

management plan

Pollution Incident Response Management Plan – NorthConnex

A Transurban Group plan

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General Manager Operations NSW
General Manager Asset Management NSW

Document author

NSW Environmental Specialist

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PIRMP – NorthConnex Tunnel

1. Abbreviations, acronyms and definitions

Term or acronym	Description
NCX	NorthConnex Tunnel
DPHI	NSW Department of Planning, Housing, and Infrastructure – Formerly Department of Planning and Environment
DM Roads	Contractor who provides Incident Response and Maintenance Services under the Incident Response and Maintenance Deed
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
MCC	NorthConnex Motorway Control Centre
MCoA	Minister's Conditions of Approval
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
POEO Reg	Protection of the Environment Operations (General) Regulation 2009
TCRO	Traffic Control Room Operator
TfNSW	Transport for New South Wales
TMC	Transport Management Centre
Tollaust	Tollaust Pty Ltd – a subsidiary of Transurban Limited

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2. Introduction

2.1 Background

NorthConnex is constructed as a tolled motorway linking the M1 Pacific Motorway at Wahroonga to the Hills M2 Motorway at West Pennant Hills via twin motorway tunnels, each around nine kilometres in length.

Tollaustr Pty Ltd (Tollaustr) holds an Environment Protection Licence (EPL) number 21386 with the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act) for the Scheduled Activity of 'Road Tunnel Emissions' from the two ventilation outlets associated with the NorthConnex Tunnel. As per Part 5.7A of the POEO Act, Tollaustr has prepared this Pollution Incident Response Management Plan (PIRMP) that complies with the POEO Act and the *Protection of the Environment Operations (General) Regulation 2009* (POEO Reg.) 95A (1) and only applies to pollution events from "Road Tunnel Emissions".

If a pollution incident occurs due to "Road Tunnel Emissions" in the course of an activity so that material harm to the environment (within the meaning of Section 147 of the POEO Act) is caused or threatened, Tollaustr will immediately implement this plan in relation to the activity as required by Part 5.7A of the POEO Act. For all other pollution incidents that may result in material harm, see the NorthConnex Operation Environmental Plan section 5.3 *Management of pollution incidents and material harm*.

A written copy of this plan is kept at the NorthConnex Motorway Control Centre (MCC) (610 Pennant Hills Road, West Pennant Hills NSW 2125), made available on request by an authorised EPA Officer and is publicly available at (<https://www.northconnex.com.au>).

2.2 Objectives

The objectives of this PIRMP are to:

- Minimise and control the risk of a Road Tunnel Emissions pollution incident at the premises by requiring identification of risks and the development of planned actions to minimise those risks.
- Ensure comprehensive and timely communication about an incident to the EPA and other relevant government authorities and the community who may be affected by the impacts of an emission pollution incident.
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

2.3 Scope

This PIRMP for the NorthConnex motorway covers pollution incidents that cause actual or potential material harm to the environment and/or human health. This PIRMP applies to the 'scheduled activity' to which the EPL relates and identified in Section 1.4 below.

2.4 Ventilation outlet and system description

Both road tunnel emission outlets work by utilising the natural mixing of the atmosphere to disperse air pollutants and reduce their concentrations to background levels. The southern ventilation outlet is located at 610 Pennant Hills Road, West Pennant Hills NSW 2125, and the northern ventilation outlet located at 19

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Woonona Avenue, Wahroonga, NSW 2076 as pictured following. The broader location is shown in *Appendix B –Location Map*:

Figure 1: Southern Ventilation Outlet and Motorway Control Centre



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Figure 2: Northern Ventilation Outlet



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During operation, the ventilation systems draw fresh air into the tunnels via the tunnel portals which can be supplemented with fresh air drawn in at the tunnel support facilities at Wilson Road, Pennant Hills, and Trelawney Road, Thornleigh (see Appendix B). Air is emitted from within the tunnels via the two ventilation outlets shown in the figures 1 and 2 above.

Each ventilation facility consists of five axial fans. At full capacity, Northern and Southern compounds will operate with four fans, with the fifth fan on standby. Each ventilation facility is approximately 20 metres in height, as measured from the ground level of the adjoining land.

Each tunnel support facility consists of four vertically mounted bi-directional axial fans. Emergency smoke extraction and normal mode requirements can be achieved with three fans, with the fourth fan on standby. During low speed traffic / congested conditions, the tunnel support may be used to supply additional fresh air to the tunnels. During emergency conditions, depending on the location of the incident, the ventilation system can provide fresh air or would extract smoke from the tunnels which would be emitted from one or more of the following locations:

- Southern ventilation facility located within the MCC
- Wilson Road tunnel support facility
- Trelawney Street tunnel support facility
- Northern ventilation facility located primarily above the cut and cover section of the northbound main alignment near the connection with the M1 Pacific Motorway
- Tunnel exit and entry portals.

Jet fans are mounted in pairs throughout the tunnels, with each pair separated by a minimum linear distance of 90 metres. A total of 80 fans are installed in the northbound tunnel and ramps and around 60 fans in the southbound tunnel and ramps. The fans operate on an as-required basis to maintain in-tunnel air quality requirements.

3. What is a 'pollution incident'?

A 'pollution incident' is defined by the POEO Act as 'an incident or set of circumstances during or as a consequence of which there is likely to be a leak, spill or other escape of a substance, as a result of which pollution has occurred, 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'.

A pollution incident at NorthConnex that would be relevant to this PRIMP, may include an emission from the tunnel ventilation outlets that is above the limits of the EPL. Such incidents would also require notification to relevant authorities as outlined below.

3.1 Pollution incident notification

Pollution incidents causing or threatening material harm to the environment must be notified to EPA.

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An incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in Section 147 of the POEO Act as:

(a) harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

It is a requirement to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council (details in section 1.7).

‘Immediately’ has its ordinary dictionary meaning of promptly and without delay. This will ensure that pollution incidents are reported directly to the relevant response agencies and they will have direct access to the information they need to manage and deal with the incident in a faster time.

3.2 Incident Notification Information

Following a pollution incident, it must be reported immediately as outlined above. The Transurban Regulatory Notification guideline (TU-HSE-MN-02) should also be consulted prior to notification. The relevant information required for the notification is outlined in Section 150 of the POEO Act, and consists of the following:

- (1)
 - a) the time, date, nature, duration and location of the incident
 - b) the location of the place where pollution is occurring or is 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, if known)
 - e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
 - f) other information prescribed by the regulations.
- (2) The information required by this section is the information known to the person notifying the incident when the notification is required to be given.
- (3) If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with Section 148 of the POEO Act (see section 2.4, 2.6 and 2.7 of this PIRMP) immediately after it becomes known.

Additional information should also be recorded including:

- prevailing winds
- estimated height and magnitude of the emission
- location of any onsite fallout or offsite impacts
- likelihood of the pollutant reaching ground level
- possible impacts upon any sensitive receptors.

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The above information needs to be recorded and reported immediately to the regulatory authorities via email or phone. Contact details are outlined in section 2.3 below.

3.3 Regulatory Authorities

The current contact details of the relevant authorities under Section 148 of the POEO Act are outlined in the table below.

Authority	Email	Phone
EPA	info@epa.nsw.gov.au	131 555
NSW Health	MOH-EHB@health.nsw.gov.au	(02) 9424 5918
DPHI	information@planning.nsw.gov.au ;	1300 420 596
SafeWork NSW	contact@safework.nsw.gov.au	131 050
Fire and Rescue	contact@frnsw.nsw.gov.au	1800 679 737
Local Council	Parramatta City Council The Hills Shire Council Hornsby Shire Council Ku-ring-gai Shire Council	1300 617 058 02 9843 0555 02 9847 6666 02 9424 0000

3.4 Actions to be taken during or immediately after a Pollution Incident

When a Pollution Incident is indicated by alarms being triggered in the control room, the Traffic Control Room Officers (TCRO) immediately validates to the best of their ability that the data is correct, and the monitoring equipment appears to be operating correctly. The TCRO then notifies the Duty Manager who will escalate as outlined in the 'Incident Escalation and Notification' (NCX-OP-WI-002) work instruction to the appropriate staff including the NSW Environmental Specialist and Head of Environment. The TCRO would escalate to a 'Triple 000 call' if required and coordinate with TfNSW, Traffic Management Centre (TMC) and other motorway control centres as required.

Depending on the nature of the incident, the TCRO will implement the relevant procedure, or checklist from the following:

- Traffic Management and Safety Plan
- Evacuation Management Procedure
- Stationary Vehicle
- Vehicle Collision
- Fire
- On Road Hazards
- Incident Response Plan.

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The NSW Environmental Specialist would coordinate the notification of regulatory agencies such as DPE, EPA, NSW Health, Councils and SafeWork. The information outlined in section 2.2 needs to be recorded and reported immediately to the regulatory authorities via email or phone. Contact details are outlined in section 2.3.

3.5 Community Notifications

The process in determining whether or not the community is to be notified depends on the type, intensity and potential of impact to the community. Community stakeholder notification is required for incidents or events resulting from NorthConnex which:

- Will result in an unacceptable impact to community stakeholders during the incident (where community stakeholders are present, such as, residing in their houses or using adjacent recreational facilities at the time of the incident).
- Will result in an unacceptable impact to a community area that is to be used by community members in the days and weeks following the incident. These community stakeholders may not be present during the incident but might be present in the following days.

An unacceptable impact is defined as one which has the potential to adversely affect the health of a member of the community. This takes into consideration immediate health impacts (that occur during the incident) and health risks in the period following the incident.

The NorthWestern Roads Group NorthConnex Asset Manager in consultation with the NorthConnex Duty Manager, NorthConnex Maintenance Manager and other relevant staff where required, will make the above determination and trigger the stakeholder notification process. The NorthWestern Roads Group NorthConnex Safety, Environment and Stakeholder Manager and the NorthConnex Duty Manager will initiate and coordinate the notification process.

The process for notification of stakeholders relates directly to the nature of the hazard. In the event there is an unacceptable risk to the community from the pollution incident, the identified community will be notified. In this event the following actions, where appropriate and safe to do so, may include:

- Providing information to the TMC for distribution
- Use of technology such as Variable Message/Motorway signage
- Local Media – Radio / TV if required
- Update to the NorthConnex website
- Further face to face/telephone contact
- Letterbox drops
- Email.

Tollaustr will use a combination of the above mechanisms to ensure that relevant community messages are quickly and effectively distributed amongst the affected community.

It is likely that during the notification process, the incident will likely be under the control of emergency services personnel. In such an event the capabilities of emergency agencies would also be utilised where appropriate. NorthConnex Duty Manager and NSW Environmental Specialist will provide all the necessary assistance to the incident controller including escalating to the NorthConnex Community Engagement Advisor.

For air pollution incidents that may affect community members, those community members may be asked to either close their doors and windows and stay indoors until further notice or the vacate the premises. To

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assist in the areas that would be affected by a pollution incident sensitive receivers such as schools, local government and National Parks have been identified in Appendix C.

Tollaustr will provide regular updates of any pollution incidents either via letterbox drop, notices in local papers and/or via door knocks, use of variable message signs, and local radio as required in consultation with relevant authorities.

4. Roles and Responsibilities

As required by the POEO Act; the roles and responsibilities are described below of those key individuals who are responsible for activating this PIRMP, managing the response and notifying relevant authorities:

Role	Responsibility	Contact Details (24hr)
NorthConnex Tunnel Motorway Control Centre (MCC) – Traffic Control Room Officers	<ul style="list-style-type: none">Responsible for managing the initial response to a pollution incident including traffic management.Responsible for activating the PIRMP.Responsible for advising Asset Operations Lead-NorthConnex or the Duty Manager outside business hour.	13 33 31
Asset Operations Lead – NorthConnex (Duty Manager)	<ul style="list-style-type: none">Responsible for managing the traffic response to the incident.Notify relevant stakeholders to notify relevant managers in Transurban and the Environmental Specialist NSW.	
NSW Environmental Specialist	<ul style="list-style-type: none">Support the managing of the response to the incident.Notify relevant authorities under Section 148 of the POEO Act.	

5. Inventory of Pollutants

Due to the nature of the generation of pollutants relevant to the EPL, the ventilation system expels gaseous exhaust emissions immediately and does not store pollutants on the premises. As per the requirements set out in the POEO Act; there is no pollutant register detailing pollutant type, maximum quantity and location of potential pollutants appended to this PIRMP. Pollutants relevant to the EPL are described in section 4.1 below.

5.1 Hazards to the Environment and Human Health

The EPL requires the following potential hazards to the environment and human health be continuously monitored:

→ Carbon monoxide (CO)

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CO is a colourless, odourless gas produced by the incomplete combustion of fuels containing carbon (for example, oil, gas, coal and wood). CO is absorbed through the lungs, where it reacts to reduce the blood's oxygen-carrying capacity.

Adverse health effects of exposure to carbon monoxide are linked with carboxyhaemoglobin (COHb) in blood. In addition, association between exposure to carbon monoxide and cardiovascular hospital admissions and mortality, especially in the elderly for cardiac failure, myocardial infarction and ischemic heart disease; and some birth outcomes (such as low birth weights) have been identified (NEPC 2010)

→ Nitrogen Dioxide (NO₂) and Nitrogen oxides (NO_x)

Nitrogen dioxide (NO₂) is a brownish gas with a pungent odour. It exists in the atmosphere in equilibrium with nitric oxide. The mixture of these two gases is commonly referred to as oxides of nitrogen (NO_x). NO_x refers to a collection of highly reactive gases containing nitrogen and oxygen, most of which are colourless and odourless. Nitrogen oxide gases form when fuel is burnt.

As NO_x is a product of combustion processes, motor vehicles and industrial combustion processes are the major sources of ambient NO_x in urban areas. NO₂ can cause inflammation of the respiratory system and increase susceptibility to respiratory infection. Exposure to elevated levels of nitrogen dioxide has also been associated with increased mortality, particularly related to respiratory disease, and with increased hospital admissions for asthma and heart disease patients. Asthmatics, the elderly and people with existing cardiovascular and respiratory disease are particularly susceptible to the effects of nitrogen dioxide.

→ Volatile Organic Compounds (VOTC)

VOC were implicated as a major precursor in the production of photochemical smog, which causes atmospheric haze, eye irritation and respiratory problems. VOC are emitted from vehicle exhausts. Three primary VOC (benzene, toluene and xylenes) are components of petroleum and diesel fuel and are typically the focus for assessments of engine combustion emissions.

Benzene is an airborne substance that is a precursor to photochemical smog. Benzene exposure commonly occurs through inhalation of air containing the substance. It can also enter the body through the skin, although it is poorly absorbed this way. Low levels of benzene exposure result from car exhaust. Benzene is considered to be a toxic health hazard and a carcinogen. It has high acute toxic effects on aquatic life and long-term effects on marine life and agricultural crops. Human exposure to very high levels for even brief periods of time can potentially result in death, while lower level exposure can cause skin and eye irritation, drowsiness, dizziness, headaches and vomiting, damage to the immune system, leukemia and birth defects.

Toluene (methylbenzene) is a highly volatile chemical that quickly evaporates to a gas if released as a liquid. Due to relatively fast degradation, toluene emissions are usually confined to the local area in which it is emitted. Human exposure typically occurs through breathing contaminated air, but toluene can also be ingested or absorbed through the skin (in liquid form). Toluene usually leaves the body within twelve hours.

Short-term exposure to high levels of toluene can cause dizziness, sleepiness, unconsciousness and sometimes death. Long-term exposure can cause kidney damage and permanent brain damage that can lead to speech, vision and hearing problems, as well as loss of muscle and memory functions. The substance can cause membrane damage in plant leaves and is moderately toxic to aquatic life with long-term exposure.

Xylenes are flammable liquids that are moderately soluble in water. They are quickly degraded by sunlight when released to air, and rapidly evaporate when released to soil or water. They are used as solvents and in petrol and chemical manufacturing. Xylenes can enter the body through inhalation or skin absorption (liquid form), and can cause irritation of the eyes and nose, stomach problems, memory and concentration problems, nausea and dizziness. High-level exposure can cause death. The substances have high acute and chronic toxicity to aquatic life and can adversely affect crops.

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→ Solid Particles

Airborne particles are commonly differentiated according to size based on their equivalent aerodynamic diameter. Particles with a diameter of less than or equal to 50 micrometres (mm) are collectively referred to as total suspended particulates (TSP). TSP primarily cause aesthetic impacts associated with coarse particles settling on surfaces, which also causes soiling and discolouration. These large particles can, however, cause some irritation of mucosal membranes; they pose a greater risk to health when ingested if they are contaminated. Particles with diameters less than or equal to 10 mm (known as PM₁₀) are primarily created through crushing and grinding of rocks and soil, and typically comprise soot, dirt, mould and pollen. These particles tend to remain suspended in the air for longer periods than larger particles (minutes or hours) and can penetrate into human lungs. Fine particulates (those with diameters less than or equal to 2.5 mm, known as PM_{2.5}) are typically generated from vehicle exhaust, bushfires and some industrial activities, and can remain suspended in the air for days or weeks.

As these fine particulates can travel further into human lungs than the larger particulates and are often made up of heavy metals and carcinogens, fine particulates are considered to pose a greater risk to health. Exposure to particulate matter has been linked to a variety of adverse health effects, such as respiratory problems (for example coughing, aggravated asthma, chronic bronchitis), lung damage and non-fatal heart attacks. Furthermore, if the particles contain toxic materials (such as lead, cadmium, zinc) or live organisms (such as bacteria or fungi), toxic effects or infection can occur from inhalation of the dust.

→ Polycyclic Aromatic Hydrocarbons (PAH)

PAH are a group of over 100 chemicals, which are formed through the incomplete combustion of organic materials, such as petrol. Exposure to these chemicals can cause a range of adverse reactions, including irritation of the eyes, nose and throat and skin. Exposure to very high levels can result in symptoms such as headaches, nausea, damage to the liver and kidneys, and damage to red blood cells. A number of PAH were declared to be probably or possibly carcinogenic to humans by the IARC. PAH can attach to dust particles and be transported through the air. The compounds break down over days or weeks through chemical reactions in the atmosphere. PAH are moderately or highly acutely toxic to birds and aquatic organisms and moderately/highly chronic toxicity to aquatic life. Some can cause damage and death to crops. PAH can bioaccumulate and are moderately persistent in the environment.

Overall, poor air quality can have impacts on the environment and human health.

5.2 Likelihood of Hazards to the Environment and Human Health occurring

Air quality assessments were conducted as part of the NorthConnex Environmental Impact Statement. These assessments included the modelling of operational scenarios, such as normal operation and vehicle breakdown scenarios, and concluded that *“The results of the dispersion modelling determined that concentrations of nitrogen dioxide, carbon monoxide, volatile organic compounds and PAHs would all be well below the applicable impact assessment criteria. While exceedances of the criteria for PM₁₀ and PM_{2.5} were predicted to occur, these were attributable to elevated background concentrations of these pollutants, with the project contributing only minor levels of particulates to the airshed. The estimated annual TSP concentrations, using the annual PM₁₀ concentrations as a surrogate, were also determined to be well below the assessment criteria. As such, the project is considered unlikely to adversely affect local or regional air quality”*.

Therefore, as the concentrations of the parameters considered to be hazards were considered to be well below the assessment criteria, the likelihood of any such hazards creating a pollution incident during normal operations of the tunnel are considered very low. As part of the EPL, these parameters are continuously monitored at each ventilation outlet.

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During an emergency situation, such as a fire in the tunnel, concentrations of the parameters may be elevated to a point where a pollution incident may occur. Experience across other tunnels in Sydney shows that such scenarios are rare, in part due to the controls outlined in section 5.2 below, and as such the likelihood is considered low.

5.3 Controlling Hazards to the Environment and Human Health

The abovementioned hazards are mitigated by Tollaust through the implementation of the following controls:

- As detailed section 1.4 and in the *Operational Environmental Management Plan for NorthConnex* (NCX-EV-PL-001) and *MSP-3 Air Quality Management Sub-Plan for NorthConnex* the tunnel's air quality is managed by the use of a fan circulation ventilation system that link to air quality monitoring equipment in the ventilation outlets and within the tunnel, traffic numbers and traffic speed.

The computer system that monitors the tunnel includes the Air Quality monitoring data parameters. Alarms are sounded at several points if air quality parameter concentrations are increasing prior to the exceedance limit to allow mitigation actions to be implemented. The system will adjust itself based on certain parameters to manage the air quality, however the TCRO's are able to manually adjust variables such as the axial and jet fan speed, traffic speed, clean air inflow and ventilation system to improve the air quality in the tunnel and subsequently the ventilation outlets if required.
- Ventilation and traffic procedures are implemented by the TCRO's who operate the motorway 24 hours a day, 365 days per year. TCRO's are trained in and implement the operational procedures to control factors that influence pollutant concentrations to keep them below the concentration limits. This may include increasing clean air intake fan and outlet fan speeds, changing jet fan speeds, reducing traffic speeds, excluding traffic from the tunnel(s), or a combination of these actions. The TCRO's ensure that the ventilation system is operating efficiently to ensure pollutants are expelled from the tunnel through the ventilation outlets within the limits required by the EPL.
- TCRO Emergency and incident management procedures.
- Continuous, quarterly and annual air monitoring at the ventilation outlets, within the tunnel and at ambient monitoring stations, undertaken in accordance with the MCoA's and EPL. This monitoring is audited 6-monthly by an independent air quality expert.
- In tunnel infrastructure including emergency evacuation passages, cross passages, Public Address system and firefighting systems.
- Exclusion of Dangerous Goods vehicles from entering the tunnel to reduce the risk of fire and explosions.
- Quarterly and annual risk assessment reviews to ensure mitigations are working correctly.
- Personnel Protective Equipment (PPE) available to staff including high visibility clothing, masks, eye protection, ear protection, helmets, gloves and steel capped boots.

Controls are also described in the *NorthConnex Operational Environmental Management Plan* (NCX-EV-PL-001) and the associated *MSP-3 Air Quality Management Sub-Plan*. These documents are publicly available on the NorthConnex website.

6. Testing, Review and Amendment

This PIRMP will be tested in accordance with the requirements set out in the POEO Reg. as follows:

- To ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.
- Any such test is to be carried out:

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- At least once every twelve months
- Within one month of any pollution incident occurring, resulting in 'environmental harm.'

Testing would be completed on a minimum annual basis and may include desktop scenarios.

The NorthConnex Tunnel as a whole has a number of potential scenarios that may impact the environment; detailed in the publicly available *Operational Environmental Management Plan for NorthConnex*.

In this PIRMP the following details will be recorded on a continuous basis:

- *Review*: Date, version, author and nature of change (Page 2).
- *Test*: Date (tested), description of test, conducted by, and date updated in the register stored in the internal Transurban DMS.

7. Staff Training

All TCROs receive training to ensure that they can effectively implement this PIRMP. Ongoing training ensures that they are able to prevent and respond to exceedances should they occur. Training includes but is not limited to:

- Employee responsibilities and legal obligations in relation to stack exceedances and reporting requirements.
- Identification of site issues that may lead to a stack exceedance.
- Identify appropriate immediate action to control and contain an incident including provision of contact details of relevant personnel for notification.

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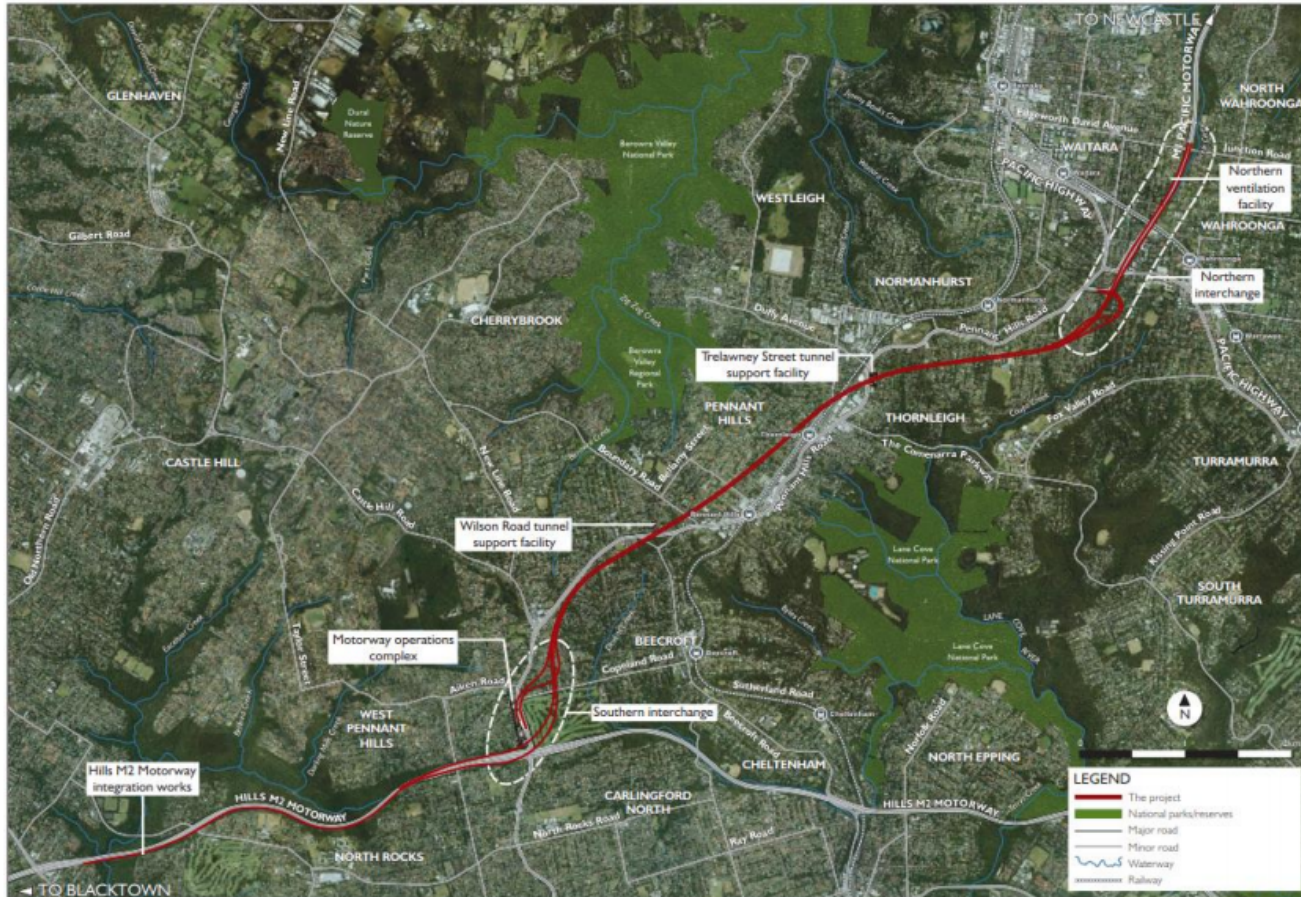
8. Appendix A: Compliance Register

Below describes how the above PIRMP complies with the requirements under Section 3 General requirements for preparing pollution incident response management plans the EPA Guideline (2012):
Preparation of pollution incident response plans:

Requirement	Section of PIRMP
3.3.1 Description and likelihood of hazards [clause 98C (1)(a) and (b)]	4.1 Hazards to the Environment and Human Health
3.3.2 Pre-emptive actions to be taken [clause 98C(1)(c)]	4.3 Controlling Hazards to the Environment and Human Health
3.3.3 Inventory of pollutants [clause 98C(1)(d) and (e)]	4.0 Inventory of Pollutants
3.3.4 Safety equipment [clause 98C(1)(f)]	4.3 Controlling Hazards to the Environment and Human Health
3.3.5 Contact details [clause 98C(1)(g) and (h)]	3.0 Roles and Responsibilities 2.3 Regulatory Authorities
3.3.6 Communicating with neighbours and the local community [clause 98C(1)(i)]	2.5 Community Notifications
3.3.7 Minimising harm to persons on the premises [clause 98C(1)(j)]	4.3 Controlling Hazards to the Environment and Human Health
3.3.8 Maps [clause 98C(1)(k)]	1.4 Ventilation and outlet description Appendix B: Broader Location Map
3.3.9 Actions to be taken during or immediately after a pollution incident [clause 98C(1)(l)]	2.4 Actions to be taken during or immediately after a Pollution Incident
3.3.10 Staff training [clause 98C(1)(m)]	6 Staff Training

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9. Appendix B: Broader Location Map



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10. Appendix C: Nearby Sensitive Receivers

Sensitive Receivers near tunnel facilities (Within 2km)			
Facility	Local Government Area	Sensitive receiver	Approx. distance and direction from facility
Northern Ventilation	Ku-Ring-Gai Shire 9424 0000	St Edmund's College 9487 1044	1km E
		Wahroonga Preparatory School 9489 3921	0.4km SE
		Wahroonga Public School 94893086	1.3km E
		Prouille Catholic Primary School 9489 3233	0.8km SE
		St Lucy's School 9487 1277	0.8km SE
		Knox Grammar Preparatory School 9473 9353	0.9km SE
		Abbotsleigh School 9473 7777	0.9km S
		Abbotsleigh Junior School 9473 7700	0.5km S
		Knox Senior School 9473 9353	1.3KM S
		Wahroonga Nursing Home 02 9847 2400	1.4km W
	Hornsby Shire	Hammond Care Wahroonga 1800 776 112	1.5km S
		Tallwoods Corner 02 9847 380	0.8km W
		Thomas and Rosetta Agst Aged Care Facility 02 9450 8320	1.4km S
		Wahroonga Place Care Community 02 9372 3800	1.2km SW
		Catholic Healthcare McQuoin Park Retirement Village	1.5km SW
		Asquith Boys High School 9477 3508	2.4km NW
		Waitara Public School 9489 3105	0.5km NW
		Barker College 8999 6354	1.5km W
		Hornsby Girls' High School 9476 5711	1.4km NW
		Hornsby Ku-ring-gai Hospital 9477 9123	1km NNW
		Normanhurst Boys High School	1.9km SW

PIRMP – NorthConnex Tunnel

Sensitive Receivers near tunnel facilities (Within 2km)			
Facility	Local Government Area	Sensitive receiver	Approx. distance and direction from facility
Southern Ventilation		9489 1077	
		Next Generation Childcare 9487 1788	1.5km NW
		Wahroonga Long Day Care Centre 9489 7868	1.8km SW
	The Hills Shire	West Pennant Hills Primary 9484 7400	1.5km N
		Young Academics Early Learning Centre 1300 668 993	1km N
		Heritage House Beecroft Childcare and Early Learning Centre 9484 1408	1.5km E
		Guardian Childcare and Education West Pennant Hills 138 230	2.0km W
	Parramatta City	Royal Institute for Deaf and Blind Children 9871 1233	2.1km SW
		North Rocks Primary School 9871 1772	2.3km SW
		Muirfield High School 9872 2244	2.4km W
		Murray Farm Public School 9871 5952	1.2km SW
		Karonga School 9868 1922	1.8km SE
		Epping Heights Primary School 9876 2791	2.4km ESE
		St Gerard's Catholic Primary School 9871 1633	0.8km S
		Roselea Public School 9871 1324	0.9km S
	Hornsby Shire	Beecroft Primary School 9484 8844	1.7km ENE
		Cheltenham Girls' High School 9876 4481	2.3km E
		Arden Anglican School 9484 1146	2km NE
		Mount St Benedict College 9980 0444	2.3km NNE
		Presbyterian Aged Care 1800 722 679	2.0km E