WOOLGOOLGA TO BALLINA UPGRADE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

W2B-PC0-0-EX-PLN-00003

<table>
<thead>
<tr>
<th>REV</th>
<th>DATE</th>
<th>DESCRIPTION</th>
<th>ORIGINATOR</th>
<th>REVIEWER</th>
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<tr>
<td>0</td>
<td>10/02/2016</td>
<td>Draft for comment</td>
<td>CG</td>
<td></td>
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<tr>
<td>0</td>
<td>25/02/2016</td>
<td>Final incorporating comments</td>
<td>CG</td>
<td>TG/MN</td>
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<tr>
<td>1</td>
<td>04/04/2016</td>
<td>Issue for use</td>
<td>CG</td>
<td>HM</td>
<td>HM</td>
</tr>
<tr>
<td>2</td>
<td>20/10/16</td>
<td>Updated Contacts</td>
<td>TH</td>
<td>CG</td>
<td>CG</td>
</tr>
<tr>
<td>3</td>
<td>26/4/2017</td>
<td>Updated Contacts</td>
<td>TH</td>
<td>CG</td>
<td>CG</td>
</tr>
<tr>
<td>4</td>
<td>21/8/2017</td>
<td>Revised Contacts and add Appendix B</td>
<td>TH</td>
<td>CG</td>
<td>TG</td>
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<tr>
<td>5</td>
<td>5/7/2018</td>
<td>Updated contacts, Sections 9/11/13/15, Appendix A; and inclusion of Appendix C – updates closing out EPA Audit Findings</td>
<td>TH</td>
<td>MM</td>
<td>TG</td>
</tr>
<tr>
<td>6</td>
<td>17/12/2019</td>
<td>Updated contacts, Appendix A</td>
<td>TH</td>
<td>MM</td>
<td>TG</td>
</tr>
</tbody>
</table>

This document is a controlled document prepared in accordance with AS/NZS ISO 9001:2008 Quality Management Systems Requirements, and is regularly reviewed and updated. Audits confirming the effective implementation of the procedures / activities described herein provide verifiable evidence that Pacific Complete conforms to specified requirements.
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1. PURPOSE

Pacific Complete considers environmental management to be paramount to all of our business activities.

The project has developed a Construction Environmental Management Plan (CEMP) to address the requirements of the Minister’s Condition of Approval, comply with the relevant provisions of environmental legislation and mitigate environmental impacts.

The CEMP covers the works between Glenugie and Ballina.

The CEMP includes procedures and management measures to address incident management and emergency planning and response requirements.

The project is a scheduled activity in accordance with the Schedule 1 of the Protection of the Environment Operations Act 1997. As a result, an Environment Protection Licence (EPL) is required to undertake project activities. The project has applied for and received EPL 20713.

This Pollution Incident Response Management Plan has been developed to address the requirements of the Protection of the Environment Operations Act 1997 and in particular, the requirement to develop and implement a Pollution Incident Response Management Plan for premises with an Environment Protection Licence.

2. SCOPE OF THE PROJECT

On behalf of the Australian and NSW governments, NSW Roads and Maritime Services (Roads and Maritime) is progressively upgrading the Pacific Highway to dual carriageway between the Hunter and NSW/Queensland border.

The Woolgoolga to Ballina Pacific Highway Upgrade (the project) involves upgrading approximately 155 kilometres (km) of highway to four-lane dual-carriageway road between Woolgoolga (north of Coffs Harbour) and Ballina (near the NSW/Queensland border) on the NSW north coast. The project bypasses the towns of Grafton, South Grafton, Ulmarra, Woodburn, Broadwater and Wardell. The project will include road duplication, alignment modification and new road sections. Once complete, the project will create a four-lane divided road, with two lanes in each direction. It would also allow for the road’s upgrade in the future to a six-lane divided highway.

The project will be delivered by Pacific Complete, appointed as the Delivery Partner (DP) by Roads and Maritime Services (Roads and Maritime).

Pacific Complete (PC) comprises Laing O’Rourke Australia Construction Pty Ltd and WSP working in close collaboration with Roads and Maritime.

3. DISTRIBUTION POLICY

The master "controlled" PIRMP document will be held on Teambinder where it can be accessed by personnel as necessary.

All paper copies of this PIRMP will be considered as "uncontrolled" unless they have been allocated a copy number in a colour other than black.

Where required, controlled copies of this PIRMP will be published as a hard copy, allocated a copy number (in a colour other than black) and distributed as follows:
DISTRIBUTION TABLE

<table>
<thead>
<tr>
<th>Copy no.</th>
<th>Issued to</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Programme Director</td>
</tr>
<tr>
<td>02</td>
<td>Environment and Sustainability Manager</td>
</tr>
<tr>
<td>03</td>
<td>Portion Leader</td>
</tr>
<tr>
<td>04</td>
<td>Portion Environmental Leader</td>
</tr>
</tbody>
</table>

Table 1 – Controlled Copy Distribution Table

3.1 Issue, revision and reissue

The initial issue of this plan has been prepared by the Pacific Complete Environment and Sustainability Manager to ensure it meets the requirements of the current Construction Environmental Management Plan (CEMP), Environment Protection Licence (EPL, policy, contract, specifications and standards). The plan is approved for use on the project by the Programme Director.

Revisions of this PIRMP may be required throughout the duration of the project to reflect changing circumstances or identified deficiencies.

Revisions may result from:

- Management review
- Audit (either internal or by external parties)
- Client complaints or non-conformance reports
- Changes to the company’s standard system
- Changes to legislation or legal requirements

Revisions will be reviewed and approved by the Programme Director prior to issue. Updates to this plan will be numbered consecutively and issued to holders of controlled copies.

TERMS & DEFINITIONS

The following terms, abbreviations and definitions are used in this plan.

<table>
<thead>
<tr>
<th>Terms</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAR</td>
<td>Corrective Action Register</td>
</tr>
<tr>
<td>CEMP</td>
<td>Construction Environmental Management Plan</td>
</tr>
<tr>
<td>CoA</td>
<td>Conditions of Approval</td>
</tr>
<tr>
<td>EMS</td>
<td>Environmental Management System</td>
</tr>
<tr>
<td>ER</td>
<td>Environmental Representative</td>
</tr>
<tr>
<td>EPA</td>
<td>NSW Environment Protection Authority</td>
</tr>
<tr>
<td>EPL</td>
<td>Environment Protection Licence</td>
</tr>
<tr>
<td>ERAP</td>
<td>Environmental Risk Action Plan</td>
</tr>
<tr>
<td>HSEQ</td>
<td>Health, Safety, Environment and Quality</td>
</tr>
<tr>
<td>LORAC</td>
<td>Laing O’Rourke Australia Construction Pty Limited</td>
</tr>
<tr>
<td>EWMS</td>
<td>Environmental Work Method Statement</td>
</tr>
<tr>
<td>SDS</td>
<td>Safety Data Sheet</td>
</tr>
<tr>
<td>OOHW</td>
<td>Out of Hours Works</td>
</tr>
<tr>
<td>PC</td>
<td>Pacific Complete</td>
</tr>
</tbody>
</table>
Terms | Explanation
--- | ---
Project Contractors | Organisations engaged in the delivery of the services and the works associated with the Project
TeamBinder | The Project’s electronic document management system
W2B | Woolgoolga to Ballina Pacific Highway Upgrade Project

Table 2 – Terms and Definitions

4. **DEFINITION OF A POLLUTION INCIDENT**

Pollution incident means 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 noise.

5. **DUTY TO REPORT A POLLUTION INCIDENT**

Under the POEO Act there is a duty to immediately report a pollution incident associated with the project where material harm to the environment occurs or is threatened. It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Harm to the environment is material if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- 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).

Leaks, spills, water discharges and other pollution incidents can harm the environment. The relevant regulatory authorities need to be informed of pollution incidents immediately, so that action can be coordinated to prevent or limit harm to the environment. Regulatory authorities and notification responsibilities are given below.

6. **REGULATORY AUTHORITIES AND PROJECT PERSONNEL TO BE NOTIFIED**

Below is a list of the relevant regulatory authorities and project personnel to be notified of any pollution incidents that trigger the operation of this PIRMP.

**CONTACT DETAILS TABLE**

<table>
<thead>
<tr>
<th>Contact</th>
<th>Phone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPA Pollution Hotline</td>
<td>131 555 or (02) 9995 5555 (if calling from outside NSW).</td>
</tr>
<tr>
<td>Ministry of Health: North Coast Public Environmental Health</td>
<td>1300 066 055 0428 882 805 (after hours)</td>
</tr>
<tr>
<td>WorkCover</td>
<td>13 10 50</td>
</tr>
<tr>
<td>Fire and Rescue NSW</td>
<td>000 or 1300 729 579 (if not considered an emergency)</td>
</tr>
<tr>
<td>Ballina Council (Portion D CH 145500 – CH 164100)</td>
<td>(02) 6686 4444</td>
</tr>
</tbody>
</table>
Table 3 – Contact Details Table

7. NOTIFICATION PROCEDURES

7.1 Responsibilities

Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying out the activity;
- an employee or agent carrying out the activity;
- an employer carrying out the activity; and
- the occupier of the premises where the incident occurs.

On the Woolgoolga to Ballina Upgrade Project the Programme Director and Environment and Sustainability Manager must be notified immediately after a person becomes aware of a pollution incident. The Programme Director or Environment and Sustainability Manager will then be the point of contact for notifying Roads and Maritime Services and all relevant regulatory authorities.

Responsibility and notification processes for environmental incidents are documented in the Construction Environmental Management Plan.
7.2 Notification Procedure

This procedure applies to all personnel on the Woolgoolga to Ballina Upgrade Project. This includes Project Contractors and other organisations who are undertaking project related activities on the site.

Project Contractors and other organisations operating on the project must notify Pacific Complete immediately upon becoming aware of an environmental incident.

Below is a step by step procedure for notifying pollution incidents on the Woolgoolga to Ballina Upgrade Project:

1. Assess the situation and if safe to do so, immediately rectify the pollution source and control the migration of any pollution.
   
   This may include constructing temporary bunds, using spill kits, creating diversion drainage.
   
   Deploy spill kits or other containment equipment
   
   Ensure access routes for spills to any surrounding drains or waterways are blocked.
   
   The relevant EWMS or Construction Environmental Management Plan provides details of the control measures.
   
   If the pollution source cannot be controlled, external emergency services (NSW Fire Brigade) are to be contacted on 000.

2. Immediately notify the Pacific Complete Surveillance Officer or Environment and Sustainability Manager of the pollution incident, giving details such as location, volumes of pollutants and circumstances of the incident.

3. The Pacific Complete Environment and Sustainability Manager will then inform the Programme Director who will arrange for notification to Roads and Maritime Services. If the incident is not able to be contained by means of the Project, notify the emergency services to aid in control of the incident.

4. If incident is near port waters or a waterway, immediately contact Yamba Harbour Master and/or NSW Fisheries.

5. If deemed to be required, the Environment and Sustainability Manager or the Programme Director will notify the EPA immediately giving the details as listed in Section 8 below.

6. If additional information regarding the incident becomes known after the initial notification is made, that information will be provided to the authorities immediately after it becomes known by the Environment and Sustainability Manager.

7. The Programme Director will coordinate the internal notification protocols for Pacific Complete.

Once the incident has been controlled, Pacific Complete will commence an investigation in accordance with the procedures outlined in the CEMP.
Any follow up reports required by the Environment Protection Licence conditions will be submitted to the EPA by the Environment and Sustainability Manager within the given timeframes.

This reporting would include but not limited to:

- the cause of the incident,
- any environmental harm or potential harm caused,
- actions that have been undertaken to rectify, reduce or remediate the pollution incident,
- responsibilities for the incident, and
- actions to be implemented to avoid repeat occurrences of a similar incident.

8. NOTIFICATION AND EMERGENCY SERVICES

8.1 Regulatory Authority

Pollution incidents posing material harm to the environment must be notified to the Environment Protection Authority.

Project Contractors must immediately notify the Pacific Complete Environment and Sustainability Manager of any incidents that may trigger the reporting requirements.

Notification will be made by Pacific Complete to the EPA’s Pollution Line on 131 555.

The relevant information about a pollution incident required to be reported consists of the following:

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

If the information required by items (3) to (5) becomes known after the initial notification is made, that information must be provided to the authorities immediately after it becomes known.

A person/project must notify even though the notification might incriminate the person/project. However the notification is not admissible in evidence against the person/project for an offence.

8.2 Emergency Services

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and it threatens public health, property or the environment, the NSW Fire Brigade should be contacted for emergency assistance - phone 000.

In addition, if advice is needed on cleaning-up the incident or on the disposal of any resulting waste materials, EPA staff can be contacted 24-hours/day via Pollution Line on 131 555. If the NSW Fire Brigade is called, they may notify the EPA if they consider it necessary. Notification by the NSW Fire Brigade does not negate the need for person carrying on the activity or the occupier of the premises to notify the EPA.
8.3 Contaminated Land

Any project activities that cause the contamination of land or owners of land who become aware that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination it meets the legislative criteria.

The duty to notify is a requirement under section 60 of the Contaminated Land Management Act 1997 (CLM Act).

9. COMMUNITY AND STAKEHOLDER NOTIFICATION

Community notifications associated with pollution incidents will be undertaken in line with the Community Liaison Plan and the Environment Protection Licence.

Notification to immediate neighbours and other stakeholders will be coordinated by the Environment and Sustainability Manager and the Communications and Stakeholder Engagement Manager.

Neighbours, owners and occupiers of property in the vicinity of the project will be notified in accordance with the PIRMP and kept updated where there is potential impact to health, their property or the adjacent environment.

10. INCIDENT RESPONSE ACTIONS

Refer to the CEMP Emergency Response and Preparedness for site specific incident response actions to be carried out in the case of a pollution incident.

11. HAZARDS

Pacific Complete have completed risk assessment of the site and identified hazards. The risk assessment is contained in Appendix A2 of the CEMP.

Hazards with the potential to cause a pollution incident include:

- Spills / leaks from plant;
- Chemical and fuel storage;
- Land contamination;
- Asbestos exposure;
- Unexpected finds i.e. contamination;
- Dust generation;
- Inclement weather;
- Water contamination.

In accordance with Section 98C (1)(d) of the Protection of the Environment Operations (General) Regulation 2009, an inventory of potential pollutants on the premises or used in carrying out the W2B Pacific Highway Upgrade is included in Appendix C. This inventory addresses each of the major site compound ancillary facilities where potential pollutants may be stored.

In accordance with Section 98C (1)(k) of the Protection of the Environment Operations (General) Regulation 2009 detailed maps of the entire alignment are included within the project wide Geographic Information System (GIS) known as “W2B site map”. W2B site map is project specific and detailed web based GIS interface available to all project staff and contractors and includes comprehensive data to address the requirements of 98C (1)(k). In particular layers directly identifying the following are available on W2B site map:

- Complete EPL premises boundary
- Entire surrounding area
• Locations of compounds and ancillary facilities (where major potential pollutants are located)
• Residents and sensitive receivers
• Waterways and stormwater drains

12. PRE-EMPTIVE ACTIONS TO BE TAKEN

Pre-emptive actions taken to minimise the likely hood of hazards occurring include:
• Project induction to inform personnel in relation to emergency preparedness and response;
• Ongoing training through toolbox talks, pre-start meetings and emergency drills;
• Contaminated Land Management Plan and CEMP;
• Spill containment kits on site;
• Water carts on site;
• Erosion and sediment controls.

13. ENVIRONMENTAL MAPPING SYSTEMS

Sensitive Area Plans, Environmental Work Method Statements and Erosion and Sediment Control Plans detail controls implemented on site to prevent pollution incidents.

Sensitive Area Plans are retained within the project’s Geographic Information System (GIS) W2B SiteMap. In accordance with Section 98C (1)(k) of the Protection of the Environment Operations (General) Regulation 2009 detailed maps of the entire alignment are included within the project wide Geographic Information System (GIS) known as “W2B site map”. W2B site map is project specific and detailed web based GIS interface available to all project staff and contractors and includes comprehensive data to address the requirements of 98C (1)(k). In particular layers directly identifying the following are available on W2B site map:
• Complete EPL premises boundary
• Entire surrounding area
• Locations of compounds and ancillary facilities (where major potential pollutants are located)
• Residents and sensitive receivers
• Waterways and stormwater drains

Environmental Work Method Statements and Erosion and Sediment Control Plans relevant to the works are maintained by Project Contractors and retained by Pacific Complete within TeamBinder.

14. SAFETY EQUIPMENT

The location of spill kits and environmental controls will be detailed by Project Contractors in consultation with Pacific Complete. Locations will be maintained by Project Contractors and included in their workforce documentation as outlined in the CEMP. Locations will be notified to Pacific Complete.

Safety equipment, controls and personnel protective equipment required for the works are detailed in Safe Work Method Statements.

Project Contractors will ensure that their personnel are trained in the requirements of this plan, the implementation of associated procedures and the application of emergency equipment and materials.
A Safety Data Sheet (SDS) folder is kept within the chemical storage container. Copies of all plans are readily available on site and supplied to all work crews. Electronic copies of plans are available on TeamBinder.

15. PREPARE, TEST AND MAINTAIN

After preparation of this PIRMP, it is to be tested via a mock pollution incident at least annually to ensure personnel are aware of the processes and responsibilities on site. This test may be undertaken with a combined test of the Emergency Response Plan for the Project. Testing of this plan and any supplementary amendments that are made are to be documented and stored with the Project files and may be requested by the EPA at any time.

Project Contractor’s will be required to undertake or participate in pollution incident response testing as directed by Pacific Complete.

A PIRMP Test Tracking spreadsheet can be seen in Appendix A. A copy of the completed tracking spreadsheet will be retained on the project network. In addition the Appendix A Test Tracking register of this PIRMP will be updated at least annually to provide documented record of PIRMP testing in accordance with Section 98C (1)(n) of the Protection of the Environment Operations (General) Regulation 2009. Where Project Contractor’s undertake PIRMP testing, they shall retain records of each test. Project Contractors are required to provide to Pacific Complete records for each PIRMP operation or test within 7 days of the event.

The PIRMP will be reviewed and maintained to ensure information in the plan is accurate and up to date. The review process will occur every 12 months and within one month of any pollution incident occurring. This will ensure any issues within the plan are identified and revised.

16. STAFF TRAINING

All Pacific Complete staff will be trained progressively throughout the project development. Requirements relating to incident notification and the implementation of this Pollution Incident Response Management Plan will be included in the project induction.

Tool box talks will be presented to educate workers of preventative actions, controls, PIRMP updates, site issues and environmental pollution incidents involved in the site.

The tool box talk will present a chance for workers to raise any concerns or issues in the project and PIRMP.

Project Contractors and organisations operating on the site are required to train their personnel on the emergency procedures and this Pollution Incident Response Management Plan. This includes inclusion of PIRMP requirements in their project induction, toolbox talks and other consultation forums.

They are required retain records of training in relation to the PIRMP. Records are to be provided to Pacific Complete upon request.
## Appendix A: PIRMP Test Tracking Spreadsheet

<table>
<thead>
<tr>
<th>W2B PIRMP Test</th>
<th>Reference Tracking Personnel Involved</th>
<th>Position on Project</th>
<th>Responsibility</th>
<th>Amendments Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13/10/2016</td>
<td>Chris Greenaway</td>
<td>Environment Manager, Pacific Complete</td>
<td>Incident notifications &amp; internal management communication</td>
<td>Update Contact Details within the PIRMP to include additional stakeholders &amp; re-issue to all.</td>
</tr>
<tr>
<td></td>
<td>Adam Playne</td>
<td>Environment Lead, Portion C, Pacific Complete</td>
<td>Incident notification</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Matthew Neeson</td>
<td>Environmental Advisor, Portion C, Pacific Complete</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Morgan Hamilton</td>
<td>Environment Manager, SEE Civil</td>
<td>Yes to Contractors PIRMP: Include a list of local operators who could be available at short notice or after hours to contain spills.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Brendan Krushka</td>
<td>Area 1 Supervisor, SEE Civil</td>
<td>Yes to Contractors site inductions: to include areas of poor mobile reception, and closest area where calls can be made.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Alisha Croft</td>
<td>Environmental Advisor, SEE Civil</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Chris Farrel</td>
<td>Leading Hand, SEE Civil</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Summary of test/event:

Portion C tested the plan through a simulated scenario with contractor SEE Civil (outlined below):

- 2 days ago a 35mm rainfall event occurred over the catchment, which has closed site. Today (13/10/16) is the first day back since rainfall.
- The bottom sump has been half emptied via the float valve automated pump, however the pump ran out of fuel.
- The bunds upstream are progressively being emptied, starting at the top of the catchment working to the bottom sumps. 4 have been emptied so far.
- The turkey nest is 50% empty as there was an issue with the irrigation system that has just been fixed.
- All the pumps require refuelling.
- At approx. 1400 the bottom pump (on the sump) is moved to the top of the catchment (as per the refuelling procedure - >50m from a watercourse). While refuelling, the pump was left unattended which resulted approx. 300lttrs of diesel spilling from the tank and onto the pad.
- Time now is 1430
- A storm (95% chance of 200-300mm) is forecast, expected to hit site around 1800

### Main objectives:

- To test the effectiveness of the Pacific Complete Pollution Incident Response Management Plan (PIRMP).
- To test the irrigation systems installed in the Fish management areas within Area 1 of Wave 5C with SEE Civil (Site Contractors).

(refer to document W2B-PC0-0-EX-RPT-00025)

PIRMP was updated from the amendments noted above (W2B-PC0-0-EX-PLN-00003 - Revision B).
<table>
<thead>
<tr>
<th>W2B PIRMP Test Date</th>
<th>Personnel Involved</th>
<th>Position on Project</th>
<th>Responsibility</th>
<th>Amendments Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>30/5/2017</td>
<td>Dylan Greeff</td>
<td>Environmental Lead, Portion E, Pacific Complete</td>
<td>Incident notification &amp; communications</td>
<td>Add Pacific Complete Deputy Programme Director to contact list. An order of priority may be assigned to the contacts to ensure information is disseminated in the best manner. Inclusion of Category 1 Incident Notification Protocol as an Appendix to the PIRMP. Remove individual names from contact list &amp; use department telephone numbers instead. Add Clarence Valley Council after hours contact number to contact list.</td>
</tr>
<tr>
<td></td>
<td>Jason Haslett</td>
<td>Environmental Manager, Acciona Ferrovial Harwood Joint Venture</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Chris Greenaway</td>
<td>Environment Manager, Pacific Complete</td>
<td>Internal management communications</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Simon Cross</td>
<td>Portion Lead, Portion E, Pacific Complete</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Summary of test/event:**

On Tuesday 30th May 2017, AFHJV ran a PIRMP drill to ensure that process outlined in the management plan was actionable. AFHJV formulated a scenario and at 09:20am informed Dylan Greeff (PC Environmental Advisor) of a hypothetical pollution event during works in the Clarence River.

The scenario used was that during marine piling works, a fuel pod was being lifted from the marine piling contractor’s barge in the Clarence River to a working punt, when it was lost into the river. It was estimated that approximately 200L of hydrocarbon escaped from the fuel pod. An emergency spill response was enacted and as a result approximately 100L of hydrocarbon was contained by existing site controls and the response team’s containment actions. Unfortunately 100L was lost further downstream on the outgoing tide.

It should be noted that a desktop study of the contact details for the above was undertaken to ensure the correct contact details were in PIRMP – no discrepancies were identified.


PIRMP was updated from the amendments noted above (W2B-PC0-0-EX-PLN-00003 - Revision D).
**Summary of test/event:**

Phone notification of PIRMP drill received from Mick Browne. Details “LV roll over into Chaffin Creek. Driver trapped. Fuel leaking into Creek. PIRMP triggered. Emergency Services notified – assumed to be Fire and Rescue. Notifications in progress.”

Martin Mulhearn commenced incident notification process advising Tim Gooley who commenced internal management incident notification.

PIRMP followed successfully. One update required to contact list – updating the contact details for Ministry of Health.


PIRMP was updated from the amendments noted above (W2B-PC0-0-EX-PLN-00003 - Revision E).
Summary of test/event:

Details: A member of the public driving a B double semi-trailer has had to pull to the side of the highway south of Bridge 01 Maclean cut when his truck caught fire. The truck driver was able to disconnect the trailers and move the prime mover forward to prevent the trailers from catching alight. The prime mover was towed from the scene. During the incident fuel was spilt onto the highway and entered the project boundaries where it ran down a drain. The fire ignited the fuel spill causing potential damage to the drainage network. A bund was put in place to prevent further fuel entering the drain.

PIRMP was activated and Emergency services notified, attending the scene along with local fire brigades to extinguish the fire.

Site cleaned up and checked for damage reported to RMS and environmental agencies.

Portion B Environmental Lead commenced incident notification process advising Pacific Complete Environment and Sustainability Manager who commenced internal and external incident notification processes.

PIRMP followed successfully. One update required to contact list – adding the contact details TfNSW Traffic Team.

PIRMP was updated from the amendments noted above (W2B-PC0-0-EX-PLN-00003 - Revision F).
Appendix B: Category 1 Incident Notification Protocol

1. Category 1 incident identified
2. Contractor provides verbal notification to Pacific Complete immediately.
   a. Pacific Complete to determine if notification as a pollution event to EPA is required – if it is determined to be a pollution event the PIRMP is implemented.
3. The Pacific Complete portion environmental representative (Pacific Complete Portion Environmental Leader or Environmental Advisor) advises the Pacific Complete Environment and Sustainability Manager
4. The Pacific Complete Environment and Sustainability Manager advises the TfNSW Environment Manager of the Category 1 Incident
5. The Pacific Complete Environment and Sustainability Manager contacts the Pacific Complete Programme Director and Construction Services Director
6. The Pacific Complete Portion Environmental Representative advises the Pacific Complete Package Manager. The Package Manager is to advise the Portion Leader.
7. The Portion Leader advises the Construction Leader.
8. Within 1 hour the contractor prepares a briefing note on the incident including the items below and issues it to Pacific Complete via email. The briefing note is to be issued by the Contractor’s Project Manager to Pacific Complete’s Package Manager, Portion Environmental Representative and Pacific Complete Environment and Sustainability Manager:
   - Initial incident details – nature of the incident, pollutants, quantities if known
   - Any off site impacts
   - Any impacts to native vegetation
   - Any impacts to third party property
   - Any impacts to community
   - Initial actions proposed or taken to prevent further impact
9. The Pacific Complete Environment and Sustainability Manager provides the email to the Programme Director and Construction Services Director.
10. The Programme Director informs TfNSW senior management
11. The contractor commences ICAM investigation
12. The Portion Environmental Representative forwards the email to the Portion Leader who forwards to the Pacific Complete Construction Leader. Pacific Complete’s Environment and Sustainability Manager will inform the Project’s Environmental Representative.
13. Within 24 hours, the Contractor is to update Pacific Complete on the incident including the completion of TfNSW incident report form 624. The Contractor’s Project Manager is to issue the report to the Package Manager.
14. The Package Manager updates the Portion Leader and the Construction Leader and provides the updated details to the Pacific Complete Portion Environmental Representative
15. The Pacific Complete Portion Environmental Representative will issue the TfNSW incident report form 624 to the TfNSW Environment Manager and the Pacific Complete Environment and Sustainability Manager.
16. The Pacific Complete Portion Environmental Representative will enter the details of the Category 1 incident from the information in the 624 Form into the IMPACT system within 48 hours of the incident.
17. The Pacific Complete Programme Director updates TfNSW senior management with additional details on the incident including form 624.
18. Within 7 days, the Contractor Project Manager is to present the findings of the ICAM investigation to the Pacific Complete Package Manager and Pacific Complete Portion Leader.
19. ICAM report and associated summary to be provided to the Pacific Complete Environmental Representative.
20. Pacific Complete Environmental Representative issues the report and summary to the Pacific Complete Environment and Sustainability Manager.
21. The Pacific Complete Environment and Sustainability Manager updates the Programme Director and Construction Services Director.
22. The Pacific Complete Environment and Sustainability Manager updates the TfNSW Environment Manager with the ICAM report and summary.
Appendix C: Inventory of Potential Pollutants
Environmental Summary Report

Client: Pacific Complete
Project NO: JN524
Location: Avenue, Tyndale, McIntyre’s Lane, Iluka, Broadwater, McAndrew’s Lane

August 2018
# Environmental Summary Report

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1. PROJECT DETAILS

**Contract:** W2B JN524

**Principal Contractor:** Pacific Complete

**Principal Contractor’s representative:** James Mannion

**Period Covered:** August 2018

2. Inventory of Potential Pollutants

The hazardous substance Safety Data Sheets (SDS) register below provides an overview of potential pollutants that are kept onsite or offsite, allowing risk and hazards to be identified, including controls to minimise those identified risk through control measures. These risks, hazards and controls are captured in Safe Work Method Statements (SWMS) and the SDS are kept on each compound site. The quantities are captured in the register and the locations are captured in both the register and the detailed site maps in section 5.

Appendix 1. CBC SDS Register

Not included in this SDS register are the following items which are further highlighted in section 3, including their location detailed in the site maps section:

- Gas bottles kept with BBQs on each site
- Effluent tanks
- Septic waste tanks
3. Quantities of Potential Pollutants

The following information provides quantities of the substances which are ‘stored’ on site but are not in the hazardous substances inventory register above.

<table>
<thead>
<tr>
<th>NAME</th>
<th>STORAGE</th>
<th>QUANTITIES</th>
<th>LOCATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas Bottles</td>
<td>Currently with BBQ’s</td>
<td>2 x 9Kg</td>
<td>All Sites</td>
</tr>
<tr>
<td>Effluent Tanks</td>
<td>In bunded outdoor area</td>
<td>2 x 22700L</td>
<td>All sites except Broadwater</td>
</tr>
<tr>
<td>Septic Waste Tank</td>
<td>In Bunded Outdoor area</td>
<td>28390L</td>
<td>All sites except Broadwater</td>
</tr>
<tr>
<td>Chemical Storage Container</td>
<td>Bunded Outdoor area</td>
<td>0790L</td>
<td>All Sites</td>
</tr>
</tbody>
</table>

These locations are in more detail in the compound site maps appendices section.

4. Environmental Safety Equipment

The following equipment is located at access points on each site compound and are highlighted on the site maps that are in section 5.

   1. Spill Kits – Photo below is similar to what is currently onsite.

The contents of the spill kits include:

- 50 Hazchem absorbent pads 430 x 480 mm
- 4 general purpose booms 1.2 m x 75 mm
- 2 general purpose booms 3 m x 75 mm
- 3 absorbent floor sweep 50 ltr bags
- 10 contaminated waste bags and ties
- 2 pairs oil resistant gloves
- 1 adhesive wall locator
- 1 weather resistant kit cap
- 1 labelled wheelie bin 270 ltr
Appendix 2. See attached Spill Response Kit Instructions and Spill Response Procedure that are located inside the bins.

2. Chemical Storage Container

These containers have bunds that have the capacity to contain 0790L of hazardous substance spill. They are marked up in the site compound maps attached in the Appendices section.
5. Site Compound Maps

The site compound maps detail the locations of the following:

- Effluent Tanks
- Septic Waste Tanks
- Chemical Storage Container
- Gas bottles

The drawings also detail the following which are managed by Pacific Complete;

- Compound boundaries
- Hydrocarbon sumps - In the event of an environmental spill this sump is purpose built to contain it. See photo below for more details. McIntyre’s and Broadwater are the only two compounds where the hydrocarbon socks are still in use.
- Rock outlets for downpipes.

Appendix 3. Iluka Compound

Appendix 4. Broadwater Compound

Appendix 5. McAndrews Lane

Appendix 6. McIntyre’s Lane
6. IMPLEMENTATION OF SAFE WORK METHOD STATEMENTS

<table>
<thead>
<tr>
<th>SWMS associated with CBC works</th>
<th>Y/N</th>
<th>Details attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>An up to date register of SWMS listing, all current SWMS is maintained in CBC’s U drive. Where applicable these SWMS identify environmental risks and the controls being implemented. Copies of individual SWMS are not submitted but are maintained on site.</td>
<td>Y</td>
<td>N/A</td>
</tr>
</tbody>
</table>

7. DECLARATION

I confirm that in accordance with Clause 299 WHS Regulation 2017 that all SWMS comply with the WHS Regulation 2017 and their implementation is being monitored by the Principal Contractor to ensure environmental compliance.

Name: Tara Rowan

Position: WHS Coordinator

Date: 17/08/18

Signed: Tara Rowan
## 8. APPENDICES

### Appendix 1. CBC SDS Register

<table>
<thead>
<tr>
<th>Compound</th>
<th>Company</th>
<th>Substances Hazardous</th>
<th>Expiry</th>
<th>Status</th>
<th>Issue</th>
<th>Exposure</th>
<th>Brand</th>
<th>Like</th>
<th>Additive</th>
<th>Water</th>
<th>Misuse</th>
<th>Toxic to</th>
<th>Non-Vol</th>
<th>Re-suse</th>
<th>Used</th>
<th>Reven</th>
<th>Notes</th>
</tr>
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</table>

*CBC SDS Register Pacific Complete*
Appendix 2. Spill Response Kit Instructions and Spill Response Procedure that are located inside the bins.
SPILL STATION SPILL RESPONSE

Spill Stations are designed to absorb and contain spills of hazardous liquids. Spill Stations should be located in areas where hazardous liquids are used, stored or handled and staff should be trained in their use.

Spill Response Procedure

- Wear appropriate Personal Protection Equipment (PPE) before contact with any hazardous substance (consult MSDS).
- If it is safe to do so, shut off or block the source of the spill.
- Ensure that spills are prevented from entering stormwater and drainage systems, creeks, culverts or dams.
- If the spill is spreading or has occurred on sloped ground use Sukerup booms to contain the contaminated area.
- Tread down boom/s carefully to maximise contact area.
- For spills on water use loose Sukerup Organic or Sukerup hydrocarbon specific absorbents.
- Apply Sukerup Organic or Sukerup pads to the spill surface and allow time for the spill to be completely absorbed. If the liquid is especially viscous, work absorbent through with broom, brush or shovel.
- Once the spill has been completely absorbed, place used Sukerup in the Contaminated Waste bags provided and seal with the ties.
- Report spill and cleanup activities to the appropriate supervisor/manager.
- Restock Spill Station with only quality Sukerup absorbents manufactured by Spill Station Australia.

IMPORTANT

If a spill occurs that threatens or harms the environment, you must tell the EPA or your local council as soon as you can after you become aware of it.

For a large scale, hazardous spill call the Fire Brigade immediately.

Spill Station Australia endeavours to provide the appropriate and most effective spill control products available. However since Spill Station Australia has no control over the application or maintenance of these products, they carry no warranty express or implied. These instructions are intended as a guide only and, as such, do not constitute legal advice. Dispose of used absorbent in a manner appropriate to the substance absorbed and in accordance with local, state and federal regulations. Consult your council or the EPA for your local waste disposal options.

Copyright © Spill Station Australia P/L 2002.
Spill Station Australia, PO Box 6153, Wetherill Park NSW 2164. Tel: (02) 9725 5640

Appendix 4. Broadwater Compound
Appendix 5. McAndrews Lane
Appendix 6. McIntyre's Lane
Appendix 7. Tyndale

Tyndale - Erosion & Sediment Control Plan
OPERATIONAL

Notes:
1. Retain vegetation to clean water flow paths. Ensure flagged off as no areas during vegetation clearing.
2. 0.5m compacted earth bund to perimeter of hardstand.
3. Geotextile lined Rock Outlet through bunds at locations identified.
4. Shape or cross drain hardstand entrances to ensure water is diverted toward sumps as indicated.

Legend
- Earth Bund
- Rock Outlet
- Clean Water Diversion
- Flow Direction
- Existing Culvert
- Rock Check
- Sandbag Check

Plan certified by:
Name: David Howley
Signature: [Signature]
Certification: [2383]
Date: 16/08/2017