

# Pollution Incident Response Management Plan – M4-M8 WTP

A Transurban Group plan

---

**Document code**

M4M8-HSE-PL-001

---

**Approval authority**

Asset Operations Manager

Maintenance Operations Manager

---

**Document owner**

General Manager Operations

General Manager Asset Management NSW

---

**Document author**

Operational Environmental Specialist

---

**Confidentiality Statement**

Information in this document must be kept confidential as per its classification below, and the rules of disclosure.

All documents within Transurban Group are classified in the following way: **PUBLIC** documents are intended for anyone, **COMMERCIAL IN CONFIDENCE** documents are to be kept confidential between restricted individuals within Transurban Group and partner organisations. **COMPANY CONFIDENTIAL** documents are to be kept confidential within Transurban Group and used for normal business activities by the general office population, **HIGHLY CONFIDENTIAL** documents are to be kept confidential to restricted individuals within Transurban Group.

**This document is uncontrolled if printed.**

© Copyright Transurban Limited ABN 96 098 143 410. All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording or otherwise, without the written permission of Transurban Limited.

Classification **COMPANY CONFIDENTIAL**

# Revision history

Date	Version*	Author	Nature of change (including review history)
1-Jan-23	1	Kris Hincks	Internal Development
3-Jun-24	2	Kris Hincks, Operational Environmental Specialist <b>Ashley Parnell, Maintenance Operations Manager</b> <b>Tassos Plakogiannis, Asset Operations Manager</b>	Reviewed with no changes.  <b>Reviewed and approved for publishing</b>

**Review Frequency:** Annual

\* An automatic version of this document will be stored upon modifying. Before printing please insert the current version number into the table above and into the footer.



# Contents

<b>1.</b>	<b>Abbreviations, acronyms and definitions</b>	<b>4</b>
<b>2.</b>	<b>Introduction</b>	<b>4</b>
2.1	Background	4
2.2	Objectives	5
2.3	Description	5
2.4	Incident Notification Information	7
2.5	Testing, Review and Amendment	7
<b>3.</b>	<b>Inventory of Pollutants</b>	<b>7</b>
<b>4.</b>	<b>Roles and Responsibilities</b>	<b>8</b>
<b>5.</b>	<b>Hazards to the Environment and Human Health</b>	<b>9</b>
5.1	Controlling Hazards to the Environment	9
5.2	Controlling Hazards to Human Health	10
5.3	Process to be taken following a Pollution Incident	10
5.3.1	Information to be provided	11
5.4	Regulatory Authorities	12
5.5	Community Stakeholders	12
5.6	Staff Training	12
	<b>Appendix A: Testing Register</b>	<b>13</b>
	<b>Appendix B: Compliance Register</b>	<b>14</b>
	<b>Appendix C: Broader Location Map</b>	<b>15</b>

# Pollution Incident Response Management Plan – M4-M5 WTP

## 1. Abbreviations, acronyms and definitions

Term or acronym	Description
ACT	Protection of the Environment Operations Act 1997
EPA	Environment Protection Authority (EPA)
DPIE	Department of Planning Industry and Environment
FHEOM	Fulton Hogan Egis Operations & Maintenance - Maintenance Service Provider
HSE	Health, Safety and Environment
HSEMS	Health Safety and Environment Management System
MCoA	Minister's Conditions of Approval
M8	The M8 Motorway between the existing M5 East corridor at Beverly Hills via tunnel to St Peters.
O&M	Operations and Maintenance
OEMP	Operational Environmental Management Plan
OMCS	Operations Motorway Control System
PMCS	Plant Management Control Systems
SWMS	Safe Work Method Statement
TMCS	Traffic Management Control System
TUWCX	Transurban WestConnex

## 2. Introduction

### 2.1 Background

WestConnex Transurban Pty Ltd (WCX TU) holds an Environment Protection Licence (Licence # 21616) with the NSW Environment Protection Authority (EPA) for the Water Treatment Plant (WTP) located at the Campbell Rd Motorway Operations Centre. As per the Protection of the Environment Operations Act 1997 (the POEO Act), WCX TU PT as holder has prepared the following Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the Protection of the Environment Operations Act 1997 and in-line with Protection of the Environment Operations (General) Regulation 2009 95A (1) that restricts this plan to only cover pollution events from contaminated groundwater treatment.

# Pollution Incident Response Management Plan – M4-M5 WTP

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, WCX TU will immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act. A written copy of this plan is kept at the St Peters Motorway Control Centre (33 Burrow Road, St Peters, NSW, 2044), and is made available on request by an authorised NSW EPA Officer and publicly at (<https://www.linkt.com.au>)

## 2.2 Objectives

The objectives of this PIRMP are to:

- Minimise and control the risk of a pollution incident at the project by requiring identification of risks and the development of planned actions to minimise those risks;
- Ensure comprehensive and timely communication about an incident to the Environment Protection Authority (EPA) and other relevant government authorities and the community who may be affected by the impacts of an emission pollution incident.

## 2.3 Description

During operation of the Asset, there will be an ongoing inflow of groundwater into the tunnels. The tunnel drainage system has been designed to accommodate the capture, removal, treatment, storage and discharge of groundwater. Groundwater inflows would flow to the low point sump. During normal operation, the water treatment plant will treat and discharge approximately 2.4ML of groundwater per day. The water treatment plant will be designed for a nominal treatment flowrate of 17 l/s and a peak flowrate of 24 l/s. The actual treatment flow rate through the WTP is 27 l/s, however 3 l/s has been included to allow for filtrate and backwashing, resulting in a total water input and output of 24 l/s. The proposed WTP process is designed based on the results of the hydrogeological model, presented in section 2.2.5.3, which predict the groundwater path and contamination level once the tunnels will be constructed. The treatment plant will be an automated process which consists of;

- Inlet Water Quality Monitoring
- Screening
- Flow Buffering via Balance Tank
- Aeration
- pH Correction
- Coagulation
- Flocculation
- Dissolved Air Flotation
- Greensand Media Filtration
- Break Point Chlorination
- Activated Carbon Filtration
- Ion Exchange filtration
- Sludge Dewatering via Screw Press
- Discharge Water Quality Monitoring
- This process will remove the suspended solids, heavy metals and ammonia and correct the pH prior to discharge into the swale drain adjacent to Campbell Road.

# Pollution Incident Response Management Plan – M4-M5 WTP

The WTP process flow diagram is shown in below Figure 1.

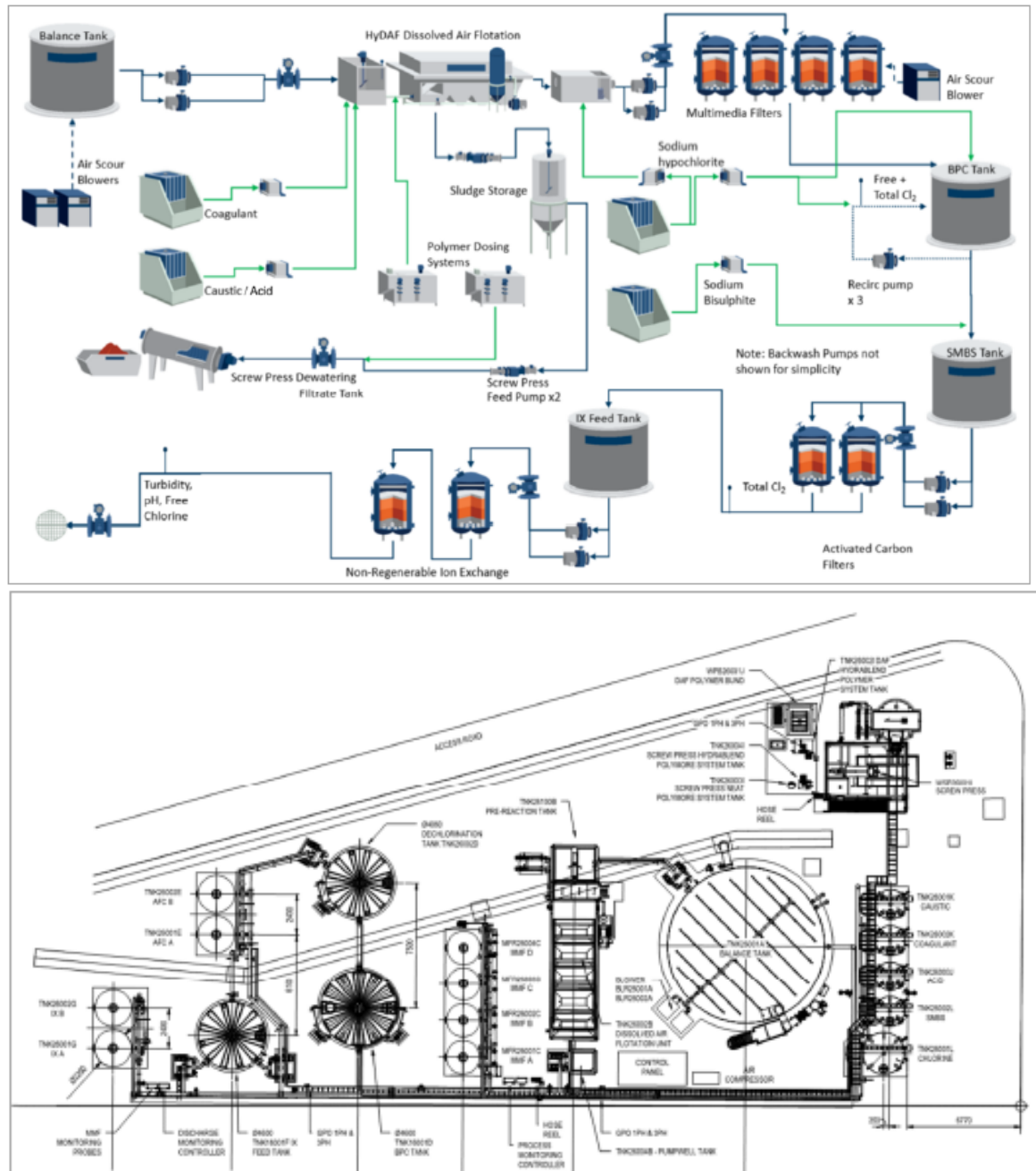


Figure 1: Water Treatment Plant, Campbell Rd

# Pollution Incident Response Management Plan – M4-M5 WTP

## 2.4 Incident Notification Information

The relevant information about a pollution incident required under S150 of the Protection of the Environment Operations Act 1997 consists of the following:

- (1)
  - a) time, date, nature, duration and location of the incident,
  - b) location of the place where pollution is occurring or is likely to occur,
  - c) nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
  - d) circumstances in which the incident occurred (including the cause of the incident, if known,
  - e) action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
  - f) other information prescribed by the regulations.
- (2) The information required by this section is the information known to the person notifying the incident when the notification is required to be given.
- (3) If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.

## 2.5 Testing, Review and Amendment

The PIRMP will be tested in accordance with the requirements set out in the Protection of the Environment Operations (General) 2009 as follows:

- 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; and
- Any such test is to be carried out:
  - At least once every 12 months; and
  - Within 1 month of any pollution incident occurring

The link as a whole has a number of potential scenarios that may impact the environment; detailed in the *Operational Environmental Management Plan; Appendix D Environmental Risk Register*. PIRMP testing will be limited to WTP discharge exceedance scenarios.

In the PIRMP, the following details will be recorded on a continuous basis:

- *Review*: Date, version, author and nature of change (Page 2) and
- *Test*: Date (tested), description of test, conducted by, date (update) (Appendix A).

## 3. Inventory of Pollutants

Quantities of potential pollutants will be kept on the premises for use during operation and maintenance. The main chemicals stored at the WTP are as follows.

- Sodium hydroxide (also called caustic) or acid to correct the pH of the raw water; 3000L

# Pollution Incident Response Management Plan – M4-M5 WTP

- Coagulant and polymer to aid the solids settling process within the DAF; 3000L
- Sodium hypochlorite to convert ammonia into dichloramine; 10 000L
- Sodium metabisulphite (SMBS) to neutralise the free chlorine; 3000L
- Polymer added after the sludge settling tank to assist sludge dewatering; 600l

All potential pollutants related to this PIRMP are stored within the Hazardous Materials Storage area of the WTP in a bunded and secured area. Safety Data Sheets (SDS) are available on site for all chemicals to aid in clean-up of any spills.

## 4. Roles and Responsibilities

As required by the act; the roles and responsibilities are described below of those key individuals who are responsible for activating the plan, managing the response and notifying relevant authorities:

Role	Responsibility	Contact Details (24hr)
<b>Incident Control Room – TCRO - WCX TU</b>	<ul style="list-style-type: none"> <li>Responsible for managing the response to a pollution incident.</li> <li>Responsible for activating the PIRMP.</li> <li>Authorised to notify relevant authorities under section 148 of the POEO Act.</li> </ul>	(02) 8746 0045
<b>O&amp;M Manager - WCX TU</b>	<ul style="list-style-type: none"> <li>Responsible for coordinating the Incident response and maintenance of WestConnex M8 Motorway with FHEOM</li> <li>Ensuring FHEOM meet the below obligations and assisting anyway possible</li> <li>Assisting the TCRO in contacting the relevant agencies</li> </ul>	
<b>FHEOM</b>	<ul style="list-style-type: none"> <li>Responsible for the Incident response and maintenance of WestConnex M8 Motorway</li> <li>Responsible for incident notification, incident management and liaison as required with WCX TU.</li> </ul>	
<b>I&amp;M Manager - FHEOM</b>	<ul style="list-style-type: none"> <li>Ensures plans and systems are in place to cover envisaged emergency and incident situations that may occur on the WestConnex Motorway Maintenance Site</li> <li>Ensure systems are in place for the identification, classification, management and recovery from all incidents that may occur on the WestConnex Motorway or as a result of the actions of the I&amp;M Activities</li> </ul>	



# Pollution Incident Response Management Plan – M4-M5 WTP

Role	Responsibility	Contact Details (24hr)
<b>QSE Manager - FHEOM</b>	<ul style="list-style-type: none"> <li>Management of response and control of pollution incidents • Assessing how any clean up actions will be undertaken following an environmental incident</li> <li>Advise SMC in event of any actual or potential pollution incident and provide regular updates where required</li> <li>Immediately upon the cessation of the emergency situation, assist all affected parties to commence recovery from that emergency situation and commence any investigative processes required</li> </ul>	
<b>Maintenance Manager - FHEOM</b>	<ul style="list-style-type: none"> <li>Takes direct control of any environmental pollution incident within the work of that area until relieved from that position by the QSE Manager or an officer from the Responding Agency • Gives all authority and provide such resources to ensure swift containment and control from any environmental incident situation</li> <li>Immediately notifies the Environment and Community Manager of any environmental incidents</li> </ul>	
<b>Maintenance Superintendent and Supervisors - FHEOM</b>	<ul style="list-style-type: none"> <li>Take all necessary steps and assume all necessary responsibility required to contain and control any environmental situation until the QSE Manager is available.</li> </ul>	

## 5. Hazards to the Environment and Human Health

Due to the licence relating to the scheduled activity 'Road Tunnel Emissions' the following hazards related to the environment and human health are exclusively:

- Release of contaminated substances into surface waters
- Release of contaminated substances onto land
- Waste generated from the WTP disposed at an unlicensed facility
- Ground disturbance resulting in dirty water runoff into surface waters.

As required under the Act; the likelihood of the abovementioned environmental hazards are detailed in the *Operational Environmental Management Plan*. The Plan is publicly available on the WestConnex Website.

### 5.1 Controlling Hazards to the Environment

In order to mitigate the abovementioned hazards, WCX TU implements constant water monitoring throughout the WTP and at the outlet point in accordance with the conditions of the EPL and the approved WQMP. Further physical controls are detailed in 5.3 *Environmental Pollution Control Equipment*. Site

# Pollution Incident Response Management Plan – M4-M5 WTP

personnel are also trained in, and implement the following related management plans to control factors that may influence an exceedance of the WTP limits:

Description
<i>Operational Environmental Management Plan</i>
<i>Water Quality Monitoring Program</i>

Specifically, in the OEMP Annexure D: Environmental Risk Register describes the environmental impact and the mitigation, management and monitoring strategies that are being employed to manage hazards.

## 5.2 Controlling Hazards to Human Health

To minimise the risk of harm to people at the premises the following measures will be implemented:

- Restricted access to the Maintenance Site (authorised personnel access only)
- All personnel are inducted into the risks and hazards (including the WHSMP and SWMS) of the worksite as required
- All person(s) accessing site are required to wear the appropriate PPE including:
  - Long pants
  - Long sleeved shirt
  - Hard hat
  - High visibility vest
  - Steel capped boots
  - Safety glasses.
- All person(s) to be made aware of the PIRMP including notification/response procedures during site induction
- All personnel are made aware of all site exits and emergency evacuation points. Emergency assembly points are advised by supervisors on the day prior to works at each location and when entering the work site due to the changing nature of the works Environmental Pollution Control Equipment

As per WQMP and the OEMP, the WTP is managed by the use of a computerised control system. The WTP is monitored continuously at the Control room with alarms sounding if any pump failure is detected or if any water quality parameter is out of its specified set point.

Technicians and Maintenance Supervisors are on site continuously to respond to any faults or direction from the TCRO's

## 5.3 Process to be taken following a Pollution Incident

In the event of an environmental pollution incident occurring on site the following procedure will be followed by the TCRO's:

- Call the O&M Manager if the incident presents an immediate threat to human health or property and then proceed to call 000, NSW Fire and Rescue, NSW Police and NSW Ambulance Service are the first responders responsible for controlling and containing incidents;

# Pollution Incident Response Management Plan

## – M4-M5 WTP

- If the incident does not require an initial emergency services agency, or once the 000 call has been made, the TCRO or delegate is responsible for notifying the relevant authorities in the following order: - The NSW EPA – Regulatory Authority under the POEO Act
  - The Ministry of Health via the local Public Health Unit
  - WorkCover
  - The local councils
  - NSW Fire and Rescue NSW
- The O&M Manager will also be responsible for notifying the Community and Stakeholder Manager who will inform the community, in such instances where the community is affected. Notify the DPI&E, EPA and DoH immediately in the event of an exceedance of EPL conditions or when there is a potential for material harm to occur or is occurring.

### 5.3.1 Information to be provided

The following information about a pollution incident must be presented to the relevant authorities upon notification:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or likely to occur
- The circumstances in which the incident occurred, including the cause of the incident, if known
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Any other information prescribed by the Regulations.

# Pollution Incident Response Management Plan – M4-M5 WTP

## 5.4 Regulatory Authorities

As above, the TCRO or equivalent is responsible for notifying relevant authorities. The current contact details of the relevant authorities under section 148 of the POEO Act include;

Authority	Email	Phone
<b>EPA (NSW)</b>	info@epa.nsw.gov.au	131 555
<b>Health (NSW)</b>	MOH-EHB@health.nsw.gov.au	(02) 9424 5817
<b>DPIE</b>	infrastructure.notifications@planning.nsw.gov.au compliance@planning.nsw.gov.au	
<b>WorkCover NSW</b>	contact@safework.nsw.gov.au	131 050
<b>Fire and Rescue</b>	contact@frnsw.nsw.gov.au	1800 679 737

## 5.5 Community Stakeholders

The requirements surrounding community consultation and involvement are detailed within *the OEMP* which was required as part of the conditions of approval.

In order to ensure consultation with each community stakeholder is effective, different stakeholders will be notified depending on the severity of the incident and in terms of whether they would be directly affected by the incident.

## 5.6 Staff Training

All TCROs receive training during the induction process to ensure they can effectively implement the PIRMP. Ongoing training ensures they are able to prevent and respond to exceedances should they occur. Training includes, but is not limited to:

- Employee responsibilities and legal obligations in relation to ventilation outlet exceedances and reporting requirements.
- Identification of site issues that may lead to a WTP exceedance.
- Appropriate immediate action to control and contain an incident including provision of contact details of relevant personnel for notification.
- Staff must be provided with information to reflect the following hierarchy in their response to an environmental incident.

# Pollution Incident Response Management Plan – M4-M5 WTP

## Appendix A: Testing Register

Date (Tested)	Description of Test	Conducted By	Date (Updated)

# Pollution Incident Response Management Plan – M4-M5 WTP

## Appendix B: Compliance Register

Below describes how the above PIRMP complies with the requirements under Section 3 General requirements for preparing pollution incident response management plans the EPA Guideline (2012):  
Preparation of pollution incident response plans:

Requirement	Section of PIRMP
<b>3.3.1 Description and likelihood of hazards [clause 98C (1)(a) and (b)]</b>	5.0 Hazards to the Environment and Human Health
<b>3.3.2 Pre-emptive actions to be taken [clause 98C(1)(c)]</b>	5.1 Controlling Hazards to the Environment 5.2 Controlling Hazards to Human Health
<b>3.3.3 Inventory of pollutants [clause 98C(1)(d) and (e)]</b>	3.0 Inventory of Pollutants
<b>3.3.4 Safety equipment [clause 98C(1)(f)]</b>	5.3 Environmental Pollution Control Equipment
<b>3.3.5 Contact details [clause 98C(1)(g) and (h)]</b>	4.0 Roles and Responsibilities 6.2 Regulatory Authorities
<b>3.3.6 Communicating with neighbours and the local community [clause 98C(1)(i)]</b>	7.0 Community Stakeholders
<b>3.3.7 Minimising harm to persons on the premises [clause 98C(1)(j)]</b>	5.2 Controlling Hazards to Human Health
<b>3.3.8 Maps [clause 98C(1)(k)]</b>	2.3 Description Appendix D: Broader Location Map
<b>3.3.9 Actions to be taken during or immediately after a pollution incident [clause 98C(1)(l)]</b>	5.4 Process to be taken following a Pollution Incident
<b>3.3.10 Staff training [clause 98C(1)(m)]</b>	7.4 Staff Training

# Pollution Incident Response Management Plan – M4-M5 WTP

## Appendix C: Broader Location Map

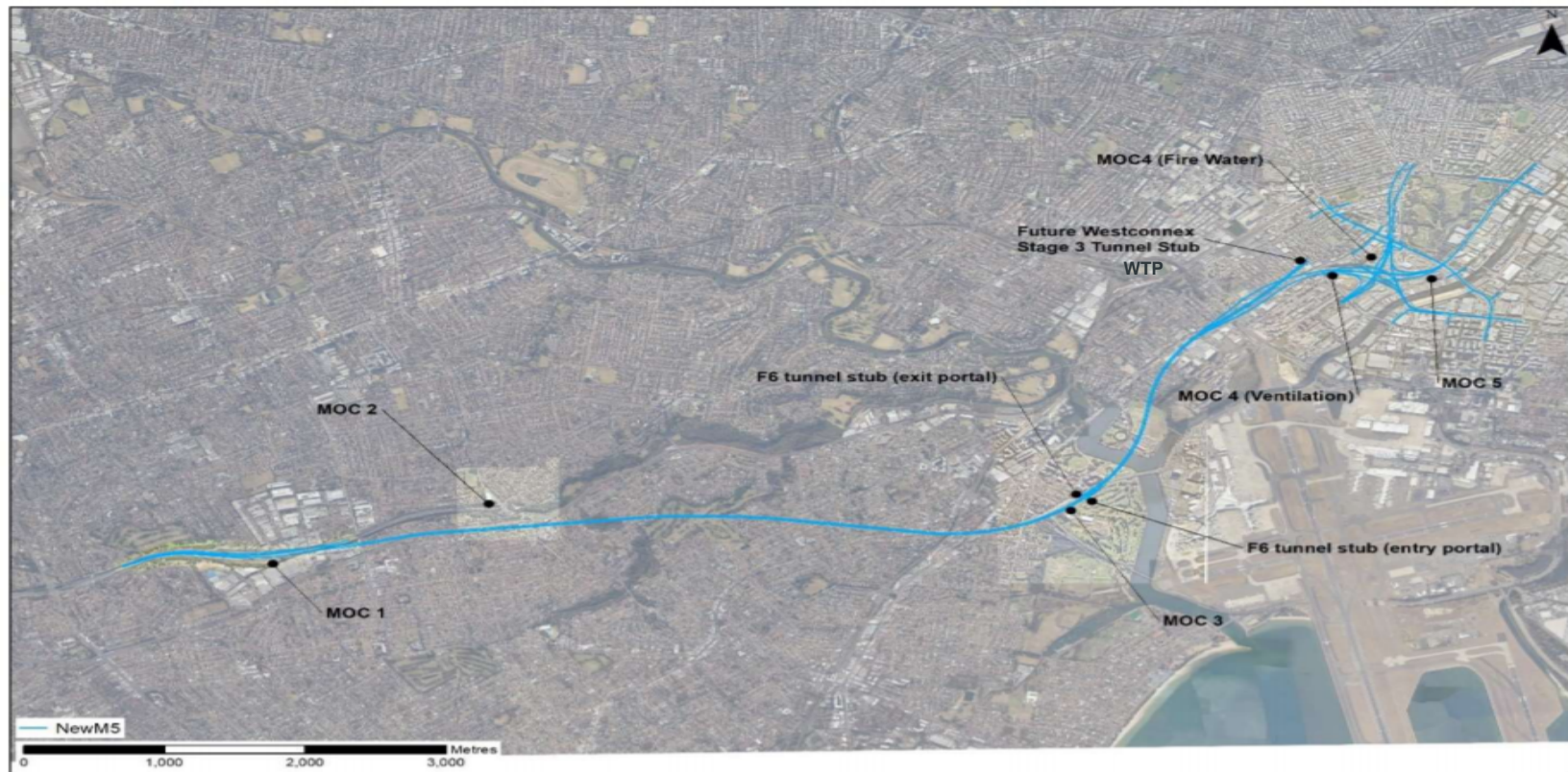


Figure 2 Broader Location Map