

Pollution Incident Response Procedure

All incidents that cause or threaten material or environmental harm will trigger the PIRMP and must be reported to the EPA

Important:

This procedure must be read and understood by all staff at the site.

PIRMP Drill was undertaken on the 19th December 2023

The Drill was attended by [REDACTED].

Scenario: ‘Leak, spill or escape of any substance in a manner that harms or is likely to harm the environment.’

Significant spill event in and around disconnected drain.

For the scenario and excavator has collision with a generator and 300L of diesel has spilled onto the ground as well as some entering into no active drainage.

The steps that were undertaken:

1. Deployment of spill kit material around the source
2. Check all nearby drains are blocked/ or isolated and spill is contained.
3. Organize cleanup and disposal.
 - o Liquid waste removal (vacuum truck)
4. Remove and dispose of spill kit material and all impacted soil material.
5. Seek professional advice to assess any further impacts of the incident.
 - o Soil testing
 - o Infrastructure
6. Restock spill kits.
7. Update PIRMP.

Scenario was reported to EPA Pollution Line and the following reference number for the drill have been provided # 01155458.

Relevant Authority	Name/Location/Purpose	Contact Number
Emergency Services	NSW Ambulance NSW Police Fire and Rescue NSW	000 Only ring 000 if the incident presents an immediate threat to human health or property and response by an emergency services agency is warranted. If the incident does not require an initial combat agency, or once the 000 call has been made, notify as listed below.
NSW Ambulance	Parramatta	(02) 9320 7777
NSW Police	Parramatta	(02) 9633 0799
Fire and Rescue NSW	Parramatta Fire Station Wentworthville Fire Station	(02) 9493 1027 (02) 9493 1057
EPA Pollution Line	Notify actual or potential material harm to the environment	131 555
NSW Health		(02) 9391 9000
SafeWork NSW	Incident notification (including after hours), information, advice and assistance	13 10 50
City of Parramatta Council	Where any council-owned or governed asset is affected	1300 617 058 or 02 9806 5050

Relevant Authority	Name/Location/Purpose	Contact Number
Cumberland City Council	Where any council-owned or governed asset is affected	02 8757 9000
Department of Planning, Industry and Environment	TfNSW Senior Manager Environment to contact via the Major Projects Portal	Major Projects Portal
Sydney Water (Water and Sewerage)		13 20 90
Jemena (Gas)		131 909
Endeavour Energy (Electricity)		131 003

Table 1: Authority contacts that requiring notification during a pollution incident

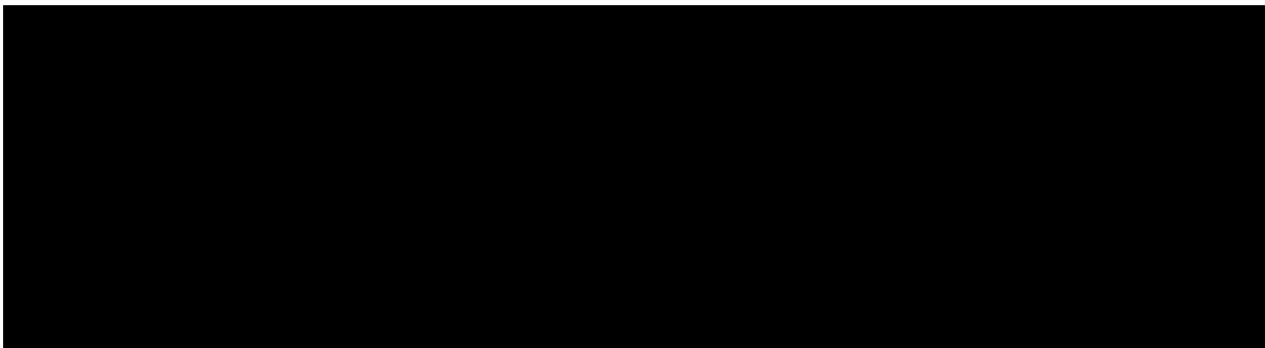


Table 2 - Contact details for persons and organisations relevant to pollution incident and emergency response

Environmental Risk Identification								Risk analysis and evaluation using existing standard controls and assumptions			Risk Management
Risk Ref #	Environmental Aspect*	Impact **	Impact Category	Site Specific Risk Description ***	Risk category	Project-Specific Location(s)	Existing Standard Controls and Assumptions	Consequence	Likelihood	Rating	Additional Project or Site-Specific Management Actions
1.1	Project vehicle movements in the public domain - all activities	Traffic congestion due to high volume of construction vehicles around the TPS and Stop construction zones and SaMF	Traffic, Transport and Access	Complaints received on community hotline	Reputation - Community	Haulage routes to SAMF and construction sites Construction zones at the TPS and Stop construction areas BOCC	Traffic, Transport and Access Management Sub Plan - Road deliveries would be scheduled to avoid peak road congestion periods Traffic Management/Control Plan developed by Traffic team detailing haulage routes and delivery timeframes. Road closures and traffic changes will be undertaken during off peak times where possible	Minor	Likely	Low	The structural elements of the TPS and Stops will be prefabricated off site and lifted into place.
1.2	Project vehicle movements in the public domain - all activities	Noise emissions from construction vehicles impacting sensitive receivers	Noise and Vibration	Complaints received on community hotline	Reputation - Community	Haulage routes to SAMF site Construction zones at the TPS and Stop construction areas BOCC	Traffic, Transport and Access Management Sub Plan - Road deliveries would be scheduled to avoid key sensitive periods as much as is practicable. The Noise and Vibration Management Plan (NVMS) details the protocols and assessment requirements for working outside the approved construction hours specified in CoA E21 and E22.	Minor	Likely	Low	The Project will implement the DPIE approved Parramatta Light Rail – Stage 1 Out-of-Hours Work Protocol (Rev 8.3 4 November 2019).
2.1	Light emissions during night-time activities - all activities	Disturbance of nearby receivers	Community	Complaints received on community hotline	Reputation - Community	Residents adjacent to night works during construction for TPS and Stop construction areas and Back Up Control Centre	The Project will implement the DPIE approved Parramatta Light Rail – Stage 1 Out-of-Hours Work Protocol (Rev 8.3 4 November 2019) which includes light spill control provisions. OOHW inspections will review and address identified light spill issues.	Minor	Likely	Low	None
3.1	Greenhouse gas emissions - all activities	Contribution to climate change	Community	Not applicable - due to its relatively small scale and temporary nature, the construction works would have a minor influence on climate change through greenhouse gas emissions.	Environment - Environment Effects / Cultural Heritage	Whole alignment	Delivery Phase Sustainability Management Plan includes greenhouse gas reduction strategies to be implemented during construction.	Minor	Very Likely	Low	None
4.1	Waste production - all activities	Excessive waste production and landfill reliance	Waste and Hazardous Material	Cost to project for disposal of waste.	Financial - Project / Program / TPD Budgets	SAMF site TPS and Stop construction zones	Waste and Resources Management Sub Plan - The following strategies would be employed to minimise impacts: Apply waste management hierarchy, classification and segregation of waste to minimise landfill quantities, use licenced waste facilities and track waste movements, training of staff to minimise landfill waste volumes and manage waste appropriately.	Minor	Likely	Low	None

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5.1	Resource use - all activities	Excessive resource use	Systems and Documentation	Project cost, resource use and waste volumes	Financial - Project / Program / TPD Budgets	SAMF site TPS and Stop construction zones BOCC	Waste and Resources Management Sub Plan - The following strategies would be employed to minimise impacts: Where practicable, surplus existing materials will be identified and utilised where fit for purpose, products and materials containing recycled content or packaging used as a preference to non-recycled materials, consideration of embodied carbon of construction materials , preference for locally sourced goods and services (Procurement Plan), efficient use of energy and water (DPSMP), training of staff in best practice, monitoring of resource use (DPSMP).	Minor	Likely	Low	None
6.1	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	Dust emissions reducing air quality for offsite receivers	Air and Dust	Complaints received on community hotline Complaints received and investigation from regulators resulting in potential stop work	Reputation - Community	SAMF site TPS and Stop construction zones BOCC	Air Quality Management Sub Plan - The following strategies would be employed to minimise impacts: perimeter screening, stabilisation of unsealed ground, modification of activities according to wind speed, dust suppression techniques to work areas and stockpiles, covering of haul loads, visual dust monitoring, training, regular review of mitigation effectiveness.	Minor	Likely	Low	None
6.2	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	High noise and vibration levels impacting offsite receivers	Noise and Vibration	Complaints received on community hotline Complaints received and investigation from regulators resulting in potential stop work Breach Project EPL	Reputation - Community	SAMF site TPS and Stop construction zones BOCC	Construction Noise and Vibration Management Sub Plan - The following strategies would be employed to minimise impacts: noise emission monitoring at nearby receivers, application of noise abatement strategies if required, high noise tasks to be scheduled to minimise disruptions to receivers, respite periods to be applied as required, notification of nearby receivers of high noise activities, training, regular review of mitigation effectiveness.	Minor	Likely	Low	The Project will implement the DPIE approved Parramatta Light Rail – Stage 1 Out-of-Hours Work Protocol (Rev 8.3 4 November 2019).

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6.3	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	Sediments, wastes and contaminants impacting land	Land Contamination	Breach of POEO Act Complaints by regulator (EPA) or council resulting in stop work notice	Environment - Environment Effects / Cultural Heritage	SAMF site TPS and Stop construction zones BOCC	Soil and Water Management Sub Plan and Construction Waste and Resources Management Sub Plan - The following strategies would be employed to minimise impacts: Maintenance to ensure effective functioning of the site boundary erosion sediment control fence and water treatment plant, progressive erosion and sediment controls around work areas, good site housekeeping, location of stockpiles, wastes and contaminants outside of drainage lines and flood-prone areas, unexpected contamination finds procedure, environmental incident and emergency response procedure to be followed in case of contaminant spills, availability of spill kits, appropriate storage of contaminants and wastes to prevent escape, training, regular review of mitigation effectiveness.	Moderate	Unlikely	Low	Environmental Control Maps will be prepared for each construction zone and will incorporate relevant sensitive areas, mitigation measures and controls, including those from relevant management sub plans. ECMs are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.
6.4	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	Sediments, wastes and contaminants impacting water quality	Water Pollution	Breach of POEO Act Complaints by regulator (EPA) or council resulting in stop work notice The Project EPL	Environment - Environment Effects / Cultural Heritage	SAMF site TPS and Stop construction zones BOCC	Soil and Water Management Sub Plan and Construction Waste and Resources Management Sub Plan - The following strategies would be employed to minimise impacts: Maintenance to ensure effective functioning of the site boundary erosion sediment control fence and water treatment plant, progressive erosion and sediment controls around work areas, monitoring of water treatment plant discharge, good site housekeeping, testing and treatment of any groundwater abstracted or rainwater collected prior to discharge, location of stockpiles, wastes and contaminants outside of drainage lines and flood-prone areas, unexpected contamination finds procedure, environmental incident and emergency response procedure to be followed in case of contaminant spills, availability of spill kits, appropriate storage of contaminants and wastes to prevent escape, training, regular review of mitigation effectiveness.	Major	Unlikely	High	Environmental Control Maps will be prepared for each construction zone and will incorporate relevant sensitive areas, mitigation measures and controls, including those from relevant management sub plans. ECMs are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.
6.5	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks	Impact to heritage	Heritage	There is no known heritage within the SAMF site. Remediation of the site would preclude the potential for undiscovered heritage. All works at the Stop construction zones is above ground Minor surface excavation works will take place at the TPS construction zones for	Environment - Environment Effects / Cultural Heritage	TPS construction zones BOCC	Heritage Management Sub Plan - Unexpected Finds Procedure	Moderate	Very Unlikely	Low	Environmental Control Maps will be prepared for each construction zone and will incorporate relevant sensitive areas, mitigation measures and controls, including those from relevant management sub plans. ECMs are specifically designed to

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	- Utilities installation			sub-structure and utilities connections.							communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.
6.6	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	Impact to flora and fauna	Flora and Fauna	Non Applicable - All vegetation removal has been completed prior to supply Operate and Maintain Works (Package 5) Construction would not impact vegetation outside of the construction zones.	Reputation - Government / Media / Stakeholders	SAMF site TPS and Stop construction zones BOCC	If any flora or fauna are identified with a construction zone the Flora and Fauna Management Sub Plan requirements will be implemented. Flying Fox Monitoring program will be implemented to assess impacts of construction works.	Minor	Very Unlikely	#N/A	Environmental Control Maps will be prepared for each construction zone and will incorporate relevant sensitive areas, mitigation measures and controls, including those from relevant management sub plans. ECMs are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.
6.7	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation - Roadworks - Utilities installation	Disturbance to contaminated land resulting in inappropriate waste disposal / material cross contamination / inappropriate site management of material	Waste and Hazardous Material	Stop work delays affecting project programme, and increased costs (material management / disposal costs) Regulatory fine / prosecution	Environment - Environment Effects / Cultural Heritage	SAMF site and known contaminated areas defined in the EIS.	Contaminated Land Management Plan - The following strategies would be employed to minimise impacts: - Implementation of LTEMP's for sites. - Visual inspections and monitoring will be performed during excavation. - Unexpected contaminated material will be dealt with in accordance with the Unexpected Finds Procedure. Contaminated materials will be stored in an impervious bunded area and covered to avoid the risk of leachate, odours or contaminated dust, as directed by a suitably qualified person. - Staff will be trained on the identification and management of potential contamination issues.	Moderate	Likely	Medium	None
6.8	Civil construction: - Earthworks - Drainage installation - CSR installation - Fencing and gates installation	Flood impacts to neighbouring properties	Community	Construction activities such as: stockpiling, inappropriate ERSED controls or poor housekeeping obstructing site drainage or water flow path.	Environment - Environment Effects / Cultural Heritage	TPS and Stop construction zones BOCC	The Construction Soil and Water Management Plan and Construction Flood Management Plan requirements will be implemented to avoid flooding impacts to neighbouring properties	Moderate	Very Unlikely	Low	Ensure work site can be evacuated and people and plant if flood is expected.

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	- Roadworks - Utilities installation										
6.9	Civil construction: - Earthworks - Drainage - Landscaping	Contamination of site as a result of contaminated material import	Land Contamination	Materials imported without appropriate certificates containing contaminants	Environment - Environment Effects / Cultural Heritage	SAMF site TPSs BOCC	WRMP details controls for imported material. Engineering team to maintain material import register, internally audited during construction by EPS team	Moderate	Very Unlikely	Low	None
7.1	Testing and commissioning - LRV - BOCC - TPS	Noise impacts to nearby receivers on power up and testing of PLR components	Noise and Vibration	Complaints received on community hotline Complaints received and investigation from regulators resulting in potential stop work	Reputation - Community	Whole alignment	Construction Noise and Vibration Management Sub Plan - The following strategies would be employed to minimise impacts: Pre-works sampling to develop baseline values, noise emission monitoring at nearby receivers, application of noise abatement strategies if required, high noise tasks to be scheduled to minimise disruptions to receivers, respite periods to be applied as required, notification of nearby receivers of high noise activities, training, regular review of mitigation effectiveness.	Minor	Likely	Low	The Project will implement the DPIE approved Parramatta Light Rail – Stage 1 Out-of-Hours Work Protocol (Rev 8.3 4 November 2019).
7.2	Testing and commissioning - LRV - BOCC - TPS	Traffic impacts as a result of testing and commissioning	Traffic, Transport and Access	Complaints received on community hotline Complaints received and investigation from regulators resulting in potential stop work	Reputation - Community	Whole alignment	Construction traffic management plan processes to be followed to undertake testing and commissioning with minimal impact.	Minor	Likely	Low	None
7.3	Whole of project duration	Non-compliance with Legislative requirements (Planning/EPL/Legislation)	Systems and Documentation	Administrative Prosecution or suspension of Project Approval or Licence	Financial - Project / Program / TPD Budgets	N/A	Training to be implemented in accordance with the CEMP and Sub-plans to ensure site staff are aware of environmental obligations. The Project induction and Pre-starts are utilized to address items that are priority at that stage of construction (such as works around heritage items) Periodic compliance reviews and reporting will track performance against CEMP requirements and allow gap analysis for close out actions.	Major	Unlikely	High	None
8.1	Sustainability - Contract	Project unable to meet contractual ISCA Target	Economic	Non-conformance with contractual obligation	Financial - Project / Program / TPD Budgets	N/A	Dedicated sustainability resource engaged to develop and implement sustainability delivery management plan and drive development /support the project during the ISCA submission process.	Moderate	Unlikely	Low	None
8.2	Sustainability - Waste Management	Project unable to meet contractual waste diversion targets	Environment	Non-conformance with contractual obligation and inability to meet ISCA Was 1 & 2 credits	Sustainability Performance	N/A	Implementation of the project WRMP and DPSMP. Frequent auditing and tracking to determine performance against target.	Moderate	Unlikely	Low	None
8.3	Sustainability - Procurement	Unable to meeting procurement requirements in	Economic	Procurement processes not aligned with Pro 1-4 requirements.	Sustainability Performance	N/A	Procurement Policies and plans to be reviewed and assessed across all contractors to ensure alignment with principal contractor procurement principles.	Moderate	Unlikely	Low	None

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		Contract/ISCA due to multiple contractor involvement		Subcontractor assessments not considering sustainability during on-boarding. Missed innovation opportunities.							
8.4	Sustainability - Resource Usage	Design and construction activities do not meet contractual Energy, Water and Material Reduction Targets	Environment	Non-conformance with contractual obligation and inability to meet ISCA Mat 1 & 2, Ene 1 & 2 and Wat 1 & 2 Credits.	Sustainability Performance	N/A	Implementation of reduction strategies outlined in the DPSMP during construction. Dedicated resource to manage and review sustainability considerations during design and model performance.	Moderate	Unlikely	Low	None
8.5	Sustainability - Climate change	Climate change not considered during design and operations	Environment	Climate change adaptations not considered and addressed in detailed design.	Sustainability Performance	N/A	Dedicated resource to manage and review climate change considerations during design and track performance.	Moderate	Unlikely	Low	None
8.6	Sustainability - Social	Community consultation and engagement not sufficient to empower community to provide feedback or be engaged with the project.	Social	Community consultation and engagement not undertaken or consistent enough to inform, include and empower local community groups during design and construction.	Sustainability Performance	N/A	Community engagement team to implement CSEP, supported by Sustainability resource to align with ISCA Requirements.	Moderate	Unlikely	Low	None
<p>* An Environmental Aspect is an element of the organisation's activities or products or services that can interact with the environment. (AS/NZS ISO14001:2004)</p> <p>** An Environmental Impact is defined as any change to the environment or a component of the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects. (AS/NZS ISO14001:2004)</p> <p>*** Risk description. This is the articulation of the resultant risk given the aspect and impact at the site.</p>											

Table3: Environmental Risk Identification for different types of incidents that may occur at the site.

