Pollution Incident Response Management Plan

M6 Stage 1

November 2021

EPL 21600

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
LICENCE NUMBER: 21600

Approved by:	[redacted]	**Signature:**	[redacted]
Position/Title:		**Date:**	

PURPOSE

CPB Contractors, Ghella, UGL Engineering (CGU) joint venture holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the M6 Stage 1 Project (the Project). As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan will be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

This plan has been developed in accordance with the POEO Act, the *Protection of the Environment Operations (General) Regulation 2009* and with reference to the *Guideline: Pollution incident response management plans* (EPA, 2020) and details the requirements for responding to a pollution incident.

Environment Protection Licence (EPL) Details	
Name of licensee (including ABN)**:**	CPB Contractors, Ghella, UGL Engineering Joint Venture (ABN 98 000 893 6678)
EPL number:	EPL 21600
Premise name and address:	M6 Stage 1 Motorway, Between Arncliffe and Kogarah, and Earlwood and Kogarah.
Website address:	https://caportal.com.au/rms/m6
Scheduled activity/activities on EPL:	Road construction
Fee-based activity/activities on EPL:	Road construction (>=50,000T & <10km) (> 2000000.00 Remaining extraction or processing)

Pollution incident – person/s responsible

Pollution incident – person/s responsible, continued

Notification of relevant authorities	
Relevant authorities include:	**Contact number/s:**
Fire & Rescue NSW	1300 729 579
EPA	131 555
Ministry of Health (NSW Health)	02 9391 9000
SafeWork NSW	131 050
24-hour Community Information Line	1800 789 297

Notification of relevant authorities, continued	
Local authority/s	**Contact number/s:**

Bayside Council	1300 581 299
Georges River Council	02 9330 6400
Canterbury Bankstown Council	02 9707 9000
Department of Planning Industry and Environment (DPIE)	1300 305 695
Transport for New South Wales	02 8202 2200

Notification of neighbours and the local community

Notification of neighbours and the local community will occur in accordance with the Communication Strategy (M6S1-CGU-NWW-CYCG-MPL-000900) and will follow the steps below.

Step	Action
Step 1	The Stakeholder and Community Relations Manager will be notified of the incident by the Environmental and Sustainability Manager and/or Project Safety Director.
Step 2	The Stakeholder and Community Relations Manager and the Environmental and Sustainability Manager and/or Safety Director will determine if the community is at risk from the emergency or incident.
Step 3	If it is determined that the emergency or incident does not impact the community no further action is required.
Step 4	If it is determined that members of the community will be impacted, the Stakeholder and Community Relations Manager will prepare an appropriate notification to the community (dependent upon the circumstances) in consultation with the Project Director and with TfNSW.
Step 5	Should a media response be required, it is the responsibility of CGU to provide the appropriate information with technical input from the Project Director.
Step 6	No staff member has authority to speak with the media.
Step 7	In the event that the emergency or incident is unable to be contained or managed in a safe manner using site resources and intervention by an Emergency Service is required, the relevant emergency service will direct and control the response to the incident including any evacuation or rescue of any community stakeholders.
Step 8	Any further follow up required after the incident will be undertaken by the Stakeholder and Community Relations Manager in consultation with TfNSW.

Description and likelihood of hazards

The Aspects and Impacts Register and risk assessment matrix is provided in Appendix A2 of the Construction Environmental Management Plan (CEMP) (M6S1-CGU-NWW-ENPE-MPL-000400) presents a risk assessment covering Project hazards and the potential risks to the environment if an incident were to occur in terms of consequence and likelihood. The risk assessment takes into account:

- The location of the hazard and its proximity to sensitive receivers;
- The volume of the hazard (if applicable) at that location;
- The type of hazard; and
- Its potential consequence on the receiving environment.

Site Environmental Plans have been prepared for each site within the premise. They identify environmental recievers and the locations of potential hazards (e.g. chemical storage), environmental controls and mitigation measures (e.g. noise walls, haul roads), and emergency equipment (e.g. spill kits). Site Environmental Plans must be reviewed and updated in accordance with the CEMP to ensure they are current, and be available and visible on each site. Training (induction, toolbox talks and prestarts) will also utilise the Site Environmnetal Plans to help explain risks to personnel and the location and use of mitigations.

Pre-emptive actions to be taken

All aspects of the Project with potential to impact on the environment are identified in the CEMP, associated sub-plans and site specific Site Environment Plans (SEPs).

The CEMP and sub-plans detail the management measures, controls and responsibilities required to carry out the environmental objectives of the Project, prevent pollution incidents and to minimise impacts to the environment. The CEMP and associated sub-plans apply to all persons working on the Project.

Inventory of pollutants

An inventory of known potential pollutants at each of the relevant premises is provided below in Table 1. This table will be updated progressively as pollutant quantities become known, and compounds C4 – C6 (shaded) will be populated prior to works commencing at these locations.

Table 1 Inventory of potential pollutants

Pollutant	Location					
	C1	C2	C3	C4*	C5*	C6
Concrete washout water Flash, cement, retarder	Varies	Varies	Varies			

Degreasers (litres)	400	200	200			
Diesel (L)	50,000	20,000	20,000			
Grease (kg)	500	500	250			
Ground conditioner (foaming agent) (kg)	300	300	300			
Ocy/acetylene (G size cylinders)	60	40	40			
Oil (L)	7,100	5,800	5,300			
Paints and surface coatings (spray cans)	100	100	100			
Pesticides	TBC	TBC	TBC			
Petrol (L)	-	-	-			
Sewage						
Soil stabilisers	2,000	1,000	2,000			
Waste oil (L)	3,000	2,000	2,000			
Water treatment chemicals (L)	44,000	19,000	44,000			
Workshop materials (e.g. degreasers, consumables, waste oil for collection or recycling) (L)	6,000	6,000	6,000			

Safety equipment

The following equipment is provided to prevent or control and assist with pollution incidents. The locations of these equipment are within the worksite and main site compounds as appropriate and are indicated in SEPs, where applicable:

- Spill Kits – in key locations across the Project;
- Safety Data Sheets (SDS) - in designated chemical storage containers/main site compounds; and
- Sediment control and containment equipment including sandbags, gravel, geofabric and sediment fences.

Other plant and equipment present at the site or sourced externally may be used in the management of any pollution incident, including for example excavators, sucker trucks etc. The equipment required to be utilised in response to a pollution incident would be determined by the Superintendent in consultation with the Environmental and Sustainability Manager.

Emergency Response Plans and maps are displayed in strategic locations within site offices/ notice boards, identifying safety equipment locations on-site (e.g. fire extinguishers, hose reels), assembly and evacuation points. SDS of materials are maintained in the CGU Materials (including Hazardous Substance) Register and in chemical/material containers on-site.

Communicating with neighbours and the local community

The Stakeholder and Community Relations Manager, in consultation with TfNSW, coordinates all community and stakeholder communications and interactions for the Project. The process for notification of stakeholders of an emergency or incident relates directly to the nature of the hazard. In the event that there is an unacceptable risk to the community from the emergency or incident, the impacted community stakeholders will be notified. In the event of a pollution emergency, the Environmental and Sustainability Manager will be notified to implement the PIRMP. Mechanisms for early warnings, notification of emergency construction works or ongoing regular updates to the community for pollution incidents that have caused or are threatening the environment may include:

- Door knock of residents, businesses and others (e.g. schools) potentially impacted by the incident;
- Phone contact/messages/social media networks;
- Distribution of advice to residents, businesses and vehicle owners, pedestrians, commuters and schools as required;
- Publication of information on the Project website;
- Dissemination of information to local and metropolitan media via TfNSW;
- Liaison with local council and other government stakeholders;
- Liaison with utilities providers; and
- Installation of temporary directional signage.

In the event of a pollution incident which has potential to impact the local community, the Environmental and Sustainability Manager shall advise the Stakeholder and Community Relations Manager. The Stakeholder and Community Relations Manager will determine, in consultation with the Project Director and TfNSW, if community notification is required, and the mechanism by which notification shall be made. Notification of residents, businesses or other Project that may be affected by the pollution incident will include the following information:

- Details of the pollution incident and extent of impact (as known at the time);
- Safety warnings and recommendations to prevent/minimise impacts, if required; and
- Potential impacts on the operation of local businesses, if required.

The area which may be affected by a pollution incident is dependent on the transport vector (water, air or land), pollutant (type, concentration and concentration) and meteorological conditions. The Environmental and Sustainability Manager, in consultation with the Stakeholder and Community Relations Manager, will determine an appropriate geographical extent of the public notification and details to be provided in the notification.

In accordance with the Communication Strategy (M6S1-CGU-NWW-CYCG-MPL-000900) the following steps will be undertaken to notify the community of an emergency or incident.

Minimising harm to persons on the premises

Any mitigation, clean up, corrective or preventative actions are to be undertaken in accordance with the CEMP (and associated sub-plans) and relevant safety, emergency, incident and crisis management plans and procedures. The Safety Director determines and coordinates the response actions to be taken to prevent or minimise any safety or health impacts to site personnel, neighbours, or the community.

Specific environmental and incident management plans detailing mitigation measures are outlined below:

- CEMP (M6S1-CGU-NWW-ENPE-MPL-000400) and associated sub-plans; and
- Site Environmental Plans (SEPs).

Maps

Maps have been provided in Appendices A to C which show:

- Location of premise to which the licence relates;
- Stormwater channels and drains;
- Surrounding area potentially affected by a pollution incident; and
- Location of potential pollutants on Premises.

Actions to be taken during or immediately after a pollution incident

To mitigate potential risks to human health and/or the environment immediately after a pollution incident, the steps in the table below will be followed. These steps include early warning, updates and actions to be taken during or immediately after a pollution incident to reduce risks to human health and/or the environment.

Step	Action	Responsibility
Step 1	Immediately advise key contacts that pollution has occurred or is occurring. Direct verbal contact must be made.. Where a person is not able to be contacted, the worker is to attempt to contact the next listed person until contact is made. Note: sending an SMS/text/email and/or leaving a voicemail message does not constitute contact	All personnel
Step 2	Immediately notify key contacts that pollution has occurred or is occurring.	Environmental and Sustainability Manager
Step 3	Immediately Notify Authorities of the pollution incident.	Environmental and Sustainability Manager

Step 4	Implement actions to minimise and control any pollution and ensure the safety of site personnel, neighbours and the community.	All personnel, with leadership from Site Supervisor, Environment and Safety and relevant construction personnel
Step 5	Implement action to clean up pollution and dispose of waste appropriately.	Environment/Safety personnel with Site Supervisors (including subcontractor's personnel)
Step 6	Determine if neighbours or the community are affected and method of community notification.	Stakeholder and Community Relations Manager, in consultation with TfNSW
Step 7	Notify neighbours and the community of the pollution incident (if required).	Stakeholder and Community Relations Manager in consultation with TfNSW

Any mitigation, clean up, corrective or preventative actions are to be undertaken in accordance with the CEMP (and associated sub-plans) and relevant safety related emergency and incident management plans and procedures.

Environment /Safety personnel with Site Supervisors (including subcontractor's personnel) will implement action to clean up pollution and dispose of waste appropriately as required.

Coordinating with persons

The Stakeholder and Community Relations Manager (in consultation with TfNSW) coordinates all community and stakeholder communications and interactions for the Project. The Environmental and Sustainability Manager shall immediately notify the relevant Regulatory Authority and Other Authorities, in consultation with the TfNSW and the Environmental Representative.

Coordination with authorities (or other persons that have been notified such as the Environmental Representative) will occur in accordance with the Communication Strategy (M6S1-CGU-NWW-CYCG-MPL-000900).

Staff training

All relevant personnel, subcontractors and visitors will receive training to ensure that they are fully aware of their roles and responsibilities in the event of an incident or emergency arising. Training will generally be provided through:

- Project Induction (including environmental induction):
  - Provided to all personnel & subcontractors before commencement of works;
  - Content includes basic emergency procedures, incident reporting and environmental requirements;

- Includes information about the arrangements that will apply if a site emergency occurs and an evacuation is necessary; and
- Community awareness (location of sensitive receivers in relation to the work sites).

Short-term visitors to site will be required to attend a visitor's induction and be accompanied by inducted personnel at all times. Temporary visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

- Toolbox Talks:
  - Toolbox talks will inform personnel of environmental risks and controls.
  - Relevant issues addressed in toolbox talks include:
    - Erosion and sedimentation controls;
    - Hours of work, out of hours work permits and restrictions on high noise intensive works;
    - Emergency and spill response and incident reporting;
    - Management of emissions from plant and vehicles;
    - Dust control and stop work procedure;
    - Wet weather shutdown procedure and responsibilities;
    - Community awareness (location of sensitive receivers in relation to specific activities); and
    - Recent incidents, near misses, and potential issues relating to upcoming works.
- Daily Pre-Start Meeting:
  - Outline environmental issues that could potentially impact activities during the day.

Records of inductions and training will be maintained by the Safety and Environment Team including the topic of the training carried out, dates, names and trainer details.

Inductees will be required to sign-off that they have been informed of the environmental issues and that they understand their responsibilities. The Environmental and Sustainability Manager will review training requirements and monitor program implementation on an ongoing basis.

Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident. Testing of the PIRMP will be integrated into other emergency and incident testing and training programs and may include a desktop simulation, practical exercise or drill.

The Environmental and Sustainability Manager shall determine the method and date of testing, and shall coordinate the test, including advising all relevant personnel as required prior to the test. As a minimum the PIRMP shall be tested at least once every 12 months or whenever there is a significant change to site activities.

Additional testing may occur at the discretion of the Environmental and Sustainability Manager and will be carried out in such a manner as to ensure the information included in the plan is accurate and up to date and that each plan is capable of being implemented in a workable and effective manner.

Testing will be undertaken:

- On an annual basis as part of a mock exercise; and

- Within 1 month following an incident that results in activation of the PIRMP (this may be desktop-based review).

A report detailing a record of the testing of the PIRMP will be prepared after each test of the PIRMP. The report shall recommend amendments to the PIRMP, if required, to ensure that the PIRMP is workable and effective in achieving the stated objectives. The PIRMP Test Report may also recommend amendment to other plans and procedures associated with the test. PIRMP testing details are provided in the table below.

PIRMP testing details

Date Tested	Tested By	Details of Test	Findings of Test	Next Test Date

The PIRMP will be updated by the Environmental and Sustainability Manager in response to the following:

- Any recommendation made in the PIRMP test report;
- Any changes in law that necessitate amendment to the PIRMP; and
- Whenever this plan has been used to conduct an exercise or drill, details shall be recorded and retained on file.

Identified improvements will be included in future revisions of this plan.

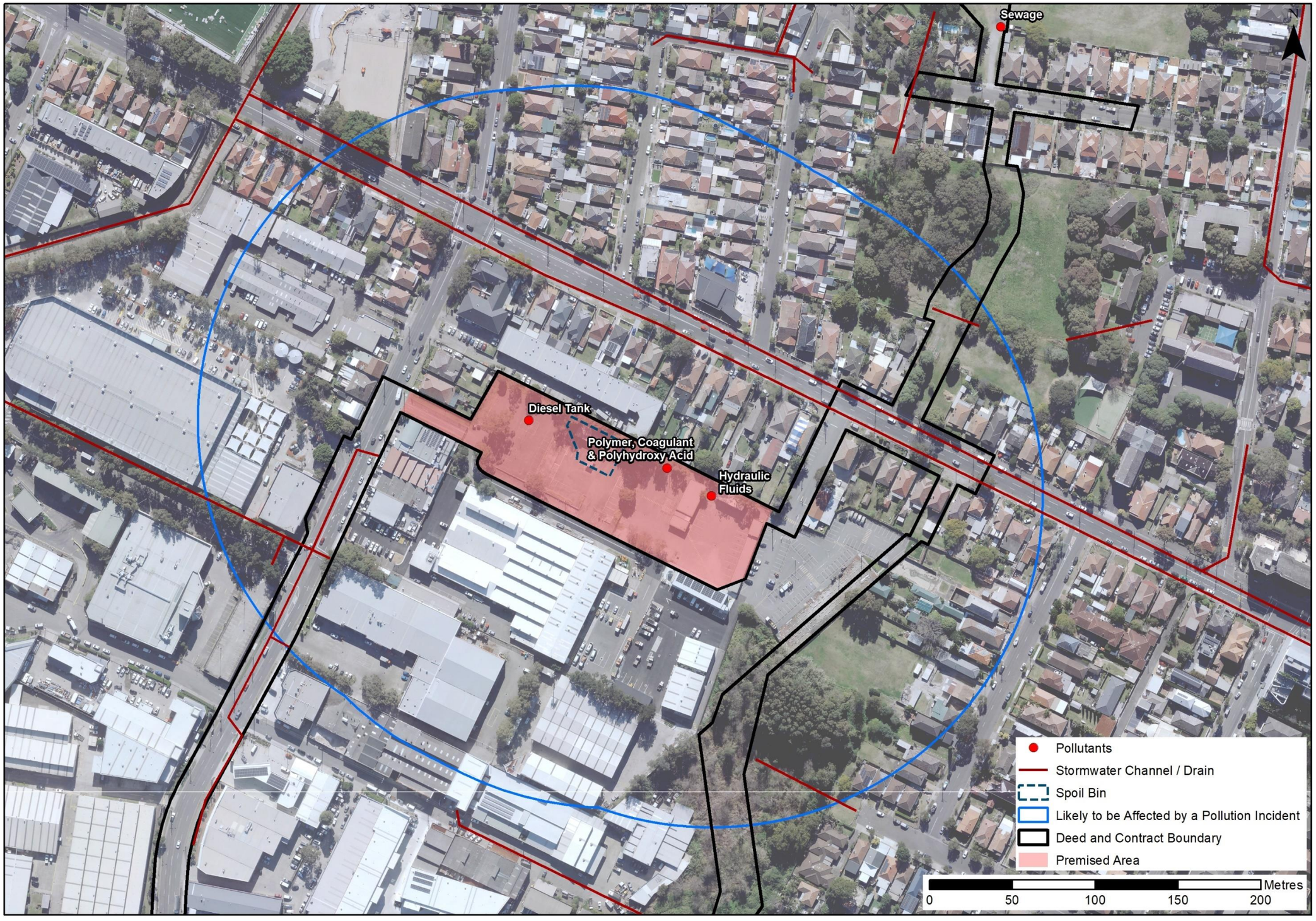
Details of PIRMP updates are provided in the table below.

Date Updated	Reason for Update	Details of Update	Date uploaded	Date of Completion
08/11/2021	Licence issued	Finalised in consideration of issued licence conditions	09/11/2021	09/11/2021

Appendix A - Maps

C1 Construction Ancillary Facility

C2 Construction Ancillary Facility



C3 Construction Ancillary Facility