Emergency Response Management Plan

SMCSWSSJ-JHL-WSS-HS-PLN-000512

Document and Revision History

Document Details	
Title	Emergency Response Management Plan
Client	Sydney Metro City & Southwest
Client reference no.	SMCSWSSJ-JHL-WSS-HS-PLN-000512
JHLOR JV contract no.	R44

Revisions

Revision	Date	Description	Prepared by	Reviewed by
4	13/12/2019	Updated after AD review	A M Hawkins	A. Deacy
5	09/04/2020	Include COVID-19 requirements for social separation	B. Lockwood	A. Deacy
6	16/09/2020	Updates to Appendix 17 Pollution Indecent Response Management Plan Update contact details and reviewed for currency	D Keegan B. Lockwood	A Deacy
7	02/08/2021	Incorporate Southwest Metro Corridor scope of work Include references to relevant COVID-19 documentation	B. Lockwood	P. Fields A. Deacy
8	05/11/2021	Incorporate Bankstown Early Works scope of work Rail incident reporting requirements included	B. Lockwood	A. Deacy
9	08/07/2022	Update following annual review of the Pollution Incident Response Management Plan (Appendix 13)	W. Chaudhary/ L.Dobrolot	A. Deacy
10	21/10/2022	Update of Response Teams and Pollution Incident Response Management Plan (Appendix 13)	M. Tayeh/ L.Dobrolot	A. Deacy
11	01/11/2023	Reviewed for currency and updated following annual incident response drill	C. McCallum	P. Mayne
12	18/12/2024	Updated Appendix 16 – PIRMP Test Register	T. Buratti	L. Dobrolot

Management reviews

Review date	Details	Reviewed by	Signature
10/12/2019	Reviewed for currency	A. Deacy	
16/09/2020	Reviewed for currency	B. Lockwood Anthony Deacy	
31/07/2021	Reviewed for currency	B. Lockwood M. Baranowski	
08/07/2022	Reviewed for currency	M. Baranowski	
23/11/2022	Reviewed for currency	A. Deacy	

Controlled: NO Copy no.: Uncontrolled: YES

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Appendix 13: Pollution Incident Response Management Plan (PIRMP)

1. Objectives and Purpose

Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed for the Construction phase of the SWMC Project (the Project) to comply with legislative requirements under the Protection of the Environment Operations Act 1997(POEO Act), the Protection of the Environment Operations (General) Regulation 2009 and the Protection of the Environment Legislation Amendment Act 2011(POELA Act). The PIRMP has been developed in accordance with the Environmental Protection Authority's Environmental Guidelines: Preparation of pollutant incident response management plans (2019). This plan is a mandatory document on all NSW projects issued with an Environmental Protection Licence (EPL) 21147.

Objectives

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority, Sydney Metro and other relevant authorities specified in the POEO Act (such as local councils, NSW Ministry for Health, WorkCover NSW, and Fire and Rescue NSW), and people outside the project who might be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident associated with the construction of the project by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

This document should be read in conjunction with the following JHLOR Management Plans: CEMP, IECMP and RMP.
Sections 1 and 2 of this Plan must be made available on the company's website no later than 14 days after being prepared and approved for issued.

2. Legal and other Requirements

This PIRMP complies with the requirements under the Part 5.7 of the POEO Act 1997 A Duty to Prepare and implement the Plan's POEO (General) Regulation 2009 Part 3A. The requirements under the legislation are supported by the EPA's "Environmental Guidelines: Preparation of Pollution Incident Response Management Plans."

Key areas which this PIRMP covers as outlined within the relevant legislation are included in Table 1.

Table 1: PIRMP Legislative Requirements

Legislation covered under this Plan	Reference POEO Act Part 5.7	Reference
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	Section 7 of Appendix 13
153D	Keeping of plan:	Section 9 of Appendix 13
153E	Testing of plan:	Section 11 of Appendix 13
153F	Implementation of plan:	Section 7 of Appendix 13
POEO (General) Regulation 2009		
98C(a)	Hazard assessment:	Section 5 of Appendix 13
98C(b)	Likelihood Assessment	Section 5 of Appendix 13

98C(c)	Pre-Emptive Action	Section 5 of Appendix 13
98C(d)	Pollutant Inventory Types:	Section 6 of Appendix 13
98C(e)	Pollutant Inventory Quantities:	Section 6 of Appendix 13
98C(f)	Safety Equipment	Section 6 of Appendix 13
98C(g)	Staff Contacts	Section 5 and Section 7 of Appendix 13
98C(h)	Authority Contact:	S4.3 and 5.2 of this IECMP
98C(i)	Early Warnings Neighbours:	Section 6 and Section 8 of Appendix 13
98C(j)	Staff Safety:	Section 12 of this IECMP
98C(k)	Maps location of pollutants:	Appendix 14 of this IECMP
98C(m)	Training of Staff	Section 10 of Appendix 13
98C(n)	Timing of Testing:	Section 12 of Appendix 13/ Appendix 15
98D(1)	Availability of the PIRMP	Section 9 of Appendix 13

3. Roles, Responsibilities and Contact Details

The roles and responsibilities of key JHLORJV Personnel with respect to pollution incidents are as follows in Table 2.
For contact details, refer to section 5.2 of IECMP.

Table 2: Roles and Responsibilities

Project Director	• Ensure that PIRMP is prepared and implemented • Review and approve PIRMP • Ensure that sufficient resources are available for managing environmental incidents • Notify the Environmental Representative and Sydney Metro Representative on any environmental incidents that occur • Participate and / or review simulated Emergency Exercises

Table 2: Roles and Responsibilities	
Project Environment Manager	• Be fully conversant with the requirements of the Plan, the CEMP and the Communications Requirements in Section 8 • Be responsible to notify relevant stakeholders and government authorities • Ensure the spill response flow chart, emergency contact numbers and details and any other bulletin of information pertaining to the PIRMP management is placed on noticeboards. • Educate supervisory personnel in accordance with plan requirements, statutory obligations and relevant procedures • Conduct a tool box talk re the requirements of the PIRMP • Assist with advice, reporting and response process to on-site personnel • Ensure the PIRMP is made available to staff responsible for implementing the PIRMP and authorised officers under the POEO Act • Assist in the notification of pollution incidents to the relevant authorities • Assist in communicating with neighbours and the local community about the PIRMP • Understand operation and location of spill kits and how to use emergency equipment • Complete Incident Notification Forms
Safety Manager	• Be responsible to Contact Emergency Services (Police. Fire Brigade Ambulance) • Stop entry of incoming vehicles if required • Attend to the environmental incident • Contain the environmental incident • Assess and evaluate an environmental incident • Evacuate site staff and personnel to assigned assembly point if required • Provide necessary assistance to the external Emergency Services as required (Police, Fire Brigade or Ambulance). • Ensure the requirements of the PIRMP are communicated in daily pre-starts • Understand operation and location of spill kits and how to use emergency equipment
Emergency Response Co-ordinator	• Raise the alarm for an emergency response • Contact / communicate with emergency services • Coordinate emergency response and monitor the effectiveness; • Communicate with area / floor wardens • Coordinate the activities of all personnel in the emergency response team and make further directions as required by the situation; • Arrange deputy when absent; • Coordinate training requirements for the emergency response team and all other site personnel.
Assistant Emergency Response Co-ordinator (Area Warden- Deputy Senior)	• Assume the responsibilities normally carried out by the emergency response coordinator if the emergency response coordinator is unavailable and otherwise assist as required

Table 2: Roles and Responsibilities	
First Aid Attendant (Details provided on Safety notice board displayed at project office entrance and within office compound)	• Attends to the environmental incident and administers first aid • Assists the Project Director and Project Environmental Manager during evacuations • Maintains emergency equipment and spill kits • Notifies Site Supervisor of incidents • Understand operation and location of spill kits and how to use emergency equipment
Traffic Controller	• Assists the Emergency Response Coordinator during evacuations • Control traffic • Control access to site and stop entry of incoming vehicles.
Workers / Subcontractors / Visitors	• Report any incident immediately to the Site Supervisor • Follow all instructions by site Emergency Coordinator/managers

4. Environment or Pollution Incident Definitions

As outlined within the POEO Act, the definition of a pollution incident is: '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.'

Additional important terms used in this PIRMP are outlined below.

Emergency Incident:

Sudden, unexpected, or impending situation that may cause injury, loss of life, damage to the property, and/or interference with the normal activities of a person or firm and which, therefore, requires immediate attention and remedial action act or omission that results in pollution.

Material Harm to the Environment: –

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), and

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

5. Risk Classification, Likelihood Assessment and Pre-emptive Actions

All environmental pollution issues have been assessed in accordance with table 3 below:

Risk Assessment Rankings: **>17 = Extreme** **10 - 16 = High** **5 - 9 = Medium** **1 - 4 = Low**

Table 3 : Pollution Risk Classification

Aspect	Potential Environmental Impact	Initial Risk Rating P X C = Risk	Control Measures to Decrease likelihood	Residual Risk Rating P X C = Risk	Management of Residual Risk
Water Quality, Erosion & Sedimentation					
Sediment laden runoff from construction works leaving site.	Degradation of local watercourses. Increased turbidity in local water ways	2 3 6	Control Measures as per Soil and Water Management Plan and any Erosion and Sediment Control Plan to be	1 3 3	Undertake regular inspections of work areas pre, during and after works to

Aspect	Potential Environmental Impact	Initial Risk Rating			Control Measures to Decrease likelihood	Residual Risk Rating			Management of Residual Risk
		P	X C =	Risk		P	X C =	Risk	
	resulting in impact on aquatic life. Fines for sediment escaping site.				implemented. Install stormwater drainage protection within the project area. Ensure measures are inspected and maintained as the works progress and also prior to and post rainfall events. Provide training and awareness on the need to prevent pollution. Relevant people to undertake Erosion and Sediment Control training.				ensure controls are in good condition.
Stockpiling of vegetation and topsoil.	Wind and water erosion causing weed/seed dispersion offsite. Location of stockpiling next to waterways causing weeds/seeds to disperse from construction site.	2	3	6	Develop Environmental Control Maps to show stockpile areas. Utilise appropriate locations for stockpiling (away from waterways, watercourses, drains where feasible and reasonable). Designated vegetation stockpiling areas. Minimise stockpiling / Use temporary stockpiling Cover stockpiles if left for extended periods.	1	3	3	Implement stockpile controls prior to the work commencing. Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition.
Non-compliant water from construction works discharged from site	Non-compliant water entering stormwater system waterways (i.e. polluting - not compliant with discharge criteria).	2	3	6	Environmental Manager/representative to approve all water discharges from site. Induction and toolbox talks Toolbox training on site procedures for water discharge Educate site staff on licence conditions and consequences of prosecution	1	3	3	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition.
Works with the potential to intercept Ground water table	Ground water entering excavations Without appropriate safeguards onsite could lead to ground water contamination	3	3	9	Induction and toolbox talks Toolbox training on site procedures for water discharge Educate site staff on licence conditions and consequences of prosecution Environmental Manager/representative to approve all water discharges from site	1	3	3	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Encountering groundwater unlikely in remaining construction scope, no deep excavation or underbore activities anticipated
Groundwater	Ground water entering excavations	2	2	4	Implement the controls within ERAP 2 - Groundwater	1	2	2	Undertake regular inspections of work

Aspect	Potential Environmental Impact	Initial Risk Rating P X C = Risk	Control Measures to Decrease likelihood	Residual Risk Rating P X C = Risk	Management of Residual Risk
	Without appropriate safeguards onsite could lead to ground water contamination Spreading contamination via groundwater management Settlement due to dewatering		Induction and toolbox talks Toolbox training on site procedures for water discharge Educate site staff on licence conditions and consequences of prosecution		areas pre, during and after works to ensure controls are in good condition.
Waste					
Waste disposal during construction.	Incorrect disposal of waste, further costs incurred for classifications and disposal, fines may be issued.	3 2 6	Implement the controls within the Waste Management Plan. Identify opportunities to incorporate recovered materials into the permanent works. Provide facilities on site for source separation and recycling. Ensure accurate waste records are retained. Removal of wastes from the site would only be undertaken by a licensed contractor as required by the POEO Act and with appropriate approvals, if required, for contaminated materials, etc. All material to be recovered off-site to be appropriately classified in accordance with the Resource Recovery Exemptions. All material that requires off-site disposal to be appropriately tested and classified against the Waste Classification Guidelines (NSW EPA, 2014)	2 2 4	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Monitor and ensure reporting of all movements of waste form the worksite
Earthworks spoil disposal.	Incorrect classification of waste (spoil) resulting in incorrect / illegal disposal/re-use.	3 2 6	Inductions, toolbox talks and training on recycling facilities and waste segregation practices. Separation of waste on site. Tracking of disposal processes. All contamination hotspots would be clearly marked in the field (where possible). Hot spots will be shown within contamination mapping and will be included in the Permit to Disturb process.	2 2 4	Regular inspections of work areas Monitor and ensure reporting of all movements of waste form the worksite
Washout of concrete in undesignated areas.	Sediment laden/alkaline water polluting surrounding	3 2 6	Concrete washout areas clearly marked on Environmental Control or	1 2 2	Regular inspections of concrete washout areas and controls

Aspect	Potential Environmental Impact	Initial Risk Rating			Control Measures to Decrease likelihood	Residual Risk Rating			Management of Residual Risk
		P	X C =	Risk		P	X C =	Risk	
	stormwater system / watercourses.				ESCP Maps and delineated. Inductions on designated concrete washout areas. Subcontractor's agreements to include project compliant waste management principles.				
Contamination									
Management of contaminated or untreated materials	Non-compliant material and contaminated water entering surrounding waterways. Decrease in health of nearby ecosystems.	3	3	9	Implement contamination management procedures and protocols from within Soil and Water Management Plan. Identify any contamination hotspots and incorporate procedures for these locations into construction documentation. Develop unexpected finds procedures. Induct personnel on unexpected finds procedure.	1	3	3	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Monitor and ensure reporting of all movements of waste form the worksite Encountering contaminated or untreated material unlikely due to remaining construction scope.
Potential for discovery of unexpected contaminated spoil during construction.	Health effects resulting from airborne contamination, e.g. asbestos. Complaints received from odours released during excavations. Classification of spoil is changed and disposal options altered, costs incurred associated with disposal of higher classification of waste.	2	3	6	If contaminated soil is encountered, all works are to stop in the vicinity of the find and investigations commence. Induct personnel on location, type, nature, concentration of contaminants on site if found.	1	3	3	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Complete regular toolbox talks on how to manage unexpected finds.
Encountering asbestos / contaminated material on site.	Transfer of material into previously uncontaminated area (outside work site) causing new contamination.	3	3	9	Inspections of excavated and filled surfaces would be made during construction to determine the presence of visible asbestos. Conduct further site investigations to determine the presence and extent of contamination prior to construction works commencing Contaminated soils would not be stockpiled on the structural fill layer or formation layers to avoid cross contamination.	1	3	3	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Complete regular toolbox talks on how to manage unexpected finds. Encountering contaminated material unlikely due to remaining construction scope.

Aspect	Potential Environmental Impact	Initial Risk Rating P X C = Risk	Control Measures to Decrease likelihood	Residual Risk Rating P X C = Risk	Management of Residual Risk
Hazardous Materials					
Storage of hazardous substances, leaking plant and equipment and spillage from refuelling.	Localised ground contamination / pollution of stormwater and requiring clean-up and/or receiving fines. Risk of igniting volatile substances. Unauthorised access to site / potential vandalism/damage leading to pollution.	3 3 9	Induction, toolbox talks and training on appropriate handling and storage of liquids. All storm water drains should be identified prior to works and protection installed. Storage areas to be away from sensitive areas and appropriately bunded. SDS approved prior to bringing hazardous substances on site including risk assessment. Plans showing storage locations and associated controls e.g. spill kits, etc. (Environmental Control Maps). Training in use of spill kits. Contingency plans would be developed to deal with any spills which might occur during construction. Clearly label containers. Regular auditing and inspection of storage areas and materials. Make storage areas restricted access areas. Reduce/eliminate need for hazardous substances. Ensure all work sites are secure before leaving the site. All liquids i.e. paint etc. are to be securely locked away at the end of each day.	1 3 3	Regular inspections of storage areas.
Fuel contaminated runoff from construction works leaving site	Fuel contaminated runoff entering stormwater or waterways (i.e. polluting - not compliant with discharge criteria).	3 3 9	All storm water drains should be identified prior to works and controls implemented. Appropriate bunding/storage of substances. Toolbox on site procedures for sediment controls and chemical storage. Educate site staff on project conditions and consequences of prosecution.	1 3 3	Regular inspections of works site to ensure all controls are in good health and working.
Air Quality					
General construction works; site establishment, excavations, piling	Dust activity in close proximity to residential and commercial premises, complaints received.	3 2 6	Implement the controls within the Air Quality Management Plan Toolbox training on Dust and Air Quality Management. Provide dust mitigation	1 2 2	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition.

Aspect	Potential Environmental Impact	Initial Risk Rating P X C = Risk	Control Measures to Decrease likelihood	Residual Risk Rating P X C = Risk	Management of Residual Risk
			measures through water sprays/misting as required. Cover stockpiles that are not to be worked on for a period of greater than 10 days. Erosion and Sediment Control Plans approved before works commence. Controls are then reviewed for maintenance.		Due to stage of works, majority of site has been stabilised with permanent ground cover including hardstand and mulch/ revegetation. Minimal stockpiling areas remaining, reducing probability of air quality impacts.
Exhaust from plant and equipment.	Emissions resulting in air pollution.	3 2 6	Inductions and toolbox training on Dust and Air Quality Management. Well maintained plant/ equipment and pre-start checks and servicing. Non-complaint vehicles removed from site / repaired.	2 2 4	Review plant check list prior to operating on site. Undertake verification checks a required.
Abrasive Blasting Activities	Uncontrolled/uncontained airborne fines from abrasive blasting process resulting in air pollution	3 4 12	Inductions and toolbox training on Dust and Air Quality Management. Encapsulation on abrasive blasting activities Monitoring and inspections of encapsulation	0 2 0	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Abrasive blasting activites not anticipated due to remaining construction scope
Extensive bushfires beyond the Greater Sydney Region					
Acid Sulphate Soils					
Disturbance of Potential Acid Sulphate soils and Actual Acid Sulphate Soils during excavations.	Mobilisation of metals within runoff to levels toxic to natural systems. Release of acidic runoff.	2 2 4	Assess risk for acid sulphate soils, and if the risk is determined to be high then implement the Acid Sulphate Soils Procedure. Awareness training in the identification and management of ASS. Provide containment and treatment facility on site. Ensure ASS material is left under the water table, disposed off-site or appropriately treated in a bunded area with sump.	1 2 2	Undertake regular inspections of work areas pre, during and after works to ensure controls are in good condition. Encountering unexpected PASS or ASS unlikely in remaining construction scope, no deep excavation or under bore activities anticipated

6. Inventory of Pollutants

As per the requirements of clause 98c(1)(d) and (e), Laing O'Rourke have developed an inventory of potential pollutants that will be kept on the premises. This includes the potential pollutant, approximate quantity, location of storage, current controls and PPE required in the event of an incident. This is listed in Table 4 and will be updated progressively as part of the PIRMP reviews.

Locations of potential hazards (where relevant) are also shown on the Environmental Control Map in Appendix 14.

Hazard	Approximate Quantity	Location	Current / Proposed Control	PPE required in the event of an incident
Diesel/Petrol	4,500L	Machinery and Vehicles. Within secured container at JHLORJV Canterbury compound and South Terrace Bankstown	Jerry cans, Double bunded tank Spill Kits	Spill Kit, gloves, masks, goggles, disposable overalls, fire extinguishers
Asbestos	N/A	Site wide, medium risk along the south-west metro alignment	Training on asbestos awareness Use of licensed contractor's. Unexpected finds protocol	Masks, goggles, disposable overalls Specialist removal assistance
Oil	20L	Machinery and Vehicles JHLORJV Canterbury compound	200L bunded barrels, appropriate chemical separation	Spill Kit, gloves, masks, goggles, disposable overalls Fire Extinguishers
Petrol	60L	Machinery and Vehicles. Refuelling area	Bunded container, appropriate chemical separation	Spill Kit, gloves, masks, goggles, disposable overalls, fire extinguishers
Other Chemicals	100L	Bunded chemical storage container	Bunded container, appropriate chemical separation	Gloves, masks, goggles, disposable overalls, gumboots

7. Implementation and communication Requirements

a. Internal Emergency Notification Protocol

If a pollution incident occurs in the course of an activity on site so that material harm to the environment (within the meaning of Section 147 PEOA) is caused or threatened, the person carrying out the activity must immediately implement any pollution incident management response that was developed to meet the requirement of the POEO Act.

The steps for managing an incident are shown in Table 5.

Table 5: Implementation Steps

Step	Key items	Description

Step 1	Personnel in immediate vicinity of incident stop work immediately and make the area safe and asses the incident. Stop work immediately and make the area safe and contact Site Supervisor and Site Superintendent. Identify and assess incident severity, determine initial incident level and evaluate response. Site Supervisor/Superintendent to notify the Project Director and Environmental Manager.	Assess the incident based on its potential to escalate. Initial assessment needs to assess risk and look at impact on: - Environment - Pedestrians - Community - Local Business - Neighbouring buildings - Traffic - Stormwater drains - Other businesses If the incident is defined as an Emergency, follow procedures in the Incident / Emergency Management Plan and Crisis Management Plan as required.
Step 2	Depending on the severity of the incident, the Project Director and Environmental Manager to notify Emergency Services / Hazmat (as required), Sydney Metro the EPA, and other agencies as required. t	The Project Environmental Manager or Laing O'Rourke/John Holland site staff who have been trained and approved to notify relevant authorities, make contact with the relevant agency being: EPA on 131 555 Ministry of Health (contacts as agreed with NSW Health) WorkCover Authority on 13 10 50 Sydney Council 02 92659333 Fire & Rescue NSW on 1300 729 529 Sydney Water 13 20 90 Notify affected persons in immediate area using Sydney Metro communications strategy
Step 3	Establish command and control	The Project Environment Manager to nominate the required Incident Control Review initial situation analysis and assess and confirm incident category (PIRMP Table 6) Appoint additional resources to assist the Site Superintendent and Project Environment Manager at incident site. If the event is defined as an Emergency, the Roles and Responsibilities are detailed in the JHLORJV Emergency Response Management Plan as required. Manage the incident at site level or escalate to request assistance from relevant authorities
Step 4	Manage the incident Actions to eliminate the immediate risk to	Coordinate the incident at whole Implement Sydney Metro's communications protocols Review and monitor effectiveness of response Review situational analysis and confirm incident category
Step 5	Manage the recovery	Agree recovery objectives Commence debrief procedures Implement close out communications
Step 6	Improvement actions Actions to improve future operations	Debrief following incident in accordance with JHLORJV procedures. Draft Incident Report Update Risk Registers

When notifying authorities that a pollution incident has occurred, the following information must be provided:

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, if known
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 known.

b. External Government Agency Consultation

There is a requirement to notify a pollution incident to regulatory agencies (Section 148) is triggered when there is a risk of 'material harm to the environment'.

Table 6 outlines the external government liaison reporting requirements should an incident occurs.

Table 6: External Government Reporting Requirement

Activity or Event	Environmental Issue or Non-compliance	Low Severity incident	Medium Severity Incident	High Severity Incident
	Report to JHLOR Project Manager and Environmental Manager	**Report to Project Environmental Manager and Sydney Metro**	**Must be Reported to Authorities & Environmental Representative and Sydney Metro**	**Must be Reported to Authorities & Environmental Representative and Sydney Metro**
	Potential event that could result in a future incident.	**Unlikely that material environmental harm has occurred**	**Material harm likely to have occurred**	**Material harm has occurred**
General environmental effects	An occurrence or set of circumstances that presents opportunity for improvement or has the potential to cause or lead to an environmental incident (low, significant, moderate or high severity) or non- compliance if not rectified.	Pollution or degradation which has short-term (less than 3 months) and reversible detrimental effects on the environment and/or community.	Pollution or degradation which has persistent (greater than 3 months) but reversible detrimental effects on the environment and/or community	Pollution or degradation which has or may have irreversible detrimental effects on the environment and/or community
Discharges to water	Unplanned discharge from site to stormwater drains Unplanned discharge from the WTP that that does not meet discharge criteria for receiving waters.	Minor / trivial discharge to waters with negligible impact on environment e.g. discharge contained / removed, no impact on receiving environment	Discharge to waters with Moderate term impact on environment e.g. • Oil spill escapes into storm water or watercourse • Minor pollution of groundwater in localised area(s)	Major and persistent discharge of pollutant to waters, long term impact on water resources e.g. Sediment trap/gross pollutant trap failure Hydrocarbon / chemical
			• Discharge from site or the WTP not in accordance with EPL discharge criteria. • Concrete slurry enters waters	contamination of groundwater or water

Dust emissions to atmosphere	Unplanned discharge from site to atmosphere.	Minor discharge of pollutant to atmosphere e.g. • No visible deposition of dust outside premises • No risk to human or environmental health.	Release of pollutant to atmosphere causes: • Risk to human or environmental health. • Generation of dust causing significant, nuisance or hazard to the community or environment	Major or persistent discharge of hazardous pollutant that involves: • explosion or leak of hazardous gas • possible or actual evacuation of local vicinity • Significant risk to human health or the environment. • Asbestos dust with potential long-term damage to human health
Noise & vibration	Generation of noise outside approved hours & limits Vibration causing property damage Generation of noise or vibration causing community complaints	Generation of noise or vibration causing community complaints	Generation of noise or vibration causing community complaints	Major or persistent generation of noise or vibration causing community complaints
Solids & other wastes	Unapproved waste material leaving the site	Unapproved storage, transport, treatment or disposal of a minor quantity of non-hazardous waste removed to an unlicensed facility	Unapproved storage, transport, treatment or disposal of a significant quantity of non-hazardous waste or minor quantity of hazardous waste easily removed to an approved facility	Unapproved storage, transport, treatment or disposal of a significant quantity of hazardous or non- hazardous waste not easily removed to an appropriate location.

8. Community Notification and Actional Protocol

. The JHLORJV Communications representative will notify the neighbours and community.

The steps when managing an incident are presented in Table 7:

Table 7

Step	Key items	Description
Step 1	JHLOR to list Notifiable Groups	The list of notifiable organisations is to include the following details: a) The name of the company or organisation b) The buildings address and location in proximity to the site c) The name of the organisation or facility's' contact person. d) The contact person's phone numbers (mobile and landline) and e-mail.
Step 2	Evaluate the Environmental Incident	In the event of an incident or emergency being identified, appropriate personnel will implement response procedures or internal protocols.
Step 3	Make the area safe	The intent of considered Incident Response is to negate or contain adverse environmental impacts resulting from an environmental incident (event or occurrence) or emergency (serious, unexpected or dangerous occurrence).
Step 4	Activate the Sydney Metro Communications Protocol	Contact Sydney Metro communications team
Step 5	Make all contacts	Sydney Metro to make all contacts
Step 6	Report of the process	Complete Environmental Incident and Non-Compliance Report (Appendix C)

9. Availability and Privacy

a. Website Information

As a requirement under Clause 98D (1)(2), a copy of this PIRMP document has been uploaded onto the Sydney Metro website at: https://sydenhamstationupgrade.com/sydenhamstationupgrade/

b. Availability and Location of the PIRMP

As a requirement under Clause 98D(1), a copy of this PIRMP document will be located at the site office and on JHLOR project drive. In any event, the availability of this PIRMP will be made available by locating printed copies in the same locations that the Environment Protection License (EPL) is located.

c. Privacy Protection

Where components of the PIRMP are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative plans with such information removed (e.g., contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

10. Training

Under the requirements of clause 98C (2) (e) of the POEO (G) Regulation, training will be provided to ensure the relevant staff and contractors are aware of the key steps to manage an emergency or pollution incident.
The requirements of the PIRMP will be outlined in conjunction with the emergency response procedures in the site induction for all new employees and contractors. A toolbox talk outlining the key components on the PIRMP/emergency response procedures will be presented to all JHLOR staff and contractors as required.

11. Testing

The PIRMP will be tested every twelve months as per the requirement of the POEO (G) Regulation. The testing of the PIRMP is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and that each plan is capable of being implemented in a workable and effective manner.
Testing will need to cover all the components of the PIRMP, including the effectiveness of training.
Plans will be reviewed within one month of any pollution incident occurring in the course of an activity to which a licence relates to assess, in the light of that incident, whether the information included in the plan is accurate and up to date, and that the plan is still capable of being implemented in a workable and effective manner.
The project will implement rehearsals (drills) to check the relevance and adequacy of the procedure, resources and equipment and may include any of the following:

- Inspection of emergency signs, equipment, facilities and readiness;
- Emergency response drills and rehearsals;
- Test response to likely scenarios that could be faced by the project emergency response personnel; and

Appendix 15 provides a PIRMP test register.

Appendix 14 : Potential Pollution Hazards

Item	Reference
Project boundaries	
Indicates areas where chemicals are stored, bunded and/or within containers Chemicals can include: Fuel, concrete cure, bonding agent, hydrochloric acid, paints, oil	
Indicates areas where gas cylinders are stores within cages	
Potential sensitive receivers of Pollution incident	
Spill Kit / Safety equipment / Master Switch	Spill Kit
PIRMP and Emergency plans	
Stormwater Drain	
Chemical direction in case of potential spill	
Stormwater Culvert Flow Direction Dashes line indicates the underground drainage line	

Figure 1: JHLOR Canterbury Office Compound, 15 Close St Canterbury

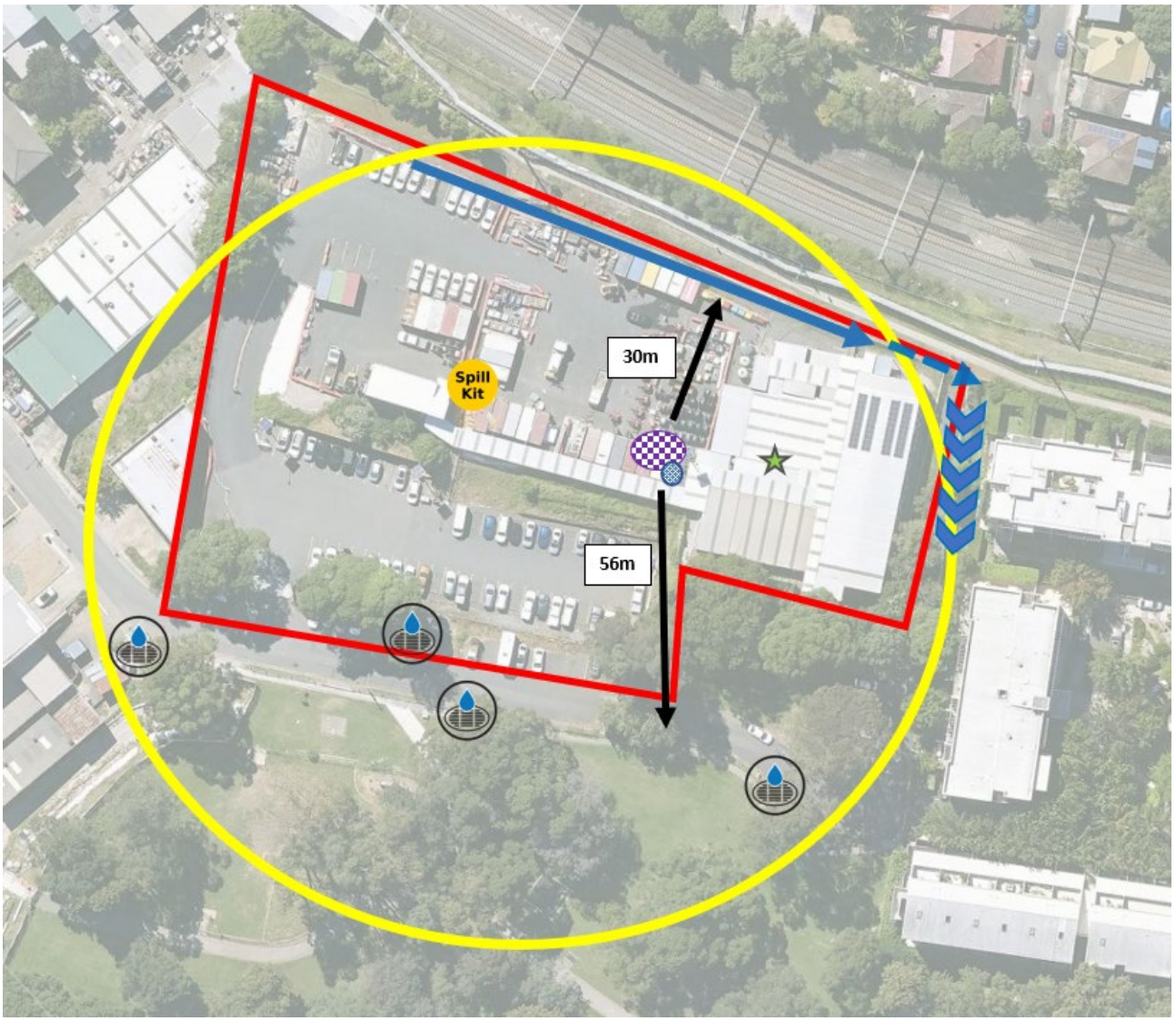
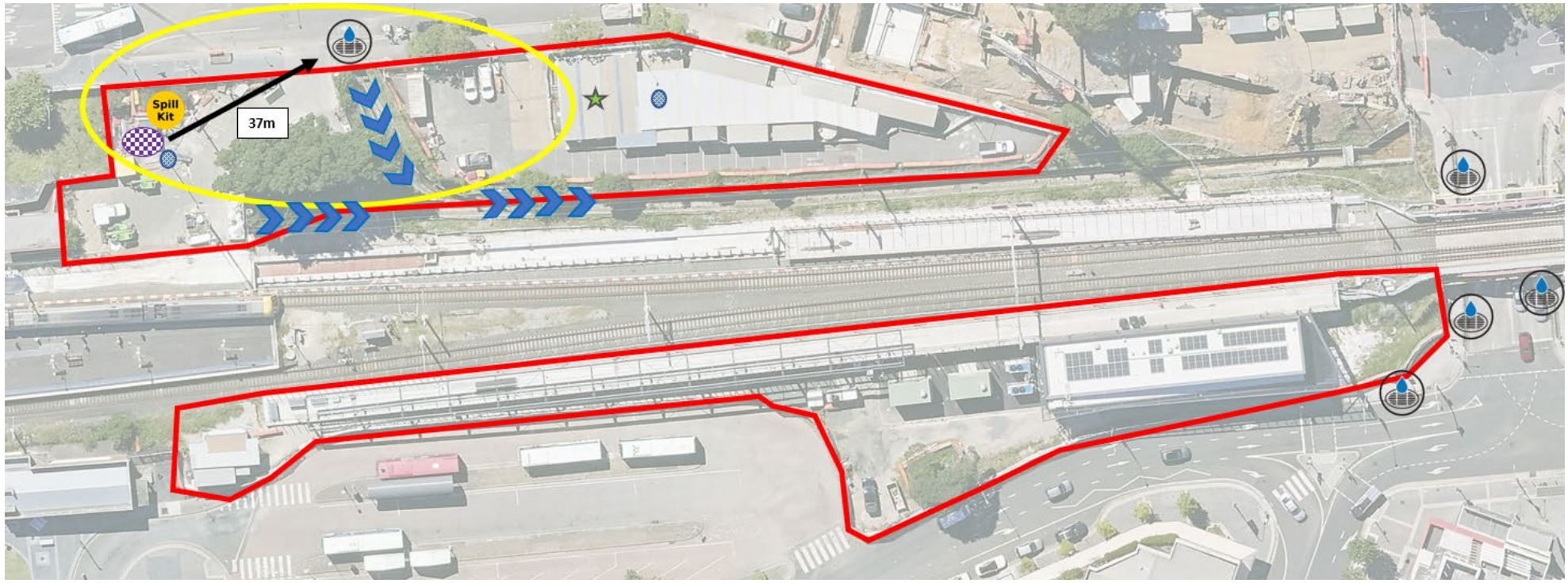

Spill Kit
30m
56m

Figure 2: JHLOR Bankstown Office Compound, 53 North Terrace Bankstown



Appendix 15: Bush Fire and Air Quality Concentration

NSW Government Planning and Environment: Daily Air Quality Data
South: Earlwood
North: Lidcombe
East: Alexandria

https://www.dpie.nsw.gov.au/air-quality/air-quality-concentration-data-updated-hourly/daily-air-quality-data

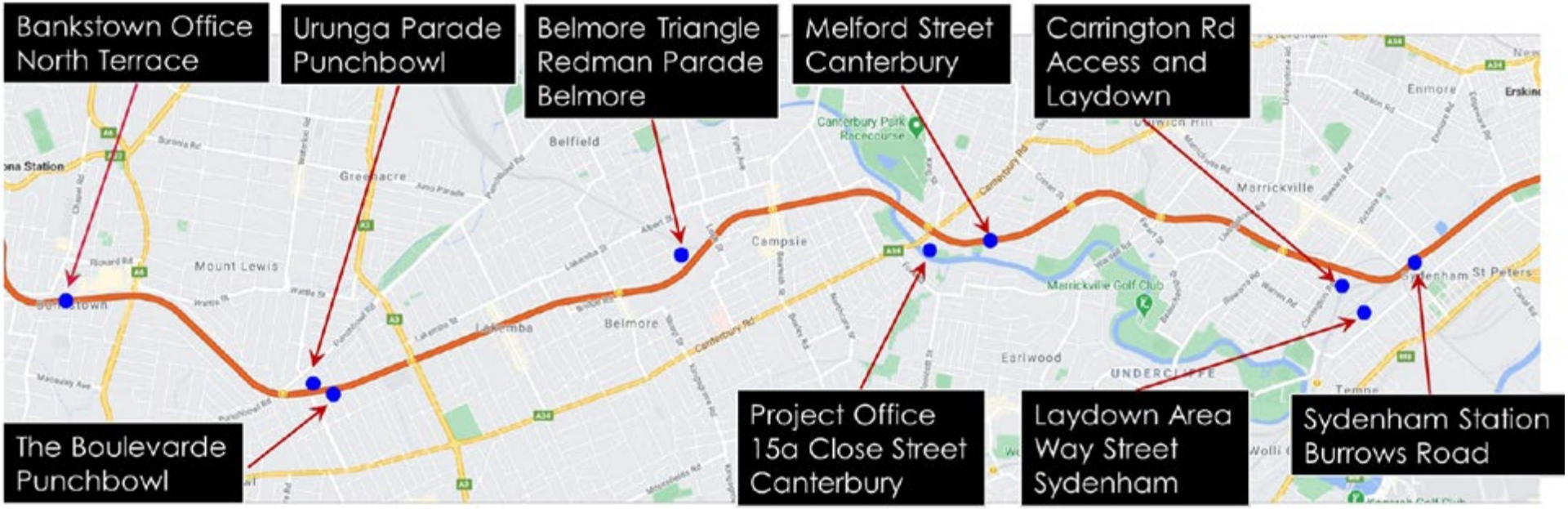
https://www.dpie.nsw.gov.au/air-quality/air-quality-maps/sydney-map

Appendix 16: PIRMP Test Register

Title	Date	Details	Findings	Next Scheduled
Test - excavator working on the drainage at the back of the compound rolled over and caused a diesel/oil spill into the stormwater canal	13/12/2019	Location: Behind Office Compound Event: Oil Spill	Flowcharts in the IECMP need updating Notification protocol needs to include contacts for Canterbury Bankstown Council Contact lists need updating	Before Christmas Shutdown
Test – A large item of plant (Excavator or Piling Rig) rolls over after the operator has a suspected medical incident, causing a major fuel spill into an area close to stormwater drainage channel that leads to the Cooks River	30/10/2020	Location: SWMC Site Event: Medical / Environment emergency	The drill went well with all participants having a good understanding of what was required to manage the scenario posed Increase awareness around Fire and Rescue service capabilities for hazmat control – add to Toolbox Talk	Before 30/10/2020
Test Xmas Shutdown: A fuel tanker has been refuelling a piling rig at Wairoa Street, Canterbury. Contact has been made between an excavator bucket and the fuel tank and approximately 300 litres of fuel has spilt. The street drainage within the vicinity of the incident is quite close to the Cooks River. A plume has been observed within the river and members of the public are crowding around. The event has been deemed a “crisis”.	13/10/2021	Location: Waiora St, Canterbury Event: Drill Fuel spill	Team responded in accordance with plan – appropriate actions undertaken. Identified that Christmas time is usually a period when the usual responders may not be contactable – need for Christmas time planning raised Notifications to Agencies, client Media management. Public management	Before 13/10/2021
Test – Plant leaks oil into surrounding drains, Operator exits a telehandler to shut a gate and the telehandler rolls down an embankment out of control onto the alignment. The telehandler has a Jib attachment and is resting on one of the tracks.	2/03/2022	Location: Office Compound Event: Oil leaks from plant	Team responded in accordance with the plan – all agreed to call PO and Emergency response team 1st. Team developed a detailed flowchart that would have met the IECMP requirements. Increase awareness around oil spill emergency response.	Before 12/12/2023
Test – Vac truck drives tines into diesel fuel pod (approx. 2,000 litres) at 7:55am. Operators jumps off without applying brake and truck moves uncontrolled, drives over operator’s foot, and breaks bones. Diesel leaks onto truck exhaust, starts smouldering, potential fire emergency.	31/10/2023	Location: Close St, Canterbury. Event: Diesel leak and potential fire	Team responded in accordance with the plan – fire suppression measures (truck fire extinguisher), environmental spill kit deployment, vacuum reuck summoning, notification to Fire Brigade (at	Before 12/12/2024

			8:04am – approx. 9 minutes after the event), summoning assistance for medical emergency (first aid), escort at gate and evacuation to First Aid Room. Project lead used fire warden and first aider lists to assist with appointing emergency respondents. Fire evacuation from first alarm, accounting for personnel, notification to Sydney Metro (outside of drill scope), notification to LOR (drill was terminated before it needed to be reported). Notification to EPA – spill was contained within site premises and there was no material harm. No reporting required. Increase awareness around oil spill emergency response.	
Test – Scenario was that the heritage building at Hurlstone Park site had been set alight (arson). Some chemicals (fuel and paint) were temporarily stored in the area. A significant amount of heat and noxious smoke was generated from both chemicals and the timber structure of the building that set on fire. Noxious smoke was generated in particular when the lead paint on exterior of the building started to flack.	21/11/2024	Location: Hurlstone Park Railway Station. Event: Fire on the station heritage building / noxious fume from fires.	Team responded in accordance with the plan – fire suppression measures (fire extinguisher). Workers met at the designated emergency point. Machines were turned off and not idled. Increase awareness around fire response and working / strong chemicals within heritage building.	Before 21/11/2025

Appendix 17: Project Site Map



Appendix 18: Site Incident Management Plan for Sydenham Station

Sydney Trains - SMS-15-TP-4133 Rev 3.2

Available on request – EmergencyPreparedness_SIMP@transport.nsw.gov.au

(Separate document)