

Pollution Incident Response Management Plan



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.

Sections 1 and 2 of this plan must be made available on the company's website no later than 14 days after being prepared and approved for issue.

1) External Notification Protocol

The following authorities must be contacted in the order below immediately for pollution incidents that threaten or cause material harm to the environment. **This means promptly and without delay.**

	Authority	Phone Number
1	EPA Hotline	13 15 55
2	EPA (EPA Officer)	(02) 9995 6816
3	Ministry of Health – via the local Public Health Unit	http://www.health.nsw.gov.au/publichealth/Infectious/phus.asp
4	Workcover NSW	131 050
5	Local Authority – Parramatta City Council (PCC)	(02) 9806 5050
6	Fire and Rescue NSW	000

2) Community Notification and Action Protocol

The following table 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.

Pollution Incident Scenario	Potential Impacts	What to do	Who to Notify	When	Communication Mechanism
Sediment laden water, hydrocarbon or chemical entering stormwater drain	People and waterways	Bund area and block stormwater drain to prevent further pollution	Parramatta City Council, EPA	Immediately during clean-up of incident	Door knock Telephone
Dust/Odours	Air quality issues, loss of amenity	Cease works immediately	Parramatta City Council, adjacent businesses and school	Immediately whilst applying mitigation measures	Door knock Telephone

3) Risk Assessment

Hazard	Impact (Human Health &/or Environment)	Inherited Risk Level	Pre-emptive Actions	Residual Risk Level
Sediment laden water off site, including mud tracked onto roadways	Environment	D	- Construction Environmental Management Plan (CEMP) - implement controls identified on ESCPs - procedures for dewatering	E
Pollution of land or stormwater from hydrocarbon spills from machinery or fuel storage	Human Health and/or Environment	D	- Plant Hazard Assessments - Daily plant checklists - CEMP	E
Generation of dust from mobile equipment/vehicles and exposed areas	Human Health and/or Environment	C	- traffic movement onsite no greater than 10km/h - dust suppression on site at all times - trucks to cover loads	D
Impacts to local receivers (High School, Library, businesses) due to noise, vibration and visual pollution	Human Health and/or Environment	C	- comply with approved construction hours - communicate with staff and community the approved hours of work - program high noise activities for standard construction hours and apply required respite periods	D

Likelihood rating	Almost Certain	D	C	B	A	A
	Likely	D	D	C	B	A
	Possible	E	D	C	C	B
	Unlikely	E	E	D	C	B
	Rare	E	E	D	D	C
		1	2	3	4	5
Consequence rating						

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"

Risk Consequence Rating

Rating	Environment & Heritage	Reputation & Community	Regulatory
5	<ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery in 5 to 10 years • Detrimental impact on one or more protected/ endangered flora or fauna with functional recovery in 5 to 10 years 	<ul style="list-style-type: none"> • National press reporting for a day • Consistent and extreme local negative media attention (month) • Significant adverse community impact & condemnation • Stakeholder action will prevent achievement of the project objectives • Manager may be asked to leave 	<ul style="list-style-type: none"> • Major breach of regulation with punitive fine. • Significant litigation involving many weeks of senior John Holland management time. • Shut down of whole project for short period due to regulatory breach.
4	<ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery in 1 to 5 years • Detrimental impact on one or more protected/endangered flora or fauna with functional recovery in 1 to 5 years 	<ul style="list-style-type: none"> • Consistent local negative media attention (weeks) • Considerable and prolonged adverse community impact and dissatisfaction publicity expressed. • Stakeholder action will prevent achievement of major elements of the Project. • Disciplinary action likely 	<ul style="list-style-type: none"> • Breach of regulation with investigation or report to authority with prosecution and/or moderate fine possible. • Shut down of part of a project due to regulatory breach
3	<ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery within 1 year. • Detrimental impact on a protected/ endangered flora or fauna with functional recovery within 1 year • Significant irreversible detrimental impact that is contained on-site 	<ul style="list-style-type: none"> • Negative local media attention (days) • Sectional community impacts and concerns publicly expressed (days) • Stakeholder action will disrupt planned project activities. • Disciplinary action may be taken 	<ul style="list-style-type: none"> • Legal issues due to non-compliances and breaches of regulation.
2	<ul style="list-style-type: none"> • Significant detrimental impact that is contained on-site and is fully reversible 	<ul style="list-style-type: none"> • Brief negative local media coverage • Minor stakeholder complaints resolved by initial contact. • Employees warned only 	<ul style="list-style-type: none"> • Technical breach of regulation
1	<ul style="list-style-type: none"> • Negligible detrimental impact that is contained on-site and is fully reversible 	<ul style="list-style-type: none"> • No negative coverage • Complaints but no action required 	<ul style="list-style-type: none"> • Non compliant action

4) Pollutant Inventory

Potential Pollutant	Location on Site	Type of Containment	Maximum Quantity On Site
Sediment laden surface water	All exposed areas	Excavation	N/A
Dust	All exposed areas	Demolition/Excavation	N/A
Chemicals/Hydrocarbons	Designated area within site compound	Bunded container	1000L

5) Site Environmental Plan

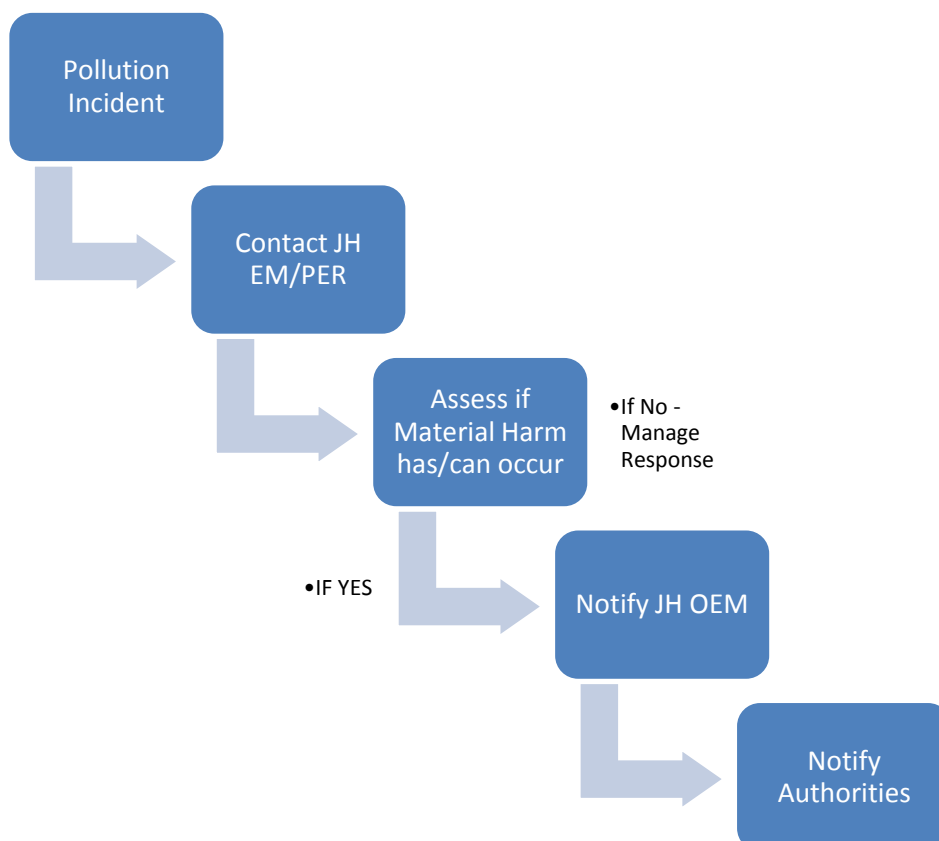
The SEP will detail the following

- Location of all potential pollutants
- Location of pollution response equipment
- The surrounding area that is likely to be affected by a pollution incident
- The location of any stormwater drains on the premises

6) Pollution Incident Management

Internal Notification

(JH John Holland, EM Environmental Manager, PER Project Environmental Representative, OEM Operational Environmental Manager)



External Notification

If material harm has occurred, the external notification protocol will be implemented as per section 1.

Early Warning

Communication to the surrounding community will be carried out as per Section 2 if a pollution incident has the potential to cause impact.