



# Moorebank Logistics Park Pollution Incident Response Management Plan (PIRMP)



Client	Qube RE Services No.2 Pty Ltd
Report No	MP-PIRMP -01
Revision	3
Date	29/06/2020



# Moorebank Logistics Park Pollution Incident Response Management Plan (PIRMP)

## Prepared for

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## Quality Information

Document Title	Moorebank Logistics Park Pollution Incident Response Management Plan (PIRMP)
Report no.	MP-PIRMP-01
Date	29/06/2020
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Reviewed by	Noel Storan
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## Document Control

Version	Date	Description of Revision	Prepared By	Reviewed By	Approved By
0	16/10/2018	Final	LRV	NB	NS
1	10/05/2019	General Update for Variation EPL	LRV	NS	NB
2	25/06/2019	Minor update to Section 6.2.3	LRV	NS	NB
3	29/06/2020	General Update	LN	NS	NB



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## Glossary/Abbreviations

Term	Meaning
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
DPIE	Department of Planning, Industry and Environment
EPA	NSW Environment Protection Authority
EPL	Environment Protection License
ISO	International Organization for Standardization
LGA	Local Government Authority
OEHL	Office of Environment and Heritage
MPE	Moorebank Precinct East
MPE Stage 1	Moorebank Precinct East Stage 1 – As defined in the State Significant Development (SSD) consent (SSD – 6766)
MPE Stage 2	Moorebank Precinct East Stage 2 – As defined in the State Significant Development (SSD) consent (SSD – 7628)
MLP	Moorebank Logistics Park
MPW	Moorebank Precinct West
MPW – Early Works	Moorebank Precinct West – Early Works consent as defined in the State Significant Development (SSD) consent (SSD – 5066)
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PIRMP	Pollution Incident Response Management Plan
PC	Principal Contractor
PPE	Personal Protective Equipment
The Premises	Part Lot 1 DP1197707, Lot 100 DP1049508 and Lot 1 DP1048263 collectively referred to as Moorebank Logistics Park
Qube	Qube Re Services (No.2) Pty Limited
RMS	Roads Maritime Service
SSD	State Significant Development as defined in at Division 4.7 of the <i>Environmental Planning and Assessment Act 1979</i>



# 1 Introduction

## 1.1 Premises details

- 1.1.1 The Moorebank Logistics Park (the Premises) is situated within the Liverpool City Council and is located approximately 2.5km from the Liverpool City Centre and approximately 27km south west of the Sydney Central Business District (CBD).
- 1.1.2 The Premises is legally defined as: LOT 1 DP 1048263, LOT 100 DP 1049508, PART LOT 1 DP 1197707, PART LOT 2 DP 1197707. The Premises are defined in the Appendix A of this Pollution Incident Response Management Plan (PIRMP).
- 1.1.3 The development of the Premises involves the construction of intermodal facilities which will be linked to Port Botany, the interstate road networks and the interstate freight rail network.

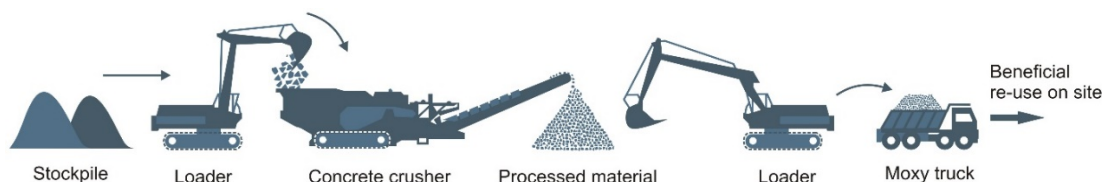
## 1.2 Context

- 1.2.1 It is the intention of Qube Re Services (No.2) Pty Limited (QUBE) to engage a Principal Contractor(s) (PC) to carry out the scheduled activities as part of construction works on the Premises. The PC shall carry out the scheduled activities in accordance with Environment Protection Licence (EPL) 21054 and the Construction Environmental Management Plan (CEMP) applicable to the portion of the Premises where the scheduled activity is being carried out.

## 1.3 EPL Overview

- 1.3.1 An Environment Protection Licence (EPL) No 21054 was issued to QUBE for the Premises by the NSW Environmental Protection Authority (EPA) on the 4<sup>th</sup> June 2018 for the activity of crushing grinding and separating demolition material. This EPL covered the *Crushing, grinding and separating* (Figure 1) as the only scheduled activity allowed on the site. An amendment of this EPL was issued on the 18<sup>th</sup> April 2019, Variation No. 1 to include the *Extractive Activities* as another scheduled and fee-based activity allowed to this site as specified in the Table 1.

Figure 1 Crushing, Grinding and Separating Flow Chart



- 1.3.2 Under section Part 5.7A Section 153A of the Protection of the *Environment Operations Act 1997* (POEO Act) all EPL holders must prepare a Pollution Incident Response Management Plan (PIRMP).
- 1.3.3 Details of the EPL are given in Table 1.





Table 1 Details of EPL

<b>EPL No.</b>	21054
<b>Anniversary Date</b>	4-June
<b>Licensee</b>	QUBE RE SERVICES (No.2) PTY LIMITED
<b>Licensee's Address</b>	Level 27/45 Clarence St., Sydney, NSW,2000
<b>Premises</b>	Moorebank Precinct, Moorebank, NSW, 2170 1.1.1 LOT 1 DP 1048263, LOT 100 DP 1049508, PART LOT 1 DP 1197707, PART LOT 2 DP 1197707. The Premises are defined in the Appendix A of this PIRMP.
<b>Scheduled Activities</b>	Crushing, Grinding or Separating (Figure 1) Extractive Activities
<b>Scale</b>	Crushing, Grinding or Separating >100,000-500,000 tonnes annual processing capacity Extractive Activities >500,000-2,000,000 tonnes annual processing capacity
<b>Other Activities</b>	This licence applies to all other activities carried on at the Premises, including: <ul style="list-style-type: none"> <li>▼ Bulk Earthworks "cut and fill"</li> <li>▼ Importing Fill</li> <li>▼ Road Construction</li> </ul>

## 1.4 Plan Availability

- 1.4.1 A copy of this plan is to be maintained at the site office on the Premises.
- 1.4.2 This plan will be made available to anybody that request it on the 1800 986 465.
- 1.4.3 A copy of this plan and its revisions will be available 14 days after the issue or revision of this document on site and on line at the website: [www.simta.com.au/project-wide](http://www.simta.com.au/project-wide).

## 1.5 Plan Objectives

- 1.5.1 The objectives of this pollution incident response management plan are to:
- ▼ Ensure comprehensive and timely communication about a pollution incident to staff at the Premises, the EPA, other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkSafe NSW and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
  - ▼ Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and,
  - ▼ Ensure that the plan 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.



## 2 Legislative and Regulatory Requirements

### 2.1 Relevant Legislation

- 2.1.1 Key environmental legislation relating to pollution incident response management includes:
- ▼ Protection of the Environment Operations Act 1997 (POEO Act);
  - ▼ Protection of the Environment Operations (General) Regulation 2009; and
  - ▼ Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.

### 2.2 Guidelines and Standards

- 2.2.1 Key environmental guidelines relating to pollution incident response management includes:
- ▼ Environmental guidelines: Preparation of pollution incident response management plans, 2012.
  - ▼ RMS: Environmental Incident Classification and Reporting Procedure Sep 2017.

### 2.3 Legislative Requirements

- 2.3.1 Key environmental legislation relating to pollution incident response management are summarised in Table 2:



Table 2 Plan requirements

General Requirements for preparing PIRMPs	Legislative Reference of POEO Act.	Legislative Reference of POEO (G) Regulation.	Reference Section of this Plan
<b>Form of plans</b>			
▼ Written form and available at the premises.	Section 153D	Section 98B (1)	Section 1.4
▼ Made available on request.	Section 153D	Section 98D (1)	Section 1.4
▼ May form part of another document (i.e. existing emergency plan or incident management plan) as long as it is readily identifiable as such in that other document and it meets the requirements of section 153C of POEO Act and the POEO (G) Regulation.		Section 98B (2)	N/A
▼ Made publicly available in the 14 days after it has been prepared: i) At an accessible website. ii) If there is not a website, providing a copy of the plan to anybody that requests it.		Section 98D (2)	Section 1.4
<b>Main hazards</b>			
▼ Description and likelihood of the main hazards to human health or the environment associated with the activity undertaken at the premises.		Clause 98C (1)(a) and (b)	Section 4.5
<b>Procedures</b>			
▼ Procedures to be followed by the EPL holder or the occupier of the premises, in notifying: a) The owners or occupiers of premises in the premises. b) The local authority . c) Any persons or authorities that required to be notified by Part 5.7 of the Act.	Section 153C (a)		Section 6
▼ The procedures to be followed for co-ordinating with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident.	Section 153C (c)		Section 6
<b>Actions</b>			
▼ Pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment.		Clause 98C (1)(c)	Section 4.4
▼ A detailed description of the action to be taken immediately after a pollution incident, to reduce or control any pollution.		Clause 98C (1)(l)	Section 4.4
<b>Contacts Details (name, role and 24h phone number)</b>			
▼ Of the key personnel responsible for activating the plans and managing the response.		Clause 98C (1) (g)	Section 7
▼ Of the EPA, the local council, NSW Ministry of Health, WorkSafe NSW and Fire and Rescue NSW, relevant to the licensee's premises.		Clause 98C (1) (h)	Section 7
▼ Of any other organisation or agency that needs to be advised).			
<b>Inventory</b>			
▼ Inventory of potential pollutants to be kept at the premises.			Section 4.1



General Requirements for preparing PIRMPs	Legislative Reference of POEO Act.	Legislative Reference of POEO (G) Regulation.	Reference Section of this Plan
<b>Safety Equipment</b>			
▼ A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.		Clause 98C (1) (f)	Section 5.2
<b>Community Liaison</b>			
▼ Details of the mechanisms that will be used for communicating with the community in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.		Clause 98C (1) (i)	Section 6.3
<b>Risk Minimisation</b>			
▼ Details of the arrangements for minimising the risk of harm to any persons on the premises.		Clause 98C (1)(j)	Section 4.5
▼ a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.			
<b>Map or set of Maps</b>			
▼ Detailed map or maps showing the location of: <ul style="list-style-type: none"> <li>• The premises which the license relates.</li> <li>• The surrounding area likely to be affected by a pollution incident.</li> <li>• The location of any pollutants.</li> <li>• The location of any storm water drains.</li> <li>• The discharge locations of the storm water.</li> </ul>		Clause 98C(1)(k)	Appendix A
<b>Staff Training</b>			
▼ The nature and objectives of any staff training program in relation to the plan.		Clause 98C(1)(m)	Sections 5.3
<b>Plan Testing</b>			
▼ The dates on which the plan has been tested and the name of the person who carried out the test.	Section 153E	Section 98E and 98C (n), (p), (f) and (g)	Section 8.3
▼ The manner in which the plan is to be tested and maintained.			
<b>Plan Updates</b>			
▼ The dates on which the plan is updated.		Section 98C (o)	Section 9.1



## 3 What is a Pollution Incident?

### 3.1 Pollution Incident Definition

#### 3.1.1 For the purposes of this plan 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.*

### 3.2 Pollution Incidents that require notification

#### 3.2.1 A pollution incident is required to be notified if there is a risk of 'material harm to the environment' as a result of activities undertaken by the PC or delegate in relation to the scheduled activities. Material Harm is defined in section 147 of the POEO Act as:

(a) harm to the environment is material if:

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

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), 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.

#### 3.2.2 In the event of a pollution incident the PC shall notify the Superintendent who will determine whether or not the incident is required to be notified.

#### 3.2.3 In the event of a pollution incident the following stakeholders must be notified immediately by the PC;

- ▼ NSW EPA;
- ▼ NSW Department of Planning, Industry and Environment (DPIE);
- ▼ NSW Health;
- ▼ Fire and Rescue NSW;
- ▼ WorkSafe NSW; and
- ▼ Local Council.

### 3.3 Pollution Incident Types

#### 3.3.1 Pollution incidents that could potentially occur at the Premises and which are covered by this plan include;



- ▼ material, such as waste materials, dust, hydrocarbons, that travel beyond the site boundary causing or potentially causing adverse impact to the environment or community; and,
- ▼ discharge of waters from site not in accordance with the EPL (21054) conditions.

**3.3.2** Small spills that do not leave the site boundary and which are cleaned up without material harm to the environment or residual environmental impact will be managed and will not require notification to the EPA or other authorities, however all such incidents are to be recorded, categorised and reported in accordance with the relevant Project CEMP.

**3.3.3** The three categories of environmental incidents that have been adopted from and described in Table 16 Environmental Incident Classification from the CEMP are detailed in Table 3.

Table 3 Environmental Incident Classification

Incident Category	Direct Cost including clean up	Impact
<b>Class 1</b>	Up to \$10,000	<ul style="list-style-type: none"> <li>▼ Pollution or degradation which has low severity impacts on the community and/or environment in the short-term (&lt;1 month duration) and is fully reversible with no residual impacts.</li> <li>▼ Harming a protected animal that is not vulnerable or threatened.</li> </ul>
<b>Class 2</b>	\$10,000 to \$100,000	<ul style="list-style-type: none"> <li>▼ Pollution or degradation which has moderate severity impacts on the community and/or environment (1-3 months duration) but is fully reversible with no residual impacts.</li> <li>▼ Harming an animal that is (or is part of) a vulnerable species or vulnerable ecological community.</li> <li>▼ Picking a plant that is (or is part of) a vulnerable species or vulnerable ecological community.</li> </ul>
<b>Class 3</b>	More than \$100,000	<ul style="list-style-type: none"> <li>▼ Pollution or degradation which has high severity impacts on the community and/or environment and may have irreversible residual impacts.</li> <li>▼ Harming an animal that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) (S2.1).</li> <li>▼ Picking a plant that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community).</li> <li>▼ Damaging a declared area of outstanding biodiversity value.</li> <li>▼ Knowingly damages any habitat of a threatened species or threatened ecological community.</li> <li>▼ Contravention of a stop work order.</li> </ul>



## 4 Pollution Risk Assessment

### 4.1 Pollutant Inventory

- 4.1.1 A list of potential pollutants, the estimated quantities that may be stored at the Premises, and the approximate locations of each pollutant is detailed in Table 4 below.

Table 4 Inventory of pollutants

Pollutant	Estimated Quantity	Location
Hydraulic oil, transmission fluid, engine oil, anti freeze, gearbox and diff oils	10,000 litres	Likely to be stored in drums on bunded pallets in the mechanic workshop

### 4.2 Risk Assessment Overview

- 4.2.1 The risk assessment process documented in this Project Risk Assessment is based on the principles of ISO3100:2009 Risk Management – Principles and Guidelines. This process provides a structured approach to assessing risk of a pollution incident.

### 4.3 Risk Analysis

- 4.3.1 The risk matrix used to evaluate the risk on this project is illustrated below where the risk is assigned a score based on the consequence rating, Table 6, and the Likelihood rating, Table 5. The score assigned to the risk corresponds to a risk rating from low to extreme as illustrated in table 8.

- 4.3.2 The PC shall carry out a detailed risk assessment in accordance with the CEMP.

Table 5 Classification of Likelihood

Probability	Description	Likelihood Rating
Almost Certain	More than once a month	A
Likely	Less than once a month, but more than once per year	B
Possible	Less than once per year, but more than once per five years	C
Unlikely	Less than once per five years	D
Rare	Unlikely to ever occur	E



Table 6 Classification of Consequence

Consequence Level	Negligible	Minor	Moderate	Major	Severe
Consequence Score	1	2	3	4	5
Consequence Criteria					
Environmental Consequence	Minor localised environmental incident	On site environmental incident immediately resolved	On site environmental incident with detrimental effects	Offsite environmental incident with detrimental effects	Offsite environmental incident with significant detrimental effects

Table 7 Qualitative Risk Evaluation Matrix

Consequence Rating	Negligible	Minor	Moderate	Major	Severe
Likelihood Rating	(1)	(2)	(3)	(4)	(5)
Almost Certain (A)	11	16	20	23	25
Likely ((B))	7	12	17	21	24
Possible (C)	4	8	13	18	22
Unlikely (D)	2	5	9	14	19
Rare (E)	1	3	6	10	15

Table 8 Risk Evaluation Summary

Risk Rating	Risk Score	Risk Acceptability
Low	1 – 5	Acceptable
Moderate	6 – 9	Acceptable with management controls
High	10 - 17	Unacceptable
Extreme	18 - 25	Unacceptable

## 4.4 Risk Identification

4.4.1 The potential risks associated with the activities being carried out on the Premises have been identified and assessed. The details of this risk assessment are detailed in Table 9.

## 4.5 Pre-emptive Actions/ Controls

4.5.1 Pre-emptive actions are those actions to be taken to minimise or prevent any risks of harm to human health or the environment arising from the scheduled activity. The specific pre-emptive actions to be undertaken to mitigate the risks on the Premises are detailed in Table 9.





*Table 9 Pollution Incident Residual Risk Assessment (after controls)*



Potential Hazard	Potential Risk	Control Measure	Responsibility	Consequence	Likelihood	Residual Risk Rating
Spillages of contaminants into waterways (chemical, fuel, hazardous liquids...)	Discharge into the storm water	<ul style="list-style-type: none"> <li>▼ Construction Environmental Management Plan (CEMP) with an Incident Response Plan and Spill Management Procedure</li> <li>▼ Run-off controls</li> <li>▼ Provision of Material Safety Data Sheet</li> <li>▼ Plan and implement works to minimise the possibility of pollution</li> <li>▼ Use and storage of chemicals strictly in accordance with relevant legislation, manufacturer and the Safety Data Sheets.</li> <li>▼ Spill kits located with adequate quantities of emergency response material are readily available in the proximity to oil storage areas or next to the machinery that is carrying out the activity, to contain the spillage on time</li> <li>▼ Where safe to do so, install containment measures such as sandbags, booms, earth bunds or cut drains to capture and retain spilled material and prevent it from leaving site, entering any watercourse or impacting on vegetation stands</li> </ul>	Principal Contractor Environmental Manager	Moderate	Unlikely	<b>Moderate</b>
Sediment tracking off -site	Sediment on public roads	<ul style="list-style-type: none"> <li>▼ Import Fill Material protocol</li> <li>▼ Use of Wheel wash before leaving the site</li> <li>▼ Tool boxes to truck drivers to explain wet days procedures</li> <li>▼ Use of road sweepers</li> </ul>	Principal Contractor Environmental Manager	Moderate	Rare	<b>Low</b>
Spillage from machinery or vehicles	Discharge onto the land	<ul style="list-style-type: none"> <li>▼ Provision of a CEMP to include an Incident Response Plan and Spill Management Procedure</li> <li>▼ Plant Inspection checklist daily</li> <li>▼ Spill kits with adequate quantities of emergency response materials located in the proximity to oil storage areas</li> </ul>	Principal Contractor Environmental Manager	Moderate	Rare	<b>Low</b>



Potential Hazard	Potential Risk	Control Measure	Responsibility	Consequence	Likelihood	Residual Risk Rating
Discovery of potentially contaminated soil/material (including but not limited to: Asbestos, PFAS, ASS, hydrocarbon compounds, contaminated import material)	Contaminated soil and ground water/surface waters. Potential health risk	<ul style="list-style-type: none"> <li>▼ CEMP and associated sub plans</li> <li>▼ Environmental testing and verification of the import material prior to arrival on site</li> <li>▼ Site inspections</li> <li>▼ Document review of previous uses of the land Construction work to follow the CEMP and associated sub plans</li> <li>▼ PCs to be appropriately qualified and train in handling and management contaminated materials /ASS</li> </ul>	Principal Contractor Environmental Manager	Moderate	Unlikely	<b>Moderate</b>
Fugitive dust or particulate matter (PM) generated during the activity	Effects on the Air Quality	<ul style="list-style-type: none"> <li>▼ Use of water carts</li> <li>▼ CEMP</li> <li>▼ Procedures to reject excessively smoky trucks visiting the site based on visual inspection.</li> <li>▼ Implementation and communication of anti-idling policy for trucks</li> <li>▼ Complaints procedure for the community to report on excessive idling and smoky vehicles</li> </ul>	Principal Contractor Environmental Manager	Moderate	Rare	<b>Low</b>
Fire	Smoke (due to onsite fire) causing impact to human health (inhalation)	<ul style="list-style-type: none"> <li>▼ Emergency response/evacuation procedures.</li> <li>▼ Fire/Smoke Monitoring system</li> <li>▼ Fire extinguishing equipment located in all sheds and other locations around the site.</li> </ul>	Principal Contractor Environmental Manager	Moderate	Rare	<b>Low</b>
Noise emissions from site	May cause disruption and impact on human health	<ul style="list-style-type: none"> <li>▼ Provision of a Construction Noise and Vibration Management Plan (CNVMP)</li> <li>▼ Provision of barriers and shielding when required</li> <li>▼ Noise activities to be located in selective locations to minimise the acoustic levels</li> <li>▼ Operating hours as approved by consent conditions.</li> <li>▼ Complaints handling procedure.</li> <li>▼ Complaints procedure available during hours of operation.</li> <li>▼ Plant and Equipment regularly inspected and maintained to ensure optimal operating condition. Plant and equipment operators instructed how to minimise noise generation.</li> </ul>	Principal Contractor Environmental Manager	Moderate	Rare	<b>Low</b>



## 5 Preparedness

### 5.1 Responsibilities

5.1.1 The following table illustrate these roles and responsibilities for the scheduled activities.

Table 10 Roles and responsibilities

Roles	Responsibilities
<b>Principal</b>	<ul style="list-style-type: none"> <li>✓ Compliance with EPL and PIRMP; and,</li> <li>✓ Organize annual audits.</li> </ul>
<b>Principal Representative</b>	<ul style="list-style-type: none"> <li>✓ Compliance with EPL, CEMP, PIRMP.</li> </ul>
<b>Contractor's Project Manager (Contractor's PM)</b>	<ul style="list-style-type: none"> <li>✓ Compliance with EPL, CEMP, PIRMP;</li> <li>✓ Oversees the implementation and maintenance of the CEMP and this PIRMP;</li> <li>✓ Report environmental incidents to the Principal Representative;</li> <li>✓ Sign off on all environment and sustainability inspections;</li> <li>✓ Monitoring;</li> <li>✓ Internal audits;</li> <li>✓ Incident notifications;</li> <li>✓ Take action to resolve environmental non-compliances and incidents;</li> <li>✓ Authorise expenditure to implement environmental management requirements within limits of authority as defined in the Principal's Representatives Project requirements;</li> <li>✓ Undertake ICAM investigations;</li> <li>✓ Review audit corrective actions and take action as necessary to ensure timely close out of issues;</li> <li>✓ Be contactable 24 hours a day;</li> <li>✓ Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm; and,</li> <li>✓ Stop work if there is potential for a safety or environmental incident to occur.</li> </ul>
<b>Contractor's Construction Manager (Contractor's CM)</b>	<ul style="list-style-type: none"> <li>✓ Compliance with EPL, CEMP, PIRMP;</li> <li>✓ Communicating with all personnel and sub-contractors regarding compliance with the CEMP;</li> <li>✓ Identifying resources required for implementation of the PIRMP;</li> <li>✓ Take action to resolve non-compliances and incidents; and,</li> <li>✓ Be contactable 24 hours a day.</li> </ul>
<b>Contractor's Community Liaison Manager (Contractor's CLM)</b>	<ul style="list-style-type: none"> <li>✓ Implement the Community Consultation Strategy;</li> <li>✓ Assist the Contractor's EM in consulting regulatory agencies and community;</li> <li>✓ Communicate potential environmental impacts to the community and all stakeholders;</li> <li>✓ Manage the resolution of environmental complaints; and,</li> <li>✓ Act as a 24-hour contact (if other staff as outlined above are not available).</li> </ul>



Roles	Responsibilities
<b>Contractor Environmental Manager (Contractor's EM)</b>	<ul style="list-style-type: none"><li>▼ Check and monitor the implementation of this PIRMP;</li><li>▼ Report to the Contractor's CM on environmental issues;</li><li>▼ Monitor the rectification of incidents;</li><li>▼ Provide technical advice to personnel and management in the review of work methods;</li><li>▼ Development, implementation, monitoring and updating of the PIRMP;</li><li>▼ Ensure environmental risks of the Project are identified and appropriate mitigation measures implemented;</li><li>▼ Develop environmental site induction and maintain a register of attendance;</li><li>▼ Present and participate in toolbox meetings;</li><li>▼ Manage environmental document control, reporting, inductions and training;</li><li>▼ Oversee site monitoring, inspections and internal audits;</li><li>▼ Manage all sub-contractors and consultants with regards to environmental matters, including assessing their environmental capabilities, identifying additional training needs and overseeing the submission of their environmental documents;</li><li>▼ Act as a 24-hour contact (if other staff as outlined above are not available);</li><li>▼ Liaise with construction team as required in order to implement the ISCA requirements;</li><li>▼ Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm; and,</li><li>▼ Cooperate and participate in audits and action results of any audit findings.</li></ul>
<b>Site Supervisor</b>	<ul style="list-style-type: none"><li>▼ Implement environmental controls on-site;</li><li>▼ Present and participate in toolbox talks and meetings;</li><li>▼ Monitor the skills required by workers to effectively implement the PIRMP;</li><li>▼ Meet environmental reporting requirements of the Project; and,</li><li>▼ Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm.</li></ul>
<b>Technical Advisor</b>	<ul style="list-style-type: none"><li>▼ Development and compliance with the PIRMP.</li></ul>
<b>All Personnel</b>	<ul style="list-style-type: none"><li>▼ Minimise the potential of pollution of land, air and water;</li><li>▼ Preserve the natural and cultural heritage environment;</li><li>▼ Minimise the occurrence of offensive noise;</li><li>▼ Take all feasible and reasonable steps to comply with the requirements of this PIRMP;</li><li>▼ Comply with the relevant Acts, Regulations and Standards;</li><li>▼ Comply with the Project policies and procedures;</li><li>▼ Comply with the CEMP and sub-plans;and</li><li>▼ Comply with lawful management directions.</li></ul>



## 5.2 Safety Equipment

- 5.2.1 The Principal Contractor shall supply all safety equipment including Personal Protective Equipment (PPE), spill kits, ventilated lockable chemical storage areas in accordance with the CEMP and Workplace Health and Safety Management Plan.

## 5.3 Training

- 5.3.1 The Principal Contractor must ensure all personnel working on the licensed activity on the Premises will be trained as follows:
- ▼ Existing employees/existing contractors- during the regular tool boxes and pre-starts meetings;
  - ▼ New employees/new contractors informed of the location of this PIRMP when inducted to the site; and,
  - ▼ Personnel involved in emergency response activities- will be provided with specific training.
- 5.3.2 Additionally, the Principal Contractor must provide specific training will be in the following areas
- ▼ Spill minimisation measures and spill response.
- 5.3.3 The Principal Contractor must maintain records of the staff training. Records must be available upon request by the Principal.

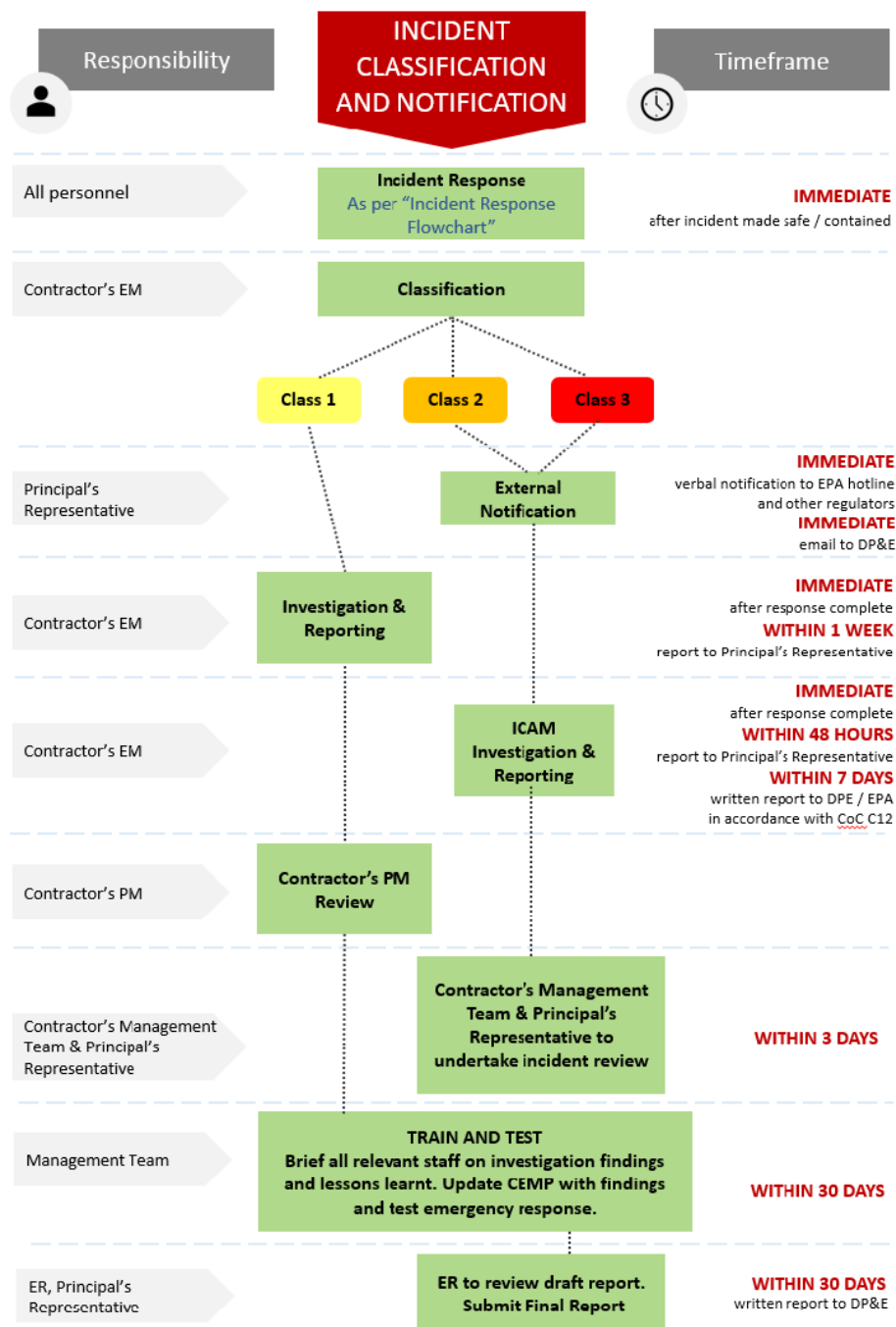


## 6 Implementation

### 6.1 Pollution Incident Response Procedure

- 6.1.1 The Principal Contractor must respond to the incident in accordance with the CEMP, the Moorebank Intermodal Precinct Incident Management Process (Appendix B) and this PIRMP.
- 6.1.2 The procedure to follow in the case of a pollution incident on the Premises related to the licensed activities are given in Figure 2 below.

Figure 2 Pollution Incident Response Management Process as per relevant CEMP





## 6.2 Notification

6.2.1 In accordance with the Moorebank Logistics Park Incident Management Process, the Contractor must notify the Superintendent and the Principal:

- ▼ immediately of any accident or incident that involves serious injury, hospitalisation or a fatality; otherwise
- ▼ within 15 minutes of any accident or incident that involves attention of media, Minister for Finance, Minister for Infrastructure, or Local Members; otherwise
- ▼ within 2 hours of any WHS or environmental incident that is notifiable; otherwise
- ▼ as soon as practicable of any incident which had actual or potential significant on-site or off-site impacts on human health or the environment.

6.2.2 The Contractor must provide full written details of the incident and corrective actions to the Principal and the Superintendent of the incident within an Incident Report, Corrective Action Report and Monthly Report. The information that needs to be reported includes:

1. Time, date, location and likely duration of incident;
2. Location of place where pollution is occurring or likely to occur;
3. Type of incident (e.g. chemical spill, water pollution etc.);
4. Extent of incident (e.g. magnitude of spill, area covered etc.); and
5. Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.
6. Notifications to authorities must be verbal communication (i.e. – via telephone call.)

6.2.3 In accordance with Section 3, where an incident also requires notification to the EPA and to inform the DPIE and/or Office of Environment and Heritage (OEH), the incident report prepared for the purposes of notifying the EPA and to inform DPIE and/or OEH is considered adequate to meet the requirements to notify the Superintendent.

6.2.4 The Principal Contractor must record information provided during notification of a pollution incident in accordance with the CEMP.

## 6.3 Community Notification

6.3.1 In the event of a pollution incident, notifications will be communicated to potentially affected community members in accordance with the CEMP via email, telephone or face to face in consultation with relevant authorities.

6.3.2 Early warnings to affected community must be given when practicable.

6.3.3 Community liaison officers must advise of any relevant information during Community Consultation Committee meetings. This must include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water creeks or rivers affected by a pollutant discharge.





## 6.4 Clean-Up

- 6.4.1 In the event of a pollution incident the Principal Contractor must clean up the pollution in consultation with the relevant authorities and in accordance with the CEMP.

## 6.5 Incident Investigation

- 6.5.1 Following a pollution incident, the Principal Contractor must carry out an investigation in accordance with the CEMP.

## 7 Contact Details

- 7.1.1 In the event of a pollution incident the external agencies and all relevant stakeholders of the project must be contacted immediately in accordance with the flowchart in Figure 2.
- 7.1.2 Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts.
- 7.1.3 Details for external agencies and key project stakeholders are provided below.

Table 11 Contacts Details for external agencies

Department	Contact Details
Environment Protection Authority	13 15 55
Department of Planning, Industry and Environment	compliance@planning.nsw.gov.au
Local Council	
Liverpool City Council	1300 36 2170
Campbelltown City Council	(02) 4645 4000
Liverpool Public Health Unit (South Western Sydney Local Health District).	9794 0855
NSW Ministry of Health	(02) 9391 9000
SafeWork NSW	13 10 50
Fire and Rescue NSW - Liverpool	(02) 9824 0521



Table 12 Contacts Details for key personnel

Role	Company	Name	Telephone	Email
Principal	QUBE	Melissa Jimenez	0451 122 069	Melissa.Jimenez@qube.com.au
Principal Representative	Qube	John Mettam	0412 121 617	<a href="mailto:John.mettam@qube.com.au">John.mettam@qube.com.au</a>
Environmental Manager	Aspect (MPW Stage 2)	Daryl Mckone	0416 791 799	<a href="mailto:daryle@aspectenvironmetal.com.au">daryle@aspectenvironmetal.com.au</a>
Environmental Manager	Tactical (MAAI & MAUW)	Ryan Butler	0411 793 034	<a href="mailto:rbutler@tacticalgroup.com.au">rbutler@tacticalgroup.com.au</a>
Principal Contractor	Fulton Hogan (IMEX)	James Diamond	0409 684 105	<a href="mailto:James.Diamond@fultonhogan.com.au">James.Diamond@fultonhogan.com.au</a>
Principal Contractor	BMD (MAAI & MAUW)	Timothy Davis	0437 359 342	<a href="mailto:Timothy.Davis@bmd.com.au">Timothy.Davis@bmd.com.au</a>
Principal Contractor	Georgiou (LPWPIW & LPWDR)	Will Carter	0419 524 407	<a href="mailto:William.Carter@georgiou.com.au">William.Carter@georgiou.com.au</a>
Principal Contractor	Hansen Yuncken (PIWE)	Josh Beslich	0411752379	<a href="mailto:jbeslich@hansenyuncken.com.au">jbeslich@hansenyuncken.com.au</a>
Principal Contractor	Qanstruct (WH5)	Matthew Gordon	0421000517	<a href="mailto:mgordon@qanstruct.com.au">mgordon@qanstruct.com.au</a>
Project Manager	Archile (PIWE)	Michael Davies	0419 617 879	<a href="mailto:mdavies@archile.com.au">mdavies@archile.com.au</a>
Project Manager	J Wyndham Prince (LPWPIW & LPWDR)	Brett Buckpitt	0408 863 923	<a href="mailto:Bbuckpitt@jwprince.com.au">Bbuckpitt@jwprince.com.au</a>
Technical Advisor	CARAS	Noel Storan	0419 252 680	noel.storan@caras.com.au

## 8 Inspection, Monitoring and Auditing

### 8.1 Inspections

- 8.1.1 The PC must inspect the scheduled activities covered by the EPL in accordance with the CEMP.

### 8.2 Environmental Monitoring

- 8.2.1 The PC must monitor the scheduled activities covered by the EPL in accordance with the CEMP.

### 8.3 Testing

- 8.3.1 The testing of this 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 the plan is capable of being implemented in a workable and effective manner.



- 8.3.2 This PC must test the PIRMP at least once every 12 months or 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.
- 8.3.3 The PC must cover all components of the plan, including the effectiveness of training by means of desktop simulations and practical exercises or drills when testing the plan.
- 8.3.4 The PC must record the dates on which the plan has been tested and the name of the staff members who carried out the testing.

## 8.4 Auditing

- 8.4.1 This section defines the proposed means of auditing the PIRMP for pollutant incidents arising from the activity of crushing, grinding and separating.
- 8.4.2 Upon issue of the PIRMPs to the PC, any requirements not already specified in the PIRMPs will be added.
- 8.4.3 Compliance of the PIRMPs will be audited as follows:
  - ▼ Internal audits –the PC will carry out an audit on a minimum 6-monthly basis.
  - ▼ External audits - will be undertaken by an independent environmental auditor in accordance with ISO 19011:2014 – Guidelines for Quality and/or Environmental Management Systems Auditing, on a 12-monthly basis.

## 9 Review and Improvement of the PIRMP

### 9.1 Plan updates

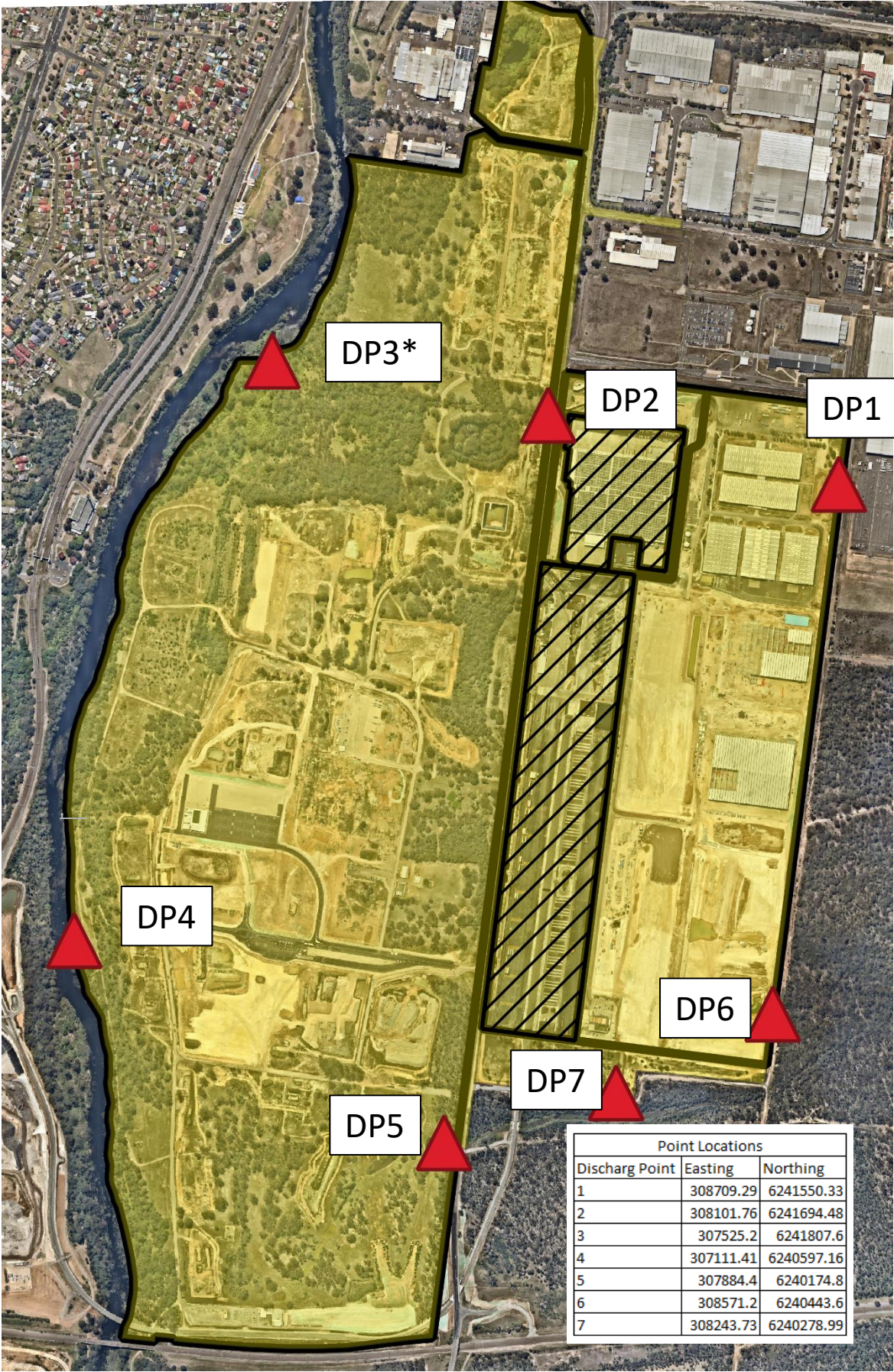
- 9.1.1 Updates of this plan will be produced to ensure continual improvement is achieved.
- 9.1.2 In accordance with the Environmental guidelines: *Preparation of pollution incident response management plans* (2012) this plan will be updated annually. However, updates will be issued after any major pollution incident takes place.
- 9.1.3 Any improvements identified during the review will be included in an updated version of the plan.
- 9.1.4 Plans must include the dates on which they are updated. When this PIRMP is updated, the most recent version of the document will supersede the previous version(s).
- 9.1.5 Obsolete documents will be suitably identified and removed from all points of issue and points of use.



# Appendix A

## Moorebank Logistics Park EPL Premises Map





\*DP3 is approximate corresponding with the most westerly safely accessible location

Key:  Construction Areas  Completed Areas



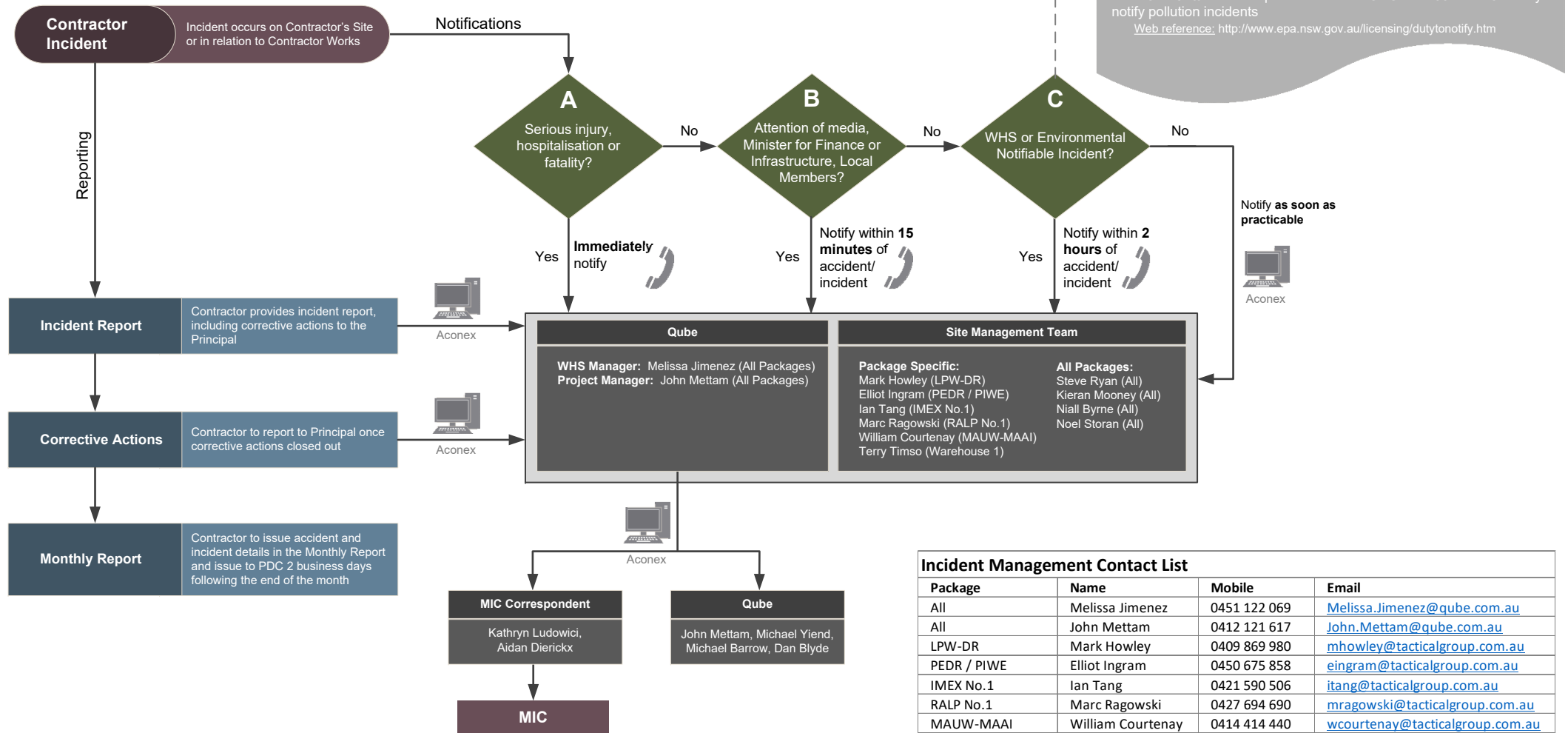
## Appendix B

### Moorebank Intermodal Precinct Incident Management Process



# Moorebank Intermodal Precinct Incident Management Process

October 8, 2018



Incident Management Contact List			
Package	Name	Mobile	Email
All	Melissa Jimenez	0451 122 069	<a href="mailto:Melissa.Jimenez@qube.com.au">Melissa.Jimenez@qube.com.au</a>
All	John Mettam	0412 121 617	<a href="mailto:John.Mettam@qube.com.au">John.Mettam@qube.com.au</a>
LPW-DR	Mark Howley	0409 869 980	<a href="mailto:mhowley@tacticalgroup.com.au">mhowley@tacticalgroup.com.au</a>
PEDR / PIWE	Elliot Ingram	0450 675 858	<a href="mailto:eingram@tacticalgroup.com.au">eingram@tacticalgroup.com.au</a>
IMEX No.1	Ian Tang	0421 590 506	<a href="mailto:itang@tacticalgroup.com.au">itang@tacticalgroup.com.au</a>
RALP No.1	Marc Ragowski	0427 694 690	<a href="mailto:mragsowski@tacticalgroup.com.au">mragsowski@tacticalgroup.com.au</a>
MAUW-MAAI	William Courtenay	0414 414 440	<a href="mailto:wcourtenay@tacticalgroup.com.au">wcourtenay@tacticalgroup.com.au</a>
Warehouse 1	Terry Timso	0414 952 275	<a href="mailto:Terry.Timso@qube.com.au">Terry.Timso@qube.com.au</a>
All	Steve Ryan	0406 995 822	<a href="mailto:sryan@tacticalgroup.com.au">sryan@tacticalgroup.com.au</a>
All	Kieran Mooney	0498 252 347	<a href="mailto:kmooney@tacticalgroup.com.au">kmooney@tacticalgroup.com.au</a>
All	Niall Byrne	0450 739 010	<a href="mailto:niall.byrne@caras.com.au">niall.byrne@caras.com.au</a>
All	Noel Storan	0419 252 680	<a href="mailto:noel.storan@caras.com.au">noel.storan@caras.com.au</a>
All	Michael Yiend	N/A	<a href="mailto:Michael.Yiend@qube.com.au">Michael.Yiend@qube.com.au</a>
All	Michael Barrow	N/A	<a href="mailto:Michael.Barrow@qube.com.au">Michael.Barrow@qube.com.au</a>
All	Kathryn Ludowici	N/A	<a href="mailto:Kathryn.Ludowici@advisian.com">Kathryn.Ludowici@advisian.com</a>
All	Aidan Dierickx	N/A	<a href="mailto:Aidan.Dierickx@advisian.com">Aidan.Dierickx@advisian.com</a>