Pollution Incident Response Management and Reporting Plan

This Pollution Incident Response Management Plan has been prepared for the Botany Rail Duplication Project operating under EPL 21678. It has been prepared in accordance with Part 5.7A of the Protection of the Environment Operations Act 1997 and Chapter 4 of the Protection of the Environment Operations (General) Regulations 2022.

1. External Notification Protocol

The authorities listed in Table 1.1 must be contacted in the order below. Also refer to Table 2.1.

Table 1.1: Contact Details

	Authority	Name	Phone Number
1	Emergency Services	Fire and Rescue NSW Police NSW Ambulance	000
* Only ring 000 if the incident presents an immediate threat to human health or property and requires Emergency Services. If the incident does not require an initial combat agency or once the 000 call has been made.			
2	EPA	Pollution Line	131 555
3	Ministry of Health	South East Sydney	02 9382 8333 After hours 02 9382 2222
4	Comcare		1300 366 979
5	SafeWork NSW	Information Line	131 050
6	Bayside Council	Customer Contact Centre	1300 581 299

Refer to Attachment A Emergency Contact List for site personnel contact details

2. Community Notification and Action Protocol

The following table (Table 2.1) lists the mechanisms to be followed in the event that a pollution incident has the potential to impact the surrounding community, in order to minimise the risk of harm.

Table 2.1: Incident Notification

Pollution Incident Scenario	Potential Impacts	What to do	Who to Notify	When	Communication Mechanism
Large release of sediment from site	Siltation of Watercourse	Avoid entering the watercourse. Cease pumping any water	Principal	Principal within 15mins	Notification e.g. Door knock/ Telephone/ Letter drop
			Downstream users	3 hours When water has been removed	
Chemical spill entering drain	Exposure to chemicals	Avoid entering drain Don't drink any water originating from drain	Principal	Principal within 15 mins	Notification e.g. Door knock/ Telephone/ Letter drop
			Adjacent residents/ businesses	3 hours When cleaned up	

Communications and engagement activities, tools and implementation, enquiries, and complaints mechanisms to notify the community are set out in the BRD Communication Strategy.

3. Hazard Identification and Pre-emptive Measures

The management plans associated with the CEMP identify environmental aspects associated with the construction of the Project. The CEMP sub-plans and Environmental Control Plans relevant to pollution include Soil and Water Management Plan, Waste Management Control Plan, Air Quality Control Plan and Construction Noise and Vibration Management Plan.

Refer to Appendix C of the CEMP for complete hazard identification and risk assessment.

A project wide risk assessment is incorporated into the Workplace Risk Assessment stored on Project Pack Web (PPW).

4. Pollution Inventory

The Work, Health and Safety (WHS) Management Plan requires that a Safety Data Sheet (SDS) and a Hazardous and Dangerous Substances Register be kept for all chemical storage and handling on the Project. The location of pollutants to be stored/held on-site shall be identified in the Register which can be accessed via PPW and is available on sharepoint. Main pollutants on-site are sediment laden water, piling polymer and fuel.

5. Safety Equipment

A list of pre-emptive actions (or mitigation measures) to be implemented during construction of the Project to minimise or prevent the risks to human health and the environment is outlined within Attachment B as well as in the project's WHS Management Plan, AMS documents, Safety Data Sheets (SDS) and CEMP documentation. These documents include a description of safety equipment and activity-specific equipment required to address specific hazards, risks, and safety issues. For example, spill kits will also be available on-site for all personnel to use with locations identified in the Site Environmental Plans for each worksite.

6. Maps

Maps showing the location of the premises, the surrounding areas that are likely to be affected by a pollution incident, the location of the potential pollutants on the premises, the location of any stormwater drains on the premises, and the nearest watercourse or water body have been developed (and continually updated with the works) within the SEPs, ESCPs, CEMP and associated sub-plans.

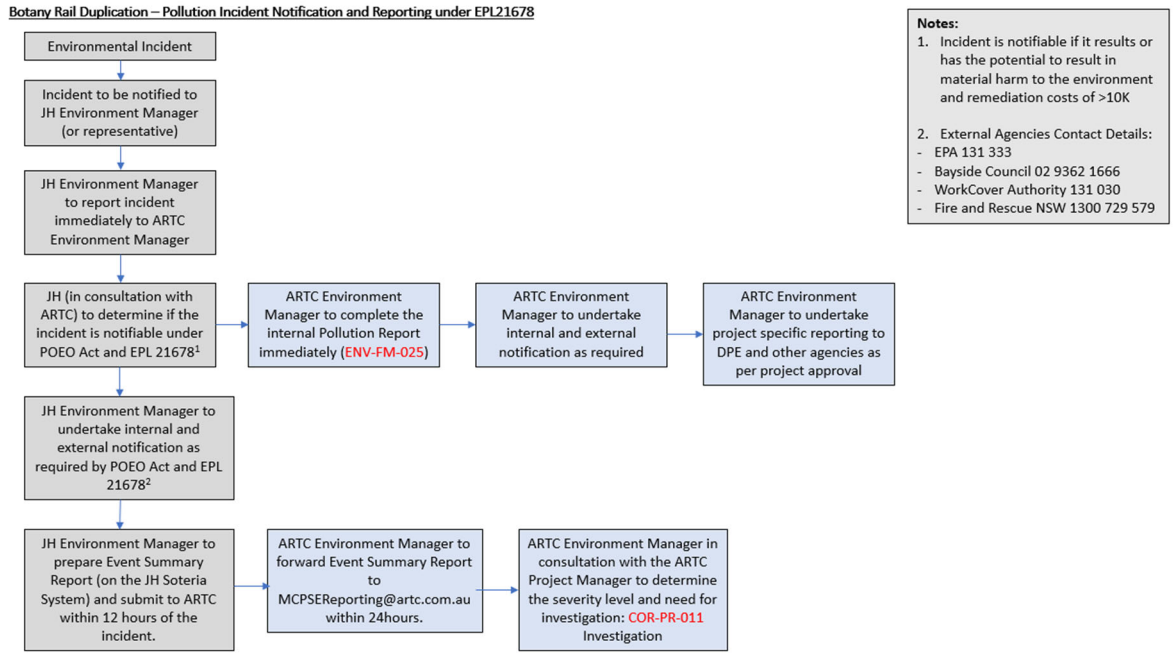
7. Training

Several forms of environmental training will be provided on the project, examples include:

- A project site induction, including environmental roles and responsibilities.
- Toolbox talks
- Environmental Work Method Statements; and
- Environmental awareness training for specific issues

The Environmental Lead (or delegate) will undertake training and a register will be maintained by the Project HSEQ Administrator of all project site inductions and training carried out.

8. Pollution Incident Management and Notification



9. Pollution Incident Response Scenarios

Pollution incident response scenarios are detailed in Attachment C as follows:

A. Spills or Releases
   - Oils and Greases
   - Turbid/Contaminated/Untreated Water
   - Fuel, Oil and Leachate
   - Dangerous Goods

B. Adverse Weather

10. Testing and Review

The testing of this plan shall be carried out in such a manner as to ensure that the information included in this plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner. Any such test is to be carried out:

- Routinely at least once every 12 months, and
- 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.

In accordance with the Regulation, testing of this PIRMP will occur:

- Initially within three months after EPL 21678 approval
- Every 12 months thereafter, while construction continues; and
- Within 1 month of any Category One pollution incident during the construction of the Project.

Testing of the PIRMP will involve:

- Desktop simulation; or
- Practical implementation or drill

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Records will be kept in accordance with the EPL Guideline. Refer to Attachment D for the Testing Control Records.

11. Hazard Identification

The main potential hazards associated with the BRD work activities are detailed in Table 11.1.

Table 11.1 Hazard Identification

Aspect	Hazards
Soil and Water	The Construction Soil and Water Management Plan details hazards to soil and water. Hazards include: - Refuelling - Earthworks increasing the risk of erosion and sedimentation - Storage of fuel and chemicals - Tree clearing, topsoil stripping and soil disturbance - Ground and surface water contamination
Waste	The Waste Management Control Plan (CEMP Appendix D) details hazards associated with waste. Hazards include: - Demolition wastes - Excavation wastes - Contaminated soils - Soils, general construction material and capping material - Liquid hazardous waste - General solid waste - Non-recyclable and other putrescible general solid waste - Fuels, oils, greases - Concrete slurries, drilling muds - Adhesives, lubricants, cleaning agencies, absorbent materials, water treatment chemicals, plastic materials - Concrete, aggregate, asphalt, metallic materials, cables, timber framework
Air Quality	The Air Quality Control Plan (CEMP Appendix D) details hazards associated with air. Hazards include: - Dust emissions - Particulate emissions
Noise and Vibration	The Construction Noise and Vibration Management Plan details hazards associated with noise and vibration. Hazards include: - Undertaking works outside approved construction hours - Works exceeding noise management levels - Work not in accordance with EPL 21678 - Vibration from project activities impacting surrounding heritage and other built structures.

Attachment A: Emergency Contact List

Emergency Contacts	Telephone Number	Local Contact
Ambulance	000 or 112 from mobiles	N/A
Fire	000 or 112 from mobiles	(02) 9667 3837 (Mascot) (02) 9666 5440 (Botany)
Police	000 or 112 from mobiles	(02) 8338 7399 (Mascot)
Comcare/SafeWork NSW	1300 336 979 / 131 050	N/A
Poisons Information Centre	131 126	N/A
Employee Assistance Program (EAP)	1800 991 151	N/A
EPA Pollution Line	131 555	N/A
IMMEX – Medical Centre	(02) 9319 5999	Call before attending
Mascot Medical and Dental	(02) 9317 4222	Call before attending
Royal Prince Alfred Hospital	(02) 9515 6111	N/A
Prince of Wales Hospital – Randwick	(02) 9650 4000	N/A
Water (water or sewer main)	132 092	N/A
Telstra – Damaged Cables	132 203	N/A
Telstra – Underground Services	1100/1800 653 935	N/A
Energy Australia (Electricity)	131 388	N/A
Jemina Gas	1300 880 906	N/A
ARTC Train Transit Manager Emergency Number	(02) 6924 9869	N/A
ARTC Network Controller	(02) 6924 9866	N/A
Office of National Rail Safety Regulator (ONRSR)	1800 572 077	N/A
Airport Emergency	(02) 9667 9090	
Site Personnel	**Contact Number**	**Contact Name**
Project Director	0437 475 070	Paul Dalziel
Construction Manager	0417 984 132	Jarod Wakefield
Superintendent	0418 790 167	Neil Campbell
Safety Manager	0437 477 911	Mark Baranowski
Environmental Manager	0439 464 796	Rachael Labruyere
Community Manager	0412 129 064	Loretta Mihaljek
Quality Manager	0477 291 805	Angela Phelan
Zones 1 & 2 Area Manager	0417 475 349	Chalana Hewage
Zones 3, 4 & 5 Area Manager	0439 036 804	Loui Tannous

Attachment B: Risk Assessment

A risk assessment has been carried out for the Hazards identified in Section 11 of this Plan and presented in Table 3 below. The risk rating for inherited risk level and residue risk level were based on a likelihood and consequence risk matrix detailed in Figure 1,Table 1 and 2 below.

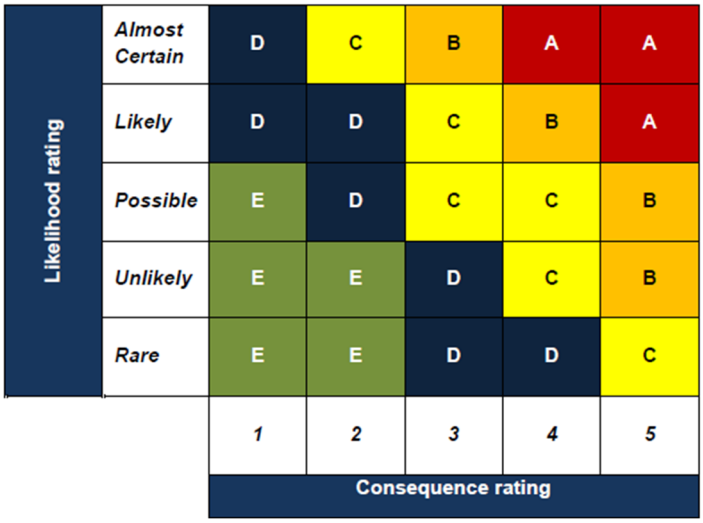

Figure 1: Risk Matrix

Table 1: Likelihood Rating

Rating	Criteria
Almost Certain	>99% probability, or Expected to occur in most circumstances, or Could occur within 'days to weeks', or Will occur repeatedly without corrective action being taken
Likely	50-99% probability, or Will probably occur in most circumstances, or Could occur within 'weeks to months'
Possible	20-50% probability, or Might occur sometime, or Could occur within 'months to years'
Unlikely	1-20% probability, or Could occur but would not be expected, or Could occur in 'years to decades'
Rare	<1% probability, or Occurrence requires exceptional circumstances, or Only occur as a '100 year event'

Table 2: Consequences Rating

Rating		Criteria
1	Insignificant	Not affected
2	Minor	Minor impacts
3	Moderate	Moderate damage including local ecosystems. Some remedial action may be required
4	Major	Significant damage. Remedial action likely
5	Catastrophic	Extreme damage, including loss of species, habitats or ecosystems. Extensive remedial action likely.

Table 3: Risk Assessment

Key Hazards	Inherited Risk Level	Pre-Emptive Actions	Residual Risk Level
Contamination of soils and groundwater due to hydrocarbon / chemical spills from plant or refuelling / fuel storage	D	Spill kits to be made available on site to prevent material entering the watercourse or surface water drains. Tanks, bunds, plant, and machinery to be regularly maintained. Emergency spill response training. Appropriate storage and management of chemicals. Refuelling and wash-down in designated areas only. ECM identifying fuel storage, spill kits and refuelling locations	E
Sediment laden water leaving the site.	D	Dewatering procedures Sediment basins Progress earthworks in conjunction with establishment of ERSED controls	E
Pollution of land or water from chemical and hazardous waste, contaminated soil, concrete waste	D	Establish concrete waste area and concrete washout, location show on ECM. Establish waste material management process Identify designated waste storage locations on ECM	E
Impacts on air quality as a result of emissions from mobile plant / vehicles and exposed areas	D	Truck to cover loads Air Quality, Odour, and gas monitoring programs Dust suppression (e.g., water carts and stabilisers/soil binder) Minimise exposed surfaces and stage works to minimise disturbed areas.	E
Impacts to local receivers due to noise and vibration	C	Noise and Vibration monitoring Out of hours procedures and planning Comply to approved construction hours and out of hours work permits Communicate with the local community on out of hours works and general project activity updates/notifications Program high noise activities for standard construction hours and apply respite periods as required.	D

Note: This is not an exhaustive list of pre-emptive actions. For further information refer to the relevant section of the Construction Environmental Management Plan and Workplace Risk Assessment

Attachment C – Spill/Release

Note: Ensure the safety of yourself and others prior to or when carrying out spillage/release recovery

Actions during the Emergency

1. Identify type of spill/release	Is it contained (e.g. bunded) or uncontained (going to escape or drain)? Damaged/leaking containers should be addressed using the same process.
2. Identify the material	Is it flammable, toxic, corrosive, etc.? Refer to label, signage, MSDS.
3. Conduct risk assessment	Is the area safe, have you been trained, is it going to escape/drain?
4. Wear appropriate PPE	Gloves, goggles, apron, respirator, etc. in accordance with the MSDS.
5. Eliminate ignition sources	For flammable substances (or assumed flammable substances) remove energy supply to nearby switchboards, electrical equipment, power points and flames, static or sparks (this includes mobile phones and radios).
6. Take precautions	Avoid slipping, creating sparks, or breathing in vapours
7. Contain the spill/release	If safe to do so use containment booms or drain seal mats to prevent runoff to storm water drains of liquids.
8. Clean-Up	Use pads, pillows, and other absorbent material to soak up spill and then bag in labelled containers. Flush any residue off surfaces
9. Notify	Report spill or release to area supervisor, Environment Manager (or representative) and ARTC. Complete the Incident Notification and Investigation Report through the Soteria system.

Note: Particular attention should be paid to drains/water courses, potential ignition sources which could cause fire and explosions (buried gas pipes). Liquid spills may need to be dammed using appropriate bunding

Important – Notification to Fire Brigade

- Th Fire Brigade HAZMAT Team is to be notified immediately for any hazardous substance spill beyond control of the Project. This call should be made via ‘000’
- The Fire Brigade should also be informed via a ‘000’ call if the spillage or release has caused evacuation, entered drainage systems or is a size or nature that Site personnel have insufficient resources or training to safely and effectively manage.
- All information regarding the spill should be reported to the Officer-In-Charge of the Fire Brigade on arrival at the scene.

Actions during the Emergency

- Prevent unauthorised access to the area
- Consideration should be given to site environmental conditions and a decision made as to whether further evacuation of the area is required. Consider potential flammable atmosphere and radius when determining evacuation (this assessment needs to include nearby stakeholders and residents)
- Ensure that persons assemble in a well-ventilated, safe area, upwind from the spill/release
- Considerations, instructions and advice relating to specific spill types must be followed for the safety of colleagues, other persons and the environment

Oil and Grease Considerations:

- Stop the leak at the source
- Determine the type and size of the spill
- Protect storm water drains by forming barriers or blocking them
- Prevent any runoff into storm water drains - use the containment booms, located in the spill prevention kits, to confine small spillages (up to 200L).
- Spills that cause or potentially threaten material harm must be notified to the relevant authorities
- Spills of 1000 litres or more must be reported to the JH Regional HSEQ Manager
- Wear personnel protective equipment (PPE) located in the spill prevention kits to prevent skin and eye contamination and to avoid breathing any vapor. PPE includes overalls, splash apron, eye goggles, gloves (PVC or neoprene), footwear, and appropriate breathing apparatus.
- Clean up method will be dictated by the quantity spilled
- Emergency (Teflon pneumatic) pump for pumping out drains and holding pits. Spilled material must be pumped into approved (degassed), sealed, and labelled 200L steel drums
- Cleaning equipment (mops, squeegees etc.) for directing liquid spills into the bund or holding pits
- Spill response kits for absorbing minor spills
- Ensure that the spill area has been appropriately cleaned, and is no longer a hazard.

Turbid/ Contaminated or Untreated Water

- Inform Supervisor of problem, /exact location and the estimated volume magnitude
- Notify the JH Environment Manager
- Divert flow away from existing waterways
- Create barriers and block any storm water drains
- Contain the spill by forming a barrier around the affected area. Establish emergency berm (earth or sandbags) to contain trap storm water/sediment laden water or reduce flow. Where possible turbid/sediment laden divert dirty water to suitably sized operational sediment control point or basin device.
- Work on the source control / restoration of original control device e.g. tank, embankment. basin
- Assess impact and devise remedial action for affected waterway and embankment
- Apply buffering solutions/agents or pump out if necessary
- Remove sediment build-up deposit

Fuel, Oil & Leachate Spill Considerations into Mill Pond:

- If a spill occurs over or next to water stop work immediately, supervisor to direct crew in the prevention of further personal and environmental harm where possible (i.e. stop any leaks)
- Marine spill kits to be readily available at Mill Pond and site personnel trained in their use.
- Collect water samples from the spill location for further analysis
- Dispose of all contaminated waste via correct procedures and at waste facility licensed to accept contaminated waste
- Project Manager to contact the JH Environmental Manager who will contact the ARTC Environmental Manager and any other regulatory agencies in line with this procedure.

Dangerous Goods

- Identify the class of dangerous good (as described below) and the inherent dangerous physical property of that class (refer to product MSDS)
- Control the identified danger or anything that might increase the exposure to that danger
- Respond to the spill as per action steps outlined under Oils and Greases considerations

Storm / Severe Weather – General Guidelines

- If strong winds are anticipated, ensure that any objects that could become airborne in strong wind gusts and cause damage are brought under cover and (where possible) secured with on-site stockpiles covered
- If torrential rain is likely, ensure that ERSED controls are in place and materials on-site secured
- If a severe electrical storm are anticipated, review safety precautions concerning critical processes or outdoor work activity (staff and contractors) with applicable specialist personnel caution persons concerning use of electrical equipment such as phones and computers. Monitor passage of storm cell/s and temporarily suspend outdoor movement if risk of lightning strike
- Consult with Project Superintendent and determine if works areas need to be shut down or high risk activities are to be suspended.

Attachment D: Testing Control Records

Date	Description	Conducted by	Records
07/05/2022	Noise and Vibration – Plant/equipment/activity missing from an Out of Hours Assessment	Rachael Labruyere (Environment Manager)	Incident records and report. INC91854 Soteria. Updated OOH Assessment Root Cause Assessment including review by AA
24/02/2023	Pollution – Release into waterway	Rachael Labruyere (Environment Manager)	Incident records and report INC96195 Soteria R3 report/Root Cause Analysis

Attachment E: John Holland Event Notification and Reporting Matrix