



# Pollution Incident Response Management Plan

## Googong Township IWC Project: Stage B Network

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Approval for Issue

Name	Signature	Date
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## 1.0 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 B Network (refer Appendix 1) 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 B Network, 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 B Network 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 B Network 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 contractor 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'

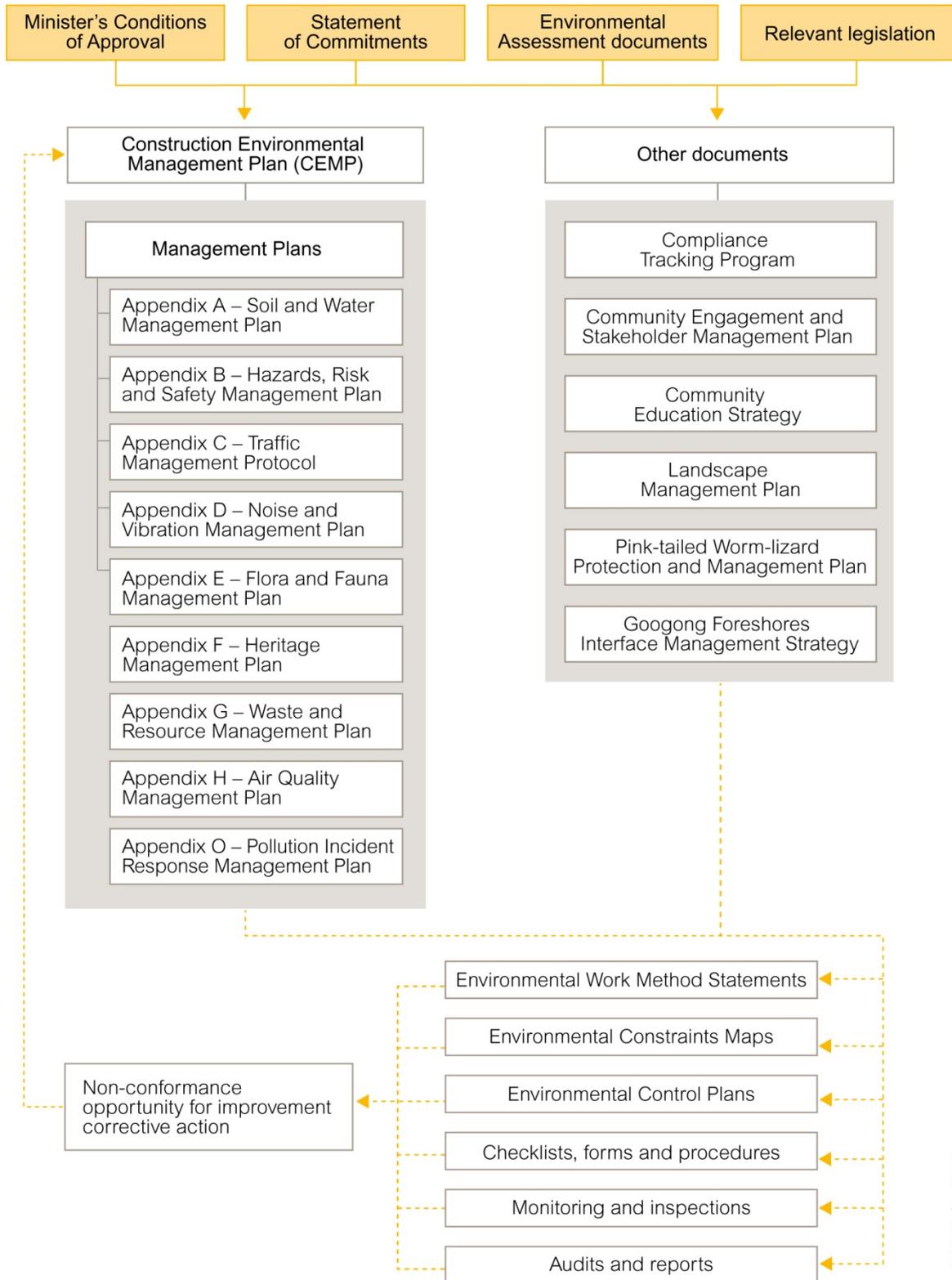
The POEO Act defines a pollution incident as:

*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 (i.e. promptly and without delay) to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.



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Figure 1 Environment Management System for Stage B Network

## 2.0 Project description

### 2.1 General features

Construction of Stage B Network involves establishing the following infrastructure:

- Sewage pumping station (SPS2) and wet well storage and associated structures and ancillaries (e.g. flood lighting, above ground control cabinets and fencing), at the southern section of the Stage B Network area. The proposed SPS2 site area is approximately 50 by 20 metres.
- Dry weather emergency storage at SPS2 upstream of the wet well within the SPS2 site. A high-level flow diversion will be provided from the collection manhole to the emergency storage (sized at eight times the Average Dry Weather Flow ~723 kilolitres). The storage arrangement is likely to be similar to SPS1 and will comprise buried storage tanks. These tanks will typically sit on concrete slab foundations secured in place using stainless steel tie-down straps, subject to detailed design.
- Overflow structure (including a gas check structure) off the collecting manhole or emergency storage. The overflow will drain to the stormwater attenuation structure.
- Rising main/s which will transfer flows approximately 870 metres from SPS2 in the south to the inlet works of the WRP to the north of the Stage B Network project area. It is likely that Stage B Network will be constructed with two rising mains initially (sizing to be determined during detailed design). One will be sized to cater for the initial stage design while the second will be sized to cater for the ultimate stage design. The second rising main will be initially capped, filled with water and left out of service.
- Stormwater drainage including an embankment for stormwater flow attenuation adjacent to the pumping station. This embankment will be approximately three metres high, and will be located at the stormwater discharge point for development upstream of Montgomery Creek.
- New vent shaft for odour management (approximately nine metres high, subject to detailed design) located as far away from the nearest future residences as possible at the SPS2 site.
- Temporary access road (minimum width 3.5 metres along the rising main alignment), which will be finished with a single coat seal initially. A retaining wall system may be required for the access road.
- Connections to telemetry, electricity and water services.

The site layout of Stage B Network 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.
- Formation of access road – excavation to grade as required, and importation and placement of appropriate fill for the road.
- Establishment of the site compound within the construction footprint area (refer Figure 2).
- Installation of temporary power and water supply – trench excavation and pipe laying.
- Erection of temporary fencing and installation of temporary gates to define the construction corridor.
- Clearing of existing vegetation.
- Removal and stockpiling of topsoil.
- Installation of appropriate environmental management controls including erosion and sediment control.

## 2.2.2 Construction activities

Construction of the Stage B Network is likely to take about 6-8 months and the following sequences of activities are anticipated:

### 2.2.2.1 Earth works

- Trench excavation, installation of rising main, placement and compaction of material.
- Deep excavation for the wet well. This include excavation in rock material, where blasting would be required.

### 2.2.2.2 Concrete works

- Formwork erection, steel fixing, concrete deliveries, concrete pumping, concrete vibration, finishing.

### 2.2.2.3 Storage installation

- Excavation, concrete pouring for slab, craning tanks into excavation, backfill and compaction.
- Pipe laying and connections.

### 2.2.2.4 Mechanical installation

- Installation of two pumps at SPS2.

### 2.2.2.5 Electrical installation

- Power cabinets and conduit at SPS2
- Telemetry installation

### 2.2.2.6 Permanent site access

- Delivery of road base materials and asphalt.
- Lay road base materials and compact, prior to asphaltting.

### 2.2.2.7 Site demobilisation and rehabilitation

- Removal of temporary works such as buildings, amenities, fences, gates, erosion and sediment controls.
- Reinstatement of final ground levels, replacement of topsoil and restoration.

## 2.2.3 Commissioning

There are two stages of commissioning:

- Dry testing of equipment (testing in a dry environment).
- Wet testing of rising main and wet well (testing with potable water).

For the wet testing, the rising main and SPS2 will undergo pressure and hydrostatic testing to test for strength and leaks. The test involves filling each component with potable water to test the pipe to a specific test pressure. About 500 kilolitres of water will be required for testing and commissioning. A small amount of water will also be required for washdown.

## 3.0 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 B Network. 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 1 of the Stage B Network CEMP) details risks to soil and water. Section 4.3 of the Soil and Water Management Plan identified the following pollution hazards:

- Vegetation clearing, topsoil stripping and soil disturbance.
- Storage of fuel and chemicals.
- Refuelling.
- Earthworks increasing the risk of erosion and sedimentation.
- Commissioning (including hydrostatic testing) 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 B Network intercepts two ephemeral drainage lines that drain to Montgomery Creek that flows to Queanbeyan River and could be at risk of pollution incidents if spills are inappropriately managed. There also two farm dams located in close proximity that could be adversely affected by spills. Montgomery Creek is shown on the Environmental Constraints Map included at Appendix 2.

#### 3.1.2 Hazards and risks

The Hazards, Risk and Safety Management Plan (Appendix 2 of the Stage B Network CEMP) details environmental hazards, risks and safety issues for Stage B Network. 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 2 of the Stage B Network 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 7 of the Stage B Network 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, (e.g. environmental work method statements, environmental constraints map, and specific environmental procedures, forms and checklists).

## 4.0 Inventory of pollutants

The Hazards, Risk and Safety Management Plan (Appendix 2 of the Stage B Network 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 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.

## 5.0 Safety equipment

A list of pre-emptive actions (or mitigation measures) to be implemented during construction of Stage B Network 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 2 of the Stage B Network 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.

*Refer to Guideline ACT Workplace Health and Safety management Plan for more detail on PPE and Site Safety Equipment.*

## 6.0 Maps

The following maps have been included in this Plan:

- Figure 2 – Stage B Network site layout
- Figure 3 – Stage 1 EPL premises boundary (n.b this figure shows the current EPL premise boundary that was based on the concept design for Stage B Network, the actual boundary for Stage B Network section has now moved slightly east as design and neighbourhood planning has progressed. A formal request to amend the EPL boundary will be submitted to the EPA prior to the commencement of works. No works will commence until the EPA has confirmed the new premise boundary).
- Figure 4 – Sensitive receivers
- Figure 5 – Location of pollutants to be stored on site - *pollutants and hazardous substances are stored at Guideline ACT site compound at the SPS2 construction site, as shown in the two site layout figures provided. ~~for the Bulk water offtake project next to the treatment plant, this will be stored here until the works have finished on the stage A Googong IWC works has finished early March 2015~~*
- Appendix 1 – Environmental Constraints Map for Stage B Network that shows environmental features including local waterways.

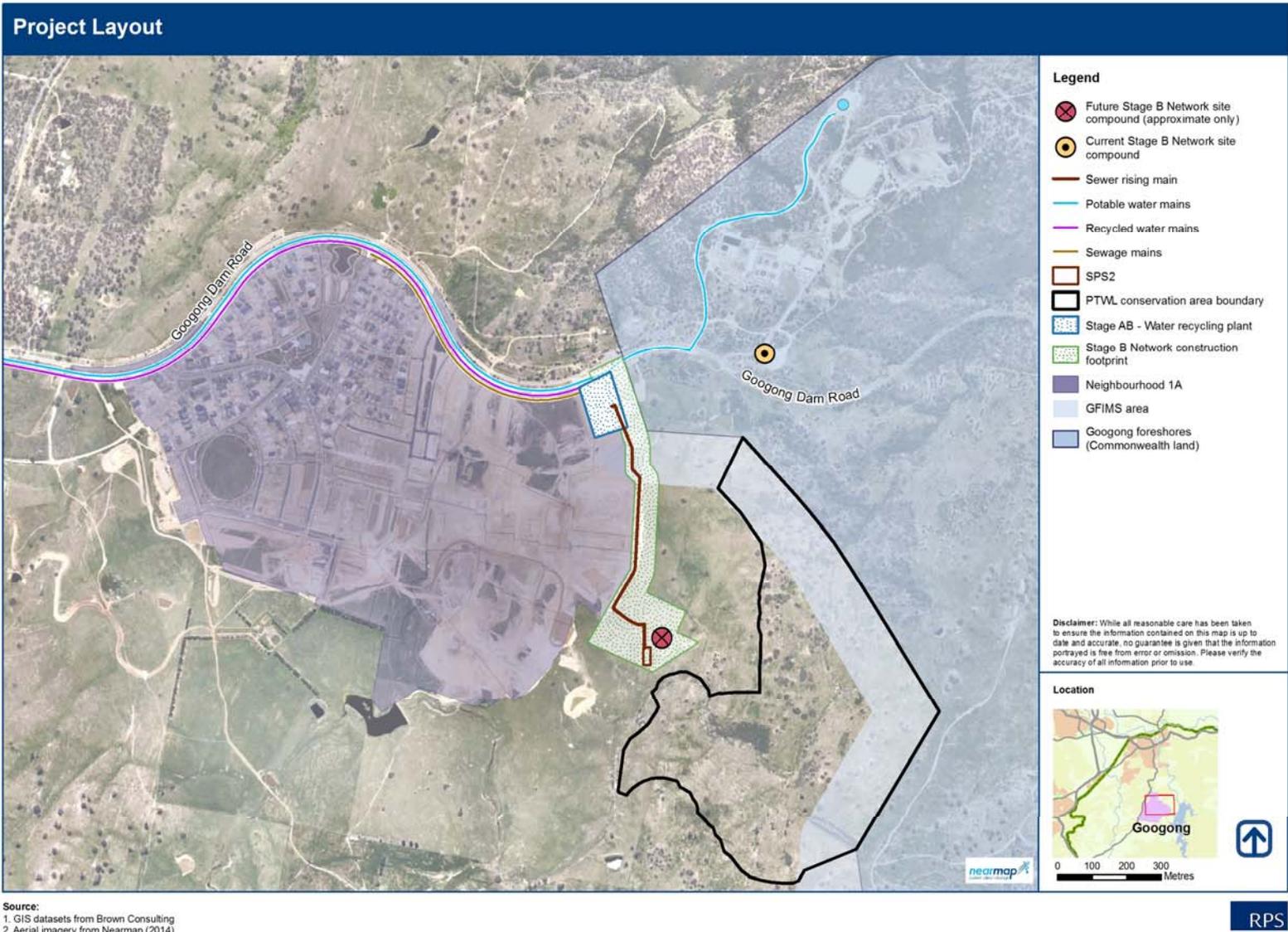


Figure 2 Stage B Network site layout [updated construction footprint]



Figure 3 Stage 1 EPL premises boundary

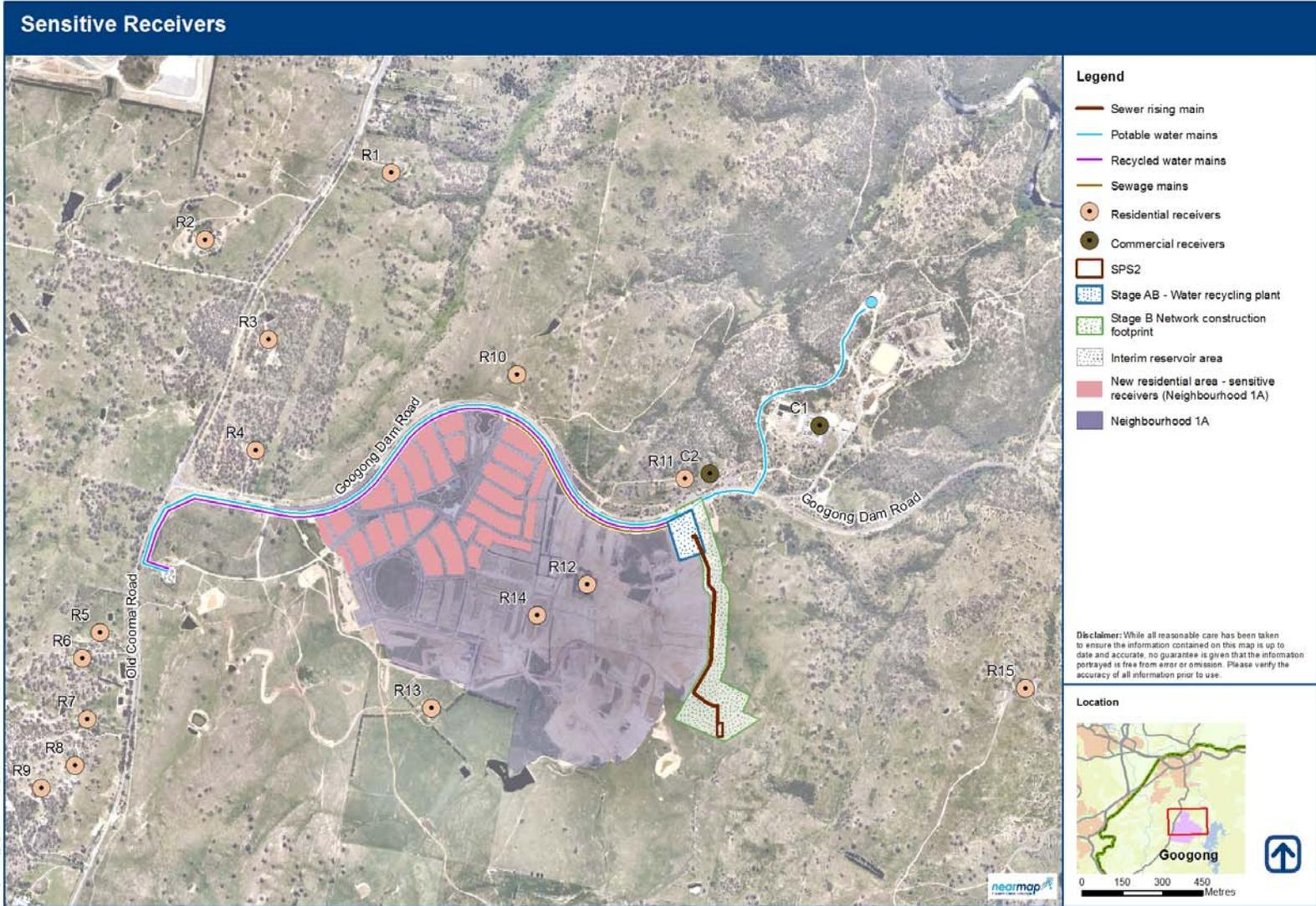
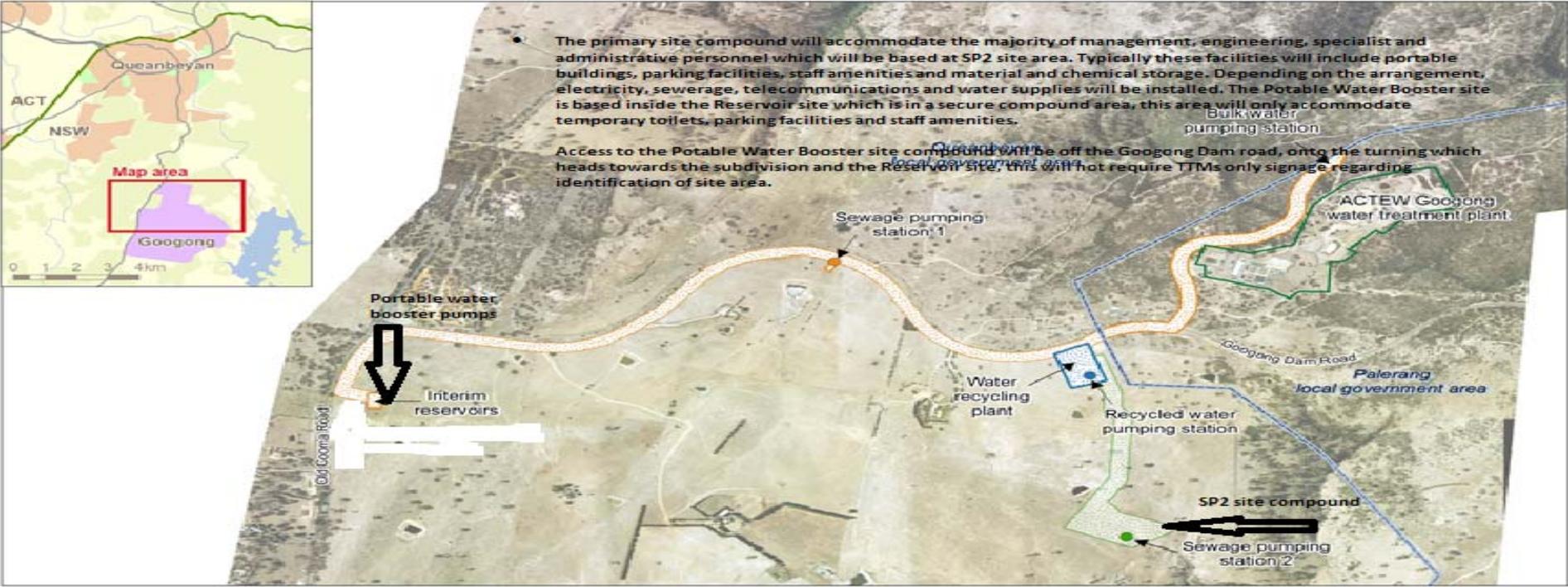


Figure 4 Sensitive receivers [updated construction footprint]

[

Figure 5 Location of pollutants to be stored on site

Location of pollutants are stored at Guideline ACT site compound at the SPS2 site for the Bulk water offtake project next to the treatment plant, this will be stored here until the works have finished on the stage A Googong IWC works has finished.





## 7.0 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 B Network CEMP classifies two categories of environmental incidents. These are detailed in the sections below.

#### 7.1.1.1 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.

#### 7.1.1.2 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 1 of the Hazards, Risk and Safety Management Plan).
- Spill Response Procedure (Appendix 2 of the Hazards, Risk and Safety Management Plan).

#### 7.2.1.1 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 Department of Planning and ~~Environment Infrastructure~~ (DP&E) (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&E (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 contractor) and submit report to GTPL within two days.
- GTPL and contractor 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&E (and others as required) for their consideration (within seven days).

#### 7.2.1.2 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 contractor) and submit report to GTPL within two weeks.
- GTPL and contractor 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&E in the six-month construction compliance report.
- GTPL to report on category two incidents to EPA in the Annual Return.

### 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 and Condition R2 of EPL 20188.

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&E†.
- 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 contractor 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 and Condition R3 of EPL 20188:

- 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 of DP&E† and any relevant agencies as soon as practicable after GTPL becomes aware of the incident.

An environment incident report will be prepared by the contractor 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&E†, 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 contractor 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&E† through the six-monthly construction compliance reports. They will also be reported to the EPA through the Annual Return in accordance with Condition R1 of EPL 20188.

Figure 6 Incident reporting flowchart [figure updated]

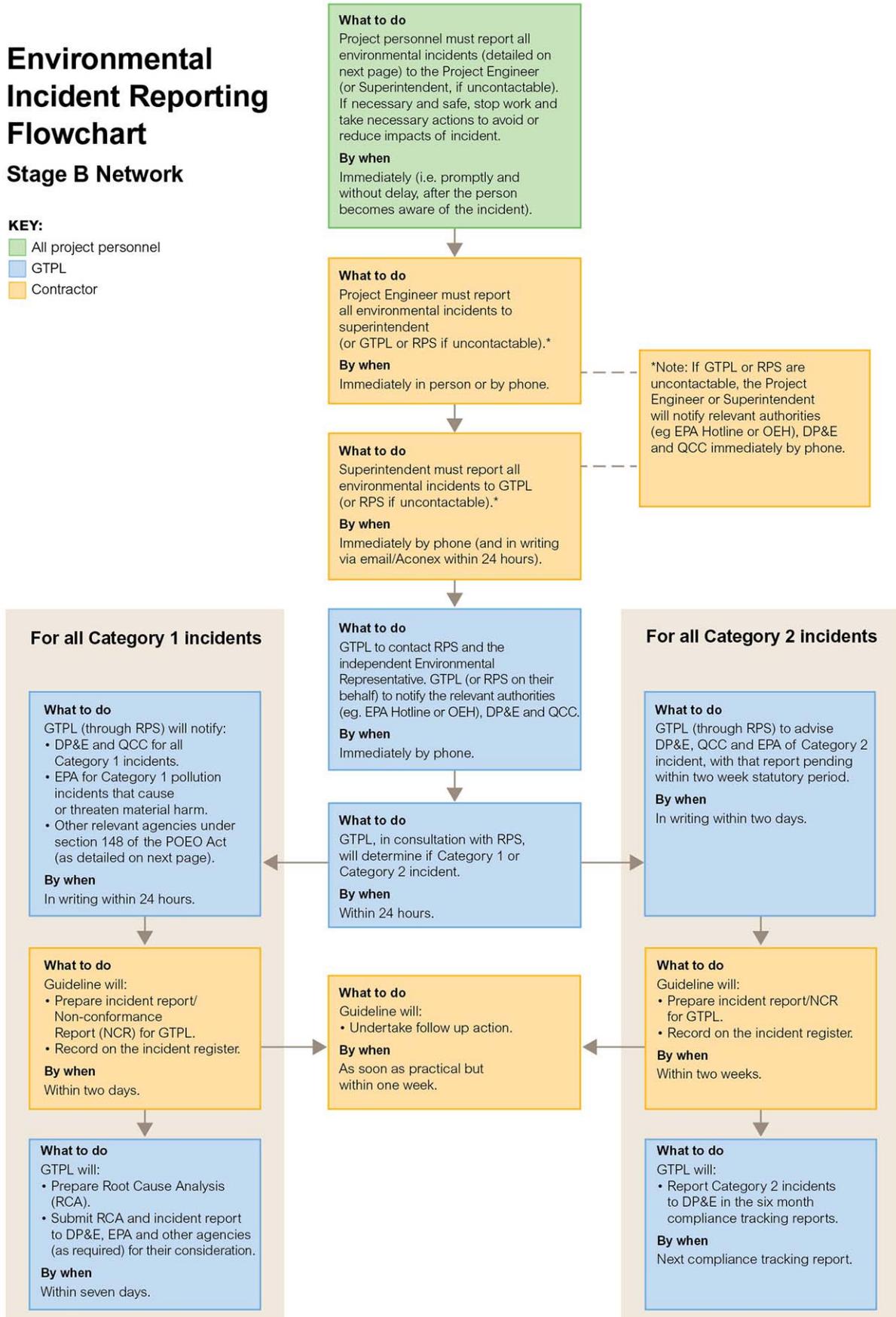
[Liaise with RPS to update, to be printed and posted up in the site office]

# Environmental Incident Reporting Flowchart

## Stage B Network

**KEY:**

- All project personnel
- GTPL
- Contractor



**WHAT IS AN ENVIRONMENTAL INCIDENT?****What is a Category 1 Incident?**

- A pollution incident which 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). For example, unauthorised sediment discharge or fuel, oil or chemical spill leaving site.
- 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.

**What is a Category 2 Incident?**

- 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.

**CONTACT DETAILS****PROJECT TEAM**

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<b>Craig Harris</b> (Assistant Project Director)	0409 999 059	craig.harris@cicaustralia.com.au
<b>RPS</b>		
<b>Rob Salisbury</b> (Environment Advisor to GTPL)	0416 034 054	rob.salisbury@rpsgroup.com.au
<b>ECOLOGY AND HERITAGE PARTNERS</b>		
<b>Richard Sharp</b> (Environment Representative)	0457 303 596	rsharp@ehpartners.com.au

**AGENCIES**

<b>DP&amp;E</b>		
<b>Lisa Mitchell</b> (Manager Water Infrastructure Projects)	(02) 9228 6284	lisa.mitchell@planning.nsw.gov.au
<b>EPA (Pollution Incidents)</b>		
<b>Julian Thompson</b> (Unit Head - South East Region)	(02) 6229 7002	julian.thompson@epa.nsw.gov.au
<b>Sharon Peters</b> (Regional Operations Officer)	(02) 6229 7002	sharon.peters@epa.nsw.gov.au
<b>EPA Hotline</b>	131 555	
<b>OEH (Heritage and Biodiversity)</b>		
<b>Jackie Taylor</b> (Archaeologist – South East)	0408 201 239	jackie.taylor@environment.nsw.gov.au
<b>Heritage Council of NSW</b> (for non-Aboriginal heritage)	(02) 9873 8500	
<b>Rod Pietsch</b> (Senior Threatened Species Officer)	(02) 6229 7114	rod.pietsch@environment.nsw.gov.au
<b>QCC</b>		
<b>QCC Duty Officer</b>	0417 499 153	

**OTHER AGENCIES**

<b>NSW Rural Fire Service</b>	000	
<b>Southern NSW Local Health District Public Health Unit</b>	(02) 6080 8900	
<b>WorkCover NSW</b>	131 050	

**Notification of pollution incidents under Section 148 of the Protection of Environment Operations Act 1997.**

Pollution incidents causing or threatening material harm to the environment must, immediately after the incident is made aware of, notify each relevant authority of the incident and all relevant information about it.

Relevant authority means any of the following:

- for all incidents
  - EPA
  - QCC
- potentially
  - Southern NSW Local Health District Public Health Unit
  - WorkCover NSW
  - NSW Rural Fire Service

Contact details have been provided for the relevant authorities.

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Information as of November 27, 2014

## 8.0 Emergency contact details

Table 1 Emergency contacts

Emergency contact/organisation	Name	Contact details
GTPL Assistant Project Director	Craig Harris	0409 999 059
Project Engineer Guideline ACT	Michael Fields	0412 916 835
<del>Environment Manager (Contractor)</del>	<del>TBA</del>	<del>TBA</del>
Environmental Representative ( <del>ng</del> environmental Ecology and Heritage Partners)	Richard Sharp	<del>(02) 6280 5053-0457 303 396</del>
OEH – EPA	Pollution line	131 555
OEH – EPA (South East Region)	Julian Thompson	(02) 6229 7002
DP&E†	Lisa Mitchell	(02) 9228 62834
	<del>Belinda Scott</del>	<del>(02) 9228 6472</del>
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
Queanbeyan Hospital	N/A	(02) 6298 9211
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

## 9.0 Emergency response and minimising harm to persons

The contractor 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.

Refer to [Guideline ACT Workplace Health and Safety management Plan](#) for more detail regarding emergency response

## 10.0 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 B Network 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.

## 11.0 Staff training

Details regarding the nature and objectives of any staff competence, training and awareness are outlined in Section 5 of the Stage B Network 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 2 of the Stage B Network CEMP) also provides details on induction training specifically related to safety and environmental issues.

## 12.0 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 B Network.
- Every 12 months thereafter, while construction continues, and
- Within 1 month of any Category One pollution incident during the construction of Stage B Network.

#### 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 3. 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 B Network CEMP. This would include any non-conformance or opportunities for improvement to be recorded through the non-conformance register.

## Appendix I

EPL #20188

## Appendix 2

### Environmental Constraints Map [figure updated]



## Appendix 3

### PIRMP Test Register

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