



Gongues Constructions Pty Ltd

Pollution Incident Response Management Plan

Googong Stage C Water Recycling
Plant
for
Googong Township Pty. Ltd.

EPL 20788

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0.0 Revision Status

Authorised revisions will be issued to all holders of Controlled copies. The Holder is responsible for entering each new revision into this manual and to note it in the table below. All superseded pages shall be removed and destroyed.

Clause & Page No.	Current Issue No.	Current Revision No.	Revision Description	Date Issued:	Date Entered:	Entered By:
All	A	0	New Issue	21/7/17	21/7/17	NH

Approved By:	Carlos Gonçalves		
	<i>Managing Director</i>	<i>Signature</i>	<i>Date</i>
Reviewed By:	Nat Hails		
	<i>WHSQE Manager</i>	<i>Signature</i>	<i>Date</i>



1.0 Introduction

1.1 Background

The *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) has introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community. This includes a new requirement (under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act)) for holders of Environment Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

Googong Township Pty Ltd (GTPL) has obtained EPL (No. 20788) to allow for the construction of the Stage C Water Recycling Plant (WRP) (refer Appendix A) and under Section 153A of the POEO Act are required to prepare and implement a PIRMP. Copies of the EPL and PIRMP must be held on site.

Gongues Construction shall be completing the construction works. All works on site will be completed in accordance with Gongues ISO14001 accredited Integrated Management System (IMS). The site specific environmental controls are recorded in the Construction Environmental Management Plan (CEMP) and communicated to personnel via the Site Specific Induction.

1.2 Purpose and Objectives

This PIRMP (or Plan) has been developed for the construction of Stage CWRP, as part of the Googong Township Integrated Water Cycle (IWC) Project and should be read in conjunction with the Construction Environment Management Plan (CEMP).

The Stage C WRP CEMP is the key document in the Environmental Management System (EMS) for construction works and is required as per the IWC Project Condition of Approval (CoA) C19 and C20. The EMS structure, which includes this PIRMP is outlined in **Error! Reference source not found.** and described in more detail in Section 2 of the CEMP.

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection A 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.

Gongues Constructions will be responsible for the review and implementation of this Plan and related environmental documents based on detailed construction information.

1.3 Definition of 'pollution incident'

The POEO Act defines a pollution incident as:

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. Material harm is defined under the POEO Act as:

- If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial.
- If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000.

Industry is now required to report pollution incidents immediately (i.e. promptly and without delay) to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council.



2.0 Project Description

The scope of work for Stage C at Googong Water Recycling Plant for Googong Township Pty. Ltd. Includes the following:

- Site setting up, site clearing, preparation and excavation works including all temporary access provisions, site establishment, site investigation and site survey works
- Sewage mains from the existing interfaces within the WRP
- A new inlet works including mechanical screens, vortex grit removal system, screenings handling and dewatering, grit handling plant, and storage bins
- A new Emergency Detention Tank
- A new Membrane Bioreactor (MBR)
- Ancillary chemical storage dosing systems including, but not limited to, dosing skids and all associated pipework, valves and controls
- New Filtrate Storage Tank
- Additional tertiary filtration pump sets and membrane modules to integrate with the existing assets
- New UV disinfection unit to integrate with the existing assets
- New Off-spec Water Tank
- Additional below ground pits
- A new sludge digester, and relocation of the existing rotary drum thickener (with a new removable carport)
- All ancillary plant such as pumps, blower(s), fan(s), control valves, and valves
- All noise attenuation measures necessary to meet the operational noise limit for this project
- Upgrade of the existing odour control process and equipment including new covers, new ductworks, new fan, modification to the efflux cone of existing vent stack to meet the odour requirements of this project
- All civil construction work, including earthworks, stormwater drains, below ground structures, tanks, slabs, plinths, foundations, roads, pipelines, conduits, draw-pits, retaining walls and any civil structures and activities necessary for completion of the whole of the works
- All switchboards, mains and local panel, power metering, and power factor correction and harmonic mitigation measures as required by the local power authority
- All electrical power and control, and instrumentation cabling for the plant supplied
- All illumination design and provision of road lighting, task lighting and internal building lighting
- All control and telemetry requirements including site SCADA
- Overall control system fully integrating the new processes and equipment with the existing WRP



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- Connections of new equipment to for the existing standby generator to enable full operation of the plant during power outage
- Labelling and signage
- Supply of Operation and Maintenance Manuals
- Provision of training
- Support the Principal and the Owner in obtaining approval from the NSW Office of Water (NOW) for the RWQMP
- Support the Principal and the Owner in obtaining approval from the EPA with regard to effluent discharge
- Obtain approval for the relevant authorities to facilitate the construction activities required for the project
- Operate and maintain the new assets until project handover

Gongues Constructions has been appointed as the Principal Contractor in accordance with the NSW WHS Regulation (2011). The expected duration of the project is 12 months.



3.0 Hazard, Likelihood and Pre-emptive Actions to Prevent Pollution Incident Risks

3.1 Identification of pollution hazards

The management plans attached to the CEMP identify environmental and safety aspects associated with the construction of Stage C WRP. The plans that identify potential hazards relevant to pollution are outlined in the next sections.

3.1.1 Soil and water

The Soil and Water Management Plan (Appendix C of the CEMP) details risks to soil and water. Section 4.3 of the Soil and Water Management Plan identified the following pollution hazards:

- Storage of fuel and chemicals.
- Refuelling.
- Earthworks increasing the risk of erosion and sedimentation.
- Tree clearing, topsoil stripping and soil disturbance.

Waterways are at particular risk of pollution incidents, where chemicals, sediments and other hazardous substances can adversely affect aquatic environments. Controls for managing these risks are detailed in the SWMP.

3.1.2 Hazards and risks

The Project Risk Assessment & WHS Management Plan identify the safety hazards and risks that will be present throughout the works, and how they are to be mitigated. These mitigation measures are communicated to personnel via the Site Induction, Safe Work Method Statements and the daily toolbox talk which will be held each day prior to commencement of works, recorded using the F001 Hazard Assessment Check (HAC) form.

3.1.3 Waste and resources

The Waste and Resource Management Plan (Appendix A of the CEMP) details risks around waste and resources. Section 4.2 of the Waste and Resource Management Plan identified the following pollution hazards:

Liquid waste:

- Liquid waste from human waste storage facilities (sewage).

General solid waste:

- Non-recyclable and other putrescible general solid waste.
- Spoil, concrete, metallic materials, brick, rubble, soils.



3.2 Pre-emptive Measures

A list of pre-emptive actions (also referred to as mitigation measures) is listed in each management plans listed in Section **Error! Reference source not found..** Gongues will be responsible for implementing the mitigation measures to minimise or prevent the risk of pollution incidents from occurring.

Additionally, other EMS documents have been developed and can be used to identify potential hazards to human health and the environment, (e.g. environmental work method statements, environmental constraints map, and specific environmental procedures, forms and checklists).

4.0 Inventory of Pollutants

The WHS Management Plan requires that that a Safety Data Sheet (SDS) and a Hazardous and Dangerous Substances Register be kept at all chemical storage and handling locations and which will provide an inventory of the pollutants on site. Chemicals shall be stored in the container within the Gongues compound, as identified in the Site Cooperative Use Plan (Appendix J of the CEMP). There shall be a bunded area within the container as specified in section 4.3.3 of the CEMP.

The Environment Manager will:

- Ensure a current (within five years of the date of issue) SDS is available for all products and substances to be used for the work activity.
- Review the SDS to determine if the product or substance is classified as hazardous before a product or substance is used for the work activity.
- Provide all employees involved in the use of products classified as hazardous with relevant information and training to allow safe completion of the required task.
- Maintain a register of hazardous and dangerous substances used (stored in the site office).
- Ensure the quantities of chemicals are included in the hazardous substances register.
- Furthermore, all storage and use of hazardous substances and dangerous goods will be stored:
 - in accordance with the SDS and legislative requirements;
 - in their original containers with the label intact at all times OR if decanted with clear labelling describing the contents, as per GHS requirements



The Environment Manager will be responsible for monitoring the quantity of chemicals stored/used on site to ensure the manifest quantity is not exceeded in accordance with the Regulations.

5.0 Safety Equipment

A list of mitigation measures is listed in the WHS Management Plan and Safe Work Method Statements to prevent risks to human health. Safety equipment includes:

	Type
Signs:	Site contact personnel & phone number
	Notice- All Visitors must report to site office
	Site Office
	Notice- All Visitors must sign in
	Danger- Construction Site
	Danger- High Voltages Overhead
	Emergency Evacuation or Muster Point' (Green)
	All Electrical tools Must be Tested & tagged before being used on site
	First Aid
	Fire Extinguisher
	SDS
	Confined spaces
PPE:	Dust Masks
	Ear Plug
	Safety glasses – tinted & clear
	Ninja Gloves XL
	Disposable overalls
	Hat brims
Other:	Garbage Bin
	Plastic/ rubber gloves
	Duct tape
	Blue/White tape
	Fire Extinguisher
	Spill Kit
	First Aid kit
	Fog Horn (emergency evacuation horn)
	Lead hooks or stands

6.0 Maps



Fig. 1: Environmental Constraints Map

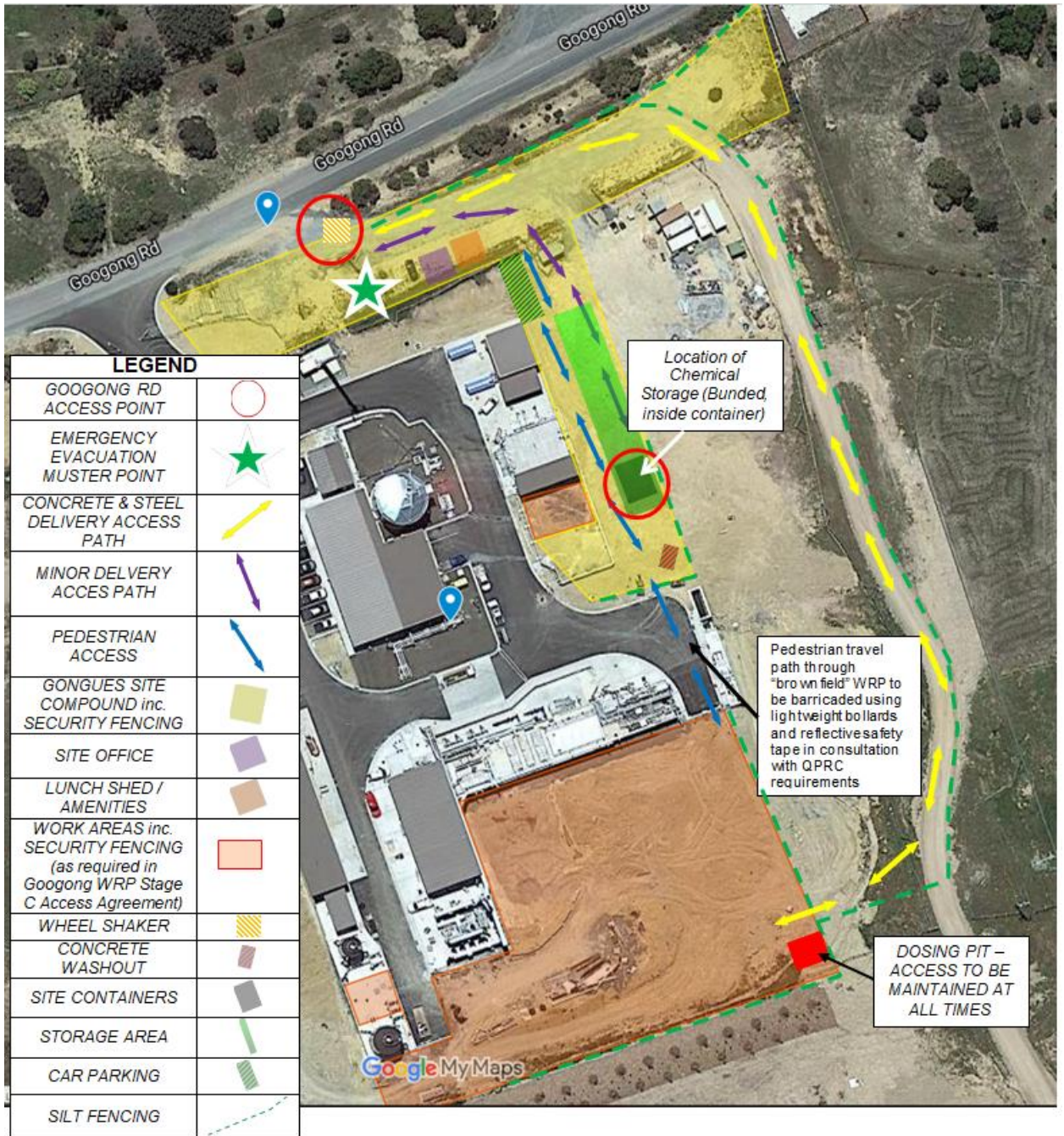


Fig 2: Site Layout Showing Chemical Storage Area



7.0 Incident Management and Notification

Incidents are to be managed in accordance with Gongues **IMS P11 Emergency Preparedness and Response Procedure**. Details of management for incidents, including environmental incidents, can be found in the Emergency Response Plan created for the project. This plan can be found in the Safety Folder on site.

An environmental incident is an unplanned event, which occurs on site and causes significant adverse environmental impacts. Environmental incidents are to be dealt with as soon as possible, in order to limit the damage the environment. The general emergency response to environmental incidents is:

1. Ensure site safety, move people from immediate area
2. Warn traffic of any hazard which affects traffic (use lights, warning signs, etc.).
3. Take any practical steps to contain the hazard and prevent it from spreading. This may include notifying fire or emergency services. Refer to the Emergency Spill Procedure, Appendix G of the CEMP
4. Site supervisor is to inform Contracts Manager or WHSQE Manager of incident at the earliest possible opportunity
5. Contract Manager to notify client via phone and follow up with email as appropriate, and report to relevant authority (if applicable)
6. Decide with client and relevant authority how to clean up and remediate the site.

Workers are to report all environmental incidents to the Site Supervisor immediately.

Any incident that occurs must be reported and investigated. The procedure for internal reporting an incident is as follows:

1. Site supervisor is to inform Contracts Manager or WHSQE Manager of incident at the earliest possible opportunity
2. The Contract Manager or WHSQE Manager is to inform the Managing Director of the Incident. The Contract Manager shall report the incident to the client immediately.
3. **IMS F003 Hazard/ Incident Report** is to be completed. All incidents are to be recorded in the **F004 Incident NCR and Hazard Register**. The incident report shall be provided to the



client within 24 hours of the incident occurring

4. All incidents are to be investigated to ensure that steps are taken to prevent further incidents in the future. The information from the **F003 Hazard/Incident Report** will be used to facilitate this investigation. This is to be conducted in accordance with the **IMS P11 Emergency Preparedness and Response Procedure**

Where the environmental incident has the possibility to cause harm or damage to the environment beyond the work area the incident is to be reported to the Environmental Protection Authority (EPA) by the Site Superintendent. Local council and SafeWork NSW may also require notification.

Refer to the site Emergency Response Plan for further details of response procedures.



8.0 Emergency Contact Details

Emergency contact/organisation	Name	Contact details
BMCA Superintendent	Geoff Gardner	0432 565 123
Gongues Site Supervisor	Herculano Gonçalves	0407 245 672
<i>Gongues Environmental Management Representative</i>	<i>Steve Cooper</i>	<i>0412 545 569</i>
<i>Gongues Contract Manager</i>	<i>Lachlan Bryan</i>	<i>0419 630 292</i>
<i>Gongues WHSQE Manager</i>	<i>Nat Hails</i>	<i>0448 104 952</i>
OEH – EPA	Pollution line	131 555
OEH – EPA (South East Region)	Julian Thompson	(02) 6229 7002
DP&I	Lisa Mitchell	(02) 9228 6284
NSW Health	N/A	(02) 9391 9000
Police	N/A	000 (or 112 from mobiles)
Local Police	N/A	131 444
Ambulance	N/A	000 (or 112 from mobiles)
Canberra Hospital	N/A	(02) 6244 2222
NSW Rural Fire Service	N/A	000 (or 112 from mobiles)
Gas/electricity	N/A	131 909
Queanbeyan City Council	N/A	(02) 6285 6000 After hours (02) 6298 1234
Icon Water	N/A	6248 3111
WorkCover NSW	N/A	13 10 50
Telstra	N/A	132 999
ACT Territory and Municipal Services	N/A	13 22 81
WIRES	N/A	1300 194 737



9.0 Emergency response and minimising harm to persons

An Emergency Response Plan has been formulated for this project, providing details of response procedures for specific safety and environmental risks.

General safety information, such as location of medical equipment, medical facilities and first aid trained personnel on site is included in the Site Specific Induction. This information shall also be posted on the walls of the site office for ease of access.

10.0 Community Notification

Local community stakeholders that may be potentially affected by a pollution incident include nearby residents, the ranger station and the Icon Water water treatment plant or downstream water users. In the unlikely event of a pollution incident that could result in impacts outside the Stage C WRP site, community stakeholders will be notified immediately by one of the following methods:

- Door knocking by GTPL representative or emergency services personnel (dependent on nature of event).
- Phone call by GTPL representative.
- Other methods determined by the GTPL as deemed necessary or as advised by a particular agency (eg follow up letters/emails, or website update).

All communications will be undertaken in accordance with the Community Engagement and Stakeholder Management Plan that includes a Community Information Plan, which has been prepared for Stage 1 of the IWC Project.

11.0 Staff Training

Details regarding the nature and objectives of any staff competence, training and awareness are outlined in Section 3.3 of the CEMP. Several forms of environmental training will be provided, including:

- A project site induction, including environmental roles and responsibilities.
- Toolbox talks.
- Safe Work Method Statements for site activities which present particular environmental risks.

The Site Supervisor will conduct training. A register of all project site inductions and environmental training carried out will be maintained.



Section 8 of the WHS Management Plan also provides details on induction training specifically related to safety and environmental issues.

12.0 Testing of the PIRMP

12.1 Timing

The POEO (General) Regulation 2009 (Clause 98E) states for testing of the PIRMP:

1) *The testing of a plan 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 the plan is capable of being implemented in a workable and effective manner.*

2) *Any such test is to be carried out:*

- *Routinely at least once every 12 months, and*
- *Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.*

In accordance with the Regulation, testing of this PIRMP will occur:

- Initially within three months after commencement of construction of Stage C WRP.
- Every 12 months thereafter, while construction continues, and
- Within 1 month of any pollution incident during the construction of Stage C WRP

12.2 Records

Testing of the PRIMP will involve:

- Desk top simulation; or
- Practical exercise or drill.

The Environment Management Representative will record the outcomes of each test by the using the **F204 Emergency Evacuation Drill Response** form. If the test identifies any shortcomings, especially in the implementation of the Spill Response Procedure or Dangerous Goods Hazardous Substances Management Procedure, this PIRMP will be corrected and/or appropriate non-conformance actions will be undertaken in accordance with **IMS P10 Non Conformance Procedure**. This would include any non-conformance or opportunities for improvement to be recorded through the F004 non-conformance register.



Appendix A – EPL 20788

