Pollution Incident Response Management Plan

Arumpo Bentonite Mine Site

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DOCUMENT CONTROL SHEET

Current Rev.	Date Implemented	PIRMP Test Schedule	Date for Next Review
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1. PURPOSE

The purpose of the Arumpo Bentonite Pollution Incident Response Management Plan is to:

- Provide direction to the staff at the Arumpo Bentonite Mine Site in responding to pollution incidents at the mining operations;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Wentworth Shire Council, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident at Arumpo Bentonite by identifying key risks and planned actions to minimise and manage those risks;
- Detail the training requirements for this plan, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

2. LEGISLATIVE REQUIREMENTS

The specific requirements for a PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation). In summary, this provision requires the following:

- all holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- the plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO (G) Regulation (clause 98B).

- Licensees must keep the plan at the premises to which the environment protection licence relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO (G) Regulation (clause 98E).
- if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act)

3. DEFINITION OF 'POLLUTION INCIDENT'

The 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."

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.

Arumpo Bentonite is required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

4. SCOPE

This PIRMP must be followed by employees, contractors and visitors of Arumpo Bentonite, to assist in the early response to and reporting of a pollution incident.

5. POTENTIAL POLLUTING SUBSTANCES

The main hazards to human health and the environment at Arumpo Bentonite are included in the following table.

						Responsible Person:	Date:
Arumpo Mine S	ite					Mine Manager	20/01/2020
Name /	Covered under	Amount	Location of	Мар	Need for	Current controls	See Risk Ass &
description	Haz	stored	storage	reference	early		PIRMP Response
	Chemicals/MSDS?				warning ¹		Action (see Below)
CHEMICALS/FU	ELS/LUBRICANTS (raw n	naterials and	products which	can cause po	llution)		
Diesel	Class 3	18 000 ltrs	Diesel Storage Area	Ref No #1	N/A	 Bunding PMP Training Spill Kits/Bentonite SOP Inductions Fire extinguishers 	Incident #1-2

Class 3	Packaged goods up to 600ltrs	Oil Storage At laydown	Ref No #2	N/A	 Bunding PMP Training Flammable	Incident #3
Class 2	Variable	Maintenance Workshop	Ref No [#] 2	N/A	Fire Extinguishersopen area	Incident #3
					 Containment Cages and Cabinets 	
Class 3	Variable	Plant and Equipment (Workshop area)	Ref No #2	N/A	 PMP Training Spill Kits SOP Inductions Fire Fighting Equipment 	Incident #3
			T	_		
N/A	Variable	Dedicated on site	Ref No #8 & #9	N/A	 Maintain manageable levels 	Incident [#] 4
	Class 2	Class 2 Variable Class 3 Variable tockpiles, drying beds)	Class 2 Variable Maintenance Workshop Class 3 Variable Plant and Equipment (Workshop area) tockpiles, drying beds) N/A Variable Dedicated	Class 2 Variable Maintenance Workshop Ref No *2 Class 3 Variable Plant and Equipment (Workshop area) Ref No *2 Ref No *2 Ref No *4 Ref No *8	Class 2 Variable Maintenance Workshop Ref No #2 N/A Class 3 Variable Plant and Equipment (Workshop area) Ref No #2 N/A Ref No #2 N/A	At laydown PMP Training Flammable Cabinet Spill Kits/Bentonite Inductions Fire extinguishers

Storm Water	N/A	Variable	Site	N/A	N/A	• Straw Bales Incident #6
Drains						Rubber and
						Earthen Berms
						Audits and
						Inspections
SUBSTANCES IN PR	ROCESSES (substances	s which could	be emitted from	n operational	process i.e. trea	tment plants, vehicles etc)

Name /	Covered under	Amount	Location of	Мар	Need for	Current cont
description	Haz	stored	storage	reference	early	
	Chemicals/MSDS?				warning ²	
Mobile Plant	Class 3	Up to 10	Dedicated	N/A	N/A	• Spill
(onsite		on site	on site			• Pres
						• PMP
						• Trair
Car Parking up to	Class 3	Variable	Site Office	Ref No #4	N/A	• Spill
10 vehicles						• Trair
Traffic Areas	Class 3	N/A	Dedicated	N/A	N/A	• Trair
(dust, chem.			on site			• Wate
leaks & loss						• Spill

6. ROLES AND RESPONSIBILITIES

Position	Responsibility
Employees and Contractors	Following the procedures outlined in the PIRMP and related documents
	Immediately alerting Supervisor or Team Leader of any environmental incidents or near-misses.

Contractor Manager	Following the procedures outlined in the PIRMP and related documents Immediately alerting Mine Manager or, in case of their unavailability, Chief Executive Officer of any potentially material environmental incidents or near-misses. Conducting incident investigations.
Mine Manager and/or Chief Executive Officer	Authorisation of the PIRMP Administration, maintenance and implementation of the PIRMP Assessing whether the incident has caused or threatens "material environmental harm" and, if so, immediately notifying all Appropriate Regulatory Authorities. Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact.

7. INTERNAL POLLUTION INCIDENT REPORTING

Any pollution incident satisfying the *material harm* threshold must be immediately reported to relevant statutory authorities by either the Mine Manager, or Chief Executive Officer.

In cases where material harm level cannot be immediately assessed or insufficient information comes to hand on the severity of the incident, the general advice is to err on the side of caution and notify the Relevant Authorities with a qualification that the situation could not yet be fully assessed.

Until further notice the following procedure needs to be followed:

- When a pollution incident occurs, a person who has become aware of it must immediately bring it to the attention of his/her immediate Supervisor or Manager
- 2. If necessary, first ring 000 for Emergency Services
- 3 At least one of the following Arumpo Bentonite personnel must be contacted **immediately**:

Name	Function	Phone number	Mobile number
Greg Brown	Mine Manager Arumpo Bentonite		0407 210 744
Jim Blackburn	C.E.O. Arumpo Bentonite		0401 892 103

- 4. Greg Brown, or in case of his unavailability Jim Blackburn, is to **immediately** notify all Appropriate Regulatory Authorities specified in Section 9.
- 5. In situations, where the exceedance of the trigger level of "material harm" of a pollution incident may not be clear, a quick assessment including consultation with Mine Site Contractor personnel should be undertaken to help the decision whether to notify or not.

6. Arumpo Bentonite Senior Management must be informed promptly of the incident to allow immediate notification to the Authorities. The Mining Contractor must not notify any Agency of an Incident occurring on the Mine Site.

8. EXTERNAL POLLUTION INCIDENT REPORTING

The initial notification should include as much of the following information (if known) as possible:

- Location and time of the pollution incident
- Type of the incident
- Assessed level of incident
- Whether the Emergency Services have been required to attend.

The Arumpo Bentonite Mine Manager or Chief Executive Officer must prepare a Notification Log (a suitable form is attached) with the details of time of notifications and the persons who took to the call. The Authorities are expected to log the calls but early indications are that this is not always the case.

Notification of all Appropriate Government Authorities (at least 5 entities) may take considerable time. Delays may be experienced connecting to the right person or no contact may be possible after hours. All such instances should be recorded in the Notification Log.

9. POLLUTION INCIDENT AUTHORITY CONTACT LIST

Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire & Rescue NSW (FRNSW)	1300 729 579
Wentworth Shire Council	03 5027 5027
WorkCover Authority of NSW	131050 Company ABN asked: 77 001 831 483
Government Authority - ring if relevant	Emergency notification phone number
Police & Ambulance	000
Roads and Maritime Services (road spills)	132 701
Poisons Information Centre	131 126

Communication with the Land Owner may also be undertaken depending on the circumstances of the pollution incident. Arumpo Bentonite would consider the following options for providing Early Warning and ongoing information to the community on pollution incidents:

• direct phone contact or in person with any local residents directly impacted by the pollution incident

10. INCIDENT RESPONSE TRAINING

Arumpo Bentonite will implement the Pollution Incident Response Management Plan by training or providing information to relevant employees and contractors in relevant areas of the Plan.

Training or information will be provided on the following;

- the contents and intent of this PIRMP,
- the roles and responsibilities of site staff in relation to this PIRMP
- Spill response procedures;
- General environmental awareness; and / or
- Hazardous materials awareness.

11. PIRMP AUDIT

The objectives of an audit are to maintain compliance with this plan. Internal audits of this Plan will be undertaken every 2 years.

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

- Simulated environmental emergency, or
- Desktop simulations.

12. PIRMP REVIEW

Revisions are to be coordinated by the Mine Manager.

The objectives of a review are:

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

12.1. EVENT BASED

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

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

12.2. TIME BASED

Arumpo Bentonite will review this management plan routinely every 12 months. The Plan review will include:

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

APPENDIX 1.

RISK ASSESSMENT on POTENTIAL IMPACTS

		Hazard	and Lik	kelihoo	od Risk Ass	essment and Corrective Cor	ntrol Measures			
Site: Mine					ponsible P		Reviewed Date: 20 Jan 2020			
Name / ref of pollutant/ chemicals	Description of Hazard / Incident leading to hazard	Conseq uence	Likely hood	Risk	Impact on neighbours ³	Control Mea Corrective A Coverage under c	Responsible person	Action date		
Diesel	Incident #1 Catastrophic failure of mobile diesel tank	2	1	L	N/A	Consequence: (minor): Failure resulting in loss of all or substantial volume of the tank would be captured entirely by existing primary bund with no release to soil or water. Likelihood: (unlikely): Due to location of tank damage to tanks is unlikely to occur from external equipment. In addition tanks are maintained in good structural integrity with low risk of failure through corrosion.		As per PIRMP action plan	When required	
	Incident #2 Loss of diesel outside bund during refuelling/fuelling operations.	2	2	L	N/A	Consequence: (minor): Failure resulting in fuelling from hose, nozzle or plant/equipm bunded fill point or spill kill with minimal relikelihood: (unlikely): An incident while reoccur on limited occasions. Hoses and refu with low risk of failure.	eent would be captured by a self elease to soil. -fuelling and fuelling is likely to	As per PIRMP action plan	When required	

Oils/Solvents	Incident #3 Loss of oils solvents inside bund during delivery and or use	1	2	L	N/A	Consequence: (incidental): Failure resulting in loss of oils/solvents from Packaged goods would be captured entirely by existing primary bund with no release to soil or water. Likelihood: (unlikely): Due to location within the bund, spillage during delivery and use is unlikely to occur. In addition hoses and decanting equipment are maintained in good structural integrity with low risk of failure.	As per PIRMP action plan	When required
Product stockpiles	Incident #4. Excessive airbourne dust from stockpiled material	1	2	L	Y	Consequence: (incidental): Excessive dust from stockpile during high winds causing nuisance to surrounding area. Likelihood: (unlikely): Stockpiles are maintained to a manageable levels	As per PIRMP action plan	When required
Sediment Dams	Incident #5 Catastrophic failure of one or more sediment dams releasing large volumes of water into on-site and off- site water courses (i.e creek).	1	2	L	N/A	Consequence: (incidental): Catastrophic failure of one or more sediment dams are likely to result in off-site impacts to water courses which would predominantly reduce water quality over a short period of time. As such, impact to the environment/human health is not considered to be significant. Likelihood: (unlikely): Dams are frequently monitored and inspected for levels and integrity. Note: For PIRMP purposes overflow events during extreme wet weather will be reported under POEO Licence obligations and not Immediate Reporting.	As per PIRMP action plan	When required
Mobile Plant	Incident #6 Mobile plant, hydraulic hose or fuel tank failure	1	2	L	N	Consequence: (incidental): Failure from fuel tank or hydraulic hoses would be maintain to a small localised area on site. Likelihood: (unlikely): Hose or fuel tank failure from mobile plant would be minimal as prestart and regular maintenance programs are in place to capture and prevent such occurrences. Spills kits also maintain and available in various areas.		When required

Car Park	Incident #7	1	2	L	N	Consequence: (incidental): Failure from fuel tank or hydraulic hoses would be	As per	When
	Ruptured fuel tank					maintain to a small localised area on site.	PIRMP	required
							action plan	
						Likelihood: (unlikely): Hose or fuel tank failure from employee or visitor		
						car would be minimal. Car park area is fully sealed. Spill kits also maintain		
						and available in various areas		
Traffic areas	Incident # 8	1	2	L	Υ	Consequence: (incidental): Dust created form continuous mobile	As per	When
(dust)	Surface dust from					plant operations across site	PIRMP	required
	mobile plant						action plan	
						Likelihood: (unlikely): Main areas watered with water cart in high		
						wind conditions		

APPENDIX 2.

PIRMP RESPONSE ACTIONS

Incident #1	Catastrophic failure of diesel tanks.
	Actions Required:
	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
	Ensure bunds are capturing full volume of diesel
	Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections)
	Area to be restricted to Incident Response Personnel
	Ensure spill kit available for any release from bund
	 If any release from bund onto unsealed soil/surface water - Environmental Consultants to be engaged to investigate and remediate contamination.
	Repair/replace tanks
	Refuel tanks
	Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Mine Manager or Contractor Manager
Controller	Spill Kit (Designated Operator)- Bentonite
	Periodic inspections and update reporting of site and bund (Mine Manager or Contractor Manager)
Scale of incident	Incident would be restricted to Diesel storage area with minimal external impact, bund overflow or failure may result in soil contamination
	that will require investigation/soil removal.
Evacuate	Only if fire or explosion potential exists.
Communications	Internal:
	Mine Manager
	Incident report
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan.
Aid	
Clean up and	Mining Contractor to dispose of diesel and contaminated soil.
Waste disposal	
Reporting and	Incident Notification and review of PIRMP
re-preparedness	

Incident #2	Loss of Fuel due to filling and refuelling from mobile diesel tank.					
	Actions Required:					
	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)					
	Ensure bunds are capturing full volume of diesel					
	 Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) 					
	Area to be restricted to Incident Response Personnel					
	Ensure spill kit/bentonite available for any release from bund					
	Remove contaminated material to waste facility					
	Repair/replace tanks					
	Refuel tanks					
Alarm raising	Inspect bund for ongoing serviceability Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.					
Emergency						
Controller	 Mine Manager or Contract Manager Spill Kit (Operator) 					
Controller	 Spill Kit (Operator) Periodic inspections and update reporting of site and bund (Mine Manager or Contractor Manager 					
Scale of incident	Incident would be restricted to Diesel area with minimal external impact with minor soil contamination that will require removal.					
Evacuate	Only if fire or explosion potential exists.					
Communications	Internal:					
	Mine Manager					
	External mandatory:					
	Immediate Reporting Contact Sheet to be used					
	External non-mandatory: N/A					
Rescuer /	As per Site Emergency Plan.					
respondent +						
safety checks						
Rescue + First	As per Site Emergency Plan.					
Aid						
Clean up and	Mining Contractor to dispose of diesel and advise on required clean-up.					
Waste disposal						
Reporting and	Incident Notification and review of PIRMP.					
re-preparedness						

Incident #4	Loss off oil/solvents, packaged goods. Actions Required: Contact all relevant people/department (refer to Immediate Reporting Contact Sheet) Ensure bunds are capturing full volume of oil/solvents Ensure bund integrity is sound throughout the entire period of incident (i.e. periodic inspections) Area to be restricted to Incident Response Personnel Ensure spill kit/ bentonite available for any release from bund If any release from bund onto unsealed soil remove to waste facility. Inspect bund for ongoing serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency Controller	 Mine Manager or Contract Manager Spill Kit (Operator) Periodic inspections and update reporting of site and bund (Mine Manager or Contractor Manager
Scale of incident	Incident would be restricted to Oil/Solvent area with minimal external impact with minor soil contamination that will require removal.
Evacuate	Only if fire or explosion potential exists.
Communications	Internal: • Mine Manager External mandatory: • Immediate Reporting Contact Sheet to be used External non-mandatory: N/A
Rescuer / respondent + safety checks	As per Site Emergency Plan.
Rescue + First	As per Site Emergency Plan.
Clean up and Waste disposal	Mining Contractor to dispose of diesel, oil, grease and advise on required clean-up.
Reporting and re-preparedness	Incident Notification and review of PIRMP.

Incident #5	Excessive airborne dust from stockpiled material.
iliciaelii 3	Actions Required:
	Restrict activities
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Mine Manager or Contractor Manager
Controller	
Scale of incident	Incident would be localised with minimal or no external impact.
Evacuate	Only if vision impaired
Communications	Internal:
	Mine Manager or Contractor Manager
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan.
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan.
Aid	
Clean up and	N/A
Waste disposal	
Reporting and	Incident Notification
re-preparedness	

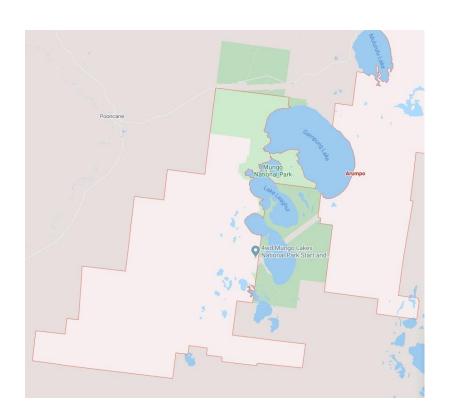
Incident #7	Mobile plant, hydraulic hose, or fuel tank failure.
	Actions Required:
	Call service provider to inspect plant & equipment for serviceability
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Quarry Supervisor
Controller	Call service provider (Supervisor)
	Spill Kit manager (Supervisor)
	 Periodic inspections and update reporting of site and bund (Quarry Supervisor)
Scale of incident	Incident would be localised to the area with no external impact.
Evacuate	Only if fire or explosion potential exists. Quarry Manager and any advice provided by Fire Dept as part of attendance after immediate notification.
Communications	Internal:
Rescuer /	As per Site Emergency Plan
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan.
Clean up and	Mining Contractor to dispose of diesel and advise on required clean-up.
Waste disposal	
Reporting and	Contact all relevant people/department (refer to Immediate Reporting Contact Sheet)
re-preparedness	Area to be restricted to Incident Response Personnel
[[Ensure spill kit available for any release from mobile plant & equipment
	Used spill kit absorbent pads to be stored in designated spill bags for correct disposal
	 If any release from mobile plant onto unsealed soil/surface water is investigated and remediated immediately

Incident #9	Car Park/ fuel tank failure.

	Actions Required:
	Contractor/Visitor to notify site representative of issue immediately. (induction)
	Area to be restricted to Incident Response Personnel
	Ensure spill kit/ bentonite
	If any release from mobile plant onto soil investigate and remediated immediately
Alarm raising	Any personnel involved or witnessing incident to report to immediate supervisor and PIRMP actions to be implemented.
Emergency	Mine Manager or Contractor Manager
Controller	Spill Kit (Operator)
Scale of incident	Incident would be localised to the area with no external impact.
Evacuate	Only if fire or explosion potential exists.
Communications	Internal:
	Quarry Manager
	External mandatory:
	Immediate Reporting Contact Sheet to be used
	External non-mandatory: N/A
Rescuer /	As per Site Emergency Plan.
respondent +	
safety checks	
Rescue + First	As per Site Emergency Plan.
Aid	
Clean up and	Mining Contractor to dispose of contaminate
Waste disposal	
Reporting and	Incident Notification
re-preparedness	

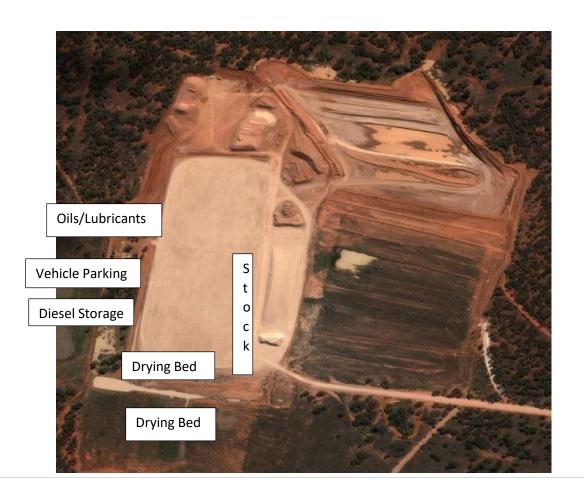
APPENDIX 3.

ARUMPO MINE SITE LOCATION MAP



APPENDIX 4.

ARUMPO BENTONITE MINE SITE REFERENCE MAP



APPENDIX 5.

ARUMPO BENTONITE – MAP OF AFFECTED AREAS



APPENDIX 5.

POLLUTION INCIDENT NOTIFICATION LOG

Person undertaking (Name/Function):	notification			
Date and time wher incident:	ı first become av	ware of the		
Incident type:				
Comments:				
Initial immediate no	otification log			
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Fire and Rescue NSW				
Local Council				
WorkCover				
Other:				
Other:				
Summary of initial c	ommunication:			
İ				

Person undertaking notification (Name/Function):							
Date and time when additional information become available:							
Comments:							
Immediate notificat	tion of further p	ertinent informa	tion (if applicable)	1			
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments			
EPA							
Public Health Unit							
Fire and Rescue NSW							
Local Council							
WorkCover							
Other:							
Other:							
Summary of addition	nal communicat	ion					

ARUMPO BENTONITE MINE SITE

PIRMP- Immediate Reporting Contact Sheet

INTERNAL NOTIFICATIONS						
Name Function Phone number Mobile num						
Greg Brown	Mine Manager		0407 210744			
Jim Blackburn	C.E.O.		0407 881 075			

EXTERNAL NOTIFICATIONS	
Government Authority - compulsory notifications	Emergency notification phone number
EPA – Environment Line	131 555
Fire & Rescue NSW (FRNSW)	1300 729 579
Wentworth Shire Council	03 5027 5027
WorkCover Authority of NSW	131050 Company ABN asked: 51 000 187 002

NOTE: A full listing of contact phone numbers of other potentially relevant government agencies is included in the PIRMP.