

Pollution Incident Response Management Plan

Googong Township IWC Project: Stage AB - WRP
November 2013

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Quality control

Our reference	12083
Version number	3.0
Date	29 November 2013
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1 Introduction

1.1 Background

The *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) has introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community. This includes a new requirement (under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act)) for holders of Environment Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

Googong Township Pty Ltd (GTPL) has obtained EPL (No. 20188) to allow for the construction of the Stage AB Water Recycling Plant (WRP) (refer Appendix A) and under Section 153A of the POEO Act are required to prepare and implement a PIRMP. Copies of the EPL and PIRMP must be held on site.

1.2 Purpose and objectives

This PIRMP (or Plan) has been developed for the construction of Stage AB WRP, as part of the Googong Township Integrated Water Cycle (IWC) Project and should be read in conjunction with the Construction Environment Management Plan (CEMP).

The Stage AB WRP CEMP is the key document in the Environmental Management System (EMS) for construction works and is required as per the IWC Project Condition of Approval (CoA) C19 and C20. The EMS structure, which includes this PIRMP is outlined in Figure 1 and described in more detail in Section 1.6 of Stage AB WRP CEMP.

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection A and other relevant authorities specified in the POEO Act (such as local councils, NSW Ministry for Health, WorkCover NSW, and Fire and Rescue NSW), and people outside the project who might be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident associated with the construction of the project by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP 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.

Unless otherwise identified, the contractors will be responsible for the review and implementation of this Plan and related environmental documents based on detailed construction information.

1.3 Definition of 'pollution incident'

The POEO Act defines a pollution incident as:

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.

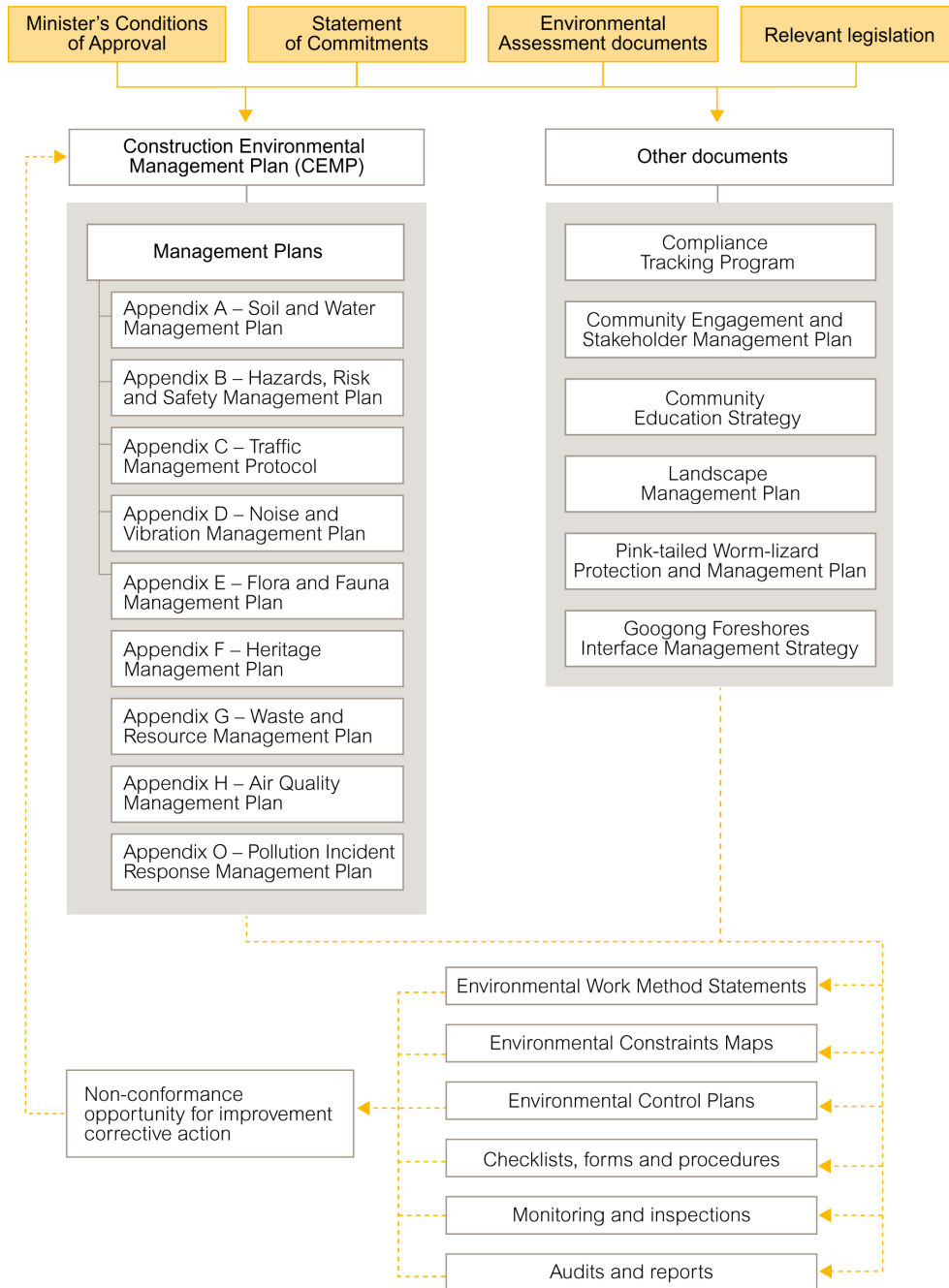
A pollution incident is required to be notified if there is a risk of material harm to the environment.

Material harm is defined under the POEO Act as:

- If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial.
- If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000.

Industry is now required to report pollution incidents immediately (ie promptly and without delay) to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

Figure 1 Environment Management System for Stage AB WRP



12083v_03_flowchart.ai

2 Project description

2.1 General features

Construction of Stage AB WRP involves establishing the following infrastructure:

- Various structures and buildings to process and treat sewage:
 - Inlet works to receive and screen sewage.
 - Bioreactor tanks.
 - Digesters.
 - Membrane tanks.
 - Chemical storage and dosing area.
 - Sludge dewatering building.
 - MCC building.
 - Blower building.
 - Administration building.
 - Vent stack and odour control units.
- Pipework and pumps to transfer sewage to the WRP, and recycled water to interim recycled water reservoir and excess recycled water to the discharge structure.
- Discharge structures to Montgomery Creek (emergency and will only be screened and degritted) and Googong Creek (for excess recycled water or recycled water that not does not meet quality criteria for reuse in the township).
- Berm (earth embankment) to provide visual screening installed on the western and southern boundary of the WRP (ranging from 2-7 metres in height).
- Access roads, crane pad and car parking areas.

The site layout of Stage AB WRP is provided in Figure 2.

2.2 Construction activities

2.2.1 Pre-construction activities

- Identification of the locations of existing underground services.
- Survey to finalise alignment of underground infrastructure.
- Establishment of temporary access road and temporary fencing.
- Establishment of the site compound within the construction footprint area (refer Figure 2)
- Installation of temporary power, telecommunications and water supply.
- Installation of appropriate environmental management controls.

2.2.2 Construction activities

Construction of Stage AB WRP is likely to take about 6-12 months and the following sequences of activities are anticipated:

Bulk earth works

- Site stripping – clearing and grubbing of vegetation.
- Respreading of topsoil.
- Compact base around berm.
- Construction of compacted earthen berm.
- Excavation of overburden and rock.
- Filling and compaction of site to appropriate levels.

Below ground civil works

- Trenching and laying of pipelines.

Structural works

- Concrete structures and slabs (for the buildings listed above).
- Block work building construction.
- Structural steelwork roof.

Mechanical fit-out

- Delivery and unloading of mechanical pumps, pre-assembled units, membranes and skids.
- Installation and assembly of piping between units.
- Installation of process equipment.

Electrical fit-out

- Installation of cable trays, permanent power, site lighting and security.
- Installation of wiring to connect pumps, plant, process equipment, alarm instrumentation and other monitoring equipment.

Road works

- Delivery of road base materials and concrete.
- Lay road base materials and compact.
- Install kerbs, road seals and guardrails.

Site demobilisation

- Removal of temporary buildings and amenities.
- Landscaping.

2.2.3 Commissioning

There are two stages of commissioning covered by this CEMP:

- Dry commissioning (testing in a dry environment – no discharge to the environment).
- Wet commissioning (testing with potable water – no discharge to the environment).

At the completion of the wet and dry commissioning phases, the Stage AB WRP would be ready to receive raw sewage and enter the process commissioning phase.. The process commissioning, process verification and operating stages involving treatment of sewage and discharge of recycled water would be addressed in the Operational Environment Management Plan (OEMP), prepared as per CoA D7 and in the operational EPL/s.

3 Hazard identification and pre-emptive measures

3.1 Identification of pollution hazards

The management plans attached to the CEMP identify environmental and safety aspects associated with the construction of Stage AB WRP. The plans that identify potential hazards relevant to pollution are outlined in the next sections.

3.1.1 Soil and water

The Soil and Water Management Plan (Appendix A of the Stage AB WRP CEMP) details risks to soil and water. Section 4.3 of the Soil and Water Management Plan identified the following pollution hazards:

- Storage of fuel and chemicals.
- Refuelling.
- Earthworks increasing the risk of erosion and sedimentation.
- Tree clearing, topsoil stripping and soil disturbance.
- Hydrostatic testing.
- Commissioning and release of treated water to the environment.

Waterways are at particular risk of pollution incidents, where chemicals, sediments and other hazardous substances can adversely affect aquatic environments. The construction of Stage AB WRP takes place away from stormwater drains which are not present on site but a drainage line is located south of the site and connects to Montgomery Creek which flows to Queanbeyan River and could be at risk of pollution incidents if spills are inappropriately managed. Montgomery Creek is shown on the Environmental Constraints Map included at Appendix B.

3.1.2 Hazards and risks

The Hazards, Risk and Safety Management Plan (Appendix B of the Stage AB WRP CEMP) details environmental hazards, risks and safety issues for Stage AB WRP. Section 4.1 of the Hazards, Risk and Safety Management Plan identified the following pollution hazards (refer to the Hazards, Risk and Safety Management Plan (Appendix B of the Stage AB WRP CEMP) for further details on the likelihood of these hazards):

- Chemical and fuel storage, transport and use.
- Plant and equipment maintenance or emergency.
- Natural disasters (bushfire, flood, earthquake etc).

3.1.3 Waste and resources

The Waste and Resource Management Plan (Appendix G of the Stage AB WRP CEMP) details risks around waste and resources. Section 4.1 of the Waste and Resource Management Plan identified the following pollution hazards:

- Liquid waste:
 - Concrete slurries drilling muds, lubricants.
 - Liquid waste from human waste storage facilities (sewage).
 - Fuels, oils, greases, engine coolant.
- Hazardous waste
 - Adhesives, lubricants, cleaning agencies, water treatment chemicals and other plastic material.
- General solid waste
 - Non-recyclable and other putrescible general solid waste.
 - Spoil, concrete, metallic materials, brick, rubble, soils.
 - Drained and crushed oil filters, rags and other absorbent material that do not contain free liquids.

3.2 Pre-emptive measures

A list of pre-emptive actions (also referred to as mitigation measures) is listed in Section 5 of each management plans listed in Section 3.1. GTPL and/or will be responsible for implementing the mitigation measures to minimise or prevent the risk of pollution incidents from occurring.

Additionally, other EMS documents have been developed and can be used to identify potential hazards to human health and the environment, (eg environmental work method statements, environmental constraints map, and specific environmental procedures, forms and checklists).

4 Inventory of pollutants

The Hazards, Risk and Safety Management Plan (Appendix B of the Stage AB WRP CEMP) requires that a Safety Data Sheet (SDS) and a Hazardous and Dangerous Substances Register be kept at all chemical storage and handling locations and which will provide an inventory of the pollutants on site. The location of pollutants to be stored/held on site is displayed in Figure 5 [to be prepared by the contractors].

The Environment Manager will:

- Ensure a current (within five years of the date of issue) SDS is available for all products and substances to be used for the work activity.
- Review the SDS to determine if the product or substance is classified as hazardous before a product or substance is used for the work activity.
- Provide all employees involved in the use of products classified as hazardous with relevant information and training to allow safe completion of the required task.
- Maintain a register of hazardous and dangerous substances used (displayed externally to storage facility).
- Ensure the quantities of chemicals are included in the hazardous substances register.

Furthermore, all storage and use of hazardous substances and dangerous goods will be stored:

- in accordance with the SDS and legislative requirements;
- in their original containers with the label intact at all times; and
- with a manifest of hazardous substances displayed externally to the storage facility.

The Environment Manager will be responsible for monitoring the quantity of chemicals stored/used on site to ensure the manifest quantity is not exceeded in accordance with the Regulations.

5 Safety equipment

A list of pre-emptive actions (or mitigation measures) to be implemented during construction of Stage AB WRP to minimise or prevent the risks to human health and the environment is outlined in Table 5.1 of the Hazards, Risk and Safety Management Plan (Appendix B of the Stage AB WRP CEMP). The table includes a description of safety equipment and activity-specific equipment to address hazard, risk and safety issues. Spill kits will also be available on site for all personnel to use.

[Contractors to provide more detail on safety equipment to be provided on site]

6 Maps

The following maps have been included in this Plan:

- Figure 2 – Stage AB WRP site layout
- Figure 3 – Stage 1 EPL premises boundary
- Figure 4 – Sensitive receivers
- Figure 5 – Location of pollutants to be stored on site *[to be prepared by the contractors]*
- Appendix A – Environmental Constraints Map for Stage AB WRP which shows all environmental features including local waterways.

Figure 2 Stage AB WRP site layout

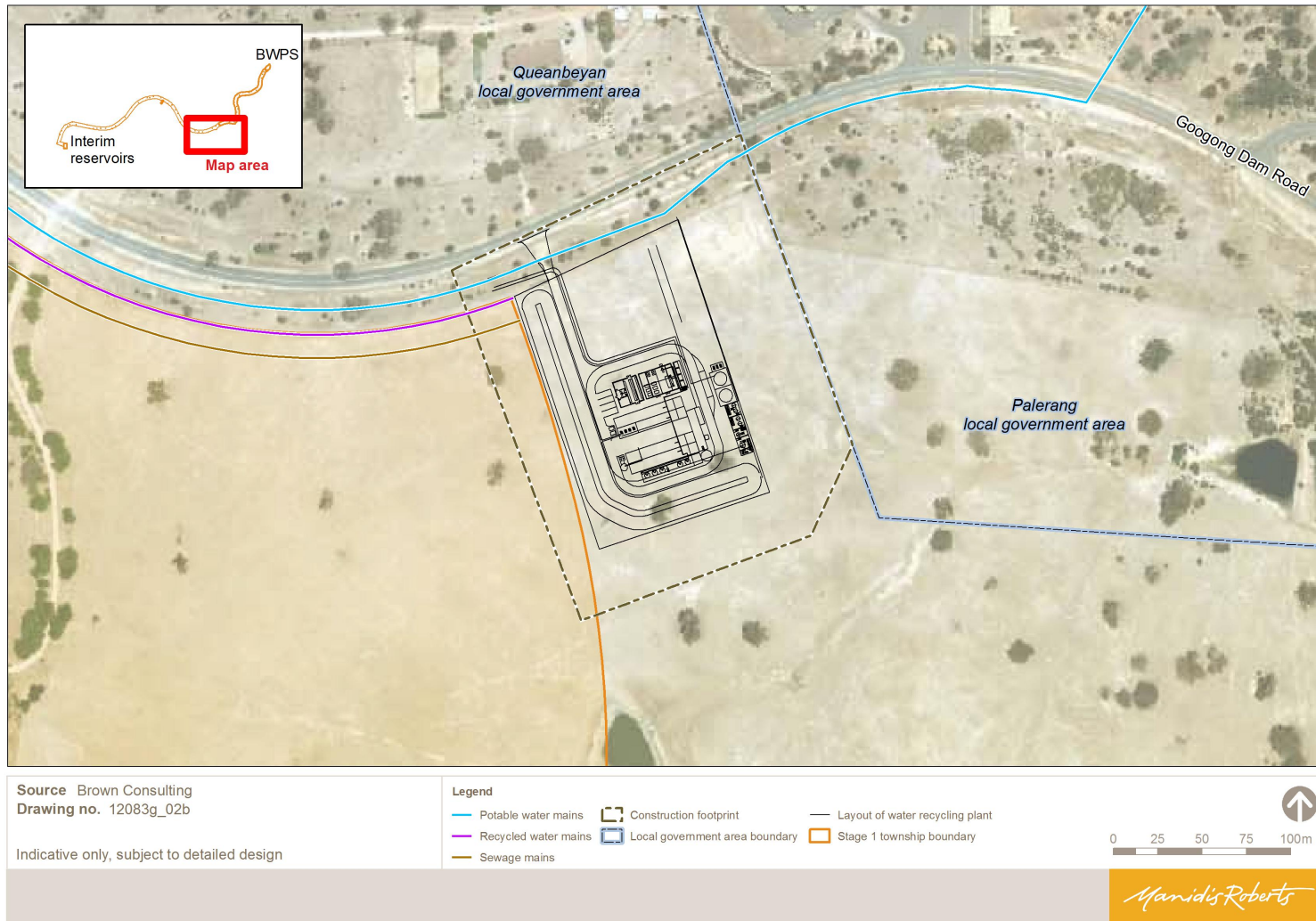


Figure 3 Stage 1 EPL premises boundary

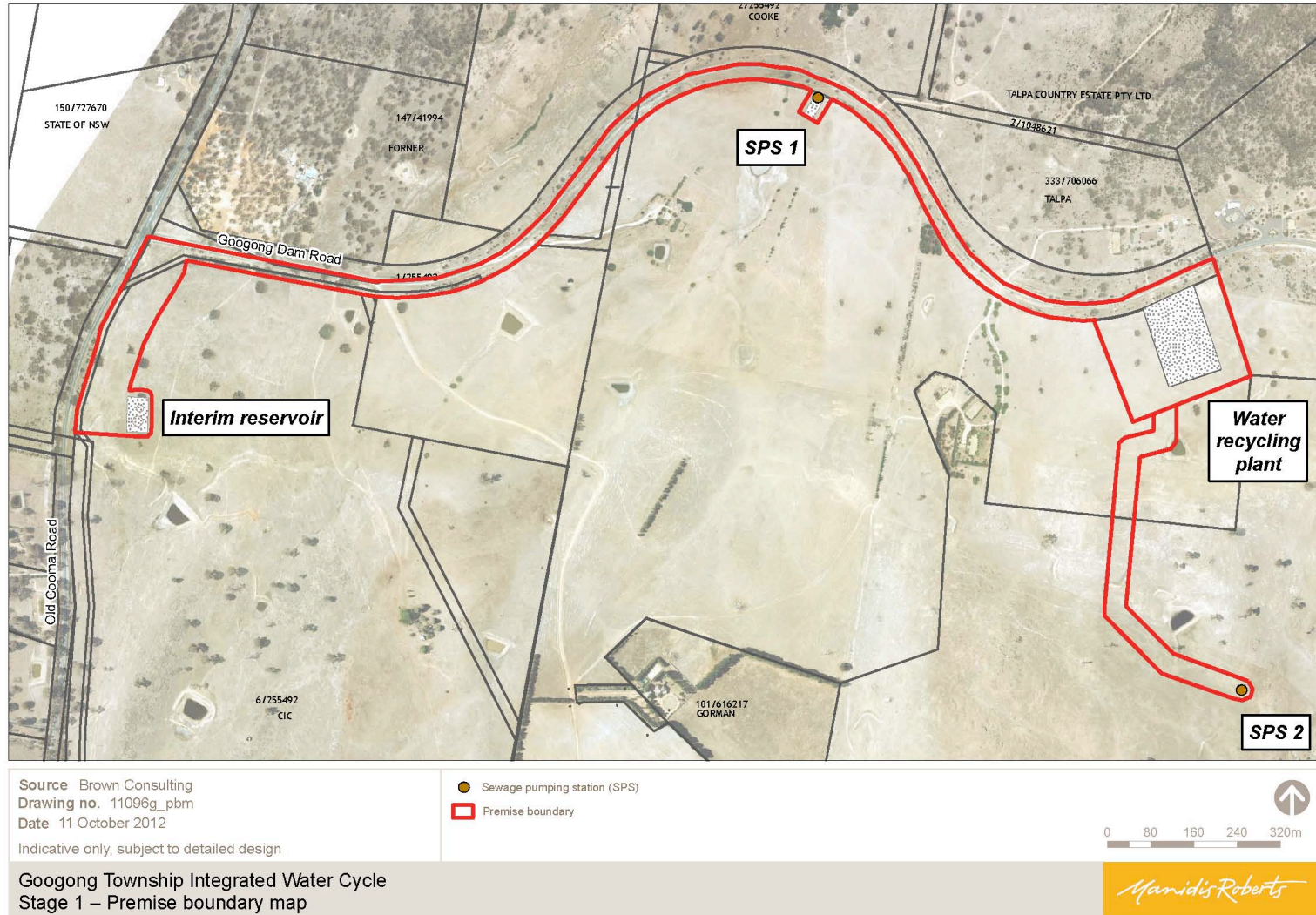


Figure 4 Sensitive receivers

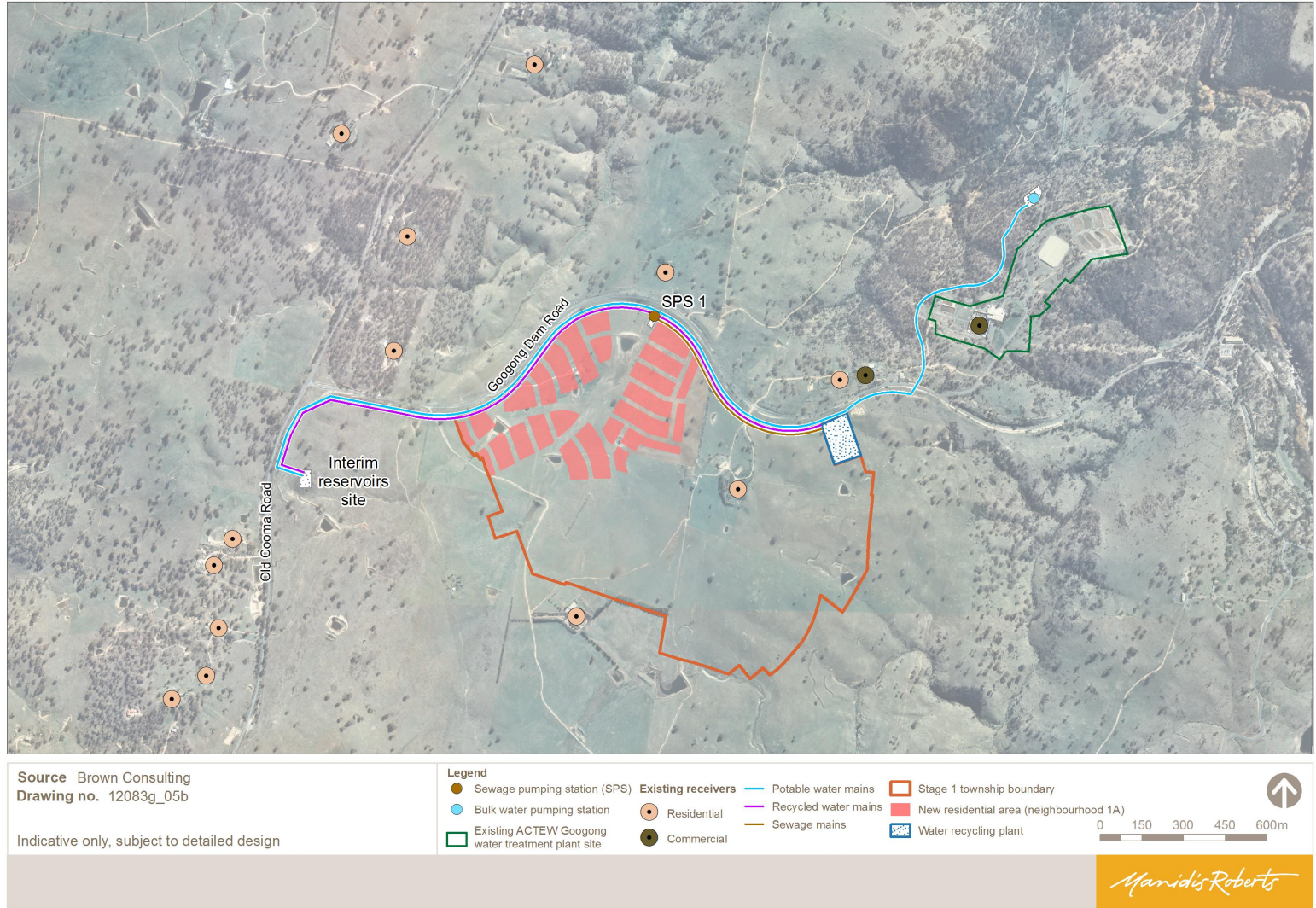


Figure 5 Location of pollutants to be stored on site

[To be prepared by the contractors]

7 Incident management and notification

Section 153F of the POEO Act requires the PIRMP is implemented if a pollution incident occurs. This section provides a detailed description of the actions that will be taken immediately after a pollution incident to reduce or control any pollution.

7.1 Classification of environmental incidents

The Stage AB WRP CEMP classifies two categories of environmental incidents. These are detailed in the sections below.

Category one

Category one incidents include:

- Unauthorised sediment discharge or fuel, oil or chemical spill leaving site where the pollution incident causes or threatens material harm to the environment or people (as per Part 5.7 of the POEO Act).
- Unauthorised impact to threatened species and endangered ecological communities.
- Unauthorised impact to Aboriginal or non-Aboriginal heritage items, sites or relics.
- Carrying out of work without necessary approval/permit /licence.

Category two

Category two incidents include:

- Pollution incidents that can be cleaned up without material harm to the environment or people (as per Part 5.7 of the POEO Act).
- A non-conformance with the environmental management system that does not result in a Category one incident.

7.2 Incident management response

The incident management response is detailed below. In the event of a spill or a hazardous substance incident the following procedures will be implemented to contain or clean up the spill:

- Dangerous Goods Hazardous Substances Management Procedure (Appendix A of the Hazards, Risk and Safety Management Plan).
- Spill Response Procedure (Appendix B of the Hazards, Risk and Safety Management Plan).

Category one

- If necessary, stop work in relevant area and take necessary actions or put in place suitable controls to avoid and reduce impacts of incidents to the environment or community (refer Spill Response Procedure and Dangerous Goods and Hazardous Substances Management Procedure).

- Project personnel to immediately notify the Environment Manager and/or Construction Manager.
- Environment Manager or Construction Manager to immediately notify the GTPL Assistant Project Director and the Environmental Representative (refer to Section 7.3 of the CEMP).
- GTPL to immediately notify the EPA and DP&I (and others as required) for pollution incidents causing or threatening material harm (refer to Section 7.3 of the CEMP).
- GTPL to immediately notify DP&I (and others as required) for all other category one incidents.
- Environment Manager to complete an incident report and record in the incident register (to be developed and managed by the contractors) and submit report to GTPL within two days.
- GTPL and contractors to investigate incident (root cause analysis) and implement any opportunities for improvement (as soon as practical, but within one week) (refer Section 7.4 of the CEMP).
- GTPL to issue copy of incident report and root cause analysis to DP&I (and others as required) for their consideration (within seven days).

Category two

- If necessary, stop work in relevant area and take necessary actions or put in place suitable controls to avoid and reduce impacts of incidents to the environment or community (refer Spill Response Procedure and Dangerous Goods and Hazardous Substances Management Procedure).
- Project personnel to immediately notify the Environment Manager and/or Construction Manager.
- Environment Manager or Construction Manager to immediately notify the GTPL Assistant Project Director and the Environmental Representative (refer to Section 7.3 of the CEMP).
- Environment Manager to complete an incident report and record in the incident register (to be developed and managed by the contractors) and submit report to GTPL within two weeks.
- GTPL and contractors to investigate incident (root cause analysis) and implement any opportunities for improvement (as soon as practical, but within one week) (refer Section 7.4 of the CEMP).
- GTPL to report on category two incidents to DP&I in the six-month construction compliance report.

7.3 Incident reporting

The Construction Manager or Environment Manager must immediately notify GTPL and the Environmental Representative of any environment incidents immediately and in writing within 24 hours of the incident occurring.

GTPL and/or the Environmental Representative will determine if the incident is a Category one or Category two incident and then follow the appropriate reporting protocol (see below and refer Figure 6).

All incident recording, management and reporting will be in accordance with the requirements of the Compliance Tracking Program, which documents GTPL's:

- Mechanisms for recording incidents and actions taken in response to those incidents.
- Provisions for reporting environmental incidents to the Director-General during construction and operation.

7.3.1 Category one pollution incident reporting - notification under the POEO Act

All pollution incidents causing or threatening material harm to the environment must be notified to the EPA via the EPA Environment Line (telephone 131 555) and to the Unit Head of the South East Region (refer Figure 6) in accordance with Section 147 of the POEO Act.

A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur. Material harm is defined under the POEO Act:

- If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial.
- If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000.

All pollution incidents causing or threatening material harm to the environment must be notified in accordance with Section 148 of the POEO Act. For Category one pollution incidents, GTPL will immediately (that is promptly and without delay, after they become aware of the incident) notify the following relevant agencies:

- DP&I.
- EPA.
- Ministry of Health.
- WorkCover.
- QCC and/or Palerang Council.
- Fire and Rescue NSW.

An environment incident report (in accordance with the reporting requirements of EPL 20188) will be prepared by the contractors and provided to GTPL and the Environmental Representative within two days of the incident occurring, including learnings from the incident and proposed measures to prevent the occurrence of a similar incident.

Within seven days of the incident occurring, GTPL will provide a detailed incident report and copy of the root cause analysis investigation to the EPA, including the following information in accordance with Section 150 of the amended POEO Act:

- The time, date, nature duration and location of the incident.
- 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.
- The circumstances in which the incident occurred, including the cause of the incident, if known.
- The action or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.
- Other information prescribed by the regulations.

7.3.2 All other Category one incident reporting

For all other Category one incidents, GTPL will notify the Director-General DP&I and any relevant agencies as soon as practicable after GTPL becomes aware of the incident.

An environment incident report will be prepared by the contractors and provided to GTPL and the Environmental Representative within two days of the incident occurring, including learnings from the incident and proposed measures to prevent the occurrence of a similar incident.

Within seven days of the incident occurring, GTPL will provide the Director-General of DP&I, and any relevant agencies referenced in Section 7.3.1, a detailed incident report and copy of the root cause analysis investigation.

7.3.3 Category two incident reporting

An environment incident report will be prepared by the contractors and provided to GTPL and the Environmental Representative within two weeks of the incident occurring, including learnings from the incident and proposed measures to prevent the occurrence of a similar incident.

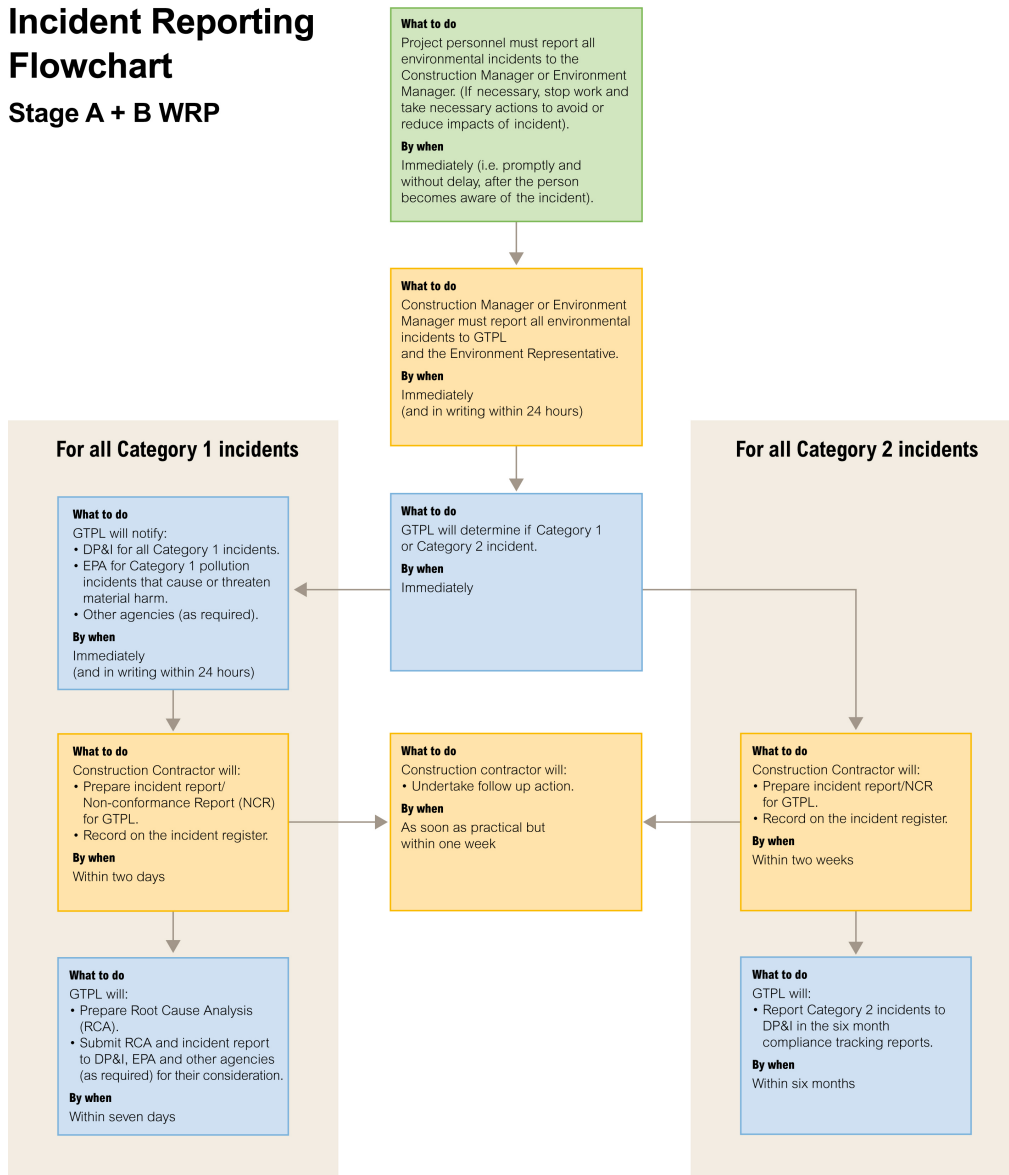
Category two incidents will be reported to DP&I through the six-monthly construction compliance reports.

Figure 6 Incident reporting flowchart

[to be printed and posted up in the site office]

Incident Reporting Flowchart

Stage A + B WRP



<p>What is a Category 1 Incident?</p> <ul style="list-style-type: none"> Unauthorised sediment discharge or fuel, oil or chemical spill leaving site where the pollution incident causes or threatens material harm to the environment or people (as per Part 5.7 of the NSW Protection of the Environment Operations Act 1997 (POEO Act)). Unauthorised impact to threatened species and endangered ecological communities. Unauthorised impact to Aboriginal or non-Aboriginal heritage items, sites or relics. Carrying out of work without necessary approval/permit/licence. <p>What is a Category 2 Incident?</p> <ul style="list-style-type: none"> Pollution incidents that can be cleaned up without material harm to the environment or people (as per Part 5.7 of the POEO Act). A non-conformance with the environmental management system that does not result in a Category 1 incident. 	<p>Contact details</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Phone</th> <th>Email</th> </tr> </thead> <tbody> <tr> <td>Construction Manager (TBA)</td> <td>TBA</td> <td>TBA</td> </tr> <tr> <td>Environment Manager (TBA)</td> <td>TBA</td> <td>TBA</td> </tr> <tr> <td>Richard Sharp (Environment Representative)</td> <td>0427 953 053</td> <td>richard.s@nghenvironmental.com.au</td> </tr> <tr> <td>Craig Harris (GTPL Assistant Project Director)</td> <td>0409 999 059</td> <td>Craig.Harris@cicaustralia.com.au</td> </tr> <tr> <td>James Clouten (GTPL Project Manager)</td> <td>0401 018 710</td> <td>james.clouten@mirvac.com</td> </tr> <tr> <td>Natalie Green (Environment Advisor to GTPL, RPS)</td> <td>0406 704 271</td> <td>Natalie.Green@rpsgroup.com.au</td> </tr> <tr> <td>Lisa Mitchell (Manager Water Infrastructure Projects, DP&I)</td> <td>(02) 9228 6284</td> <td>Lisa.Mitchell@planning.nsw.gov.au</td> </tr> <tr> <td>Alexander Scott (Planning Officer, DP&I)</td> <td>(02) 9228 2096</td> <td>Alexander.Scott@planning.nsw.gov.au</td> </tr> <tr> <td>Julian Thompson (Unit Head - South East Region, EPA)</td> <td>(02) 6229 7002</td> <td>Julian.Thompson@epa.nsw.gov.au</td> </tr> <tr> <td>EPA Hotline</td> <td>131 555</td> <td></td> </tr> <tr> <td>Queanbeyan City Council</td> <td>(02) 6285 6000 (02) 6298 1234 (after hours)</td> <td></td> </tr> <tr> <td>NSW Rural Fire Service</td> <td>000</td> <td></td> </tr> <tr> <td>Southern NSW Local Health District Public Health Unit</td> <td>(02) 6080 8900</td> <td></td> </tr> <tr> <td>WorkCover NSW</td> <td>131 050</td> <td></td> </tr> </tbody> </table>			Name	Phone	Email	Construction Manager (TBA)	TBA	TBA	Environment Manager (TBA)	TBA	TBA	Richard Sharp (Environment Representative)	0427 953 053	richard.s@nghenvironmental.com.au	Craig Harris (GTPL Assistant Project Director)	0409 999 059	Craig.Harris@cicaustralia.com.au	James Clouten (GTPL Project Manager)	0401 018 710	james.clouten@mirvac.com	Natalie Green (Environment Advisor to GTPL, RPS)	0406 704 271	Natalie.Green@rpsgroup.com.au	Lisa Mitchell (Manager Water Infrastructure Projects, DP&I)	(02) 9228 6284	Lisa.Mitchell@planning.nsw.gov.au	Alexander Scott (Planning Officer, DP&I)	(02) 9228 2096	Alexander.Scott@planning.nsw.gov.au	Julian Thompson (Unit Head - South East Region, EPA)	(02) 6229 7002	Julian.Thompson@epa.nsw.gov.au	EPA Hotline	131 555		Queanbeyan City Council	(02) 6285 6000 (02) 6298 1234 (after hours)		NSW Rural Fire Service	000		Southern NSW Local Health District Public Health Unit	(02) 6080 8900		WorkCover NSW	131 050	
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8 Emergency contact details

Table 1 Emergency contacts

Emergency contact/organisation	Name	Contact details
GTPL Assistant Project Director	Craig Harris	0409 999 059
Construction Manager (Contractor)	TBA	TBA
Environment Manager (Contractor)	TBA	TBA
Environmental Representative (nghenvironmental)	Richard Sharp	(02) 6280 5053
OEH – EPA	Pollution line	131 555
OEH – EPA (South East Region)	Julian Thompson	(02) 6229 7002
DP&I	Lisa Mitchell	(02) 9228 6284
NSW Health	N/A	(02) 9391 9000
Police	N/A	000 (or 112 from mobiles)
Local Police	N/A	131 444
Ambulance	N/A	000 (or 112 from mobiles)
Canberra Hospital	N/A	(02) 6244 2222
NSW Rural Fire Service	N/A	000 (or 112 from mobiles)
Gas/electricity	N/A	131 909
Queanbeyan City Council	N/A	(02) 6285 6000 After hours (02) 6298 1234
ACTEW Corporation	N/A	6248 3111
WorkCover NSW	N/A	13 10 50
Telstra	N/A	132 999
ACT Territory and Municipal Services	N/A	13 22 81
WIRES	N/A	1300 194 737

9 Emergency response and minimising harm to persons

The contractors will be responsible for preparing and implementing an emergency response plan to minimise the risk of harm to any persons on the premises resulting from a pollution incident (and other emergencies such as fire, flood etc). As part of this plan the following will be included:

- Evacuation procedures including the advertising of muster points.
- Identifying options for medical treatment and location of nearby services.

[Contractors to provide details on emergency response plan]

10 Community notification

Local community stakeholders that may be potentially affected by a pollution incident include nearby residents, the ranger station and the ACTEW water treatment plant or downstream water users (refer Figure 4). In the unlikely event of a pollution incident that could result in impacts outside the Stage AB WRP site, community stakeholders will be notified immediately by one of the following methods:

- Door knocking by GTPL representative or emergency services personnel (dependent on nature of event).
- Phone call by GTPL representative.
- Other methods determined by the GTPL as deemed necessary or as advised by a particular agency (eg follow up letters/emails, or website update).

All communications will be undertaken in accordance with the Community Engagement and Stakeholder Management Plan that includes a Community Information Plan, which has been prepared for Stage 1 of the IWC Project.

11 Staff training

Details regarding the nature and objectives of any staff competence, training and awareness are outlined in Section 5 of the Stage AB WRP CEMP. Several forms of environmental training will be provided, including:

- A project site induction, including environmental roles and responsibilities.
- Toolbox talks.
- Environmental Work Method Statements for site activities to which all site personnel will be inducted.
- Environmental awareness training for specific issues.

The Environment Manager will undertake training and maintain a register of all project site inductions and environmental training carried out will be maintained.

Section 5 of the Hazards, Risk and Safety Management Plan (Appendix B of the Stage AB CEMP) also provides details on induction training specifically related to safety and environmental issues.

12 Testing and review

12.1 Testing of the PIRMP

12.1.1 Timing

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

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.

2) 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 commencement of construction of Stage AB WRP.
- Every 12 months thereafter, while construction continues, and
- Within 1 month of any Category One pollution incident during the construction of Stage AB WRP.

12.1.2 Records

Testing of the PRIMP will involve:

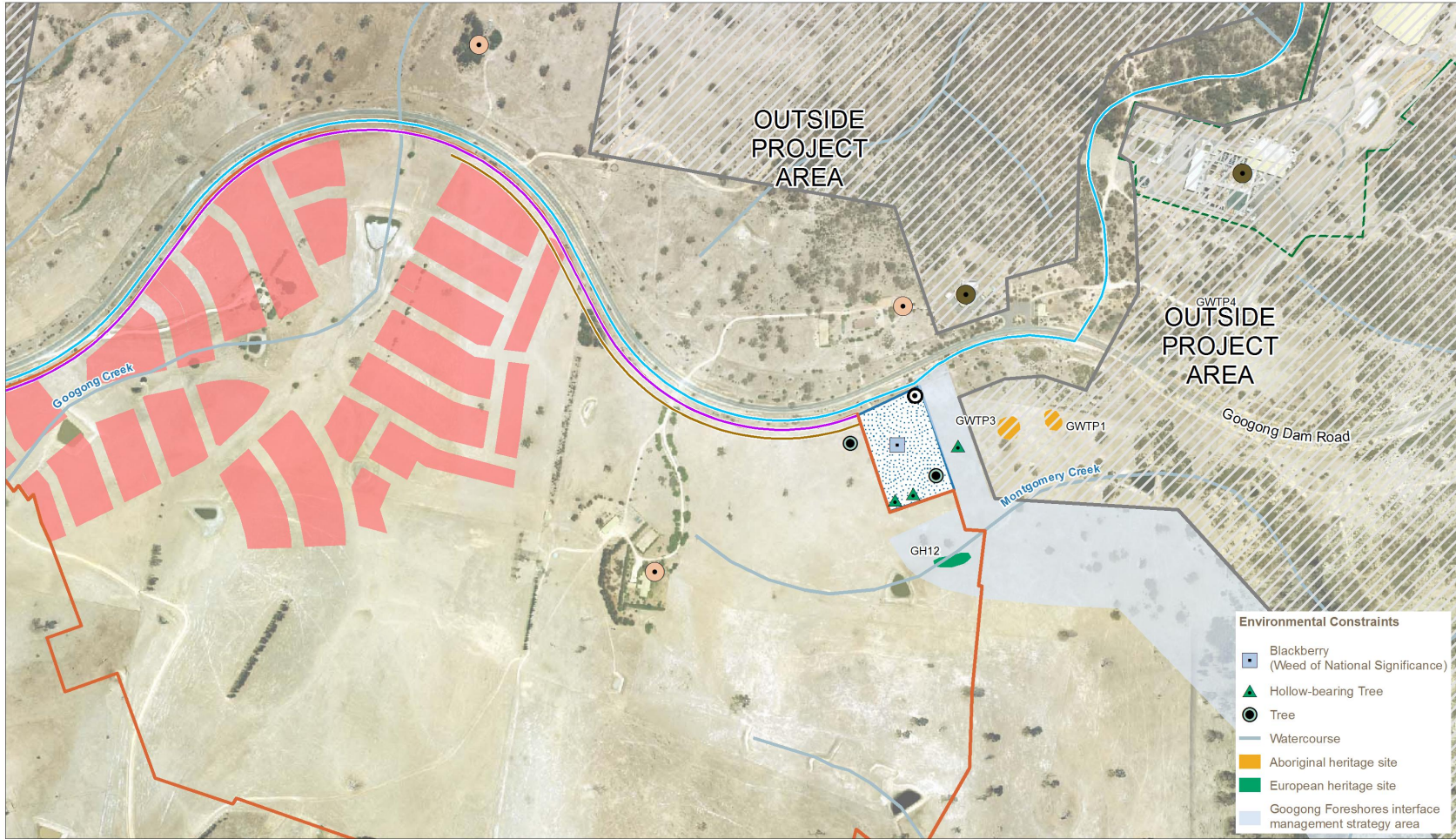
- Desk top simulation; or
- Practical exercise or drill.

The Environment Manager will record the outcomes of each test by the using the register included at Appendix C. If the test identifies any shortcomings, especially in the implementation of the Spill Response Procedure or Dangerous Goods Hazardous Substances Management Procedure, this PIRMP will be corrected and/or appropriate non-conformance actions will be undertaken in accordance with Section 8.3 of the Stage AB WRP CEMP. This would include any non-conformance or opportunities for improvement to be recorded through the non-conformance register.

Appendix A **EPL #20188**

Appendix B

Environmental Constraints Map



Source Brown Consulting
 Drawing no. 12083g_07b

Indicative only, subject to detailed design

Legend

- Weather station
- Existing ACTEW Googong water treatment plant site
- Residential
- Commercial
- Potable water mains
- Recycled water mains
- Sewage mains
- Stage 1 township boundary
- New residential area (neighbourhood 1A)
- Water recycling plant



Manid's Roberts

Appendix C PIRMP Test Register

Date of test	Name of personnel undertaking test	Manner of testing	Summary of changes (include brief detail and section number)	Date of update