



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Prepared for:
Hunter Power Project
Main Works Construction Package

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Plan Approval

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1 INTRODUCTION

This **Pollution Incident Response Management Plan (PIRMP)** describes the requirements and associated responsibilities to effectively prevent, prepare for, respond and recover from any spill and emergency situation associated with the **Hunter Power Project**.

1.1 PURPOSE

This PIRMP has been prepared as a working document that outlines the course of action/s to be followed in the event of a pollution incident event occurring during execution of normal business activities. The PIRMP forms an integral part of the overall HSSE Management Plans. This PIRMP should be read in conjunction with the project Emergency Response Plan, Health and Safety Management Plan and Environmental Management Plan.

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 must also 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.

1.2 PROJECT DESCRIPTION

The Hunter Power Project (Facility) is expected to have a nominal capacity of approximately 660 megawatts (**MW**) (under ISO conditions) and will be generated via two heavy-duty 'F Class' open cycle gas turbines (**OCGT**). The first OCGT unit is expected to be ready for commercial operation by December 2024, followed by the second unit which should be ready for commercial operation by January 2025.

The Facility includes a new 132 kV electrical switchyard. The Facility will connect into the existing 132 kV electricity transmission infrastructure located near the Site and is anticipated to be fully operational by the end of January 2025. The connecting electrical switchyard will eventually be owned and operated by the Network Service Provider (**NSP**) (Ausgrid).

The gas turbines will primarily be fired on natural gas with the use of distillate fuel as a backup. The necessary infrastructure required for the turbines to operate on natural gas fuel, principally a new gas lateral pipeline connecting to the Jemena Gas Network Northern Trunk and a gas compression station, is the subject of a major investment being undertaken by Snowy Hydro Limited (SHL) in parallel to the power station. This gas infrastructure investment facilitates the power station's capability to operate using natural gas.

The turbines are capable of operating on distillate fuel as necessary and this functionality will be incorporated into the Facility. Operation on distillate fuel is considered a backup function in the case that gas supply to the Site is not available, for a short period during the commissioning of the power station and provides the necessary risk management function for the provision of System Restart Services (**SRS**).

The Facility will be fully automated, with operations, control and monitoring able to be monitored and controlled from Snowy Hydro's Control Centre in Cooma, NSW.

1.3 LOCATION AND EXISTING ENVIRONMENT

1.3.1 Location

The Site is located in the small suburb of Loxford in the Hunter Valley region of New South Wales, approximately three km north of the town of Kurri Kurri, approximately 35 km west of Newcastle and 125 km north of Sydney. The Site is the former Hydro Aluminium Kurri Kurri Pty Ltd (**Hydro**) aluminium smelter. Access into the Site will be via the aluminium smelters Hart Road entry.

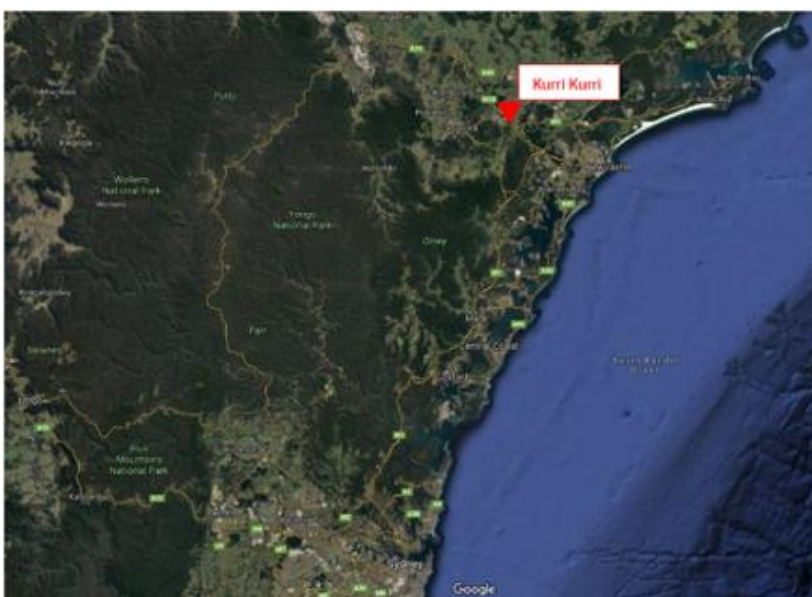
Figure 1: Proposed site location



1.3.2 Prior use and suitability

The smelter was closed in 2014. Since the closure, extensive remediation works have taken place, including removal of all existing structures from the Site, except for a transformer yard and offices. The Hydro land including the site is being remediated for industrial use.

Figure 2: Proposed development location



1.4 SCOPE OF WORK

1.4.1 Description of UGL’s Scope of Works and Responsibilities

As the Main Works Construction (MWC) contractor, UGL’s scope of works and responsibilities are broadly described below, which includes, but is not limited to all Site construction and erection works for the Facility at the Site within the Terminal Points, including:

- Procurement of Balance of Plant (BOP) items within UGL’s scope of works as identified in the DOW (Division of Works) document and as per the final contract documents. The list of all the BOP items within UGL’s scope will be provided by the Lead Designer along with all necessary engineering information, procurement specifications, performance specifications etc.
- Supply of BOP equipment and materials to site, logistics including handling, offloading and proper storage of all Plant and Materials associated with construction of the Facility within the Terminal Points and as covered by the Main Works Contract scope.
- Construction and erection of the Employer’s Design
- Construction and erection of the Power Island equipment under the technical supervision of the Power Island Supplier
- Site assembly, installation and other construction activities as required for the facility within UGL’s scope of works and within the facility’s terminal points
- Pre-commissioning and cold commissioning of the Facility within the Terminal Points
- Provision of experienced labour to support hot commissioning. However, the hot commissioning including the performance testing, reliability runs etc will be carried out by others.
- Full control of the Site including Principal Contractor responsibilities under NSW WH&S Laws.
- Full project management of the construction services in compliance with the relevant Project Approvals and Construction Approvals.
- Mobilisation and demobilisation and provision of all enabling services including utility supplies to facilitate the Facility construction within the Terminal Points and within the agreed scope of works.
- Provision of all labour and supervision, equipment and Plant to construct and erect the Facility construction within the Terminal Points
- Provision of all relevant information related to the Works
- Attaining the relevant Works Approvals for the scope of works within the main works contract.

1.5 ABBREVIATIONS, ACRONYMS & DEFINITIONS

The following table lists the acronyms used in this plan, including their definitions.

Table 1: Abbreviations, Acronyms & Definitions

Term	Definition
AW/ W	Area Warden- Area Wardens are responsible for an entire area of operation or part of a building. They support the CW and give direction to general wardens within their area. Warden – Wardens (if required) are to assist their area warden with evacuation and control of personnel.
BOM	Bureau of Meteorology
BOP	Balance of Plant
CW	Chief Warden
CEMP	Construction Environmental Management Plan

DOW	Division of Works
ECO	Emergency Control Organisation: The team identified to perform prescribed roles in the event of an emergency.
Emergency	The actual or imminent occurrence of an event which endangers the safety and health of persons or which destroys damages or threatens property or endangers or threatens the environment
Emergency Equipment	Equipment used in the event of an Emergency, including, but not limited to, Fire Fighting Equipment such as Fire Extinguishers; Warning Systems such as Fire Alarms, PA systems; 1st Aid Equipment; SDS and Spillage Kits.
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
ERT	Emergency Response Team: For the purpose of this Emergency Response Plan the term ERT refers to all personnel inclusive of CW, FW and first aid staff.
ESC	Emergency Services Coordinator: Is the Senior Officer of the external Emergency Service that is in control of the emergency response effort (ie. Fire or Police)
Evacuation	When all personnel are required to leave any effected area and assemble at a predetermined workplace ie. muster point.
HSMP	Health and Safety Management Plan
Incident	Any event which does or has potential to cause harm or damage to people, property or the environment. Incidents include near misses, which are events that did not cause any harm or damage but had the potential to do so.
ISO	International Organisation for Standardisation
MW	Megawatt
MWC	Main Works Contractor
NEM	National Electricity Market
NSP	National Service Provider
OCGT	Open Cycle Gas Turbine
PFES	Police, Fire and Emergency Services
PIRMP	Pollution Incident Response Management Plan
SDS	Safety Data Sheets (formerly MSDS)
SES	State Emergency Service
SHL	Snowy Hydro Limited (Client)
SRS	System Restart Service
the Project	Hunter Power Project
WH&S	Workplace Health & Safety
UGLMS	UGL Management System

1.6 THE WAY WE OPERATE

‘The Way We Operate’ is an overall process that guides how UGL manages our business to meet client and other stakeholder requirements. It fosters an integrated approach across all operations and functions to deliver outcomes that ensure third party certifications in relation to Australian and International Standards for Safety, Health, Environment and Quality are maintained.

1.7 UGL'S MANAGEMENT SYSTEM

UGL is the Principal Contractor for carrying out all construction works forming part of the works under the contract and the UGL Management System will apply to all workers, subcontractors, and consultants. UGL is authorised to have management or control of those workplaces necessary to discharge its duties as Principal Contractor.

UGL's Management System (UGLMS) will be used for the delivery of the project and will ensure we achieve safe and efficient delivery of our requirements under the Contract, as well as our overall business objectives.

The UGLMS integrates several elements which operationalise 'The Way We Operate' processes to achieve a fully integrated, systematic, planned, and consistent approach to delivering work. These elements are detailed in the table below.

Table 2: Document Type Definitions

Element	Description
Policy	A statement of strategic intent, commitment and includes minimum requirements
Procedure	Describes the steps to be undertaken to complete an activity, the accountable roles and the tools and knowledge to be used
Work Instruction & Safe Work Procedures	Provides detailed instructions on how to conduct a step within a Procedure
Tools	Preformatted documents (forms and templates) used to collect specific data or information for a particular purpose
Knowledge	Reference material to provide context or guidance to a Policy or Procedure
Business Applications	Software tools used to manage our business and operations

2 OBJECTIVE

In order to effectively prevent, prepare, respond to, and recover from spills and emergency incidents, the Project/Site should ensure that potential and actual emergency incidents are managed through:

- Developing, communicating and implementing this PIRMP
- Using proactive risk assessment processes and hazard analysis to identify major threats in the workplace to prevent the occurrence of any emergency event
- Ensuring that responsibilities for the prevention and management of emergency response procedures are well defined and communicated through induction and training programs, and workgroup meetings
- Reviewing previous emergency incidents to ensure that corrective and preventative measures are developed as required
- Maintaining direct and regular communication with local emergency services
- Testing response plans where appropriate in the form of simulated emergencies or practice drills designed to systematically involve all people or processes likely to be mobilised in an emergency event
- Reviewing and maintaining the PIRMP to ensure it remains current and applicable to all hazards and risks.

3 OVERVIEW

The project will prepare for pollution incident scenarios, such as:

- Local emergencies - where the emergency is contained to the workplace. The response may be provided by either the ECO personnel or by further external emergency services involved
- Major spill which requires notification to EPA or clean up by external contractor
- Workplace evacuation - where the emergency is accessed as requiring all workplace personnel to evacuate and muster at predetermined workplaces.

Where an emergency occurs, the ECO will set up a control point or locations, from which it can establish control and coordinate ECO personnel.

In the event of a declared emergency situation, where an evacuation of the site is required, the alarm will be sounded and where all personnel instructed by the Wardens should immediately evacuate the sites and proceed to the nearest evacuation assembly area as marked on the Site Map.

The emergency response requirements in the event of an emergency scenario/situation are as per Appendix 4.

UGL and its contractors will make every reasonable effort to attain full compliance with its duties and obligations under the POEO Act/General Regulation, and the POEPA Act.

4 EMERGENCY PLANNING POSITIONS

Refer to 3200-0663-HPP-PM-PLN-024 Emergency Response Plan *Section 2 Emergency Planning Positions*.

4.1 MINIMISING HARM TO PERSONS ON THE SITE DURING AN INCIDENT OR EMERGENCY

- Refer to 3200-0663-HPP-PM-PLN-024 Emergency Response Plan.
- Refer to 3220-0663-HPP-PM-PLN-004 Health and Safety Management Plan

5 EMERGENCY PREPARATION AND TESTING

5.1 INFORMATION REQUIREMENTS

All personnel employed on the project, including Subcontractors and Customer/Client personnel who are not visitors, should be informed of the following information:

- General requirements of this PIRMP
- Who are the key personnel identified in this PIRMP
- The location of the emergency exits
- The location of the evacuation muster point
- The location of emergency hardware / equipment
- Emergency drawings
- Evacuation requirements.

The above information should form part of the Site/Project Induction.

The Emergency Control Organization (ECO) personnel should undertake relevant training specific to the requirements of the PIRMP.

5.2 HIGH RISK ACTIVITY RESPONSE PLANNING

The Hazard Identification and Risk Management activities for the project or operation will have assessed the risks associated with the activities to be undertaken on site. Control measures for responding to these events, should they occur, are as defined in Specific Emergency Response Scenarios.

5.3 EMERGENCY RESPONSE EXERCISES – TESTING THE PIRMP

Simulation exercises should be carried out at least every 6 months to test the effectiveness of the PIRMP. The aspects of the PIRMP that should be tested and evaluated are as following, but not limited to:

- Response times in initiating the requirements of the PIRMP, eg. Contacting external emergency services; client; wardens initiating and clear their respective areas etc
- Effectiveness of emergency hardware / equipment including its suitability, location and accessibility
- Effectiveness of communications
- Response to injury
- Recovery mechanisms.

The PIRMP may be reviewed at the conclusion of each response exercise and may result in:

- Changes to the PIRMP
- Changes to emergency equipment in respect to suitability, location and accessibility
- Further training for ECO personnel
- Communication to project personnel.

Note: This PIRMP must be reviewed at minimum every 12 months and within 1 month of any pollution incident. The documentation and recording of testing of this PIRMP will be recorded in the register in **Appendix 7**.

5.4 EMERGENCY RESPONSE HARDWARE – LOCATION, ACCESSIBILITY, & SUITABILITY

Refer to 3200-0663-HPP-PM-PLN-024 Emergency Response Plan *Section 3.4 Emergency Response Hardware, Location, Accessibility, Suitability*.

5.5 POLLUTION INCIDENT RESPONSE TRAINING

Training needs should be determined for project personnel based on:

- Training required by Management System and Client procedures (ie. permit system) and regulatory authorities
- Training identified in project risk assessments and /or training needs analysis
- Assigned roles and responsibilities
- The degree of risk associated with the requirements
- Legal requirements.

It is also a requirement that all site personnel have a general understanding of:

- This PIRMP
- OHS Legislation
- Hazard Identification & Risk Assessments

- Safe Work Method Statements and implementation
- Communication and consultation
- Project Safety Procedures
- Incident Reporting & Investigation requirements including Synergy
- Emergency Evacuation and First Response Training.

Competency based training may also be aligned to the individual roles and responsibilities, the degree of risk and may include, but not be limited to, such areas as legal, risk management and emergency response.

Training and development are also available through internal and external mediums and where appropriate, assistance is given to individuals to complete education which provides knowledge and skills that can be applied to promote UGL core business values.

5.6 ECO QUALIFICATIONS AND CERTIFICATION

All ECO personnel should be trained and certified to undertake their functions. The minimum acceptable requirements are as follows:

Table 3: Minimum acceptable training and certification requirements

Role	Minimum requirements
Chief Warden	Chief Wardens must hold current chief warden certification.
Wardens	Wardens should preferably hold a current chief warden certification, but as a minimum must have completed basic warden certificate.
First Aiders	Should hold the first aid certification “Provide first Aid” as a minimum As a minimum a ratio of 1:3 first aiders must hold the senior first aid certification.
Security	Should all preferably hold a Certificate 3 in Security Operations but must as a minimum hold certificate 2 in security operations and hold a current security license.

6 NOTIFICATION AND COMMUNICATION

Following emergency events, two types of communication should be required:

- Immediate incident notification to appropriate internal and external stakeholders
- Response to enquiries - from relatives, the media, local community, and general public.

As a general rule, the CW is responsible for all local notifications (eg, nearby businesses, contractors etc.). **Note:** *All incidents and emergency events must be reported and communicated immediately as per the UGL Incident Management Procedure UGLMS-131-331*

The following site contacts are key individuals who have the responsibility of activating this PIRMP and are authorised to notify relevant authorities as listed under section 148 of the POEO act. The notification procedure will be as per the EPA notification protocol outlined in **Appendix 6**. Local emergency response contact details are also listed below.

Table 4: Key local emergency response contact information

Project details	
Project	Hunter Power Project (HPP)
Customer	Snowy Hydro Limited
Job No	3200-0663
Address	Hart Road (North - Eastern end) Loxford 2326, NSW.
Google Maps Coordinates	32°47'33.20" S
(Entry to UGL Site on Hart Road North)	151°28'48.01" E

Site Project Management – After Hours Contact Details

Emergency Contact Numbers

Role	Name	Email	Mobile
Construction Manager	Sean Riddiford	sean.riddiford@ugllimited.com	0410 311 591
Area Manager/Structural	Glen Flanagan	glen.flanagan@ugllimited.com	0499 451 105
HSE Manager	Bart Robertson	bart.robertson@ugllimited.com	0438 058 354
Senior Environmental Advisor	Cristina Lang	cristina.lang@ugllimited.com	0407 127 349

Fire and Emergency Services

Website	https://www.fire.nsw.gov.au/page.php?id=9210&station=162
Fire and Rescue Station – Kurri Kurri	02 4937 1025
– Weston	02 4937 1071
– Cessnock	02 4991 4150

Emergency Services Contact Details

Service	Contact Number	Address
Ambulance	000 or 112 from mobiles	46 Alexandra Street, Kurri Kurri, NSW 2327
Fire	000 or 112 from mobiles	119 Lang Street, Kurri Kurri, NSW, 2327
Police	000 or 112 from mobiles	121 Lang Street, Kurri Kurri, NSW 2327
Police Station	02 4937 1593	121 Lang Street, Kurri Kurri, NSW 2327
State Emergency Service (SES) Cessnock	132 500 4990 4222	N/A
Hospital – Maitland	02 4087 1000	51 Metford Road Metford NSW 2323
Medical Centre Always Healthcare	Direct - 02 40 135 730 Kurri Kurri – 02 49 393 300 Cessnock - 02 40 135 777	110 Lang St, Kurri Kurri & Suite 1/275 Vincent St, Cessnock
Cessnock City Council	02 4993 4100	62-78 Vincent Street, Cessnock, NSW, 2325

Note: All incidents and emergency events must be reported and communicated immediately as per UGL Incident Management Procedures and EPA notification protocol.

6.1 INTERNAL NOTIFICATIONS

All incidents requiring activation of this PIRMP must be reported to the CW who in turn will provide communications and a report to the Project/Operations Manager and Management Team.

The ECO should activate the ERP appropriate to the level of emergency.

HSE incidents and near miss events must be immediately notified to the relevant levels of supervision or management in person or via phone.

In addition to immediate notification to a line manager or supervisor, the following notifications must occur for the event types detailed below:

Table 5: Event types and required notifications

Event Type	Notification by	Notification to	Timeframe
Actual or Potential Death or Permanent Disability Event Actual, or Potential Environment discharges, environmental pollution or degradation which has high severity impacts on the community and / or environment or may have irreversible detrimental long-term impacts.	Project / Site / Operations	Division GM Site HSE or aligned HSE resources	ASAP
	Division GM Site HSE or aligned HSE resource	Divisional EGM GM HSE Injury Management Team (for UGL employee injuries)	ASAP
	Divisional EGM GM HSE	MD Group GM HSE Legal (if regulatory notifiable or legal privilege needs to be discussed)	<1 Hr
Actual or Potential Lost Time Injury, Medical Treatment Injury, or Restricted work injury. Environmental discharges, environmental pollution or degradation which has moderate severity impacts on the community and / or environment (1 to 3 months) but is fully reversible in the long term	Project / Site / Operations Manager	Division GM Site HSE or aligned resource	< 24 Hrs
	Division GM Site HSE or aligned HSE resource	Divisional EGM GM HSE Injury Management Team (for UGL employee injuries)	< 24Hrs

6.2 COMMUNICATION TOOLS AVAILABLE TO THE PROJECT

The project has identified and will implement communication mechanisms to allow for warnings to those owners and occupiers of premises closest to the site as required. The communications tools engaged on the project include:

- Alarm system
- Portable radio systems
- Mobile phones
- Notice Board
- Project Inductions
- Pre-Starts
- Mock trails
- Toolbox meetings
- Feedback after actual events
- Management Meetings

- External exchange of information with external parties such as fire, ambulance, and police.

6.3 EXTERNAL NOTIFICATIONS

A wide variety of external parties may need to be notified of an emergency. One of the first external parties to be contacted by the CW will be PFES, and others required for assistance with the immediate on-site response effort. Other external parties to be notified in the event of an emergency, may include such groups as:

Government authorities (eg. EPA, etc.)

- Government departments (eg. Local Council, etc.)
- Landowners
- Next of kin
- Specialist authorities (eg. Electricity Regulator, Telstra, etc.)
- Neighbours and community groups
- Subcontractors
- SHL Representatives.

The EPA notification protocol in **Appendix 6** outlines the procedure for external notifications.

6.4 COMMUNICATION WITH NEIGHBOURS AND THE LOCAL COMMUNITY

As the site is not directly located within close proximity to the nearest community and the use /storage of potentially harmful pollutants onsite will be minimal, the mechanisms for a pollution event to impact the surrounding community or industries are negligible. Despite this, the following specific measures will be put into place to communicate emergency response requirements to surrounding dwellings or industry:

- Should an event occur that has the potential to impact the closest dwelling, they will be formally advised by a person of the ECO.
- Whilst the mechanisms for an event to occur that will impact the nearby community are not expected to be in place, should such event occur, the local council will be engaged to assist with communication of the event through means that a typical urgent community announcement would be relayed to the community. This is most likely to occur through text message, social media and announcements through local media.

Prior to works beginning and during the public consultation phase, the local community have been made aware of the intended works to be undertaken on the site including any inherent risk of pollution events through the publicity released Environmental Impact Statement.

6.5 MEDIA RELATIONS

Any condition, emergency or otherwise, requiring liaison with the media should be referred to the Corporate Marketing and Communications department. No personnel have the authority to engage in external media relations without the express consent of marketing and communications.

7 HAZARDS AND RELATIONSHIP WITH SURROUNDING AREAS

Owing to its former use, the site will be located within a highly disturbed industrial landscape, in a relatively isolated location surrounded by generally rural or semi-rural settings. The nearest dwelling to the site is located over one KM to the southeast with the general township over two KM from the site. The site also does not contain any declared outstanding biodiversity values and there are no sensitive sites within or immediately adjacent to the to the site. The

closest surface water sources are two artificial wetlands resulting from clay borrow pits. Given the site and its surrounding area has minimal environmental attributes and is not within proximity to densely populated area's the risk that hazards identified on the site pose to environmental and human wellbeing is minimal. In addition, the site will be operated in accordance with:

- 3200-0663-HPP-PM-PLN-011 Construction Environmental Management plan
- 3220-0663-HPP-PM-PLN-004 Health and Safety Management Plan
- 3200-0663-HPP-PM-PLN-024 Emergency Response Plan

When implemented will contribute to lowering the risk of a pollution incident occurring.

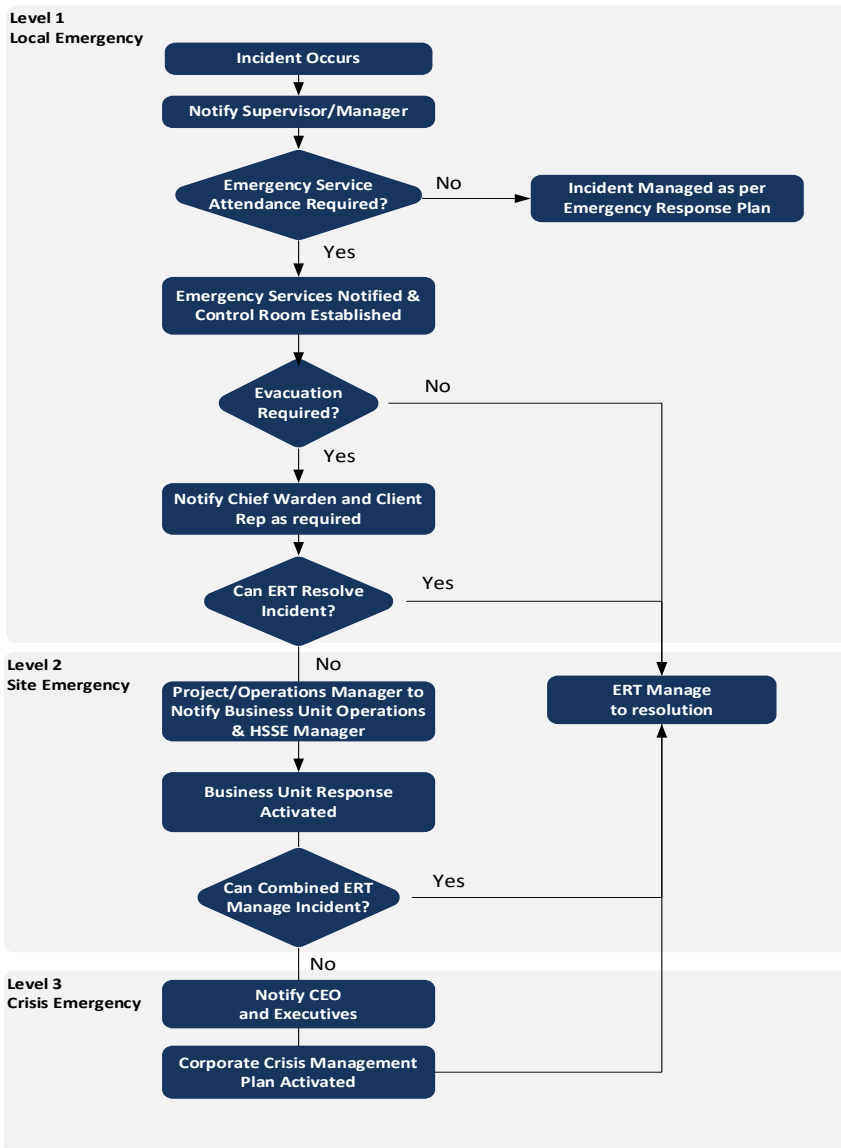
The hazards register in **Appendix 5** highlights the hazards applicable to the site and likelihood of impacts occurring from the relevant hazards. Any occurrences of hazards producing an impact are likely to be confined to within the site and not have any consequences on the surrounding population or environment. There are also no high-risk neighbouring facilities that are susceptible to a possible pollution incident event and as such no additional considerations are required other than those outlined in **Appendix 5**.

8 EMERGENCY CATEGORIES

Refer to 3200-0663-HPP-PM-PLN-024_0 - Emergency Response Plan section 5 *Emergency Categories*

8.1 INCIDENT ESCALATION WORKFLOW

Figure 3: Incident escalation workflow



Note: All incident escalations to initiate through Level 1 processes and follow through Level 2 to Level 3 as required based on the severity of the event.

9 TERMINATION OF EMERGENCY

9.1 RETURN OF CONTROL TO THE CW FROM THE PFES

Where an Emergency is of such proportions that any Emergency Services are involved, the formal response control will be assumed by a senior member of the Emergency Services. When the Emergency Services Controller decides that the situation is fully under control and no further danger exists, they will formally declare the emergency over, and advise the CW. The CW will in turn notify (by suitable means) other parties involved of the termination, and resumption of normal operational activities.

9.2 INVESTIGATION AND REPORTING

All incidents requiring an emergency response will undergo investigation. All incident investigation and reporting will be executed as per UGL Incident Management Procedures.

10 RECOVERY AND RESTORATION

The responsibility for planning and implementing recovery and restoration action rests with the CW in consultation with first aid and HSSE personnel, activities may include:

- Rehabilitation of staff
- Repair of damaged facilities
- Environmental remediation
- Replenishment of emergency facilities eg. fire extinguishers, first aid kits, control room equipment and documents etc
- Actions to restore image and business operations.

10.1 DEBRIEF PROCEDURES

Formal debriefings should be conducted for all incidents activating this PIRMP. It is the responsibility of the Controlling CFW to perform this task.

The initial debrief on the actual incident should occur within 48 hours or as otherwise agreed. Weekly debriefs should be held until the recovery and restoration is over.

- Confirm the Time Log/ Sequence of Events to ensure accuracy as to what occurred
- Identify those aspects of the emergency response where improvements, and lessons learned can be made to systems and procedures, and thereby improve overall business performance
- Once improvements have been identified responsibilities for completing the tasks are to be assigned.
- Emergency and Debrief records are to be filed in the office document management system.

Legal Advice

Where required in accordance with the incident reporting process, UGL Legal departments should be notified by the UGL Operations Manager or UGL Safety Manager in order to provide advice in the matter as necessary.

Media

All statements to the media concerning any emergency at any UGL workplace should be made only after consultation with the client and UGL Management.

The Media will be treated courteously but should not be allowed free access to the site. All media enquiries and/or releases should be referred to the client and the UGL Project Manager, who will refer them to the appropriate media representative.

11 CLIENT REQUIREMENTS

All ECO and other operational personnel must attend and participate in any client or site-specific drills and responses as determined by the client. The client should maintain the responsibility to communicate and schedule their individual response exercises and drills.

11.1 SHARED AREAS – COORDINATION WITH ADJACENT WORK AREAS

UGL should liaise and communicate with adjacent contractors to ensure in the event of an emergency where shared areas on site exist between two controlled sites that the following is in place:

- Regular contractor co-ordination meetings involving emergency planning committee ie. notification of upcoming site drills and changes to aligned processes.

- Overarching site emergency evacuation and muster points (for common areas communicated via inductions and site signage)
- Overarching site emergency contact details (exist in common areas – main gate access)
- Site specific contractor emergency management plans including agreed/aligned details.
- Emergency Notification Processes include notification to nearby work groups (as per Section 6).

11.2 RECORDS

All records of emergency response exercises, including notes, recommendations and debrief meetings should be stored within the site HSE filing structure. All records should be maintained and archived as per the site quality management plan.

12 INVENTORY AND QUANTITY OF POTENTIAL POLLUTANTS

Table 6: UGL inventory of pollutants contained onsite

Substance	Maximum Quantity onsite without further assessment or approvals
Diesel	10,000L
PVC Priming Fluid	20 L
Unleaded petrol	1,000 L
PVC Pipe Cement	20 L
Gold Galvanizing Paint	5 L
Marking Paint	5 L
Jointing Compound	5 KG
Septic Waste	25,000L
Cleaning requirements	50 L
Flammable gases	200L
Pressurised gases	1000L
Oxidising agent	1000L
Sodium Hydroxide Solution	250L

All chemicals are stored onsite in appropriate containers and within bund areas and records are kept in the site SDS register.

The SDS for all chemicals used, the risk assessment of substances and the SDS register can be found onsite. These documents are also available on the UGL server. This PIRMP is a live document, and the above inventory will be updated as required. Likewise, Map 1 will be updated to include the location of all pollutants onsite when storage locations are known.

13 SAFETY EQUIPMENT AND INFRASTRUCTURE

PPE and safety equipment for all persons undertaking work or other activities onsite must be implemented to the fullest extent specified in their Safe Work Method Statements (SWMS).

Equipment and infrastructure to minimise the risk to human health and the environment and to contain or control the impacts of a pollution incident are identified in the CEMP, HSMP and SWMS.

Equipment utilised to contain and control a pollution incident is as follows:

- Fully stocked spill kits available at both the WRP and WTP sites
- Chemical bunds
- Flammable cabinet

- Waste storage facilities
- Pedestrian barriers utilised to cut off areas from public egress as required.
- Fire extinguishes
- Sediment fencing/coir logs
- PVC water fence boom.

Appendix 1: Responsibilities

Position	Responsibilities
Project/Operations Manager	<ul style="list-style-type: none"> • Ensure that the PIRMP Plan is developed, review and approved • Ensure that the Hazard Identification and Risk Management activities include emergency situations • Ensure that the Emergency Control Organisation is established and maintains the requirements associated with this plan
HSSE Professional/Environmental Manager	<ul style="list-style-type: none"> • Emergency Planning Committee member. • Review procedures and organize test evacuations. • Report emergencies as per Incident Management Procedure • Ensure that Emergency Equipment inspections are completed as per this plan and the HSSE Activity Planner. • Coordinate Emergency Team meetings. • Ensure Site Emergency Procedure is up to date and communicated adequately to all site personnel. • Plan and facilitate Emergency Evacuation Trials. • Plan and arrange training for Emergency Wardens as required. • Liaise with Chief Emergency Warden and assist as required. • Provide advice to the Emergency Committee as Required • Monitor changes in the work environment which may require the PIRMP to be updated

Appendix 2: Emergency Control Organisation Responsibilities

Refer to 3200-0663-HPP-PM-PLN-024 Emergency Response Plan

Appendix 3: Emergency Response Hardware: Location, Suitability, Accessibility

Emergency/Hazard/Injury	Detail	Response Equipment and Provisions	Location	Suitability	Accessibility
Fire <ul style="list-style-type: none"> Burns Damage to plant and equipment, Buildings or environment 	Fire contained in part of site that could damage plant or equipment. Potential for explosion.	<ul style="list-style-type: none"> Firefighting equipment First aid kits, Automated External Defibrillator (AED) Occupational trained First Aid personnel Training in the selection and use of fire extinguishers / blanket. NSW Emergency services. 	Hardware at immediate work area. Emergency services off site Kurri Kurri, Cessnock and New Maitland.	Yes	Yes
Hazardous Spills or Contaminated Material (Use handling, transport, storage)- <ul style="list-style-type: none"> burns asphyxiation Chemical / Hydrocarbon release Release PCBs Explosion 	Loss of containment Exposure to substances Uncontrolled release to ground/water/air	<ul style="list-style-type: none"> Fire extinguishers First aid kits Eye Wash Station Oil spill equipment SDS Environmental Spill kits Spill kit training. Water/air quality meter 	At immediate work site	Yes	Yes
Medical Emergency - that requires Medical Emergency Services	Including but not limited to heart attack, major cuts, crush, burns, fractures, seizure, snake bite, fauna attack, illness.	<ul style="list-style-type: none"> First aid kits AED Re to First Aid Risk Assessment for details NSW Ambulance service Kurri Kurri and Braxton or Cessnock. Kurri Kurri and Maitland Hospitals both having Emergency departments. Approved Fauna catcher. 	All LVs with basic First Aid kits. Trauma Kit AED and first Aid kits are kept in the nominated First Aid room.	Yes	Yes
Storm/severe weather event	Light structures being blown around, tree limbs	<ul style="list-style-type: none"> First aid kits 	First Aid kits onsite.	Yes	Yes

	fallen, power lines down, water/sediment runoff	<ul style="list-style-type: none"> • NSW Emergency services. • Erosion and sediment controls (sediment fence/choir logs) 	Emergency services Kurri Kurri, Cessnock and Maitland.		
Gas leak, explosion, fire, weather - that requires an emergency evacuation	Emergency Evacuation				

Appendix 4: Specific Emergency Response Scenarios and Required Actions

Item	Potential Incident	Response
1	Environmental Incidents	<p>Environmental Incidents on the project can include spills/escape of contaminated/polluted water, Odours and dust, Flooding of Site, Plant or Vehicle Malfunction, Flora or Fauna kills and Release of Waste. In the event of an environmental incident, the RM should assess the extent of which and where deemed necessary the appropriate actions should be put in place, including but limited to:</p> <ul style="list-style-type: none"> • Notifying UGL and external emergency authorities, if necessary • Evacuation of area • Alerting 1st Aiders • Isolation of plant and/or equipment by licensed electrician if involving live power. <p>Spills / escape of polluted water (including acidified water):</p> <ul style="list-style-type: none"> • Contain the spill - ensure that no further escape occurs, especially off-site • Determine whether clean-up is likely to be required - recover spilt material • The Environmental Officer, in consultation with the UGL determines the most suitable process for clean-up & disposal of contaminated materials • Determine how the escape has occurred. Stop using any malfunctioning plant, tanks and/or bunds until they are repaired • Odours and dust • Apply odour / dust suppression agents (including water mists, soil, chemicals) • Consider carefully which option to select in light of the scale & type of problem • The Environmental Officer, in consultation with the UGL determines the most suitable corrective actions • Flooding of the site • All electrical equipment will be shut off and isolated at the source • If the flooding appears to be a water main leak/rupture, notify Sydney Water • The Environmental Officer and UGL will determine the course of action for clean-up in consultation with the council/authorities. <p>Plant/vehicle malfunction or breakdown:</p> <ul style="list-style-type: none"> • Contain any leaks or liquid spills • Determine if the plant can be safely moved without causing any environmental damage

		<ul style="list-style-type: none"> • Notify the relevant contractor or manufacturer for repair. <p>Flora / Fauna Kills:</p> <ul style="list-style-type: none"> • Cease activity causing flora / fauna injury or disturbance • The method selected must be carefully considered in light of the scale & nature of the problem • The SEO, in consultation with the UGL determines the most suitable corrective actions. <p>Notify NPWS, DECC if an endangered / threatened flora species is affected or killed. If the species is injured, notify WIRES after consulting the NPWS.</p> <p>Release of Waste:</p> <ul style="list-style-type: none"> • Cease activity causing the release of wastes off-site • The method selected must be carefully considered in light of the scale & type of problem • The SEO, in consultation with the PM, determines the most suitable process for clean-up.
2	Hazardous Spills or Contaminated Material / pollution incident	<p>Safety Data Sheets</p> <p>Where there are hazardous materials used on the project copies of MSDS should be held and maintained by UGL and employees should be aware of the MSDS information and locations of spill kits. UGL ensure a list of MSDS are maintained. UGL should review and update the list in case of any changes to quantity stored or expiry of the MSDS. If UGL determines that the emergency situation could threaten human health or the environment, UGL should:</p> <ul style="list-style-type: none"> • Determine if evacuation of local areas is necessary and if so, immediately notify appropriate local authorities • Immediately notify the relevant government regulatory organisation • Controlling a Hazardous Material Emergency. <p>During an emergency, UGL should take all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur, or spread to other hazardous materials. These measures should include:</p> <ul style="list-style-type: none"> • Stopping processes and operations • Collecting and containing released materials • Removing or isolating hazardous material containers • If the work area ceases operation in responses to a hazardous material leak, fire or explosion, UGL should monitor the work area for: <ul style="list-style-type: none"> • Leaks • Pressure build-up • Gas generation

		<ul style="list-style-type: none"> • Ruptures in valves, pipes, or other equipment. <p>After The Emergency</p> <p>Immediately after an emergency, UGL should provide for the treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other material that results from an emergency in the premises. UGL should insure that, in the affected area(s) of the workplace:</p> <ul style="list-style-type: none"> • No waste that may be incompatible with the released material is treated, stored, or disposed of until clean-up procedures are completed • All emergency equipment is checked and available for its intended use before operations are resumed • UGL should notify the regulatory body and appropriate State and local authorities before operations are resumed in the affected areas • Procedures for proper clean-up of minor chemical spills should be contained in individual MSDS sheets. Minor spills should be cleaned up according to these established procedures.
3	Chemical Spillage	<ul style="list-style-type: none"> • Stop processes and operations • Identify the released material and review associated SDS • Assess the extent of the spill and potential hazards to human health or the environment that may result from a chemical release. If safe to do so, contain the chemical spill using emergency spill kits and using appropriate PPE • Determine level of escalation requirements and seek advice from the HSSE coordinator and Client; Consult the Environmental Management Plan if required • Coordinate ongoing activities to prevent further impacts • Assess and arrange for resources as appropriate • In event of spillage of hydrocarbons ensure sources of ignition are removed or shut down • Assist with coordination of remedial activities • Advise appropriate persons of incident status, extent of property/environmental damage and initiate incident reporting/investigation procedure • Ensure spill kits are refurbished immediately after use • Ensure any contaminated material (eg. spill kit material, soil, etc) are disposed appropriately.
4	Chemical / Gas Leak	<ul style="list-style-type: none"> • Coordinate evacuation of all personnel and members of the public to a safe area • Ascertain the extent of any injuries/damage and take positive safe action to prevent escalation • Determine level of escalation requirements if required • Request further resources as may be required (eg. external emergency services) • Coordinate fire prevention/control strategies until arrival of emergency services (eg. shut down machinery if safe to do so) • Coordinate first aid treatment until arrival of the ambulance/medical and/or paramedic assistance.

5 Small Spill procedure

Clean-up of Small Spills/Leaks			
Description:	<p>This procedure provides guidance for clean-up of small chemical spills and will establish minimum expected requirements and performance of employees when responding to spills.</p> <p>A small 'Spill/ Leak' is defined as an unintentional release of a chemical/fuel/oil, which does not leave the site. It includes spillages to soil and hard surfaces. This procedure is only to be followed for spills where:</p> <ul style="list-style-type: none"> - the identity of the spilled material is known - sufficient resources (personnel & equipment) are on-site to contain and clean-up the spilled material 		
Risks/issues	Small chemical/fuels/oils spills may cause harm to worker's health and the environment if not managed and cleaned up appropriately.		
Prepared by:	Stefan Nightingale	Date revised:	13 December 2019
Steps to Follow			
1	Assess the situation		
	Before clean-up assess the potential risk to your safety, the safety of those working around you, and the environment. Depending on the type and quantity of material spilled, UGL will assess if can be dealt with by (an) individual(s) or if you need external assistance (i.e. Fire brigade – refer to emergency contact list if needed). Advise or alert the other personnel so they can assist you if necessary. STOP the source of the spill if it is SAFE to do so.		
2	Secure		
	Make the site safe for all personnel and the public. Monitor and control access where the spill occurs (i.e. tape, barrier) to prevent personnel from being contaminated and the contamination from being spread by traffic movement.		
3	PPE		
	Prior to any clean-up, consult the relevant SDS for the chemical/fuel/oil to determine the required personal protective equipment (PPE). No clean-up work should occur without the correct PPE.		
4	Contain		
	Contain the spill using the spill response equipment (in the spill kit) such as spill booms, drain covers or bunding.		
5	Absorb		
	Once the liquid is contained, you need to convert it to a solid by absorption. Use the appropriate absorbing pads or absorbent (according to the type of material spilled) to soak up the spill by placing them over the liquid. Remove the saturated pads and replace as necessary. On porous surfaces, sprinkle loose absorbent over the spill and broom through until surface appears dry.		
6	Dispose		
	Place the spent absorbent in the appropriate disposal bags and seal them. The contaminated material placed in the disposal bags must not contain free liquids to be disposed in a general waste bin. If free liquids are observed, additional absorbent materials should be used. Refer to the SDS for appropriate clean-up. Correctly dispose of contaminants off site using a licensed contaminated waste disposal contractor or place in trade waste, if applicable.		
7	Report		
	Notified the Site HSSE Advisor and Project Manager. Document the incident using the Incident Report form.		
8	Restock		
	Order and replace used up PPE and absorption materials in the spill kit.		

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Appendix 5: Hazard Register

Hazard	Impact/consequence	Likelihood of occurrence	Events that could increase likelihood	Pre-emptive action	Safety equipment required to reduce risk to human health	Likelihood of occurrence with pre-emptive action and use of safety equipment
Dust generation	<p>Air pollution</p> <p>Annoyance to workers and nearby residents, breathing difficulties</p> <p>Visible dust emissions leaving site impacting local traffic</p>	Possible	<p>Natural event (wind)</p> <p>Increased movement of plant</p>	<p>The area of disturbed land will be kept to a minimum. Existing vegetated areas will be kept intact for as long as Possible prior to clearing.</p> <p>Suppress dust with water or dust suppressant.</p> <p>Monitor weather conditions</p> <p>Communication means in place to receive feedback from member of the public</p>	<p>PPE</p> <p>Air quality monitoring as required</p>	Unlikely
Consumption of fuels	<p>Greenhouse gas emissions</p> <p>Smoky exhaust emissions from plant and machinery causing air pollution and complaints</p>	Possible	<p>Use of equipment that is not serviced or been operated within specifications</p> <p>Natural event (wind)</p>	<p>Machine and equipment well maintained.</p> <p>Machinery not left idling if not in use.</p> <p>Monitor weather conditions.</p> <p>Communication means in place to receive feedback from member of the public</p>	<p>PPE</p> <p>Air quality monitoring as required</p>	Unlikely
Accidental Spills/Leaks e.g.: Fuels, oil and chemicals	<p>Land/ Water/ Groundwater/ air pollution</p> <p>Harmful to local fauna and flora</p>	Possible	<p>Use of equipment that is not serviced</p> <p>Refuelling in a non-pre-approved area</p>	<p>Spill kits on site.</p> <p>Drip trays/appropriate bunding and storage of hazardous substances</p> <p>Use of appropriately maintained equipment</p>	<p>PPE</p> <p>Correct storage of hazardous substances</p>	Unlikely

	Inhalation of toxic fumes/burns if contact with skin					
Run off of sediment/ site materials	Pollution of surface water	possible	Weather	Appropriate erosion sediment controls in place Minimise exposed ground and stabilise exposed ground where required Monitor weather conditions		Unlikely
Storage/disposal of waste and onsite sewage	Pollution from waste runoff Overflow of onsite septic systems	Unlikely		Appropriate disposal facilities and waste segregation Waste contractor to undertake regular removal of waste and septic systems	As per contractor SWMS	Unlikely
Material transfer points (transfer of potential pollutants)	Spill/ leak of pollutants being transferred through site Transfer of hazardous substances through 3 rd party actions (contamination on work boots, wind, runoff)	Possible	Weather New persons on site Not following management plans and procedures	Management plans and procedures implemented (UGL and Jacobs CEMP)	Washdown of boots and plant between sites Cover all loads Don't move material during weather events	Unlikely

Appendix 6: Protocol for Reporting of Pollution Events

Recent changes to Part 5.7 of the **Protection of the Environment Operations Act 1997 (POEO Act)** specify new requirements relating to the notification of pollution incidents.

The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- 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 Lord Howe Island Board for Lord Howe Island, or the Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council)
- The EPA, if it is not the ARA – phone Environment Line on 131 555
- NSW Health (via the public health unit) on 02 4924 6477
- Safework NSW (formerly WorkCover) – phone 13 10 50
- The local authority if this is not the ARA
- Fire and Rescue NSW – phone 1300 729 579 Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again
- Department of Planning, Industry and Environment on 4904 2700.

Appendix 7: PIRMP Testing and Update Details

Date Tested	Tested By (ensure include all persons involved in testing)	Details Of Test	Finding Of Test	Next Schedule Test
22 May 2023	<p>Cristina Lang- Senior Environmental Advisor</p> <p>Danny Dewberry - Health, Safety and Environment Manager</p> <p>Mark Nickalls – Health, Safety and Environment Advisor</p>	<p>Desktop review – Hydrocarbon spill</p> <p>On 22 May 2023, approximately 2 litres of hydraulic oil leaked from the concrete pump hose attached to the piling rig equipment. The Site Supervisor immediately notified Senior Environmental Advisor.</p> <p>PPE worn were gloves and protective goggles.</p> <p>The hose leakage was suppressed, and the spill stopped by the equipment operators.</p> <p>The hydraulic oil spill was contained with 1 x 3m and 1 X 1.2m absorbent socks, starting from the outside area circling to the inside part of the stain; The excess of oil was removed with absorbent pads and SpillSmart FloorSweep.</p> <p>A superficial layer of soil was shovelled to remove the remaining oil.</p> <p>The contaminated material was disposed of into sealed plastic bags and placed in the</p>	<p>The response from the work crew was immediate in containing the spill; the emergency equipment was located at the work front, where the spill occurred, and it was adequately stocked to contain and clean up the spill.</p>	<p>Before 22 May 2024</p>

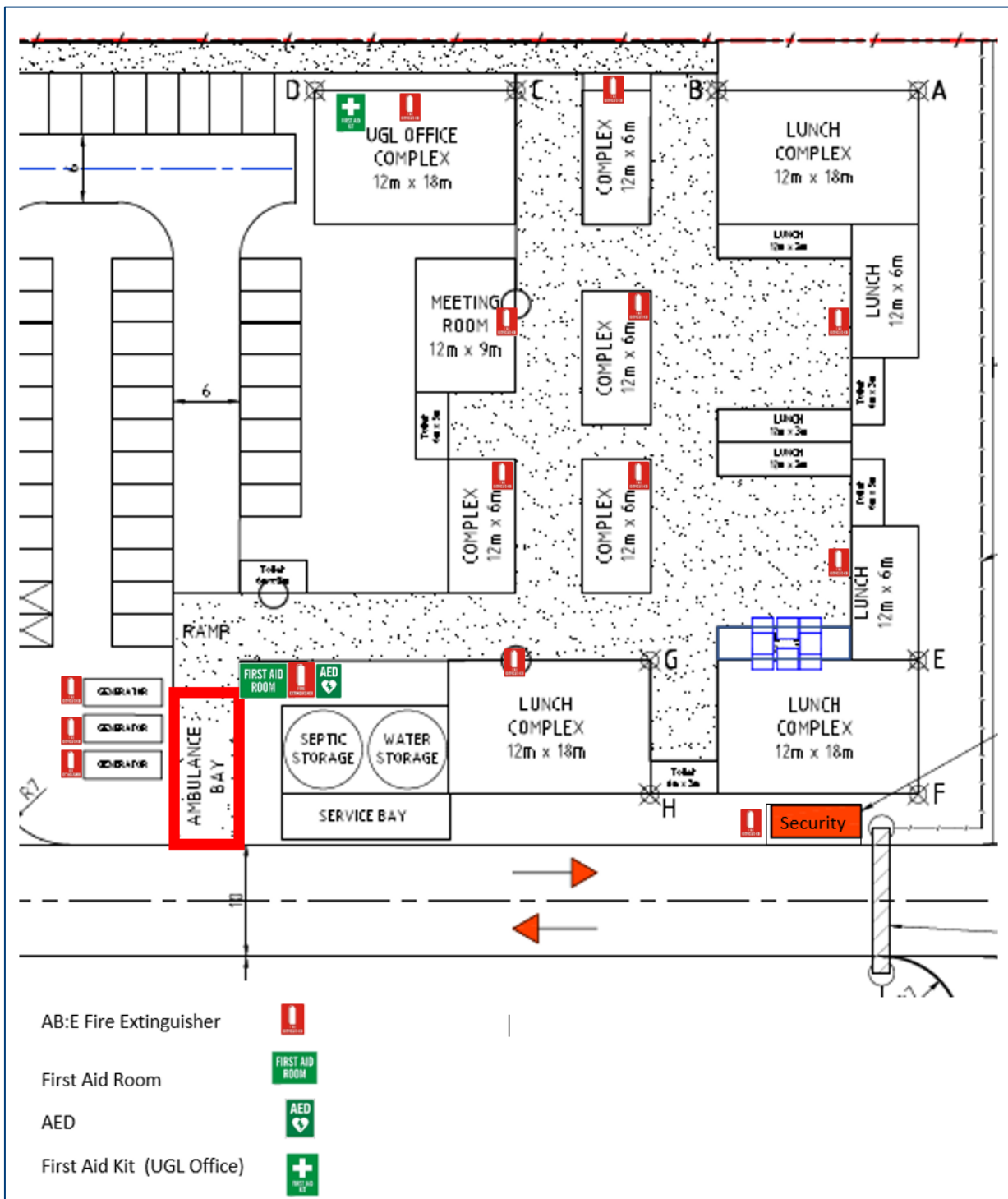
		<p>contaminated material waste container.</p> <p>The event was internally reported to Chief Warden on shift</p> <p>The spill kit was fully restocked.</p> <p>The event was reported into Synergy (UGL reporting platform) under Severity 5 category – Incident record required.</p>		
13/05/2024	<p>Cristina Lang- Senior Environmental Advisor</p> <p>Bart Robertson - Health, Safety and Environment Manager</p> <p>Kristy Barker – Senior Health, Safety and Environment Advisor</p>	<p>Desktop review:</p> <p>Effluent spill</p> <p>On 13/05/2024 an overflow of sewage was noted in the macerator area.</p> <p>The contaminated area was isolated with absorbent socks. The sewage waste removal services was contacted to pump out the excess of effluent. A plumber was called onsite to unblock the macerator.</p> <p>All toilet facilities were inoperative therefore employees were sent home for the rest of the shift. Once the excess of effluent was removed, lime was spread in the area, remaining in situ for 24 hours, allowing it to neutralise odours and kill bacteria from the sewage spill.</p>	<p>The timeframe for response amongst reporting the incident and actions undertaken was considered adequate.</p> <p>There were sufficient amounts of lime stored onsite to treat the effluent spill immediately.</p> <p>Engaging an Occupational Hygienist was a good initiative to ensure all actions and measures undertaken to contain and treat the spill were satisfactory.</p>	Before 13 May 2024

		<p>After 24 hours, the area was cleaned up and residual waste was disposed of accordingly.</p> <p>During the clean-up and removal of sewage process, waterproof rubber boots were utilised in addition to full PPE including gloves and protective goggles.</p> <p>An occupational hygienist was engaged to assess the adequacy of the controls implemented in the incident.</p> <p>The event was reported into Synergy (UGL reporting platform) under Severity 4 category – Incident record required.</p>		
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Date Update occurred	Reason For Update	Details Of Update	Date Update Was Reviewed	Date Update Was Approved
24 May 2023	Details/personnel have changed, project dates updated	Project Management details, Project Description dates, Site Project Management Emergency contact details, Site Project Management Emergency Services contact details, inventory and quantity of potential pollutants	24 May 2023	24 May 2023
13/05/2024	Project updates/annual review	Emergency contact numbers Details/personnel have changed Update PIRMP testing details	13/05/2024	22/05/2024

		Update inventory and quantity of potential pollutants list		

Appendix 8: Map 1 – Site Emergency Equipment and Location of Potential Pollutants



Appendix 9: Map 2 – Evacuation Plan

