

Appendix 12: Pollution Incident Response Management Plan (PIRMP)

This Pollution Incident Response Management Plan has been prepared to meet the requirements of the Environment Protection Licence (EPL 21147).

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority, Sydney Metro and other relevant authorities specified in the POEO Act (such as local councils, NSW Ministry for Health, WorkCover NSW, and Fire and Rescue NSW), and people outside the project who might be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident associated with the construction of the project by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

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 issued.

External Notification Protocol

The following authorities must be contacted in the order below:

Order	Authority	Name	Phone Number
1	Emergency Services	Fire and Rescue NSW Police NSW Ambulance Service	000*
Only ring 000 if the incident presents an immediate threat to human health or property and requires Emergency Services. If the incident does not require an initial combat agency or once the 000 call has been made, notify as listed below:			
2	Appropriate regulatory authority (if not the EPA)	EPA	131 555
3	Ministry of Health	Public Health Unit – South Eastern Sydney	Normal hours 02 9382 8333 After hours 02 9515 6111
4	SafeWork NSW	Information Line	131 050
5	Local Council	Inner West Council City of Canterbury Bankstown	(02) 9392 5000 (02) 9707 9000
6	Fire and Rescue NSW	Operational Communications	1300 729 579

When notifying authorities that a pollution incident has occurred, the following information must be provided:

1. The time, date, nature, duration and location of the incident
2. The location of the place where pollution is occurring or is likely to occur
3. The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
4. The circumstances in which the incident occurred (including the cause of the incident, if known)
5. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

The information required is the information known to the person notifying the incident when the notification is required to be given.

If the information required to be included in a notice of a pollution incident under items iii, iv and v is not known when the initial notification is made but becomes known afterwards, that information must be notified immediately after it becomes known.

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
Release from sediment dam/water treatment plant or holding tank (including aqueduct during hydrostatic testing)	Siltation of watercourse	Avoid entering the watercourse Cease pumping any water Evacuate Sydenham Pit during Hydrostatic testing	Downstream users Sydney Water during Sydenham Pit/Hydrostatic testing works	3 hours When water has been removed	Door knock Telephone Letter drop
Chemical spill entering drain	Exposure to chemicals	Avoid entering drain Don't drink any water originating from drain	Adjacent residents / businesses	3 hours When cleaned up	Door knock Telephone Letter drop
Gas leak	Exposure to toxic gases	Contain the leak Evacuate the area	Adjacent residents / businesses	Immediately When gas leak contained	Door knock Telephone Letter drop

Risk Assessment

Refer to Section 1.4

Pollutant Inventory

Potential Contaminant	Location on Site	Type of Containment	Maximum Quantity on site
Diesel / Petrol	Site Compound	Jerry cans Double skinned bunded tank	10 000L
Stormwater	Various	Water Tanks Water treatment plants Excavations Aqueduct during Hydrostatic testing	300kL 3.4 ML
Oil	Site Compound	200L bunded drums	1000L
Grease	Site Compound	20 litre bunded containers	100L
Gas	Site Compound	Up to 200L bottles	2000L
Effluent	Site Compound	Ablution tanks	18000L

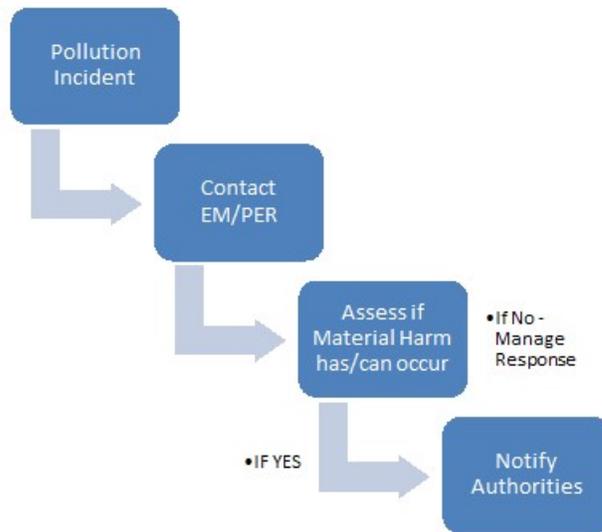
Environmental Control Maps (ECM)

The ECM 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
- The discharge locations of the stormwater drains to the nearest watercourse or water body.

Pollution Incident Management

Internal Notification



External notification

If material harm has occurred or there is potential for material to occur, then the external notification protocol must 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.

Pollution Incident Response Scenarios

Refer to Sections 14 to 17.

Coronavirus Prevention Measures

The NSW government may enact a range of coronavirus prevention measures, including stay at home orders or a pause to construction. These measures may lead to changes in operating risk with respect to managing environmental compliance. Additional risks may include;

- Reduced monitoring and inspections
- Reduced personnel available to respond to pollution events or undertake critical tasks (such as pumping and maintenance)

- Reduced response times to unforeseen events

In the event of authorities implementing public health orders that may impact upon response to pollution incidents or site monitoring, JHLOR will implement the following measures as far as feasible and reasonable;

- Pause high risk activities where possible
- Implement a shutdown inspection and action close out procedure
- Undertake a Sydenham Pit evacuation
- Maintain a site presence where legal and safe to do so to monitor site conditions, including the occurrence of any incident
- Maintain works, where safe and legal to do so to mitigate the risk of a pollution event occurring.
- Implement the requirements of the CEMP, sub-plans, Environmental Management System and the PIRMP, including any incident response procedures where legal and safe to do so.

Business Continuity

The NSW EPA recommends that in the case of a crisis or incident that a Business Continuity Plan is enacted.

A business continuity plan sets out how a business will prepare for, and continue operating after, an incident or crisis. This may include

- identifying alternative measures where needed to minimise risks to the environment and human health
- priority responsibilities of maintaining and operating pollution control equipment, and storing, transporting and disposing of waste appropriately
- considering other challenges such as staffing issues or disruptions to the supply chain or communications.

In relation to the coronavirus prevention measures, in particular the construction shutdown, JHLOR will undertake the following with respect to each of the dot points listed above;

- High risk tasks will be ceased on the project and only monitoring and observations will continue
- Ongoing monitoring on a rotating roster will occur, undertaken by competent people. The monitoring will include review of environmental controls, undertaking of any critical works to mitigate the risk of an environmental incident or responding to an incident. Any waste on site will be monitored to ensure it remains in appropriate storage. Waste on site is to be reviewed as part of any pre-shutdown inspection.
- Monitoring will be undertaken on a roster with back-up personnel on call. Rosters will be developed to minimise physical distance/interaction between personnel. The supply chain will be kept informed via email, and phone call where necessary, in regards to compliance with coronavirus prevention measures and site environmental compliance requirements