

Report



Pollution Incident Response Management Plan

Crookwell Wind Farm.
June, 2023

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Document Control

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1. Introduction.

The purpose of this Pollution Incident Response Management Plan (PIRMP) is to give effect to the requirements of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act).

1.1. Legislative Context.

In 2012 changes to the POELA Act introduced a new requirement under part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare, keep, test and implement a pollution incident response management plan (PIRMP). The requirements for a PIRMP is set out in:

- Part 5.7A of the POEO Act 1997.
- Part 3A of the POEO Regulation 2009.

In accordance with section 98B of the POEO Regulation this PIRMP is presented in written form. To fulfil the requirements of section 98D of the POEO Regulation, an up to date copy of this PIRMP will be made readily available both the project site (Site Office) and publicly on the company's website (<http://www.unionfenosa.com.au/nsw-crookwell-2-project-documents/>).

2. Background.

The Crookwell 3 Wind Farm (C3WF) Project is located in the southern tablelands region of NSW, approximately 14km southeast of Crookwell, (population approx. 2,500) and approximately 30km northwest of Goulburn (population approx. 24,000). The C3WF site covers an area of 1,100 hectares and is within the Upper Lachlan Shire Local Government Area, and is surrounded by predominantly grazing properties and timber plantation.

The project is considered the 2nd stage of the Crookwell 2 wind farm, also owned and operated by GPG Australia.

The project was approved 14 October 2020 for 16 wind turbines with a maximum blade tip height of up to 157 metres, and a total project capacity of approximately 50MW. Energy produced will connect to the grid via the Crookwell 2 wind farm terminal station which in turn connects through a 330kV Transmission Line system. Construction of Crookwell 3 Windfarm commenced in November 2022. The project consists of;

- A network of site tracks to provide access to each turbine on the site and to the substation and a network of underground electrical and communications cables. The electrical substation and switchyard, connecting C3WF to TransGrid's electrical transmission system; and a site control room / facility building.

An Environmental Protection License (EPL) is required for the operation of wind farms in NSW under Protection of the Environment Operations Amendment (Scheduled Activities) Regulation 2013 which commenced on 10 April 2017. A license has been obtained by the Proponent (21601) and it will be maintained by the Owners Representative throughout the life of the project. Monitoring/compliance actions will be undertaken in accordance with the conditions of the EPL. This plan relates to construction activities for the windfarm, and will be updated for the operation phase prior to commissioning.

Crookwell 3 Development Pty Ltd. Is the company that holds the rights for the 50 MW Crookwell 3 Wind Farm. GPG Australia Pty Ltd (GPG Australia) it's the Australian subsidiary of Global Power Generation (GPG), GPG Australia is the 100% owner of Crookwell 3 Development Pty Ltd (C3DPL).

Vestas – Australian Wind Technology Pty Ltd is contracted for the supply and installation of the turbines and associated control infrastructure. TransGrid own and operate the substation shared between Crookwell 2 and Crookwell 3 windfarms. The Principal Contractor for the civil earthworks stage of construction is Denrith Pty Ltd (trading as Divall's Bulk Haulage and Earthmoving).

2.1. Onsite Infrastructure



The access to the Crookwell 3 Wind Farm is via Graywood Siding Road, Woodhouselee, NSW. The site is located on a system of undulating hills and valleys bounded by Woodhouselee Rd to the west, and Graywood Siding Road to the south and east.

The wind farm consists of;

- 16 x Vestas V126 Wind Turbines,
- 33kV underground cable network
- Road and drainage network
- Landscaping and fencing
- 330kV Substation and Switch-yard (owned and operated by TransGrid)
- 33kV Switch-room inclusive of communications and control equipment

Hazardous Substance Storage Containers, and waste storage areas are located at the storage area next to the main site compound and consist of the follow items;

- 1000L self-bunded diesel storage trailer
- 200L oil and lubricants in Hazchem container
- 2 x Timber, 1 x Steel Recycling skip bins
- 2 x General Waste skip bin

A concrete batching plant will be on site for approximately the first 6 months of construction.

There are no workshop facilities on site.

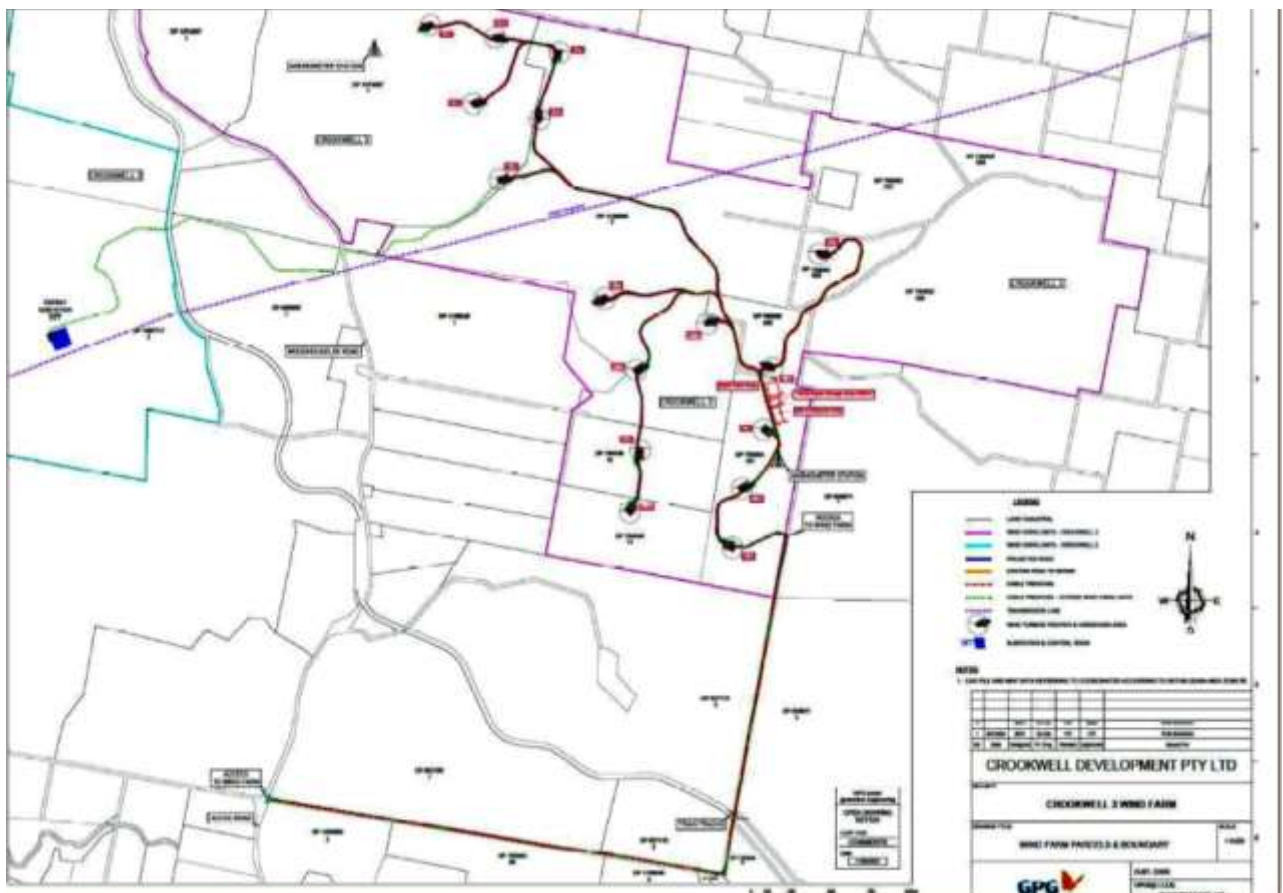


Image 1: Site Location

3. Requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation).

3.1. Relationship with other emergency plan



Divall's Bulk Haulage and Earthmoving (as Principal Contractor) has developed an *Emergency Response Plan* (last version: 11 January 2023). That Plan is prepared to describe the procedures that have been implemented to allow personnel to plan for and to respond to emergency situations at the C3WF construction site. It applies to all site level emergencies and to all personnel onsite including Employees, Subcontractors and Visitors.

The Project Manager shall review the plan at twelve (12) month intervals, when significant changes occur (i.e. access and egress changes) and after major emergencies, to evaluate its effectiveness. Principal Contractor status will be handed over to Vestas for the installation phase of the windfarm, and they will provide

TransGrid, as the owner and operator of the substation, has also developed its own *Emergency Response Manual* (MNA-SUB-ERM-270). Transgrid's substation is wholly contained within the envelope of the Crookwell 2 Windfarm, and falls under the Crookwell 2 PIRMP.

The information contained in the *Emergency Response Plan* of Divall's has been taken into account for the preparation of this Pollution Incident Response Management Plan (PIRMP)

3.2. Description and likelihood of hazards

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 any noise

A pollution incident is required to be notified if there is a risk of '*material harm to the environment*', which is defined in section 147 of the Protection of the Environment Operations Act 1997 (POEO Act):

- a) 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**
 - ii It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000AUD (or such other amount as is prescribed by the regulations), and
- b) 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."

All personnel (employer, occupier or other person carrying on the activity) shall report all actual environmental incidents immediately to the WHSE supervisor and/or C3WF Site Manager (GPG) or Engineering Manager (Divall's). It is the responsibility of the WHSE supervisor or nominated person(s) to fully investigate the occurrence with personnel involved in accordance with the 'Accident Investigation and Reporting' in PROSAFETY (corporate tool).

In the event of an environmental incident on site, the C3WF Engineering Manager shall complete within 24 hours:

- Accident/Incident Report
- Accident Statement Report

For incidents where there is not material harm to the environment, notification to the relevant authorities is not required, as defined in section 147 of the Protection of the Environment Operations Act 1997, however application of internal document **NT.00035.GN** *Accident and incident communication*, investigation and follow-up process is required.

3.2.1. Type of hazards

Hazards may be associated with impacts to air, land, heritage, water quality, ecosystems or sensitive receptors (including neighbouring landholders). The environmental aspects of being affected and the main associated hazards are identified below:



Description of Hazard/Aspect	Risks/Opportunities/Impacts
Spillage or leakage of Hazardous Substances	Contamination of ground/ potential runoff to ground and waterways
Waste Generation and Disposal	Contamination of site environments. Affected livestock from waste digestion. Impacts to human health during handling or clean-up activities
Noise/Vibration in Excess of Legislative Requirements	Non-compliance with legal requirements and disturbance of neighbours and wildlife.
Fire	Fire damage to plant, persons, property, farmland and vegetation
Unauthorised Disturbance to Flora and Fauna	Non-compliance with legal requirements and harm to flora and fauna
Erosion and Sediment Discharges	Damage to heritage, sediment and erosion run off.
Introduction of Noxious Weeds	Biosecurity risks

Table 1. Summary of environmental hazard

From the identification of hazards generated through work activities on site, Divall's/CD3PL have developed Process Procedures to manage the hazards associated with those activities.

3.2.2. Location of Potential hazards

Location	Description	Potential hazards
Wind turbines	<ul style="list-style-type: none"> To be updated prior to Vestas mobilisation on site 	<ul style="list-style-type: none"> Contamination of site environments. Affected livestock from waste digestion. Impacts to human health during handling or clean-up activities Contamination of ground/ potential runoff to ground and waterways
Substation	<ul style="list-style-type: none"> Managed under Crookwell 2 PIRMP 	<ul style="list-style-type: none"> Contamination of site environments. Affected livestock from waste digestion. Impacts to human health during handling or clean-up activities Contamination of ground/ potential runoff to ground and waterways Potential to intermittently generate both noise and light pollution
Site Operations (including waste management area)	<ul style="list-style-type: none"> Earthmoving and rock crushing Management of site generated waste Concrete batching and materials storage 	<ul style="list-style-type: none"> Damage to heritage, sediment and erosion run off. Contamination of site environments. Air Pollution (from dust generation)
Hazardous Substance Storage Areas	<ul style="list-style-type: none"> 200L cumulative of fuels, oils, solvents and lubricants in Hazchem container – products and volumes to be updated upon Vestas mobilisation to site 	<ul style="list-style-type: none"> Damage to heritage, sediment and erosion run off. Contamination of site environments. Contamination of site environments.



Sewage	<ul style="list-style-type: none">• Site compound includes temporary sanitation facilities. Regular pump-out contract in place, and alarm fitted for full condition.	<ul style="list-style-type: none">• Contamination of site environments. Impacts to human health during handling or clean-up activities.• Contamination of ground/ potential runoff to ground and waterway.• Impacts to flora and fauna
Access	<ul style="list-style-type: none">• There is approximately 12km of access tracks within the wind farm footprint.• There are 28 individual hardstand areas located adjacent to each of the onsite wind turbines.	<ul style="list-style-type: none">• Dust emissions and sediment release associated with the erosion of running tracks and batter slopes
Weed infested areas	The wind farm is located within actively utilized farming properties.	<ul style="list-style-type: none">• Introduction of Noxious Weeds: biosecurity risks

Table 2. Location of environmental hazard

3.2.3. EHS RISK ASSESSMENT

Divall's is contracted for the civil construction. The following is a summary of the environmental risks evaluated by Divall's and GPG for civil construction

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
41	Environmental	Applicable														
42	Acid sulphate soils															
43	Air quality - dust	Applicable														
44	Asbestos															
45	Bushfire controls	Applicable														
46	Contaminated land															
47	Cultural heritage - Indigenous	Applicable														
48	Cultural heritage - Non-indigenous															
49	Excavation de-watering	Applicable														
50	Erosion and sediment control	Applicable														
51	Fauna and flora	Applicable														
52	Ground water quality															
53	Hazardous substances and dangerous goods	Applicable														
54	Noise / Vibration	Applicable														
55	Waste management	Applicable														
56	Waste management - Regulated															
57	Weed / biological management	Applicable														
58	Other															

Risk Register Environment

Environmental, Sustainability and Heritage											
Work Description:	Environmental, Sustainability and Heritage										
Hazard / Aspect (Pathway to Harm)	Initial Rating Risk rating prior to controls in place			Controls required to eliminate or minimise the potential for injury or harm based upon the hierarchy of control	Control Hierarchy	Reference Documents	Residual Rating			Monitoring Requirements (Monitoring Plan)	Progress Notes
Aspects and Impacts	Consequence	Likelihood	Risk				Consequence	Likelihood	Risk		
Cultural heritage - Indigenous					Ensure client has provided details & requirements of any heritage significance prior to commencement						Induction
Disturbance/destruction of cultural artefacts					If required ensure a management plan is developed						Inspection
Disturbance/destruction areas of significance	2 Substantial	2 Remotely Possible	2M		Ensure the project delivery and workers/Sub-contractors have been inducted onto the requirements	EMP V4.2.docx	1 Minor	2 Remotely Possible	3L		
					Identify and communicate any specific hold points, prior to proceeding with works						
					Identify, locate, delimitate items of heritage significance prior to commencement of works at site						
					Notify Project Manager if any items or relics are discovered						
Air Quality Dust Control					Monitor all material stockpiles and disturbed areas that could cause airborne debris						Induction
Air quality impacted by dust					Spread water to suppress dust in dry/windy conditions						Inspection
					Minimise stockpiling and move spoil to a centralised stockpile						
					Provide covers such as a tarp for stockpiles						
	1 Minor	2 Remotely Possible	3L		Minimise the period of time between excavation and backfilling	OPC EP-4.4 Air Quality.docx	1 Minor	1 Practically Impossible	3L		
					Clean soils and debris from road surfaces at completion of each day's activities						
					Stage vegetation clearing to minimise the exposure						
					Avoid disturbing natural ground cover on access tracks and surrounding areas						

Erosion, Water, Sediment Movement										Induction	
Sediment movement, pollution, erosion										Inspection	
	2 Substantial	2 Remotely Possible	3M	Install sediment controls to prevent sediment entering stormwater drains, gutters and waterways on site							
				Record the locations of sediment control devices							
				Regularly check sediment controls to ensure they are functioning, and remove excess sediment, extra inspection/maintenance to be conducted after rain events							
				Divert surface water from the site if practicable, in areas where the ground has been disturbed or excavated	OPC EP-4-13 Stopping Sedimentation.docx	1 Minor		1 Practically Impossible	3L		
				Stockpile topsoil and spoil separately to assist rehabilitation							
				Remove any loose soil or sediment from surface							
				Stockpile should be lightly scarified on the contour to encourage rainfall infiltration							
				Chemicals, fuels, and waste, not be stored near drains, watercourses and unsealed surfaces							
Flora & Fauna				Ensure client has provided details & requirements of any significant Flora or Fauna						Induction	
Flora & Fauna damage				If required ensure a management plan is developed and implemented						Inspection	
				Ensure the project delivery and workers/Sub-contractors have been inducted onto the requirements							
				Obtain authorisation from Project Manager and/or client prior clearing vegetation	OPC EP-4-11 Flora and Fauna Inspection and Protection.docx	1 Minor		2 Remotely Possible	3L		
	2 Substantial	3 Possible	3M	Identify and protect significant flora or fauna, and erect fencing and install signage							
				Identify and communicate any specific hold points, prior to proceeding with works							
				Excavations should be conducted within a trees drip line (Tree Protection Zone), & suitable fencing installed							
				Lay-down areas should be established to minimise impact on surrounding Flora, Fauna, Tree Protection Zone							
				Native animals are not to be handled unless it is an emergency situation (i.e. injured animal), animals identified in work area to be notified to site supervisor to organise removal for appropriate site placement							
Waste Management				All prescribed waste will be transported and disposed of at licensed EPA facilities and licensed transporters						Induction	
General and Regulated				All prescribed waste transport and disposal documentation must be retained, and client provided a copy						Inspection	
Excessive waste and incorrect disposal				Excess vegetative material is to be reused or spread where appropriate or in consultation with landowners							
	1 Minor	2 Remotely Possible	3L	Avoid waste generation where applicable	OPC EP-5-6 Waste Minimisation.docx	1 Minor		1 Practically Impossible	3L		
				Reduce waste and to keep waste to a minimum							
				Recover, re-use and recycle waste where applicable							
				Use recycled products where appropriate and where conforming to the technical – specifications							
				Dispose of waste that cannot be reduced, re-used or recycled, to an appropriately designed & licensed waste facility							
				Recovered materials to be segregated and placed in the relevant bins at the site/depot for re-use or recycling							
Noise and Vibration				Construction hours (7:00 – 18:00 Monday to Friday, Saturday 8:00 – 13:00)						Induction	
Negative impact on the vicinity				No sundays or Public Holidays. Exemptions may be granted by the client						Inspection	
				Construction hours to be communicated within the project induction							
	1 Minor	2 Remotely Possible	3L	All equipment shall be appropriately silenced and maintained in accordance with manufacturer's requirements		1 Minor		1 Practically Impossible	3L		
				Noisy machinery and equipment shall be switched off when not in use							
				Community consultation and notification shall be undertaken if activities may disturb residence							
				Complaints relating to noise or vibration must be directed to the Project Manager, and resolved promptly							

Risk Matrix:

Risk Score Calculator	Consequences					
	Disaster	Very Serious	Major	Substantial	Minor	
Likelihood	Almost Certain	3H	3H	3H	2M	2M
	Likely	3H	3H	2M	2M	2M
	Possible	3H	2M	2M	2M	3L
	Remotely Possible	2M	2M	2M	3L	3L
	Practically Impossible	2M	3L	3L	3L	3L

Likelihood/Consequence	Risk Class
The hazard has the potential to: <ul style="list-style-type: none"> Permanently disable or kill Cause major damage to the structure Have significant impact on the surrounding population and environment 	3H
The hazard has the potential to: <ul style="list-style-type: none"> Temporarily disable or seriously injure Cause minor damage to the structure Breach the site boundaries and pollute local environment 	2M
The hazard has the potential to: <ul style="list-style-type: none"> Cause minor injury Be contained within the site boundary 	3L

- 1 **Eliminate the hazard** altogether, e.g. get rid of the dangerous machine.
- 2 **Substitute the hazard** with a safer alternative, e.g. replace the machine with a safer version.
- 3 **Isolate the hazard** from anyone who could be harmed, e.g. keep the machine in a closed room and operate it remotely.
- 4 **Use engineering controls** to reduce the risk, e.g. attach guards to the machine to protect users.
- 5 **Use administrative controls** to reduce the risk, e.g. train workers how to use the machine safely.
- 6 **Use PPE**, e.g. wear gloves and goggles when using the machine.

More Effective

Less Effective

Risk Escalation	
Residual Risk	Actions Required
Extreme	<p>Task cannot commence until the risk / hazard is eliminated or reduced.</p> <p>This means a reassessment of the risk / hazard needs to be undertaken. Where the reassessment does not achieve the desired result then:</p> <p>a) Inform the President and relevant Operations Manager by email including possible alternative risk / hazard control solutions.</p> <p>b) Arrange for a risk review involving the Project Manager and HSEQ Manager</p> <p>c) Seek written approval from the Operations Manager for the risk / hazard controls solutions as agreed and prior to the commencement of works.</p> <p>d) Document new / additional risk control solutions in the HSE Risk Register.</p> <p>e) Monitor and review effectiveness of risk control solutions as scheduled.</p>
High	<p>Task can commence with a combination of Control Levels 1-3.</p> <p>This means a reassessment of the risk / hazard needs to be undertaken. Where the reassessment does not achieve the desired result then:</p> <p>a) Arrange for a risk review involving the Project Manager and HSEQ Manager.</p> <p>b) Seek written approval from the Project Manager for the risk / hazard controls solutions as agreed and prior to the commencement of works.</p> <p>c) Document new / additional risk control solutions in the HSE Risk Register.</p> <p>d) Monitor and review effectiveness of risk control solutions as scheduled.</p>
Significant	<p>Task can commence with a combination of Risk Control Levels 1-3.</p> <p>This means a reassessment of the risk / hazard needs to be undertaken. Where the reassessment does not achieve the desired result then:</p> <p>a) Arrange for a risk review involving the Project Manager and Project HSEQ Safety Manager.</p> <p>b) Document new / additional risk control solutions in the HSE Risk Register.</p> <p>c) Monitor and review effectiveness of risk control solutions as scheduled.</p>
Modarale	<p>Task can commence under the following actions:</p> <p>a) Implement the risk control solutions as documented.</p> <p>b) Monitor and review effectiveness of risk control solutions as scheduled.</p>
Low	<p>Task can commence under the following actions:</p> <p>a) Implement the risk control solutions as documented.</p> <p>b) Monitor and review effectiveness of risk control solutions as scheduled.</p>



3.3. Inventory of Hazardous Substances (Pollutants)

Potential pollutants that may be present on the construction site are listed Table 3 together with the storage locations and the quantity of the pollutant. More details on these pollutants are included in the site Safety data Sheets register available in the CR2WF Site Office.

Pollutant	Location	Use	Volume stored
4-stroke SAE30 oil	Hazchem container	Fuel Additive	4L
Acetone	Hazchem container	Solvent	1L
Diesel	Hazchem container	Fuel	300L stored in Hazchem container. Approx 1000L stored on a fuel container mounted on a portable trailer
5.56 Aerosol	Hazchem container	Lubricant	1 can (175mL)
White lithium grease aerosol	Hazchem container	Lubricant	1 can (300mL)
CO Contact cleaner	Hazchem container	Electronics cleaner	2 cans (300mL)
Regular unleaded petrol	Hazchem container	Fuel	500L
Brake cleaner	Hazchem container	Solvent	1 can (840mL)
Marker paints	Hazchem container	Paint	Approx. 15 cans (350g each)
Butane Gas	Hazchem container	Fuel	1 can (300mL)
Oil blend dispensed as aerosol	Hazchem container	Protectant	1 can (300mL)
Hydraulic oil	Hazchem container	Non-compressible fluid	300L
Grease	Hazchem container	Lubricant	50L
Engine coolant	Hazchem container	Coolant	50L
PVC priming fluid	Hazchem container	Solvent	2L
PVC glue	Hazchem container	Solvent	2L

Table 3. Inventory of pollutants

3.4. Safety equipment and preparedness

Personnel are advised of this plan at the site induction, with periodic reminders at toolbox meetings, briefings on the plan and responsibilities or by the conduct of table-top scenarios. Emergency drills shall be performed every 6 months. The following shall be in place:

- First Aid Risk Assessment has been completed and implemented;
- First Aider Poster displayed in key locations onsite;
- Fire Risk Assessment has been completed and implemented;
- Personnel declare medical conditions at the time of their inductions;



- Emergency processes communicated at the inductions;
- Sufficient number of trained first aid personnel on site
- Resources necessary to respond to emergencies are available and accessible, for example:
 - A chemical response kit is available; and
 - Fire-fighting equipment is available;
- The Site Hazardous Substance Register is up to date;
- Material Safety Data Sheets (SDS) are available for the chemicals that are in use on the site;
- Emergency Posters and site contact details are displayed, with current information;
- Responses to major plant /crane incidents (i.e. rollover, etc.) and collapse of ground incidents have been considered in the risk assessments (i.e. SWMS) for such tasks;
- An emergency assembly point is signposted; and
- Availability of emergency services and response times to different parts of the project.

3.5. Contact details

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 on the activity
- an employee or agent carrying on the activity
- an employer carrying on the activity
- the occupier of the premises where the incident occurs

Notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

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

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

Service	Location	Contact	Distance to Site	Approximate Travel Time
Goulburn Base Hospital	130 Gold Smith Ave Goulburn NSW	(02) 4827 3111	28 km	20 min
Crookwell District Hospital	19 Kialla Rd, Crookwell NSW 2583	(02) 4837 5000	16km	12 min
Fire and Rescue NSW	161 / 157 Bourke St, Goulburn	(02) 4822 1608	29 km	21 min
Goulburn Police Open 24 hrs	274 Sloan St, Goulburn	(02) 4824 0799	30 km	23 min
Ambulance Station	18 Clifford St, Goulburn	(02) 4827 0400	29 km	23 min
SES Goulburn	Lanigans Lane 2580 Goulburn, New South Wales	13 25 00	31 km	24min
Transgrid	N/A	1800 027 253	N/A	N/A
SafeWork NSW	Lower Ground Floor 159 Auburn Street, Goulburn, NSW 2580	13 10 50	30 km	23 min
Environment Protection Authority	11 Farrer Place, Queanbeyan NSW 2620	131 555	123 km	1hr 23min
APA Gas Utility Provider	N/A	1800 676 300	N/A	N/A



Goulburn Murray Water	N/A	1800 064 184	N/A	N/A
CASA	16 Furzer Street Phillip ACT 2606	131 757	N/A	N/A
Upper Lachlan Shire Council	44 Spring Street, Crookwell NSW 2583	Office Hrs: (02)4830 1000 Out of hours: 0429 786 659	15 km	11 min
Telstra	2/217 Auburn St, Goulburn NSW 2580, Australia	13 22 03	N/A	N/A
Host Landowners		Private (GPG has these contacts)	0km	0km

Table 4. Emergency contacts

Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.

All personnel shall report all actual environmental incidents immediately to the WHSE Supervisor and/or C3WF Site Manager (GPG) or Principal Contractor (Divall's). It is the responsibility of the WHSE supervisor or nominated person(s) to fully investigate the occurrence with personnel involved in accordance with the 'Accident Investigation and Reporting' in PROSAFETY.

Person	Position	Phone
David Santo Tomas	C3WF Project Manager	+61 400 403 271
James Brighton	C3WF WHSE Site Supervisor	+61 466 602 080
Daniel Cullen	C3WF WHSE Manager	+61 466 548 257

Table 5. Personal phone

In the event of an emergency, site communications are at least one of the following means:

1. Mobile phone
2. Two Way radios located in machines or hand held

Project Admin and Emergency 2-Way Radio Channel is: 13

During an emergency, personnel are alerted by the call "EMERGENCY, EMERGENCY, EMERGENCY". The Site Supervisor/s (and/or Manager/s) responds.

Other personnel maintain radio silence, unless they are invited to join the discussion on the radio and all machinery and vehicles must park up safe to do so until the all-clear is given.

In any event, the Emergency Plan will include action guidelines in the event of accidents with an environmental impact. All incidents, accidents and non-conformities are undesirable events that are proof of non-compliance with the Integrated Management System, wherefore actions must be taken in order to restore compliance as soon as possible so that any consequences are minimized and so that the causes can be analysed to prevent their repetition.

The basic action criteria for identifying, processing and investigating the causes of accidents, incidents and non-compliant products and/or services are defined in NT.00035.GN *Process of communication, investigation and follow-up on accidents and incidents*, in NT.00036.GN *Classification of incidents*, in PE.00010.GN-GA *Environmental Accidents and Incidents* and in PG.00007.GN *Management of findings of the Integrated Quality, Environment, Health and Safety Management System*

3.6. Communicating with neighbours and the local community

The external communications strategy for the C3WF is built around the following fundamental principles:



Provision of relevant information to specific stakeholder groups during operation (website, newsletters, local media, letter drops):

- Provision of a 24-hour complaints line during operation.
- Operation of a Community Consultative Committee (CCC) in accordance with Schedule 4, 3 and 4 of Conditions of Consent
- Quarterly meetings with host landowners

To this extent, local residents would have targeted access to information about the Wind Farm, including formal and informal opportunities to find out about operations, and to provide feedback to the Wind Farm operators.

Relationships with local residents have been established throughout the planning and development phases of the project. The relationships and communication methods used in the past would be continued throughout operation as appropriate and as needed.

The broader community will be kept informed of the project through general media, including newspaper advertisements and press releases, and through the local Council. The website will also be used to post information.

3.6.1. Community Complaints Protocol

C3DPL is committed to minimising the impact of the operations on the local community. To ensure that the community have the opportunity to provide feedback on any issues they may be experiencing, C3DPL have developed a Complaints Management Procedure.

The procedure aims to:

- Provide a variety of communication channels to enable members of the community to comment and lodge complaints regarding operational impacts at all times during the construction period.
- Ensure timely response to complaints and implementation of any appropriate corrective/preventative actions.

The management plan will be revised following the completion of construction to ensure the system's ongoing suitability for operational purposes

Method	Details
Telephone ¹	1800 457 181 (Free Call) or +61 02 6274 3200
Postal	Suite 4, Level 3, 24 Marcus Clarke Street, Canberra ACT 2601
Email	info@unionfenosa.com.au

Note 1: This number may be directed to a message bank system if the WHSE supervisor is not able to take the call (including out of hours). All messages left will be responded to within 24 hours.

These contact details may change through the life of the project, in which case the C3DPL will ensure that the community are advised of the new contact details.

Complaints Register

All complaints received will be recorded on Community Complaints Form and also summarised in the Complaints Register. This Community Complaints Form is the input form for the complaints register which is an Excel Database.

The records of the complaint will be maintained for at least four years following the date of the complaint.

Procedure

All environmental complaints will initially be referred to the WHSE supervisor. On receipt of a complaint the WHSE supervisor will:



- Contact the complainant (ie if a message/email etc has been left).
- Complete a Community Complaints form to record:
 - the date and time, where relevant, of the complaint.
 - the means by which the complaint was made (telephone, mail or email).
 - any personal details of the complainant that were provided, or if no details were provided, note to that effect.
 - the nature of the complaint.
- Co-ordinate with the Site Manager/relevant contractors to determine and implement appropriate corrective actions if possible.
- Advise the complainant of the corrective actions and record these on the Community Complaints Form.
- Complete the Community Complaints Register.

If corrective actions cannot be implemented immediately, an incident report will be raised to manage the process. If appropriate, follow up with complainant to review outcome of implemented corrective actions.

Responsibilities

The Community Engagement Officer will be responsible for the management of all complaints received.

This includes:

- Responding to the calls of the 1800 phone number and following up any messages left with community members.
- Responding to any email complaints received.
- Responding to any postal complaints received.
- Co-ordination of appropriate corrective actions in response to the complaint.
- Completion of the Community Complaints Form and updating of the Complaints Register.

The Project Manager has overall responsibility to ensure corrective actions are implemented for issues raised and all Community Complaints are closed out.

3.7. Minimising Harm to Human Health

Harm to human health will be reduced utilising methods including:

- Provision of training in accordance with this PIRMP and the ERP for the project.
- Provision of hazard identification and risk control support during the operation of the windfarm, including the provision of equipment and materials necessary to reduce the identified risk.
- Provision of safety management training in accordance with the company specific safety management systems and in accordance with the Construction Environmental Management Plan (CEMP) for the project.
- Ensuring that project personnel are aware of their duties under the Work Health and Safety Act 2011 with respect to their own safety and the safety of other project personnel.
- Ensure appropriately trained people are used where chemical handling is required, e.g. the use of herbicides for weed control on the project.
- Provision of Personal Protective Equipment (PPE) suited to the individual worker and the role they undertake on the project site.
- Provision of designated muster points.
- Provision of defined procedures, e.g. the provision of Safe Work Method Statements (SWMS) or Environmental Work Method Statements (EWMS), where a risk to human health is present.
- Creating a safe environment for the clean-up of the release of a pollutant to avoid the occurrence of a secondary incident during the rectification of the initial incident.

3.8. Incident Response

In the event of an emergency, the initial response is critical to ensure that the necessary assistance is provided in a timely manner to safeguard life. The initial response process comprises the following critical steps:

- Notification of an emergency and recording of facts;
- Organizing emergency assistance to the incident scene; and
- Maintaining contact with scene and seeking external response if appropriate.

It is important to note that any site personnel may be called upon to assist with the internal emergency response and assume a role for which they hold the relevant skills/competencies/experience. For example, qualified first aid personnel may be required to render first aid, competent operators to assist with vehicle recovery, etc. The main objective of the site emergency response will be to:



- Stabilise the situation to the extent of resource capability
- Take steps to prevent escalation in severity until external emergency services arrive

No person is to provide assistance, if doing so places that person or others at risk. Wait for external assistance to arrive where required.

3.8.1. Spill

When a spill occurs involving possible contamination of the soil or contamination of watercourses or the generation of hazardous waste, personnel will proceed as follows:

During the emergency

- Take suitable personal protection measures for working in the spillage zone.
- To the extent that this is possible, immediately cut off and isolate the spillage source.
- Cordon off the zone and isolate it as much as possible
-
- If the spillage flows **into a watercourse**:
 - and the containment and absorption barriers are not in place, they shall be positioned immediately downstream from the spillage point.
 - If containment and absorption barriers are already in place, the need for further barriers shall be assessed and their state shall be examined in case it is necessary to strengthen them.
 - The Authority shall be informed immediately.
- If the spillage has flowed **onto the ground**: apply the products available (emulsifiers, degreasers or blanket) to confine and reduce the spillage. The cleaning method will be:
 - *Used oils and liquid fuels*: recover them by physical-mechanical means. Clean with an absorbent, inert material. Sawdust is not recommended because it is easily combustible.
 - *Chemical products*: isolate the spilt product and establish its nature and amount in order to determine the degree of mobility, persistence and toxicological properties. If the product is a liquid, clean with an absorbent, inert material.
 - *Paint*: confine and clear up the spillage with absorbent and non-combustible materials, and put the paint in a container that is suitable for subsequent disposal in compliance with local by-laws. Clean preferably with detergent, rather than solvent
- Deposit the products collected in airtight and isolated places/containers
- Store the materials used for cleaning the spillage as hazardous waste, in compliance with the legislation in force.

Measures to be taken after the emergency If the spillage has flowed **onto the ground**:

- The absorbent materials shall be removed together with the amount of contaminated soil necessary to prevent the contamination from spreading.
- These shall be treated as hazardous waste and the materials shall be properly managed by an authorised waste management company and authorised transporter.
- The depth and extension of the extracted zone shall be assessed.
- The excavated zone shall be filled in with materials similar to those extracted from the layers of soil removed.
- In natural ground that is not going to be taken up by permanent facilities, the upper organic layer shall be decompacted and prepared in order to improve the conditions that will enable the new species to take root.

If the spillage has **flowed into a watercourse**:

- The containment barriers shall be removed when it is clear that all the spillage has been removed; these barriers shall be managed as hazardous waste.
- If it was an accident, the water quality in the course affected shall be monitored.

- If necessary, clean the banks with suitable resources (for example, skimmers or pumps that enable the spillage to be collected and transferred from the surface to a storage tank; manual collection with rakes or shovels; applying a substratum that absorbs the excess fluid, etc.)
- If the contingency has affected wildlife, the species affected or that might have been affected in the area shall be rescued immediately and temporarily settled somewhere else that is free from pollution, until the species concerned can be returned to their place of origin.



3.8.2. Major contamination of waterways or storm water or fire in chemical storage

In this case, personnel should:

1. Notify GPG Site Supervisor who will assume responsibility of the response;
2. DO NOT ENDANGER YOURSELF OR OTHERS;
3. Assess the area and make it safe (pedestrians, traffic, collapsing ground, gas leaks, electricity, no sparks or flames);
4. Help any injured person; and
5. Stabilise the situation, if possible (divert water to a suitable site, stop any leaks, build a bund around a spill).

GPG Head Office notifies regulatory authority, if necessary (do not restore the site until regulatory authorities have inspected the site).

3.8.3. Dangerous goods

A dangerous goods event would involve a spill or leakage, or coming into contact with or swallowing, of a hazardous substance during transport, handling or storage.

SDS for chemicals used on site are available at the site office. A register of chemicals held on site is available at the site office. As a minimum, a 170L Spill Response Kit will be maintained permanently on site.

Emergency call on the site radio Notify others in the immediate area Notify Project Manager or Supervisor.

Determine the danger posed by the substance (refer SDS), is it:

- Toxic?
- Flammable?
- Explosive?

Use the Spill Response Kit to contain and absorb spills. Notification of the EPA where appropriate shall be performed by the customer or GE Renewables ANZ EHS Leader.

All contaminated waste shall be disposed of by an approved waste vendor at an appropriately licensed site.

3.9. Evacuation

In rare circumstances, it might be necessary to evacuate the whole site. The decision to evacuate will be made by the senior person on the site in consultation with the person who is at the site of the event.

The order to evacuate will be given to all personnel on site by word of mouth, two-way radio on Channel 80 or by mobile phone. When the instruction to evacuate is received, personnel move to the designated Muster points.

During the evacuation, personnel will check that all personnel in the vicinity are joining the evacuation, including GPG/Divall's employees, Contractors, Visitors, Client's personnel. At the assembly point, a head count will be taken to verify that all personnel are accounted for.



Personnel do not leave the assembly point unless they have been instructed to do so by a Supervisor. The senior person on the site will declare when the site is clear for a return to work.

3.10. Maps

Detailed maps of the layout of the wind farm are included in Appendix 1. The location of potential pollutants is as identified and described within Section 3.3 *Inventory of pollutants* of this PIRMP.

3.11. Staff training

Training on the C3WF project site relevant to this PIRMP includes:

- Site induction training.
- Emergency response training (provided in accordance with the site ERP).
- Spill response training.

Site inductions are valid for a period of up to two years. Inductions are provided by way of a refresher delivered every two years or where changes are made to the induction. Records of all site inductions are retained.

Site inductions have been developed to include information from this PIRMP, including:

- Details of hazards and controls.
- Incident response information.
- Duty to report environmental harm.

The objectives of training provided on this PIRMP are the:

- Provision of information to prevent the occurrence of a pollution event causing material harm.
- Provision of guidance on how to respond to a pollution event, including notification requirements.
- Provision of post-incident responsibilities.

Emergency Drill: 6 monthly

During the drill, the Site Manager and HSE Advisor should observe the conduct of personnel and on completion, conduct a debriefing with all participants as a group. Any deficiencies must be identified and the plan, information and training amended as appropriate.

4. Testing and Maintenance plan

In accordance with section 98E of the POEO Regulation, this PIRMP will be subject to testing that ensures that information included within the plan is accurate, up to date and is capable of being implemented in a workable and effective manner.

As required by section 98E testing of the PIRMP will be undertaken on the following basis:

- Routinely at least once every 12 months.
- Within one month of any pollution incident to which the Environmental Protection Licence for the wind farm relates.
- If there is necessary modify or include something after Emergency Drill

The 12-month testing will be undertaken indicatively in January on an annual basis (unless otherwise revised during the preceding 12 months).

The testing history for the PIRMP is described in the version control at the start of this PIRMP.



Appendix 1

