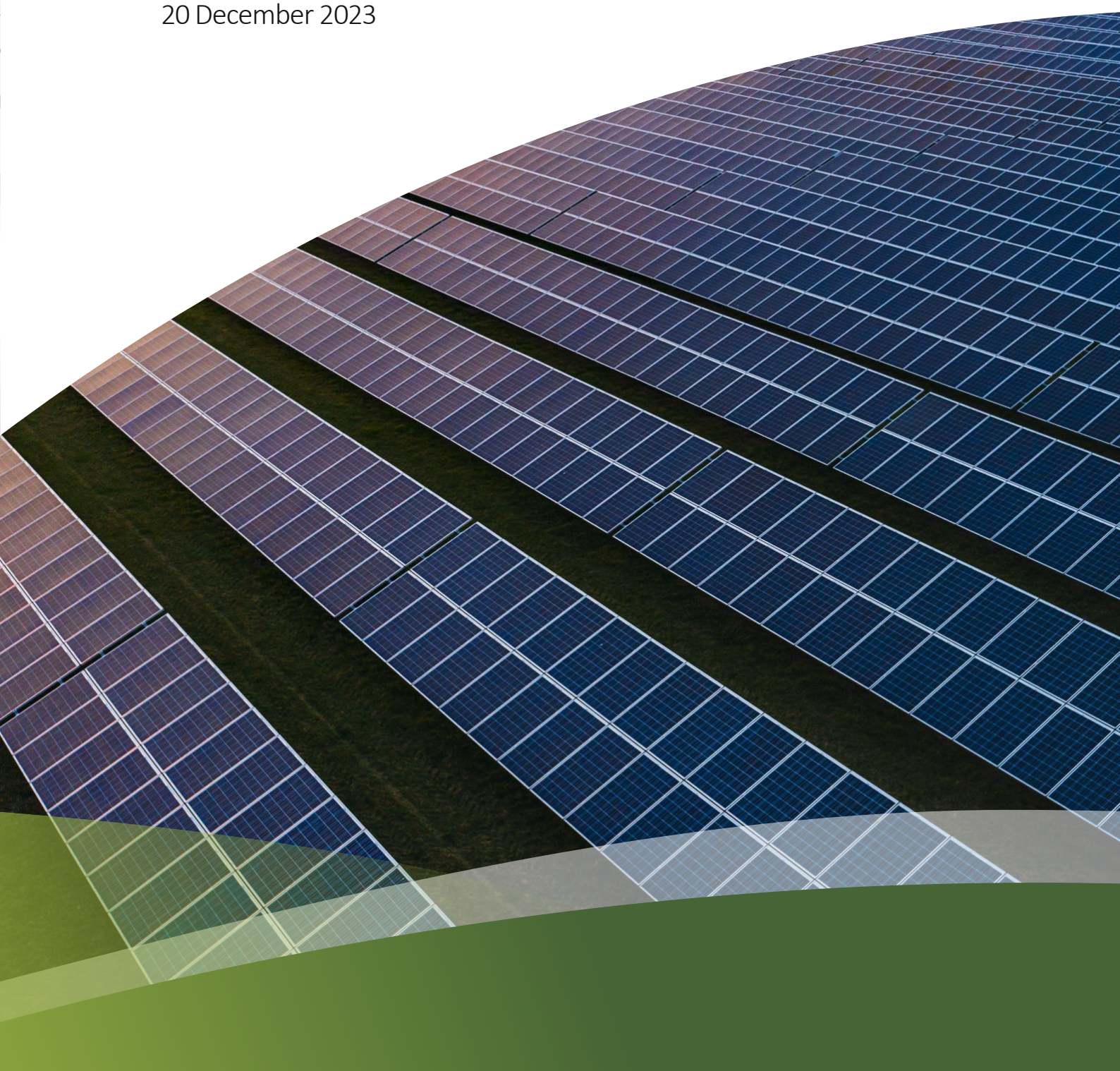
Spill Response Plan

Gunsynd Solar Farm

20 December 2023



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Gunsynd Solar Farm

AE1247

December 2023

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Issued to:			
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Contents

Tables

Abbreviations

DN	decision notice
GHS	Globally Harmonized System of Classification and Labelling of Chemicals
Gunsynd SF	Gunsynd Solar Farm
HSE	health, safety and environment
Metis Energy	Metis Energy Ltd
PCL	PCL Constructors Pacific Rim Pty Ltd
PPE	personal protective equipment
SDS	safety data sheet (for chemical use)
Site EMP	Site Environmental Management Plan

1 Purpose

The aim of the plan is to minimise the potential for contamination sources to be present at the site and to release contaminants into the environment and describes the requirements for on-site management of leaks of fuel/oil/etc. from vehicles and plant that are used at the site. By following the processes described the contaminant impact to environment will be minimised.

This plan, together with the associated documents listed below, helps to ensure that release of contaminants into the environment is minimised. The associated documents are:

- Spill-kit Location Plan – Gunsynd Solar Farm (Attachment 1)
- Environmental Compliance Inspection Checklist (Attachment 2)
- Incident Investigation Form (Attachment 3).

2 Scope

This plan applies to PCL Constructors Pacific Rim Pty Ltd (PCL) Gunsynd Solar Farm (Gunsynd SF) project. It applies to the release of fuel/oil/etc. from vehicles and plant that are used at the site – a source of contaminants that could reasonably be anticipated to potentially contribute to on-site contamination.

The plan describes the processes that must be performed on vehicles and plant used at the site to prevent and react to spills and leaks. The items to which this plan applies includes:

- spill prevention
- spill detection
- spill clean-up
- disposal of clean-up material.

3 Definitions

Non-conformance – a failure to meet one or more of the existing requirements

Egnyte – PCL's Project Management System online platform

Hammertech – PCL's HSE management system online platform

4 Roles and responsibilities

Roles and responsibilities for Metis Energy Ltd (Metis Energy), PCL personnel and subcontractors are detailed in Section 4 of the Site Environmental Management Plan (Site EMP).

These roles and responsibilities include:

- complying with the Planning Permit Decision Notice (the DN), Australian Standards, as well as State and Commonwealth legislation
- implementing the response, management and monitoring measures of the Spill Response Plan (as a subplan to the Site EMP)
- PCL also has an emergency response plan that should be consulted.

5 Health and safety information

All environmentally hazardous materials, including all chemicals, fuels, and oils, held on site should be stored and handled in accordance with PCL's Globally Harmonized System of Classification and Labelling of Chemicals (GHS) training document is to be completed by all supervisors and workers that are monitoring products/materials arriving to site. This system conforms with the Australian Standard AS1940-2017: The storage and handling of flammable and combustible liquids.

All spills will be immediately controlled, contained, cleaned up and reported as an incident, with adequate spill-kits available to be used in accordance with safety data sheet (SDS) recommendations.

Appropriate, task-specific personal protective equipment (PPE) should be worn by all personnel involved in the procedure and its tasks. Standard PPE that should be worn includes:

- long-sleeved shirt and long trousers
- hard hat
- hi-vis vest
- steel-capped boots
- eye protection
- appropriate gloves
  - cut-resistant (rigger-type) gloves when handling vehicles, vehicle components, etc.
  - PVC or nitrile gloves when handling contaminated material.

6 Procedures

All environmentally hazardous materials, including all chemicals, fuels, and oils, held on site should be stored and handled in accordance with the Australian Standard *AS1940-2017: The storage and handling of flammable and combustible liquids*, or its latest version.

6.1 Overview of procedure

An overview of the Spill Response Procedure is presented in Table 6.1.

Table 6.1 Procedure responsibility

Procedure	Responsibility
Spill-kit placement	PCL Lead project manager/operations and maintenance site supervisor
Safety data sheets	PCL Lead project manager/operations and maintenance site supervisor
Spill prevention	PCL Lead project manager/operations and maintenance site supervisor
Spill detection, clean-up and disposal of clean-up material	PCL Lead project manager/operations and maintenance site supervisor

6.2 Components of each procedure

Two key procedures (the procedures for spill prevention and for spill detection) have a number of elements and tasks that need to be performed to complete the procedure. They are listed in Table 6.2.

Table 6.2 Components of each procedure

Task	Definition
Purpose of task	Describes what the task is for
Frequency of task	Sets out the task frequency
Who can do the task	Describes who can carry out the task
What to look for	Describes what elements should be considered during the task
What to do	Describes what actions should be implemented from the task
What are the health, safety and environmental requirements	Describes what PPE should be worn

Task	Definition
What to report	Describes how the task and consequent actions are to be reported

6.2.1 Spill-kit placement

Spill-kits are an important method of preventing spills of potentially-harmful chemicals being dispersed into the environment. The spill-kits on site should contain the following:

- protective clothing (gloves, overalls, overshoes, safety goggles)
- absorbent materials (paper towels, spill pads, spill socks)
- disposal bags with tape or twist ties
- dustpan and polypropylene broom
- container for waste.

PCL will position spill-kits at the site and stored in strategic locations designed to be deployed in the event of a spill. The locations of the spill-kits are shown on Attachment 1.

6.2.2 Safety data sheets

Storage and handling of hazardous substances will be in accordance with the SDSs. PCL and its subcontractors will maintain an up-to-date SDS Register, including a risk assessment, and copies will be kept at all storage locations and at the first aid facilities and soft copies located within the PCL health, safety and environment (HSE) platform Hammertech. All hazardous substances will be labelled. Incompatible materials will not be stored together.

The SDS Register will be managed by PCL's HSE Supervisor.

6.2.3 Spill prevention

Purpose

The regular inspection and maintenance of plant and vehicles, is a crucial component of spill prevention and, therefore, of minimising the risk of impact to the environment.

Regular inspections of valves, pumps, pipes and hoses should be carried out and preventative maintenance procedures should be implemented.

How often is inspection and maintenance performed?

Inspection and maintenance schedules for each vehicle and piece of plant are held by each Contractor. These schedules should be adhered to ensure vehicle and plant is well maintained and risks of spills and leaks are minimised.

Who can do the inspection?

Vehicle inspection and maintenance should be completed by an approved auto-mechanic.

Plant inspection and maintenance should be completed by an engineer/mechanic who is familiar with the particular plant and suitably trained in its maintenance.

What to look for?

Evidence of that components/systems of the vehicles and plant that contain fuel, oil or hydraulic fluid is wearing and may fail.

What to do?

If evidence of wearing or damaged fuel, oil or hydraulic fluid components/systems, the following should be considered:

- repair or replace damaged/worn components
- replace damaged plant and equipment.

What are the health, safety and environmental precautions?

It is important that personnel carrying out the clean-up actions take the necessary precautions to protect their health, the health of co-workers and the environment. These precautions include:

- Always wear appropriate PPE. This includes long-sleeved shirts and long trousers, gloves and eye protection complying to AS/NZ Standards requirements.
- Always consider manual handling hazards. Can necessary lifting or moving be performed by a mechanical device?
- Always consider slips and trips hazards. Ensure the work area is kept tidy and free of such hazards. Ensure areas identified as slippery (i.e. areas of oily or similar paving) is clearly marked and separated from the rest of the site.
- Place contaminated material (oil-soaked pads, used PPE, etc.) in correctly identified appropriate containers and dispose of appropriately using licensed contractors.

What to report?

Inspection and maintenance records should be kept for a minimum of three years.

The PCL HSE supervisor will manage these records, which will be kept on the PCL HSE management platform Hammertech.

6.2.4 Spill detection, clean-up and disposal of contaminated material

Purpose

The early detection of spills, their prompt clean-up and the appropriate disposal of contaminated materials, also manage the risk of impact to the environment.

How often is inspection performed?

Inspection vehicles and plant should be done each day.

Who can do the inspection?

The operators of each vehicle and piece of plant should conduct inspections and other staff should be trained in spill detection.

What to look for?

To detect leaks, vehicles and plant and their surrounds should be inspected:

- prior to the commencement of operation each day

- if a sudden or unexpected drop in oil/hydraulic pressure or fuel tank volume are noted
- if evidence of contamination is noted.

What to do?

If a leak or spill is detected, action the following:

- access the nearest spill-kit and use the materials as appropriate
- ensure necessary PPE is worn
- use standard operating procedures in the event of an on-site emergency
- isolate a tank or bund
- use fire-fighting equipment, if required
- ensure site vehicles and unnecessary pedestrian access to the spill site is prevented by the use of flagging/danger tape, bollards, etc.
- place spill socks and spill pads down-gradient of the spill to prevent contamination of the environment
- place spill socks and spill pads at the down-gradient perimeter to minimise the movement of the spill
- contain and soak up the spill with necessary absorbent materials from the spill-kit
- place contaminated material (oil-soaked pads, used PPE, etc.) in correctly identified appropriate containers
- dispose of contaminated material appropriately using licensed contractors

What are the health, safety and environmental precautions?

It is important that personnel carrying out the clean-up actions take the necessary precautions to protect their health, the health of co-workers and the environment. These precautions include:

- Always wear appropriate PPE. This includes long-sleeved shirts and long trousers, gloves and eye protection.
- Always consider manual handling hazards. Can necessary lifting or moving be performed by a mechanical device?
- Always consider slips and trips hazards. Ensure the work area is kept tidy and free of such hazards. Ensure areas identified as slippery (i.e. areas of oily or similar paving) are clearly marked and separated from the rest of the site.
- Place contaminated material (oil-soaked pads, used PPE, etc.) in correctly identified appropriate containers and dispose of appropriately using licensed contractors.

What to report?

When a spill is identified, an Incident Investigation Form is to be completed see Attachment 3 - PCL Incident Investigation Form should be completed after each incident.

- All items taken from spill-kits need to be replaced. Therefore, an inventory of these used items should be made and replaced at the earliest opportunity. All corrective actions need to be signed off by management.

The PCL HSE supervisor will manage these records, which will be kept on the PCL HSE management platform Hammertech.

7 Data and records management

Document management

The document is part of the site's environmental management system. The latest version of the plan should be made available to all necessary site personnel on the PCL Project management system "Egnyte".

Records management

Service and maintenance records should be completed and filed in a location that is accessible and retained for a minimum period of 3 years.

All completed Spill or Event Incident Reports must be filed with the site's document information system and retained for a minimum period of 3 years.

The PCL HSE supervisor will manage these records, which will be kept on the PCL HSE management platform Hammertech.

8 Quality assurance and quality control

8.1 Training

Responsibility for training

All site personnel using the procedure should be trained on its application, use and reporting requirements. The PCL Site Manager is responsible for ensuring all staff receive the necessary training.

Vehicle and plant inspection and maintenance

All personnel conducting vehicle and plant inspection and maintenance must be trained on their application, use and reporting requirements located within PCL's management platform, Hammertech.

Inspections and corrective actions

All site personnel conducting spill and leak detection inspections and corrective actions should be instructed as to what to look out for and how to implement outcomes of the inspection (including corrective actions).

PCL use several Compliance Inspection's to proactively review activities, plant and locations to ensure compliance. These forms are located and used within Hammertech system.

Training records management

All training record documents are scanned and saved to the PCL Hammertech system.

8.2 Maintenance of the Spill Response Plan

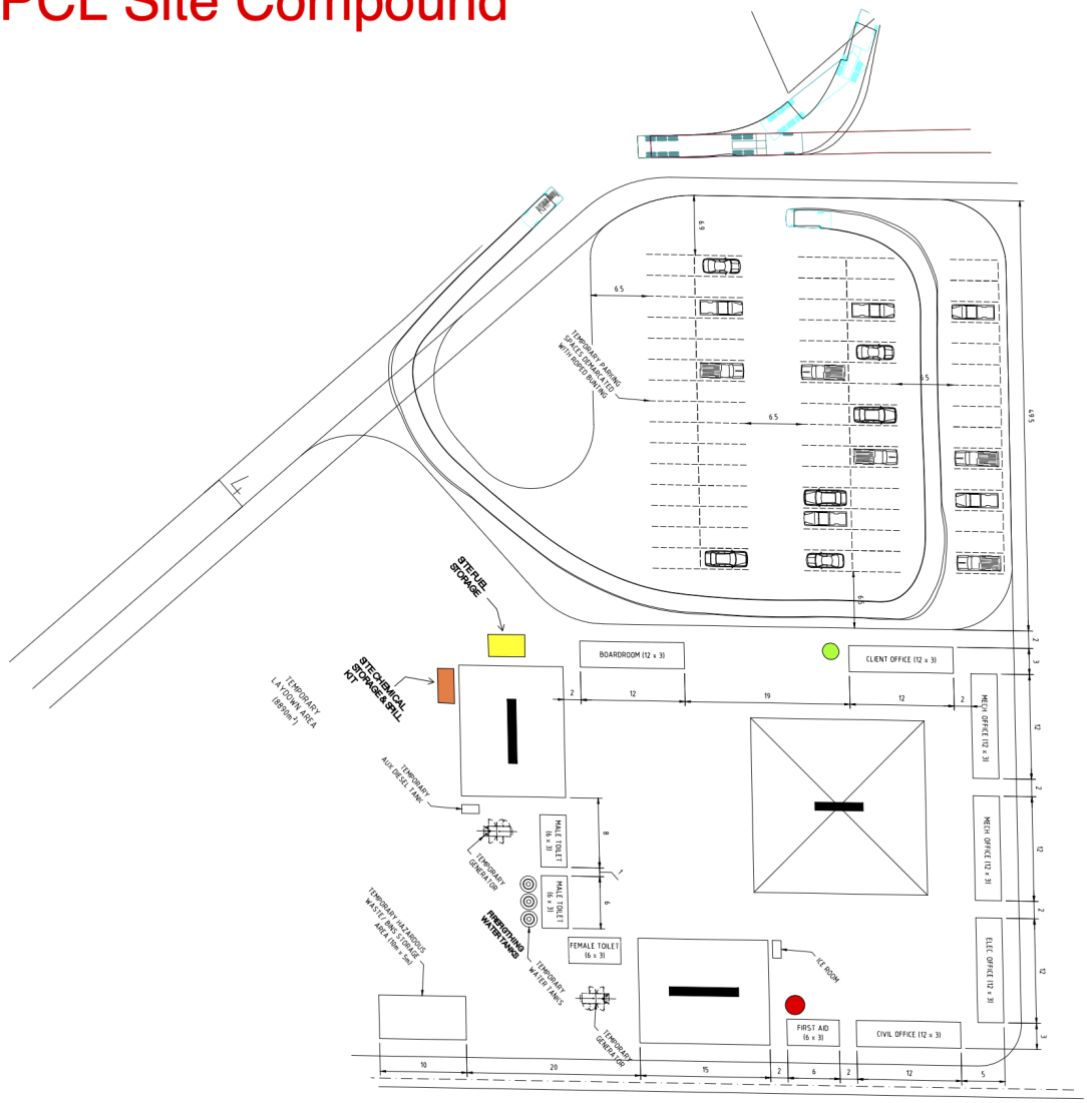
The plan is a document that needs to be updated when site infrastructure or processes change. Any changes introduced to the plan must be approved by the PCL Leadproject manager/site manager and Metis Energy, through a management of change process .

9 References

AS1940-2017: The storage and handling of flammable and combustible liquids (Standards Australia, 2017).

Attachment 1:
Spill kit location plan

PCL Site Compound



Attachment 2: Environmental Inspection Checklist

Spill Inspection Checklist

This form is be completed weekly

Please mark ✓for yes, **X** for no, **–** for inaccessible, **N.A** for not applicable

Week ending: _____ Date:_____

Inspection completed by: _____

Aspect	**Inspection**		**Observation**	**Remediated**	
	Yes	**No**		**Yes/No**	**Date**
Area					
Site office and admin building					
First aid & ablutions block					
Workshop					
Warehouse					
Waste storage area					
Unloading and loading area					
Generator bay 1					
Generator bay 2					
Car park					
Refuelling bay					
Chemicals/ dangerous goods storage cabinet 1					
Chemicals/ dangerous goods storage cabinet 2					
Other areas - specify					

Attachment 3:
Incident investigation form

Incident Investigation Form

This incident report is be completed for each incident identified

Spill or Event Incident Report				
Incident Summary				
Date of report:		Incident Date and approximate time:		
Type of incident (e.g spill, noise complaint)				
Name of reporter				
Location of incident				
Material/s discharged				
Amount/s discharged				
Cause of discharge				
Environment sector impacted (tick as appropriate)	Air:	Ground:	Water (onsite):	Water (offsite):
Did any material escape secondary containment and impact soil/water on site?				
Did any material escape off site? If yes, where to?				
Actions				
Who detected the discharge and what did they do?				
Who else on the staff was notified and what did they do?				
Spill kit items used (list items)				
Agency Response				
Were any agencies contacted?				
Who contacted the agency(ies), by what				

means, on what date, and at what approximate time?	
What was the agency response(s)	
Incident Review	
What was the root cause of the incident?	
What series of events led to the incident occurring?	
What was done well in response?	
What could have been done better?	
What wasn't done that should have been done?	
Incident Prevention	
Discuss any changes needed to prevent similar incidents in future	
Spill procedures	
Equipment	
Staff training	
Drains or structures	
Housekeeping practices	
Site management systems	
Standard operating procedures	
Other measures to prevent a similar event	
Future Response	
Have spill control and safety supplies been topped up?	
Have staff been de-briefed, and if necessary, re-trained?	

Other recommendations	
Further Actions	
Further actions, including timing, responsibility, budget, completion, review	

Name and position of person completing form: _____

Signed: _____

Date: _____

Aspect	Inspection		Observation	Remediated	
	Yes	No		Yes/No	Date
Stormwater management					
Triple interceptor trap 1					
Triple interceptor trap 2					
Drain 1					
Drain 2					
Sediment pond 1					
Sediment pond 2					
Drainage line 1					
Drainage line 2					
Spill kits					
Spill kit 1					
Spill kit 2					
Spill kit 3					
Spill kit 4					

Note 1: If inspection indicates any of the infrastructure is not operating as would reasonably be expected, management must be informed

Note 2: If inspection indicates spill kit is not complete, missing components must be replaced.