BRWF Pollution Incident Response Management Plan

EPL 20434

4 October 2024

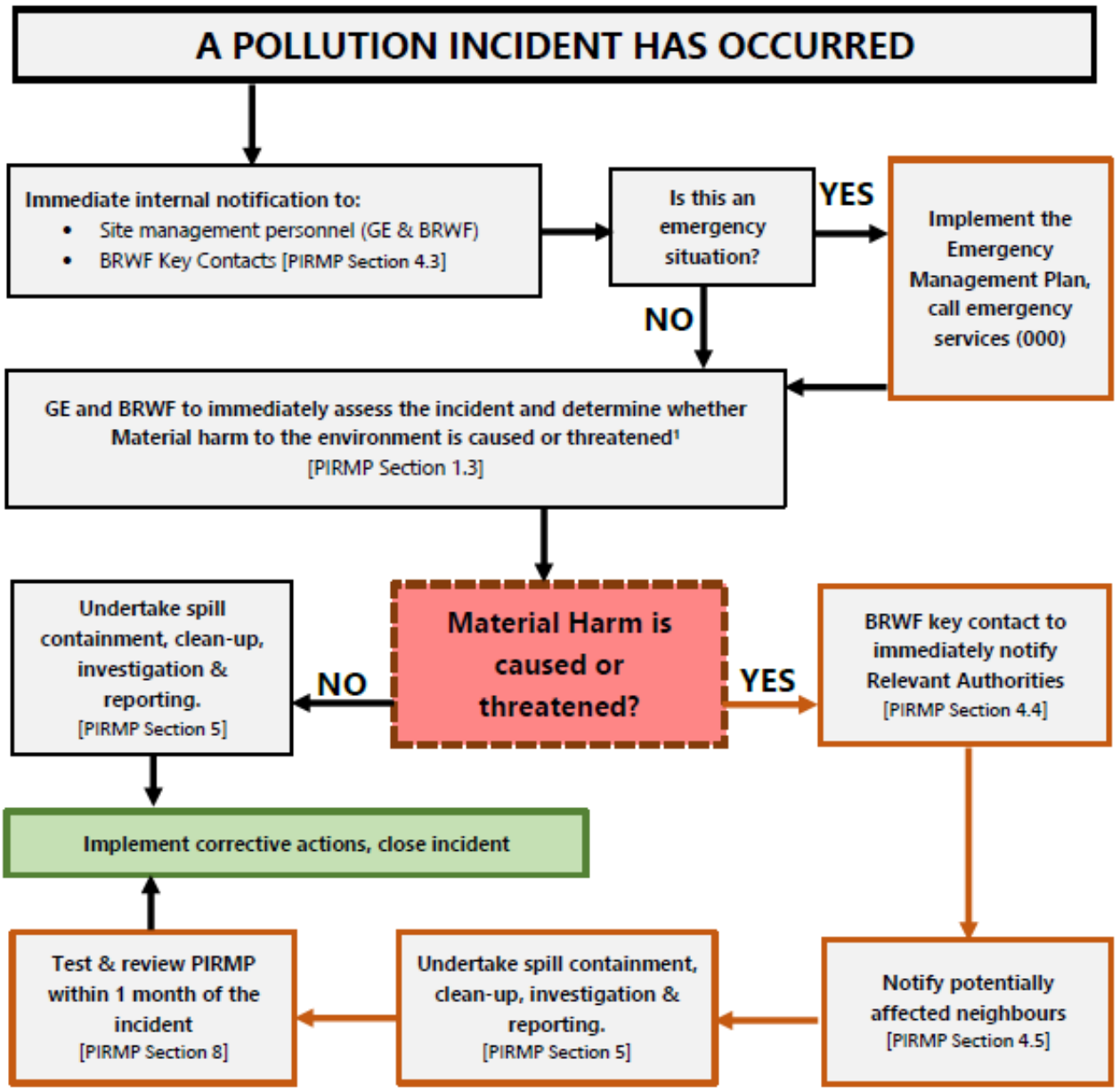
Final

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Signature
1	08/03/21	Final Draft	M Pais Soto	A Gordijn	Jose Fortes	General document update
2	31/01/22	Final/Issued	J McNamara	M McGuire	Michael McGuire	Inclusion of flooding incidents
3	11/03/2022	Final/Issued	J McNamara	D Laing	D Laing	General document updates and Annual Test
4	21/04/2022	Final/Issued	J McNamara	D Laing	D Laing	General document update
5	24/04/2023	Final/issue	Z Jokadar	D Laing	D Laing	PIRMP desktop test and general doc review. Convert to SQE template
6	25/10/2023	Final/issue	Z Jokadar	D Laing	D Laing	Update of Document following Spill Incident
7	04/10/2024	Final/issue	Z Jokadar	D Laing	D Laing	Annual PIRMP test- Practical and update Plan

Confidentiality

Disclaimer



BRWF Key Contacts

Key contact	Position	Contact details (24hrs)
David Laing	Operation Manager (SQE)	0427 786 322
Zeina Jokadar	Environmental Advisor (SQE)	0476 882 365
Ben Deer	Operations Manager (SQE)	0429 071 864
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Contents

Figures

Tables

1 Introduction

1.1 Purpose of this PIRMP

This Pollution Incident Response Management Plan (PIRMP) has been prepared as part of Environment Protection Licence (EPL) 20434 and is designed to be a tool for BRWF S1 personnel to respond in a practised and well-planned manner in the event of a pollution incident at Boco Rock Wind Farm Stage 1 (BRWF S1).

The PIRMP will be used to manage the impact of a pollution incident to employees, neighbours, the wider community and the environment both on and off site.

The PIRMP ensures comprehensive and timely communication about a pollution incident to all personnel present at the BRWF S1, immediate neighbours, the Environmental Protection Authority (EPA) and other relevant agencies (refer to Section 4), as required.

The PIRMP minimises the risk of a pollution incident by firstly identifying the risks, putting measures in place to reduce the likelihood of an incident occurrence and finally planning and practising the response to a pollution incident.

1.2 Definition of pollution incident

The *Protection of the Environment Operations Act 1997* (POEO Act) defines a pollution incident as:

"…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."

1.3 Duty to notify 'material harm to the environment'

The holder of an EPL is required to notify the relevant authorities if there is a risk of "material harm to the environment."

Harm to the environment is determined as being 'material' if:

1. **It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or**
2. **It results in actual or potential loss of property damage of an amount or amounts in aggregate exceeding $10,000 (or such other amount as is prescribed by the regulations); and**
3. **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.**

It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

An incident is not Trivial if there are:

- At least four independent and bona fide complaints based on annoyance issues,

- At least one complaint based on a health issue that resulted with medical assistance or has medical certificate
- A media organisation is involved
- Only these above can trigger Material Harm below the $10,000 clean up and make good criteria.

Licence holders are required to report material harm pollution incidents immediately (this means without delay) to all of the appropriate Regulatory Authorities.

These appropriate Regulatory Authorities are the:

- NSW Environment Protection Authority (EPA);
- NSW Department of Planning , Housing and Infrastructure (DPHI);
- NSW Ministry of Health;
- SafeWork NSW;
- Glen Innes Severn Council;
- Inverell Council;
- Fire and Rescue NSW.

Failure to notify in accordance with the Act carries a maximum penalty of $2 million for corporations; and for continuing offences, a further penalty of $240,000 per day the offence continues.

For individuals, the maximum penalty is $500,000, and for continuing offences, a further penalty of $120,000 per day the offence continues.

A flowchart for responding to a Pollution incident and determining Material Harm is provided at Figure 1. Refer to Section 4.4 for full details of Regulatory Authority notification requirements.

1.3.1 Access to site and determination of Material Harm

Under certain emergency situations or while an incident is still unfolding, and where access to the site is limited or prevented by the Authorities or responding Agencies or emergency services or similar, the evaluation and determination of Material Harm can only be made once full and unimpeded access by the to the entire site is possible, by at least one member of the BRWF S1 Key Contacts (see Table 8).

Activation of the PIRMP

Pursuant to the PIRMP Guidelines (NSW EPA, 2022) Section 2.2.1: *It is an offence not to implement (activate) a PIRMP if a pollution incident occurs that causes or threatens to cause material harm. Penalties for not implementing the PIRMP are set out in Section 2.7 of this Guideline.*

For the purposes of this PIRMP, implementing the PIRMP occurs when the Regulatory Authorities have been notified, as outlined in Section 4.4 of this PIRMP

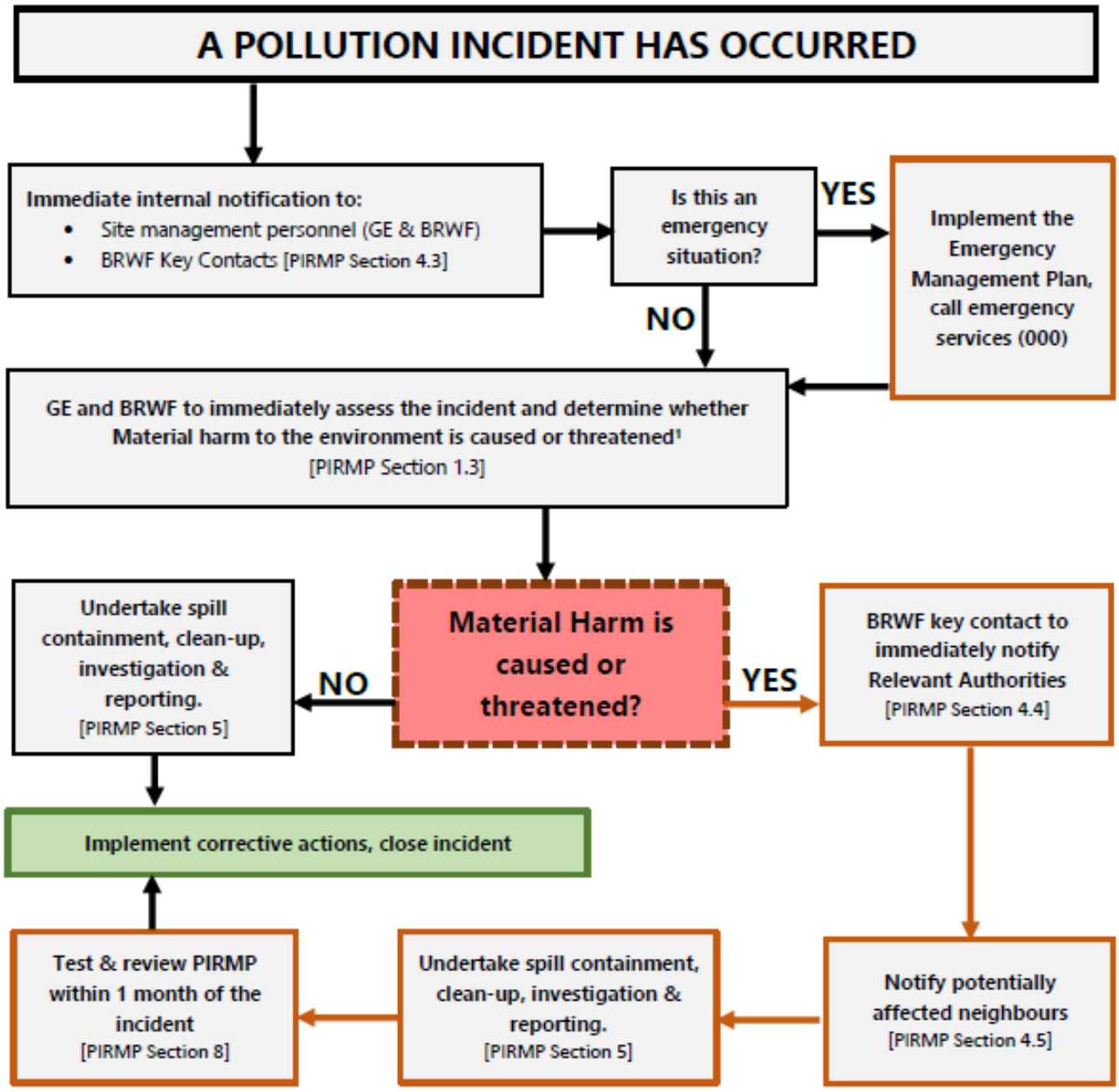

Figure 1 Flowchart for pollution incident immediate response, assessment of Material Harm & notifications

1.4 Legal requirements for this PIRMP

The *Protection of the Environment Legislation Amendment Act 2011* introduced changes designed to improve the way pollution incidents are reported and managed in NSW. The changes apply to the holders of Environmental Protection Licences.

The requirements for PIRMP are set out in Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act 1997) and Chapter 4 of the *Protection of the Environment Operations (General) Regulation 2022*. In summary these provisions require that:

- all holders of an EPL prepare, implement and test a PIRMP;
- the plan includes the information detailed in the POEO Act (section 153C). These requirements are reproduced in Table 1; and
- the plan must be kept at the premises to which the EPL relates.

Table 1 Requirements for a PIRMP, Section 153C POEO Act

Clause Number	Requirement	Section in this Plan
POEO Act, Section 153C		
153C 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	Sections 4.3, 4.4, 4.5
153C 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,	Sections 4 & 5
153C 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.	Section 4.3, 4.4
153C d	Any other matter required by the regulations.	See below.
POEO (General) Regulation, Section 72		
72 a	A description of the hazards to human health or the environment associated with the activity to which the licence relates	Appendix A
72 b	The likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood	Appendix A
72 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	Section 3
72 d	An inventory of potential pollutants on the premises or used to carry out the relevant activity	Section 2.8
72 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	Section 2.8

Clause Number	Requirement	Section in this Plan
72 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	Section 3.3
72 g	The names positions and 24 hour contact details of individuals who; Are responsible for activating the PIRM plan Are authorized to notify relevant Authorities under the Act section 148 Are responsible for managing the response to the pollution incident	Section 4.3
72 h	Contact details of each relevant authority referred to in the Act section 148.	Section 4.4
72 i	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of the premises near the premises to which the licence relates	Section 4.5
72 j	The arrangements for minimizing the risk of harm to any persons who are present where the scheduled activity is being on	Section 3
72 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	Figure 2 & Figure 3
72 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	Appendix A Section 3 and Section 4
72 m	The nature and objectives of a staff training program in relation to the PIRM plan	Section 6
72 n	The dates on which the PIRM plan has been tested and the name of the person who carried out the test	Section 8
72 o	The dates on which the PIRM plan is updated	Table of Revisions
72 p	The way in which the PIRM plan must be tested and maintained	Section 8
Other requirements of the plan		
74	A PIRM plan must be made readily available to an authorised officer on request, and to a person who is responsible for implementing the PIRM plan at the premises to which the relevant licence relates, or where the activity takes place. A PIRM plan must be made publicly available within 14 days after it is prepared in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan, if the person does not have a website—by providing a copy of the PIRM plan, without charge, to a person who makes a written request for a copy.	Section 7
75	A PIRM plan must be tested routinely at least once every 12 months, and if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring. The test must be carried out in a way to ensure the information included in the PIRM plan is accurate and up to date, and the PIRM plan is capable of being implemented in a workable and effective way	Section 8

1.5 Relationship to other plans and protocols

This PIRMP forms part of the overarching Environmental Management System for the BRWF S1 and is to be read in conjunction with the **Operational Environmental Management Plan** (OEMP) for the BRWF S1.

An **Emergency Management Plan** has been developed for the BRWF S1, which provides the details and protocols for dealing with the following hazards and incident types:

- General Emergency Response
- Motor Vehicle Accidents
- Medical Emergencies
- Fires including Bush Fires
- Evacuating Buildings
- Electrical Emergencies
- Threats (bomb, violence, other).
- Contact with Underground / Overhead Services.
- Plant Roll Over's.
- Environmental Incidents.
- Chemicals Spills.
- Excavation Collapse.
- Electric Shock

If any of the above incidents resulted in a pollution incident, then the PIRMP would also be used.

2 Site details

2.1 Project location

Boco Rock Wind Farm (the Project) is located on the high-altitude plateau of the Monaro high plains, 10km south west of the town ship of Nimmitabel and 30km north of Bombala, New South Wales (NSW) and approximately 40km south of Cooma and 140km south of Canberra.

2.2 Project approvals and licenses

State Approval

The Project is subject to the application MP09_0103 Modification 1, which was approved 23 December 2022. The Project comprises of Stage 1 currently operational and subject of this PIRMP; and Stage 2 not yet built.

Commonwealth Approval

The Project was approved by the Commonwealth Department of the Environment (DoE) on 29th September 2010, subject to a number of Conditions of Approval.

Environment Protection Licence

The *Protection of the Environment Operations Act 1997* (POEO Act) was amended in 2013 to make the NSW Environment Protection Authority (EPA) the regulatory authority for large-scale wind farms. The

changes commenced on 28th June 2013 with transitional provisions applying to existing wind farms and wind farms under construction or about to commence construction, including the Project.

EPL 20434 was issued on 10 June 2014 and is held by Boco Rock Wind Farm Pty Ltd.

In accordance with EPL 20434, the scheduled activity is electricity generation with a scale of >450 – 1000 GWh annual generating capacity.

2.3 Organisation structure and responsibilities

The Project approval has been granted for Boco Rock Wind farm Pty Ltd, the proponent with ultimate responsibility for the Project's implementation. BRWF S1 is 100% owned by the Electricity Generating Public Company of Thailand (EGCO) via holding companies.

Squadron Energy Pty Ltd (SQE) has been engaged to manage and operate BRWF S1 on behalf of EGCO. WTG maintenance services are subcontracted by EGCO to GE Energy (GE). A long-term contract is also awarded to the Balance of Plant contractor, to maintain the electrical systems (substations, WTG kiosks and underground cabling).

Staff working on the site all have the following responsibilities:

1. Immediately ceasing and reporting any workplace activity (including that of other persons) which presents an immediate risk to people, the environment or property.
2. Where possible, taking immediate steps to control identified hazards in the workplace.
3. Working in a safe manner, without risk to themselves, others or the environment.
4. Complying with all management plans and procedures, including this PIRMP.
5. Complying with site rules
6. Reporting any faulty plant or equipment to the BRWF S1 Operation Manager immediately.
7. Reporting all incidents, near misses and hazards to the BRWF S1 Operation Manager immediately.
8. Ensuring full compliance with instruction and training provided by CWP or their own employer.
9. Use of equipment provided to reduce environmental hazards or emissions.

2.4 Operations and maintenance activities

Activities on the site are associated with the ongoing maintenance of the wind turbines, the Project's substation, and the associated electrical infrastructure. This includes maintenance works for the roads, hardstands, drainage systems and fences and gates.

The wind farm is operated from the Site Offices in the Operations & Maintenance compound with remote 24/7 monitoring, and is next to the Project's substation. Except when major repairs are being undertaken site maintenance activity will generally be undertaken by light vehicles and the occasional delivery truck for spare parts. When major repairs are required, equipment such as large cranes and trucks will be brought onto site..

The Operation Manager is located on site and is responsible for the day to day management of the BRWF S1. They will be responsible for implementing this Plan.

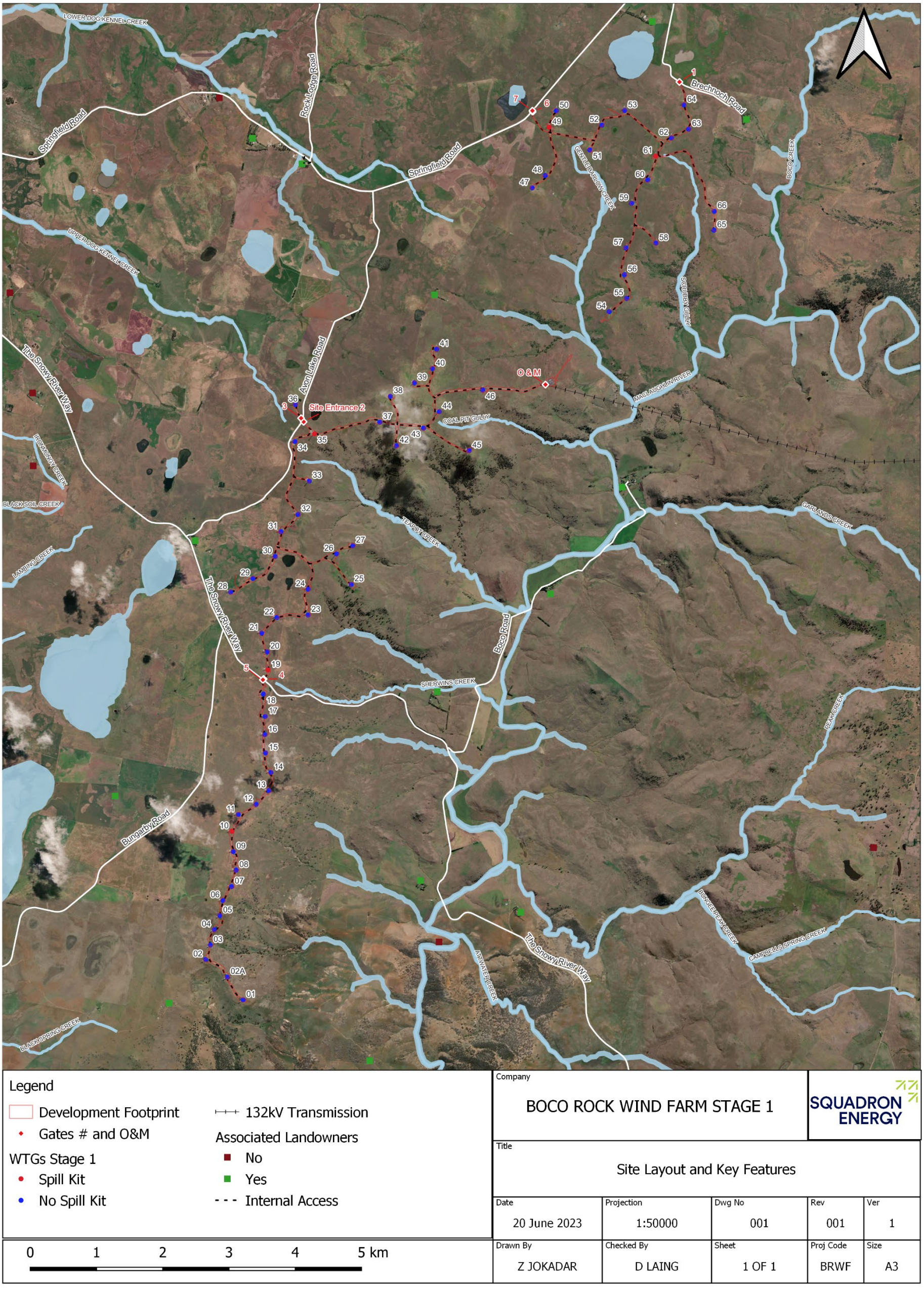

Figure 2 Site layout

2.5 Receiving environments

This section summarises the environmental values and receivers that could be affected by a pollution incident at the BRWF S1 site.

2.5.1 Drainage lines and watercourses

There are a number of dry creeks and drainage lines that occur within and near the BRWF S1. Stormwater drainage infrastructure (eg. table drains, culverts) has also been constructed to convey surface flows from the access roads and hardstand areas. Refer to Site layout Figure 2.

Large areas of the BRWF S1 drain towards the MacLaughlin River, located east of the BRWF S1. The MacLaughlin River flows in a northerly and easterly direction, and feeds into the Snowy River approximately 30km south of the BRWF S1.

2.5.2 Ecological values

The site contains Natural Temperate Grassland, a vegetation community listed as Critically Endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The site contains habitat for a variety of native fauna, including habitat for the following threatened species:

- Grassland Earless Dragon (*Tympanocryptis pinguicolla*) - Endangered, Biodiversity Conservation Act 2016 (BC Act) and EPBC Act
- Striped Legless Lizard (*Delma impar*) – Vulnerable, BC Act & EPBC Act
- Little Whip Snake (*Suta flagellum)* – Vulnerable, BC Act

2.5.3 Sensitive receivers

There are several residential dwellings located within 5km of Project. Refer to Figure 3 for locations in relation to the Project and Table 10 for contact details.

2.6 Site hazards

Potential hazards to human health and the environment that may occur from incidents on the BRWF S1 site may include, but are not limited to those listed in Table 2. Circumstances that may increase the likelihood of their occurrence are also described in Table 2.

Table 2 Potential site hazards and circumstances that could increase their likelihood

Hazard	Circumstances or events that could increase the likelihood
Explosion or fire	Storage of explosive/ flammable materials.
Bushfire	Surrounding and onsite vegetation increases bushfire risk, via increased fuel load.
Escape, spillage or leakage of hazardous substances from storage areas, vehicles or equipment.	Poor housekeeping and/or storage of hazardous substances. Poor operation of vehicles or equipment leading to an accident. Inappropriate maintenance regimes (e.g., spillage from machine breakdowns).
Water pollution	Escape, spillage or leakage of hazardous substances to stormwater drainage. Erosion and sediment, from inadequate drainage controls.
Air pollution	Unsealed roads, vehicles causing dust. Emissions from plant and equipment.

Hazard	Circumstances or events that could increase the likelihood
	Fire (smoke)
	SF6 gas

This Plan considers both air and water-based pollution incident impacts. The site is managed in accordance with the OEMP which includes management practices to effectively minimise the likelihood and impact of a pollution incident. However, pollution incidents may occur despite the best design and management methods being in place. Such accidental events are also covered in the Plan using incident response methods.

2.7 Likelihood of Hazards Occurring

A Pollution Incident Risk Assessment has been undertaken and is included in Appendix 1 . This assessment was used by Boco Rock Wind Farm Pty Ltd to identify the risks associated with the activity, put management measures in place to reduce the likelihood of any significant risks occurring and therefore minimise the likelihood of a pollution incident.

2.8 Inventory of potential pollutants

Operation and maintenance activities of mechanical equipment uses and generates various types of hazardous materials and pollutants which are considered in the PIRMP. Table 3 lists the main types of pollution sources that exist on the site or which could cause potential incidents at the BRWF S1 site.

Consult with GE for the current pollution inventory/materials stored on site.

Table 3 Typical pollutants at BRWF S1

Description	Comments
AIR BASED EMISSIONS	
Dust	From machinery driving on haul roads and crushing of materials
Smoke (from fires)	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours.
Noise	Emitted by plant and equipment. Emitted by the operation of then WTG
SPILL TYPE EMISSIONS	
Class 3 flammable liquids e.g. Fuels including petrol-based fuels and. Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations. Diesel is used on site to power the maintenance equipment and machinery. A limited amount will be stored on site in a double bunded Trans tank at the site compound. Additional fuel will be sourced from either Cooma or Canberra via a commercial tanker
Other dangerous Goods classes e.g. **Compressed gases** **Corrosive substances** **Oxidizing substances** **Toxics** **Other dangerous goods**	Used for a variety of purposes on site, Used for a variety of purposes on site, usually in small quantities
Insulating Oil	Stored in suitable containers Used in accordance with SDS
Hydraulic Oil	Stored in suitable containers

Description	Comments
	Used in accordance with SDS
Cleaning agents	Stored in suitable containers Used in accordance with SDS
Sewage effluent	Pumped out of tanks
Coolant	Stored in suitable containers Used in accordance with SDS
OTHER EMISSIONS	
Sediments, sediment laden waters	Could result from erosion of soils, roads etc.
Wastes	Storage of wastes and wastes containing chemicals
Treated packaging	Removed from site
Water and soil	From flooding or rainfall events

3 Pre-emptive actions to minimise or prevent any risk of harm to human health or the environment

3.1 Plans and protocols

Operation of the BRWF S1 is carried out in accordance with the Project approvals and associated Management Plans, including:

- This PIRMP
- Operational Environmental Management Plan
- Bird and Bat Adaptive Management Plan
- Emergency Management Plan (note: DPHI approval not required)
- Safety Management Plan (note: DPHI approval not required)

These documents provide the principal reference for site environmental management during operation.

Specific pre-emptive actions are outlined in the following sections.

3.2 Installed pollutant control measures

The measures listed in Table 4 will be implemented to prevent pollution to the environment when storing and handling various chemicals and substances:

Table 4 Pollution control measures during operations

Product	Storage/ control technique - Operations
Diesel Fuel **Lubricants** **Coolants** **Solvents**	Store in dedicated cabinets / containers at Operations and Maintenance Facility during operations Transport around site in dedicated containers. Maintain hazardous substances register on site and SDS for all listed items
Transformer oils	Substation transformer is located within a purpose-built concrete bund and drains to a secondary containment tank with adequate capacity to contain the stored volume of oil.
Waste oils	Stored in drums in the oil store / bunded area prior to transport off site for disposal.
Paint	Stored in original container
LPG	Certified storage vessels to Australian codes and standards
Herbicides	Transport around site in dedicated containers Application by qualified operators Application in accordance with label.
Sewage	Storage of sewage in underground tanks. Pump out and transportation/disposal by licensed waste contractor.

Table 5 Other pollution control measures

Products	Control measures
Water and Soil	• Install erosion and sediment control measures • Rehabilitate disturbed areas • Monitor rehabilitation to identify and rectify erosion and drainage issues • Inspect and maintain equipment to detect and correct any potential oil or fuel leaks • Implement safe handling oil, fuel and chemicals procedures • Store all hazardous liquids in suitable containment areas • Provide suitable spill control equipment • Provide training in containment and recovery procedures
Air	• Maintain compacted surface on site roads • Stabilise and rehabilitate all disturbed areas to prevent or minimise dust generation • Ensure vehicle speeds are below site speed limit during increased dust risk • Ensure all vehicles are properly maintained to minimise emissions • Maintain and monitor equipment containing gases (monitor gauges and alarms)
Noise	• Comply with approved working hours or any approved OOHW requirements; • Investigate complaints • Undertake noise monitoring if required and report noise monitoring results; • Implement suitable noise controls as advised by the noise monitoring study
Waste management and soil contamination	• Separation of wastes; • Storage and handling procedures – covered waste storage skips or bins; • Waste classification where required; • Appropriate and compliant disposal of wastes; • Testing, storage and treatment or disposal of contaminated soil; • Managing waste bunds and prevent from being filled with water or dewatering as required;

Products	Control measures
	• Securing any loose items to prevent contact with floodwater.
Environmental Management	• Ensure all hazards have been identified and are included in the Site Risk Register • Ensure all hazards are appropriately addressed by suitable control measures (risks acceptable) • Ensure that the management system provides regular inspections of the effectiveness of controls

3.3 Inventory of incident response equipment

Table 6 below provides an inventory of the response equipment and other devices available on site to minimise the risks to human health, the environment and to contain/control a pollution incident at BRWF S1.

Table 6 Pollution control equipment available

Product	Location on site	Purpose
Spill Kits	Operations, maintenance facility and substation Inside tower of selected WTGs (refer to Figure 1) Hardstands during erection / repairs (mobile kits)	Control of minor spills
SDS	Operations and maintenance facility	Provide data on chemicals
Drip trays	Fuel Cabinet	Control spillage when refuelling
Bunded containers	Fuel Cabinet	Used to store containers of chemicals, fuels and the like
First Aid Kits	Operations and maintenance facility All vehicles	For administering first aid
Fire Extinguishers	Operations and maintenance facility and WTGs All vehicles	Control of any minor fire

3.3.1 Spill kits

Spill kits are located at hazardous material storage locations, and at the base of turbines 10, 19, 35, 49 and 61. Typical spill kit materials, their application and use are described below:

- **Sorbent granules** – Can be spread over the spill to soak up liquid spills.
- **Sorbent pads** – Can be used for thinly spread liquids to soak up the liquid spill.
- **Sorbent booms / socks** – Can be deployed to divert / contain small liquid spills.
- **Nitrile gloves** – To be used when applying spill kit materials and handling contaminated materials.
- **Waste disposal bags** – To contain and dispose of used/ contaminated spill kit materials.

3.4 Actions to minimise a pollution incident

The following actions have been undertaken or are ongoing and aim to minimise an event from which a pollution incident may result:

- A Pollution Incident Risk Assessment has been undertaken and is included in Appendix A. In this assessment BRWF identify the risks associated with activity, put management measures in place to reduce the likelihood of any significant risks occurring and therefore minimise the likelihood of a pollution incident.

- Regular inspection of the integrity of chemical bundling, pipelines, containers, and workshop areas BRWF to identify any potential for an incident due to wear and tear or physical damage on a regular basis. This combined with regular maintenance helps to minimise the likelihood of an incident.
- Staff Training in the storage and handling of liquids, clean-up of spills and emergency procedures helps to minimise the likelihood of an incident occurrence and prevents a small issue escalating into an incident.

BRWF operates using a comprehensive Environmental Management System and Safety Plan. These plans help to ensure that BRWF operations are undertaken with full consideration and management of the risks involved and ensures that we operate in a planned, practiced way using correct standards and procedures.

4 Actions to be taken during and immediately after a pollution incident

4.1 Actions to be taken during a pollution incident

In the event of a pollution incident the following actions will be taken:

1. Assess the pollution incident and raise the alarm
2. Stop all work in the affected area.
3. Ensure the safety of all workers, visitors in the vicinity of the spill/ leak.
4. Conduct a short assessment of the affected area, including:
   - Type of substance
   - Quantity of substance spilled
   - Location and potential impact on the environment, and the health and safety of personnel
   - Can the spill be managed by people and resources on site? Or are emergency services needed?
   - Is a site evacuation needed?
5. Immediately notify a BRWF S1 Key Contact (Table 8) of the above information. Refer to Section 4.3 for further information regarding internal notification requirements.
6. If an evacuation is required, follow site evacuation procedures within the Emergency Management Plan.
7. If evacuation is not required, the area shall be isolated and segregated to prevent personnel coming in contact with the incident.
8. If the incident is not manageable and presents an immediate danger to people, property, or the environment, immediately contact Emergency Services (000), Regulatory Authorities (Table 9) and potentially affected neighbours (Table 10).
9. If the incident does not require Emergency Services, but threatens or has caused ‘material harm’ to the environment (Section 4.3), people or property, immediately contact the Regulatory Authorities (Table 9), and neighbour notification as required (per Section 4.5).
10. If the incident is manageable, and it is safe and possible to do so, proceed to implement the spill management actions below.

4.1.1 Spill management actions

1. Ensure Personal Safety.
2. Wear standard PPE (e.g. gloves, safety glasses, long sleeves, trousers, closed shoes).
3. If in doubt consult the SDS for additional PPE requirements.

4. Control the source / stop the leak, by:
    - Putting the lid on
    - Turning the container upright
    - Turning off machinery
    - Plugging the hole if possible.
5. Contain and limit the spread of the spilled substances, by:
    - Using spill kit materials to contain the spill (eg. absorbents, granules, pads, socks etc)
    - Using available resources to contain the spill (eg. dig a hole to contain the spill, create a dirt bund, use sand-bags).
6. Protect drains and other pathways of escape:
    - Block entrances to stormwater drains
    - Place additional containment controls downslope of the spill to limit spread
    - Ensure the spilled substance is not spread or exacerbated by the prevailing or forecast weather conditions such as wind or rain. Diversion bunds or drains may be required to divert surface water runoff away from the spill, or coverings may be required to prevent further spread due to wind or rain impacts.
7. Undertake clean-up and reporting actions described in Section 5.
8. Resupply and restock any emergency equipment (e.g. spill kits) expended during the incident.

4.2 Consultation of the SDS

GE Energy is responsible for updating the list of SDS, as such consult with GE for the current list. If the pollution incident involves the use of a product for which an SDS is available then upon notification of a pollution incident, and if practicable, the SDS shall be consulted to obtain information to help in the management of the incident which may include recovering the product and performing the clean-up. In certain instances, specialised outside help may be needed. The SDS will also provide information on the appropriate PPE to be worn if it is decided to approach the release.

4.2.1 Spill response team roles

To facilitate an effective coordination of an incident or spill management, the spill response team should consider allocating the following roles:

Table 7: Spill response team roles

Category	Role/
Safety	Ensure PPE is worn. Manage Traffic, Fire, Injury
Information	Coordinate and give instructions to the response team Notify SQE Operations Manager Get SDS (if needed) Take photos and notes of the spill response Prepare the incident report
Spill handler	Obtain and use spill kits and other materials to control the spill

4.3 Notification of BRWF S1 key contacts

After a pollution incident has occurred, it must be immediately notified to BRWF Site Management personnel and relevant BRWF S1 Key Contacts in Table 8.

The Key Contacts listed in Table 8 BRWF Key Contacts are responsible for activating this plan. These persons are responsible for determining whether a pollution incident has caused or threatens “Material Harm” to the environment (see Section 1.3).

To facilitate and streamline information sharing between the BRWF S1 Key Contacts and any others, consider establishing a dedicated communication channel (e.g. Teams Chat or group email) to share incident status, questions and decisions. The Operation Manager would be responsible for setting up the communication channel, and determining the contact list.

Notification of Material Harm to the Relevant Authorities is the responsibility of BRWF S1 Key Contacts.

In the absence of a BRWF S1 representative being on site, then the GE Site Supervisor or Operation Manager will inform CWP directly of an incident so that the appropriate notification can take place.

Table 8 BRWF Key Contacts

Key contact	Position	Contact details (24hrs)
David Laing	Operation Manager (SQE)	0427 786 322
Zeina Jokadar (SQE)	Environmental Advisor	0476 882 365
Ben Deer	Operations Manager (SQE)	0429 071 864
Candice Somerville	Environment Manager (SQE)	0432 323 919
Sam Herbert	Service Site Supervisor (GE)	0439 519 273
Chris Kable	Lead Wind Service Technician (GE)	0419 923 320

4.4 Notification of Regulatory Authorities

Notifications to the appropriate regulatory authorities is the responsibility of Squadron Energy. In the absence of a CWP representative being on site, then the Contractor representative on site will inform the next available person on the Key Contact list (Table 8) directly of an incident so that the appropriate notification can take place.

If a SQE Representative from Table 8 cannot be reached, then a GE representative will notify Regulatory Authorities.

The following protocol will be followed for notification of pollution incidents:

1. Call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, NSW Police and NSW Ambulance Service are the first responders and responsible for providing emergency assistance.
2. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the order below in Table 9.

Table 9 Regulatory Authorities - order of contact in case of material harm to the environment

Regulatory Authority	Key contact	Contact Details
Environment Protection Authority	EPA Environment Line Queanbeyan Office	131 555 (02) 6229 7002

Regulatory Authority	Key contact	Contact Details
Department of Planning Housing and Infrastructure	DPHI Compliance 24-hour line	1300 420596 #2
SafeWork NSW		131 050
NSW Ministry of Health via Goulburn Public Health Unit (PHU)	Goulburn PHU	(02) 4824 1837 Poisons Hot Line 1 31 126
Snowy Monaro Regional Council council@snowymonaro.nsw.gov.au		1300 345 345
Fire, Police, Ambulance (fire unit required)		000
Fire and Rescue (no fire unit required)		1300 729 579

The information that is required to be notified is as follows:

a) The time, date, nature, duration and location of the incident,

b) The location of the place where pollution is occurring or likely to occur,

c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,

d) The circumstances in which the incident occurred (including the cause of the incident),

e) The action taken and proposed to be taken to deal with the incident and any resulting pollution or threatening pollution, if known,

f) Any other information prescribed by regulations.

Notification is required immediately. Any information required that is not known at the time of the incident can be notified when it becomes known.

A form to record the details of the notifications is provided in Appendix 3.

4.5 Notification of host properties and neighbours

Neighbours will be contacted directly via phone in the event of a pollution incident, if there is risk of harm to their safety or property. The method of communication will depend on the pollution incident and the actions required to reduce human health and environmental impacts. Updates will be provided to the relevant neighbour(s) as required. Table 10 provides details of the landowners and closest neighbours to the site and Figure 3 displays the corresponding properties and locations of residential dwellings.

Table 10 Landowner and neighbour contact details

Property	Status	Key Contact	Contact Details
‘Coopers Hill’ 659 Bungarby Rd Bungarby NSW 2630	BRWF Landowner	Mark Constance	mrkconstance@gmail.com
'Boco’, ‘Riverside’ Boco Road Nimmitabel NSW 2631	BRWF Landowner	William (Bill) Garnock	0428 536 244
‘Sherwood’ Boco Road Nimmitabel NS 2631	BRWF Landowner	C & M Garnock	0428 536 244
‘Brooklyn’	BRWF Landowner	John Bridgewater & Family	0438 678 367

Property	Status	Key Contact	Contact Details
Boco Road Nimmitabel NS 2631			
'Driftwood'	BRWF Landowner	Victoria Bridgewater	0409755803
'Kingwater'	BRWF Landowner	Victoria Bridgewater	0409755803
'Old Springfield' 1975 Springfield Rd	BRWF Landowner	George Haylock	02 6454 6096
'Avonlake'	BRWF Landowner	Roger Haylock	02 6454 6336 0428 546336
'Springfield' 2079 Springfield Rd Cooma NSW 2630	BRWF Landowner	Jim and Vicky Haylock	02 6454 6250 0400275820
Lot 6 Springfiled road Springfield NSW 2630	BRWF Landowner	Melanie Haylock	02 64546069
'Roselea' 1401 Springfield Rd Nimmitabel NSW 2631	BRWF Landowner	John and Leanne Jardine	02 6454 6214 0421 282 088
'Rockybah' 2079 Springfield Rd Cooma NSW 2630	BRWF Landowner	Michael Findlay	0412 101 114
'Nestlebrae'	BRWF Landowner	Albert Tory	0403 660 265
Lot 1, DP571796	BRWF Landowner	Sean O'Neill	02 6456 2345 0412 530 550
'Kenilworth' Springfield Road	BRWF neighbour	Stephen and Joanne Rolfe	02 6454 6334 0417 234 673
'Kelton Plain'	BRWF neighbour	Mark McGufficke	02 6452 3686
'Mountain View'	BRWF neighbour	John Alcock	02 6453 6244
Arthella Investment Pty Ltd	BRWF Landowner	Mick Findley	02 8088 0720 0412101114
'Bungee'	BRWF neighbour	Ronald Johnson	N/A
'Tinberry lodge'	BRWF neighbour	A Southgate, C Cassilles	N/A

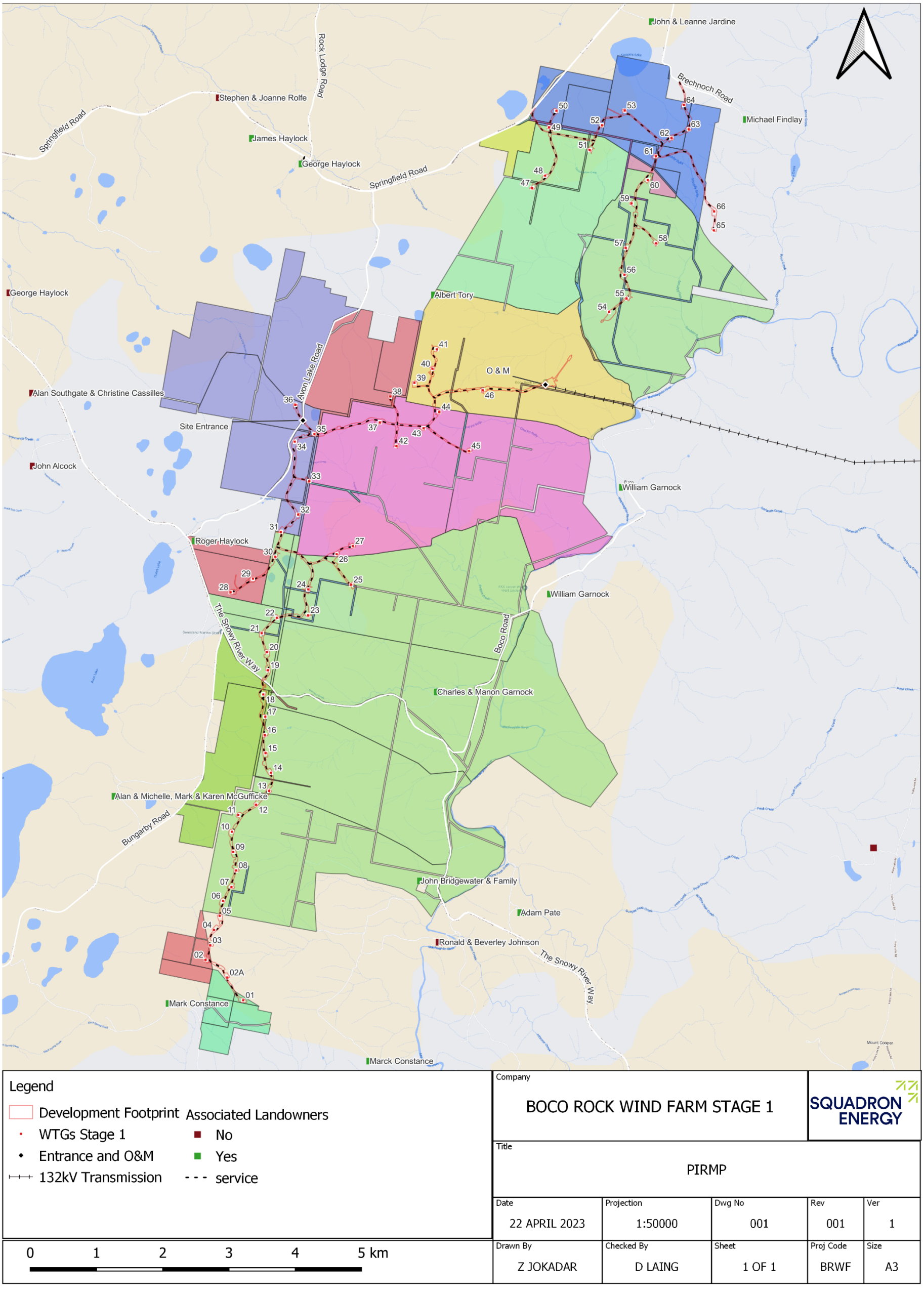

Figure 3 Residences located near the project

5 Actions following a pollution incident

5.1 Remediation

Following a pollution incident key personnel, as identified by the Operation Manager, will develop a remediation plan (clean-up and recovery). The remediation action plan would include the following:

1. Steps to be taken to clean and re-instate the site
2. Roles and responsibilities for each step
3. Estimated time/schedule to complete each step
4. Estimated costs for each step
5. Method to evaluate/determine when the remediation has been completed successfully.

The following should be considered during the preparation of the remediation plan:

- It may be possible to undertake clean-up of minor pollution incidents using resources on site.
- For some incidents, a suitable external contractor may need to be engaged to provide the necessary equipment and materials (e.g., an earthmoving and transport contractor). Depending on the situation, clean up may require the engagement of emergency services or professional clean-up crews with breathing apparatus and sophisticated recovery plant.
- Spill kits and other materials used during a pollution incident should be restocked as soon as possible.

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5.2 Incident reporting

5.2.1 Internal reporting

In the event of an incident, the Operation Manager will undertake a comprehensive investigation of any pollution incident event and complete an incident report. The incident report template is available on the SQE EMS Sharepoint Page. The incident will be recorded in the SQE Incident Register with corrective actions generated as required.

5.2.2 External reporting

If a pollution incident has been notified to the EPA, the notification must be followed up by a **written notification within 7 days of the date on which the incident occurred**, in accordance with Condition R2.2 of the EPL 20434, Section 137 of the POEO Regulation. Immediate notification to DPHI must be provided via the portal pursuant to condition 4.12 of State Approval 09_0103 Mod1. A Squadron Energy representative will be responsible for providing this written notification to the EPA.

In accordance with Section 150 (1) of the POEO Act, the relevant information to be provided in the written report includes:

a) The time, date, nature, duration and location of the incident,

b) The location of the place where pollution is occurring or likely to occur,

c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,

d) The circumstances in which the incident occurred (including the cause of the incident),

e) The action taken and proposed to be taken to deal with the incident and any resulting pollution or threatening pollution, if known,

f) Any other information prescribed by regulations.

5.2.3 Additional External reporting

Pursuant to condition R3 of the EPL, the authorised officer of the EPA may request an additional report if the EPA suspects the event has caused material harm to the environment. This report should include the information outlined in condition R3.3 of the EPL, and the report should be provided to the EPA within such time as may be specified in the request.

R3.3 requires:

a. The cause, time and duration of the event;
b. The type, volume and concentration of every pollutant discharged as a result of the event;
c. The name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d. The name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e. Action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f. Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g. Any other relevant matters.

Pursuant to Condition 4.12 of the NSW Conditions of Consent, subsequent to the initial notification, reports must be submitted in accordance with the requirements set out in Appendix 3. Table 11 outlines the reporting requirements

Table 11 Summary of reporting requirements pursuant to condition 4.12

Timing	Information to be provided via the Planning Portal
Within seven days after the Proponent becomes aware of an incident	a. Identify the development and application number b. Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident) c. Identify how the incident was detected d. Identify when the proponent became aware of the incident; e. Identify any actual or potential non-compliance with conditions of approval f. Describe what immediate steps were taken in relation to the incident g. Identify further action(s) that will be taken in relation to the incident; and h. Identify a development contact for further communication regarding the incident.
Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary	The Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested
	a. A summary of the incident; b. Outcomes of an incident investigation, including identification of the cause of the incident; c. Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. Details of any communication with other stakeholders regarding the incident.

6 Training

The following training will be undertaken to ensure that the PIRMP is well understood and that all staff are familiar with the requirements of the plan and the key steps to manage a pollution incident:

- The requirements of the PIRMP will be included as part of the Site Induction process for all staff working on the BRWF S1 regardless of their employer.
- All site personnel will be tool boxed on the requirements of the PIRMP and what their obligations are.
- At times, as determined by SQE, a spill response consultant may be engaged to deliver on-site PIRMP testing and training to key staff. Records of the training will be documented.

7 Access to the PIRMP

This plan will be kept on the premise to which the EPL relates. It will be kept in hard copy with the EPL at the Operations and Maintenance Building. A copy of the PIRMP agency notification sheet and EPL will be placed on the BRWF S1's web page.

The PIRMP will be accessible to anyone who has the legal authority to view in accordance with the provisions of the POEO Act.

8 Testing of the PIRMP

This PIRMP must be tested annually (at least once in any 12-month period) and within one month of any pollution incident occurring at BRWF Stage 1.

Testing must cover all components of the PIRMP, including effectiveness of training. Testing of the PIRMP can be done in the following ways:

- A desktop review of the plan to ensure that the information is accurate and up to date. Any desktop exercise would include working through an incident scenario to ensure the PIRMP is effective.
- A practical exercise or drill to simulate one of the potential incidents identified within the risk assessment in Appendix A.
- Following an actual pollution incident requiring activation of the plan; a debrief with key personnel can be conducted, within 1 month, to assess whether:
  - the PIRMP was implemented efficiently during the activation.
  - there were areas of the PIRMP that did not work or could be improved.
  - all contact details were correct and up-to-date.
  - maps were accurate and sufficiently detailed.
  - any other details in the PIRMP need to be updated.

Only reviewing and updating the contact details in a PIRMP does not constitute testing the PIRMP. Similarly, activation of the PIRMP in response to a pollution incident is not considered a test of the PIRMP, unless a de-brief has also been conducted as described above.

The results of all testing of the PIRMP should be recorded in detail and summarised below in Table 11.

Table 12 Register for recording PIRMP testing

Date of Test	People Involved	Comments/Outcomes	Modification to PIRMP
Monday, 15th February 2021 **Test undertaken following an actual pollution incident that occurred on 3rd Feb 2021**	Alana Gordijn Mariana Pais Soto Matthew Jackson Adam West	Pollution incident de-brief meeting and PIRMP review record	Document distribution list added to document. Update Figure 1 – Site Layout to include Spill kit locations at WTGs. Further definition of trigger for notification of authorities. Identify key environmental project contacts. Develop call list for recording details of external authorities/communities and include in appendix.
Friday 11 March 2022	James McNamara David Laing	Annual desktop test of PIRMP	Update key contact information. Update Landholder and Neighbour contact details. Provide updated hardcopies of the PIRMP to be made available in site office, substation and maintenance shed.
Thursday 21 April 2022 **Test undertaken following an actual pollution incident that occurred on 26 March 2022.**	James McNamara David Laing	Pollution incident de-brief meeting and desktop PIRMP review record	Update Regulatory Authority contact list. Update Pollution Incident Notification Record Form contact details. Removal of Department of Planning, Industry and Environment notification as not a legal requirement.
19/04/2023	Zeina Jokadar David Laing	Annual desktop test of PIRMP	Specified this PIRMP is for Stage 1 of BRWF Added conditions for entry prior to determining material harm Added group communication procedure Updated section references in documents Updated landowner contacts and map
25/10/2023	Zeina Jokadar David Laing	Pollution incident de-brief meeting and desktop PIRMP review record	Updated additional reporting requirements to the DPHI as per the NSW Mod1 approval. Updated section 4.2.1 and health ministry contact number. Added flow chart and contacts to start of document for ease of access.
01/10/2024	Zeina Jokadar David Laing GE staff	Annual test – simulation Response training by Renew Solutions	General document updates including addition of SF6 gas risks and controls, definition of Activation of the PIRMP, replacing clean-up and recovery with remediation plan description. Update risk matrix. Update Key contact details.

Appendix A Pollution incident risk assessment

A risk assessment has been undertaken by Boco Rock Wind Farm Pty Ltd. The primary objectives of the risk assessment were to:

- Use the risk assessment to identify key environmental issues to be addressed in the PIRMP.
- Use a risk assessment as input into the preparation of control measures for wind farm operation;
- Prioritise identified environmental risks through a risk ranking process;
- Identify recommended actions to minimise or reduce risk; and
- Document the process and the results

The review process was based on the framework detailed in ISO 31000:2009 Risk Management - Principles and guidelines. The main tasks in the process were:

1. Context – Scope, Background “What is the study area and why are we doing this?”
2. Identify – Brainstorming, Modified Hazard and Operability Study (HAZOP), etc.
3. Analyse – Available data – “How big is the problem?”
4. Assess – Priority setting – “What are the Critical Issues?”
5. Assess – Risk Ranking – “What is the combination of consequence and likelihood?”
6. Treat – Control analysis – “A solution.”
7. Monitor & Review – Action items and inclusion of Risks and Treatment Strategies in Risk Management plans.

The identified risks were then assigned a probability and a consequence rating according to the ratings outlined in Table A1 – Probability Considerations and Table A2 – Consequence Ratings. These probability and consequence considerations were then assigned a risk in accordance with Table A3 – Risk Ranking Table.

Table A1 - Probability Considerations

Likelihood	
Almost certain	Almost certainly will occur
Likely	Is likely to occur in the current of future environment
Possible	Will possibly occur in the current or future environment
Unlikely	Is unlikely to occur in the current or future environment
Rare	May occur in rare circumstances only

Table A2 - Consequence Ratings

Consequence	
Catastrophic	Widespread catastrophic impact on environmental values of an area
Major	Widespread substantial impact on environmental values of an area
Moderate	Widespread and considerable impact on environmental values of an area
Minor	Localised and considerable impact on environmental values of an area
Insignificant	Minor impact on environmental values of an area

Table A3 - Risk Ranking Table

Likelihood	Consequence				
	Insignificant	**Minor**	**Moderate**	**Major**	**Catastrophic**
Almost certain	Medium (5)	High (10)	High (15)	Extreme (20)	Extreme (25)
Likely	Medium (4)	Medium (8)	High (12)	High (16)	Extreme (20)
Possible	Low (3)	Medium (6)	Medium (9)	High (12)	High (15)
Unlikely	Low (2)	Medium (4)	Medium (6)	Medium (8)	High (10)
Rare	Low (1)	Low (2)	Low (3)	Medium (4)	Medium (5)

	Extreme - Intolerable
	High – Too high & additional controls are needed
	Medium - As low as reasonably practical
	Low - Tolerable

Table A4 Risk Assessment – Examples of Pollution Incident Risks at BRWF S1 operational site

Work step or facility	Hazards	Risk	Risk Score	Mitigation Strategies (Control Measures)	Residual Risk Score	Control Measure Responsibility
Operation of and Maintenance of Wind Farm						
Transport	Fuel Spill	Reduction in water quality, Soil contamination	Medium	Classification, designated storage areas, Bunding, Spill Management Actions in the PIRMP, Spill control equipment	Low	Site Manager
Transport	Structural damage to road / culvert resulting in water pollution	Reduction in water quality, Soil contamination	Medium	Drive to road conditions; Ensure roads fit for purpose; Preventative maintenance on culverts; Guideposts and signage;	Low	Site Manager
Sewage transport	Onsite sewage spill	Reduction in water quality	Medium	Septic system approved by Council for operations. Checks on operation of systems. Fencing out of disposal areas	Low	Site Manager
Turbine Coolant system (320L per turbine)	Loss of chemical from coolers	Soil or water pollution	Medium (8)	Use of Biodegradable coolant. Regular inspections and maintenance. Procedure for top-up of coolant to avoid spills.	Low (3)	GE
Turbine oil and grease systems and servicing	Leak or spill of oil or grease	Contaminated soil or water	Medium (4)	Low volumes of oil. Inspections to detect leakage. Maintenance of plant.	Low (2)	GE
Erosion of disturbed ground	Soil erosion and sediment transfer / weeds	Intense rain event	Medium (9)	Effective erosion and sediment control. Stabilised all disturbed areas. Monitor areas that have been rehabiliated Routine weed management.	Low (3)	Operation Manager
Material storage	Fuel, oil, chemicals	Soil contamination	Medium (9)	Classification, designated storage areas. Bunding.	Low (3)	GE

Work step or facility	Hazards	Risk	Risk Score	Mitigation Strategies (Control Measures)	Residual Risk Score	Control Measure Responsibility
				Adoption of Spill Management Actions in the PIRMP. Access to spill control equipment.		
Waste Management	Oil, chemicals, rags, plastics, steel, wood, sewage, other	Soil contamination, amenity, visual	Medium (6)	Classification. Designated waste areas. Labelling., Recycling. Appropriate/legal transportation and disposal.	Low (3)	GE
Various	flooding causing pollution of water	flooding, spills, penalties	Medium (9)	Emergency Management Plan Installed and maintained erosion and sediment controls Designated chemical storage area and adjusting storage to be removed from areas prone to inundation	Medium (6)	Operation Manager
Various	Bushfire	Harm to life & property	Medium (9)	Fire Guideline in the EMP Fire-fighting equipment on-hand (especially for hot works) Contact RFS and enable site access to RFS Sensors and automated shutdown systems on turbines to enable aircraft waterbombing of surrounds and site Maintain internal access roads	Medium (6)	Operation Manager
Wind farm infrastructure	Equipment Fire	Ignition of bushfire. Harm to life & property	Medium (8)	Emergency Management Plan, including *Guideline 4: Fire.* Control ignition source. Sensors and automated shutdown systems on turbines. Fire-fighting equipment on-hand (especially for hot works). Contact RFS and enable site access to RFS Maintain internal access roads	Medium (4)	Operation Manager
Vehicle movements	Air borne dust	Roads poorly maintained	Medium (4)	Maintain road surfaces to limit dust generation when vehicles use road. Deploy water cart as required.	Low (3)	Operation Manager and GE

Work step or facility	Hazards	Risk	Risk Score	Mitigation Strategies (Control Measures)	Residual Risk Score	Control Measure Responsibility
				Reduce vehicle speeds. Consider application of surfactants.		
Access track maintenance	Erosion of tracks and adjacent land	Sediment transfer	Medium (6)	Higher risk on steeper slopes and erodible soils. Ensure drains are lined to reduce flow velocity and prevent scouring of drain. Stabilise batters. Rehabilitation Programme. Flocculate sediment basins.	Low (3)	Operation Manager
Turbine coolant storage (O&M) and other chemical storage	Damage to storage container	Spillage of coolant	Medium (9)	Stored in appropriate manner on designated bunding adjacent to storage shed at O&M Compound.	Medium (4)	GE
Herbicide use on disturbed area	Inappropriate use/ application	Spills, penalties	Medium (6)	Handling procedures. Contractor applying herbicides to be appropriately trained and certified. Review weather forecast prior to application.	Low (3)	Operation Manager
Sewage system on-site	Failure of pipework	Reduction in water quality, Soil contamination, penalties	Low	Septic system approved by Council for operations. Checks on operation of systems.	Low	Operation Manager
Operation and maintenance of substation						
Transformers	Loss of large oil volume	Soil or water pollution	Medium (8)	Design includes location within substantive concrete bund and inground oil/water separator, and secondary containment tank. Regular inspection and maintenance.	Low (3)	GE
Oil water separator	Ineffective operation	Oil discharges to soil and waters	Medium (9)	Regular inspection and maintenance. Keep clean.	Low (3)	Operation Manager

Work step or facility	Hazards	Risk	Risk Score	Mitigation Strategies (Control Measures)	Residual Risk Score	Control Measure Responsibility
Transformer oil cleaning	Leakage/loss of large oil volume	Soil or water pollution	Medium (9)	Established maintenance procedure undertaken by contractors. Adequate controls put in place during activity.	Medium (4)	GE
Switchgear maintenance	SF6 or nitrogen gas leak	Pollution to air	Medium	Regular inspections and maintenance Inspections to detect leakage (gauges and alarms) Procedure for replacing/re-filling gas	Low	GE
Hazardous substance storage	Storage of waste oil and chemicals	Spillage to soil or waters	Medium (8)	Storage of relatively small amounts of hazardous substances, oils and chemicals. Appropriate bunding of stored materials.	Medium (4)	GE
Waste	Inappropriate disposal	Pollution, fines, penalties	Medium (6)	Minimal waste during operations. Clearly defined waste handling processes. Separation of wastes. Use of licensed waste contractor.	Medium (4)	GE
Emergency situation i.e. fire, electrical malfunction etc	Fire	Oil leaks	Medium (8)	Follow requirements of Emergency Management Plan.	Medium (4)	**Operation Manager and GE**

Appendix B Pollution Incident Notification Record Form

Material Harm Pollution Incident - Notification Record

For Boco Rock Wind Farm EPL 20434

Date of Incident	
Start time of incident	***Start time (when incident occurred):***
Who was involved	
Brief overview of incident (include: time, nature, duration, volume and location of the incident)	
Date and Name of person making notification	***Date of notifications:*** ***Name:***

Relevant Authority		***Additional Notes***
Environmental Protection Agency – 131 555		
Time called		
Reference Number		
Name		
Position		
Email		
NSW Department of Planning, Housing and Infrastructure 1300 420596 #2		
Time called		
Reference Number		

Name		
Position		
Email		
NSW Ministry of Health (Goulburn Public health unit) – (02) 4824 1837		
Time called		
Reference Number		
Name		
Position		
Email		
SafeWork NSW – 131 050 ***Advise it is a Pollution Incident and provide the EPA reference number***		
Time called		
Reference Number		
Name		
Position		
Email		
Snowy Monaro Regional Council – 1300 345 345		
Time called		
Reference Number		
Name		
Position		
Email		
Fire and Rescue NSW – 1300 729 579		
Time called		
Reference Number		
Name		
Position		
Email		

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past , present, and emerging.

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