

APPENDIX B10

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

	Site Details
Client:	Transport for NSW
Site Name:	Newell Highway Upgrade at Parkes - Parkes Bypass
ID Code:	6123-ENV-MP-001 App B10 PIRMP

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Document Revision History

Version	Date	Revision Details	Author	Reviewed by
A	13/09/21	For TfNSW review	Glen Bolton	Grant Fletcher
0	14/10/21	For Construction	Glen Bolton	Grant Fletcher
1	May 2022	Review Section Plan	Grant Fletcher	Glen Bolton
2	Nov 2022	Document Revision	Grant Fletcher	Glen Bolton
3	15/05/2023	PIRMP Desktop document review (Post incident), ESR and HSO contact update	Raj Parmar	Glen Bolton
4	Sept 2023	Contact update and review	Raj Parmar	Glen Bolton

PIRMP testing history

Date	Description of test
06/10/2022	Emergency drill scenario of plant rollover emergency an oil / fuel spill emergency containment.
03/10/2023	PIRMP Testing Scenario

Distribution of Controlled Copies

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1. INTRODUCTION

This Plan has been prepared in order to guide and direct the response by Newell Highway Upgrade at Parkes project. Georgiou Group Pty Ltd currently holds EPL 21473 for the project.

This Pollution Incident Response Management Plan must be prepared for all Projects based in NSW that hold an Environment Protection Licence (EPL), or for any project if directed to prepare one by the EPA.

It is a requirement under Clause 98D of the POEO Amendment Regulations 2012 that certain sections of the Plan are made publicly available on the website within 14 days after being prepared and approved for issue. The sections are those that cover procedures for contacting the relevant authorities and communicating with the community.

2. POLLUTION INVENTORY

Road construction has by its nature a limited list of typical pollution types which require consideration. Below is a list of Polluting Substance Storages/Uses for the Newell Highway Upgrade at Parkes with the estimated Maximums stored.

Potential Pollutant	Location on Site	Type of Containment	Maximum Quantity On Site
Sediment laden surface water	sediment basins and traps identified on ESCPs	Excavations, sediment basins, sediment traps	N/A
Dust	Entire earthworks footprint	Dust suppression, stabilisation measures	N/A
Chemicals - mixed	Site compound	Bunded container	5000L
Concrete wash out	Temporary locations, moved with the construction works	Lined bunds or skip bins	N/A



Figure 1- Project Location

3. SAFETY DEVICES

Spill Kits are located at all chemical storage locations. Fire extinguishers are located at the site compound facility, chemical storage areas and within all heavy mobile plant. The chemical storage area will consist of a bunded chemical storage container at the main compound.

4. RISK ASSESSMENT

The below is a high level risk assessment summarising the hazards associated with road construction that have the potential to cause or threaten material harm to the environment as well as the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment

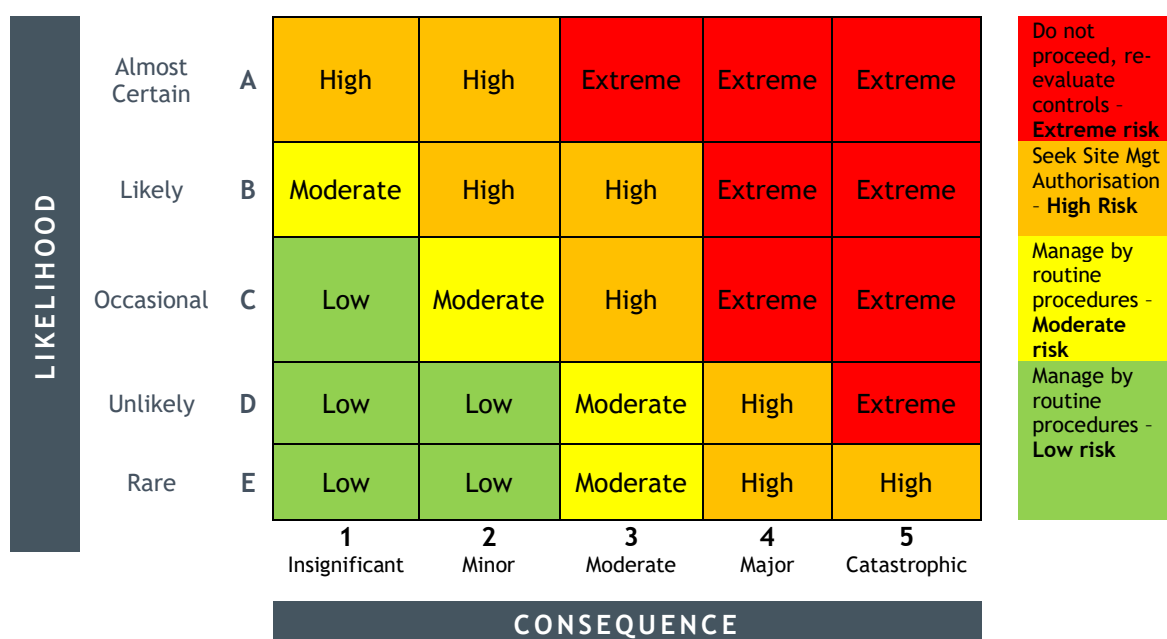
HAZARD	Impact (Human Health and/or Environment)	Inherited Risk Level (A, B, C, D or E)	Pre-emptive Actions	Residual Risk Level (A, B, C, D or E)
Sediment laden water off site - examples; basin embankment failure, dewatering pump incident	Environment	A3	<ul style="list-style-type: none"> Construction Environmental Management Plan Soil and Water Management Plan Environmental Work Method Statements Implement controls identified on ESCPs procedures for dewatering Inspections and monitoring completed via Beakon DHI Environment 	C3
Pollution of land or water from service strike of sewer or water mains	Human Health and/or Environment	A3	<ul style="list-style-type: none"> Excavation permits utilising before You Dig Australia (BYDA) positive field identification of all existing services with suction truck Identified services clearly marked in field JHAs include service strike risks and controls 	D3
Pollution of land or water from Hydrocarbon spills from machinery or fuel storage.	Human Health and/or Environment	A2	<ul style="list-style-type: none"> Plant Hazard Assessments Daily Plant Checklists; Environmental Work Method Statements for high risk works Environmental Management Plan (CEMP) Inspections and monitoring completed via Beakon DHI Environment 	D3
Generation of dust from mobile equipment / vehicles and exposed areas	Human Health and/or Environment	A3	<ul style="list-style-type: none"> Air Quality Management Plan Soil and Water Management Plan Reduced speed limits for haulage routes on exposed soils Water Dust suppression in earthworks areas Haulage trucks to cover loads Inspections and monitoring completed via Beakon DHI Environment Environmental monitoring 	D3

Pollution Incident Response Management Plan

Newell Highway Upgrade at Parkes - Parkes Bypass



Impacts to residents due to noise, vibration and visual pollution.	Human Health and/or Environment	A2	<ul style="list-style-type: none"> Comply with approved hours of construction. Comply with EPL conditions and Construction Noise and Vibration Plan Communicate with staff and community the approved hours of work Program high noise activities for standard construction hours and apply required respite periods. Inspections and monitoring completed via Beakon DHI Environment Environmental monitoring 	C2
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**When assessing risk, maximum reasonable consequence should always be established prior to assessing likelihood.*

Consequence Rating	Insignificant	Minor	Moderate	Major	Catastrophic
People	Report Only, No Injury	First Aid Injury (FAI)	Recordable Injury (MTI, RWI, LTI < or equal to 10 consecutive shifts off work)	Lost Time Injury (LTI >10 consecutive shifts off work)	Permanent Disabling Injury Fatality/Multiple Fatalities
Environment	Report Only, no evidence of environmental impact	Pollution or degradation confined within the site that has a minor immediate impact and is fully reversible with no residual impact	On-site and/or Off-site Pollution or degradation which has moderate immediate impact and potential residual impacts up to 1 month	On-site and/or Off-site Pollution or degradation which has high immediate impact and potential residual impacts for 1 - 6 months.	On-site and/or Off-site pollution or degradation that has severe and widespread impacts that persist for greater than 6 months

Plant/Property	Damage assessment <\$5K	Damage Assessment \$5K - \$20K	Damage assessment \$20K - \$100K	Damage assessment \$100K - \$500K	Damage assessment >\$500K
Community	Complaint at once resolved / no media enquiry	Small no. Of Complaints / low cost / local community media attention	Repeated complaints from same area, state/ media interest	Community discontent & impact on viability of business / National media attention	Complete loss of trust/social unrest/dissention & likely closure of business/ National media attention
Legal Compliance	Compliant with all relevant legal conditions	Minor non - compliance with development approval, licence or permit not resulting in formal regulator response	-Incident reportable to regulatory authority -Regulatory response in the form of; Formal warning Advisory Letter Penalty infringement notice	Prosecution -Penalty infringement notice >\$10K -Suspension or revocation of operating authority -Enforceable undertakings	Prosecution -Criminal court orders including injunctions -Environmental protection orders

Likelihood		Description	Example
Almost Certain	A	Is expected to occur in most circumstances/Common or repeating occurrence	Multiple occurrences within a month
Likely	B	Will occur in most circumstances	Multiple occurrences within a year
Occasional	C	Could occur infrequently	1-10 year event
Unlikely	D	May occur/improbable	10-100 year event
Rare	E	Only in exceptional circumstances, practically impossible	100+ year event

5. POLLUTION SCENARIOS AND COMMUNICATION TO NEIGHBOURS

The following table lists the mechanisms to be followed in the event that a pollution incident has the potential to impact the surrounding community.

Pollution Scenario	Potential impacts	Early Warning Actions
Hydrocarbon and chemical spills	<ul style="list-style-type: none"> Water quality issues if spill enters waterway Land contamination Community complaints 	<ul style="list-style-type: none"> In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with Combat agency.
Sediment	<ul style="list-style-type: none"> Water quality issues if spill enters waterway Community complaints 	<ul style="list-style-type: none"> In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Dust	<ul style="list-style-type: none"> Air quality issues Loss of amenity Community complaints 	<ul style="list-style-type: none"> In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice

Noise	<ul style="list-style-type: none"> • Loss of amenity • Community complaints 	<ul style="list-style-type: none"> • Not required under PIRMP. • Communicate with neighbours on as needs basis as per CNMP
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6. PIRMP ACTIVATION AND NOTIFICATION

The Environmental Site Representative and Superintendent are the responsible persons available 24 hours to activate and notify under the PRIMP. The Superintendent is responsible for the initial incident response and the Environmental Site Representative is responsible for the notification requirements. See Emergency contacts section for contact details. The Environmental Site Representative will make a decision based on RMS Environmental Incident Classification and Reporting Procedure what level of notification and callout is initially required for the incident.

The Environmental Site Representative or delegate will immediately notify the authorities listed in the below table of pollution incidents on or adjacent to the site where material harm to the environment is caused or threatened. That is, environmental harm or potential harm to the health or safety of human beings (from environmental hazards) or to ecosystems that is not trivial; or that result in actual or potential loss or property damage of an amount over \$10,000.

EMERGENCY CONTACT / ORGANISATION	CONTACT DETAILS
EPA Pollution Hotline	131 555
NSW Fire and Rescue	000 (EMERGENCY) 1300 729 579 (NOT AN EMERGENCY)
NSW Ministry of Health (Western NSW Local Health District - Dubbo)	02 6809 8600
WorkCover Authority	131 050
Parkes Shire Council	General Enquiries: 02 6861 2343 After Hours Emergencies: 1800 648 585

7. INCIDENT INVESTIGATION

In the event of an environmental incident, TfNSW's Environmental Incident Classification and Reporting Procedure will be implemented. All incident investigations shall include the following basic elements:

- identify the cause of the incident;
- identify the necessary corrective action(s);
- identify personnel responsible for carrying out corrective action(s);
- implement or modifying controls necessary to avoid repetition;
- Record any changes in written procedures required

Advising the environmental authority (i.e. EPA) of the investigation findings and corrective actions associated with any reportable pollution events.

8. INCIDENT RESPONSE PROCEDURE FLOWCHART



11. SPILL PREVENTION MEASURES

The following sections on Spill Management have been developed in accordance with the Code of Practice for Water Management (RTA, 1999) and relevant EPA guidelines.

All fuels, chemicals, and liquids will be stored at least 50 m away from waterways (including existing stormwater drainage systems) and flood prone areas and will be located on relatively flat land (<1:10 grade). Storage will be in bunded areas with an impermeable floor and of a size able to contain 120% of the volume of the largest single stored container within the bund in accordance with EPA “Bunding and Spill Management Guidelines” contained within EPA “Environmental Protection Manual for Authorised Officers”. Georgiou will regularly inspect bunded areas for rainwater volumes to ensure that there is sufficient capacity available in the event of a spill or leak. All chemical storage areas will have adequate spill response materials in the form of spill kits.

Dangerous goods and hazardous materials will be stored, handled and disposed of in accordance with suppliers’ instructions, Australian Standards, the WHS Act, Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW, 2005) and other relevant guidelines. Georgiou will obtain Safety Data Sheets (SDS) for dangerous goods and hazardous substances prior to their arrival on site. Georgiou will maintain a register of all hazardous materials stored on site including SDS. The register will contain information on the materials, their location and method of storage.

The Contractors will undertake daily inspections of all plant and equipment on site for leaks of fuel, oil or hydraulic fluid. Leaks will be repaired prior to re-use of the plant or equipment. Georgiou will implement a vehicle, plant and machinery maintenance routine to minimise risk of leaks.

The refuelling and maintenance of land-based plant and equipment will be undertaken in a designated areas where spill kits are available. Refuelling will not be undertaken within 50 m of any waterway. Refuelling activities will be supervised at all times. Vehicle wash downs and concrete washouts will be carried out within designated bunded areas located at least 50 m from any waterways and areas prone to flooding.

Road and bridge building activities that require the curing of concrete and bitumen will be planned for dry weather events and will include the provision of controls for the capture and filtering of all chemicals that may runoff. Saw cutting of pavements and concrete structures will also include the installation of controls to prevent any runoff to stormwater drains and systems.

12. SPILL RESPONSE PROCEDURE

Clean-up of Spills/ Leaks Procedure	
Description:	<p>This procedure provides guidance for clean-up of chemical spills and leaks and establishes minimum requirements and performance for employees when responding to spills.</p> <p>A 'Spill/ Leak' is defined as an unintentional release of a chemical/fuel/oil, which does not leave the site. It includes spillages to soil and hard surfaces.</p> <p>Examples of hydrocarbon and chemical spills that apply to this procedure;</p> <ul style="list-style-type: none"> • during the Refuelling or maintenance and cleaning of plant and equipment including concrete agitators, bitumen spray bars and asphalt pavers • during application of concrete and asphalt • during application of liquid membranes, including paint and thermoplastic, resin, emulsion, precoat agent and curing compound; • during bulk fuel or chemical deliveries; • during removal and disposal of excess chemicals and water used for washing down of equipment; • During decanting operations such as for fuel, chemicals and bitumen.
Risks/issues:	Chemical/fuels/oils spills may cause harm to workers health and the environment if not managed and cleaned up appropriately.
Steps To Follow	
1 ASSESS THE SITUATION	
<ul style="list-style-type: none"> • Before clean-up, assess the potential risk to your safety, the safety of those working around you, and the environment. • Depending of the type and quantity of material spilled, determine if it can be deal with by (an) individual(s) or if you need external assistance (i.e. Fire brigade - refer to emergency contact list if needed). • Advise or alert the other personnel so they can assist you if necessary. • STOP the source of the spill if it is SAFE to do so. 	
2 SECURE	

- Make the site safe for all personnel and the general public.
- Monitor and control access where the spill occurs (i.e. tape, barrier) in order to prevent personnel from being contaminated and the contamination from being spread by traffic movement.

3 Personal Protective Equipment

- Prior to any clean-up, consult the relevant MSDS for the chemical/fuel/oil to determine the required personal protective equipment.
- No clean-up work should occur without the correct personal protective equipment.

4 CONTAIN

- Contain the spill using the spill response equipment in the spill kit such as spill booms, drain covers and bunding.
- For larger spills additional containment may be required e.g. earth bunding formed with excavator, sand bagging.
- For spills on water, a containment boom or hydrophobic boom should be deployed.

5 CLEAN UP

- Once the spill is contained, convert it to a solid by absorption or for larger spills engage a suction truck to vacuum the spill.
- Use the appropriate absorbing pads or absorbent (according to the type of material spilled) to soak up the spill by placing them over the liquid.
- Remove the saturated pads and replace as necessary. On porous surfaces, sprinkle loose absorbent over the spill and broom through until surface appears dry.
- Recover any free liquid into purpose-built tankers if possible.

6 DISPOSE

- Place the spent absorbent in the appropriate disposal bags and seal them.
- The contaminated material placed in the disposal bags must not contain free liquids in order to be disposed in a normal bin. If free liquids are observed, additional absorbent materials should be used.
- Refer to the SDS for appropriate clean-up. Correctly dispose of contaminants off-site using a licensed contaminated waste disposal contractor or place in trade waste, if applicable.
- Contaminated soil should be removed to an appropriate facility following consultation with the ESR (Refer to Waste Management Sub Plan)
- For larger spills removed with suction trucks, the material is to be disposed at a licenced facility as liquid waste.
- All wastes removed from site are to be classified and managed in accordance with the NSW EPA waste classification guidelines.

7 REPORT

- Notified the ESR and Project Manager.
- The ESR is responsible for notifying the client and appropriate agencies and groups
- Document the incident using the Incident Investigation Report form.

8 RESTOCK

- Order and replace used up personal protective equipment and absorption materials in the spill kits