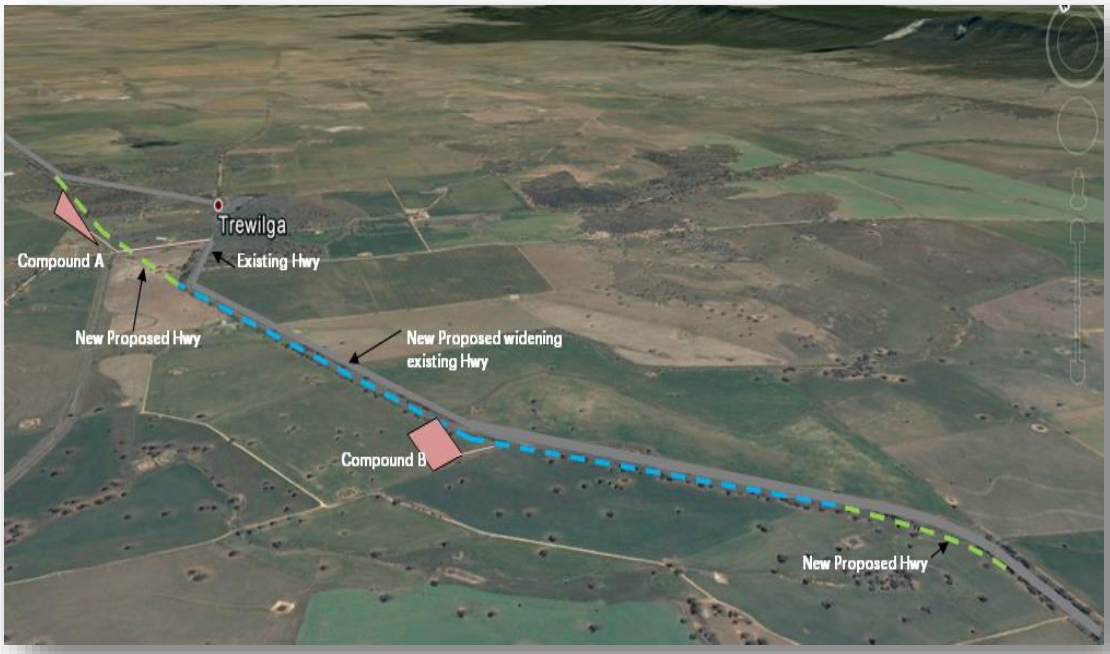
HASLIN

Pollution Incident Response Management Plan

Newell Highway Trewilga Realignment



Transport Roads & Maritime Services
NSW GOVERNMENT

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Issue	Date	Revision description
1	12/4/16	Initial revision
2	27/9/17	Review and updates to roles and responsibilities

1 Introduction

Roads and Maritime Services (Roads and Maritime) proposes to upgrade and realign about 6.4 kilometres of the Newell Highway at Trewilga (refer to Figure 1-1) in order to improve the safety of the highway for road users and increase the speed limit to 110 kilometres per hour. The proposal extends from about 36.7 kilometres to 43.1 kilometres north of Parkes ('the proposal') in central NSW. The proposal would involve realignment of sections of the highway, widening of the road formation to provide a 1 metre wide centreline and 1.5 metre sealed shoulders. The clear zone would be extended on both sides of the highway to improve safety by removing vegetation. The two existing vehicle lanes would be retained. Seven new culverts under the highway, including a new bridge-sized box culvert at Ten Mile Creek, would be constructed and three existing culverts under the highway would be extended. Two new truck parking areas would also be provided.

The proposal would be located in the Parkes Local Government Area (LGA) and the Roads and Maritime Western Region. The area in the vicinity of the proposal is rural and the main land use is agriculture. There are three ephemeral creeks in the area - Hallinans Creek, Stanfords Creek and Ten Mile Creek. Goobang National Park is located about 10 kilometres to the east of the proposal site. There is a historic cemetery located in the northern area of the proposal site, to the west of the alignment.

The proposal is needed due to safety issues, including a high casualty crash rate; increased heavy vehicle volumes and to upgrade the only rural section of the Newell Highway between Forbes and Gilgandra that has a speed limit of 100 kilometres per hour.

1.1 Purpose and scope

The Protection of Environment Operations Act 1997 (POEO Act) requires holders of an Environment Protection Licence (EPL) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The objectives of this plan are to:

- Address the relevant statutory requirements, including approval conditions, legislation and policy.
- Outline protocols for the comprehensive and timely communication about a pollution incident.
- Identify potential pollution incident risks and outline actions to minimise and manage those risks.
- Outline protocols for the implementation of the plan and associated staff training.
- Detail the monitoring, reporting and reviewing requirements of the plan to ensure it is regularly tested for accuracy, currency and suitability.
- Establish responsibilities and accountabilities of the plan.

This PIRMP should be read in conjunction with other relevant management plans for the site.

The notification of environmental incidents under this PIRMP is only required for those incidents actual or potential harm to the health or safety of human beings or to ecosystems (a material harm incident) as defined by the POEO Act (see 4.1).

2 Statutory requirements

Roads and Maritime's statutory obligations in regard to this plan and material harm incident reporting are contained in the Review of Environmental Factors (REF), Submissions Report, relevant licences and permits and other legislation and guidelines. These are described further below.

2.1 Project approval

The project as described in the "Trewilga Realignment Newell Highway review of environmental factors" (August 2014), "Trewilga Realignment Newell Highway addendum review of environmental factors" (October 2015) and "Realignment of Newell Highway at Trewilga Submissions Report" (September 2015) was determined under sections 111 and 112 of the *Environmental Planning and Assessment Act 1979* by Roads and Maritime Services on 18 September 2015.

The project approval specifies a variety of conditions to be met by Roads and Maritime to minimise environmental impacts of the project. These are incorporated in this PIRMP where applicable.

2.2 Protection of the Environment Operations Act 1997

Section 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation) outlines the specific requirements for inclusion in a PIRMP.

Table 2-1 lists the information required in a PIRMP as per Section 153C of the POEO Act and details where this information is presented in this PIRMP.

Table 2-1: PIRMP information requirement (POEO Act)

Information Required	Section
a) The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and	5.1.2
(ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and	5.1.2
(iii) any persons or authorities required to be notified by Part 5.7,	5.1.1
b) A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,	4.3, 5
c) The procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,	5, 6
d) Any other matter required by the regulations.	Table 2-2

Table 2-2 lists the information required in a PIRMP as per Section 98C of the POEO (G) Regulation and details where this information is presented in this PIRMP.

Table 2-2: PIRMP information requirement (POEO (General) Regulation)

Information Required	Section
a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity).	Table 3-1, Appendix A
b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	Appendix A
c) Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.	3.3, Appendix A
d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity.	3.4
e) The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.	3.4
f) A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.	3.5, Appendix A
g) The names, positions and 24-hour contact details of those key individuals who:	5.1
(i) are responsible for activating the plan, and	Table 4-1
(ii) are authorised to notify relevant authorities under section 148 of the Act, and	Table 4-1
(iii) are responsible for managing the response to a pollution incident.	Table 4-1
h) The contact details of each relevant authority referred to in section 148 of the Act,	Figure 5-1
i) Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.	5.1.2
j) The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.	3.6, Appendix A
k) A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.	Figure 3-1, Figure 3-2
l) A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.	3.4, Appendix A
m) The nature and objectives of any staff training program in relation to the plan.	6.1
n) The dates on which the plan has been tested and the name of the person who carried out the test.	6.2.1
o) The dates on which the plan is updated.	6.2.2
p) The manner in which the plan is to be tested and maintained.	6.2.2

3 Site details

3.1 Overview

Roads and Maritime proposes to upgrade about 6.4 kilometres of the Newell Highway from about 36.7 kilometres (chainage 36660) to 43.1 kilometres (chainage 43050) north of Parkes in order to improve the safety of the highway for road users and increase the design speed to 110 kilometres per hour. The highway would generally be upgraded to a route standard formation of 11 metres, comprising two 3.5 metre travel lanes, a 1 metre wide centreline and two 1.5 metre wide sealed shoulders. A 0.5 metre sealed verge, batters (4:1 or 2:1) and table drains would be constructed along the length of the proposal. The proposal has been broken down into two stages:

- Stage 1 of the proposed works includes the upgrade from the southern limit of works to about chainage 40160.
- Stage 2 of the proposed works includes the upgrade from chainage 40160 to the northern limit of works.

Realignment

The Newell Highway would be realigned at the following three locations:

- Horizontal realignment of Curve 1, Hallinans Creek (chainage 36660 to chainage 37580) to about 30 metres west of the existing alignment
- Vertical realignment of Curve 2, (chainage 38040 to chainage 38670). The vertical realignment involves removing the crest to improve sight distance
- Horizontal realignment of Curve 3, about 3.1 kilometres of the Newell Highway from chainage 40160 to chainage 43050, to about 600 metres west of the existing alignment

Formation widening

- Widening of Straight 1 (chainage 37580 to chainage 38040) to achieve a 1 metre wide centreline and 1.5 metre sealed shoulders
- Widening of Straight 2 (chainage 38670 to chainage 40160) to achieve 1 metre wide centreline and 1.5 metre sealed shoulders.

Clear zones in the road reserve

The following clear zones would be established:

- Six metre clear zone on the inside of Hallinans Creek Curve (western side, Curve 1) and the inside of Curve 2 (eastern side)
- Ten metre clear zone on the outside of curves in Stage 1 except where wire safety barrier is used. This comprises Curve 2 (western side) and parts of Curve 1 (a wire rope safety barrier would be used around most of the outside of Curve 1)
- Eight metre clear zone for the remainder of Stage 1: Straight 1, Straight 2 and the northern end of the project from chainage 41980 to chainage 43050, except where wire rope safety barrier is used
- Eleven metre clear zone for Stage 2, from chainage 40160 to 41980.

Wire rope safety barriers would be installed at nine locations. Wire rope safety barriers would be installed at the top of the batter and there would be no clear zones in these locations.

Waterway crossings and drainage

The proposal would require the construction or the extension of a number of culverts at drainage lines or creeks to accommodate the widened highway. This would comprise the construction seven new culverts, including five bridge sized box culverts. The proposal would also require the extension of four existing culverts including one bridge sized culvert. Rock mattresses would be installed at all culverts to prevent scouring. The location and extent of scour protection measures would be confirmed during detailed design. Table drains would be constructed at the road side to collect stormwater from the highway.

Changes to local road network

The local road network in the vicinity of the proposal would be modified:

- About 900 metres of the existing highway would permanently closed to traffic. This section of the highway would be removed and trees would be planted in this area
- The existing highway from north of Furner Lane to below Kadina Road would remain open and provide access to properties
- Extension of Kadina Road about 100 metres west of the existing highway alignment to form a junction with the proposed highway alignment
- The intersection of Trewilga Road would be moved to the west of its existing location. Therefore access from Trewilga Road to the proposed highway alignment would be provided from the west of the highway. The section of
- Trewilga Road between the existing and proposed Newell Highway alignment would be closed. The closure would not affect the existing property access on Trewilga Road. There would be no access from Trewilga Road to the proposed alignment from the east
- Provision of a 1.32 kilometre northbound overtaking lane
- Provision of a bus turning area at Kadina Road
- Provision of northbound (chainage 41100 to chainage 41250) and southbound (chainage 41750 to chainage 41900) truck parking bays that are 150m long and 6.5m wide
- Provision of protected right turn bays “Type CHR” and auxiliary left turn lanes
- “Type AUL” at the Kadina Road and Trewilga Road intersections.

The proposal would also include:

- Temporary construction sites at the following existing cleared areas: Compound/stockpile site and borrow pit at northern extent of proposal on the western side of the new alignment – about 3.8 hectares in area
- Compound/stockpile site at the northern extent of the proposal on the eastern side of the new alignment – about 0.7 hectares in area
- Compound/stockpile site at the south eastern corner of the proposed Kadina Road intersection with the realigned highway – 0.14 hectares in area
- Compound/stockpile site adjacent to Curve 2 (subject to lease agreement) on the western side of the alignment – about 1.9 hectares in area
- Installation of new fencing at the edge of the road corridor along the proposal length
- Infilling of three farm dams
- Utility adjustments.
- Five property acquisitions.

This PIRMP will address the requirements for entire scope of works and is associated with EPL for the project.

3.2 Major hazards

The following potential hazards to human health and the environment may occur from incidents on the site such as:

- Explosion or fire.
- Escape, spillage or leakage of hazardous substances.
- Leak/spillage of contaminated stormwater.
- Excessive/harmful air emissions (dust, smoke, fumes, etc.).
- Truck collision / spill on site.

A risk assessment for the major pollution hazards related to the project was completed and is attached in Appendix A. The risk assessment was based on Regional Maintenance Delivery's Operational Control Procedures – Risk assessment (Roads and Maritime Services 2013). The assessment evaluates the consequence, likelihood and risk rating of major pollution incidents occurring.

Possible circumstances or events that could increase the likelihood of major hazards occurring are listed inTable 3-1.

Table 3-1: Major hazards and circumstances that could increase the likelihood of their occurrence

Major hazards	Circumstances or events that could increase the likelihood
Explosion or fire.	• Working in high fire danger periods
Escape, spillage or leakage of hazardous substances.	• Failure of storage tanks • Failure of bunded areas • Machine failure
Leak/spillage of contaminated stormwater.	• Failure of storage tanks • Periods of high rainfall
Excessive/ harmful air emissions (dust, smoke, fumes, etc.).	• Using equipment that doesn't comply with emissions standards • Not watering stock piles • Strong winds
Truck collision / spill on site.	• Unsafe driving (e.g. speeding) • Driver(s) affected by alcohol or other drugs

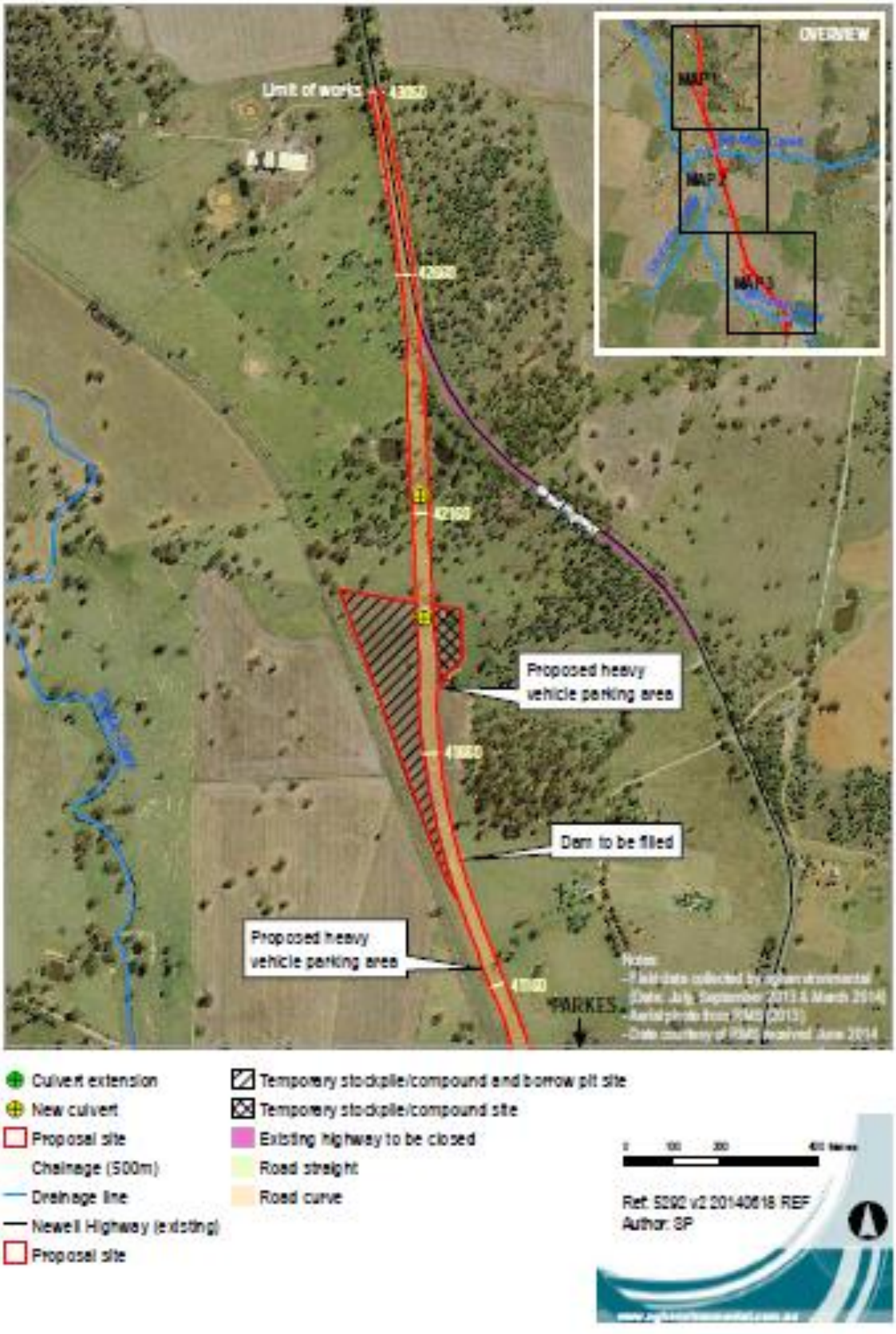


Figure 3-1: Site overview of the title project (map one of three)

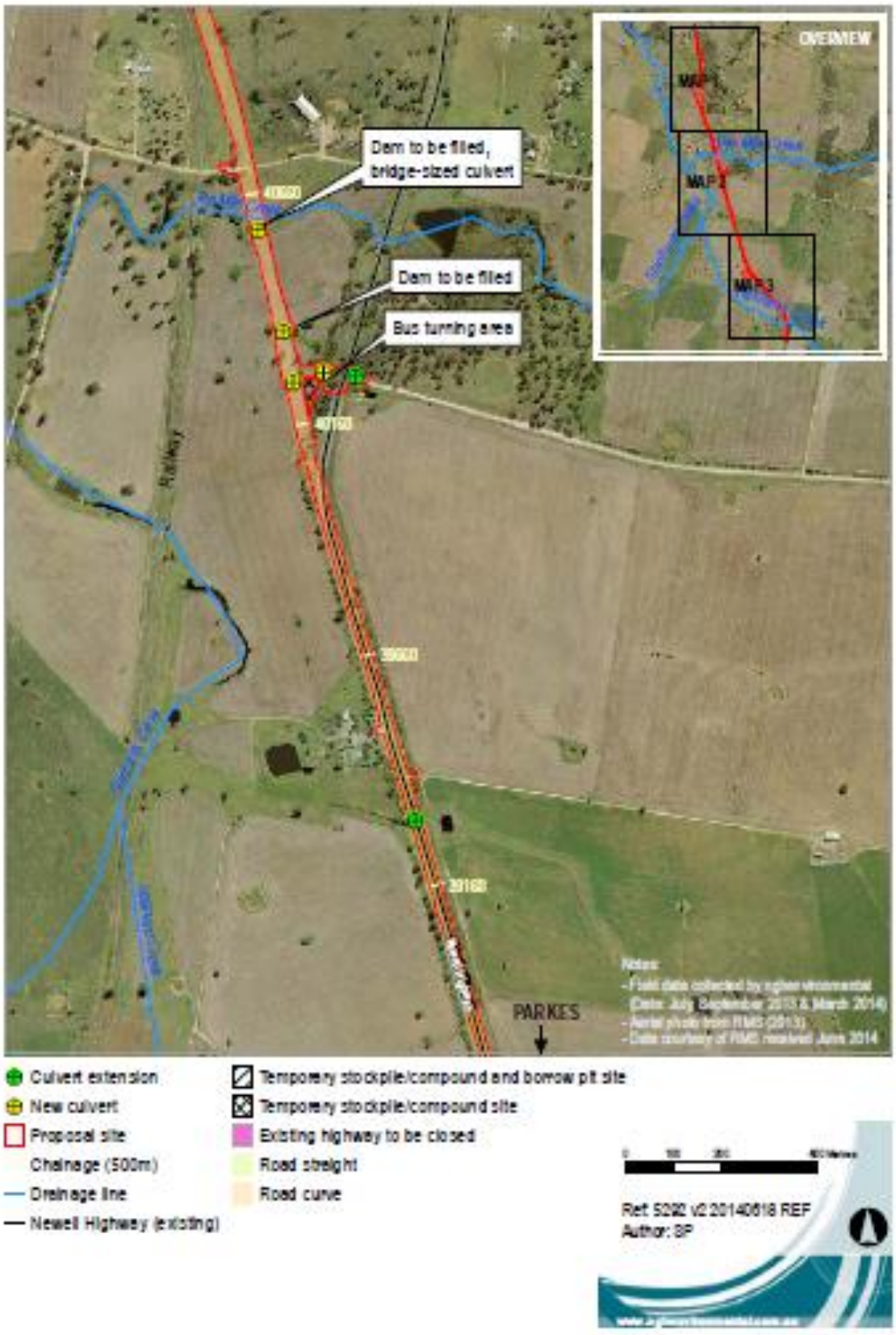


Figure 3-2 :Site overview of the title project (map two of three)

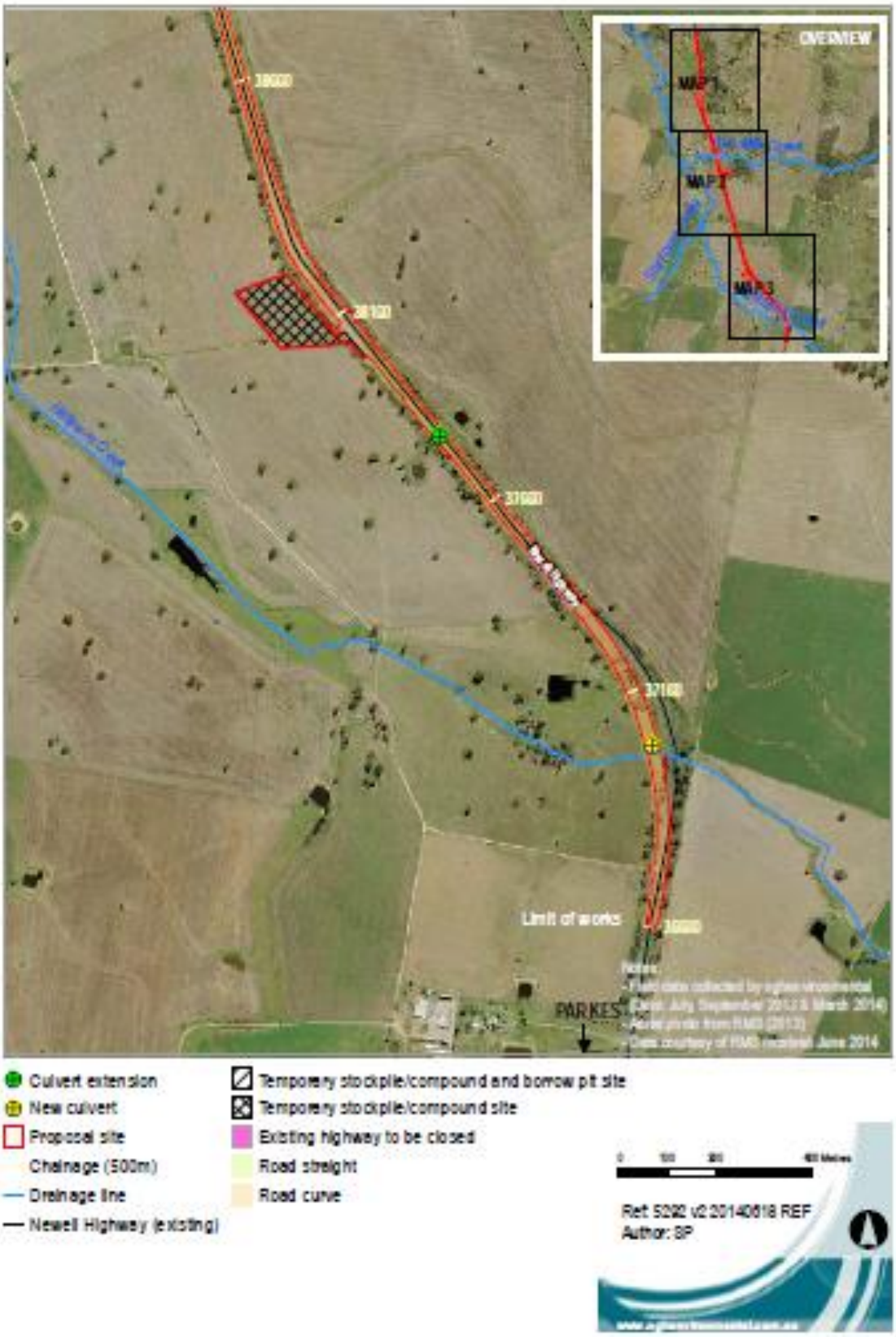


Figure 3-3: Site overview of the title project (map three of three)

3.3 Pre-emptive actions to minimise or prevent any risk of harm

Table 3-2 contains a list of the key pre-emptive actions applied on site to minimise the risk of the potential hazards and incidents.

In addition to the controls listed in Table 3-2 all employees and contractors are to wear appropriate Personal Protective Equipment (PPE) and undergo appropriate safety and environmental training.

Safety equipment and other devices used to contain or control a pollution incident are included in Section 3.5 and Appendix A.

Table 3-2: Pre-emptive actions applied on site to minimise the risk of potential hazards.

Hazard	Pre-emptive Action
Explosion or Fire	• Staff induction and training. • General purpose fire extinguishers and fire extinguishers suitable for oil/fuel fires will be available in all offices, plant and vehicles. • Personnel on site will be familiar or trained in the use of fire-fighting equipment. • Fire-fighting equipment will be maintained regularly. • Fire detection systems will be in place and regularly inspected with each compound building.
Escape, Spillage or Leakage of Hazardous Substance	• Staff induction and training. • Refuelling of plant and equipment will occur in impervious bunded areas away from waterways and drainage line. • Spill kits will be kept at site compound areas and onsite during high risk activities. • All fuel stores will be appropriately bunded. • All bunded areas will be inspected regularly. • All plant will be inspected regularly for leaks. • All appropriate Material Safety Data Sheets will be kept onsite and will be readily accessible
Leak/spillage of contaminated stormwater.	• Staff induction and training. • An Environmental Work Method Statement (EWMS) will be created for any works within waterways (including culverts) or that have a high risk of waterway contamination. • Spill kits will be kept with site compound areas and onsite during high risk activities. • All bunded areas will be inspected regularly. • An erosion and sediment control plan will be developed and implemented for the work.

Excessive dust/smoke emission	• Staff induction and training • Visual surveillance for dust generation will occur at all times. Works must cease when high levels of air-borne dust cannot be controlled. • Any activity causing unacceptable visible emissions would cease until adequate control measures can be implemented • Appropriate use of water carts
Truck/vehicle Collision	• Staff induction and training. • A Vehicle Movement Plan (VMP) will be produced for all ancillary and work sites. • All vehicle operators and delivery drivers will be provided a copy of the VMP prior to arrival onsite. • Emergency services will be contacted as necessary. • First Aid kits will be kept in each vehicle and plant as well as in the site compound

3.4 Pollution inventory

The primary hazardous materials and chemicals (including fuels) used and stored on site and the maximum quantity to be stored on site are listed in Table 3-3. Potential pollutants would be stored in a bunded area when not in use within the site compound areas (refer to

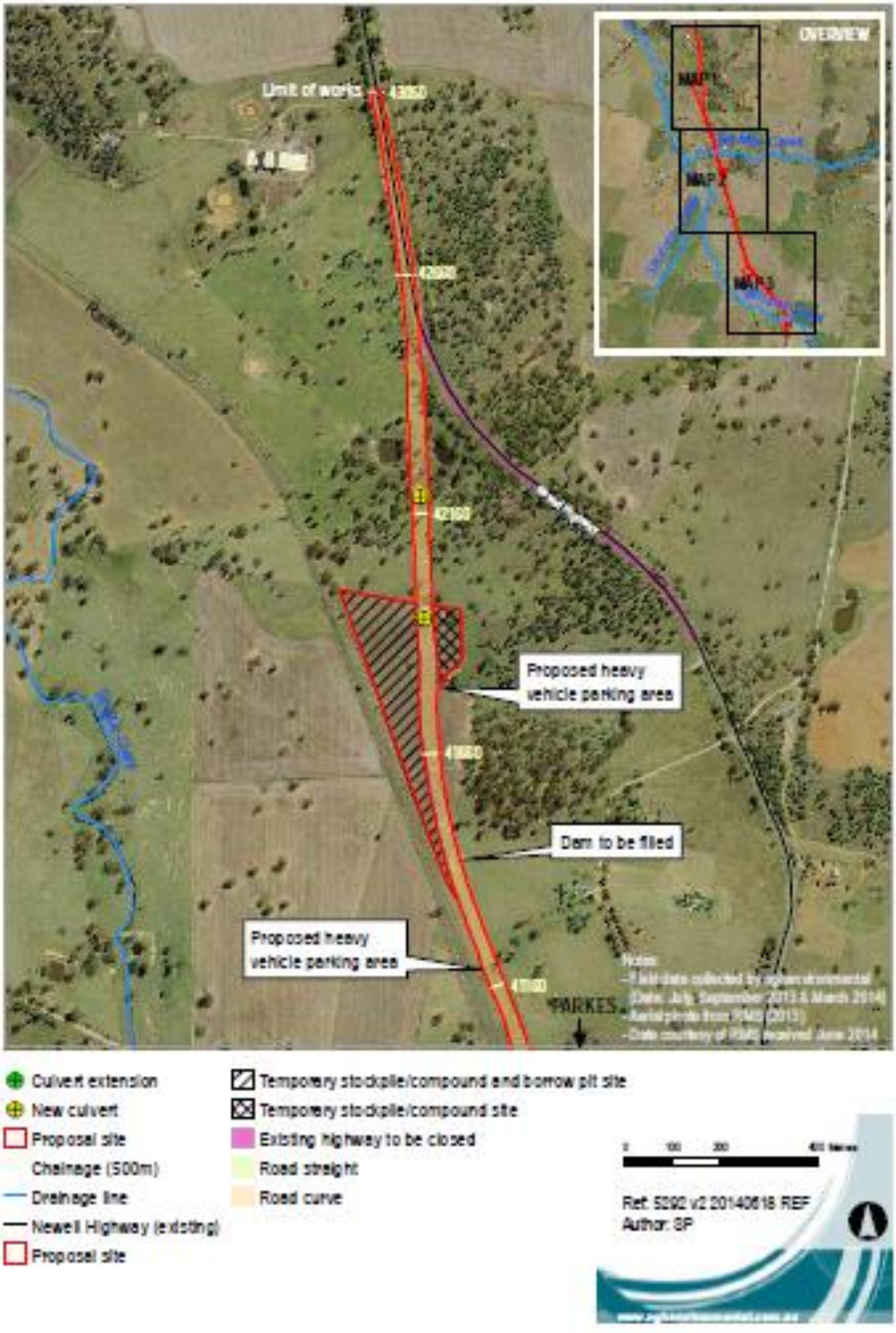


Figure 3-1). Safety equipment and material safety data would also be located within the site compound areas.

Table 3-3: Maximum quantity and location of hazardous materials stored onsite.

Potential Pollutants	Maximum quantity stored onsite (L)	Storage location (also refer to Figure 3-1)
Diesel fuel	205 L	Site Compound
Oil and lubricant	205 L	Site Compound
Grease	20 L	Site Compound
Hydraulic oil	205 L	Site Compound
General cleaning chemicals	20L	Site Compound

3.5 Safety equipment and storage location

A summary of the safety equipment to be kept on site and the location of storage on the premises is presented in Table 3-4 and can be seen on Figure 3-1.

Table 3-4: Safety equipment and location to be stored on site

Safety Equipment	Storage Location of safety equipment
Appropriate fire extinguishers	• On all plant • Site compound
Mobile spill kit	• Site compound • Plant refuelling areas • Onsite when performing high risk activities
Bund equipment	• Refuelling and plant parking areas • Plant wash-down areas • Chemical storage areas
First aid kit	• In site compound • In all site vehicles and plant
Personal Protective Equipment (PPE)	• All personnel will be responsible for storage of their PPE. • Disposable PPE (earplugs) will be stored at the site compound. • Additional PPE will be stored at the site compound for short term use (visitors etc.)

3.6 Minimising harm to persons on the premises

An Emergency Action Plan will be developed for the works and would be implemented throughout the project. The plan includes emergency muster points, first aid kit locations, emergency personnel names and phone numbers and evacuation routes.

4 Incident management

4.1 Pollution incident

A pollution incident is defined in the POEO Act as:

"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."

Potential pollution incidents for the project are described in Section 3.2.

4.2 Material harm

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:

"(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.

4.3 Duty to notify management personnel

All Roads and Maritime employees and contractors are responsible for **immediately** alerting management personnel (Surveillance Officer or Site Officer) to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale. Notification of management personnel is the first step of the incident response protocol; as described in Figure 5-1.

4.4 Key site contacts

The contact details for key individuals who are responsible for activating this plan, including notifying authorities and managing the response to a pollution incident as provided in Table 4-1 below.

Table 4-1: Key site contacts

Name	Role	Mobile Number
Brooke Emmett	Project Manager	0421 354 777
Matthew Francesconi	Construction Manager	0409 987 701
Stuart Light	Environmental Site Representative	0427 932 257
Jeremy Wallis	HSEQ Manager	0438 427 774

5 Incident response protocol

5.1 Response protocol

As discussed in Section 4.3, the notification of an environmental incident is the responsibility of all site and contractor personnel. In the event of an incident, the response protocol outlined below must be followed. This is in accordance with the RMS Environmental Incident Classification and Reporting Procedure.

IMPORTANT NOTE

- The following procedure is to be followed by all HASLIN staff and contractors.
- Any actual or potential material harm to a person's health or wellbeing or the environment as a result of a pollution incident must be reported immediately to the Project Manager on 0421 354 777

As soon as a worker becomes aware of a pollution incident they would **immediately** contact a person responsible for managing the site. If there is an immediate threat to human health or property the site manager would **immediately** contact emergency services and persons who may be in danger. The nominated Environmental Site Representative would determine if the incident is likely to cause material harm to the environment. If material harm is likely, external contacts would be notified **immediately**. The Project Manager, HSEQ Manager and Construction Manager will assist in making an assessment of the incident and determine whether or not to formally notify the incident to the EPA and other relevant authorities.

If for any reason that Construction Manager or HSEQ Manager is not contactable, staff should contact the Project Manager to assist in assessing whether an incident triggers the notification requirement.

If no assistance can be obtained within a reasonable time, you are required to notify the relevant authorities in the order of notification outlined in the table below and provide each agency with the information required in section 2.5 of this procedure. Even if you do not have all the information, you must notify each agency with the information you have at hand and ensure that they are updated as soon as further relevant information becomes available.

In circumstances where there is doubt about the need to notify or the relevance of a particular agency, HASLIN should always err on the side of notification.
When in doubt, communicate!

Relevant authority's notification order

- **If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance**
  - **call Fire and Rescue NSW on 000 first** then
  - EPA environment line 131555
  - The Ministry of Health 60808900
  - WorkCover Authority 131050

- **If there is not an immediate threat to human health or property:**
  - **call** EPA environment line **first** 131555
  - WorkCover Authority 131050
  - Fire and Rescue NSW 1300 729 579

All of the above authorities (whether considered relevant or not) must be contacted for each material harm pollution incident to satisfy notification obligations

5.1.1 The relevant information to provide

Section 150 of the POEO Act provides the information that needs to be notified. It is important to avoid speculation on origin, causes or outcomes of a pollution incident in discussions with the authorities. While it is important not to speculate on the causes of an incident, s150 (1) (d) of the POEO Act requires notification of the circumstances in which the incident occurred (including the cause of the incident, if known) and there is an ongoing duty ensure that relevant information be notified after it becomes known.

Section 150 POEO Act - Relevant information to given

1. The relevant information about a pollution incident required under section 148 consists of the following:
   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, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
   c. the circumstances in which the incident occurred (including the cause of the incident, if known),
   d. the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
   e. other information prescribed by the regulations.
2. The information required by this section 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 by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.

5.2 Post incident-notification procedures

The following general clean up procedure is to be followed:

- Assessment - Assess best clean up procedures for each incident based on the pollutant and site issues.
- Remedial Action - Remove contaminated soil, wastewater and used spill equipment to an appropriate place within the licensed premises for licensed waste disposal and/or remediation.
- Ongoing Actions - Following an incident the following must be undertaken:
  - Undertake further monitoring/ testing if required.
  - Complete HASLIN Incident Report form (within three days of incident).
  - Organise restocking of spill equipment.
  - Complete reports to Authorities, as necessary.
  - Implement corrective actions to avoid reoccurrence.

5.2.1 Incident reporting to the Environment Protection Authority (EPA)

Within 7 days from the date on which the incident occurred, a detailed report must be submitted to the EPA including the following information:

- Describe the date, time, and nature of the incident.
- Identify the cause (or likely cause) of the incident.
- Describe what action has been taken to date.
- Describe the proposed measures to address the incident.

If any of the information was not known at the time of initial reporting of the Pollution Incident to any of the Authorities, that information should be notified to the Authorities immediately after it becomes known.

All communications with any of the Authorities following the incident are to be made in consultation with HASLIN staff. Following the initial notification of the incident, these personnel will ensure that regular contact is made with all Authorities, and persons who have been notified of the incident, in relation to ongoing actions taken to combat the pollution caused by the incident. In particular, these personnel will manage the following:

- Liaison with the EPA regarding appropriate actions to be taken to control, manage and mitigate the pollution.
- Working co-operatively with the EPA and any other relevant authorities to clean-up any pollution.
- Notifying the community of the results of ongoing monitoring of the pollution.
- Consulting any owners or occupiers in the vicinity of the site regarding any off-site actions to be taken which may impact on their properties.

5.2.2 Notification of pollution incident to community / local landholders

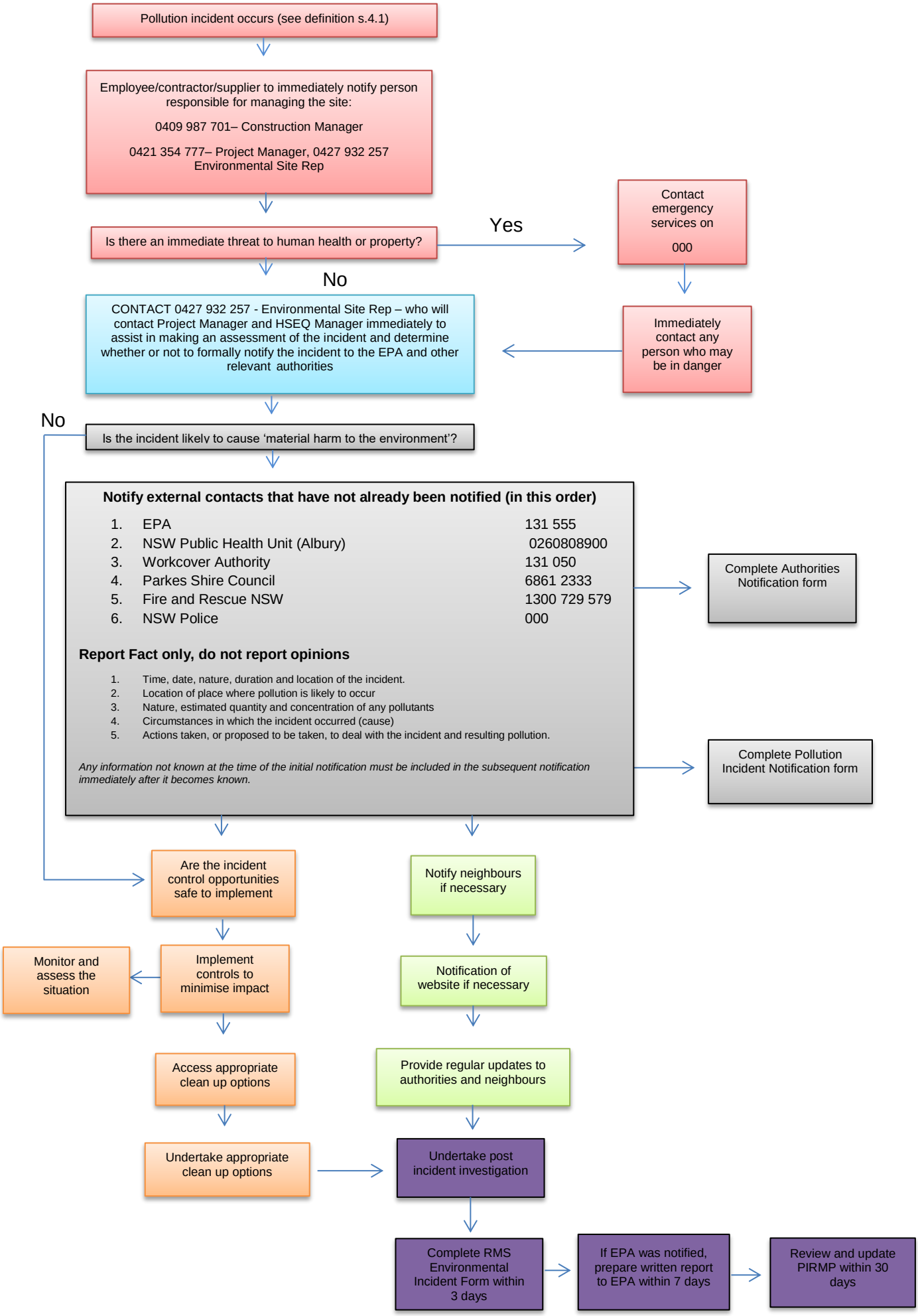
The site is located within the Parks Shire Council Local Government Area. The site is located within the catchment area of the Bogan River. The project is located near the town of Peak Hill and the locality of Trewilga with relatively few adjacent land holders/sensitive receivers. Large scale pollution incidents could potentially affect nearby residents or surrounding agricultural land.

Any Pollution Incident causing or threatening material harm to the environment in these areas will be communicated to all people likely to be adversely affected by the incident.

Communication with these people will be made as soon as practicable following a Pollution Incident as well as on an ongoing basis until the incident has been fully controlled and any harm caused as a result of the incident has been rectified.

HASLIN will contact people affected by a Pollution Incident either by telephone, letterbox drop or 'doorknocking'. The method and content of any communication will depend on the Pollution Incident and the actions required to protect human health. For example, advice may be given to avoid the use of water in creeks affected by the discharge of a pollutant to a waterway.

Figure 5-2: Incident response protocol



6 Reporting, review and training

6.1 Training

All new staff, contractors and visitors to the premise will undergo a site induction. Training programs will ensure all personnel are aware of this PIRMP and the response procedure to a pollution incident. For staff and contractors who are in contact/work with dangerous goods and/or hazardous materials at the premise, specific safety and environmental training will be provided.

Targeted training exercises will also be undertaken for those employees in regard to the safe and correct use of all spill clean-up equipment or pollution prevention structures on site. Training for safe handling and legal disposal of contaminated materials and wastes resulting from an incident will also occur. Refresher training on this PIRMP will also be provided to all staff and contractors if there are any amendments, in addition to periodic refresher training on an annual basis. A training register is attached in **Appendix B**.

6.2 Testing, review and update

6.2.1 Testing of the plan

Testing of the PIRMP will be coordinated by the contractor's nominated representative to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Test results and corrective actions will be submitted to RMS for review. Testing is taken to be either a desktop test or an environmental emergency drill. Testing will include all components of the plan, including training requirements. Records of testing must be provided in the table presented in **Appendix C** of this plan. Information to be retained regarding PIRMP testing includes:

- The manner in which the test was undertaken.
- Dates when the plan has been tested.
- The person who carried out the testing.
- Summary of the training exercise.

6.2.2 Review of the plan

A review of the PIRMP will occur in the following circumstances:

- Every 12 months. Contact details in this document must be kept current at all times.
- A review of the plan should be conducted if a training exercise proves the plan inadequate or improvements are recommended.
- Within one month of the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to determine if the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

The review of the PIRMP will include the following information:

- Date of the review.
- The name of the person who reviewed the plan.
- A summary of changes made to the plan.

6.3 Plan availability

The necessary parts of this PIRMP are publicly available upon request. This includes:

- The procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW.
- The procedures for communicating with the community.

On completion of the annual testing and review process (Section 6.2), or following a test in response to an incident, Roads and Maritime will review and if necessary amend the PIRMP.

A hard copy of the PIRMP will be available at the site office and will be provided to all personnel responsible for implementing the PIRMP. The plan is to be provided to all sub-contractors and utilities on site. The PIRMP will be made available to an EPA Authorised Officer on request.

7 Roles and responsibilities

Role	Responsibility
Construction Manager	• Provide adequate resources for the implementation of this PIRMP. • IMMEDIATELY implement this PIRMP when notified that a Pollution Incident has occurred onsite • Ensure current version of this PIRMP is displayed on the website. • In consultation with Environment Branch, provide written Pollution Incident report to EPA within 7 days on an incident occurring. • Ensure that works areas have spill kits available. • Monitor that works activities are being undertaken in accordance with the pre-emptive measures in this plan. • Ensure that all persons working on site have been inducted in the requirements of this plan and procedures.
Project Manager	• IMMEDIATELY implement this PIRMP when notified that a Pollution Incident has occurred onsite, • Ensure that sub-contractors and utilities on site have copies of the plan. • Monitor that works activities are being undertaken in accordance with the pre-emptive measures in this plan. • Ensure that work areas have spill kits available. • Ensure this PIRMP and contact details are kept up to date. • Ensure that all employees and contractors are given adequate training in identifying and responding to Pollution Incidents and ensure they are aware of the penalties for failing to comply. • Undertake weekly inspections to assess storage facilities and safety and pollution control equipment.
Environment Site Representative	• IMMEDIATELY implement this PIRMP when notified that a Pollution Incident has occurred onsite • Provide advice to site staff where required
HSEQ Manager	• IMMEDIATELY implement this PIRMP when notified that a Pollution Incident has occurred onsite • Ensure current version of this PIRMP is displayed on the website. • Monitor that works activities are being undertaken in accordance with the pre-emptive measures in this plan.

8 References

Environment Protection Authority 2012, Environmental guidelines: Preparation of pollution incident response management plans.

NGH Environmental 2015, Newell Highway Realignment – Trewilga, Review of Environmental Factors, Prepared for Roads and Maritime Services.

Regional Maintenance Delivery 2013, Operational Control Procedures – Risk assessment.

Roads and Maritime Services 2016, Environmental Incident Classification and Reporting Procedure.

Appendix A – Site Risk Assessment

The risk assessment of major hazards for the project was undertaken according to Regional Maintenance Delivery's *Operational Control Procedures – Risk assessment* (2013). The matrix used for the assessment is below.

How severe?	Type	Health & Safety	Environment	Journey management	Customer, reputational	Service delivery	Legal, compliance, regulatory	Finance, profit	How likely? 5 Almost certain	4 Likely	3 Possible	2 Unlikely	1 Rare
	5 Catastrophic	Fatality; debilitating or multiple injuries	Persistent long term >10 years impacts, large group of people affected, OEH/EPA involved, widespread media attention, requires extensive remedial action	Main road or freeway closure for multiple peak periods. Unable to meet ROL conditions for >60 min.	Major news headlines; continuous negative media coverage for days/weeks; major outcry.	>75% over project schedule. Project not able to continue, potential cancellation.	Substantial breach of legal or regulatory requirement; Tier 1 / Cat 1 prosecution. Jail term for staff.	Gross margin negative	10 EXTREME	9 EXTREME	8 EXTREME	7 HIGH	6 HIGH
	4 Major	Severe permanently debilitating or life-threatening injury	Long term 1–10 year impacts, complaint to OEH, likely to attract media attention, requires considerable remedial action and notification to EPA.	Main road or freeway closure for one peak period. Unable to meet ROL conditions for period > 30 min.	Adverse publicity in main media; multiple complaints from wider community	40–75% over project schedule. Project not able to continue without redefinition of scope, functionality or quality.	Substantial breach of legal or regulatory requirement; Tier 2 /Cat 2 prosecution.	Gross margin 0–50% of adjusted target gross margin amount	9 EXTREME	8 EXTREME	7 HIGH	6 HIGH	5 MEDIUM
	3 Moderate	Lost time injury; non–life threatening injury with treatment off site	Medium, up to 1 yr impacts , complaint from community, remedial action required, pollutant within vicinity of site and can be managed with routine procedures	Road disrupted for >30 min outside of peak periods. Unable to meet ROL conditions > 15 < 30 min	Adverse publicity in local media; multiple, repeat complaints from the local community	10–40% over project schedule. Reduction in scope, functionality or quality requiring Client approval.	Breach of legal or regulatory requirement; enforcement action or regulatory notices, Tier 3 / Cat 3 prosecution	Gross margin 50–70% of adjusted target gross margin amount	8 EXTREME	7 HIGH	6 HIGH	5 MEDIUM	4 LOW
	2 Minor	Medical treatment injury	Short term <6 month impacts, mild affect on community, requires some action with minor resources readily available on site	Road network delays experienced up to 30 min outside peak periods. Unable to meet ROL conditions up to 15 min	Minor nuisance that may generate a few complaints from the affected individuals	<10% over project schedule. Minor reduction in schedule, functionality or quality.	Minor non-compliance against legal or regulatory requirement; investigation or report to regulatory authority.	Gross margin 70% to 90% of adjusted target gross margin amount	7 HIGH	6 HIGH	5 MEDIUM	4 LOW	3 LOW
	1 Negligible	First aid treatment injury	Short term <1 week impacts, community not affected, on site incident immediately contained.	Single minor delay on a low network category road outside peak period	No adverse publicity; unlikely to attract attention of local community	Insignificant schedule slippage. Barely noticeable reduction in schedule, functionality or quality.	Low level non-compliance, no infringement, no penalty or prosecution.	Gross margin 90% to 100% of adjusted target gross margin amount	6 HIGH	5 MEDIUM	4 LOW	3 LOW	2 LOW

Hazard	Consequence	Consequence	Likelihood	Risk Rating		Mitigation measures	Residual consequence	Residual likelihood	Residual Risk	
Explosion or Fire	Injury or Death	5	2	7	HIGH	• Staff induction and training • General purpose fire extinguishers and fire extinguishers suitable for oil/fuel fires will be available in all offices, plant and vehicles. • Personnel on site will be familiar or trained in the use of fire-fighting equipment • Fire-fighting equipment will be maintained regularly • Fire detection systems will be in place and regularly inspected with each compound building	4	1	5	MODERATE
	Potential to start bushfire	5	2	7	HIGH		4	1	5	MODERATE
	Property damage	5	2	7	HIGH		4	1	5	MODERATE
Escape, Spillage or Leakage of Hazardous Substance	Contamination of soils	3	3	6	HIGH	• Staff induction and training • Refuelling of plant and equipment will occur in impervious bunded areas away from waterway and drainage lines • Spill kits will be kept with site compound areas and onsite during high risk activities • All fuel stores will be appropriately bunded • All bunded areas will be inspected regularly • All plant will be inspected regularly for leaks • All MSDS for will be kept onsite and will be readily accessible.	2	2	4	LOW
	Contamination of Waterways	2	3	5	HIGH		2	1	3	LOW
Leak/spillage of contaminated stormwater.	Contamination of Waterways	3	3	6	HIGH	• Staff induction and training • An EWMS will be created for any works within waterways (including culverts) or that have a high risk of waterway contamination • Spill kits will be kept with site compound areas and onsite during high risk activities • All bunded areas will be inspected regularly • A sediment and erosion control plan would be developed for the work • Sediment retention basins will be used to treat stormwater prior to it leaving site.	2	1	3	LOW

Hazard	Consequence	Consequence	Likelihood	Risk Rating		Mitigation measures	Residual consequence	Residual likelihood	Residual Risk	
Excessive dust/smoke emission	Community complaint	2	4	6	HIGH	• Staff induction and training • Visual surveillance for dust generation will occur at all times. Works must cease when high levels of air-borne dust cannot be controlled • Any activity causing unacceptable visible emissions would cease until adequate control measures can be implemented	2	1	3	LOW
	Inhalation injury	2	2	4	LOW		2	1	3	LOW
Truck/vehicle Collision	Injury or Death	5	2	6	HIGH	• Staff induction and training • A VMP will be produced for all ancillary and work sites • All vehicle operators and delivery drivers will be provided a copy of the VMP prior to arrival onsite. • Emergency services will be contacted as necessary • First Aid kits will be kept in each vehicle and plant as well as in the site compound • A spill kit will be stored in the site compound • Staff will be regularly informed of the site drug policy. Any staff noticeably inhibited will be removed from site.	4	1	5	MODERATE
	Property damage	3	2	5	MODERATE		2	1	3	LOW
	Oil/fuel spillage	3	2	5	MODERATE		2	1	3	LOW

Appendix B – PIRMP Training Register

Date	Trainer Name	Trainee Name	Content Covered
12/4/16	Damien Wall	Greg Blundell	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches
12/4/16	Damien Wall	Matthew Francesconi	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches
27/9/16	Jeremy Wallis	Stuart Light	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches and New Legislation
27/9/16	Jeremy Wallis	Brooke Emmett	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches and New Legislation
27/9/16	Jeremy Wallis	Linton Hewson	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches and New Legislation
27/9/16	Jeremy Wallis	Darren Orvad	POEO ACT 1997, Spill Kit Training, Environmental Emergency Response, Principal and Contractor Responsibilities, fines of breaches and New Legislation

Appendix C – PIRMP Review and Testing Register

Date	Manner of Testing	Tested by	Testing Outcomes

Review Register

Version	Date	Reviewed by	Summary of Changes
1	12/4/16	Damien Wall	Initial revision
2	27/9/17	Jeremy Wallis	Review and updates to roles and responsibilities