

Appendix J Pollution Incident Response Management Plan

Taralga Wind Farm

5 June 2019

Table of Contents

1.	Introduction.....	3
1.1	Purpose of this Document	3
1.2	Legislative Requirements of the PRIMP.....	3
1.3	PIRMP Structure.....	4
2.	Site Description	5
2.1	Wind Farm Ownership.....	5
2.2	Wind Farm Assets	5
2.3	Wind Farm Activities.....	7
2.4	Service Compound	7
2.5	Access Tracks	8
2.6	Underground Cable Routes.....	8
2.7	Substation.....	8
3.	Chemicals and Materials	15
3.1	Inventory	15
4.	Pollution Incident	17
4.1	Environmental Aspects.....	17
4.2	Pollution Incidence Impacts, Risk and Mitigation	18
4.3	Proponent, Contractors and other Stakeholders	27
5.	Environmental Management System	28
5.1	Pacific Hydro Certification to ISO 14001	28
5.2	OEMP	28
5.3	HSEQ Risk Management Procedure.....	28
6.	Pollution Incident Response.....	29
6.1	Contact Lists	29
6.2	Responsibilities.....	30
6.3	Communication with the Local Community	30
6.4	Immediate Action to Take In Case of a Pollution Incident.....	30
6.5	Training and Education.....	34
6.6	Audit and Review of the PIRMP	34

Figures

Figure 2-1	Site Location	6
Figure 2-2	Site Map.....	9
Figure 2-3	Landholders	10
Figure 2-4	Service Compound Layout	11
Figure 2-5	Substation General Arrangement	12
Figure 2-6	Substation Set Out.....	13
Figure 2-7	Mapped Ecological Communities	14

1. Introduction

1.1 Purpose of this Document

This Pollution Incident Response Management Plan (PIRMP) has been prepared by Pacific Hydro for the Taralga Wind Farm (TWF) to address the requirements of Part 5.7A of the Protection of the Environment Operations (POEO) Act and POEO Regulations 2009 (General). The Plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO (G) Regulation (Clause 98B) and with additional matters described in Clause 98C of the Regulation.

Key management aspects described in this PIRMP are also addressed by the Department of Planning and Environment (DPE) approved TWF Operational Environmental Management Plan (OEMP), and the TWF Emergency Response Plan.

1.2 Legislative Requirements of the PRIMP

The holders of an Environment Protection Licence (EPL) are required to prepare, keep, test and implement a PIRMP. TWF holds EPL 20429 that relates to the scheduled activity of electricity generation throughout the Operations phase of the wind farm.

Section 153C of the POEO Act, specifies information to be included in the PIRMP as follows:

- the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:
 - the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
 - the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
 - any persons or authorities required to be notified by Part 5.7,
- a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,
- 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 and, in particular, the persons through whom all communications are to be made,
- Any other matter required by the regulations.

Section 98C of the POEO Regulation also prescribes additional matters to be addressed by the PIRMP including:

- 98C (1)(d) and (e) The maximum quantity of potential and an inventory of pollutants likely to be stored or held at the premises,
- 98C (1)(g) Names, positions and 24-hour contact details of key individuals who are responsible for activating the PIRMP, notifying the relevant authorities, and individuals who have responsibilities for managing the response to a pollution incident,
- 98C (1)(h) Contact details of the appropriate regulatory authority including the Environment Protection Authority (EPA) or the local council (Upper Lachlan Shire Council), the Ministry of Health, WorkCover NSW, and Fire and Rescue NSW,
- 98C (1)(i) A mechanism for providing early warnings and updates to premises in the vicinity,

- 98D Certain information from the PIRMP must be on a publicly accessible website. The information that licensees are required to place on a publicly accessible website includes the procedures that the licensee will follow when notifying the owners and occupiers of premises who may be affected by an incident occurring on the premises, the names of relevant authorities and their contact details.

1.3 PIRMP Structure

The PIRMP discusses the following aspects designed to satisfy the requirements listed above:

- TWF description of facilities and activities;
- Description of potential for pollution incidences;
- Pacific Hydro environmental management system and risk management; and
- Pollution incidence response.

2. Site Description

2.1 Wind Farm Ownership

Taralga Wind Farm (TWF) is owned by Pacific Hydro Pty Ltd under the following subsidiaries:

- Energy Pacific (Vic) Pty Ltd;
- Taralga Wind Farm Nominees No 1 Pty Ltd;
- Taralga Wind Farm Nominees No 2 Pty Ltd; and
- Taralga Wind Farm Pty Ltd.

2.2 Wind Farm Assets

Taralga Wind Farm is located near the town of Taralga (Figure 2-1 Site Location), in the southern tablelands of New South Wales (NSW). TWF generates up to 106.8 MW of electricity and consists of the following components:

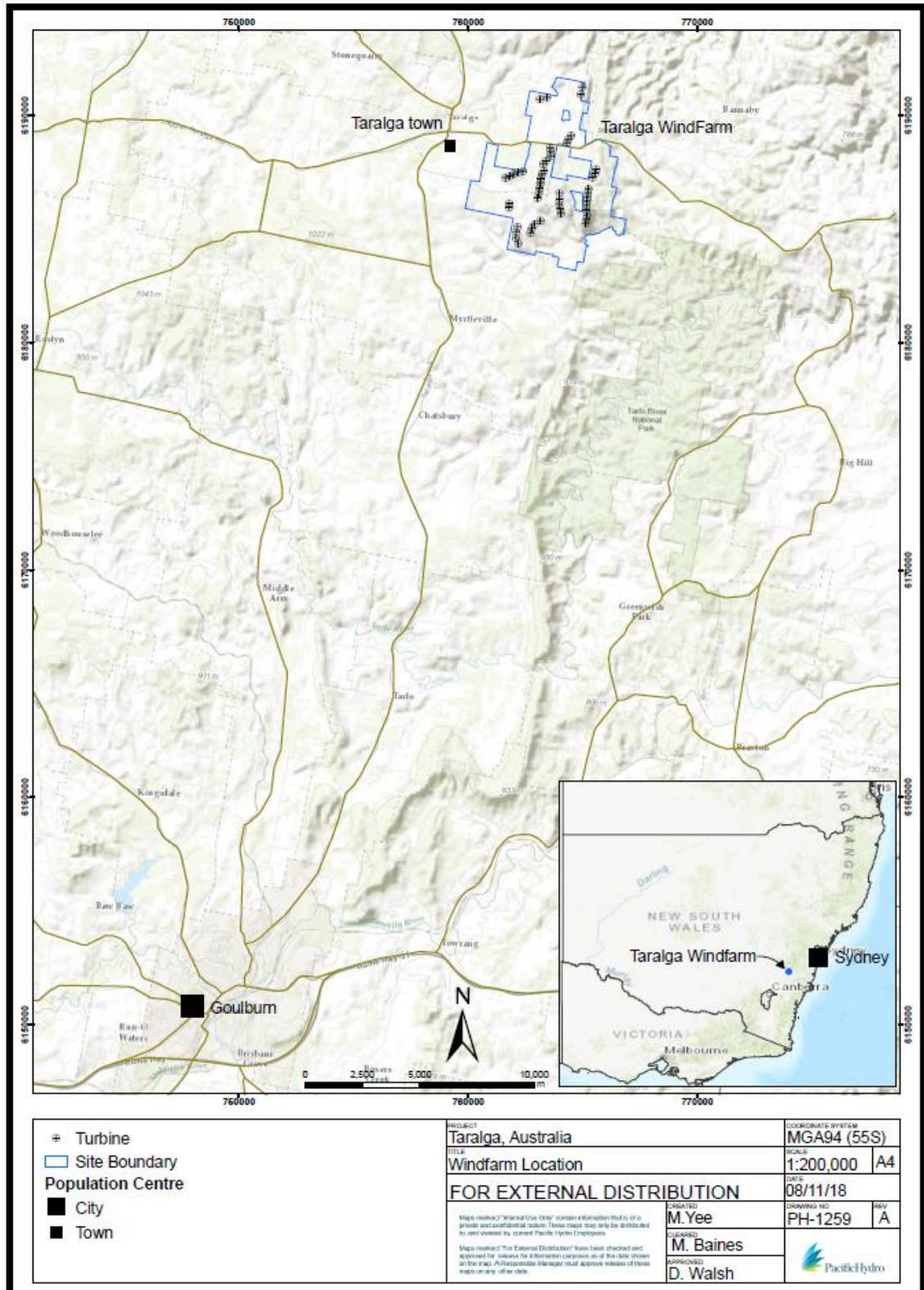
- 51 Wind Turbine Generators (WTGs) with hub heights of 80 metres above ground level and consisting of three types of WTG:
 - 21 V100 1.8 MW WTGs (100 metre rotor diameter);
 - 21 V90 2.0 MW WTGs (90 metre rotor diameter); and
 - 9 V90 3.0 MW WTGs (90 metre rotor diameter).
- A Substation to transform the electricity produced by the Wind Farm from 33 kV to 132 kV;
- A Service Compound located adjacent to the Substation and consisting of the Site Office and workshop;
- Site access roads;
- WTG hardstands for WTG assembly and maintenance;
- Underground electrical and fibre optic cabling;
- 33 kV overhead power line and optical ground wire;
- Eight wind monitoring masts, each 80 m in height; and
- One digital television re-transmitter.

A map of the Wind Farm is shown in Figure 2-2 Site Map. The Wind Farm is divided into 5 collector groups (electrical circuits).

This PIRMP is applicable to pollution incidences that have originated either within the area licenced by the TWF or were caused as a result of the operation of the Taralga Wind Farm. The area licenced by the TWF generally includes the turbine hardstands, access tracks, cable trenches, sub-station area and Services Compound. The licenced area is defined as the wind farm access tracks, hardstands and compound boundaries as shown in Appendix A of the OEMP.

TWF is connected to the electricity network near Marulan, approximately 30 km to the south east; via a dedicated 132 kV single circuit transmission line. This transmission line is owned and operated by Essential Energy (EE) and is, therefore, not addressed by this PIRMP.

Figure 2-1 Site Location



2.3 Wind Farm Activities

During wind farm operations and maintenance, on-site staff of approximately 6 persons forms the service team. Additional personnel may be required for maintenance activities. Activities associated with the wind operations and maintenance can include scheduled and unscheduled repairs. Activities are expected to include:

- Movements of service team to and from site and within the site on designated access tracks, hardstands and service compounds;
- Transport of any replacement parts to site which could include large components such as turbine blades and gearbox;
- Use of large crane and Franna crane to hoist equipment into position and secure components;
- Use of elevated work platforms or abseiling for minor repairs, maintenance or inspections of turbine components;
- Maintenance of substation, service compound, overhead lines and cable routes; and
- Rehabilitation and maintenance to access tracks, drainage or erosion and sediment controls.

2.4 Service Compound

The Service Compound, constructed in 2015, is located adjacent to the substation and consists of a Colorbond Site Office and Workshop building as per Figure 2-4 Service Compound Layout. The Service Compound is accessed from the main entrance at Bannaby Road.

The Service Compound consists of the following:

- Building and office facilities;
- Amenities - connected to a sewage management facility which has been approved by Upper Lachlan Shire Council 28 January 2014. The system is a 3000L septic tank with 75m² absorption bed. Treated effluent is discharged to a designated fenced-off irrigation area adjacent to the Services Compound;
- Workshop area; and
- Car parking.

The car parking / outside area of the compound contains the following:

- Two above ground 15000L water storage tanks – supplied by rainwater from roof catchment;
- Liquid waste storage container area;
- Segregated hard waste (metal, cardboard);
- Oil recycling double bunded container;
- Prescribed waste storage;
- General waste storage area;
- Back-up generator – utilised to supply power to the substation protection systems and the Service compound in the event of a power outage;
- Up to 14 car park spaces; and
- An entry and exit gate.

Only the minimum quantities required of hazardous substances are stored within the Service Compound. Hazardous substances and materials are stored in either the hazardous storage container, an approved bunded cabinet inside the Workshop or inside the bunded shipping container. Other hazardous substances and materials are contained within vehicles themselves, inside the wind turbine nacelles and the substation. An inventory of hazardous materials is listed in Table 3-1 Chemicals and, Materials Location below.

2.5 Access Tracks

TWF has approximately 27 km of access tracks and 51 hardstand areas with associated drainage infrastructure providing access throughout the wind farm across many different landholders. Access tracks and land owned by various landholders are shown in Figure 2-2 and Figure 2-3.

Control of dust generation is required for disturbed areas in dry conditions or where there are frequent vehicle movements. A speed limit of 40 km/h is employed and water trucks or sprays can be used for control of dust if required for high activity periods of work.

Quarterly inspections involve a check on the condition of access tracks and drainage infrastructure. Revegetated and rehabilitated areas also require monitoring and maintenance as detailed in the OEMP.

2.6 Underground Cable Routes

Cable and fibre optic routes provide connections between the substation and the wind turbines and the overhead line. The cable routes have been installed and rehabilitated. Underground cables are shown in Figure 2-2 Site Map below.

2.7 Substation

The 33kV/132kV substation is located opposite the Service Compound accessed via the Main Entrance at Bannaby Road (refer to Figure 2-5 Substation General Arrangement). The grid connections components have been designed constructed and are operated by Vestas on behalf of Pacific Hydro. The substation was energised in June 2016.

The grid connection facilities include a 33kV/132kV transformer, 33kV and 132kV switchgear and a control room. The Substation and Switchyard are not 'Scheduled Premises', and are not part of the facilities subject to EPL 20665 and, do not need to be addressed by this PIRMP, but have been included here for completeness to ensure consistent consideration of risks posed by site facilities.

The substation/switchyard layout (refer to Figure 2-6 Substation Set Out) contains three voltage transformers, one auxiliary transformer and one main transformer.

The main transformer has an oil capacity of 31,040 litres and the auxiliary transformer has an oil capacity of 825 litres. Both of these transformers have containment.

Each of the three voltage transformers have an oil capacity of 88 litres but are situated outside of the containment area. However whilst the voltage transformers have been constructed to the Australian Standard the oil containers are sealed until the units are taken offsite for decommissioning.

The containment for the main and auxiliary transformers drains into to a puraceptor tank consisting of an oil water separator system. Treated water from the oil separator flows to the retention / sediment basin. The puraceptor tank is located in the substation switchyard.

Figure 2-2 Site Map

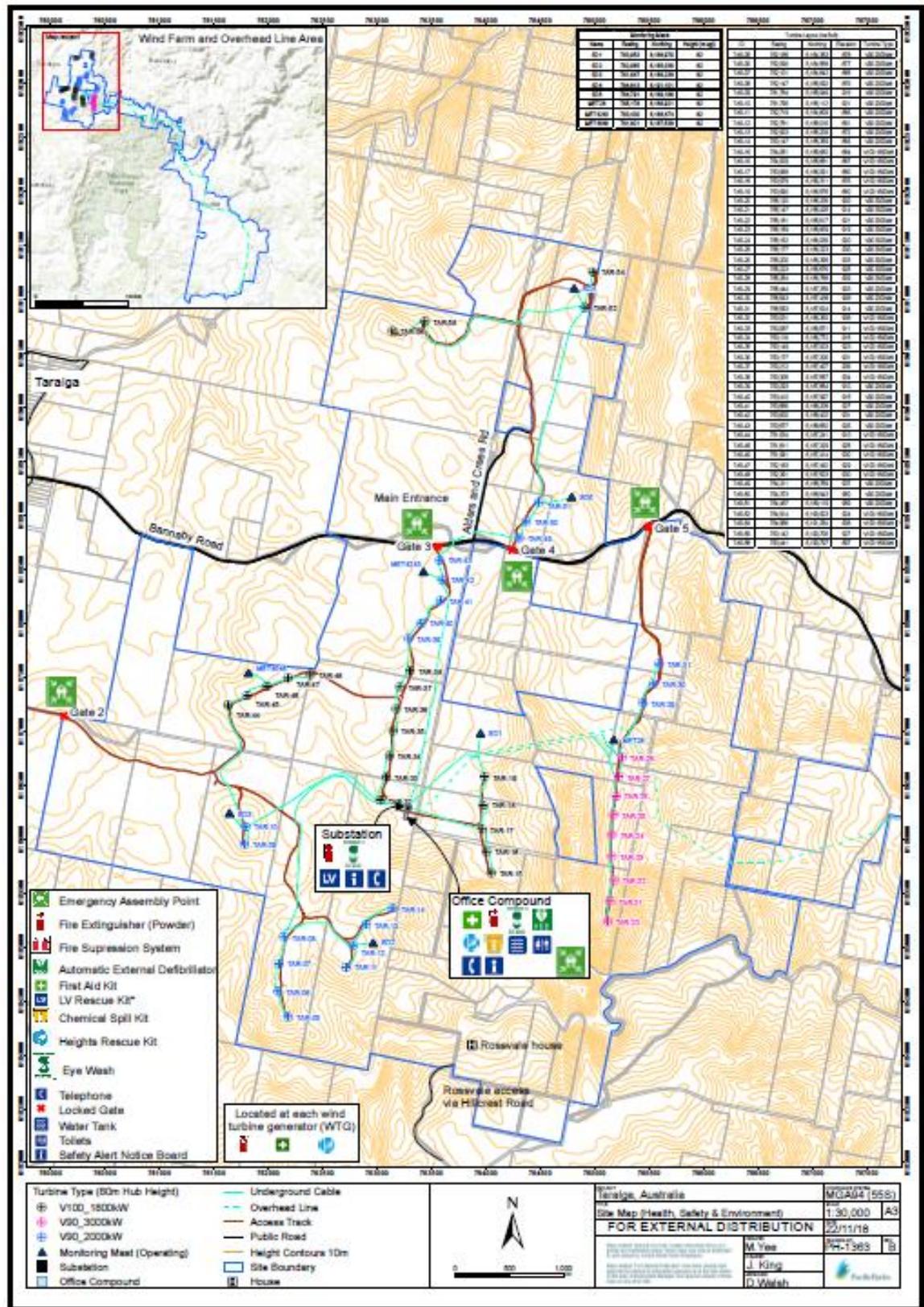


Figure 2-3 Landholders

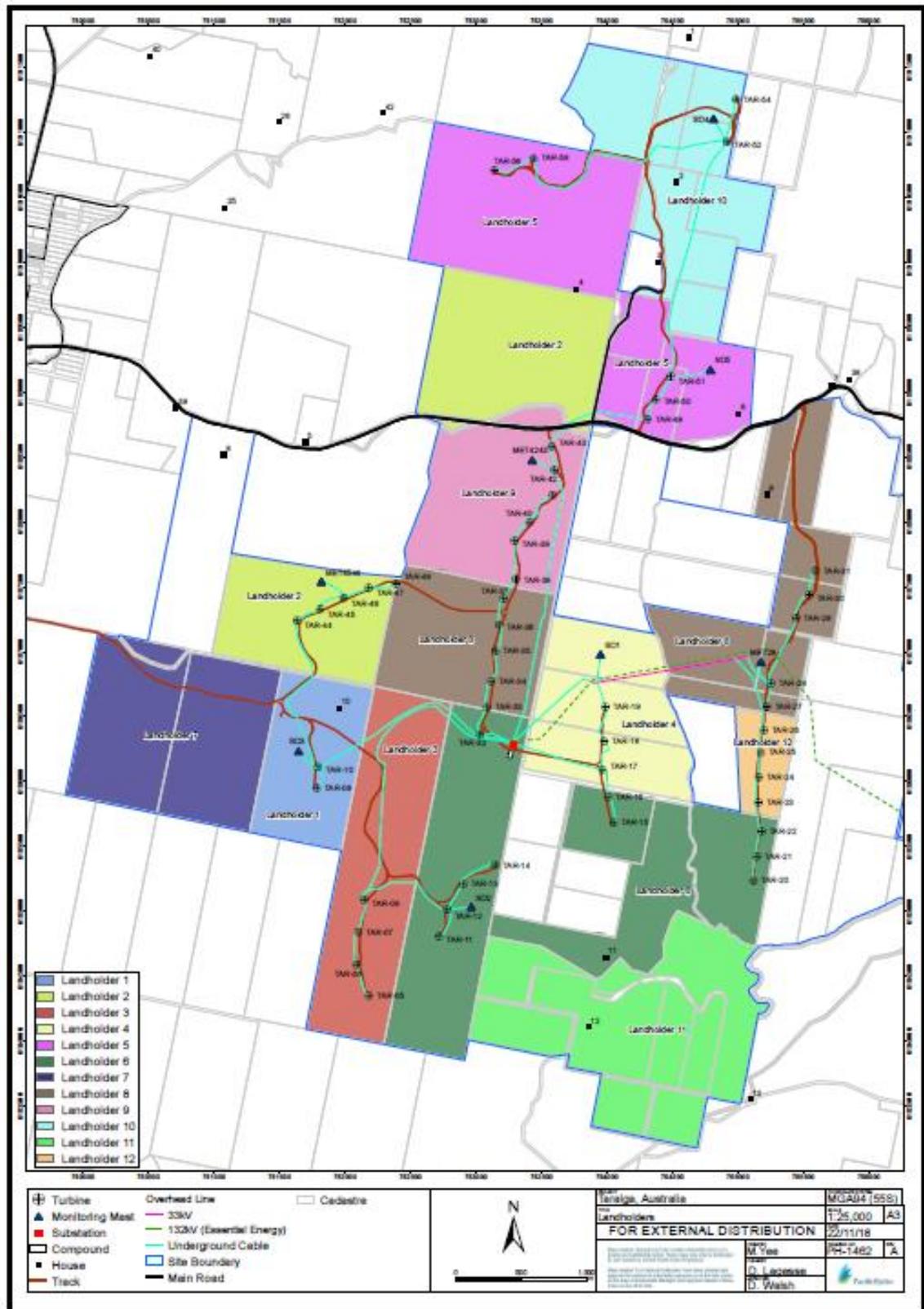


Figure 2-4 Service Compound Layout

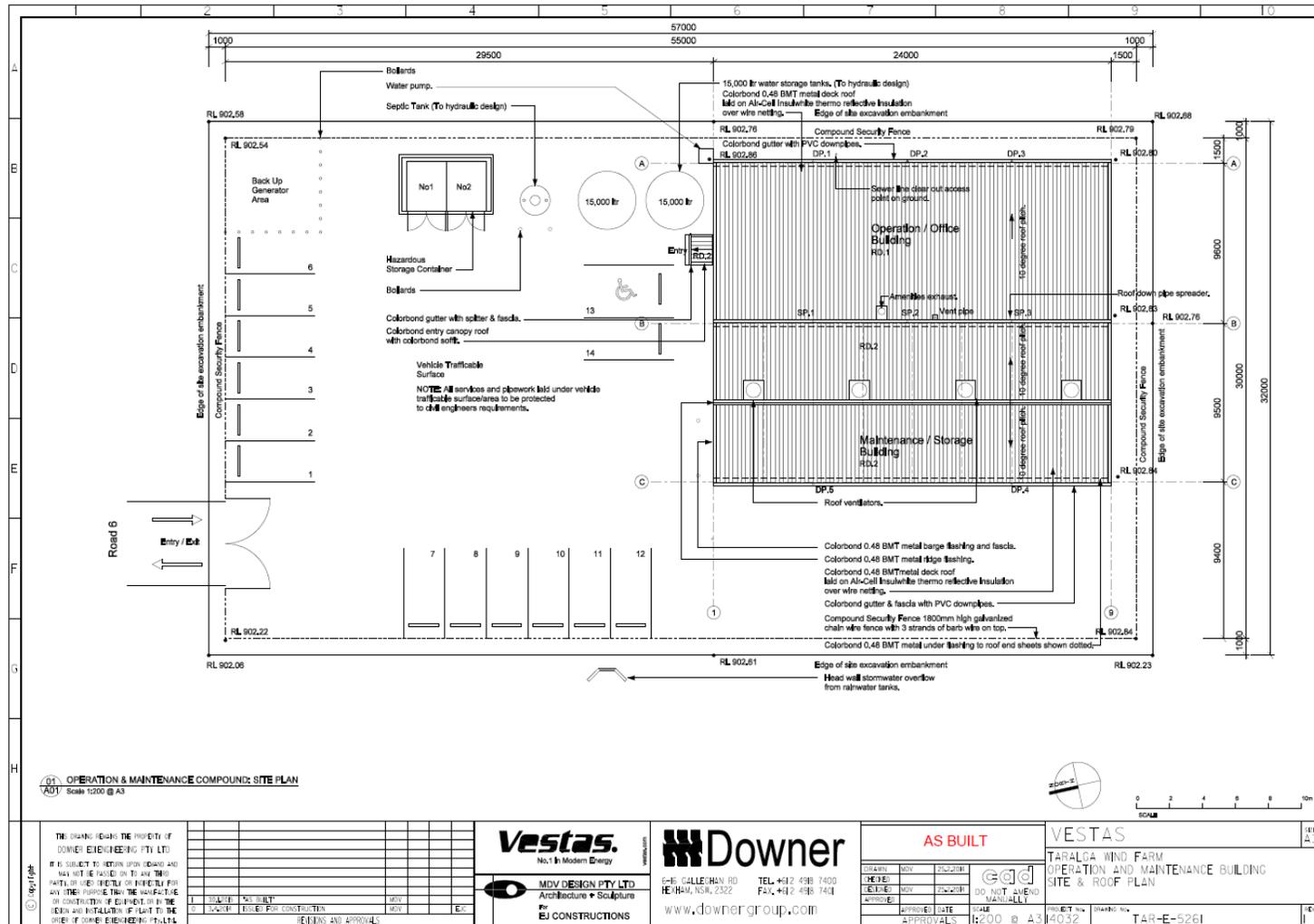


Figure 2-5 Substation General Arrangement

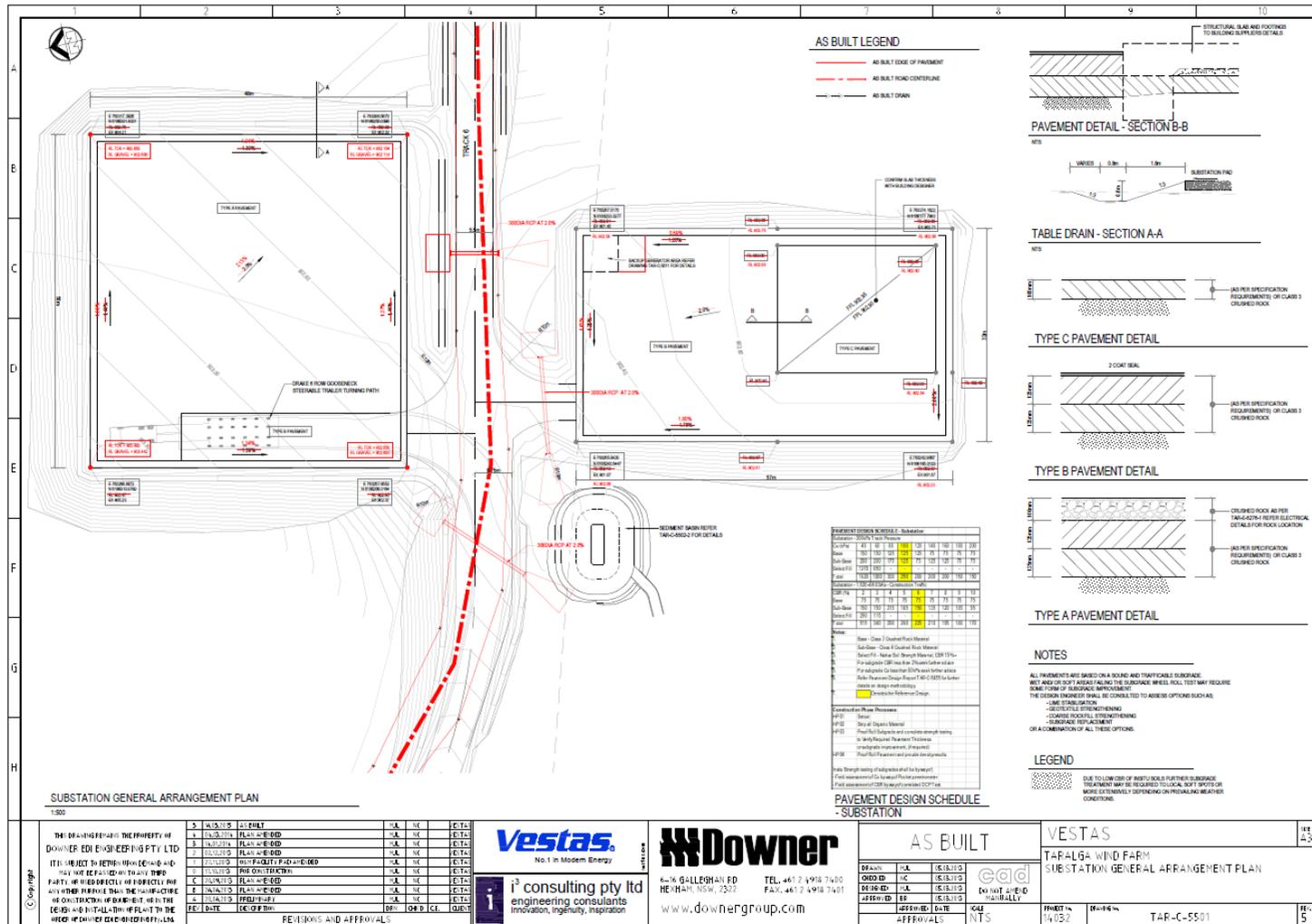


Figure 2-6 Substation Set Out

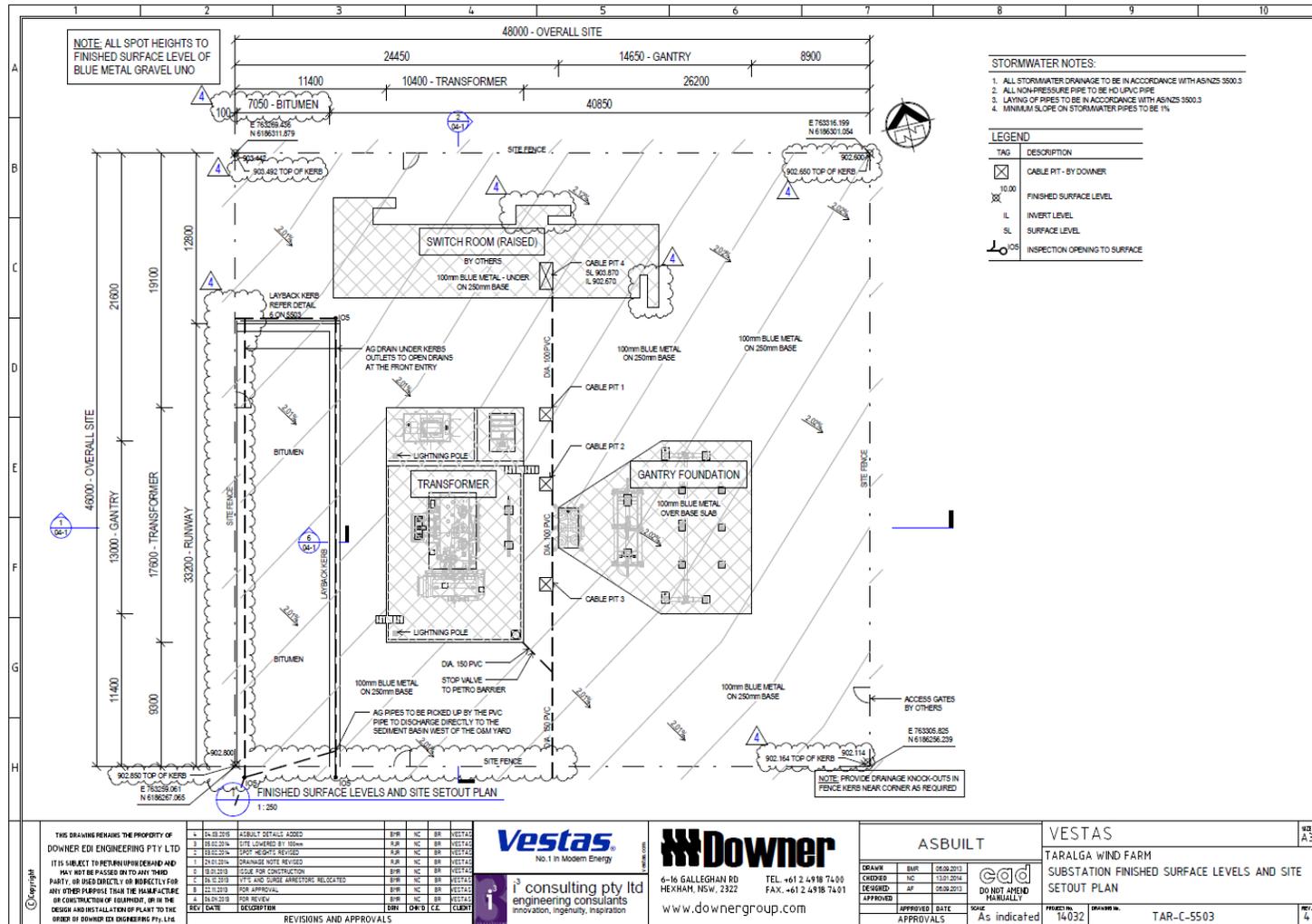
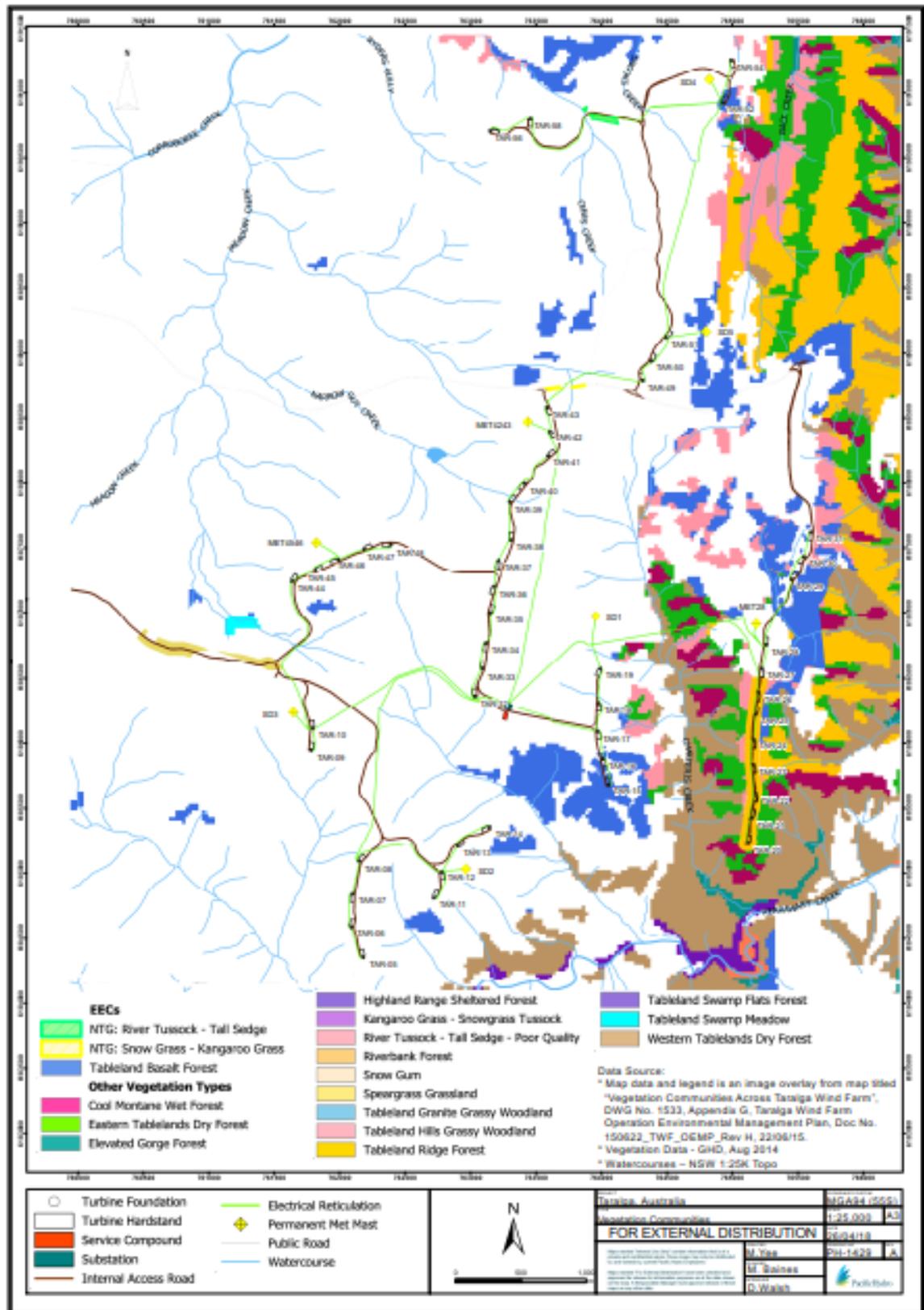


Figure 2-7 Mapped Ecological Communities



3. Chemicals and Materials

3.1 Inventory

Chemicals and materials that are either being used or are stored within the TWF activity area are listed in Table 3-1 Chemicals and, Materials Location together with the locations shown where they may be present and maximum potential volumes.

Table 3-1 Chemicals and, Materials Location and Volumes

Chemicals and Materials	Location, Volumes and Disposal			
	Substation	Service Compound	Hardstand and Wind Turbine Structure	Disposal Method
Oil - insulating	50,000 litres			Not applicable. Utilised onsite. No surplus required to be disposed of
Oil - hydraulic		400 litres	80 litres	Not applicable. Utilised onsite. No surplus required to be disposed of
Oil - engine		100 litres		Not applicable. Utilised onsite. No surplus required to be disposed of
Gear Oil		1000 litres	400 litres	Not applicable. Utilised onsite. No surplus required to be disposed of
Grease		1000 kg	80 kg	Not applicable. Utilised onsite. No surplus required to be disposed of
Oil – waste		5000 litres		EPA Waste transport as prescribed waste
Oily rags		200 kg		EPA Waste transport as prescribed waste
Coolants		1000 litres	400 litres	
Fuel		3000 litres		Not applicable. Utilised onsite. No surplus required to be disposed of
Batteries	108 x 110vDC cells	500 x 12v dc cells		Transported for offsite recycling
Cleaning		100 litres		Not applicable. Utilised onsite. No surplus required to be

Chemicals and Materials	Location, Volumes and Disposal			
	Substation	Service Compound	Hardstand and Wind Turbine Structure	Disposal Method
agents				disposed of
Solvents		x30 litres		Not applicable. Utilised onsite. No surplus required to be disposed of
Paints		x10 litres		Not applicable. Utilised onsite. No surplus required to be disposed of
Herbicides		x20 litres		Not applicable. Utilised onsite. No surplus required to be disposed of
Sewage		x7000 litres		Onsite septic system approved by ULSC
Paper, Cardboard & Plastics		-		Transported for offsite recycling
Metal		-		Transported for offsite recycling
Food scraps and organic matter		-		Disposed of in general waste
Domestic waste		-		Disposed of in general waste
Timber & general packaging		-		Disposed of in general waste
Cable off cuts (Electrical Repairs)		-		Disposed of in general waste

4. Pollution Incident

An environmental incident can be defined as an unexpected event that may result in harm to the environment and requires some action to minimise the impact or restore the environment.

Pollution is the introduction of substances into water, land or the atmosphere, so that the condition is adversely altered to be:

- Detrimental to its use; or
- Harmful to the health or welfare of humans, animals or plants.

4.1 Environmental Aspects

Pacific Hydro has identified the environmental aspects that potentially could be impacted upon by the TWF. These are identified in the OEMP and include the following:

- Native flora and fauna;
- Air;
- Soil;
- Water;
- Cultural heritage;
- Telecommunications;
- Waste;
- Weeds and pests;
- Traffic;
- Noise;
- Erosion and Sedimentation; and
- Bushfire.

4.2 Pollution Incidence Impacts, Risk and Mitigation

The environmental aspects associated with pollution incidents throughout the operation of TWF and to which must be mitigated against are summarised by location below.

4.2.1 Service Compound

Table 4-1 Service Compound Impact, Risk & Mitigation

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
Noise	Resulting from onsite operations and maintenance activities of personnel, vehicles and machinery	A standard set of working hours will be employed	Low	OEMP - Section 4.8 Complaints OEMP - Section 9.2.3 Site Access Times OEMP Appendix D Noise Management Plan
Soil / water / waste	If chemicals, materials and wastes are not stored correctly, there is a risk of leaks or spills, which may result in environmental pollution	Regular inspections (including quarterly inspections) of operational activities and environmental performance will be undertaken by the Regional Services Manager NSW EPA audits inspection of facilities Annual Lenders audit inspection of facilities Utilisation of bunded shipping containers and cabinets in the service compound Procedures for maintenance and spill recovery are in place An oil spill kit is located at the Service Compound	Low	OEMP - Section 10.2 Waste Types OEMP - Appendix D

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
		<p>as shown in Figure 2-2 and each service vehicle</p> <p>Wastes are segregated and stored in appropriate containers</p> <p>Waste not to be received and stored from off-site</p> <p>Engage a licensed waste collector to empty system when required</p> <p>Reduce the need for hazardous waste on site where possible</p> <p>Disposal of waste in accordance with the relevant guidelines</p> <p>Liquid and non-liquid waste is assessed and classified in accordance with Waste Classification Guidelines Part 1: Classifying Waste (DECC, 2008)</p> <p>All hazardous materials and controlled waste handled and disposed of as per the MSDS for each material</p>		
Soil / water	Failure of the on-site septic system	<p>The septic system has been installed to a specific standard and approved by Upper Lachlan Shire Council (ULSC)</p> <p>Quarterly maintenance of the system by a qualified contractor</p> <p>Engage a licensed waste collector to empty system when required</p>	Low	<p>OEMP - Section 10.2 Waste Types</p> <p>OEMP - Appendix D</p>

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
		Environment Compliance Monitoring Program and Procedure and Environmental Audit Schedule		

4.2.2 Substation

Table 4-2 Substation Impact, Risk & Mitigation

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
Noise	The onsite substation may on occasion emit a characteristic 'hum' during operations	The location of the substation has avoided noise impacts due to the distance to the nearest receptor Regular inspections may pick up on un-characteristic noise and implementation of regular maintenance	Low	OEMP - Section 4.8 Complaints OEMP Appendix D Noise Management Plan
Soil / water	The main transformer contains approximately 31,040 litres of insulating oil and the auxiliary transformer contains 825 litres. Leak or failure would release oil into the concrete bund that drains to a large oil/water separator	Regular inspections of operational activities and environmental performance will be undertaken by the Regional Services Manager Utilisation of concrete bund and oil water separator Procedures for maintenance and spill recovery are in place An oil spill kit is located at the Service Compound and each service vehicle as shown in Figure 2-2	Low	OEMP - Section 4.7 Environmental Incidents OEMP - Appendix D

4.2.3 Wind Turbines

Table 4-3 Wind Turbines Impact, Risk & Mitigation

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
Noise	Turbine aerodynamic or mechanical noise impacting on nearby receptors	<p>Noise mitigation measures such as curtailment is possible</p> <p>Pre and post noise compliance testing</p> <p>Turbines are inspected and maintained to ensure they operate as intended</p> <p>The wind farm’s contract with the WTG supplier includes guaranteed maximum sound power levels and tonality performance for each WTG type</p> <p>Ameliorative measures may be provided to the receivers H1, H5, H7 H12 or ‘the Farm’ if requested within the specified time</p> <p>The location of the substation has avoided noise impacts due to the distance to the nearest receptor</p> <p>Regular inspections may pick up on un-characteristic noise and implementation of regular maintenance</p>	Low	<p>OEMP - Section 4.8 Complaints</p> <p>OEMP - Appendix D Noise Management Plan</p>
Soil / water	Servicing of turbines	<p>Generally low levels of oil and grease volumes as there are no gearboxes</p> <p>Spills or leaks would be localised</p> <p>Regular inspections of operational activities and environmental performance will be undertaken by the Regional Services Manager</p>	Low	<p>OEMP - Section 10.2 Waste Types</p> <p>OEMP - Appendix D</p>

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
		<p>Procedures for maintenance and spill recovery are in place</p> <p>An oil spill kit is located at the Service Compound and each service vehicle as shown in Figure 2-2</p>		

4.2.4 Access Tracks and Hardstands

Table 4-4 Access Tracks and Hardstands Impact, Risk & Mitigation

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
Noise	General operation and maintenance activities can contribute to noise	A standard set of working hours will be employed	Low	<p>Section 4.8; OEMP</p> <p>OEMP - Section 9.2.3 Site Access Times</p> <p>OEMP Appendix D Noise Management Plan</p>
Soil / water	Erosion of hardstands, tracks, drains and/or batters with potential to transfer of sediment to water	<p>Rehabilitation activities transferred from construction into operations phase</p> <p>New excavation work, such as for maintenance of cable repairs, provision of additional drainage and erosion controls and major road repairs are possible during operation but are expected to occur very infrequently</p> <p>Regular site inspections to monitor ground stability and performance of sediment and erosion</p>	Low	<p>OEMP - Section 5 5. Rehabilitation, Soil and Water Quality Management Plan</p> <p>OEMP - Appendix D</p>

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
		controls Fencing off areas from stock where required Allow natural regeneration Defects liability period - contractor to manage rehabilitation of disturbed areas where required Environment Compliance Monitoring Program and Procedure and Environmental Audit Schedule No access off Site roads and hardstands without Pacific Hydro approval		
Soil / water	Vehicles, machinery and equipment contain hydrocarbons where failure of pipes etc. or refuelling could result in a spill or leak	In-built containment of oil leakage such as concrete bunding in the substation and plastic bunding for chemical and material storage Any material on the hardstand or access tracks which is contaminated by hydrocarbons can either be treated onsite or removed as prescribed waste Procedures for maintenance and spill recovery are in place and oil spill kit is located at the Service Compound and each service vehicle as shown in Figure 2-2 Regular inspections of operational activities and environmental performance will be undertaken by the Regional Services Manager	Low	OEMP - Section 10.2 Waste Types OEMP - Appendix D
Soil / water	Failure of installed sediment and erosion	All quarterly environmental site inspections undertaken of the licenced area including tracks,	As per Appendix	OEMP - Section 5 Rehabilitation, Soil

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
	controls or heavy rain	<p>hardstands and sediment traps</p> <p>Rehabilitate disturbed areas by allowing natural regeneration or rock cover</p> <p>Repairs to be undertaken as required including cleaning and removal of sediment from culverts and rock check banks once 50% full</p> <p>Removal of sediment and erosion controls in a manner that does not cause ongoing soil erosion or environmental harm but only if the targets in the following scenarios have been achieved:</p> <ul style="list-style-type: none"> disturbed areas between T20-T27 rehabilitated to at least 50% ground cover disturbed areas everywhere else rehabilitated to at least 70% ground cover <p>Environment Compliance Monitoring Program and Procedure and Environmental Audit Schedule</p> <p>Two areas identified in Section 5.2.1 (OEMP) impacted by stock management are currently being monitored for rehabilitation and fencing requirements</p>	E – Soil and Water Drawings and Table 6 of the OEMP	and Water Quality Management Plan OEMP - Appendix D Appendix E Soil and Water Management Drawings
Air	Dust generated from use of access tracks, any un-stabilised surfaces or areas of broken ground	<p>Rehabilitation, Soil, Water and Quality Management Plan contains controls for reducing risk of excessive dust generations</p> <p>Vehicles carry loads likely to cause dust must be covered</p>	Low	OEMP - Section 5 Rehabilitation, Soil and Water Quality Management Plan

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
		Comply with 40km/h speed limit Scheduling of works to avoid dry and windy conditions Implementation of Environment Compliance Monitoring Program and Procedure and Environmental Audit Schedule		
Air	Vehicle emissions due to increase in activity of earthmoving / transport vehicles / machinery or use of old / un-maintained vehicles, machines and equipment	Use of serviced and well maintained vehicles, machinery and equipment	Low	

4.2.5 Other Sensitive Aspects

Table 4-5 Other Impacts, Risks & Mitigations

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
Telecommunications	The failure of the TV transmitter causing disruption to the local community	TV re-transmitter annual maintenance performed as per schedule Investigation and resolution of television interference complaints	Low	OEMP - Section 11 Electromagnetic Interference Plan
Flora and fauna / cultural heritage	A pollution incidence could impact native	Mapped ecological communities and cultural heritage areas are shown in Figure 2-7 Mapped	Low	OEMP - Appendix A Site Plans

Aspect	Impact or Risk	Mitigation	Risk Rating	Reference
	vegetation or ecological community	Ecological Communities		

4.3 Proponent, Contractors and other Stakeholders

Pacific Hydro is the proponent for TWF. All contractors engaged to undertake work at the wind farm are required to undertake a project induction in accordance with the OEMP and provisions of the Project Approval and EPL 20429.

4.3.1 Non TWF Activities

A television re-transmitter is maintained by Pacific Hydro with the assistance of Satellite Television and Radio Australia (STRA). STRA undergo a Site Induction before they can enter the TWF.

Landowners conduct farming activities across the extent of the project activity area which from a pollution perspective can include application and subsequent leaching of pesticides, herbicides and fertilizers, irrigation causing accumulation of heavy metals in water bodies, tillage of soils contributing to nitrous oxide emissions, manure being transferred into waterways and general agricultural land use such as livestock activity contributing to soil erosion and water quality degradation.

5. Environmental Management System

5.1 Pacific Hydro Certification to ISO 14001

Pacific Hydro's Health, Safety, Environment and Quality Management System (HSEQ MS) conforms to, and is independently certified to, the requirements of ISO 14001 (Environmental Management System). Pacific Hydro Pty Ltd was re-certified on 14 August 2018 and is due for revision 31 August 2021.

Through its HSEQ management system, Pacific Hydro is obliged to meet the following four basic commitments:

- Compliance with legal and other requirements;
- Aim of keeping our people, contractors and the public free from harm;
- Prevention of pollution; and
- Continual improvement

5.2 OEMP

The OEMP has been prepared in line with *Guideline for the Preparation of Environmental Management Plans* (DIPNR 2004) and in accordance with **Condition 26** of the Conditions of Consent. The OEMP addresses the following, where relevant to the operation of the Wind Farm:

- Conditions of Consent issued by the DPE under the EP&A Act;
- Conditions of the EPL issued by the NSW EPA under the POEO Act; and
- Other environmental legislation and regulatory requirements.

5.3 HSEQ Risk Management Procedure

Pacific Hydro's HSEQ MS contains a Risk Management Assessment Procedure applicable to the Wind Farm Risks associated with Wind Farm operation are reviewed as required based on events or legislative changes.

Risks that relate to environmental issues are detailed in Pacific Hydro's Environmental Impacts and Aspects Register for Taralga Wind Farm. This document is a management system document subject to regular updates. A PDF version is available on the Taralga Wind Farm Website <https://www.taralga-windfarm.com.au>.

6. Pollution Incident Response

A complete list of Emergency Contacts is displayed in the Site Office a comprehensive emergency contact list is provided below in the event of a pollution incident.

6.1 Contact Lists

Table 6-1 Contact Lists PHA / Vestas

Item	PHA / Vestas	Contact	Details
1	Site Supervisor	Edwardo Dos Santos (Vestas)	TBA
2	PHA Regional Services Manager	Julian King (Pacific Hydro)	0477 012 133
3	Contractor HSE Representative	Jason Cook (Vestas)	TBA
4	PHA Environment and Development Manager	Kim Derriman (Pacific Hydro)	03 8621 6457

Table 6-2 Contact Lists Authority

Authority	Contact	Details
Environmental Representative	Shireen Baguley (Molino Stewart)	02 9354 0300
Local Authority	Upper Lachlan Shire Council	02 4830 1000
Local Authority	Crookwell After Hours Emergencies	0429 786 659
Environment Line	EPA / OEH 24 hr hotline	13 15 55
State Emergency Services	Floods and storms	132 500
NSW Fire and Rescue	-	1300 729 579 or 000
Ambulance	-	000
Police	-	000
Hospital	Crookwell District Hospital	02 4832 1300
Ministry of Health via the local Public Health Unit		
SafeWork NSW	-	13 10 50
NSW Poisons Information Hotline	-	131 126
Roads and Maritime	-	132 213

Authority	Contact	Details
Services		

6.2 Responsibilities

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:

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

Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurs, have a duty to report the incident..

6.3 Communication with the Local Community

Mechanisms for communicating a pollution incidence to affected landholders and the local community include already established lines of communication within the Pacific Hydro Engagement and External Affairs Team.

Should a pollution incident occur, the person discovering the pollution incident is to notify the site supervisor (or their Delegated Authority) who will then immediately notify the Regional Services Manager (or their Delegated Authority). The Regional Services Manager will then request the Pacific Hydro Engagement and External Affairs Team to contact the relevant landholders.

6.4 Immediate Action to Take In Case of a Pollution Incident

Section 148 of the POEO Act sets out requirements for notifications where a pollution incident causes or threatens material harm to the environment. A person carrying out the activity must, immediately after the person becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it. The responsibility for notification extends to employees and occupant of the land depending on the circumstances and awareness of the incident.

Pacific Hydro has an Incident Reporting and Investigation Procedure (PHA.HSE.10.001)

The procedure describes the action to be taken in case there is an incident. Immediate action must be taken to control the immediate risk to the environment, persons or property.

Persons whose activities have contaminated land and owners of land who become aware, or ought reasonably to be aware, that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination. A person has a duty to notify if that person ought reasonably to have been aware of the contamination.

Note: A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.*

EPA NSW, including other relevant authority listed and owners or occupiers of premises in the vicinity or likely to be impacted by a pollution incident as listed in Section 6.1, must be notified immediately about pollution incidents causing or threatening material harm to the environment.

If a pollution incident has the potential to affected external parties Figure 2-3 above can be used to establish which landholder/s will be affected.

6.4.1 Generic Pollution Incident Response

As soon as practicable after becoming aware of the incident or contamination the key actions are provided in the following table:

Table 6-3 Key Actions for Pollution Incidence Response – Generic

Job Title	Duties	
All personnel	1	Call 000 if the incident presents an <u>immediate</u> threat to human health, property or receiving environment Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, they are responsible for controlling and containing incidents.
	2	Stop all works and raise the alarm by contacting the Site Supervisor.
	3	Only if safe to do so attempt to eliminate and contain.
	4	If unsafe, evacuate to the emergency assembly area.
Site Supervisor	1	Notify Pacific Hydro Regional Services Manager and Vestas representative (or Delegated Authority).
Regional Services Manager	1	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. <ol style="list-style-type: none"> 1. Environment Line EPA / OEHS 24 hr hotline 13 15 55 2. Local Authority - Upper Lachlan Shire Council 02 4830 1000 <ol style="list-style-type: none"> i. Local Authority Crookwell After Hours Emergencies 0429 786 659 3. Ministry of Health via Crookwell District Hospital 02 4832 1300 4. SafeWork NSW (formerly WorkCover) – phone 13 10 50 5. Fire and Rescue NSW – phone 1300 729 579 <p><i>Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again</i></p>
	2	Notify Pacific Hydro Executive Manager for Operations and Engagement and External Affairs team of incident and keep informed.
	3	Investigate reasons for incident with Environment and Development Manager
	4	As necessary, amend procedures or facilities to avoid recurrence
	5	Review and update PIRMP as necessary (considering need for further testing of PIRMP) as per Section 6.6 below.
	6	Obtain close out of incident.
Executive Manager for Operations	1	Notify General Manager for Australia and Environment and Development Manager
Engagement and External Affairs	1	Notify landowner/s of a pollution incident via established means of communications.
	2	Liaise with Media and provide a statement as required.
Environment and Development Manager	1	Investigate reasons for incident with Regional Services Manager
	2	As necessary, amend procedures or facilities to avoid recurrence.
	3	Review and update PIRMP as necessary (considering need for further testing of PIRMP) as per Section 6.6 below.

6.4.2 Bushfire Pollution Incident Response

In the event that a bushfire or grass fire does occur on the site or in neighbouring properties the following steps in Table 6-4 below should be followed.

Table 6-4 Key Actions for Pollution Incidence Response - Bushfire

Job Title	Duties
-----------	--------

Job Title	Duties	
All personnel	1	Call 000 if the incident presents an <u>immediate</u> threat to human health, property or receiving environment. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, they are responsible for controlling and containing incidents.
	2	Stop all works and raise the alarm by contacting the Site Supervisor
	3	Attempt to extinguish fire only if safe, you are trained and there is an escape route.
	4	If unsafe to extinguish, evacuate to the emergency assembly area.
Site Supervisor	1	Advise Regional Services Manager that there is a fire onsite.
	2	Secure the site and ensure no persons enter the site and all personnel are accounted for.
	3	Advise NSW Rural Fire Service as required 1300 729 579
	4	If required despatch a person to main gate to meet arriving Emergency Services and escort to location of fire.
	5	At the earliest possible time, complete an incident report form.
Regional Services Manager	1	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. <ol style="list-style-type: none"> 1. Environment Line EPA / OEH 24 hr hotline 13 15 55 2. Local Authority - Upper Lachlan Shire Council 02 4830 1000 <ol style="list-style-type: none"> i. Local Authority Crookwell After Hours Emergencies 0429 786 659 3. Ministry of Health via Crookwell District Hospital 02 4832 1300 4. SafeWork NSW (formerly WorkCover) – phone 13 10 50 5. Fire and Rescue NSW – phone 1300 729 579 <p><i>Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again</i></p>
	2	Notify Pacific Hydro Executive Manager for Operations and Engagement and External Affairs team of incident and keep informed.
	3	Investigate reasons for incident with Environment and Development Manager
	4	As necessary, amend procedures or facilities to avoid recurrence
	5	Review and update PIRMP as necessary (considering need for further testing of PIRMP) as per Section 6.6 below.
	6	Obtain close out of incident.
Executive Manager for Operations	1	Notify General Manager for Australia and Engagement and External Affairs team of incident and keep informed.
Engagement and External Affairs	1	Notify landowners of bushfire via established means of communications
	2	Liaise with Media and provide a statement as required.

6.4.3 Spill Pollution Incident Response

A spill is classified as the discharge of any liquid/gas or dangerous good or hazardous substance into the environment. Potential hazards created by the spill will vary for humans, vegetation, water resources, fish and wildlife and is dependent on several factors, including nature of the material, the amount spilled, the location of the release and the season/weather conditions.

Table 6-5 Key Actions for Pollution Incidence Response - Spill

Job Title	Duties	
All personnel	1	Call 000 if the incident presents an <u>immediate</u> threat to human health, property or receiving environment. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, they are responsible for controlling and containing incidents.
	2	If spill or leak is being generated by a piece of plant, shut the plant down to reduce the flow.
	3	Notify site supervisor of spill or release and if it has entered a water course or water storage.
	5	Use spill kit located in the service van to control the spilled or released substance
	6	Consult the SDS located at Services Compound for the chemical released, correct PPE and disposal requirements.
	7	Ensure all personnel are moved to a safer location away from the spill.
	8	Livestock managed around spill (if applicable)
	Site supervisor	1
2		If the spill is 5 litres or more notify Regional Services Manager.
3		If the spill is down the side of a WTG the tower should be cleaned of any oil.
Regional Services Manager	1	If the spill does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. <ol style="list-style-type: none"> 1. Environment Line EPA / OEH 24 hr hotline 13 15 55 2. Local Authority - Upper Lachlan Shire Council 02 4830 1000 <ol style="list-style-type: none"> i. Local Authority Crookwell After Hours Emergencies 0429 786 659 3. Ministry of Health via Crookwell District Hospital 02 4832 1300 4. SafeWork NSW (formerly WorkCover) – phone 13 10 50 5. Fire and Rescue NSW – phone 1300 729 579 <p><i>Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again</i></p>
	2	Notify Pacific Hydro Executive Manager for Operations and Engagement and External Affairs team of incident and keep informed.
	3	Investigate reasons for incident with Environment and Development Manager
	4	As necessary, amend procedures or facilities to avoid recurrence
	5	Review and update PIRMP as necessary (considering need for further testing of PIRMP) as per Section 6.6 below.
	6	Obtain close out of incident.
Executive Manager for Operations	1	If the spill is 5 litres or more notify General Manager for Australia and Environment and Development Manager.
Engagement and External Affairs	1	Inform the affected landholder and discuss
	2	Liaise with Media and provide a statement as required.
Environment and Development Manager	1	Investigate reasons for incident with Regional Services Manager
	2	As necessary, amend procedures or facilities to avoid recurrence.
	3	Review and update PIRMP as necessary (considering need for further testing of PIRMP) as per Section 6.6 below.

6.5 Training and Education

All site staff, subcontractors and consultants will be required to undergo a Site Induction which will include information on standard environmental practices on-site. Details of the Site Induction are discussed further in the OEMP but discuss topics such as:

- The objectives of the OEMP and Environmental Policy;
- Key environmental risks and requirements; and
- An outline of the process for recording incidents, near misses and risks.

6.6 Audit and Review of the PIRMP

EPA guidance states that it is a legislative requirement that PIRMPs must be tested as follows:

- Routinely tested at least once every 12 months; and
- Within one month of any pollution incident occurring in the course of any activity to which the licence relates.

Should the Plan be incorporated in another site management document then that document will need to be routinely tested as per the requirements of 153C of the POEO Act and Section 98E of the POEO (G) Regulation:

- Testing methods may include undertaking desktop simulations and/or practical exercises or drills;
- Testing must cover all components of the plan, including the effectiveness of training; and
- Training could involve selecting a potential incident identified in the PIRMP and reviewing the processes for notifications, actions to be taken to reduce or control pollution, process for coordination with agencies and other responders, the suitability of information in the PIRMP, identifying any gaps in the PIRMP and other matters such as adequacy of inventories and currency of contact details.

Details of the test of the PIRMP need to be recorded and where the PIRMP is updated it should be uploaded to the TWF website. Details of each test and review are contained in **Error! Reference source not found.** on Page **Error! Bookmark not defined.** **Error! Reference source not found.**

The EPA advises that significant penalties apply for not complying with this requirement.