

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



Document control:

Document: Collector Wind Farm Pollution Incident Response Management Plan (PIRMP)
Date: 27 Feb 2023
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Revision History:

Version	Revision Date	Comments	Approved
1.4	8 June 2022	Updated evac. maps	Paul McDonald
2	27 Feb 2023	Major review following C10 audit	Paul McDonald

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Appendix A – Site Emergency Contacts

1.0 Purpose of this Document

The purpose of this document is to detail the pollution incident response management plan for the Collector Wind Farm, to comply with Section 5.7A of the Protection of the Environment Operations (POEO) Act:

Protection of the Environment Operations Act 1997 No 156

Part 5.7A Duty to prepare and implement pollution incident response management plans

153A Duty of licence holder to prepare pollution incident response management plan

The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

153B EPA may direct other persons to prepare pollution incident response management plan

- (1) The EPA may, in accordance with the regulations, require the occupier of premises at which industry is carried out to prepare a pollution incident response management plan that complies with this Part in relation to activities at the premises.
- (2) A person must not fail to comply with such a requirement.
- (3) The regulations may make provision for or with respect to:
 - a) the class or classes of premises, or industries carried out at premises, that may be the subject of a requirement to prepare a pollution incident response management plan, and
 - b) the circumstances in which some or all premises within those classes may be the subject of a requirement to prepare a pollution incident response management plan.

153C Information to be included in plan

A pollution incident response management plan must be in the form required by the regulations and must include the following:

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

153D Keeping of plan

A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection

licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.

153E Testing of plan

A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.

153F Implementation of plan

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

There are penalties associated with breaches of the above.

2.0 Scope

The scope of this management plan comprises the Pollution Incident Response Management Plan (PIRMP) for environmental pollution generated at the Collector Wind Farm (CWF).

3.0 Definitions

Pollution Incident - An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

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

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs, and

Loss - the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

4.0 Relevant Legislation

- Protection of the Environment Operations Act 1997
- Protection of the Environment (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012

5.0 Relevant Responsibilities

The personnel detailed in Table 1 are responsible for the PIRMP.

Table 1 PIRMP responsibilities:

Activity	Person	Position	Company
Activating the plans and managing the response	Eduardo Alexandre dos Santos	O&M Supervisor, CWF	Vestas
Notifying and coordinating relevant authorities	Eduardo Alexandre dos Santos	O&M Supervisor, CWF	Vestas
Implementation and management of this document	Paul McDonald	Site Manager	Ratch Australia

6.0 Records Management

A copy of all pollution incident response records, as well as the PIRMP will be retained on site with the EPL.

A copy will also be saved electronically.

Records will be made available to EPA officers and any person responsible for the PIRMP.

7.0 Management Protocol

The following section outlines the management procedures for pollution incident response management. The Protocol focusses on three sections:

- 1) Eliminating and/or Avoiding Generation of Pollution
- 2) Management of Pollution Incidents
- 3) Improving and Reviewing the Pollution Incident Response Management Plan

7.1 Environmental Impact & Hazard Register

To effectively plan for a pollution event, a register of environmental hazards grouped according to the area of environmental impact is detailed in Table 2. By identifying these hazards ahead of time, mitigation measures can be identified and implemented through site procedures to minimise the risk of a pollution event occurring.

Table 2 Collector Wind Farm Environmental Impact and Hazard Register

Key environmental hazards		Risk			Mitigation measures	Revised risk		
		L	C	R		L	C	R
Air Quality								
1.	Excessive dust emissions	Possible	Minor	Low	<ul style="list-style-type: none"> ▪ Speed restrictions on roads ▪ Provide training and toolboxes to team members 	Possible	Minor	Low
2.	Health issues off site	Very Unlikely	Minor	Low	<ul style="list-style-type: none"> ▪ As above (1) 	Very Unlikely	Minor	Low
Groundwater								
1.	Groundwater contamination	Rare	Serious	Low	<ul style="list-style-type: none"> ▪ Monitor for interception ▪ Store, handle, disposal and transport dangerous goods, hazardous waste and Petro hydrocarbons in accordance with Australian Standards ▪ implement oil & fuel spillage controls ▪ Provision of adequate spill kits and training on use 	Rare	Serious	Low
Surface water								
1.	Discharge of sediment	Unlikely	Moderate	Low	<ul style="list-style-type: none"> ▪ Monitor site conditions and existing drainage ▪ Manage & maintain site drainage systems in good condition 	Unlikely	Moderate	Low

2.	Discharge of hazardous materials	Rare	Severe	Low	<ul style="list-style-type: none"> Store, handle, dispose and transport dangerous goods in accordance with relevant Australian Standard Undertake regular audit of the storage areas with a continuous improvement action plan for all issues identified Develop & implement spill controls Ensure adequate spill kits are available and provide training for effective use Appropriate location of hazardous materials storage areas to prevent uncontrolled discharges 	Rare	Serious	Low
Ecology								
2.	Damage to native fauna	Unlikely	Serious	Rare	<ul style="list-style-type: none"> Contact local wildlife care group for distressed or injured fauna Maintain low speeds in vehicles Implement Bird and Bat Management Plan 	Rare	Serious	Low
Land								
1.	Spill of liquid fuel, oils, chemicals	Possible	Severe	Medium	<ul style="list-style-type: none"> Store, handle, dispose and transport dangerous goods in accordance with relevant Australian Standard Undertake regular audits of the storage areas with a continuous improvement action plan for all issues identified Develop & implement spill controls Ensure adequate spill kits are available and provide training for effective use Appropriate location of hazardous materials storage areas to prevent off-site discharges 	Unlikely	Significant	Low
Noise								
1.	Operational noise	Unlikely	Moderate	Medium	<ul style="list-style-type: none"> Where required monitor and mitigate accordingly Maintain equipment in accordance with schedules Manage community engagement and proactively deal with complaints 	Unlikely	Moderate	Low

7.2 Pollutant and Safety Equipment Information

Legislative requirements under the Protection of the Environment Operations (POEO) Act dictate that the site is to provide information for all pollutants that are used and stored on the site. This information is required as it assists personnel responsible for coordinating spill responses to manage spills more effectively.

This information must be presented as a manifest detailing the pollutants stored at the site, the location of these storage areas, and the safety equipment to be made available at these areas. A Pollution Information Data Sheet (PIDS) has been prepared and includes the following information for each pollutant (Table 3).

- The intended use for the pollutant
- How the pollutant is stored
- MSDS information

- Safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident
- PPE needed to safely manage a spill of the pollutant
- Procedure for cleaning up a spill of the pollutant.

In order to ensure the currency and reliability of the information in the PIDS, the information should be reviewed and updated on a monthly basis.

Table 3: Pollutant Information Data Sheet

Pollutant	Storage location	Current MSDS held - Yes/No	Emission control equipment ⁽¹⁾	PPE ⁽¹⁾	Spill clean-up method
Fuel	Dedicated hazardous storage facility in O&M Compound	Yes	Bunded storage area Provision of spill kits	PVC gloves, safety glasses, goggles, long pants, long sleeves, ventilation, steel capped boots	<p>Large Spill</p> <ol style="list-style-type: none"> 1) In the case of large spills contact relevant personnel 2) Stop leak without risk. 3) Move containers from spill area. 4) Approach the release from upwind 5) Prevent entry into sewer, water courses, basements, or confined areas. 7) Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation. 8) Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor 9) Contaminated absorbent material may pose the same hazard as the spilt product 10) In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment. Use of hydrophobic absorbent materials 11) Recover product from the surface <p>Small Spill</p> <ol style="list-style-type: none"> 1) Stop leak without risk. 2) Move containers from spill area 3) Absorb with an inert material and place in appropriate waste disposal container. 4) Use spark-proof tools and explosion-proof equipment. 5) Dispose of via a licensed waste disposal contractor.

Lubricants	Dedicated hazardous storage facility in O&M Compound	Yes	Bunded storage area Provision of spill kits	PVC gloves, safety glasses, goggles, long pants, long sleeves, ventilation, steel capped boots	<p>Large Spill</p> <ol style="list-style-type: none"> 1) In the case of large spills contact relevant personnel 2) Stop leak without risk. 3) Move containers from spill area. 4) Approach the release from upwind 5) Prevent entry into sewer, water courses, basements, or confined areas. 7) Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place into a container according to local legislation 8) Use spark-proof tools and explosive proof equipment. Dispose of via a licensed waste disposal contractor 9) Contaminated absorbent material may pose the same hazard as the spilt product 10) In the case of spillage on water, prevent the spread of product by the use of suitable barrier equipment. 11) Recover product from the surface <p>Small Spill</p> <ol style="list-style-type: none"> 1) Stop leak without risk. 2) Move containers from spill area 3) Absorb with an inert material and place in appropriate waste disposal container. 4) Use spark-proof tools and explosion-proof equipment. 5) Dispose of via a licensed waste disposal contractor.
Vehicle fluids	Dedicated hazardous storage facility in O&M Compound	Yes	Bunded storage area Provision of spill kits	PVC gloves, safety glasses, goggles, long pants, long sleeves, ventilation, steel capped boots	<p>Accidental Release Measures</p> <ol style="list-style-type: none"> 1) Contaminated area must be clearly marked or cordoned off to restrict access. 2) Protective clothing should be worn when cleaning up a sewage spill 3) If the spilled material can't be recovered using hand tools, a commercial vacuum/pump truck will be called to remove all visible liquid and solid material. 4) When the area is visibly clean, a hydrated lime should be applied to the spill area to disinfect.

				<p>5) If a major spill has occurred hydrated lime should be applied to the area in place of chlorine bleach</p> <p>6) Enough hydrated lime should be applied to raise the pH to at least 12. By raising the pH to 12 for at least 1 hour, the area will be disinfected.</p> <p>7) Because lime is a caustic material, access to the area treated with lime must be restricted during the disinfection period.</p> <p>8) The area will be barricaded until tests determine the site to be safe</p>
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7.3 Emergency Response Maps

Site Access/Egress

The following figure shows the location of the site entrance and O&M Compound in relation to the main points of access/egress to site from surrounding public roads.



Figure 1. Site access/egress.

O&M Compound - Emergency Response Map

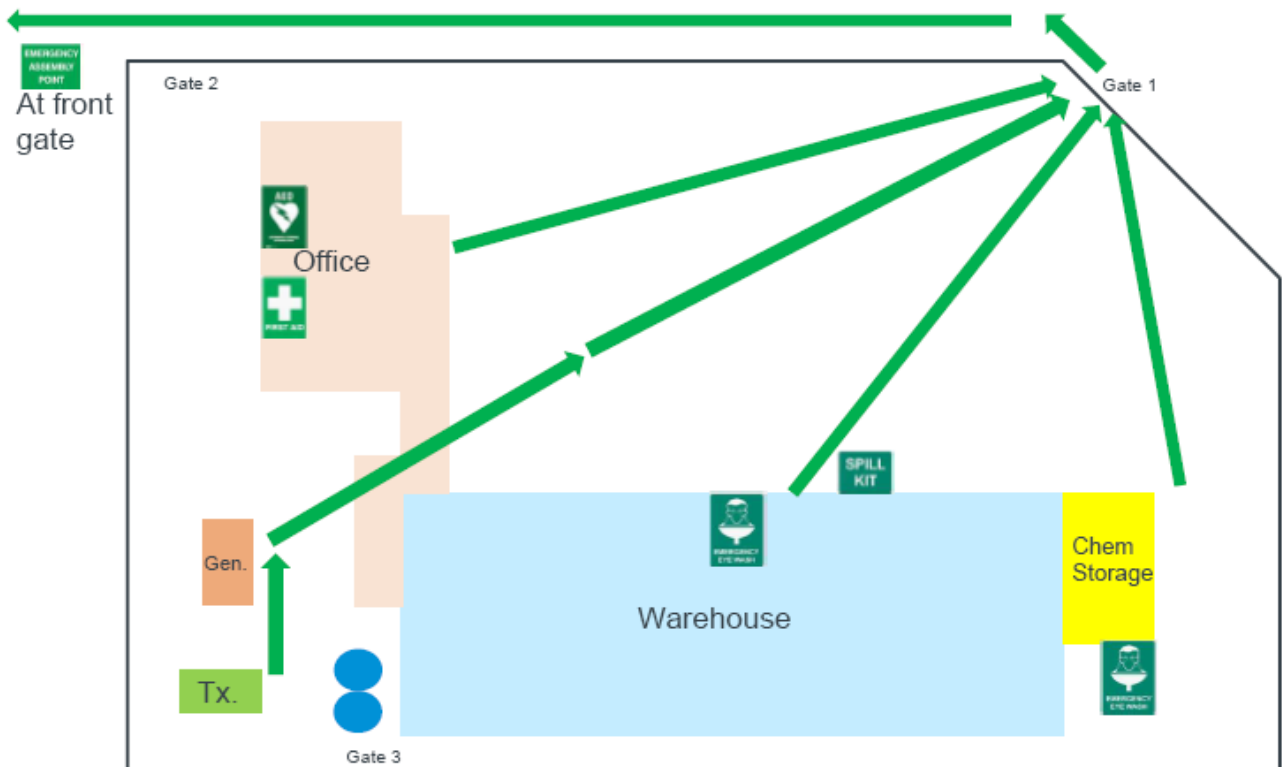


Figure 2 – O&M Compound Layout Map / Emergency Assembly Areas

7.4 Pollution Incident Response Management Plan

If it is suspected that an incident may cause material environmental harm the Pollution Incident Management Response Plan will be executed. This plan is based on seven phases:

1. Assess
2. Stop
3. Contain
4. Notify
5. Mitigate
6. Clean-up
7. Review

Details of the requirements and responsibilities for each phase are explained below.



ASSESS

- **Identify the severity, risks, and extent of the incident:**
 - What is the substance emitted?
 - What are its properties?
 - Is there a risk to health and safety?
 - Do you have the necessary PPE to manage the emission?
 - What is the nature of the surrounding area?
 - What is the volume of the emission?
- **If the emission has the potential to cause material harm, execute the next phase of the plan (Notify)**



STOP

- **Stop the source of the emission**
- **Ensure that necessary emergency materials are on hand to control larger emissions**
- **Examples:**
 - Restore drums to upright position
 - Close open valve causing spill
 - Isolate feed line
 - Plug the leak
 - Construct an earthen bund



CONTAIN

- Implement environmental controls downstream of pollution source to prevent/minimise further impact to receiving environment
- Example:
- A Fuel spill discharged into quarry dam. Mitigation controls to ensure this spill is not spread may include closing of weirs, or outlets, ensuring water cart does not fill from affected dam etc.



NOTIFY

Contact key individuals

- Individuals responsible for activating and managing plans (nominated site representatives)
- Individuals authorised to notify and coordinate relevant authorities (nominated site representatives)

Contact Relevant Authorities

- Firstly, call 000 if the incident presents an immediate threat to human health or property.
- 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
- EPA
- Ministry of Health via the local Public Health Unit
- WorkCover Authority
- the local authority if this is not the ARA
- Fire and Rescue NSW

Specific contact details are provided in appendix A



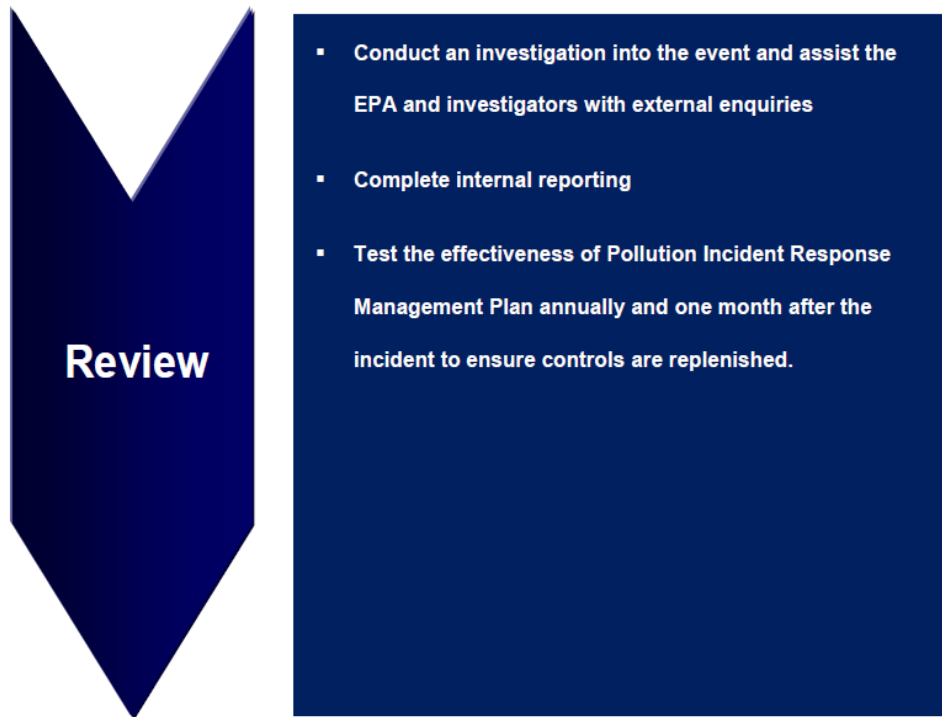
MITIGATE

- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission from spreading.
- When an emission is on a hard surface use appropriate absorbent materials ie absorbent granules or sand
- The main priority is to prevent the emitted material from discharging off site



CLEAN UP

- Clean up and remedial actions to restore the environment
- Disposal of pollutants in accordance with regulations
- Refer to PIDS or for clean-up information



7.5 Communication Strategy

It is a legal requirement of the Protection of the Environment Operations (POEO) Act, to notify key stakeholders in neighbouring properties that may be affected by an incident.

Communicating with neighbours and the community in the event of a spill is vital as they have a right to know about any spill that can potentially lead to material harm to their properties or themselves. Appendix C provides the Communications Strategy for the PIRMP.

7.6 Staff Training

Training is provided to staff on their roles and responsibilities to prevent, and act during, a pollution incident. This is undertaken through inductions, toolboxes, prestart and incident reviews.

Staff are trained in how to use spill response kits.

8.0 Continual Improvement

This plan will be tested and updated on an annual basis and within one month of an incident.

To complete this requirement a Pollution Incident Response Test Checklist shall be implemented. The checklist includes the major elements of the plan that require testing:

- Contact numbers
- Evacuation drills
- Desktop assessment
- Environmental controls & PPE

Desktop assessments require site personnel, responsible for testing the plan, to select a scenario from the hazard and impact register (Table 2) and ensure that all the required controls for the scenario are in place. During the desktop assessment environmental control and PPE equipment supplies should be inspected to ensure that they are functional and that there are enough materials to ensure that emissions relating to the scenario can be controlled effectively and safely.

Appendix A – Site Emergency Contacts

Emergency contact	Name	Contact
Site Supervisor	Eduardo Alexandre dos Santos	0400 578 588

Service contact	Name	Contact
Service Technician	Peter Beckman	0436 682 751
Service Technician	John Lamarra	0436 678 574
Site Manager	Nick Warren	0457 047 799
Principal Representative	Paul McDonald (RAC)	0428 342 068

Emergency contact	Contact
Ambulance Service Goulburn Ambulance Station: 18 Clifford Street Goulburn	000 (02) 4822 1822
NSW Fire and Rescue Fire & Rescue Goulburn 157-161 Bourke Street Goulburn	000 (02) 4822 1608
Rural Fire Service Goulburn Rural Fire Service 82- 88 Combermere Street Goulburn	000 (02) 4822 2900
Police Service Goulburn Police Station 274 Sloane Street Goulburn	000 (02) 4824 0799
Goulburn Base Hospital 130 Goldsmith Street Goulburn NSW 2580	(02) 4827 3111
Poisons Information Centre	13 11 26
Goulburn Medical Clinic	(02) 4823 0200
Snake Handler	0400 734 225
WorkSafe Authority	13 23 60
Energy Safe Authority – Electrical Emergencies National Response Centre	1800 000 922
Environment Protection Authority – EPA (NSW)	131 555 (02) 9995 5000