Report

Pollution Incident Response Management Plan

Crookwell Wind Farm.
Feb, 2020

Contents

Document Control

Rev:	Date:	Responsible:	Action:	Reviewed by:	Approved by:
1	Feb2020	N.HICKS	Updated Map and contact details	Nigel Hicks	Nigel Hicks

1. Introduction.

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

1.1. Legislative Context.

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

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

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

2. Background.

The Crookwell 2 Wind Farm (C2WF) Project is located in the southern tablelands region of NSW, approximately 14km southeast of Crookwell, (population approx. 2,500) and approximately 30km northwest of Goulburn (population approx. 24,000). The C2WF site covers an area of 2,088 hectares and is within the Upper Lachlan Shire Local Government Area, and is surrounded by predominantly grazing properties. Operation of the C2WF is an important part of the Australian Capital Territory Government's 100% renewable energy commitment by 2020.

The Minister for Infrastructure and Planning, originally granted development consent in June 2005 for the C2WF (DA 176-8-2004-i). The proposal was assessed, in accordance with the NSW Environmental Planning and Assessment Act 1979 (EP&A Act), under Part 4. A modification to the Project Approval (Modification 2) was granted on October 31 2017 and allows the following:

- Up to 32 wind turbines (the maximum allowed under the Modification Application (Modification-2) of the approved C2WF; however, according to the Deed of Entitlement, a maximum of 28 wind turbines will be installed at the C2WF site for the ACT Feed-in Tariff contract).

- A network of site tracks to provide access to each turbine on the site and to the substation and a network of underground electrical and communications cables. The electrical substation and switchyard, connecting C2WF to TransGrid's electrical transmission system; and a site control room / facility building.

An Environmental Protection License (EPL) is required for the operation of wind farms in NSW under Protection of the Environmental Operations Amendment (Scheduled Activities) Regulation 2013 which commenced on 10 April 2017. A license has been obtained by the Proponent (20911) and it will be maintained by the Owners Representative throughout the life of the project. Monitoring/compliance actions will be undertaken in accordance with the conditions of the EPL.

C2WF has a total wind farm generating capacity of 91MW (this generation capacity is maximum output at the connection point once electrical losses and additional curtailment are included, as set out in the Deed of Entitlement between the Australian Capital Territory and Crookwell Development Pty Ltd).

Crookwell Development Pty Ltd. Is the company that holding the rights for the 91 MW Crookwell 2 Wind Farm. GPG Australia Pty Ltd (GPG Australia) it's the Australian subsidiary of Global Power Generation (GPG), GPG Australia is the 100% owner of Crookwell Development Pty Ltd (CDPL).

General Electric (GE) is contracted for the operation and integrated maintenance of the turbines and associated control infrastructure. It should be noted that GE supplied and installed the wind turbines and will operate under its own technical guidance's. TransGrip owns the substation and operates it too.

The wind farm became fully operational on 14th December, 2018

2.1. Onsite Infrastructure

The access to the Crookwell 2 Wind Farm is via Crookwell Road and Woodhouselee Road. The site is located on a system of ridges and low hills that are separated by the Wollondilly River and the Goulburn-Crookwell Road corridor. The surrounding area is rural in character and features undulating hills with some steeper slopes around valleys.

The wind farm consists of;

- 28 x 3.4MW General Electric Wind Turbines,
- 33kV underground cable network
- Road and drainage network
- Landscaping and fencing
- 330kV Substation and Switch-yard (owned and operated by TransGrid)
- 33kV Switch-room inclusive of communications and control equipment

Hazardous Substance Storage Containers, and waste storage areas are located on WTG27 hard-stand and consist of the follow items;

- Class 3 Flammable Goods Storage (waste oil and lubricants)
- Class 8 Dangerous Goods Storage (for lead/acid batteries)
- Paper and Carboard 3m^3 Recycling Bin Skip
- General Waste 3m^3 Bin Skip

There are no workshop facilities on site.

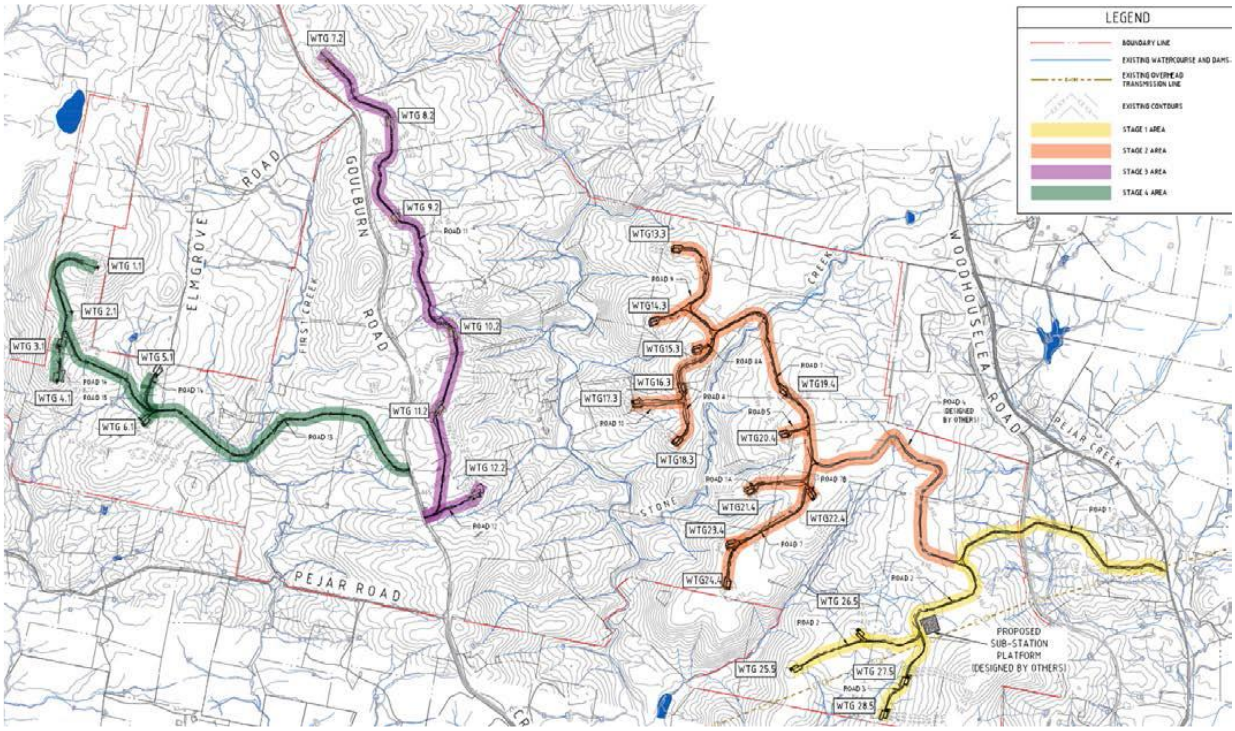


Image 1: Site Location

3. Requirements

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

3.1. Relationship with other emergency plan

GE (as operator of the park) has developed a *Project Emergency Management Plan* (last version: 02 may 2019). That Plan is prepared to describe the procedures that have been implemented to allow personnel to plan for and to respond to emergency situations at the C2WF site. It applies to all site level emergencies and to all personnel onsite including Employees, Subcontractors and Visitors.

The Project Manager shall review the plan at twelve (12) month intervals, when significant changes occur (i.e. access and egress changes) and after major emergencies, to evaluate its effectiveness. GE will operate and maintain the Wind Farm on behalf of GPG.

TransGrid, as the owner and operator of the substation, has also developed its own *Emergency Response Manual* (MNA-SUB-ERM-270)

The information contained in the *Project Emergency Management Plan* (last version: 02 may 2019) of GE and in the *Emergency Response Manual* (MNA-SUB-ERM-270) of TransGrid, has been taken into account for the preparation of this Pollution Incident Response Management Plan (PIRMP)

3.2. Description and likelihood of hazards

Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in

which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise

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

a) Harm to the environment is material if:
    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 $10,000AUD (or such other amount as is prescribed by the regulations), and
b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment."

All personnel (employer, occupier or other person carrying on the activity) shall report all actual environmental incidents immediately to the Environmental Representative and/or C2WF O&M Manager (GPG) or Site Services (GE). It is the responsibility of the Environmental Representative or nominated person(s) to fully investigate the occurrence with personnel involved in accordance with the 'Accident Investigation and Reporting' in PROSAFETY (corporative tool).

In the event of an environmental incident on site, the C2WF O&M Manager shall complete within 24 hours:

- Accident/Incident Report
- Accident Statement Report

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

3.2.1. Type of hazards

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

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

Table 1. Summary of environmental hazard

From the identification of hazards generated through work activities on site, GE/CDPL have develop Process Procedures to manage the hazards associated with those activities.

3.2.2. Location of Potential hazards

Location	Description	Potential hazards
Wind turbines	There are 28 wind turbines within the C2WF layout. Each gearbox holds approx. 500L of oil	• Contamination of site environments. • Affected livestock form waste digestion. • Impacts to human health during handling or clean-up activities • Contamination of ground/ potential runoff to ground and waterways
Substation	• The C2WF substation transformers with an insulating oil capacity of 54,000L litres in total. • A Diesel Generator is located in the compound.	• Contamination of site environments. • Affected livestock form waste digestion. • Impacts to human health during handling or clean-up activities • Contamination of ground/ potential runoff to ground and waterways • Potential to intermittently generate both noise and light pollution
Site Operations (including waste management area)	• The O&M site includes the 33kV Switch-room, and a gravelled compound area around the switching room and the substation. • 33kV Breakers are filled with SF6 arc suppressing gas	• Damage to heritage, sediment and erosion run off. • Contamination of site environments. • Air Pollution (from release of SF6 gas)
Hazardous Substance Storage Areas	• Chemicals associated with the operation and maintenance of onsite turbines are stored at the WTG.27 Hard-stand in bunded containers. Stored materials include; • Waste oil, filters and lubricants • Used Lead/Acid 12V Batteries • Empty lubricant cartridges \ • General waste	• Damage to heritage, sediment and erosion run off. • Contamination of site environments.

	• Paper and Cardboard	
Sewage	• The sewage management facility consists of a 3000 litre septic tank and 10m2 absorption bed area. • During longer duration maintenance activities portable toilets are provided for use by onsite service staff.	• Contamination of site environments. • Impacts to human health during handling or clean-up activities. • Contamination of ground/ potential runoff to ground and waterway. • Impacts to flora and fauna
Access	• There is approximately 12km of access tracks within the wind farm footprint. • There are 28 individual hardstand areas located adjacent to each of the onsite wind turbines.	• Dust emissions and sediment release associated with the erosion of running tracks and batter slopes
Weed infested areas	The wind farm is located within actively utilized farming properties.	• Introduction of Noxious Weeds: biosecurity risks

Table 2. Location of environmental hazard

3.2.3. EHS RISK ASSESSMENT by GE

GE is contracted for the operation and integrated maintenance of the turbines and associated control infrastructure. It should be noted that GE supplied and installed the wind turbines and will operate under its own technical guidance's. The following is a summary of the environmental risks evaluated by GE and GPG for operation and maintenance

ENVIRONMENTAL RISK ASSESSMENT (*)

Likelihood (L) 1= Rare, 2 = Possible, 3 = Probable/Likely, 4 = Almost certain — **Consequence (C)** 1= Minor,2 = Significant, 3 = Severe , 4 = Major

Risk Rating (R)	LOW [1-4] – Reviewed & Approved By Site EHS Coordinator – No Further Action Required	MEDIUM [6-8] - Reviewed & Approved By Site EHS Supervisor – Action required, Risk Controls to be Implemented.	HIGH [9- 16] – Reviewed & Approved By Site EHS Supervisor – Not Acceptable, MUST be Reduced to Yellow or Green (With Risk Controls in Place)

Item No.	Activity (Basic Job steps)	Activity (Detailed Job Steps)	Potential Hazards (What Can Go Wrong)	Without Controls Initial Risk [L x C=R]			Control Measures		Hierarchy Of Controls Applied					Without Controls Initial Risk [L x C=R]			Person / s Responsible		Review / Comments
				L	C	R	Primary Controlls	Additional Controlls & Comments	Elimination	Substitution	Engineering	Administration	PPE	L	C	R	By Whom	When	
TRANSPORT (MAJOR COMPNENTS)	OPERATION PLANT	GENERAL OPERATION PLANT	Hydraulic hose failure causing oil spillage	3	2	M	Spill response instruction Site Induction	Crookwell SWP Management Plan				x		2	2	L	SM,SUP,SO	Arrival on site.	Transport stage
		Excessive noise	Noise induced hearing loss to operators and other personnel	4	3	H	Noise Monitoring Health Surveillance Site Induction	Health Surveillance Crookwell SWP Management Plan				x	x	1	3	L	SM,SUP,SO	Arrival on site.	Transport stage
			Disturbance to flora and fauna	3	3	H	Site Induction	Environmental Management Plan				x		1	3	L	SM,SUP,SO	Arrival on site.	Transport stage
			Disturbance to local residents and businesses	3	3	H	Site Induction	Any general public queries shall either be referred to the Site Manager				x		1	3	L	SM,SUP,SO	Arrival on site.	Transport stage
		Refuelling and Plant maintenance	oil or diesel spill	3	3	H	SRA/SWMS template Site Specific Induction	Relevant Plant risk assessments				x		2	3	M	SM,SUP,SO	Arrival on site.	Transport stage
		Plant Exhaust	Atmospheric emissions released into the air	3	2	M	Relevant Plant risk assessments	Refer to Manufactures Specification hand book				x		1	2	L	SM,SUP,SO	Arrival on site.	Transport stage

Risk Rating (R)		LOW [1-4] – Reviewed & Approved By Site EHS Coordinator – No Further Action Required					MEDIUM [6-8] - Reviewed & Approved By Site EHS Supervisor – Action required, Risk Controls to be Implemented.							HIGH [9- 16] – Reviewed & Approved By Site EHS Supervisor – Not Acceptable, MUST be Reduced to Tolerable or Green (With Risk Controls in Place)					
Item No.	Activity (Basic Job Steps)	Activity (Detailed Job Steps)	Potential Hazards (What Can Go Wrong)	Without Controls Initial Risk [L x C=R]			Control Measures		Hierarchy Of Controls Applied					With Controls Initial Risk [L x C=R]			Person / s Responsible		Review / Comments
				L	C	R	Primary Controls	Additional Controls & Comments	Elimination	Substitute	Engineering	Administrat	PPE	L	C	R	By Whom	When	
OPERATIONS AND MAINTENANCE	Using hazardous substances	Hazardous Substances on site	Unknown hazardous substances on site	3	3	H	An approval hazardous substance checklist to be completed and submitted to with the relevant SDS for approval	Chemical management procedure				x		2	3	M	SM,SUP,SO	Arrival on site.	Transport,storage
		Storage of Hazardous Substances	Leaking of fumes, substances causing burns, skin infection, pulmonary disease and environmental pollution	3	3	H		SRA/SWMS template Site Specific Induction WHS Management Plan WEHS Risk Register				x		2	3	M	SM,SUP,SO	Arrival on site.	Transport,storage
		Use of Hazardous Substances	Contact with substance through inhalation, ingestion or skin absorption causing burns, skin infection, pulmonary disease	3	3	H		SRA/SWMS template Site Specific Induction WHS Management Plan WEHS Risk Register				x		2	3	M	SM,SUP,SO	Arrival on site.	Transport,storage
	EMERGENCY	Bush Fire	Smoke inhalation Burns Entrapment Asphyxiation Property damage	2	2	L	Site ERP Fire fighting equipment installed in vehicles Emergency equipment register and inspections Audits and inspections Evacuation routes signed and clear Alternate site evac routes in case of restriction Personnel training refreshers RFS inspections Site roads able to accomodate fire	Hot works permit system Good housekeeping practices employed Chemical storage and inspections Electrical equipment maintenance and inspections FDR reviewed daily alternatives to hot works prioritised	x	x	x	x	x	1	2	2	SM,SUP,EHS	On Mob	Life of Project
		Uncontrolled material release (Spill/leak)	Burns Contamination Notifiable exceedance Property damage	2	2	L	Site ERP Site SWP Chemical management procedure Chemalert system subscribed Spill kits on site Bunded storage minimise decanting in the field Operate on roads only Annual chemical recap review Chemical approval process annual spill drill and training Tank based SRA	Contractor management Turbine and equipment design DG/HS specific storage Compliant OIL storage containment			x	x	x	1	2	L	SM,SUP,EHS	On Mob	Life of Project
		Lightning	Electric shock Electrocution Fire Damage to Property	2	4	M	Site SWP Site ERP Lightning response procedure Schneider weather alert system active, text enabled Radius system active Lightning dissipation system in turbine Fire fighting equipment available Evac drills carried out.				x	x		1	4	L	All	On Mob	Life of Project
	ENVIROMENTAL SITE CONDITIONS	Regulatory Compliance	EPA Compliance Unapproved plans Reputational Loss	3	3	H	Bird & Bat Plan Weed Management Plan Compliance Audits Compliance Calender (Genesuite)	Biodevirity Adaptive Management Plan Landholder & Community engagement Heritage Plan			x	x		3	2	M	SM,SUP,EHS	During Ops Tasks	Life of project
		Heritage Areas	Disturbance of Heritage areas Reputation loss	2	2	L	Site Induction Traffic Management plan - Sticking to designated tracks & roadways and hardstands Construction Heritage Plan for ground disturbance	Heritage Management Plan - Service Community and Landholder Management Plan (Action)			x	x		1	1	L	SM,SUP,EHS	During Ops Tasks	Life of project
		Waste Management Dangerous Goods Spills Sediment Noise	Waste Chemicals Weather Noise Reputation Loss	3	4	H	Waste Management Plan Approved Waste Contractor Chemical management procedure Vegetation & Biodiversity Adaptive Management plan Noise Management Plan Spill response training Spill response Kits Chemical Storage Cabinets			x		x	x	2	2	L	SM,SUP,EHS	During Ops Tasks	Life of project

3.3. Inventory of Hazardous Substances (Pollutants)

Potential pollutants that may be present on the operational wind farm site are listed Table 2 together with the storage locations and the quantity of the pollutant. More details on these pollutants are included in the site Safety data Sheets register available in the CR2WF Site Office.

Pollutant	*Location*	*Use*	*Volume stored*
Insulation Oil	Substation (TransGrid)	Insulation for onsite transformer	53,000L Total
Lubricating oil	Turbines site	Lubrication of moving parts	500L per Turbine
Diesel	Substation (TransGrid)	Emergency Generator	
Waste oil	Waste storage (WTG.27)	Awaiting removal by contractor	1500
Coolant	Turbines site	For cooling the wind turbine convertor	100L per Turbine
Lead/ Acid Batteries	Turbines site 33kV Switch Room Waste storage (WTG.27)	Emergency Power Supply	18 per Turbine
SF6 Gas	33kV Switch Room	Arc Suppression	
Sewage effluent	Septic tank	Toilet	3000L

Table 3. Inventory of pollutants

3.4. Safety equipment and preparedness

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

- First Aid Risk Assessment has been completed and implemented;
- First Aider Poster displayed in key locations onsite;
- Fire Risk Assessment has been completed and implemented;
- Personnel declare medical conditions at the time of their inductions;
- Emergency processes communicated at the inductions;
- Sufficient number of trained first aid personnel on site (as determined in the First Aid Risk Assessment);
- Resources necessary to respond to emergencies are available and accessible, for example:
    - Rescue equipment is available (especially during confined space work);
    - A chemical response kit is available; and
    - Fire-fighting equipment is available;
- The Site Hazardous Substance Register is up to date;
- Material Safety Data Sheets (SDS) are available for the chemicals that are in use on the site;
- Emergency Posters and site contact details are displayed, with current information;
- Responses to major plant /crane incidents (i.e. rollover, etc.) and collapse of ground incidents have been considered in the risk assessments (i.e. SWMS) for such tasks;
- An emergency assembly point is signposted; and
- Availability of emergency services and response times to different parts of the project.

3.5. Contact details

Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying on the activity

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

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

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

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

Service	Location	Contact	Distance to Site	Approximate Travel Time
Goulburn Base Hospital	130 Gold Smith Ave Goulburn NSW	(02) 4827 3111	28 km	20 min
Crookwell District Hospital Hospital	19 Kialla Rd, Crookwell NSW 2583	(02) 4832 1300	16km	12 min
Fire and Rescue NSW	161 / 157 Bourke St, Goulburn	(02) 4827 0400	29 km	21 min
Goulburn Police Open 24 hrs	274 Sloan St, Goulburn	(02) 4824 0799	30 km	23 min
Ambulance Station	18 Clifford St, Goulburn	(02) 4827 0400	29 km	23 min
SES Goulburn	Lanigans Lane 2580 Goulburn, New South Wales	13 25 00	31 km	24min
Transgrid	N/A	1800 027 253	N/A	N/A
SafeWork NSW	Lower Ground Floor 159 Auburn Street, Goulburn, NSW 2580	13 10 50	30 km	23 min
Environment Protection Authority	11 Farrer Place, Queanbeyan NSW 2620	131 55	123 km	1hr 23min
APA Gas Utility Provider	N/A	1800 676 300	N/A	N/A
Goulburn Murray Water	N/A	1800 064 184	N/A	N/A
CASA	16 Furzer Street Phillip ACT 2606	131 757	N/A	N/A
Upper Lachlan Shire Council	44 Spring Street, Crookwell NSW 2583	Office Hrs: (02)4830 1000 Out of hours: 0429 786 659	15 km	11 min
Telstra	2/217 Auburn St, Goulburn NSW 2580, Australia	13 22 03	N/A	N/A
Host Landowners		Private (GPG has these contacts)	0km	0km

Table 4. Emergency contacts

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

All personnel shall report all actual environmental incidents immediately to the Environmental Representative and/or C2WF O&M Manager (GPG) or Site Services (GE). It is the responsibility of the Environmental Representative or nominated person(s) to fully investigate the occurrence with personnel involved in accordance with the 'Accident Investigation and Reporting' in PROSAFETY.

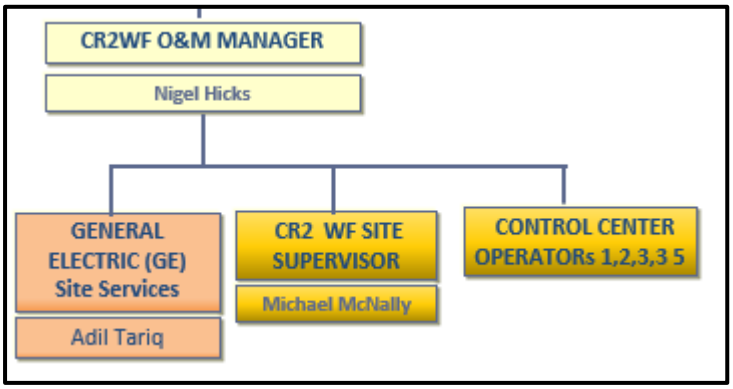


Image 2: Organization Chart

Person	Position	Phone
Nigel Hicks	C2WF O&M Manager	+61 400 560 694
Adil Tariq	GE Site Manager	+61 427 850 685
Michael McNally	CR2 Site Supervisor	+61 419 605 728
David Bone	Environmental Representative of C2WF	+61 407 461 092

Table 5. Personal phone

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

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

Project Admin and Emergency 2-Way Radio Channel is: 80

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

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

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

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

3.6. Communicating with neighbours and the local community

The external communications strategy for the C2WF is built around the following fundamental principles:

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

- Provision of a 24-hour complaints line during operation.
- Operation of a Community Consultative Committee (CCC) in accordance with condition 33 of Conditions of Consent: "33 The Applicant must operate a Community Consultative Committee for the development to the satisfaction of the Secretary, in accordance with the *Community Consultative Committee Guidelines for State Significant Project (2016),* or its latest version".
- Quarterly meetings with host landowners

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

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

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

3.6.1. Community Complaints Protocol

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

The plan aims to:

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

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

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

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

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

Complaints Register

All complaints received will be recorded on Community Complaints Form (refer over page) and also summarised in the Complaints Register. This Community Complaints Form is the input form for the

complaints register which is an Excel Database.

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

Procedure

All complaints will initially be received by the Environmental Representative. On receipt of a complaint the Environmental Representative will:

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

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

Responsibilities

The Environmental Representative will be responsible for the management of all complaints received. This includes:

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

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

3.7. Minimising Harm to Human Health

Harm to human health will be reduced utilising methods including:

- Provision of training in accordance with this PIRMP and the ERP for the project.
- Provision of hazard identification and risk control support during the operation of the windfarm, including the provision of equipment and materials necessary to reduce the identified risk.
- Provision of safety management training in accordance with the company specific safety management systems and in accordance with the Operational Management Plan (OMP) for the project.
- Ensuring that project personnel are aware of their duties under the Work Health and Safety Act 2011 with respect to their own safety and the safety of other project personnel.
- Ensure appropriately trained people are used where chemical handling is required, e.g. the use of herbicides for weed control on the project.
- Provision of Personal Protective Equipment (PPE) suited to the individual worker and the role they undertake on the project site.

- Provision of designated muster points.
- Provision of defined procedures, e.g. the provision of Safe Work Method Statements (SWMS) or Environmental Work Method Statements (EWMS), where a risk to human health is present.
- Creating a safe environment for the clean-up of the release of a pollutant to avoid the occurrence of a secondary incident during the rectification of the initial incident.

3.8. Incident Response

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

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

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

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

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

3.8.1. Spill

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

During the emergency

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

with local by-laws. Clean preferably with detergent, rather than solvent

- Deposit the products collected in airtight and isolated places/containers
- Store the materials used for cleaning the spillage as hazardous waste, in compliance with the legislation in force.

Measures to be taken after the emergency

If the spillage has flowed **onto the ground**:

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

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

- The containment barriers shall be removed when it is clear that all the spillage has been removed; these barriers shall be managed as hazardous waste.
- If it was an accident, the water quality in the course affected shall be monitored.
- If necessary, clean the banks with suitable resources (for example, skimmers or pumps that enable the spillage to be collected and transferred from the surface to a storage tank; manual collection with rakes or shovels; applying a substratum that absorbs the excess fluid, etc.)
- If the contingency has affected wild life, the species affected or that might have been affected in the area shall be rescued immediately and temporarily settled somewhere else that is free from pollution, until the species concerned can be returned to their place of origin.

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

In this case, personnel should:

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

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

3.8.3. Dangerous goods

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

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

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

Supervisor.

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

- Toxic?
- Flammable?
- Explosive?

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

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

3.9. Evacuation

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

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

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

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

3.10. Maps

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

3.11. Staff training

Training on the C2WF project site relevant to this PIRMP includes:

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

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

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

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

The objectives of training provided on this PIRMP are the:

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

requirements.
- Provision of post-incident responsibilities.

Emergency Drill: 6 monthly
During the drill, the Site Manager and HSE Advisor should observe the conduct of personnel and on completion, conduct a debriefing with all participants as a group. Any deficiencies must be identified and the plan, information and training amended as appropriate.

4. Testing and Maintenance plan

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

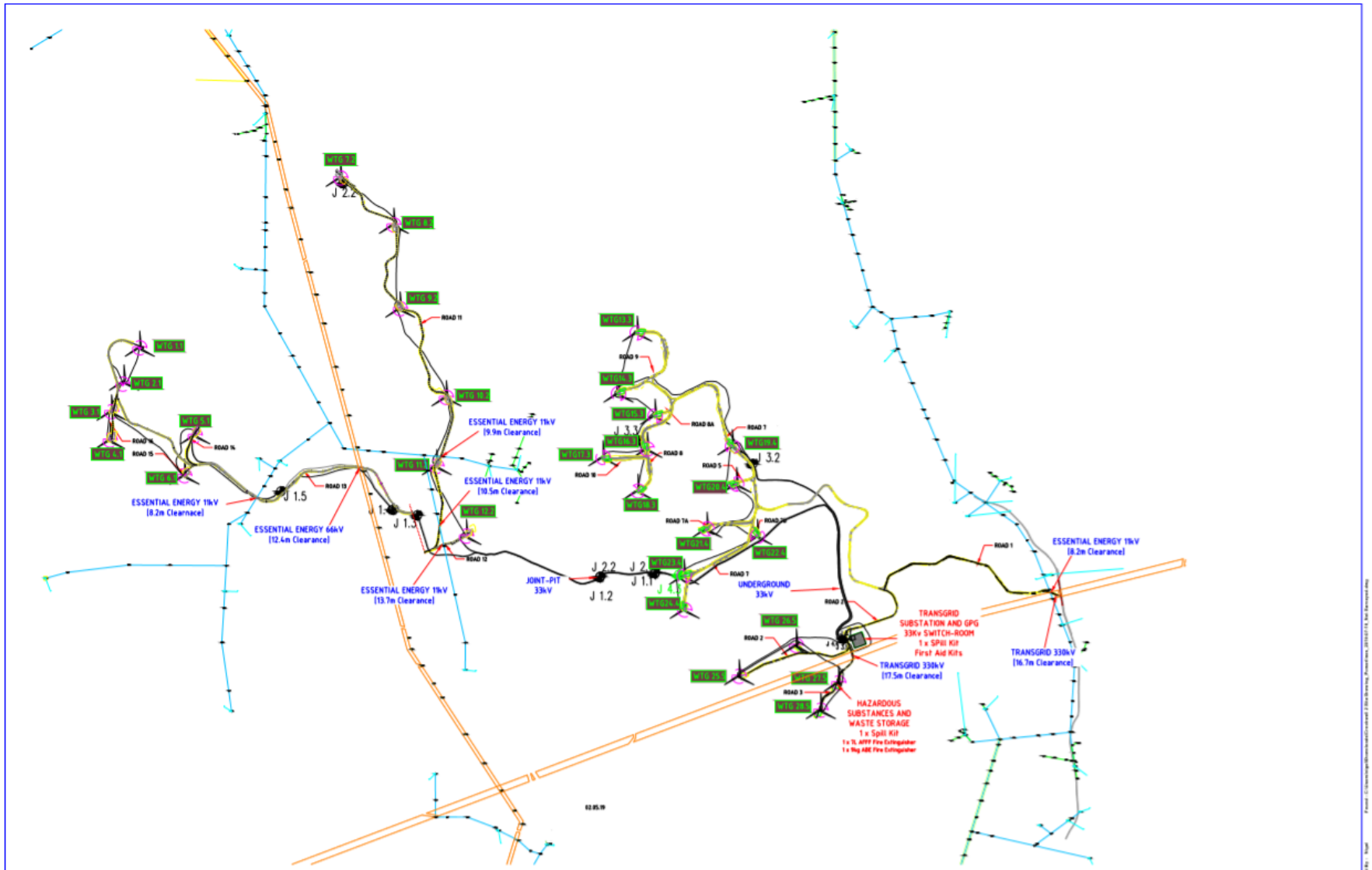
As required by section 98E testing of the PIRMP will be undertaken on the following basis:

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

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

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

Appendix 1



REVISION	DESCRIPTION	ISSUED	VERD	APPD	DATE
1	ISSUED FOR INFORMATION				02.05.19
2	Spill kits and Fire Extinguishers Added				04.02.20

DRAWING NOT TO BE USED FOR CONSTRUCTION UNLESS VERIFICATION SIGNATURE HAS BEEN ADDED

Powerline heights measured at 5°C - 17/1/19

SCALE 1:15000 @ A1

GPG
Grupo Naturgy

PROJECT
CROOKWELL II WIND FARM

A S BUILT (Not Yet Surveyed)

DRAWING TITLE
Site Infrastructure, Hazardous Substances and Emergency Resources

JOB NUMBER

DRAWING NUMBER

REVISION

DRAWING SHEET SIZE = A1