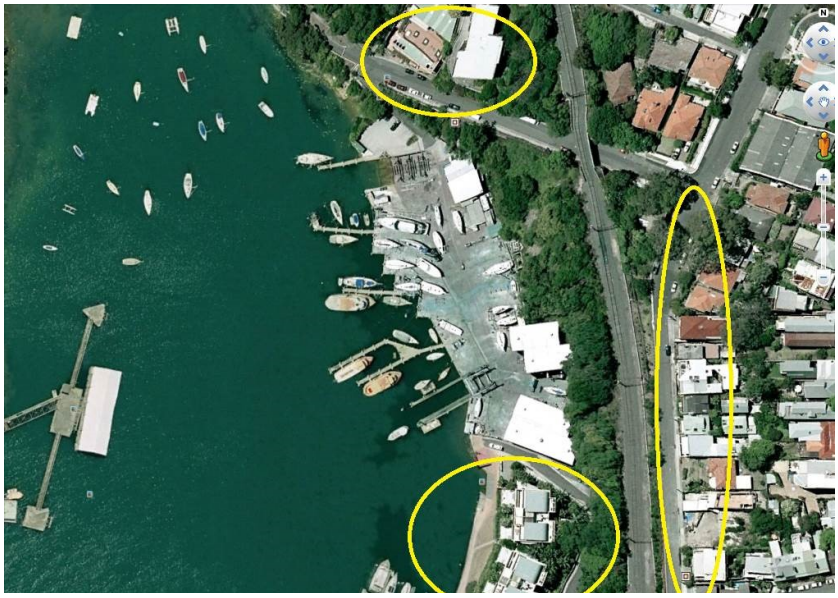
Audit to conducted by HSEQ manager annually to ensure follow up and PIRMP are implemented and updated correctly.

3.4 Minimising harm to persons on the premises

These arrangements are necessary to ensure any persons who are on the premises or who are present when an incident occurs, can be quickly evacuated to a safe area when activation of emergency procedures is in process. Noakes Group has available at short notice, suitable consultants to provide expert medical, toxicology or environmental impact advice should that be required.

If a pollution incident provides an immediate risk of harm to persons within, or beyond the site boundary, the evacuation procedures shall be followed. Evacuation procedures are contained within the Noakes Group Emergency Procedures document.

There are several residences around the Noakes site which may require notification if an EPA incident occurs. These residences are within 100m of the Noakes hardstand. The picture below circles the residences on John Street, Dumbarton Street and Munro Street which may require evacuation in the event of a serious Incident. As part of the evacuation, people at Waverton park will be informed of the incident.



3.5 Staff Training

Section 153D of the Act specifies the requirements for adequately training staff on all procedures necessary for them to safely and efficiently tackle pollution incidents. This includes both informal and formal staff training and at times simulated exercises that may be held in conjunction with defence department.
All employees of Noakes Group are provided with training on response to a pollution incident.
Nature and purpose of the training is to education all Noakes Group staff on the environmental impact of chemicals and process on how to clean up a spill if it occurs.

3.5.1 Frequency of Training

PIRMP simulated training is conducted 12 monthly.

3.5.2 Simulated Exercises

A simulated test of this PIRMP is undertaken annually. The objective of this exercise is to test the effectiveness of the plan and provide an interactive training for staff.
HSEQ Manager is responsible for ensuring these exercises are undertaken. The planning of this exercise is to be taken by the GM at Noakes Group.
The goal of this exercise is to provide a situation that is reflective of an incident that may be encountered on site. Safety is paramount for this exercise and no actual hazard will be present.

A requirement of the simulation exercise is to:

i. At the toolbox talk in the morning of the simulation, the site supervisor will refresh the staff on the PIRMP and inform them that the simulation will occur that day;
ii. Designate a location on site for the incident to occur; define the incident. This will include a pollutant common to the site, volume or size of the pollutant and the staff involved;
iii. Activate the evacuation procedure and muster all staff to the assembly point;
iv. Allocate an officer for auditing/supervising this simulation (this should be an officer who is not responsible for the activation of the plan).

The outcome of this exercise is to:

i. Instruct staff on how to implement this plan;
ii. Contain and manage an incident relative to the site;
iii. Initiate an evacuation;
iv. Document an incident
v. Ensure all reporting paperwork is completed and the relevant authorities contacted (only call internal staff and indicate this is part of a simulation. Do not call external authorities);
vi. Provide feedback to all staff. Where there are non-compliances with the plan, this can be used to refine the PIRMP and provide further training if required.

Elements of pollution incident training are included in training provided to Noakes staff and Contractors and can be found within the following:

i. Training and Induction;
ii. First Aid Qualifications;
iii. Fire Training and Hazardous chemical training;
iv. Emergency response training, including emergency response drills.

3.6 Safety Equipment & Signage

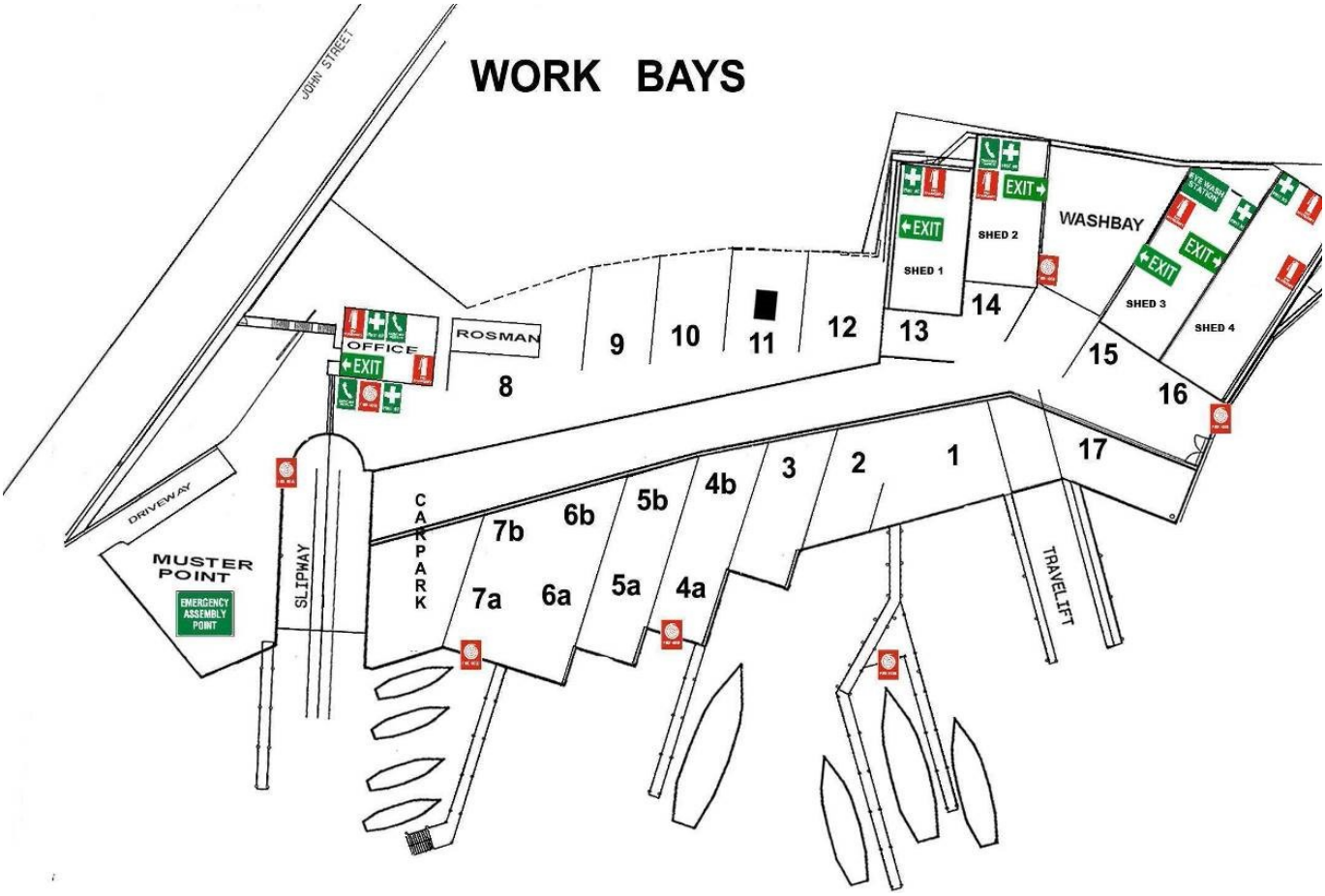


fig 3.1

Safety Equipment Type	Location
Fire Extinguisher	Main Office - Upstairs
Fire Extinguisher	Main Office - Down Stairs
Fire Extinguisher	Shed 1
Fire Extinguisher	Shed 2
Fire Extinguisher	Shed 3
Fire Extinguisher	Shed 4
Fire Hose	Main Office - Down Stairs
Fire Hose	Carpark
Fire Hose	Rosman Pier
Fire Hose	Shed 2
Fire Hose	Back wall
Fire Hose	Bay 5
Fire Hose	Bay 7
Fire Hose	Slipway
Absorbent Spill Kit - wheelie bin	Runway
Absorbent Spill Kit - wheelie bin	Slipway
Absorbent Spill Kit - wheelie bin	Liquid waste area
Absorbent Spill Kit – wheelie bin	Bay 5a
Saw dust wheelie bin	Liquid waste area
Saw Dust wheelie bin	Wash bay

fig 3.2

3.7 Transport of Trackable Waste

Noakes Group does not hold a license to transport waste of any kind. All waste collection and removal is contracted by various companies depending on the type of waste as detailed below.
General waste: **'Cleanaway'** - 5/207 Pacific Hwy St Leonards NSW - (02) 8985 5600
Skip bins: **'Dial a Dump'** - 32 Burrows Rd, Alexandria NSW 2015 - (02) 9519 9999
Scrap Metal: **'North Shore Metal Recyclers'** - 51 Dickson Ave Artarmon NSW - (02) 94363000
Oil / waste: **'Trans Pacific' -** 13 13 39

Hardstand Liquid waste: **'Onsite water treatment plant' –** Noakes Group P/L
Hardstand solid waste: **'Onsite sullage tanks'** – Noakes Group P/L

4 Administration

This section of the plan provides details on the process that will be used to make site personnel aware of the plan requirements and document the process for periodically testing the plan.

4.1 Staff Awareness & Training

All site personnel are made aware of the requirements of this plan during the Site Induction Video and process with management. Completion of this site induction is mandatory and a pre-requisite for walking onsite the yard. Refresher training is to be completed when changes have been made to the induction process.
All inducted personnel are made aware of the response required in case of a pollution incident. (As described in section 3.3.1)

4.2 Document Availability

In accordance with Section 153D of the POEO Act, the plan will be made available to all site personnel via the head office and all managers of the organisation. A hardcopy of the plan is available at all times, also in the head office.

4.3 Testing of Plan

Testing of this plan is to occur annually and recorded as minutes in the management meeting. Discussions (in-house) will take place as to the implementation of the plan and any recommendations to make the plan for effective.
The primary method for testing the plan will be via office meeting and simulated discussions and then an annual simulated event with drills.
Noakes will complete a test within 30 days after an incident occurs at the Noakes yard.
HSEQ Manager tests the plan with staff at Noakes group.

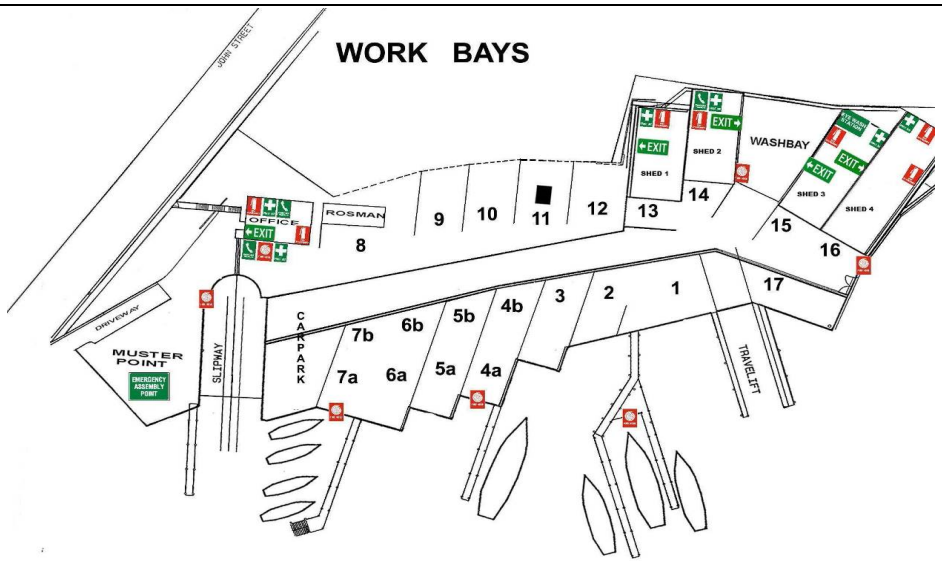
4.4 Table of Revision

Document Title	Date Issued	Author/Reviewer	Organisation	Details
PIRMP 01	Jan 16	HSEQ Manager	Noakes	New PIRMP
PIRMP 02	Feb 2016	HSEQ Manager	Noakes	Reviewed PIRMP
PIRMP 03	Dec 2017	HSEQ Manager	Noakes	Reviewed PIRMP
PIRMP 04	May 2018	HSEQ Manager	Noakes	Updated PIRMP
PIRMP 05	Oct 19	HSEQ Administrator	Noakes	Update PIRMP
PIRMP 06	Dec 20	HSEQ Administrator	Noakes	Update PIRMP
PIRMP 07	Sept 21	Operations Manager	Noakes	Review and update PIRMP

5 Forms

5.1 EPA Incident Form (NKS 141)

Incident:	**EPA Register No:**	**Date:**
Persons Involved:		

Incident Details: Description: Provide a brief factual description of what happened during the incident, including relevant details such as: 1: Estimate distance to nearest waterway (including stormwater drains) 2: Estimate distance to the nearest site boundary 3: Activity being undertaken when the incident occurred (Sketches/diagrams photos may be referenced & appended to this report to aid in the description of the incident	
EXACT Location of the incident Mark on Noakes Group site plan location of incident	
Quantity or volume of material escaped or causing **1: incident** (provide an estimate if quantity unknown) **2:** Product name/ manufacturer	
Who identified the incident?	☐ Contractor ☐ EPA Officer ☐ Council ☐ RMS (during inspection) ☐ EPA Complaints Line ☐ Community ☐ RMS (other) ☐ Other

Incident Classification	Description
Category 1	Oil/chemical spill less than 1 litre, or No action or potential material harm, or Continual with site boundaries & no RGA Notification required

Category 2	Oil / Chemical spill 1 litre – 5 litres or Potential material harm and no effect beyond site / material boundary
Category 3	Actual material harm or Local residents affected / notified External assistance to address incident required – more than 5 Litres of oil or chemical spill, or Incident effects beyond site / boundary site / water lease boundary

What immediate actions/control measures were taken to rectify or contain the incident?

What initial corrective action will be taken to prevent similar incidents recurring in the near future?

External notification
Was this a pollution incident that caused or threatened material harm to the environment? ☐ Yes ☐ No

Were any of the following authorities notified?

NSW Environment Protection Authority: Date: _____Time: _____Notified by: _____

Roads and Maritime: Date: _____Time: _____Notified by: _____

NSW Ministry of Health: Date: _____Time: _____Notified by: _____

Fire and Rescue NSW: Date: _____Time: _____Notified by: _____

Sydney Water: Date: _____Time: _____Notified by: _____

NSW Port Authority: Date: _____Time: _____Notified by: _____

North Sydney Council: Date: _____Time: _____Notified by: _____

Local Residents: Date: _____Time: _____Notified by: _____

Safe Work NSW: Date: _____Time: _____Notified by: _____

Person making report: _____ Date: _____

Position: _____

5.2 Pollution Incident Exercise Form

Pollution Incident Exercise

Name of Supervisor of Exercise:

Date & Time:	**Report to:**	**Report Date & Time:**
Location:		

Name of Attendees

Describe the situation to be simulated	
Location:	**Type of Incident:**
Describe the scenario:	

Outcomes	**Yes/No**
Did the PIRMP get executed in a timely manner?	
Where all staff aware of their responsibilities?	
Was the incident handled in accordance with the PIRMP?	
Did all relevant authorities get considered?	
Was the handling and containment of the incident appropriate?	

Comments and areas for improvement
Spill kit training on what items are in the kits to all Noakes Staff
EPA Incident form training

HSEQ Manager / Noakes Manager

Name: **Signature:** **Date:**

5.3 Pollution Incident Exercise Log

Date of Exercise	Exercise Description & Category Level	Location
01/06/2018	Toolbox talk	Morning brief
01/06/2018	Paint spill on hardstand – Cat 1	Hardstand – Bay 15