







# HSE PLAN

## Pollution Incident Response Management Plan - Kurri Kurri Lateral Pipeline Project

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## Terms and Abbreviations

Table 1: Table of Terms

Item	Definition
Contractor's CEMP	Site based management document developed by the Principal Contractor to address the requirements of the CEMP
Department	Australian Government agency responsible for administering the EPBC Act
EPBC Approval	KKLP Approval under the <i>Environment Protection &amp; Biodiversity Conservation Act</i> .
Infrastructure Approval	Kurri Kurri Lateral Project Infrastructure Approval issued under S5.19 of the <i>Environmental Planning &amp; Assessment Act 1979</i> by DPIE.
Minister	Australian Government Minister administering the EPBC Act, including any delegate thereof.
Planning Secretary	Planning Secretary under the EP&A Act, or nominee.
Principal Contractor	The Contractor engaged by APA Group, who has management and control over the construction stage of the Project, and who will plan, manage, monitor and coordinate Health Safety and Environment activities.
Project Area	The area of land that is directly impacted by a development, including access roads and areas used to store construction materials.
Secretary Approval	A written approval from the Planning Secretary and/or delegate.
Sensitive Receiver	A location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area (EPA, 2016)
Snowy Hydro	Snowy Hydro Limited.
The Project	The Kurri Kurri Lateral Pipeline Project.
Pollution Incident	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.
Material Harm	Material Harm is harm that involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000.
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Major Pollution Incident	Spills of hazardous substances whereby immediate clean up and removal of substance and/or affected soils cannot be undertaken which may result in impacts to a land or water surface area indicating the potential for leaching to groundwater and or offsite transport in meaningful quantities that is likely or has resulted in Environmental Harm.

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## 1. Introduction

### 1.1 Context

This Pollution Incident Response Management Plan (PIRMP) describes the requirements and associated responsibilities to effectively prevent, prepare for, respond to and recover from any spill and emergency situation resulting from works associated with construction of the Kurri Kurri Lateral Pipeline Project (KKLP or the Project) at the former Hydro Aluminium Kurri Kurri Pty Ltd (Hydro) aluminium smelter.

Snowy Hydro Limited (Snowy Hydro) holds an Environmental Protection Licence (EPL) for the site with the NSW Environment Protection Authority (EPA) (EPL 21627), for the Hunter Power Project. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an EPL must prepare, keep, test and implement a PIRMP that complies with part 5.7A of the POEO Act in relation to the activity to which the licence relates.

As construction of the KKLP involves work which will be undertaken on this premises, this PIRMP to meet the requirements of the Snowy Hydro EPL (21627).

### 1.2 Purpose

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, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of this plan must also be available either on a publicly accessible website, or if there is no website, by providing a copy of this plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the *Protection of the Environment Operations (General) Regulation 2022*.

### 1.3 Document Scope

This PIRMP has been developed to address construction works which will occur as part of the KKLP, including establishment of a line pipe laydown area, construction laydown area, and construction of the compressor station and delivery station as shown in Figure 1, within the premises boundary of the Hunter Power Station, to which EPL 21627 applies (Lot 3B and Lot 1) here in refer to as the "Project Area".

Table 2 outlines where the requirements of Section 153C of the POEO Act, and 72 of the POEO Regulation (General) 2022 relating to information to be included, are addressed within this PIRMP.

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## Pollution Incident Response Management Plan - Kurri Kurri Lateral Pipeline Project



**Table 2: POEO Act and Regulation PIRMP Information Requirements**

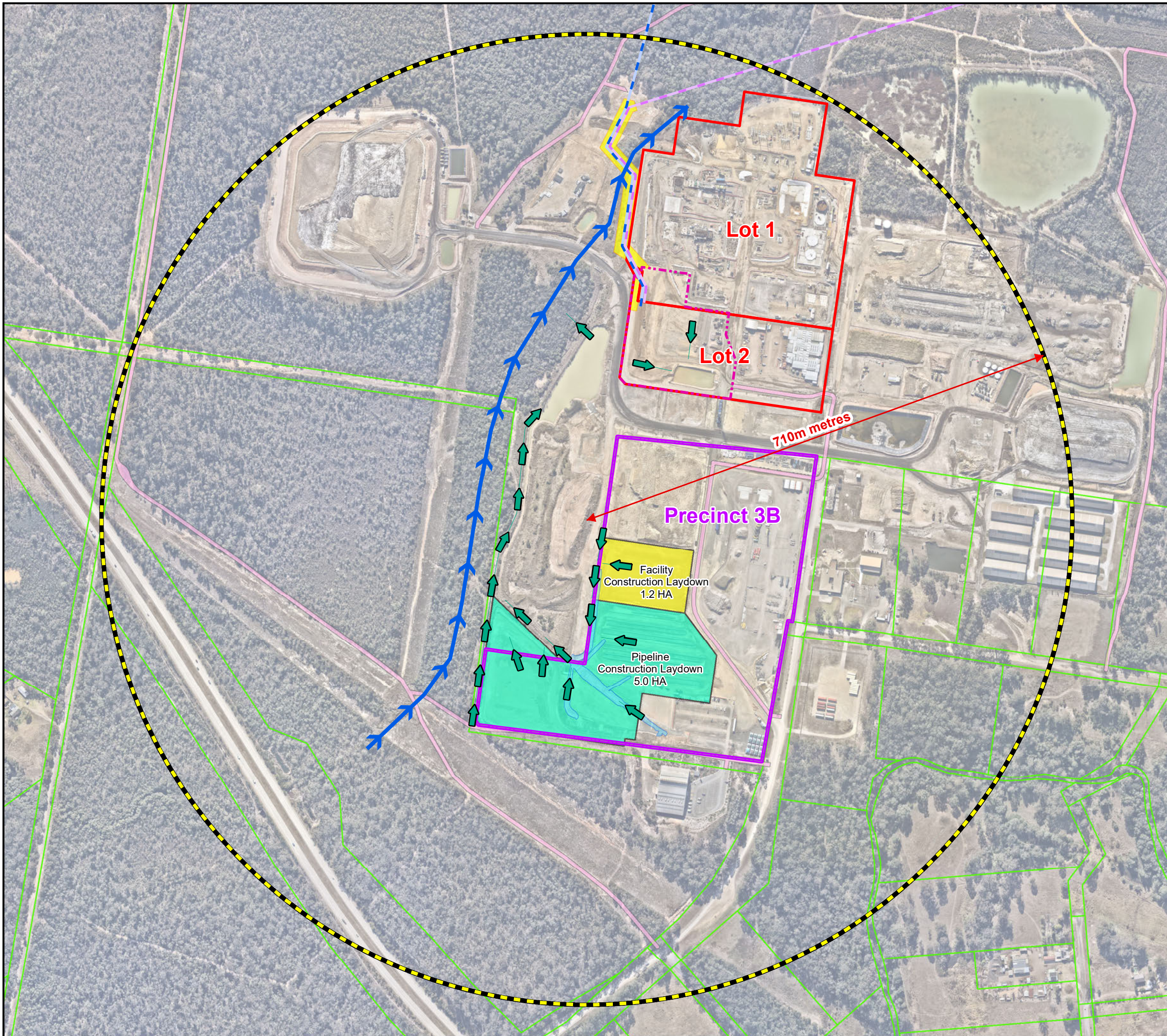
Section	PIRMP Reference
<b>Pollution of the Environment Operations Act 1997</b>	
<p>153C Information to be included in plan A pollution incident response management plan must be in the form required by the regulations and must include the following –</p> <p>(a) The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to –</p> <p>(i) 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</p> <p>(ii) 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</p> <p>(iii) Any persons or authorities required to be notified by Part 5.7</p>	Section 3.5
<p>(b) 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,</p>	Section 4
<p>(c) 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,</p>	Section 3.4
<p>(d) Any other matter required by the regulations.</p>	See below
<b>Pollution of the Environment (General) Regulation 2022</b>	
<p>72 – General licences – additional matters to be included in the PIRMP – the Act 153C For the Act, Section 153C(d), the following matters must be included in a PIPMP plan –</p> <p>(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the <i>relevant activity</i>),</p> <p>(b) The likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,</p>	Section 2.4
<p>(c) details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of the relevant activity,</p>	Section 3.1
<p>(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,</p>	Section 3.2
<p>(e) the maximum quantity of a pollutant likely to be stored or held at particular locations, including underground tanks, at or on the premises to which the licence relates,</p>	Appendix 1

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<p>(f) a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident,</p>	<p>Section 3.3</p>
<p>(g) the names, positions and 24-hour contact details of individuals who—</p> <ul style="list-style-type: none"> <li>(i) are responsible for activating the PIRMP plan, and</li> <li>(ii) are authorised to notify relevant authorities under the Act, section 148, and</li> <li>(iii) are responsible for managing the response to a pollution incident,</li> </ul> <p>(h) the contact details of each relevant authority referred to in the Act, section 148,</p>	<p>Section 3.5.2</p>
<ul style="list-style-type: none"> <li>(i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near the premises to which the licence relates or where the scheduled activity is carried on,</li> <li>(j) the arrangements for minimising the risk of harm to persons who are on the premises or who are present where the scheduled activity is being carried on,</li> </ul>	<p>Section 4</p>
<p>(k) a detailed map, or set of maps, showing the location of the premises to which the licence relates, the surrounding area likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of stormwater drains on the premises,</p>	<p>Section 1.3 Section 2.3</p>
<p>(l) a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,</p>	<p>Section 3 Section 4</p>
<p>(m) the nature and objectives of a staff training program in relation to the PIRM plan,</p>	<p>Section 4.2</p>
<ul style="list-style-type: none"> <li>(n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,</li> <li>(o) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,</li> <li>(p) the way in which the PIRM plan must be tested and maintained.</li> </ul>	<p>Section 4.3</p>



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**PROJECT:** KURRI KURRI LATERAL PIPELINE

**TITLE:** Pollution Incident Zone of Influence

**SUBTITLE:** Revision 07

**DATE:** 19/09/2023

**DATA SOURCE:**  
 DCDB/ Roads: PSMA,  
 Imagery: Nearmap 2023

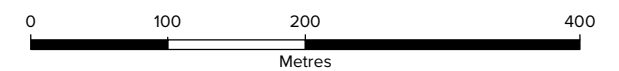
**LEGEND:**

- Facility Construction Laydown Area - 1.237ha
- Pipeline Construction Laydown Area - 4.963ha
- Potential Flooding Zone - 0.363ha
- Stormwater Flow Direction
- Unnamed Creek Flow Direction
- 710m Likely Pollution Incident Impact Zone
- KPSS Footprint
- Revision 07 Interconnector/HDD
- Revision 07 Lateral
- Access Track
- Cadastral Boundary

**DOCUMENT NUMBER:** KUR.2373-MAP-L-0050\_7\_IFU

Revision	Issued for Use Description	ML Drawn	MB Checked/QC	WP Approved	19/09/23 Date
07					

**SCALE:** 1:5,500 @ A3



Coordinate System: GDA2020 MGA Zone 56

**LOCATION DIAGRAM**



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## 2. Project Description

### 2.1 Project Overview

Snowy Hydro is developing a gas-fired peaking power station, referred to as the Hunter Power Project (HPP), at the site of the former Hydro Australia Pty Ltd (Hydro) aluminium smelter at Kurri Kurri.

APA Transmission Pty Ltd, a wholly owned subsidiary of APA, has been engaged by Snowy Hydro to develop a gas supply for the HPP.

The KKLK involves the construction, operation and maintenance of a medium pressure transmission pipeline, compressor station, high pressure storage pipeline, delivery station, and other ancillary surface facilities.

The Project, as presented in the KKLK Environmental Impact Statement (EIS), comprises the following primary components:

- A buried, steel, medium diameter (outer diameter of 355.6 mm), medium pressure (up to 6.9 megapascal (MPag)) transmission pipeline of approximately 20.1 km in length to provide a gas supply from the existing Sydney to Newcastle Pipeline (SNP), via offtake and delivery facilities, to the HPP site;
- A compressor station at the termination of the transmission pipeline to boost gas pressure prior to transfer to a storage pipeline;
- A buried, steel, medium diameter (outer diameter of 355.6 mm), high pressure (up to 15.3 Mpag) interconnect pipeline of approximately 1.3 km in total length, providing an interface between the compressor station, storage pipeline and delivery station;
- A buried, steel, large diameter (outer diameter of 1067mm), high pressure (up to 15.3 Mpag) storage pipeline of approximately 24 km in total length downstream of the compressor station with approximately 70 terajoules (TJ) of useable gas storage ready to supply the HPP; and
- A delivery station to receive gas from the storage pipeline and control temperature, pressure and flow rate prior to delivery of gas to the HPP.

The Planning approval (Infrastructure Approval SSI-22338205) and related environmental assessment documents are located at: <https://pp.planningportal.nsw.gov.au/major-projects/projects/kurri-kurri-lateral-pipeline-project3>

### 2.2 Existing Environment

The Project area is located on industrial land used for the former Kurri Kurri aluminium smelter between 1969 and 2014.

Remediation of the former Kurri Kurri aluminium smelter is being undertaken by Hydro Aluminium Kurri Kurri Pty Ltd in accordance with approvals granted under State Significant Development SSD-6666. The remediation entails excavation of hazardous wastes from the site and placement in a purpose-built containment cell immediately west of the former smelter site. Remediation work is likely to be ongoing during construction activities.



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Remediation works have been undertaken in the vicinity of the Project area, with the removal of building structures etc. The Project area is located with the intention of avoiding impacts to ongoing remediation activities on the site.

## 2.3 Scope of Works

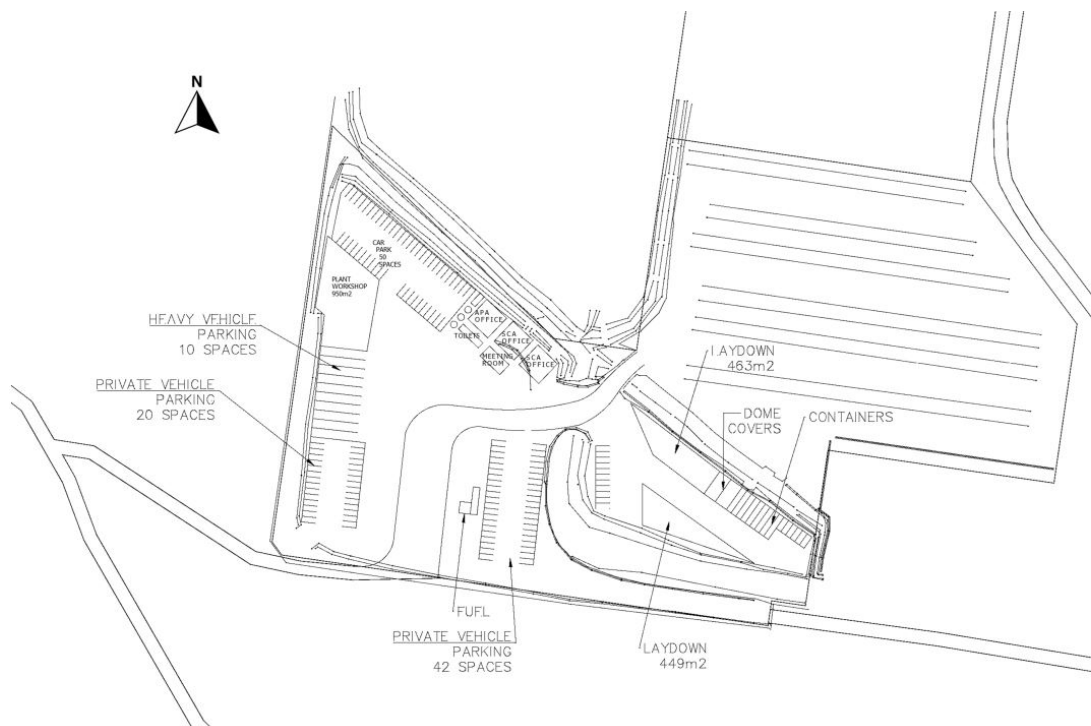
APA has engaged Spiecapag and Alltype Engineering to undertake construction works described in Section 2.1 Project Overview within the Project area, as described below.

### Spiecapag

Spiecapag (SCA) are the principal contractor tasked to construct the pipeline transmission component of KKPL works. The SCA laydown site will comprise an approximately 5 hectare for construction equipment laydown and DN 1050 line pipe storage for the storage pipeline allocated over the majority southern portion of Lot 3B (See Figure 1 & 2.)

Major plant and equipment to be utilised will typically include

- 1 x Mobile Bulk fuel tankers 8,000L and 1 x 90,000 L Bulk fuel pod;
- Sea containers – Tools, chemical stores, warehousing, dome shelter;
- Site Offices;
- Construction Machinery and Equipment;
- Site Crib Room;
- Ablution Block and Portaloo;
- Generators;
- Skip and Waste Bins



**Figure 2. SCA Snowy Hydro DN1050 Site Office and Laydown Area**

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#### All Type Engineering

Alltype Engineering (AE) are the principal contractor tasked to construct the facility component of KKPL works, namely a Compressor and Delivery Station located adjacent to the Hunter Power Station. The KKSS compresses gas from the KKLP and stores it in the KKSP. The KKSS receives gas from the KKSP to meter and regulate into the Hunter Power Station. It is noted the northern extent of the KKSS construction footprint fall over Lot 1 shown in Figure 1. The Alltype Engineering laydown site will comprise an approximately 1 hectare for construction laydown and storage of equipment over Lot 3B. Major plant and equipment to be utilised in this area will typically include:

- 1 X 1000L Fuel Trailer and self-bunded bulk fuel pod (4500L);
- Sea containers – Tools, chemical stores, warehousing, dome shelter;
- Site Offices;
- Construction Machinery and Equipment;
- Site Crib Room;
- Ablution Block and Portaloo;
- Generators;
- Skip and Waste Bins;

## 2.4 Description and Likelihood of Hazards

The Pollution Incident main hazard associated within the Project Area includes two unlikely scenarios:

- Discharge of heavily laden sediment waters;
- Liquid Chemical spill

The key risk is that polluted surface run-off or a liquid chemical spill on site may enter the unnamed waterway on the western side of the site. The site's stormwater flow and/or pollution incident's direction running off Lot 3B ultimate feeds water storage dam/sediment adjacent to the KKSS shown in Figure 1 above. The overflow from this basin runs via spillway into unnamed creek to the west. The stormwater flows and or potential pollution incident associated with Lot 1 would be captured by the site sediment basin on Lot 2. This total stormwater catchment basin is managed by pumping to an off project area site basin for further treatment and disposal via field irrigation. The Project Area's stormwater and watercourse flows and "likely impact zone" is best illustrated in Figure 1 above.

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Credible pollution event scenarios including an assessment of the likely risk, are described in Table 3.

**Table 3: Pollution Event Scenarios**

Spill Scenario	Quantity (approx.)	Cause	Contamination Risk
Release of diesel from jerry can	≤20L	Not following procedures – storage outside of bunded area or bund not maintained, handling outside bunded area without drip tray, integrity failure	Minor, very localised soil contamination, no ground/surface water impacts
Release of oily water and/or diluted cleaning chemicals	50 L	Overspray during wash down of static machinery	Extremely localised soil contamination
Uncontrolled release of hazardous substance stored in individual containers of 50 L	50 L	Spill during storage and/or handling: container leak	Extremely localised soil contamination assuming bunds in place
Release of oil, coolant, or diesel direct from machinery and/or equipment	<50 L	Integrity failure (i.e. compressors, GEA's, pipework etc)	Localised soil contamination
Release of diesel from fuel pod/mobile tanker storage and during refuelling operation.	<1000 L	Spills from refuelling hose failure, integrity failure, Collision with fuel pod/tanker.	Localised soil contamination. Potential for surface water contamination if incident occurred adjacent to stormwater drainage.
Uncontrolled release of hazardous substance stored in individual drums of 205 L	205 L	Spill during storage and/or handling: container leak	Localised soil contamination assuming bunds in place.
Release of oil	<500 L	Transfer from tanks to trucks for removal from site i.e. from fittings and/or hoses OR as a result of leakage from pipework	Localised soil contamination. Potential for surface water contamination if incident occurred adjacent to stormwater drainage.
Chemical spill during transport	< 1000 L	Vehicle accident	Localised soil contamination. Potential for surface water contamination is incident occurred adjacent to water body.

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# 3. Pollution Incident Response Controls

## 3.1 Pre-emptive Actions to be Taken

All liquid chemicals and hazardous materials used on site will be handled and stored within bunded areas that are constructed and maintained in accordance with:

- Any relevant Australian Standards for the materials being stored
- Within a bunded area with a bund capacity of 110% of the largest vessel stored within the bund
- The Storing and Handling of Liquids: Environmental Protection Participants Manual (DECC, 2007), and
- Where any conflict exists between these requirements, the most stringent requirements apply.

Other pre-emptive actions will include:

- Refuelling of vehicles and machinery, other than hand held machinery, will utilise auto shut off valves. Refuelling of vehicles and mobile machinery will not occur within 50 m of a watercourse. Regular inspections of work areas;
- Routine visual monitoring and recording of chemical and fuel storage facilities
- Pre/post rainfall inspections
- Spill kits will be kept in close proximity;
- Vehicles/plant/machinery/equipment will be maintained in good condition to minimise the potential for leaks/spills to occur.
- Vehicle and equipment will be inspected daily to check for oil, lubricant or fuel leaks and general wear and tear of hoses.
- High level alarms set at 75% of capacity installed on sewage tanks.
- Surface Water Management Plan and Erosion and Sediment Control planning in accordance with the SHL HPP Water Management Plan.
- Bunding and where required ventilated Hazard material storage containers and cabinets.
- Apply the waste management hierarchy with respect to liquid waste and ensure appropriately separate, segregate and label wastes in appropriate covered containers which are regularly emptied.

## 3.2 Inventory of Pollutants

An inventory of pollutants that may be held on site is provided in Appendix 1. This register will be maintained, with hard copies of the inventory and Safety Data Sheets (SDSs) for each of the pollutants kept on site at the location of the chemical and the site office.

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### 3.3 Safety Equipment

The following safety equipment will be kept on site in a readily accessible location:

- Fire extinguishers;
- Fully stocked spill kits;
- Hazard material storage containers;
- Chemical bunds;
- Waste storage facilities;
- Absorbent floor sweep;
- PVC water fence boom; and
- Erosion and sediment control consumables (geotextile, sediment fence, coir logs etc).

Additional materials will be procured as required.

### 3.4 Minimising Harm

All personnel will be briefed on the location of spill kits and safety equipment, and emergency procedures. Appropriate Personal Protective Equipment (PPE) will be provided to ensure that personnel are not required to come into contact with chemicals as per the SDS's specifications.

Refer to:

- APA Emergency Response Plan KKPL 21 159-PL-HSE-001
- APA Health and Safety Management Plan 21 159-PL-HSE-0001
- APA HSE EP 13.04.01 Spill Preparation and Response

### 3.5 Notification and Communication

#### 3.5.1 Notifications

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm is defined in section 147 of the POEO Act as:

- a) Harm to the environment is material if:
  - i. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - ii. It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.'

Notification is required even where 'harm to the environment' is caused only in the premises where the pollution incident occurs.

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Firstly, in the event of an incident, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance are the first responders as they are responsible for controlling and containing incidents.

#### 3.5.2 Parties to Notify

If the incident does not require an initial combat agency, or once the 000 call has been made, and the incident is likely or has caused Material Harm, the Project's APA Representative or his representative will contact and notify relevant authorities and owner/occupiers of premises in the vicinity of the premises. The Project's APA representative will report the incident immediately (i.e. promptly and without delay) to the parties as described in Table 4.

**Table 4: Parties to Notify**

Name	Contact Details
<b>Authority</b>	
NSW EPA	131 555
NSW Health	02 4924 6477
SafeWork NSW	13 10 50
Cessnock City Council	02 4993 4100
Fire and Rescue NSW / Rural Fire Service	1300 729 579*
NSW Department of Planning and Environment	02 4904 2700
NSW Office of Water	1300 662 077
Department of Climate Change, Energy, the Environment and Water	1800 920 528
<b>Owner/occupier</b>	
ReGrowth	1800 066 243
Hydro Aluminium Kurri Kurri Pty Ltd	02 4937 1555
Daracon	02 4951 1070

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

As the holders of the EPL, Snowy Hydro will be immediately contacted in the event of an incident. Contact details for Snowy Hydro and site Project Management personnel is provided in Table 5.

**Table 5: Site Project Management – Contact Details**

Role	Name	Contact Details
<b>Snowy Hydro</b>		
Construction Director	[REDACTED]	[REDACTED]
Safety and Assurance Officer	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
HSE Lead	[REDACTED]	[REDACTED]
Environmental Assurance Advisor	[REDACTED]	[REDACTED]
<b>APA Group</b>		

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Project Manager	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
Senior Project Engineer	[REDACTED]	[REDACTED]
Senior Project Engineer	[REDACTED]	[REDACTED]
ID HSE Manager	[REDACTED]	[REDACTED]
HS Advisor	[REDACTED]	[REDACTED]
HS Advisor	[REDACTED]	[REDACTED]
Site Environmental Stakeholder Advisor and	[REDACTED]	[REDACTED]
<b>Spiecapag</b>		
Project Manager	[REDACTED]	[REDACTED]
Deputy Project Manager	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
Project HSE Manager	[REDACTED]	[REDACTED]
Project Env Manager	[REDACTED]	[REDACTED]
<b>AllType Engineering</b>		
Project Manager	[REDACTED]	[REDACTED]
Construction Manager	[REDACTED]	[REDACTED]
HSE Advisor	[REDACTED]	[REDACTED]
HSEQ Manager	[REDACTED]	[REDACTED]

The following site contacts (Table 6) are key individuals who have the responsibility of activating this PIRMP and are authorised to notify relevant authorities as listed under section 148 of the POEO Act.

**Table 6: Pollution Incident Responsibilities**

Pollution Incident – Person/s Responsible	
PIRMP Activation	<p><b>Primary Contact:</b>                      Name: [REDACTED]                      Position or title: APA Project Representative                      Contact number/s: [REDACTED]                      Email: [REDACTED]</p> <p><b>Secondary Contact:</b>                      Name: [REDACTED]                      Position or title: Construction Manager                      Contact number/s: [REDACTED]                      Email: [REDACTED]</p>
Notifying relevant authorities	<p>Name: [REDACTED]                      Position or title: Access and Approval Manager</p>

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	Contact number/s: [REDACTED] Email: [REDACTED]
Managing response to pollution incident	Name: [REDACTED] Position or title: Site Environmental and Stakeholder Advisor Contact number/s: [REDACTED] Email: [REDACTED]

### 3.5.3 Communication with Neighbours and the Local Community

As shown in the likely zone of influence the site is not located in close proximity to the nearest community, the likelihood of a pollution event impacting the surrounding community or industries is negligible. It does however have the potential to impact the neighbouring ReGrowth Stewardship sites and Hydro Aluminium, who have been identified in Table 3 as a key party to notify. Should an event occur that has the potential to impact the closest dwelling, they will be formally advised. Communication with neighbours and the nearby community will be wholly managed by the Site Environment and Stakeholder Advisor in line with the APA Construction Stakeholder Management Plan (21159-PL-LH-0003).



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# 4. Incident and Emergency Management

## 4.1 Incident Response

APA employ an internal Spill Preparation and Response Procedure (HSE EP 13.04.01) which applies to all activities at all APA sites, conducted by APA employees, contractors and sub-contractors within APA's operational control and describes APA's processes and requirements for preparing for, and responding to, spills of hazardous substances (Appendix 2) as summarised in Figure 3 below.

In the event of Major Pollution event, all emergency response protocols shall follow those outlined in APA Emergency Response Plan KKPL 21159-PL-HSE-001 as summarised in Figure 4. This outlines the general procedure to be followed in case of an environmental incident onsite. More detailed internal APA procedural emergency response information can be found in Appendix 3. Further notification protocols and reporting requirements can be found in the KKPL Project's Construction Environmental Management Plan CEMP 21159-PL-HSE-0012.

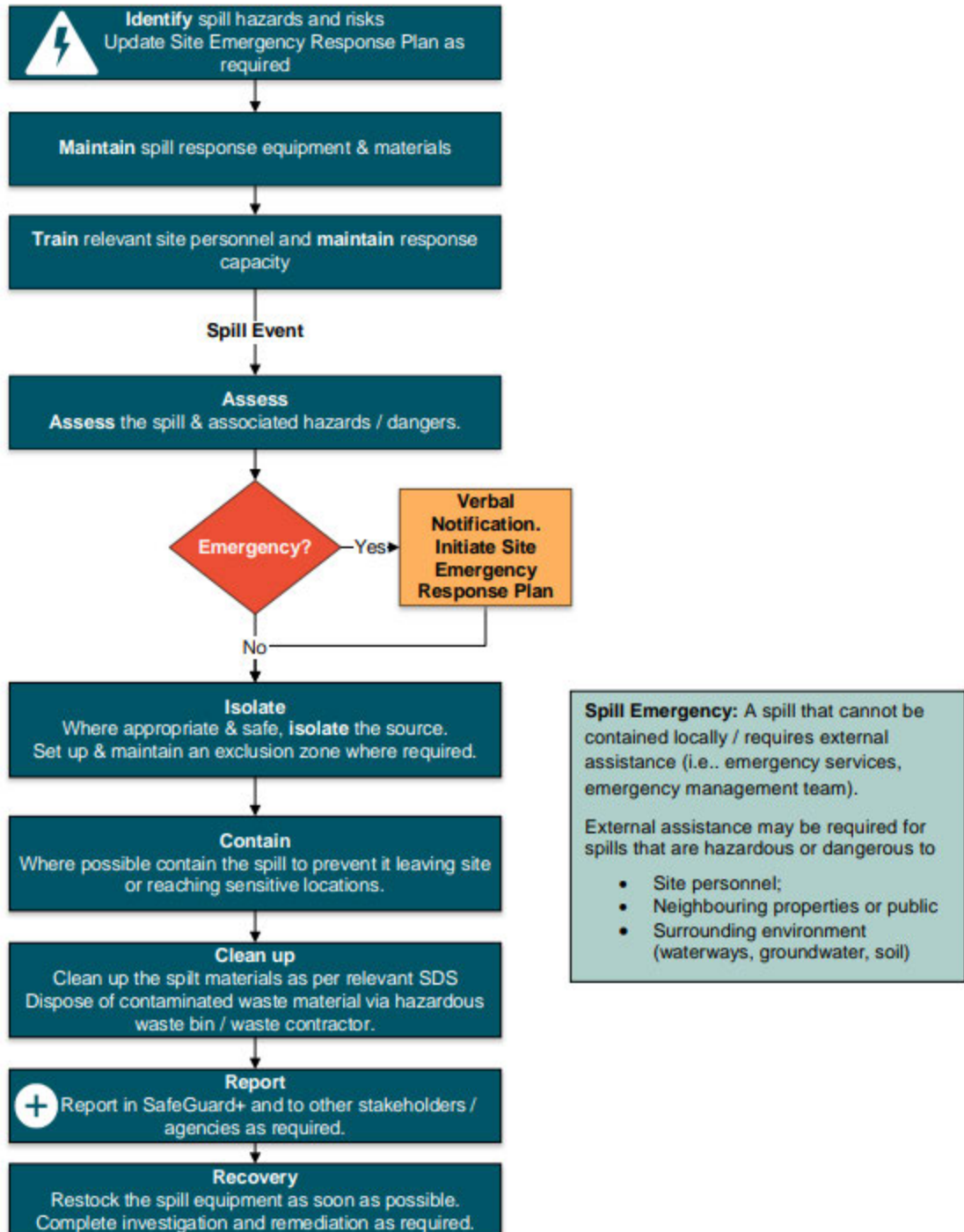
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## Spill Preparation and Response Flowchart

*This guide has been created to support implementation of the Spill Preparation and Response Procedure and does not form part of the audit criteria.*



**Figure 3. Spill Preparation and Response Flowchart**

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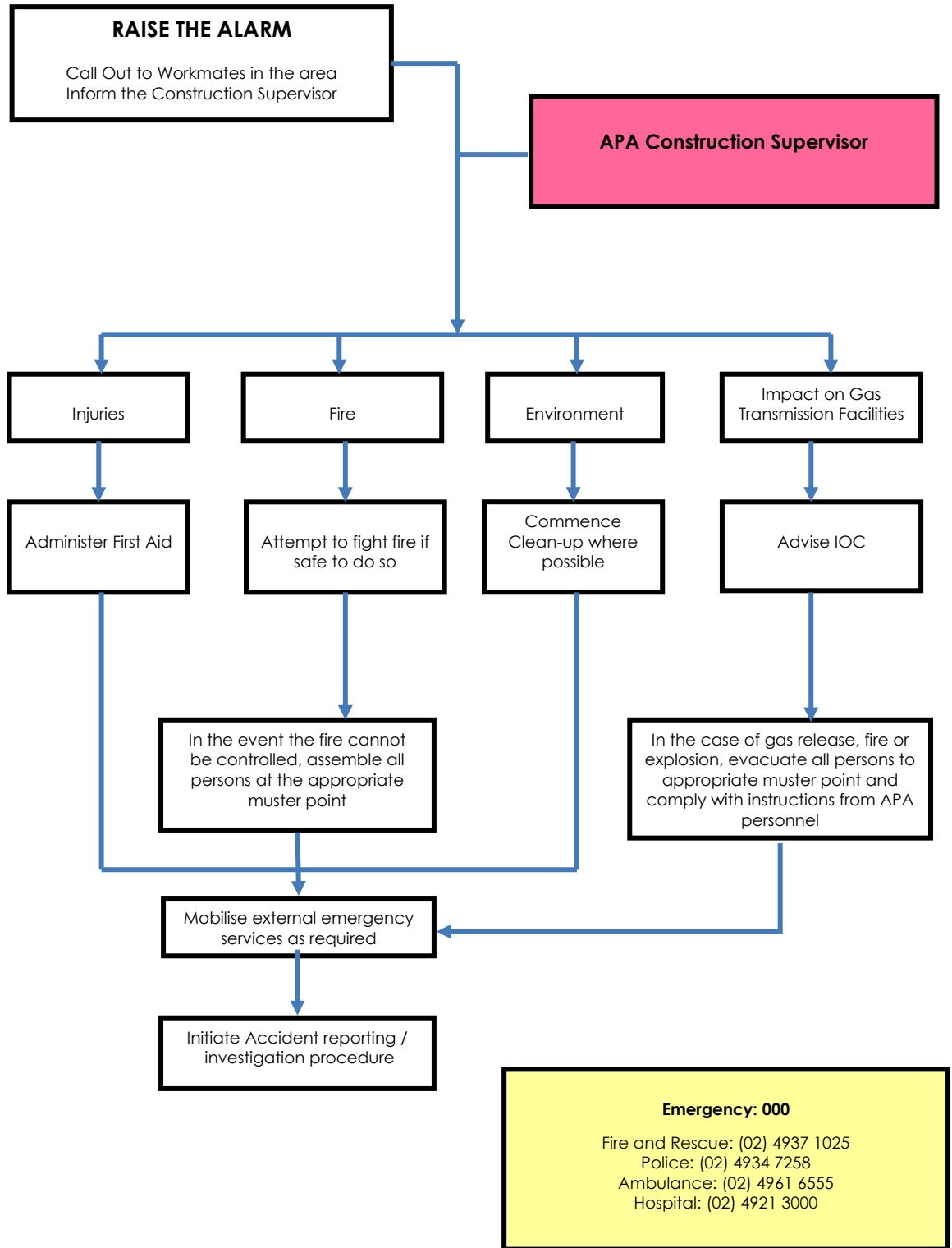


Figure 4. Environmental Incident Response Flowchart

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### 4.2 Staff Training

All personnel, including Subcontractors, working on site shall be informed of the general requirements of this PIRMP through inductions and toolbox talks. Training will be repeated annually after each material update to this plan. In the event of an incident requiring the PIRMP to be activated a training drill shall be carried out within one month of the incident occurring and shall include any updates to the PIRMP.

### 4.3 Testing and Updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

The PIRMP will be tested annually and also within 1 month of any pollution incident causing or threatening material harm to the environment. Aspects of the PIRMP that will be evaluated may include response times in initiating the requirements of the PIRMP, effectiveness of emergency equipment and communications and response to injury. The review will also consist of assessment of any additional hazards and control measures.

The PIRMP will be reviewed at the conclusion of each test and may be updated to reflect the findings.

Testing and updates to the PIRMP will be recorded in Table 7 and Table 8 respectively.

**Table 7: PIRMP Testing Details**

Date	Tested By	Details of Test	Findings	Next Scheduled Test Date

**Table 8: PIRMP Update Details**

Date	Reason for Update	Details of Update	Revision uploaded to website (date)	Date of Completion

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**Table 9: Internal APA Emergency Contact Details**

Contact Name	Contact Details
Transmission IOC (After hours response)	1300 087 621 1800 017 000
Infrastructure Protection	1800 103 452
Head of Corporate Communications – external enquiries	[REDACTED] and [REDACTED]
APA Communications – internal	communication@apa.com.au

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## APPENDIX 1 - INVENTORY OF POLLUTANTS

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### Inventory of Pollutants on Lot 3B – SCA and AE Laydown

Source	Max. Quantity	Unit	Contents	Comments
Refuelling Fuel Pod	4500 L		Diesel	Fuel Pod
Refuelling Fuel Pod	90000 L		Diesel	Fuel Pod
Mobile Bulk Fuel Truck	6000 L		Diesel	Mobile Fuel Pod
Fuel Trailer	1000 L		Diesel	Mobile Fuel Pod
Minor fuel sources	100 L (max.)		Diesel	Jerry can (transportable), small generators
Minor lubricants and oils	208 L (drum)		Oil	Drums located in Bunded Haz Material Area
Toilets	5000 L		Sewage waste	High level alarms set at 75% of capacity installed on tanks. Alarm is visual and audible and checked daily.
Other Sealant Extinguishers (Powder and Foams)	20L/9kg		Sealants, Foams	Used in Maintenance and for Emergency Response (Fire)
Solvents/Paints Coating	208L (Drum)/ 20-50L containers		Paints Coating, Solvents	Drums located in Bunded Haz Material Area - Used for line pipe coating and Cathodic Protection.

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# APPENDIX 2 - SPILL PREPARATION AND RESPONSE PROCEDURE



# APA HSE EP 13.04.01

## Spill Preparation and Response

Document type	<b>Procedure</b>
Effective from	12/12/2022
Key contact	Manager, Environment and Heritage
Document owner	Manager, Environment and Heritage
Approved by	General Manager Health, Safety, Environment and Heritage
Approved date	09/12/2022
Next review date	09/12/2025
Review cycles	3 Yearly
Related Group Standard/Policy	<a href="#">Spill Management and Contamination Standard</a>

## 1 Scope

This procedure describes APA's processes and requirements for preparing for, and responding to, spills of hazardous substances.

This procedure applies to all activities at all APA sites, conducted by APA employees, contractors and sub-contractors within APA's operational control, in all jurisdictions.

This procedure does not address the following:

- Occupational health and safety considerations;
- Chemical storage, handling or transport (refer to [APA HSE PRO 005 Chemical Management](#));
- Natural gas releases or emissions;
- Consumer products as per [APA HSE PRO 005 Chemical Management](#).

## 2 Controls

### 2.1 Spill Response - Planning and Preparation

13.04.0101

Spill hazards and associated spill response requirements must be risk assessed in accordance with APA HSE GP 06.01 Risk Management Overview, 2.3 Risk Assessments.

#### Examples of Evidence

- Chemical Risk Assessment
- Job Hazard Analysis / Safe Work Method Statement
- Site / Project Risk Assessment
- Environmental Management Plan / Environmental Risk Assessment

13.04.0102

Adequate first response spill materials and equipment must be available for the spill hazards and risks associated with a particular location or task.

#### Examples of Evidence

- Spill Equipment Register
- Job Hazard Analysis

13.04.0103

Spill response material and equipment must be regularly inspected and maintained in working order.

#### Examples of Evidence

- Record of spill kit inspection – eg completed work order, Spill Kit Inspection Checklist.

13.04.0104

Where relevant a manifest of dangerous goods and hazardous chemicals must be prepared and available for emergency responses.

#### Examples of Evidence

- Manifest prepared in accordance with the WHS Regulations and Code of Practice for Managing risks of hazardous chemicals in the workplace.

13.04.0105 Potential spill emergencies must be included in relevant site emergency response plans and associated emergency response drills.

**Examples of Evidence**

- Site / Project Emergency Response Plan
- Emergency response drill completion records

13.04.0106 Workers who are responsible for spill response must be suitably trained.

**Examples of Evidence**

- Training records

## 2.2 Spill Response

13.04.0107 Spill events must be managed in accordance with APA's incident / event management protocol (APA HSE GP 07.01).

**Examples of Evidence**

- Incident / event report or investigation.
- Completed Spill Response Checklist

13.04.0108 In the event of a spill, the following response measures must be implemented where safe to do so:

- Assess the spill and associated hazards. Verbally report to supervisor and appropriate control room where required. Escalate and engage additional resources and emergency agencies as required.
- Where safe to do so, isolate the source of the spill and deploy containment measures to prevent the spread of the release.
- Once safe to do so, clean up and / or remediate the spill.
- Complete investigation and reporting requirements and resume normal operations once safe to do so.

**Examples of Evidence**

- Incident / event report or investigation
- Completed Spill Response Checklist

13.04.0109 Where required, spill events must be reported to the relevant regulator, within the regulatory reporting timeframes.

**Examples of Evidence**

- Incident report or investigation.
- Copy of correspondence attached to incident

### 3 Supporting Material

Reference	Name
13.04.01 T1	<a href="#">Spill Preparation and Response Flowchart</a>
13.04.01 T2	<a href="#">Spill Preparation and Response Guideline</a>
13.04.01 T3	<a href="#">Spill Response Site Poster</a>
13.04.01 T4	<a href="#">Spill Equipment Register</a>
13.04.01 T5	<a href="#">Spill Kit Inspection Checklist</a>
13.04.01 T6	<a href="#">Spill Response Checklist</a>
13.04.01 T7	<a href="#">Toolbox Talk Spill Preparation &amp; Response</a>
13.04.01 T8	<a href="#">Spill Response Audit and Self-Assessment</a>

### 4 Definitions

Term	Definition
Activities / activity	A field based task carried out for APA by an APA employee, contractor or sub-contractor.
Hazardous Substance / Hazardous Chemical	<p>A substance which, because of its chemical, physical or biological properties has the potential to cause harm to a person's health or safety or the environment.</p> <p>May be a finished product, intermediate product, raw material or chemical waste produced or handled by APA.</p> <p><b>Note:</b> The definition of a hazardous substance may be different under WHS and Environmental legislation.</p>
Manifest	A document that provides Emergency Services with information about the quantity, type and location of materials stored and handled on the premises. This enables them to respond appropriately if called to an incident. A manifest is different to a register. Details of substances and quantities and other manifest requirements are defined in WHS regulations. Refer to the Code of Practice for Managing risks of hazardous chemicals in the workplace (Safework Australia)
May	Means that the action(s) are optional.
Must	Means the action is mandatory
Regulated waste	Waste subject to specific state/territory government regulation under environmental law. Depending on the jurisdiction, regulated waste is also referred to as 'controlled waste', 'prescribed waste', 'hazardous waste' or 'trackable waste'. The classification of regulated waste varies across jurisdictions.

Risk assessment and Environmental Risk Assessment	The APA risk assessment process is described in <a href="#">APA HSE GP 06.01 HSE Risk Management Overview</a> and <a href="#">APA HSE GP 13.01 Environmental Management</a>
Safety Data Sheet (SDS)	Describes the appropriate requirements for use, handling, storage and spill response for a certain fuel or chemical, including potential impacts to the health and safety of people and the environment and measures to avoid impacts.
Spill	An event where a liquid or other substance, becomes uncontained and poses a hazard or danger to the environment (soil, flora, water) and / or people.

## 5 Version Control

Version	Date	Summary of Changes
1.02	04/06/18	Minor wording changes and formatting (esp. s5.5; 5.6 inclusion of ALARP principle in spill response)
2.0	12/12/2022	Major revision of controls and supporting materials as part of Environment Procedure Improvement Program, Initiative 5.1 HSEH Strategy (FY23-27).





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**APPENDIX 3 - EMERGENCY RESPONSE**

