HSE - Health, Safety & Environment

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN CENTRAL PARK

PLN - Plan

HSE-PLN-0003

Contents

1 Introduction

CPE Central Park Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Central Park CTP & Trigen Facility. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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 is kept at CPE Central Park licensed premises and is made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

This plan is also made available on CPE Central Park's publicly accessible website https://cleanpeakcentralpark.com.au/environmental/, as required in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

This plan has been developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.

CPE Central Park Pty Ltd is a subsidiary of CleanPeak Energy Pty Ltd, and as such some of the provisions mentioned on this Plan are originated and managed in accordance with companywide CleanPeak Energy provisions.

2 Purpose

The purpose of this plan is to outline the specific processes for management of pollution incidents at the licensed premises at CPE Central Park.

The plan provides a guide for the operations, actions and notifications to be carried out in the event of a pollution incident and/or emergency as applicable. Whilst deviation from the plan should be avoided, all events shall be managed according to the specific incident conditions.

This document outlines the risk management processes implemented at CPE Central Park and the activities that produce pollution associated with the operation of the CleanPeak Energy tri-generation plants. All risks and any subsequent pollution incidents however would be managed through the implementation of this plan. This document also details the pre-emptive actions that have been implemented at CPE Central Park, these include:

- specific measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire;
- inventory of potential pollutants on site;
- minimum safety equipment requirements;
- communication with the community;
- minimizing harm to persons;
- training of personnel; and
- testing of this document.

The plan details the procedures to be used in the event of a pollution incident including notification requirements. The plan links to existing safety, environmental and emergency systems and plans already in place at CleanPeak Energy's sites.

3 Environment Protection Licence (EPL) Details

Name of licensee (including ABN)	CPE Central Park Pty Ltd ABN 78 601 611 330
EPL number	20768
Premises name and address	3 Central Park Avenue Chippendale NSW 2008
Company or business contact details	**Name:** Kalpen Patel **Position or title:** Head of Precinct Energy **Business hours contact number/s:** 1300 038 069 **After hours contact number/s:** 1300 038 069 **Email:** kalpen.patel@cleanpeakenergy.com.au
Website address	https://cleanpeakcentralpark.com.au/
Scheduled activity/activities on EPL	Electricity Generation
Fee-based activity/activities on EPL	Generation of electrical power from gas

4 Pollution Incident – Person(s) Responsible

PIRMP activation	**Person responsible:** on-call operator **Position or title:** Plant Operator **Business hours contact number/s:** 1300 038 069 **After hours contact number/s:** 1300 038 069 **Email:** CTP@cleanpeakenergy.com.au
Notifying relevant authorities	**Responsibility:** Senior Management **Position or title:** General Manager, Legal & Commercial **Business hours contact number/s:** 02 9437 4065 **After hours contact number/s:** 1300 038 069 **Email: hseq@cleanpeakenergy.com.au**
Managing response to pollution incident	**Person responsible:** on-call Operator **Position or title:** Plant Operator **Business hours contact number/s:** 1300 038 069 **After hours contact number/s:** 1300 038 069 **Email:** CTP@cleanpeakenergy.com.au

5 Description and Likelihood of Hazards

Environmental risks associated with CleanPeak Energy's sites have been identified using the Risk Management Procedure. Refer to this document for further information on this process.

For the up-to-date list of risks related to the site, refer to the CPE Central Park Risk Register.

6 Pre-emptive actions to be taken

6.1 Prevention and Preparedness

The key to effective prevention of incidents is risk assessment, procedure development, training and monitoring. During operational activities, CPE Central Park's inspections and preventative actions include:

- Activity specific and daily risk assessments;
- Development of work procedures;
- Completion of routine environmental checklists;
- Issue and quick close-out of non-compliance notices;
- On-going environmental training;
- Environmental audits of work sites, subcontractors and compliance issues;
- Community notification;
- Safe Work Method Statements (SWMS).

The following specific measures are to be implemented to minimise the risk of environmental incidents occurring on site.

6.1.1 Spills and leaks (chemicals, fuel, hazardous liquids)

- Plan and implement works involving the use of chemicals, dangerous goods or other potential contaminants, to minimise the possibility of pollution.
- Use and store chemicals and dangerous goods strictly in accordance with relevant legislation, manufacturer instructions and the SDS.
- Establish transport, handling, storage and application methods (with the relevant method statement) to prevent chemical, fuel and lubricant spillage on or around the site.
- Keep adequate quantities of emergency response materials, such as oil spill kits, and absorbent materials readily available and in designated compounds.
- Ensure chemical drums removed from bunded areas are not left unattended.
- The major response to spills and leaks will involve containing the offending material.

6.1.2 Storage of liquids (chemicals, fuel, hazardous materials)

- Bund and cover all liquid storage areas – ensure 120% of liquids stored can be captured within the bund.
- Ensure storage areas are not within 3m of a stormwater drain.
- Arrange appropriate removal of waste liquid products.
- Ensure records are kept of water quality checks, discharges and any remedial actions taken.

6.1.3 Fire

- Fire-fighting equipment will be available on site and fit for use to facilitate an immediate response to a fire incident and help ensure the safety of public and property.
- No cutting, welding, grinding or any other activities with the potential to generate sparks will take place unless a hot-work permit has been approved.
- Provide personnel involved in work where there is a risk of fire being caused by hot work, such as welding, with adequate training about fire prevention, safety and basic fire-fighting skills.

For further information refer to the Emergency Response Plan.

6.1.4 Air Pollution

- Ensure generators are in serviceable condition at all times.
- Ensure SCR system is in serviceable condition at all times.
- Continuous monitoring of Urea tank level and provide audible alarms when urea tank level is sufficiently low that under normal circumstances a delivery of urea is able to be ordered and delivered prior to the tank running to empty.
- Ensure the integrity of the exhaust pipeline.

6.2 Safety equipment

The Operations Manager shall ensure that emergency equipment is available at each site, and appropriately located and maintained in good working order.

Materials for handling environmental spills, etc will include oil spill kits and sandbags, together with other items as deemed to be appropriate.

Specialised equipment available for an emergency response will be maintained in a “fit for purpose” state. On call equipment will be obtained through hire companies.

The Operations Manager, shall maintain a list of safety and environmental emergency response equipment held in the project store, ensure the ongoing availability of an adequate stock of consumable equipment and ensure all emergency equipment is being inspected, tested and maintained as necessary.

6.3 Minimising harm to persons on the premises

In the event of an emergency that is likely to cause harm to persons the Emergency Response Management Plan shall be followed.

7 Inventory of pollutants

7.1 Hazardous substances register

A Hazardous Substances Register has been developed for the CleanPeak Energy sites. This is maintained by the Operations Manager and will be made available to Emergency Services as required. The Hazardous Substances Register includes an indication of quantities stored on the sites. The first aid officer shall be notified of the location of the register and have ready access if the need should arise.

7.2 Safety Data Sheets (SDSs)

The Operations Manager will ensure that SDSs for all hazardous substances on the site's Hazardous Substances register are available to Emergency Services as required. The first aid officer shall ensure all relevant SDS' and the Register of Hazardous Substances is available.

7.3 Handling and storage of hazardous substances

Hazardous and dangerous substances (including all fuels, oils, lubricants and chemicals) brought onto the sites are only to be handled or stored within designated bunded areas to ensure retention of any spills or leaks. Storage and bunding for areas for hazardous liquids is to conform with *AS1940 Storage and Handling of Flammable Liquids* and *AS/NZS 4452 – Storage and Handling of Toxic Substances*. Storage of hazardous solids must be in accordance with the SDS and where practicable is to be undercover within bunded areas.

Requirements associated with AS 1940 and AS/NZ 4452 include but is not limited to:

- storage areas shall be secured against unauthorised entry;
- a supply of water shall be available at a nearby location, for personal hygiene;
- adequate ventilation shall be provided for all storage and handling areas;
- packages shall not be kept near substances with which they are incompatible or with which they may react dangerously;
- packages shall be kept away from sources of heat;
- packages shall be kept securely closed when not in use;
- packages shall be kept in such a manner as to avoid spillage;
- appropriate spillage-retention measures shall be provided at locations where packages are likely to be opened or their contents transferred;
- the contents of a package shall not be transferred to any other container for storage, unless the latter is suitable for the storage of the toxic substance and is clearly marked;
- appropriate control measures shall be instituted for any process involving product transfer operations, e.g. decanting or filling;
- appropriate personal protective equipment shall be worn by any person involved in product transfer operations; and
- any spills or leaks shall be cleaned up immediately, and disposed of appropriately according to the standard.

7.4 Waste handling and storage

Where waste is required to be handled and stored onsite prior to onsite reuse or offsite recycling/disposal, the following measures apply:

- liquid wastes are to be stored in appropriate containers in bunded areas until transported offsite. Bunded areas will have the capacity to hold 110% of the liquid waste volume for bulk storage or 120% of the volume of the largest container for smaller packaged storage;
- hazardous waste will be managed by appropriately qualified and licensed contractors, in accordance with the requirements of the Environmentally Hazardous Chemicals Act 1985 and the EPA waste disposal guidelines; and
- all other recyclable or non-recyclable wastes are to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling.

7.5 Air Quality

Precautions to minimise the creation of smog include:

- The installation of an exhaust scrubbing system to decrease the amount of nitrous oxides emitted to the air.
- Keeping the exhaust scrubbing system in a serviceable condition at all times by following the manufacturer's recommended maintenance regime.
- Keeping a minimum amount of urea stock on hand – enough to reasonable expect delivery or more stock prior to running out.

8 Notification

Incident Notification to authorities depends on the nature and severity of the incident.

Notification to first responders - Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service - must be carried out immediately or as soon as practicable, as they are responsible for controlling and containing incidents.

All incidents must be notified to either the District Energy Systems Manager, or CleanPeak Energy Senior Management, as soon as practicable.

The District Energy Systems Manager, or CleanPeak Energy Senior Management, will proceed notifying the relevant authorities as required.

All notification requirements are detailed below:

Type of incident	Authority	Person Responsible
Immediate threat to human health or property	Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service - Call 000	Operator on duty, or on-call operator
Pollution Incident	EPA - Call the Environment Hotline: 131 555	CPE Senior Management
Serious injury	SafeWork NSW – Call 131 500	

8.1 Pollution incidents

Pollution incidents reportable to the EPA will be notified as required, within 24 hours, to ensure that the EPA is aware of any potential negative environmental impacts and can respond appropriately. Failure to notify the EPA of such an occurrence is an offence and penalties may apply.

INITIAL EPA NOTIFICATION

The following details must be defined, and provided to Senior Management who will proceed with the initial EPA notification:

- name and telephone number of an appropriate contact person on site
- location of the incident
- time and date of the incident
- nature of the incident
- action taken by the site to minimise any harmful effect to the environment.

8.2 Communicating with neighbours and the local community

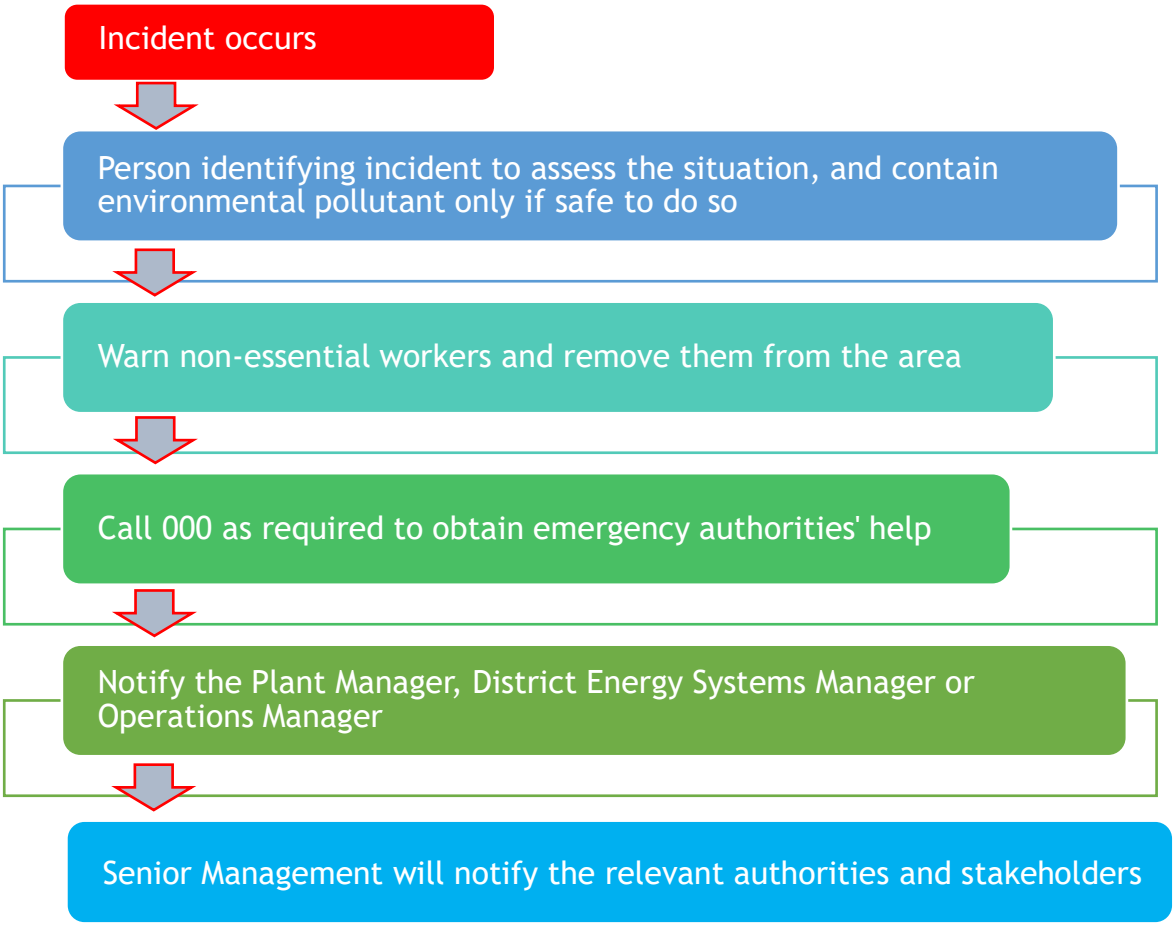
In the event of a pollution incident, affected business and residential customers and the local community will be notified of any measures they can undertake to minimise the risk of harm.

Notification will be carried out by emergency services or CleanPeak Energy personnel as relevant.

9 Pollution Incident Response Procedure

9.1 General

In the event of a pollution incident, the general emergency response and notification procedure is shown below



At any one time, as soon as a situation is assessed to be severe enough to require assistance from other Operators, Plant Managers, or Senior Management, the Duress alarm must be activated, and incident reported over the phone for further help or instructions.

9.2 Liquid spill

	Action	Comments
1	**Assess the situation**	For major leaks – use the Duress alarm. If spill has escaped off-site notify Operations Manager immediately.
2	**Stop further leak**	If leak from pipe, close valves etc. If leak is from oil drum, roll drum so that the leak area is uppermost.
3	**Isolate the area**	Stop human and vehicular traffic and isolate area.
4	**If liquid is flammable or produces flammable gas, eliminate all sources of ignition**	- Do not use any electrical switches in the affected area - If possible, cut off all automatic switching in the area - Stop any hot works being carried out - Do not use a mobile phone in the area
5	**Stop spreading of spill**	Utilise spill kit to form barrier around leak/spill
5	**Install barrier around drains/outlets**	Seal drain grates with spill kit supplies or putting sandbags around drains.
7	**Remove spill**	**Use spill kit materials**
8	**Clean-up**	Store contaminated material back into the spill kit bin.
9	**Inform Operations Manager**	Record incident and review procedures.
10	**Report incident**	Main person responsible for handling the incident to report to the HSEQ Officer, and assist with Incident Investigation and Reporting

9.3 Natural Gas Leak

	Action	Comments
1	**Assess the situation**	If safe to do so, measure gas concentration in the area affected to ascertain the extent of the leak. For major gas leaks, use the Duress alarm.
2	**Evacuate workers from the area**	For major gas leaks, do not enter the area until it is determined to be safe
3	**Shut off the supply of gas to the leaking equipment/area**	In case the BMS does not do that automatically, assess the situation to determine the extent of the shut off required.
4	**Eliminate all sources of ignition**	- Do not use any electrical switches in the affected area - If possible, cut off all automatic switching in the area - Stop any hot works being carried out - Do not use a mobile phone in the area
5	**Ventilate the area**	Increase forced ventilation if possible. Open doors and windows as possible or required to allow gas to escape to safe areas only
6	**Inspect the area post ventilation**	Measure gas in the area affected to ensure the hazard is no longer a threat – for natural gas, that's less than 10ppm for continual exposure, and 50ppm for 15 min exposure.
7	**Report incident**	Main person responsible for handling the incident to report to the HSEQ Officer, and assist with Incident Investigation and Reporting

9.4 Carbon Monoxide Leak

	Action	Comments
1	**Assess the situation**	Symptoms of carbon monoxide exposure can include: ○ Nausea ○ Light-headedness e ○ Headaches ○ Shortness of breath ○ Dizziness ○ Sleepiness
2	**Evacuate workers from the area**	For major leaks, use the Duress alarm to warn others Stay away from the area until it is determined to be safe
5	**Ventilate the area**	Increase forced ventilation if possible. Open doors and windows
6	**Investigate the source of CO**	If possible, eliminate the source immediately, if not, maintain ventilation until the situation is rectified
7	**Report incident**	Main person responsible for handling the incident to report to the HSEQ Officer, and assist with Incident Investigation and Reporting

9.5 Biological Contaminants

In case an incident affects systems that control the spread of biological contaminants, negative effects such an increase of biological contaminants to harmful levels may never eventuate, but must be monitored nevertheless.

A full risk assessment must be carried out in case such incident occurs, and further monitoring and testing carried out as deemed necessary to contain the extent of the contamination.

9.6 Clean-up

In the event of a pollution incident clean-up actions will be established. This may involve the removal of used spill kits and disposal in appropriate bins. If a pollution incident occurs resulting in material harm the clean-up process will be managed by appropriately qualified and licensed contractors as necessary (e.g. liquid wastes/ asbestos waste) and in accordance with the requirements of the EPA waste disposal guidelines.

10 Training and Testing

All CleanPeak Energy staff will be trained in the specific competencies required to respond to an emergency situation on each site. Training needs for emergency response will include any environmental emergency response training.

Training will be provided to:

- attain or refresh specific skills such as emergency response drills, evacuations, fire wardens, first aid, etc;
- enable the proficient use of specialised equipment;
- ensure detailed familiarity with the provisions of this plan and supporting procedures;
- ensure learnings from mock evacuation and other emergency management exercises are communicated; and
- ensure knowledge of legislative and statutory requirements.

All CPE Central Park staff will also receive some training to ensure that they are fully aware of their roles and responsibilities in the event of an emergency situation arising. This training will generally be provided through:

- Site inductions – provided to all employees and subcontractors prior to commencement on site. Content includes basic emergency procedures and incident reporting.
- Toolbox meetings – mainly covers safety issues but can be used as refresher training on response procedures, dealing with the public, locations and use of response equipment.

10.1 Testing plans

Environmental response procedures may be tested in areas where a pollution risk is present, such as in workshops. Personnel involved in emergency response activities will be provided with specific training.

An up-to-date list of emergency response personnel and organisations will be maintained at the main office and compounds. Testing of the plan must occur every 12 months to ensure that information in the plan is accurate and capable of being implemented effectively. The plan will also be tested within one month of any pollution incident.

All PIRMP implementation and testing records will be kept within CleanPeak Energy's intranet, in SharePoint, and will be accessible to all site personnel.

Definitions

Term	Definition
Emergency	Any event which arises internally, or from external sources, and which may adversely affect persons or the community generally and requires an immediate response.
Emergency Response Procedures	A documented scheme of assigned responsibilities, actions and procedures within a designated section of the emergency response plan, to respond to and manage emergencies.
EPA	NSW Government body Environmental Protection Authority.
Pollution Incident	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.

References

Title	Document Reference
Emergency Response Review Form	HSE-FRM-0013

Document Control

Revision	Owner	Description	Approved By
1.0	Ryan Georges	Initial issue – December 2020	Ryan Georges
2.0	Jane Mitsuishi	Annual Review December 2021	Adrian Mitchell
3.0	Adrian Mitchell	Annual Review – December 2022	Adrian Mitchell

11 Appendix A – Maps

11.1 Location Selection and Equipment Layout

12 Appendix B – Legislative Requirements

Legislation	Requirement	Section in this PIRMP where requirement met
POEO Act: Part 5.7A Duty to prepare and implement pollution incident response management plans		
153A Duty of licence holder to prepare pollution incident response management plan	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this part in relation to the activity to which the licence relates	This plan
153C Information to be included in the plan	A pollution incident response management plan must be in the form required by the regulations and must include the following: 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: 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 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 iii. Any persons or authorities required to be notified by Part 5.7.	8 Notification
	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.	9 Response Procedure
	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.	8 Notification
153D Keeping of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	Specific reference to the site

Legislation	Requirement	Section in this PIRMP where requirement met
153E Testing of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.	Requirement to test annually 10.1 Testing plans
153F Implementation of plan	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part	Required by plan
Protection of the Environment Operations (General) Regulation 2009: Part 3A Pollution incident response management plans		
98B Form of plan	1) A plan is to be in written form	Yes
	2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.	Yes – in future consider merging with ERP (as appendix)
98C Additional matters to be included in the plan	3) General – The matters required under section 153C (d) of the Act to be included in a plan are as follows: a. A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity).	Yes
	b. The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Yes
	c. Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity	Yes
	d. An inventory of potential pollutants on the premises or used in carrying out the relevant activity	Yes
	e. The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates	Yes
	f. A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident	Yes
	g. The names, positions and 24-hour contact details of those key individuals who: i. Are responsible of activating the plan, and ii. Are authorised to notify relevant authorities under section 148 of the Act, and	Yes

Legislation	Requirement	Section in this PIRMP where requirement met
	iii. Are responsible for managing the response to a pollution incident	
	h. The contact details of each relevant authority referred to in section 148 of the Act	Yes
	i. Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on	Yes
	j. The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Yes
	k. A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.	Yes
	l. A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk	Yes
	m. The nature and objectives of any staff training program in relation to the plan	Yes
	n. The dates on which the plan has been tested and the name of the person who carried out the test	Yes
	o. The dates on which the plan is updated	Yes
	p. The manner in which the plan is to be tested and maintained.	Yes
	2) Trackable water transporters	Yes
98D Availability of plan	A plan is to be made readily available: a. To an authorised officer on request, and b. At the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.	Yes
	A plan is also to be made publicly available in the following manner within 14 days after it is prepared: a. In a prominent position on a publicly accessible website of the person who is required to prepare the plan, b. If the person does not have such a website-by providing a copy of the plan, without charge, to any person who makes a written request for a copy.	1 Introduction
	Subclause (2) applies only in relation to that part of a plan that includes the information required under: a. Section 153C (a) of the Act, and	1 Introduction

Legislation	Requirement	Section in this PIRMP where requirement met
	b. Clause 98C (1)(h) and (i) or (2)(b) and (c) (as the case requires).	
	Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).	
98E Testing of plan	1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.	Yes
	2) Any such test is to be carried out: a. Routinely at least once every 12 months, and b. Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner	Yes