Boco Rock Wind Farm

Pollution Incident Response Management Plan
EPL 20434

19/03/2026

Document Control

Boco Rock Wind Farm

Pollution Incident Response Management Plan EPL 20434

Revision

8

Revisions

Rev	Date	Details	Prepared By	Reviewed By	Approved By
1	08/03/21	General document update	M Pais Soto	A Gordijn	Jose Fortes
2	31/01/22	Inclusion of flooding incidents	J McNamara	M McGuire	M McGuire
3	11/03/22	General Document update and Annual Test	J McNamara	D Laing	D Laing
4	21/04/22	General Document update	J McNamara	D Laing	D Laing
5	24/04/23	PIRMP desktop test and general doc review. Convert to SQE template	Z Jokadar	D Laing	D Laing
6	25/10/23	Update of Document following Spill Incident	Z Jokadar	D Laing	D Laing
7	04/10/24	Annual PIRMP test-Practical and update Plan	Z Jokadar	D Laing	D Laing
8	19/03/26	Updated contact details to Tilt Renewables contacts Converted to Tilt Renewables template	E Lewis	L Townsend	D Owen

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Contents

1 Introduction

1.1 Purpose of the 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

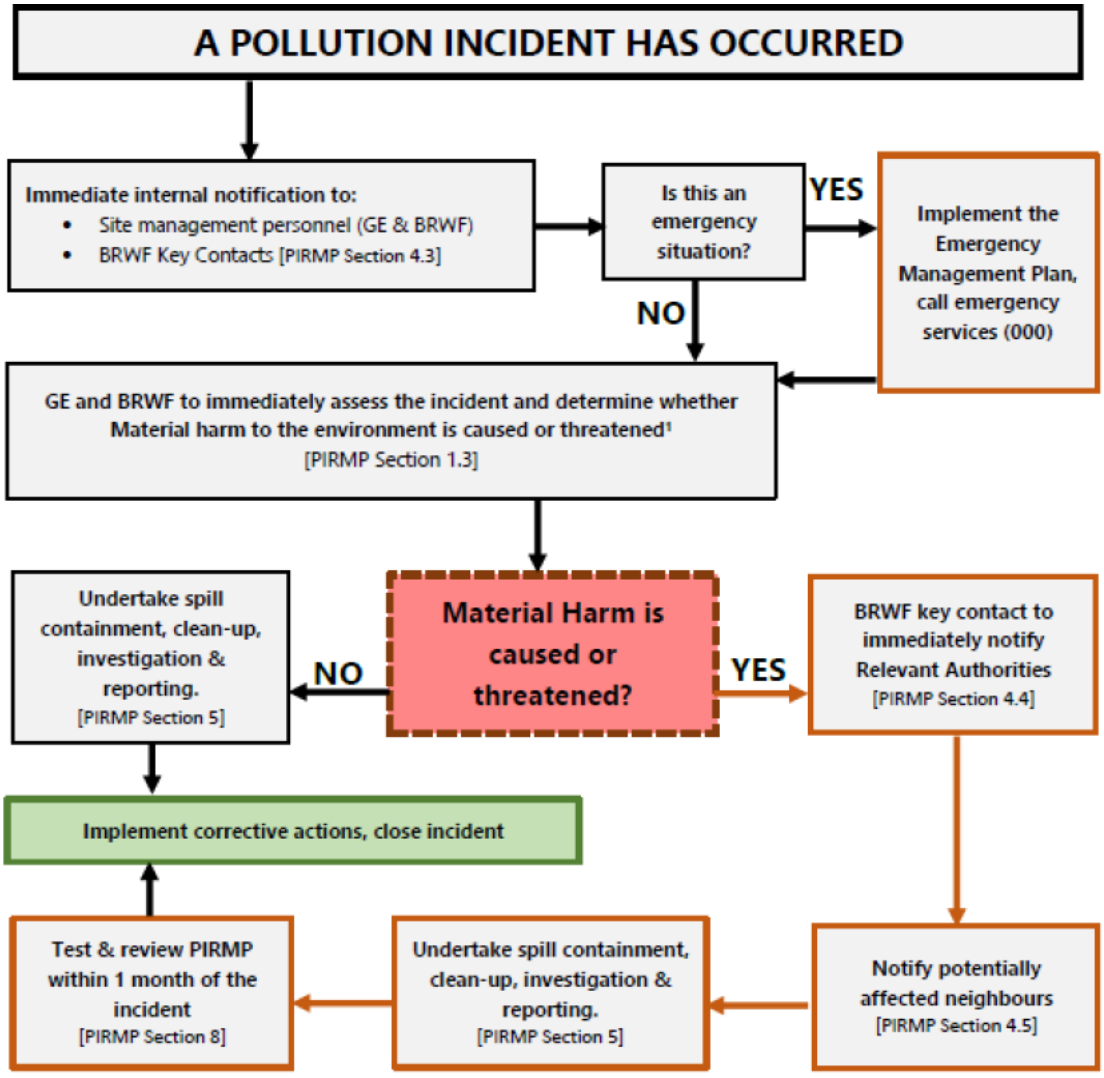

Figure 1 Flowchart for pollution incident immediate response, assessment of Material Harm & notifications

1.4 Legal requirements for the PIRMP Definition of pollution incident

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	BRWF Environmental Risk Register
72 b	The likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood	BRWF Environmental Risk Register
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
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	BRWF Environmental Risk Register
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 licences

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 Tilt Renewables Pty Ltd.

WTG maintenance services are subcontracted by BRWF Pty Ltd 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 Asset Manager immediately.
7. Reporting all incidents, near misses and hazards to the BRWF S1 Asset Manager immediately.
8. Ensuring full compliance with instruction and training provided by Tilt Renewables 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 Asset 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.

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: Requirements for a PIRMP, Section 153C POEO Act

Hazard	Requirement
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. Fire 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 located on Tilt Renewables sharepoint system. 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

Hazard	Requirement
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
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 Prevent risk of harm

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; •
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 5 Other pollution control measures

Product	Location on site	Purpose
Spill Kits	Operations, maintenance facility and substation Inside tower of selected WTGs 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. 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 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

Steps to follow in the event of a spill:

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.

4.3 Notification of 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 Asset 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 Asset 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
Clive Londt	Asset Manager	0437 636 192
Daved Owen	Environmental Compliance Manager	0484 061 711
Lloyd Townsend	Environmental Compliance Advisor	0456 606 746
Margaret Fox	Head of HSE	0407 148 431
Sam Herbet	Site Supervisor	0439 519 273
Chris Kable	Lead Technician	0419 923 320

4.4 Notification to Regulatory Authorities

Notifications to the appropriate regulatory authorities is the responsibility of Tilt Renewables. In the absence of a Tilt Renewables 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 Tilt 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 Regulator Contacts

Authority	Contact details
EPA	131 555 (02) 6229 7002
DPHI	1300 420596
SafeWork	131 050
Sam Herbet	0439 519 273
Chris Kable	0419 923 320

NSW Ministry of Health via Goulburn Public Health Unit (PHU)	(02) 4824 1837
Police, Fire, Ambulance	000
Fire and Rescue	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.

4.5 Notification to landholder 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.

Tilt will utilise the Borealis system for landholder and neighbours contact details.

5 Actions following a pollution incident

5.1 Remediation

Following a pollution incident key personnel, as identified by the Asset 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.

5.1.1 Incident reporting

In the event of an incident, the Asset Manager will undertake a comprehensive investigation of any pollution incident event and complete an incident report. The incident will be recorded in the Tilt CAMMS HSE management system with corrective actions generated as required.

5.1.2 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. Tilt Environmental Compliance Team will be responsible for reporting 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.

5.1.3 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 Table 10.

Table 10 Summary of reporting requirement 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 Tilt Renewables, 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 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.
- 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.

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