

Sydney Program Alliance

WFU

Pollution Incident Response Management Plan

DOCUMENT CONTROL

APPROVAL AND AUTHORISATION

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INTERNAL REVIEW

	NAME	POSITION	DATE	SIGNED
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Glossary/Abbreviations

Abbreviations	Expanded text
Ancillary facility	A temporary facility for construction of the project including an office and amenities compound, construction compound, material crushing and screening plant, materials storage compound, maintenance workshop, testing laboratory, material stockpile area, car parking compound and truck marshalling facility.
AQMP	Air Quality Management Procedure
ARA	Appropriate regulatory authority
CCS	Community Communications Strategy
CEMP	Construction Environmental Management Plan
CoA	NSW Minister for Planning's Conditions of Approval
Contractor	Sydney Program Alliance
CUT	Critical utility relocation, installation and protection
EIS	Environmental Impact Statement
ESCPs	Erosion and Sediment Control Plans
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
EWMS	Environmental Work Method Statements
FFMP	Flora and Fauna Management Procedure
HAZMAT	Hazardous Materials
HMP	Heritage Management Procedure
Impact	The result of an action that has, will have, or is likely to have an adverse effect to the environment relevant to the CoA controlling the action.
Incident	<p>An occurrence or set of circumstances that causes, or threatens to cause, material harm to the environment, community or any member of the community, being actual or potential harm to the health or safety of human beings or to threatened species, endangered ecological communities or ecosystems that is not trivial</p> <p>Note: "material harm" is also defined separately in the SSI 7485 approval for the purpose of compliance with that approval.</p>
LGAs	Local Government Areas
Material harm to the environment	<p>Defined in section 147 of the POEO Act as:</p> <p>(a) harm to the environment is material if:</p> <ul style="list-style-type: none"> (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and <p>(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.</p>
Non-compliance	An occurrence, set of circumstances or development that is a breach of the Conditions of Approval but is not an incident.
Non-conformance	Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation
NVMP	Noise and Vibration Management Sub-plan
PIRMP	Pollution Incident Response Management Plan (this document)

Pollution Incident	A pollution incident means 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.
Project, the	Western Harbour Tunnel and Warringah Freeway Upgrade project
POEO Act	Protection of the Environment Operations Act 1997
POEO (G) Regulation	Protection of the Environment Operations (General) Regulation 2009
Proponent	The person identified as the proponent in Schedule 1 of the Infrastructure Approval (TfNSW)
Relevant Authority	For the context of this plan, as defined in Section 148 of the POEO Act means any of the following: (a) the appropriate regulatory authority, (b) if the EPA is not the appropriate regulatory authority--the EPA, (c) if the EPA is the appropriate regulatory authority--the local authority for the area in which the pollution incident occurs, (d) the Ministry of Health, (e) SafeWork NSW as referred to in clause 1 of Schedule 2 to the Work Health and Safety Act 2011, (f) Fire and Rescue NSW.
Relevant council(s)	Any or all as relevant, North Sydney Council and Willoughby Council
REMM	Revised Environmental Management Measures
RtS	Response to Submissions Report
Secretary	Secretary of the NSW Department of Planning and Environment or nominee, whether nominated before or after the date on which this approval was granted
SEMP	Site Establishment Management Plan
SPA	Sydney Program Alliance
CSSI	Critical State Significant Infrastructure
SWMP	Soil Water Management Procedure
TfNSW	Transport for New South Wales
The PIRMP Guidelines	Environmental guidelines: Preparation of pollution incident response management plans (Environmental Protection Authority, 2012)
TTAMP	Traffic, Transport and Access Management Sub-plan
WRMP	Waste & Resources Management Procedure
Works	All physical activities to construct or facilitate the construction of the CSSI, including installation of environmental management measures and utility works

Contact Details

Environmental Incident Notification Details:

NAME	TITLE	DETAILS
RELEVANT PROJECT STAFF		
ALYCE HARRIGTON	ENVIRONMENT MANAGER	0409 633 908
AMANDA MUIR	COMMUNITY MANAGER	0499 542 816
STEPHEN O'BRIEN	SAFETY MANAGER	0417 871 683
JASON NISBET	PROJECT MANAGER	0418 693 964
JOHN COSGRAVE	SUPERINTENDENT	0419 717 529

Contact details if Section 147 of the POEO Act is triggered:

Relevant Regulatory Authorities and Agencies	Phone (24 hours unless specified)
Emergency Services if the incident presents an immediate threat to human health or property (Police, Fire & Rescue, Ambulance, HAZMAT)	000
NSW EPA	131 555
NSW Health – Public Health Unit – Northern Sydney Local Health District	1300 066 055
Fire and Rescue NSW	Standard hours: (02) 9265 2999 After hours: 000
North Sydney Fire Station	(02) 9436 2021
SafeWork NSW	131 050
North Sydney Council	Standard hours: (02) 9936 8100



1. Introduction

1.1. Background

This Pollution Incident Response Management Plan (PIRMP or the Plan) has been prepared by Sydney Program Alliance (SPA) to identify and manage the risk of pollution incidents and facilitate a coordinated management response to pollution incidents during the construction of the Western Harbour Tunnel and Warringah Freeway Upgrade Project (the Project) Early Works (i.e. Stage 1A, 1B and 1C).

The Plan has been prepared in accordance with the Environment Protection Authority (EPA) Guideline: Pollution Incident Response Management Plans 2020 (the PIRMP Guidelines), as evidenced in Appendix A. This document has also been prepared to align with the Roads and Maritime Services “Environmental Incident Classification and Reporting Procedure” (November 2018) under which environmental incidents on the Project are to be managed and reported in accordance with.

This PIRMP document has been developed to satisfy requirements of the *Protection of the Environment Operations Act 1997* (POEO Act) and covers the Project premises under which the Environment Protection Licence (EPL) 21528 obtained for the Scheduled Activity “Road Construction” (<50,000T ; 0-10 kilometres).

The specific requirements for PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation). These requirements were introduced through Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.

The general requirement is to prepare, keep, test and implement a pollution incident response management plan. A summary of the specific requirements outlined in the legislation are:

- Holders of an EPL must prepare a PIRMP (Section 153A, POEO Act)
- The Plan must include the information detailed in the POEO Act (Section 153C) and be in the form required by the POEO (G) Regulation (clause 98B)
- Licensees must keep the Plan at the premises to which the EPL related or in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (Section 153D, POEO Act)
- Licensees must test the Plan annually in accordance with the POEO (G) Regulation (Clause 98E)
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan (Section 153F, POEO Act)
- If a pollution incident occurs during the course of Project activities so that material harm to the environment is caused or threatened, licensees will immediately implement the plan (Section 153F, POEO Act).

1.2. Objectives

The primary purpose of the Plan is to identify and manage the risk of pollution incidents, plan the Project response to pollution incidents, and facilitate coordination with the relevant authorities.

The objectives of the Plan are to:

- Minimise and control the risk of a pollution incident at the premises of the Project through the early identification of risks and the development of planned actions to minimise and manage those risks
- Ensure timely communication about pollution incidents to construction personnel, the EPA, relevant response agencies/authorities and the community who may be affected by the impacts of a pollution incident

- Ensure that the Plan 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.

1.3. Scope

This Plan applies to the premises defined in the EPL 21528 obtained for the Scheduled Activity "Road Construction" (refer to Appendix B). This Plan does not cover activities that occur off site on premises that are not under the control of the SPA.

A pollution incident is defined in the PIRMP Guidelines to be: *"an incident or set of circumstances during or as a consequence of which there is or likely to be a leak, spill or other escape or deposit or 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."*

For details regarding response to emergencies refer to the Project Emergency Response Plan and the Workplace Health and Safety Management Plan. For details regarding specific environmental controls refer to the Construction Environmental Management Plan (CEMP) Sub-plans such as the Noise and Vibration Management Sub-Plan. For details regarding classification, response and notifications of incidents that do not meet the mandatory notification criteria defined in the POEO Act as well as client and proponent notification requirements, please refer to the CEMP. If statutory notification is given to the EPA as required under the POEO Act in relation to the Project, such notification must also be provided to the Planning Secretary via the Major Project Website immediately after becoming aware of an incident, in accordance with the Condition of Approval (CoA) A43.

1.4. Pollution incidents that are to be notified

A pollution incident is considered notifiable under the POEO Act if there is a risk of causing or threatening "material harm to the environment". "Material harm to the environment" is defined in Section 147 of the POEO Act as:

- (a) Harm to the environment is material if:
 - (i.) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii.) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

A pollution incident that threatens or causes material harm to the environment requires immediate notification to the EPA and appropriate regulatory authorities (ARA). Each of the following response agencies needs to be notified of pollution incidents immediately in the following order, so that action can be coordinated to prevent or limit harm to the environment and human health generally:

- Appropriate regulatory authority (ARA)
- Environment Protection Authority (EPA) if they are not the ARA
- NSW Ministry of Health, local Public Health Unit
- WorkCover NSW
- North Sydney Council if they are not the ARA
- Fire and Rescue NSW.

Pollution incidents that could potentially occur at a construction site and are covered by this Plan include:

- Material, such as waste material, concrete, fuels etc, that travel beyond the site boundary causing or potentially causing adverse impact to the environment or community
- Discharge of waters from site not in accordance with the requirements of the Project EPL.

Incidents are that are not considered to threaten or cause material environmental harm will be recorded and reported in accordance with client and/or organisational requirements as outlined in the CEMP.

2. Project Details

2.1. Project Location

The location of the Project and premises to which this Plan applies are shown in Figure 2-1 (A-D), detailed in Table 2-1 and in Appendix B.

Relevant details regarding the environmental and social context, (namely the applicable local government areas (LGAs), catchments, and sensitive receivers) in proximity to the Project premises subject to the EPL requirements, have been summarised on a site-specific basis in Table 2-1.

The Project is located within the North Sydney Council LGA. The Project premises which are subject to the EPL occupy the areas within the Sydney Harbour catchment. Project premises and these catchment areas are further divided into the relevant sub-catchments Anderson Park, Willoughby Creek and Milson Park catchments.

Sensitive receivers and places as defined within the Transport for New South Wales (TfNSW) QA Specification G36 have been identified in the Community Communications Strategy (CCS) prepared for the project and summarised in Table 2-1.

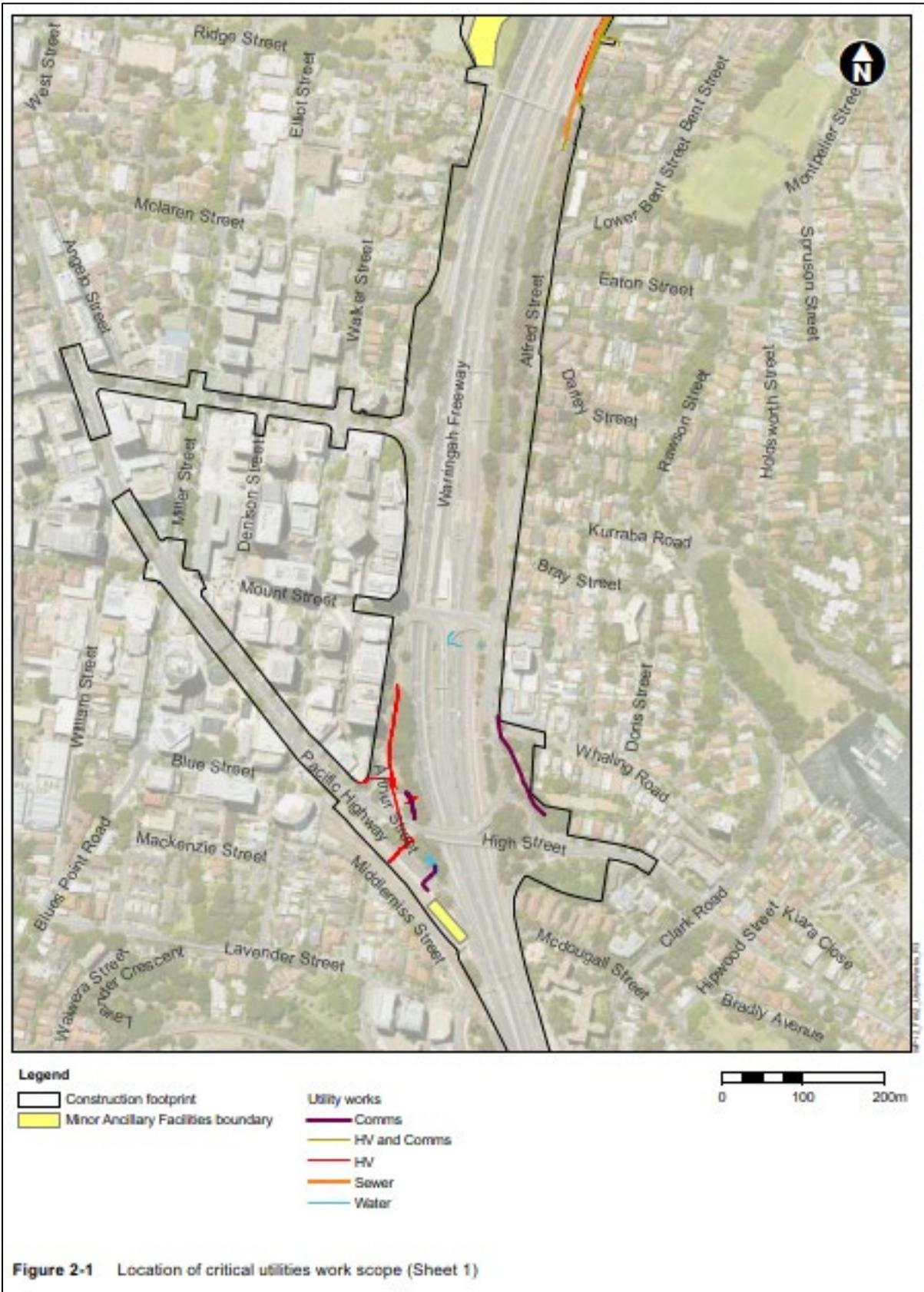


Figure 2-1 (A) Project location overview (Stage 1A)

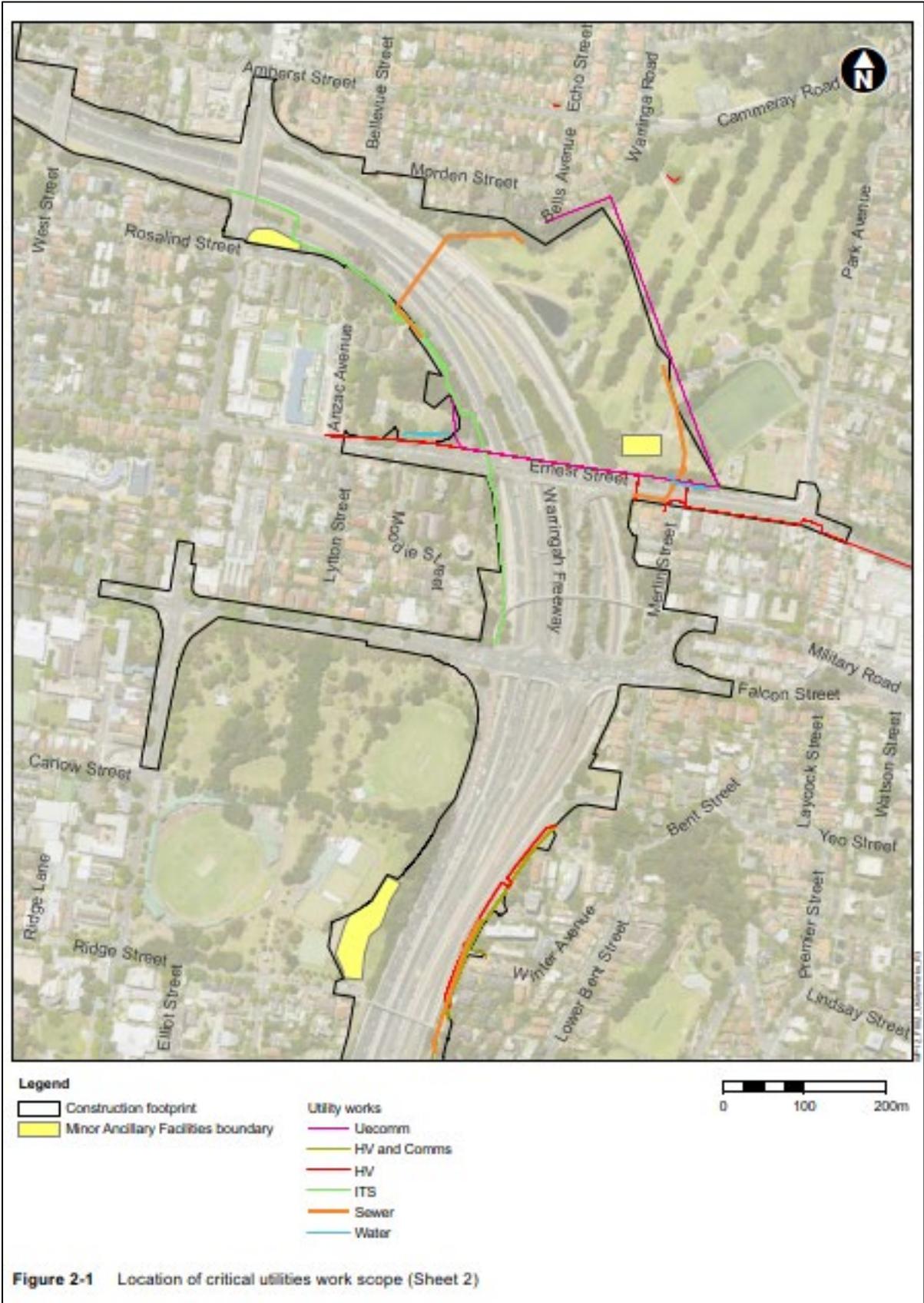


Figure 2-2 (B) Project location overview (Stage 1A)



Figure 2-4 (D) Project location overview (Stage 1C)

Table 2-1 Project Catchments, Local Government and Sensitive Receivers relative to Project sites

Construction ancillary facility	Catchment	Sub-catchment	LGA	Schools and childcare centres within 500m of the site	Other
Ridge Street North	Sydney Harbour	Anderson Park Catchment	North Sydney Council	<ul style="list-style-type: none"> • Wenona • North Sydney Boys High • Monte Saint Angelo • Ridge Street Kids Club • KU Grandstand Kids Care • Goodstart Early Learning North Sydney 	<ul style="list-style-type: none"> • Stanton Library • St Marys Church • PCYC North Sydney
				•	•
Cammeray Golf Course	Sydney Harbour	Willoughby Creek Catchment	North Sydney Council	<ul style="list-style-type: none"> • Anzac Park Primary School 	<ul style="list-style-type: none"> • Sydney Life Church • PCYC North Sydney
				•	•

2.2. Mapping

Maps of each Project site and surrounding areas are included in Appendix B and demonstrate:

- Environmentally sensitive areas surrounding each project site that are likely to be affected by a pollution incident
- Potentially affected communities
- The location of potential pollutants on each premise
- The locations of any stormwater drains on site and drainage catchments surrounding the premises
- Storage locations for hazardous materials and pollution hazards.

3. Prevention

3.1. Risk Assessment

A risk assessment has been prepared to identify and assess environmental aspects associated with the activity relative to the EPL, and to implement appropriate mitigation strategies to minimise the likelihood of environmental risks or incidents associated with each aspect. The risk management process involved an assessment of all specific activities/aspects in or near environmentally sensitive areas and resulted in the development of a list of environmental risks (effects and impacts) and a corresponding risk mitigation strategy and risk ranking. Each environmental risk was categorised, based on the following:

- The environmental aspect
- Relative scale of the potential impact
- Type of potential impact
- Likelihood of occurrence.

The identification of risks included a review of the proposed works, the CoA, REMMs, and review of the environmental risks identified by the EIS and subsequent SPIR. The risk matrix identified in Table 3-1 has been used to undertake the risk assessment located in Table 3-2.

Table 3-1 Risk assessment matrix

Risk Classification = Consequence x Likelihood	Likelihood				
	5 Very High	4 High	3 Medium	2 Low	1 Very Low
5 Very Large	Critical	Significant	Significant	Moderate	Minor
4 Large	Significant	Significant	Moderate	Minor	Minor
3 Medium	Significant	Moderate	Moderate	Minor	Minor
2 Small	Moderate	Minor	Minor	Minor	Negligible
1 Very Small	Minor	Minor	Minor	Negligible	Negligible

Table 3-2 Classification of Likelihood and Consequences

Level	Categorisation of Likelihood	Description
Very Low	Highly unlikely to occur in the identified circumstances without any controls in place	Rare, only occur in exceptional circumstances, < 1% probability
Low	Could occur at some time in the identified circumstances without any controls in place but not expected	Could occur at some time during the project, ~1% probability
Medium	May occur in the identified circumstances without any controls in place	Might occur at some time during the project, ~10% probability
High	Strong anecdotal evidence that is likely to occur in the identified circumstances without any controls in place	Will probably occur during the project, ~50% probability
Very High	Almost certain to happen i.e. could occur daily or more frequently	It expected to occur during the project, 90% or > probability
Level	Categorisation of Consequence	Description
Very Small	Reversible and Insignificant Environmental impact	Negligible Discharge
Small	Treatable on-site impact with clean up or remedy work incurring a small level of effort	Uncontrolled Discharge in Minor Quantities

Medium	Moderate on-site and/or off-site impacts (but no significant irreversible damage) with clean up or remedy work incurring a moderate level of effort	Moderate Breach of Environmental Statutes
Large	Major on-site and/or off-site impacts with clean up or remedy requires significant effort	Major Breach of Environmental Statutes
Very Large	Major Irreversible environmental harm on-site and/or off-site damage	Showdown of Project Due to Environmental Breach

In accordance with Project requirements a risk assessment workshop was undertaken which identified significant construction activities and associated risks to the environment that could eventuate during construction of the Project.

A summarised risk assessment is included in Table 3-3 which demonstrates key activities that risk causing pollution, the impacts of potential pollution, corresponding mitigation measures and risk categories prior to and following the application of mitigation measures.

Refer to Appendix D for an inventory that outlines the types and estimated quantities of dangerous goods and hazardous substances that are likely to be transported, stored and used within the construction ancillary facilities, as well for construction activities elsewhere in the Project footprint. For specific details on the product, chemicals and associated SDS's please refer to the Hazardous substances register "SPA RWK SDS Register 020622" located in the sharepoint folder. Refer to Appendix A2 of the CEMP for the detailed risk assessment which includes the full suite of Project activities and impacts including those not associated with pollution.

Table 3-3 Risk Assessment

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
Air Quality	<ul style="list-style-type: none"> General construction activities (no major earthworks or excavation anticipated) Utility works and relocation 	<ul style="list-style-type: none"> Generation of dust due to cutting/grinding/sawing equipment, material /waste/spoil handling; and generation of exhaust emissions due to inappropriate plant maintenance Generation and mobilisation of dust impacting receivers including residents, businesses, vegetation and habitats 	8 (minor)	<p>Direct:</p> <ul style="list-style-type: none"> Construction activities with the potential to generate dust will be modified or ceased during unfavourable weather conditions to reduce the potential for dust generation Access roads within Project sites will be maintained and managed to reduce dust generation Storage of materials that have the potential to result in dust generation will be minimised within Project sites at all times During high wind and/or dry conditions, programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties Demolition activities will be planned and carried out to minimise the potential for dust generation Adequate dust suppression will be applied during all demolition works required to facilitate the Project <p>Indirect:</p> <ul style="list-style-type: none"> Other measures outlined in the Air Quality Management Procedure (AQP) 	6 (minor)	Air Quality Management Procedure (AQP)
Biodiversity	<ul style="list-style-type: none"> Vegetation clearance 	<p>Clearing outside of an approved area, including:</p> <ul style="list-style-type: none"> Accidental clearing outside of the project boundaries 	8 (minor)	<p>Direct:</p> <ul style="list-style-type: none"> Toolbox talks regarding clearing limits Clearly delineate the Project footprint prior to clearing <p>Indirect:</p>	6 (minor)	Flora and Fauna Management Procedure (FFP)

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
		<ul style="list-style-type: none"> Accidental clearing beyond the requirements of the Project Approval Accidental lopping of trees and/or damage to tree roots Accidental clearing of threatened species or threatened ecological communities outside of the project boundary 		<ul style="list-style-type: none"> Engage an arborist to supervise works where impact or damage to tree roots is probable Provide tree protection where required at the direction of the arborist Other measures outlined in the Flora and Fauna Management Procedure (FFP) 		
	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Spreading of weeds in stockpiled material	8 (minor)	Direct: <ul style="list-style-type: none"> Implement a weed management procedure. Indirect: <ul style="list-style-type: none"> Other measures outlined in the FFP 	6 (minor)	Weed Management Procedure (within FFP)
Contamination	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Contamination of soil or water from spill or leak of dangerous or hazardous materials from plant / equipment	10 (moderate)	Direct: <ul style="list-style-type: none"> The use of any hazardous substance that could result in a spill will be undertaken away from drainage or stormwater lines and, wherever possible, within defined bunds Any refuelling undertaken on site shall be undertaken in designated areas only, outside of riparian areas and well away from stormwater system inlets All spills or leakages will be immediately contained and absorbed Spill containment kits and drainage controls will be placed at locations where there is direct discharge of stormwater to receiving waterways 	3 (minor)	Soil and Water Management Procedure (SWP)

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				<ul style="list-style-type: none"> All sites are hardstand Inspection regime of bulk storage facility Undertake Detailed Site Investigations at any locations identified as having moderate or high risks of contamination in accordance with CoA E115 Indirect: <ul style="list-style-type: none"> Other measures outlined in the Soil and Water Management Procedure (SWP) 		
		Exposure to unidentified contaminated materials during works, causing program delays and injuries and health concerns	10 (moderate)	Direct: <ul style="list-style-type: none"> Induct construction personnel in the identification and management of previously unidentified contaminated sites. The discovery of previously unidentified contaminated material will be managed in accordance with an unexpected contaminated lands finds procedure. The procedure will include: <ul style="list-style-type: none"> Cease work in the vicinity Initial assessment by an appropriately qualified environmental consultant Further assessment and management of contamination, if confirmed, in accordance with Section 105 of the CLM Act Indirect: <ul style="list-style-type: none"> Other measures outlined in the Unexpected Contaminated Land Finds Procedure 	8 (minor)	Unexpected Contaminated Land Finds Procedure (within SWP)

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
Heritage	<ul style="list-style-type: none"> Utility works and relocation 	Disturbance or damage of unidentified Aboriginal heritage artefact	4 (minor)	<p>Direct:</p> <ul style="list-style-type: none"> All on site personnel will be provided with site training in regard to Aboriginal cultural heritage site awareness, key mitigation and management requirements and their responsibilities pertaining to the Aboriginal Heritage provisions of the NPW Act 1974 (NSW) prior to construction commencing. Training will include unexpected heritage finds procedures for heritage items, objects and human remains. Implement Unexpected Heritage Finds and Human Remains Procedure <p>Indirect:</p> <ul style="list-style-type: none"> Other measures outlined in the Heritage Management Procedure (HP) 	3 (minor)	Heritage Management Procedure (HP) Unexpected Heritage Finds and Human Remains Procedure (within HP)
		Disturbance or damage of non-Aboriginal heritage items including: <ul style="list-style-type: none"> St Leonards Park Cammeray Park (including air raid trenches) 	9 (moderate)	<p>Direct:</p> <ul style="list-style-type: none"> Any excavations, intrusive works or other operations that have the potential to impact areas of known heritage, cultural or archaeological items must ensure works are performed in accordance with a heritage assessment and regulatory requirements (which may include a dilapidation survey and/or supervision of works by a competent person and/or vibration monitoring) Any such areas should be signposted and segregated by the erection of physical barriers to prevent authorised entry <p>Indirect:</p> <ul style="list-style-type: none"> Archival recording in accordance with CoA E56 and REMM NAH5 	6 (minor)	HP

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				<ul style="list-style-type: none"> Integrated design assessment by heritage specialists of potential air raid trench impacts Other measures outlined in the HP 		
Noise and Vibration	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Noise and vibration impacts on nearby receivers, including out of hours impacts resulting in structural damage or community complaints	15 (significant)	<p>Direct:</p> <ul style="list-style-type: none"> All on site personnel will undergo a site induction and ongoing toolbox talks that will detail noise and vibration requirements from this plan through inductions, toolboxes and targeted training Noise and vibration monitoring undertaken in accordance with the Project's Construction Noise and Vibration Monitoring Program The safe working distances for vibration intensive plant would be complied with where feasible and reasonable. This would include the consideration of smaller equipment when working in close proximity to existing structures Erection of temporary noise walls Community liaison and notification Provision of respite and alternative accommodation where required Programming the works to minimise the duration of noisy works in any one particular location <p>Indirect:</p> <ul style="list-style-type: none"> Other measures outlined in the NVMP and Construction Noise and Vibration Monitoring Program 	9 (moderate)	Noise and Vibration Management Plan (NVMP) Construction Noise and Vibration Monitoring Program

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
		Noise disturbance due to works undertaken out of standard construction hours	15 (significant)	<ul style="list-style-type: none"> Out of Hours Works are to be carried out in accordance with the Project's Out-of-Hours-Works Protocol and EPL Ensure OOHW are appropriately justified – safety or community requirement. Implement noise mitigation strategies for out of standard hours work as per OOHW Protocol. Monitor noise for compliance to project goals. Community notifications distributed. 	9 (moderate)	NVMP OOHW Protocol
Soil and Water	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Serious incidents, e.g. uncontrolled release of washout water, water treatment plant, major fuel spill, that cause or threaten material harm to the environment	12 (moderate)	<p>Direct:</p> <ul style="list-style-type: none"> Any washout areas will be adequately sized, regularly maintained, and located in designated covered areas. They will be outside of riparian areas and well away from stormwater system inlets in a position where wastewater will not enter any drainage lines or waterways The use of any hazardous substance that could result in a spill will be undertaken away from drainage or stormwater lines and, wherever possible, within defined bunds Any refuelling undertaken on site shall be undertaken in designated areas only, outside of riparian areas and well away from stormwater system inlets Spill containment kits will be placed at locations where there is direct discharge of stormwater to receiving waterways <p>Indirect:</p>	8 (minor)	SWP

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
		Erosion and sedimentation impacts on downstream waterways due to exposed land, inadequate controls or failure of controls	12 (moderate)	<ul style="list-style-type: none"> Other measures outlined in the SWP <p>Direct:</p> <ul style="list-style-type: none"> ESCPs will be prepared for all work and implemented in advance of site disturbance All on site personnel will undergo a site induction and ongoing toolbox talks that will detail erosion and sediment control management measures Further targeted training to key on site personnel EWMS will be prepared for high risk activities An experienced soil conservation specialist (CPESC) will be engaged to provide advice regarding erosion and sediment control Hardstand areas and surrounding public roads will be cleaned as required using methods such as brooms, bobcat attachments or street sweepers <p>Indirect:</p> <ul style="list-style-type: none"> Other measures outlined in the SWP 	6 (minor)	SWP ESCP
Traffic	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Traffic and parking impacts due to increased number of construction vehicles, site access arrangements and vehicle movements	12 (significant)	<p>Direct:</p> <ul style="list-style-type: none"> Designated haul routes for heavy vehicles Deployment of surveillance officers Utilisation of the traffic control centre Limiting vehicle movements to designated entries and exits and haulage routes All on site personnel will undergo a site induction and ongoing toolbox talks that will 	9 (moderate)	Traffic, Transport and Access Management Plan (TTAMP)

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				<p>detail traffic, transport and access management measures</p> <ul style="list-style-type: none"> • Communication and adherence to a Driver Code of Conduct • Minimise construction vehicle parking on public roads • Queuing and idling of construction vehicles in residential streets will be minimised and only where approved. • Measures identified in the TMP will be implemented for each ancillary facility/construction compound which requires direct access/egress onto the local/arterial road network <p>Indirect:</p> <ul style="list-style-type: none"> • Other measures outlined in the TMP 		
Utilities	<ul style="list-style-type: none"> • General construction activities • Utility works and relocation 	Damage to existing utility services	20 (significant)	<p>Direct:</p> <ul style="list-style-type: none"> • Ensuring appropriate precautionary measures are undertaken or in place prior to works such as completing Dial Before You Dig searches • Positive utility identification such as through potholing or non-destructive digging • Utilisation of utility spotters • Ensuring Ground Penetration Permits are obtained • Appointment of a Project Utility Coordination Manager • Liaison with the relevant utility agencies <p>Indirect:</p>	12 (moderate)	CEMP and Sub-plans

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				<ul style="list-style-type: none"> Other measures outlined in the Utilities Management Strategy (UMS) 		
Visual	<ul style="list-style-type: none"> General construction activities 	Visual impacts on nearby receivers due to light spill, construction works, overshadowing	10 (moderate)	<p>Direct:</p> <ul style="list-style-type: none"> Site establishment works will be conducted to minimise visual impacts. Where there is no noise wall or hoarding in place, boundary fencing will be installed to minimise visual, noise and air quality impacts on adjacent sensitive receivers Retention of existing vegetation or treatment of key temporary structures Minimise light spill from the project by directing construction lighting into the construction areas and ensuring the site is not over-lit <p>Indirect:</p> <ul style="list-style-type: none"> Other measures outlined in the Site Establishment Management Plan (SEMP) 	8 (minor)	CEMP and Sub-plans
Waste	<ul style="list-style-type: none"> General construction activities Utility works and relocation 	Inappropriate disposal of waste (including demolition, vegetation and hazardous / special waste) or disposal at an unlicensed waste facility	12 (moderate)	<p>Direct:</p> <ul style="list-style-type: none"> All on site personnel will undergo a site induction and ongoing toolbox talks that will detail waste and resource management measures Vegetation disposal in accordance with the FFMP and Weed Management Protocol HAZMAT surveys and removal of asbestos prior to demolition activities Waste classification in accordance with EPA guidelines Suitably licensed waste contractors will be used for the collection and transport of all non-domestic, retail and commercial wastes 	6 (minor)	Waste and Resource Use Management Procedure (WP) FFP SWP CWMP

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				<p>for either offsite processing and/or disposal to an appropriately licensed facility.</p> <ul style="list-style-type: none"> • Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes • Waste tracking register • Collection of forecast waste types, volumes, disposal locations and confirmation of approved disposal locations through the Construction Waste Management Plan (CWMP). <p>Indirect:</p> <ul style="list-style-type: none"> • Other measures outlined in the Waste and Resource Use Management Procedure (WP), SWP and FFP 		
		Litter, inappropriate use of co-mingling and waste receptacles	4 (minor)	<p>Direct:</p> <ul style="list-style-type: none"> • All staff and subcontractors will undergo a site induction and ongoing toolbox talks that will detail waste and resource management measures (including the waste management hierarchy) and energy consumption • All recyclable solid wastes (paper/ cardboard/ plastic/ glass/ timber/ metals/ fluorescent lighting/ printer cartridges/ICT equipment) will be segregated for recycling purposes and volumes reported. Wherever possible, packaging should be avoided or minimised to prevent waste products being unnecessarily brought onto an operation <p>Indirect:</p> <ul style="list-style-type: none"> • Other measures outlined in the Sustainability Management Plan and WMP 	2 (negligible)	WP

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3.2. Pre-emptive Control Measures

Pre-emptive actions will be undertaken on the Project in order to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises. Effective incident prevention involves utilising control measures on site through the following avenues:

- Ongoing testing, monitoring and training
- Thorough planning of construction activities
- Ongoing involvement of key personnel in that planning process
- Effective training of relevant personnel.

During the course of construction, strategies that will be implemented onsite may include:

- Annual PIRMP plan simulations / tests
- Daily inspections of active work sites
- Completion of Environmental Inspection Checklists
- Issue and quick close-out of non-compliance notices (as required)
- Prompt maintenance and repairs
- Ongoing environmental training
- Environmental audits of worksites, sub-contractors and general compliance
- Environmental and safety information on hazardous substances will be available at the main site office and where such substances are to be stored
- Provision and use of spill containment kits and other safety equipment listed in Section 3.2.3 of this Plan
- An up-to-date list of emergency response personnel and relevant authorities (emergency services, EPA, etc) will be maintained at the main office and site compounds.

3.2.1 PIRMP Testing

Testing of the PIRMP will be conducted at least once every 12 months in accordance with the POEO (G) Regulation. Testing may include desktop simulations and/or practical exercises.

Furthermore, in accordance with the POEO (G) Regulation, the PIRMP will also be tested within one month of any pollution incident occurring in the course of an activity to which the Project's EPL licence relates in order to assess that the information included in the plan is accurate and up to date, and the plan is capable of being implemented in an effective manner.

Following testing, the PIRMP will be updated to include:

- Dates when the PIRMP was tested and the name of the person(s) who carried out the test
- Dates when the PIRMP was updated
- Any changes or amendments made to the PIRMP following the test being undertaken.
- A description of how, when and by whom the PIRMP is to be tested and maintained over the next testing period.

3.2.2 EWMS

The Project CEMP requires that Environmental Work Method Statements (EWMS) will be prepared where residual risk is assessed as high, or if required under the TfNSW QA Specifications. All EWMS statements will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. They will specify actions to be

undertaken to ensure compliance with the EPL, and CEMP and will draw on the mitigation measures detailed in the specific Sub-plans.

3.2.3 Safety Equipment

Spill kits are located in compound areas, site vehicles and on the Project at the location of high risk activities. Spill kits will be monitored as part of weekly inspections and will be replenished as required. These kits are designed for immediate containment and management of pollution incidents and, as a minimum, are stocked with the following material:

- Absorbent mats
- Absorbent floor sweep material
- Disposal bags.

A summary of the safety equipment to be kept at construction ancillary facilities is presented in Table 3-4.

Table 3-4 Safety equipment and sites to be stored

Safety equipment	Description	Sites and indicative locations
Firefighting equipment		
Fire extinguishers	To be used in combating fires	All ancillary facility sites.
Fire Hydrants	Existing Hydrant Points on the Sydney Water Main (any new hydrants will be installed and operational following commencement of Mechanical and Electrical Construction Activities)	
Hose reels	To be used in combating minor fires	
Fire mains	Water supply points to be used for fire fighting	
Bund equipment		
Plant wash-down areas	Dedicated plant wash-down areas to prevent the spread of pollutants from heavy vehicles and plant	<ul style="list-style-type: none"> • Ridge Street North.
Refuelling and plant parking areas	Dedicated hardstand area for refuelling and parking plant	
Chemical storage areas	Bunded storage areas that serve to store chemicals and hazardous substances	
Pollution incident control equipment		

Safety equipment	Description	Sites and indicative locations
Spill kit	To be used to locally contain and control chemical spills	<ul style="list-style-type: none"> Each ancillary facility will contain a spill kit or multiple spill kits where required Different types of spill kits should be available for different pollutants Type and size of spill kit should depend on the risk associated with the works and impact from potential spills Spill kits should be located in areas where handling and use of dangerous goods occurs, and where they can be easily seen and identified.
Two-way radios	Surface / civil works internal communication tool	All ancillary facility sites.
Sucker Trucks	Surface / civil works to contain spills / liquid wastes	All ancillary facility sites. <ul style="list-style-type: none">
Street Sweepers	To mitigate dust and sediment pollution	All ancillary facility sites. <ul style="list-style-type: none">
Spill Booms	To contain spills	All ancillary facility sites.
Pumps	Liquid waste handling and movement	All ancillary facility sites.
Personal protective equipment (PPE)		
Chemically resistant gloves	PPE serves to protect the skin, eyes and other parts of the human body, while attending to pollution incidents	All ancillary facility sites. <ul style="list-style-type: none">
Protective safety eyewear		
Covered footwear		
Protective clothing		
Face mask if required		
Disposable suit if required		
Other		
Mobile Phones	These will permit communications with outside emergency services	All ancillary facility sites.

3.3. Training

All personnel to work onsite will undergo a site induction and environmental training in order to improve awareness of environmental management and ensure that the pollution incident procedure is understood. Further details of the environmental training provided can be found in Section 3.5 of CEMP, but generally the training will cover the following:

- This Plan
- Individual responsibilities
- Notification requirements
- Pollution incident response personnel

- Spill minimization measure and spill response.

Personnel who will have a key role in ensuring the pollution incident procedure is implemented or involved in emergency response activities will be provided with specific training. This could be in the form of a toolbox talk or presentation, and records of all personnel who have undertaken training will be retained by the Project.

4. Implementation

4.1. Minimising the risk of harm to any persons

The PIRMP will be activated if an incident causes or threatens material environmental harm (as described in Section 147 of the POEO Act). This activation process will include the involvement of the SPA Environment Manager and Project Manager and will involve undertaking measures to mitigate the risk and ensure that the area is safe.

In the event of an environmental incident, SPA Environmental Incident / Emergency Response Protocol will be followed in the first instance, involving consultation and communication, identification and assessment, implementation of controls and revision and management of the incident. The protocol is provided in Appendix C.

4.2. Responsibilities

All personnel who complete work on the project have an obligation to fulfil their responsibilities in regard to pollution incidents. When responding to a pollution incident there will be key personnel who are responsible for the implementation of this Plan and the provision of appropriate resources to adequately implement the PIRMP. The key personnel and associated responsibilities in the implementation of the PIRMP are listed below.

4.2.1 Project Manager

- Responsible for enacting the PIRMP as required
- Be an emergency contact and available to be contacted by the EPA and TfNSW Representative on a 24-hour basis
- Ensure appropriate resources are available to implement the PIRMP.

4.2.2 Environment Manager

- Responsible for enacting the PIRMP in consultation with the Project Director as required
- Be an emergency contact and available to be contacted by EPA and TfNSW Representative and main works sub-contractor (CPBD) on a 24-hour basis
- Reporting of environmental incidents to the appropriate regulatory authorities in accordance with CEMP
- In the event of an environmental incident, such as a spill, investigations of the mitigation measures and determine the potential for improved mitigation measures
- Ensure all site personnel are inducted and have an understanding of the pollution incident response and their roles and responsibilities
- Coordinate and implement incident training
- Follow the correct reporting requirements
- Conduct investigations into the cause of the incident
- Ensure the plan is tested every 12 months
- Ensure revisions of the Plan are up to date, as required.

4.2.3 Safety Manager

- Responsible for the overall onsite implementation/coordination of management strategies detailed within this PIRMP
- Contact emergency services, such as NSW Fire & Rescue, HAZMAT and/or Police for immediate response actions
- Maintain communications with emergency services

- Coordinate the safety aspects of incident response e.g. ensuring the safety of others following the incident.

4.2.4 Community Manager

- Responsible for preparation and implementation of procedures for communication with the community with regards to any incidents that may affect owners and occupiers of surrounding residents
- Ensure community engagement protocols are in place and maintained to keep stakeholders informed of relevant matter including main works subcontractor (CPBD)
- Assist the Environment and Sustainability Manager in the implementation and/or testing of the plan
- Maintain contact lists for community notifications as required
- Coordinate the communications aspects of incident response e.g. ensuring affected community members are regularly updated and informed about any pollution incident.

4.2.5 Superintendent

- Ensure all workers understand incident procedure and their roles
- Ensure all incidents are reported in a timely manner
- Assist Environment and Sustainability Manager investigate incident
- Provision of labour, equipment and support to the Environment and Sustainability Manager
- Coordinate general site operation aspects of incident response.

4.2.6 Environment Coordinator

- Provide advice to construction personnel regarding implementation and awareness of the PIRMP, CEMP and Sub-Plans
- Ensure environmental incidents are reported in accordance with plans and procedures
- Ensure environmental controls and mitigation measures are implemented and maintained
- Assist with development of environmental controls for specific areas and activities.

4.2.7 All site personnel

- Includes all subcontractors, workers, engineers, etc
- Attend pollution incident response training through compulsory site induction
- Participate in toolboxes which go through the incident response procedure
- If an incident occurs onsite, flow the procedure correctly
- Always report incidents as soon as possible
- Assist with any subsequent investigation as required.

4.2.8 Key Individual Contact Details

Individuals responsible for enacting the PIRMP, notifying appropriate regulatory authorities, and managing the response to a pollution incident are listed in the Table at the beginning of the document "Contact Details if section 147 of the POEO Act is triggered". When a pollution incident causes or

threatens material harm to the environment or human health, it is the responsibility of the SPA Environment Manager in conjunction with the Project Manager, if required, to contact the EPA and ARA listed in this Table.

5. Incident Response Procedure

The PIRMP will be activated if a pollution incident occurs that causes or threatens material environmental harm. This activation process will include the SPA Environment Manager and the Project Manager. The actions immediately following an incident will depend on the pollution incident type and severity. All contaminated material would be disposed of through specialist waste contractors. The following steps will be followed in line with TfNSW Environmental Incident Classification and Reporting procedure.

5.1. Immediate response

Personnel in the vicinity must stop works and immediately contact their supervisor, superintendent and foreman who will then notify the SPA Environment Manager.

If safe to do so, personnel should apply immediate controls to contain the pollutant and/or minimise further harm to the environment for example through the use of a spill kit, instalment of bunding and/or deploying a boom if the incident is related to a watercourse or water body. The measures undertaken to contain and clean up the pollutant will depend on the exact scenario, but will be undertaken under the instruction of the SPA Environment Manager (or delegate) and the Superintendent (or delegate).

Emergency services (e.g. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service) will be contacted via the “000” number if the incident presents an immediate threat to human health or property.

5.2. Classifying incident

The SPA Environment Manager will assess the pollution incident to determine if it has or is threatening to cause material environmental harm in accordance with Section 147 of the POEO Act.

5.3. Notifying a pollution incident that causes or threatens material environmental harm to regulatory authorities and the community

In the event of an incident, appropriate regulatory authorities must be immediately notified with the required information; emergency services, mainworks subcontractor (CPBD) and community stakeholders may also require notification in the event that there is an unacceptable impact to the community from the pollution incident.

5.3.1 Relevant Regulatory Authorities

If the SPA Environment Manager determines the pollution incident meets the notifiable criteria that the pollution incident “causes or threatens to cause material harm to the environment”, the SPA Environment Manager in consultation with the Project Manager will immediately notify the appropriate regulatory authorities listed below.

- The appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) – the local authority is a local council of an area under the Local Government Act 1993)
- The EPA, if it is not the ARA
- The Ministry of Health via the local Public Health Unit (Camperdown Public Health Unit)
- SafeWork NSW
- Local Authority (i.e. North Sydney Council) if it is not the ARA

- Fire and Rescue NSW (if the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.)

As required by POEO (G) Regulation clause 101, a pollution incident that is required to be notified under section 148 of the POEO Act will be notified verbally to each regulatory authority, and followed by written notification within 7 days of the date on which the incident occurred. If information becomes known between the immediate notification given verbally and the time when written notification is required to be given, that new information will be required to be notified immediately after it becomes known and to be included in the written notification.

As required in section 148 of the POEO Act, the Condition of Approval A41 and the Roads and Maritime Environmental Incident Classification and Reporting Procedure, the following information will need to be collected to communicate during immediate EPA, ARA and authority notification as well as for inclusion in follow up reporting required in the event of a pollution incident:

- a) the time, date, nature, duration and location of the incident
- b) the location of the place where pollution is occurring or is likely to occur
- c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- d) the circumstances in which the incident occurred (including the cause of the incident, if known)
- e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- f) other information prescribed by the regulations.

A record of information provided during notification of pollution incidents in accordance with this Plan will be recorded on the external communication summary worksheet.

If the information required to be included in a notice of a pollution incident from points (c), (d) or (e) is not known to the person making the initial notification but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.

5.3.2 Community Stakeholders

Definition of Community Stakeholders

As identified in the CCS, community stakeholders relevant to the area surrounding the Project include:

- Adjacent and nearby residents and occupiers of commercial premises
- All road users, motorists and pedestrians (for instances where the incident results in a hazard to motorists)
- Occupiers of special use buildings such as hospitals, shopping centres, day care centres and schools
- Users of recreational and special use facilities such as ovals, parks, waterways, and entertainment facilities
- Users of waterways for recreational purposes or commercial purposes.

Key community stakeholders in close proximity to the project which may be notified in the event of a pollution incident that threatens or cause environmental harm include:

- Government Agencies
- North Sydney Council
- Local Community (impacted residents and landowners)
- Adjacent and surrounding businesses
- Recreational Clubs
- Schools and day care centres

- Health Facilities
- Emergency Services
- Indigenous Groups
- The Project team and parent organisations
- Adjacent infrastructure projects.

Stakeholder groups divided on a site-specific basis that may be notified in the event of a pollution incident associated with the Project are listed in Table 2-1 and Appendix B of this Plan, as well as listed in Table 4-1 and Table 5-1 of the CCS.

Community Stakeholder Notification Triggers

Community stakeholder notification is required for incidents or events from the Project which:

- Will result in an unacceptable impact to community stakeholders during the incident (where community stakeholders are present (e.g. residing in their houses or using adjacent recreational facilities at the time of the incident))
- Will result in an unacceptable impact to a community area that is to be used by community members in the days and weeks following the incident. These community stakeholders may not be present during the incident but might be present in the following days.

The SPA Environment Manager in consultation with the Community Manager will determine whether the pollution incident triggers the stakeholder notification process. The SPA Community Manager will initiate and coordinate the notification process.

The determination of community notification is dependent upon the type, intensity and potential of impact to the community. An unacceptable impact is defined as one which has the potential to adversely affect the health of a member of the community. This takes into consideration immediate health impacts (that occur during the incident) and health risks in the period following the incident.

Community Stakeholder Notification Process

Should community notification be required, the following actions shall be taken where appropriate and safe to do so:

- Community stakeholders will be contacted either face to face or by telephone to advise the stakeholder of the incident with recommended actions (that the community stakeholder can take to prevent or minimise harm, for example close windows, evacuate buildings, not to drink or swim in watercourses etc).
- Further follow up communications will be undertaken as directed by the SPA Community Manager. This may include but not be limited to:
 - Further face to face / telephone contact
 - Letterbox drops
 - Email
 - Update to Project website
 - Providing protective fencing and barricading to prevent community stakeholders from entering into a polluted area
 - Use of technology such as Variable Message / Motorway signage
 - Local Media – Radio / TV if required.

The Project team will use a combination of the above mechanisms to ensure that relevant community messages are quickly and effectively distributed amongst the affected community. Early warnings for affected or potentially affected community members for any pollution incident will be communicated to those members in consultation with relevant authorities. The means of communication will vary based on the size and severity of the pollution incident. SPA will provide regular updates of any pollution incidents either via letterbox drop, notices in local papers and/or via door knocks, use of variable message signs, and local radio as required in consultation with relevant authorities.

It is likely that during the notification process, the incident will likely be under the control of emergency services personnel. In such an event the SPA Environment Manager and Community Manager will provide all the necessary assistance to the incident controller including access to the Project's community notification tools and community & stakeholder register as outlined in the CCS.

For air pollution incidents that may affect community members, those community members may be asked to either close their doors and windows and stay indoors until further notice or to vacate the premises. For water pollution incidents that may affect community members, those community members may be asked to avoid use of the water until further notice. To assist in the areas that would be affected by a pollution incident sensitive receives such as schools, local government and national parks have been identified in sub-catchment areas, see Appendix B.

5.4. Clean up the incident

The Superintendent or delegate is to ensure all components of the incident have been addressed and cleaned up under direction of the SPA Environment Manager.

5.5. Reporting

The SPA Project Manager and the Environment Manager will report the incident to internal stakeholders and relevant external stakeholders such TfNSW in accordance with Section 3.7 and 3.8 of the CEMP using systems dictated in those procedures such as the TfNSW Incident Report Form and a report of the incident is to be submitted into SOTERIA with a copy of the TfNSW incident form attached.

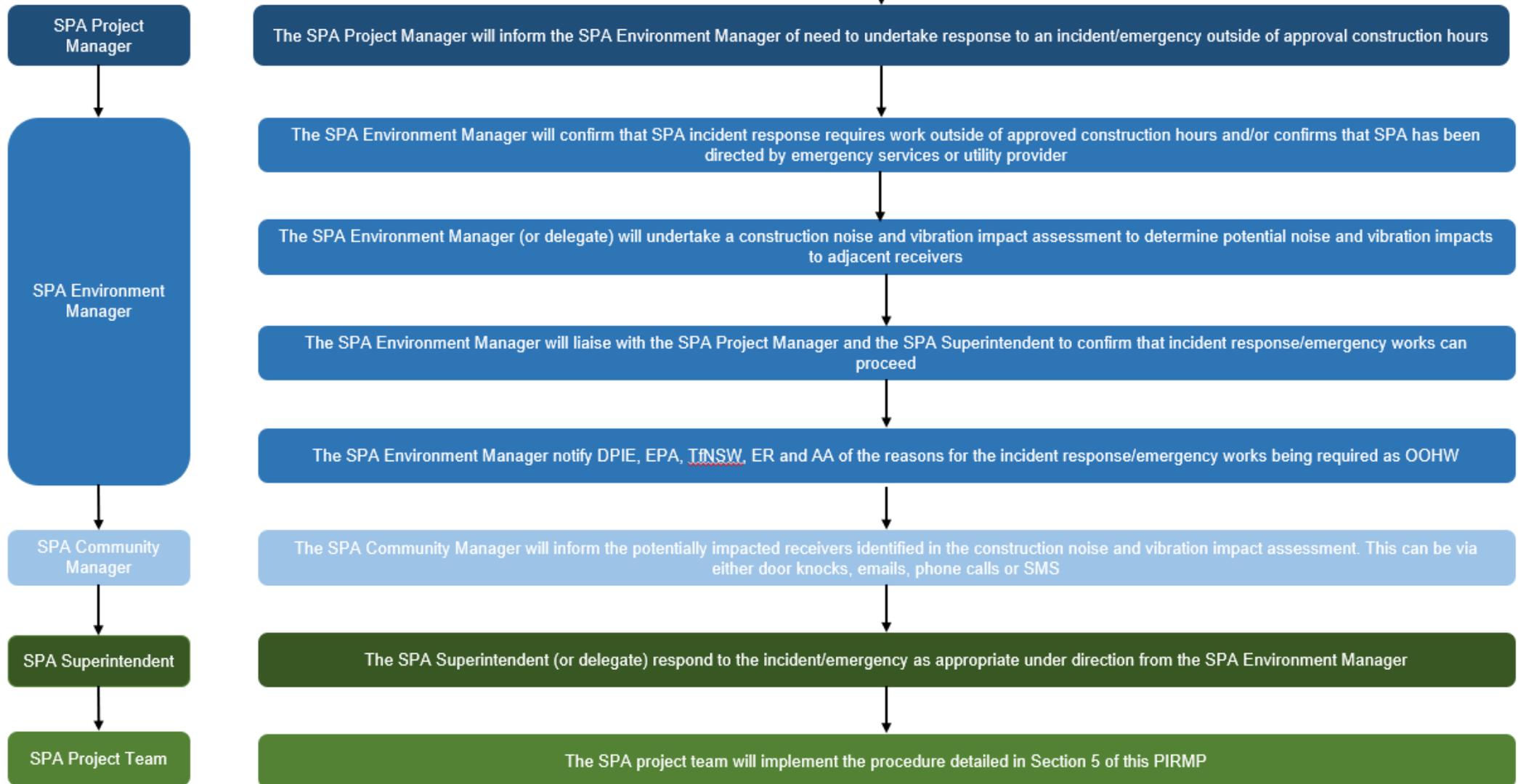
5.6. Investigation

The SPA Environment Manager shall undertake an incident investigation as required by SPA internal requirements. Following completion of the investigation, any corrective and preventative actions identified as a result of incident investigation will be implemented.

6. Procedure to follow when incident response requires work outside of approval construction hours

There may be instances when responding to an incident requires work to be undertaken outside of the approved construction hours detailed in the CoA (SSI-8863) or in the Project EPL (#21528). There may also be circumstances where SPA are directed by emergency services or utility providers to respond to an emergency, in accordance with CoA E68(a)(ii). In these instances the following procedure will be followed.

Project requires response to incident/emergency outside of approved construction hours



7. Plan availability

A copy of the plan will be maintained at each premise located within the boundaries of the Project EPL, to ensure that it is readily available to staff and those responsible for the implementation and coordination of the plan. The plan will be available at request of any authorised EPA officer.

Relevant information from this plan will be made available to the public through the Project website <https://caportal.com.au/rms/wht> in accordance with clause 98D of the POEO (G) Regulation. This includes the following:

- Procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW
- Procedures for communicating with the community
- May be exclusive of any personal information within the meaning of the Privacy and Personal Information Protection Act 1998.

8. Review and improvement of the PIRMP

7.1. Continual improvement

Continual improvement of this Plan will be achieved through an annual evaluation of the implementation of the PIRMP, evaluation of environmental incidents and the testing of this Plan.

The continual improvement process will be designed to:

- Identify areas of opportunity for improvement of pollution incident which leads to improved environmental performance
- Determine the root cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address non-conformances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparison with objectives and targets.

Testing of this Plan is required to be undertaken, as a minimum, once every 12 months. Testing is to be carried out in such a manner as to ensure that the information in this plan is relevant, up to date, and that the Plan is capable of being implemented in a workable and effective manner.

The Plan will be similarly reviewed within one calendar month of having been implemented, in accordance with the POEO Act.

An up-to-date list of emergency response personnel and organisations will be maintained at the main office and compounds.

7.2. Plan update

Between scheduled audits and reviews, a register of issues will be maintained to ensure that any issues are recorded for future action.

Changes to this Plan will be approved by the SPA Environment Manager.

Appendix A – PIRMP Guideline Checklist

All licensees except for waste transporters need to include the following information as a minimum. In the following discussion, use of the term 'section' refers to provisions in the POEO Act and 'clause' to provisions of the POEO(G) Regulation.

Table A-1 PIRMP Guidelines Checklist

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
1.1 Introduction	N/A	<p>The objectives of these plans are to:</p> <ul style="list-style-type: none"> • minimise the risk of a pollution incident occurring as a result of their licensed activities, as they would have identified risks and the actions they propose to take to minimise and manage those risks • have established clear and effective notification, action and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately, including <ul style="list-style-type: none"> ○ people who may need to be involved in incident responses – including staff at the premises; the Environment Protection Authority (EPA); and other relevant authorities (such as Fire and Rescue NSW, NSW Health and local councils) ○ industrial, commercial and residential neighbours and other members of the community • have properly trained staff and up-to-date incident management information available to ensure the potential impact of a pollution incident is minimised. 	Section 1.2 Objectives states objectives for the Project PIRMP in line with those required by the guidelines.
1.3 Legislative requirements	Part 5.7A of the POEO Act and the POEO(G) Regulation	The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:	This PIRMP has been prepared in accordance with all relevant legislative requirements of the POEO Act and the POEO(G) Regulation. These provisions have been acknowledged in Section 1.1, 1.2, 1.3 as well as Section 3 of this Plan.
	Section 153A	– Holders of an EPL must prepare a PIRMP	This Plan

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
	Section 153C Clause 98B	<ul style="list-style-type: none"> - The Plan must include the information detailed in the POEO Act (Section 153C) and be in the form required by the POEO (G) Regulation (clause 98B) 	<p>In accordance with Section 153C (a), (b) and (c) this Plan provides the relevant procedures and detailed descriptions in regards to notification and action to be taken after a pollution incident in section 5.3. Other matters required by the regulations are covered in this Plan and detailed in this table.</p> <p>In accordance with clause 98B this Plan is in written form.</p>
	Section 153D	<ul style="list-style-type: none"> - Licensees must keep the Plan at the premises to which the EPL related or in the case of trackable waste transporters and mobile plant, where the relevant activity takes place 	Details regarding the availability and location of the Plan are provided in Section 7 of this Plan.
	Clause 98E	<ul style="list-style-type: none"> - Licensees must test the Plan annually in accordance with the POEO (G) Regulation 	Details regarding the annual testing of the Plan are addressed in Section 3.2.1.
	Section 153F	<ul style="list-style-type: none"> - If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan 	If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, SPA will immediately implement this Plan, as acknowledged in sections 1.1,4 and 5.
1.5 Definition of 'pollution incident'	N/A	<p>The definition of a pollution incident is: <i>pollution incident means 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</i></p>	The definition of a pollution incident provided by the PIRMP guidelines has been used in the PIRMP and is

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
		<p><i>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.</i></p> <p>A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:</p> <ul style="list-style-type: none"> - (a) harm to the environment is material if: <ul style="list-style-type: none"> o (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or o (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and - (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. 	<p>acknowledged in Section 1.3 of this Plan.</p> <p>The definition of a notifiable pollution incident as defined in Section 147 of the POEO Act has been used in the PIRMP and is acknowledged in Section 1.4 of this Plan.</p>
2.1 Form of plans	Clause 98B(1) and 98D(1)	<p>The PIRMP must be:</p> <ul style="list-style-type: none"> • in written form • available at the premises so it can be provided to an authorised EPA officer on request. <p>The PIRMP may form part of another document required under different legislation, as long as the information required for the PIRMP is readily identifiable in that other document.</p> <p>The PIRMP must include:</p> <ul style="list-style-type: none"> • the procedures to be followed by the licensee to notify people on the premises, people within the vicinity of the premises, the local authority for the area and all other relevant authorities as required under the legislation in the event of a pollution incident • detailed descriptions of the actions to be taken by the licensee immediately after the pollution incident to reduce or control any pollution 	<p>This Plan has been prepared in written form and will be made available at the premises to which the EPL relates and will be able to be provided to an authorised EPA officer on request. This is detailed in Section 7. Section 5 details the procedures to be following following a pollution incident.</p>

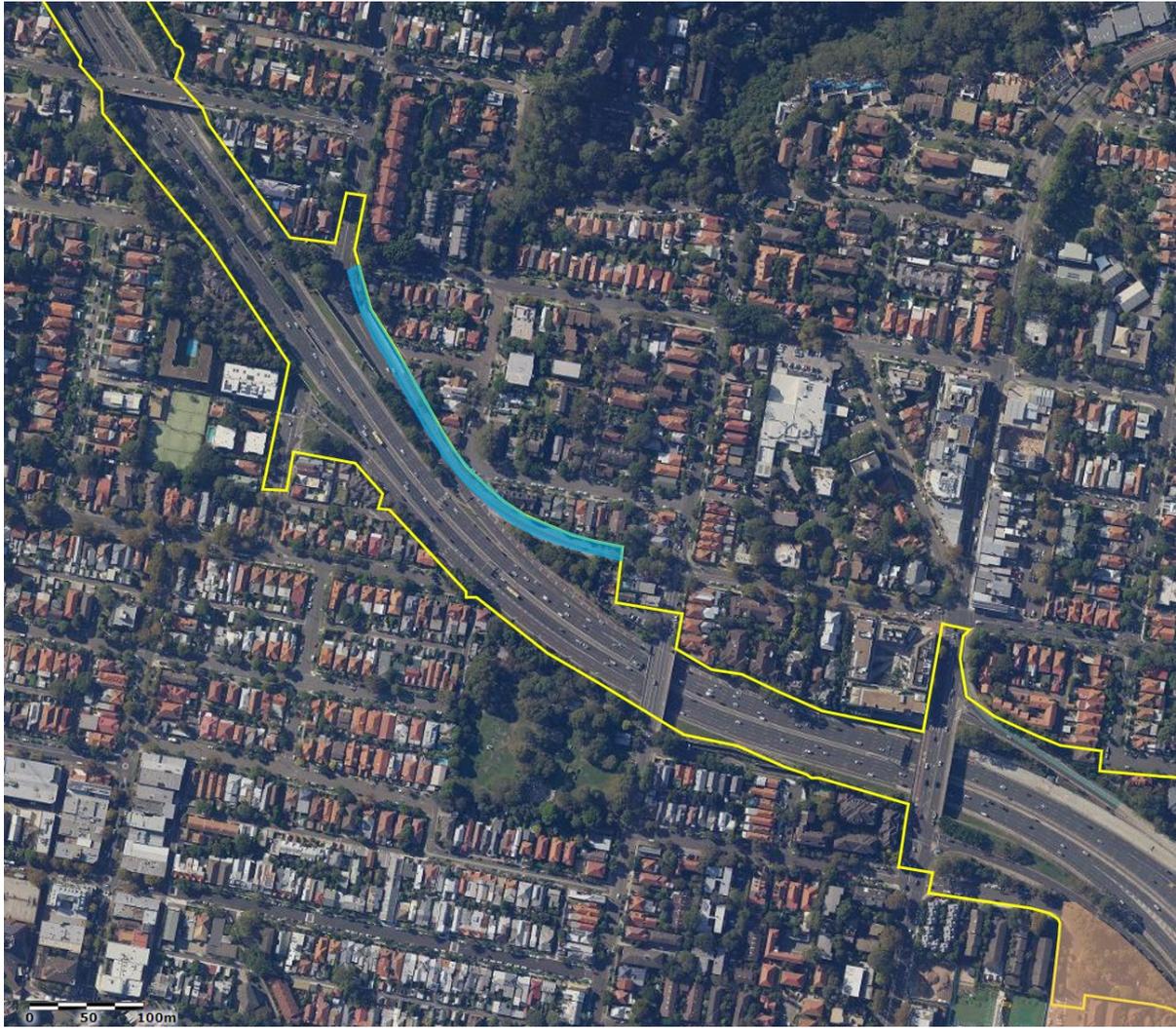
Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
		<ul style="list-style-type: none"> the procedures to be followed to coordinate, along with authorities and other notified persons, the actions to be taken to address the pollution caused by the incident the persons who will be responsible for all communications in the event of a pollution incident. 	
2.2.1 Implementing the PIRMP	Section 153F	If a pollution incident occurs at the premises so material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement any PIRMP that was developed to meet the requirements of the POEO Act.	Details on the implementation of this Plan have been included in Section 4 of this Plan.
2.2.2 Making the PIRMP publicly available	Section 153D	<p>A copy of the full PIRMP must be maintained at the premises to which the licence relates, or where the relevant activity takes place, so it is readily available to the person/s responsible for implementing the PIRMP and to an authorised officer on request.</p> <p>Parts of the PIRMP must be made publicly available within 14 days after it has been prepared by:</p> <ul style="list-style-type: none"> placing the PIRMP in a prominent position on a publicly accessible website of the licensee or if the licensee does not have such a website, by providing a copy of the PIRMP, without charge, to any person who makes a written request for one. 	Section 7 of this Plan addressed the requirement for this Plan to be made publicly available.
2.2.3 Testing plans	Clause 98E(2)(a), 98E(2)(b), 98C(1)(n), 98C(1)(o), 98C(1)(p), 98C(2)(f) and 98C(2)(g)	<p>PIRMPs must be tested at least once every 12 months. They must also be tested within one month of any pollution incident occurring.</p> <p>PIRMPs for all licensees must include details of:</p> <ul style="list-style-type: none"> how the PIRMP is to be tested and maintained the dates on which the PIRMP has been tested and the names of the staff members who carried out the testing. <p>For premises-based and mobile plant licence holders, the PIRMP must also include the dates on which the PIRMP is updated.</p>	The PIRMP will be tested in accordance with section 3.2.1 of this Plan.

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
2.3.1 Description and likelihood of hazards	Clause 98C(1)(a) and (b)	<p>The PIRMP must provide:</p> <ul style="list-style-type: none"> a description of the hazards to human health and/or the environment associated with the activity being undertaken at the premises or where the activity takes place the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood. 	A description and likelihood of hazards associated with the Project is provided in Section 3.1 of this Plan.
2.3.2 Pre-emptive actions to be taken	Clause 98C(1)(c)	The PIRMP must include detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises.	Descriptions of the pre-emptive actions that will be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises are detailed in Section 3.2 of this Plan.
2.3.3 Inventory of pollutants	Clause 98C(1)(d) and (e)	<p>The PIRMP must include:</p> <ul style="list-style-type: none"> an inventory of potential pollutants stored on the premises or used in carrying out activities at the premises the maximum quantity of any potential pollutant likely to be stored or held at the premises, including those stored in underground tanks. 	<p>An Inventory of Pollutants has been provided in Appendix D of this Plan.</p> <p>Any relevant storage locations are demonstrated in Appendix B of this Plan.</p>
2.3.4 Safety equipment	Clause 98C(1)(f)	The PIRMP must include a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident.	A list of site-and-activity-specific Safety Equipment for the Project has been described in Section 3.2.3 of this Plan.
2.3.5 Contact details	Clause 98C(1)(g) and (h)	<p>The PIRMP must include the:</p> <ul style="list-style-type: none"> names, position titles and 24-hour contact details of those key individuals who are <ul style="list-style-type: none"> a) responsible for activating the PIRMP b) authorised to notify relevant authorities, including all five relevant authorities under section 148 of the POEO Act 	SPA staff responsible for activation of the Plan and liaison with relevant authorities are detailed in the Contact Details Section at the beginning of the Plan.

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
		<ul style="list-style-type: none"> c) responsible for managing the response to a pollution incident • relevant authorities under section 148 of the POEO Act, including <ul style="list-style-type: none"> d) the EPA e) Fire and Rescue NSW and/or Rural Fire Service f) NSW Health g) SafeWork NSW h) the local council. 	
2.3.6 Communicating with neighbours and the local community	Clause 98C(1)(i)]	The PIRMP must include details of the approaches and systems to be used to provide early warnings and regular updates to the owners and occupiers of premises near the licensee's premises (i.e. neighbours) who may potentially be impacted by an incident occurring on the premises.	<p>Details regarding the communication with neighbours and the local community are detailed in section 5.3 and 5.3.2.</p> <p>Further details regarding community communication protocols are provided in the CCS.</p>
2.3.7 Minimising harm to persons on the premises	Clause 98C(1)(j)	The PIRMP must include any actions or arrangements that will be in place to minimise the risk of harm to any people who will be on the premises or who are likely to be on the premises should an incident occur.	Strategies to minimise the risk of harm to those on premises where a pollution incident may occur are detailed in section 4.1 as well as in the pre-emptive control measures and risk assessment provided in section 3.1, and 3.2.
2.3.8 Maps	Clause 98C(1)(k)	<p>The PIRMP must include a detailed map (or set of maps) showing the:</p> <ul style="list-style-type: none"> • location of the premises • surrounding area likely to be affected by a pollution incident • location of potential pollutants on the premises (including underground tanks) • location of any stormwater drains on the premises. 	Maps have been prepared in accordance with the requirements outlined in the PIRMP guidelines. Maps are located in Appendix B and referenced in section 2 of this Plan.
2.3.9 Actions to be taken during	Clause 98C(1)(l)	The PIRMP must include:	The actions that will be taken during or immediately after a

Section of PIRMP Guideline	POEO reference	Requirements	How Addressed
or immediately after a pollution incident		<ul style="list-style-type: none"> a detailed description of how any identified risk of harm to human health will be reduced including, as a minimum, early warnings, updates and actions to be taken, during or immediately after a pollution incident to reduce that risk the procedures to be followed for coordinating with authorities or other persons who have been notified, any action to be taken in combating the pollution caused by the incident, including the person through whom all communications are to be made 	pollution incident are detailed primarily within section 5.
2.3.10 Staff training	Clause 98C(1)(m)	The PIRMP must include details on the nature and objectives of any staff training program in relation to the implementation of the PIRMP.	Details regarding staff training of the PIRMP and its requirements are detailed in section 3.3 of this Plan.
2.3.11 Testing and updating the PIRMP	Clause 98C(1)(n), 98C(1)(o) and 98C(1)(p)	<p>The PIRMP must include:</p> <ul style="list-style-type: none"> dates when the PIRMP was tested and the name of the person(s) who carried out the test dates when the PIRMP was updated a description of how, when and by whom the PIRMP is to be tested and maintained over the next testing period. 	The PIRMP will be tested in accordance with section 3.2.1 of this Plan.
6 Implementing plans	N/A	If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying out the activity must immediately implement any pollution incident management response that was developed to meet the requirements of the POEO Act.	This Plan will be immediately implemented in the case of a notifiable pollution incident as acknowledged in section 4 and 5.

Appendix B – Project Maps



Sheet 1 of 4

LEGEND



Project Boundary

EPL Boundary, including:



Utility work area



Construction work area



Active Transport Link (ATL)



Sheet 2 of 4

LEGEND



Project Boundary

EPL Boundary, including:



Utility work area



Construction work area



Active Transport Link (ATL)



Sheet 3 of 4

LEGEND

-  Project Boundary
- EPL Boundary, including:
 -  Utility work area
 -  Construction work area
-  Active Transport Link (ATL)



Sheet 4 of 4

LEGEND



Project Boundary

EPL Boundary, including:



Utility work area



Construction work area



Active Transport Link (ATL)

Appendix C – TfNSW Environmental Incident Classification and Reporting Procedure

Appendix D – Inventory of Polluting Substances

Chapter 23 (Hazard and Risk) of the Western Harbour Tunnel and Warringah Freeway Upgrade Environmental Impact Statement (EIS) outlines the types and estimated quantities of dangerous goods and hazardous substances that would be transported, stored and used within the construction ancillary facilities, and used for construction activities elsewhere in the Project footprint. The information in Table D-1 has been summarised from Chapter 23 of the EIS. For specific details on the product, chemicals and associated SDS's please refer to the Hazardous substances register "SPA RWK SDS Register 020622" located in the sharepoint folder.

At each construction ancillary facility:

- Liquid dangerous goods and hazardous chemicals would be stored within a bunded storage container or spill tray
- Gases would be secured and stored in a storage cage in a well-ventilated area
- Storage areas would be located away from natural or built drainage lines, to minimise the likelihood of pollutants entering adjacent watercourses in the event of a spill or leak escaping the bunded area
- Self-bunded fuel storage areas would be located within or adjacent to acoustic sheds.

Table D-1 Indicative dangerous goods and hazardous substances transported and used on site during construction

Material	Australian Dangerous Goods Code class	Storage method	Construction ancillary facility
Diesel	C1 ¹ , 3 PG III ²	Self-bunded fuel tank (up to 2.5 kilolitres) and 20 litre jerrycans	Ridge Street North Cammeray Golf Course
Petrol	C1 ¹ , 3 PG III ²	Self-bunded fuel tank (up to 2.5 kilolitres) and 20 litre jerrycans	All ancillary facilities
Lubricating and hydraulic oils and grease	C2	20 litre drums	Ridge Street North Cammeray Golf Course
Accelerator for shotcrete	3.2	1000 litre intermediate bulk containers (IBC)	Ridge Street North Cammeray Golf Course
Retardants for concrete	3 PGIII	205 litre drums	Ridge Street North Cammeray Golf Course
Epoxies	3 PGIII	20 litre drums	Ridge Street North Cammeray Golf Course
Acids	8 PGIII	1000 IBC (and smaller containers)	Ridge Street North Cammeray Golf Course
Bases	8 PGIII	1000 IBC	Ridge Street North Cammeray Golf Course
Disinfectants	8 PGIII	500 litre IBC	Ridge Street North Cammeray Golf Course
General purpose Portland cement	N/A	20 kilogram bags	All ancillary facilities
Road and joint sealants	N/A	12 litre boxes	All ancillary facilities
Concrete curing compounds	N/A	1000 litre IBC	Ridge Street North Cammeray Golf Course

Pavement layers curing compound	N/A	1000 litre IBC	Ridge Street North Cammeray Golf Course
Paints	N/A	50 litre drums	All ancillary facilities
Coagulants	N/A	1000 litre IBC	Ridge Street North Cammeray Golf Course
Anti-scalent	N/A	100 litre drums	Ridge Street North Cammeray Golf Course