Pollution Incident Response Management Plan (PIRMP) – Hume Power Station

EPA Licence NO. 10675

Infra Asset Management (IAM)

HSE-HUM-FG-021 | Version 6

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Foresight

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Authorisation

Authorisation	Name	Position Title
Reviewed by	Shoaib Karamat	HSE Advisor
Approved by	Mia Kongpeng	HSE Manager

Document Revision History

Version made to this document:

#	Date	Revision Description	Reviewer / Stakeholders
1	31 October 2014	Updated various sections to reflect change in licence holder	Nicola Foran
2	17 July 2015	Updates various sections to include additional detail resulting from EPA Audit.	Nicola Foran
3	21 October 2016	Minor amendments to reflect changes in terminology.	Nicola Foran
4	10 August 2018	Updated various sections to reflect change in parent company and general administrative and formatting changes.	Shaun Coffey
4.1	14 November 2018	Added sections 3 and 4 and made minor administrative changes.	Shaun Coffey
4.2	25 June 2019	Review following oil spill event	Shaun Coffey
5	16 December 2022	Updated to Foresight Group / Peak Renewables. Section 4 and 5 updated.	Chris Baldwin
6	March 2026	PIRMP comprehensively reviewed following the 22 Oct 2025 oil leak incident. Updates include formalisation of the Pollution Incident Response Management Plan, addition of the pollution incident notification flowchart, and clarification of incident response and external authority notification requirements.	Shoaib Karamat, Jason Ruby

1 Introduction

1.1 Purpose

The Protection of the Environment Legislation Amendment Act 2011 requires holders of an Environment Protection Licence to prepare, keep, test, and implement a Pollution Incident Response Management Plan (PIRMP).

This PIRMP sets out the arrangements for managing, responding to, and notifying pollution incidents at Hume Power Station in accordance with the Protection of the Environment Operations Act 1997 (POEO Act), the Protection of the Environment Operations (General) Regulation 2022, and Environment Protection Licence No. 10675.

By preparing and implementing a PIRMP, GSP Energy aims to ensure there is:

- Pollution incidents are identified, responded to, and communicated promptly and effectively
- Regulatory notification obligations are met without delay
- Risks to human health and the environment are minimised
- Roles and responsibilities during a pollution incident are clearly defined
- The PIRMP is tested, reviewed, and maintained to remain current and effective

1.2 PIRMP Activation

This PIRMP must be immediately implemented where a pollution incident occurs, or is suspected to occur, that causes or threatens to cause material harm to the environment, as defined under section 147 of the POEO Act.

Where there is uncertainty as to whether an incident meets the threshold of material harm, this PIRMP must be activated as a precautionary measure while further assessment is undertaken.

1.2.1 Pollution Incident Examples

Examples of pollution incidents that may trigger activation of this PIRMP include, but are not limited to:

- An unplanned spill or leak of oil, fuel, hydraulic fluid, or chemicals to land or a waterway
- Discharge of contaminated water from plant, bunds, sumps, or drainage systems to the environment
- Failure of containment systems resulting in potential off-site environmental impact
- Any release of pollutants that threatens waterways, soil, air quality, or surrounding land

These examples are provided for guidance only and do not limit the obligation to activate the PIRMP where actual or potential material harm to the environment exists.

1.3 Legislative Requirements

The requirements for a Pollution Incident Response Management Plan are set out in Part 5.7A of the POEO Act and Chapter 4 of the POEO Regulation.

In summary, the legislation requires that:

- A PIRMP is prepared for the licensed activity
- The PIRMP includes all prescribed information
- The PIRMP is kept at the premises
- The PIRMP is tested at least every 12 months and after any pollution incident

Compliance with these requirements is demonstrated in Appendix E, PIRMP Legislative Compliance Register.

1.4 Scope

This PIRMP:

- Applies to all employees, contractors, and visitors at Hume Power Station

- Covers pollution incidents arising from site operations and associated plant
- Sets out notification, coordination, and response arrangements specific to pollution incidents
- Operates in conjunction with the Site Emergency Response Plan (ERP)

2 Associated Documentation

Parent Documentation – *(Any change to the parent document would require a review of this document)*	**Child Documents – (*Any change to this document would trigger a review of the child document(s)*)**
Environment Protection Licence (EPL) Licence # 10675	HSE-HUM-PR-007 Emergency Response Plan (ERP) - Hume Power Station – Section 8, 17.12 and 18.5
HSE-FG-007 Emergency Response Plan (ERP) - Hume Power Station_v8	

3 Definitions & Abbreviations

Terms	Definition
Chief Warden	The Site Supervisor or delegated person responsible for overall control and coordination of the site response during an emergency or pollution incident.
Community Notification	The process of informing neighbouring landholders, stakeholders, or the broader community of a pollution incident where there is potential off-site impact, coordinated in consultation with relevant authorities.
Environment Protection Licence (EPL)	A licence issued under the Protection of the Environment Operations Act 1997 authorising scheduled activities and setting conditions for environmental management.
Emergency Response Plan (ERP)	The site document that defines detailed emergency response procedures, command structure, evacuation, containment, and operational response actions.
EPA	NSW Environment Protection Authority, the primary environmental regulator in New South Wales.
HSE	Health, Safety and Environment
IAM	Infra Asset Management.
Material Harm	Harm to the environment that is not trivial and includes actual or potential harm to human health or ecosystems, or property damage exceeding $10,000, as defined under section 147 of the POEO Act.
POEO Act	Protection of the Environment Operations Act 1997 (NSW).
POEO Regulation	Protection of the Environment Operations (General) Regulation 2022 (NSW).
Pollution	Water pollution, land pollution, air pollution, or noise pollution as defined under the POEO Act.
Pollution Incident	A pollution 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:

Terms	Definition
	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.
PIRMP	Pollution Incident Response Management Plan prepared in accordance with the POEO Act and POEO Regulation.
Premises	The licensed site to which the Environment Protection Licence applies, being Hume Power Station.
Site Supervisor	The person responsible for day-to-day operational oversight of the site and who assumes the role of Chief Warden during an incident unless delegated otherwise.
WaterNSW	The NSW state-owned corporation responsible for managing water infrastructure and operations associated with Hume Dam and surrounding assets.

4 Responsibilities

The following table summarises the key roles and responsibilities under this Pollution Incident Response Management Plan (PIRMP).

Role	Responsibilities
Senior Management	• Ensure the PIRMP is established, implemented, and maintained in accordance with legislative and Environment Protection Licence requirements • Ensure adequate resources are provided to support effective pollution incident response • Ensure systems are in place for notification to the EPA and other relevant authorities • Endorse outcomes of PIRMP testing and reviews and approve significant updates
Team Lead / Site Managers / Supervisors	• Implement the PIRMP at site level and ensure it is accessible and understood • Lead and coordinate the site response during a pollution incident • Ensure pollution incidents are reported, and notifications are initiated in accordance with the PIRMP • Support and participate in annual PIRMP testing and post-exercise reviews
HSE Team	• Maintain, review, and update the PIRMP to ensure ongoing compliance with legislative and licence requirements • Coordinate and facilitate annual PIRMP testing, including desktop simulations and practical exercises • Ensure the PIRMP is reviewed following testing, incidents, or material changes • Provide technical support during pollution incidents and regulatory notification processes • Track and close corrective actions arising from PIRMP testing and incidents

Role	Responsibilities
Employees / Contractors	• Immediately report any actual or potential pollution incident to site management • Comply with the requirements of the PIRMP and follow site response instructions • Participate in PIRMP training, testing, and exercises as required • Take reasonable steps to prevent or minimise environmental harm

5 Site & Environment Protection Licence (EPL) Details

5.1 Definition of Premises

Environment Protection Licence 10675 is held by GSP Energy Pty Ltd for the operation of the Hume Power Station**,** located at Unnamed Road, Hume Weir NSW 3691.

The licence authorises electricity generation, otherwise than from coal, diesel or gas, with an annual generating capacity between 250 and 450 GWh. The licence anniversary date is 31 October.

5.2 Maps and Drainage Information

Site layout plans, drainage pathways, and environmental controls are provided in Appendix A and ERP appendices to support pollution incident response and containment.

5.3 Site Contacts

Role	Name	Contact Number
Site Manager	Jason Ruby	-
Duty Hydro Maintenance Officer (HMO)	On-call Duty HMO	0436 631 818

5.4 Licence Issuer

The licence is administered by the NSW Environment Protection Authority**,** which is responsible for regulatory oversight and compliance.

NSW EPA contact details are as follows.
6 Parramatta Square, 10 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
Phone 131 555
Email info@epa.nsw.gov.au

6 PIRMP and Emergency Response Plan Interface

This PIRMP operates in conjunction with the Hume Power Station Emergency Response Plan (ERP).

While this PIRMP establishes the legislative framework for pollution incident management and regulatory notification requirements, the detailed operational response plan procedures for pollution incidents are contained within the Hume Power Station Emergency Response Plan (ERP)**.**

The ERP (Section 17.12) Code Green – Pollution Incident Response procedure outlines the step-by-step operational response actions, including the incident command structure, containment actions, and notification requirements to external authorities.

In the event of a pollution incident, the operational response must be managed in accordance with the ERP, while this PIRMP ensures compliance with the Protection of the Environment Operations Act 1997, including notification obligations and PIRMP testing requirements.

6.1 Pollution Risk Overview

A high-level assessment of pollution risks associated with the operation of Hume Power Station has been undertaken.

Primary pollution risks include unplanned releases of oils, fuels, or chemicals from plant, equipment, or storage systems, with potential impacts to land or surface waters, including the Murray River.

Preventative and mitigation controls are managed through operational procedures, maintenance programs, and engineering controls. This PIRMP focuses on response and notification arrangements should those controls fail.

7 Pollution Incident Response

7.1 Incident Detection and Early Warning

Pollution incidents may be identified through:

- Abnormal plant operating conditions or alarms
- Visual observation by employees or contractors
- Inspections and maintenance activities
- Reports from WaterNSW, external stakeholders and members of public

Any person who identifies an actual or potential pollution incident must immediately notify the Site Supervisor or Chief Warden.

7.2 Possible Sources of Pollution

Potential sources of pollution at the site include:

- Transformer oils
- Hydraulic and lubricating oils
- Diesel fuel
- Miscellaneous oils and chemicals

The table below identifies potential sources of pollution at the site, including the location, substance type, and maximum quantities stored or in use. This information supports the identification of pollution risks and informs response planning under this PIRMP.

Store	Location	Substance(s)	Quantity (liters)
2 x 11kV/66kV/132kV Transformers	Switchyard	Transformer Oil (FR3 Vegetable Based)	43,500 each
2 x 11kV/415V Auxiliary Transformers	Switchyard	Transformer Oil	1,200 each
2 x Unit Governor Systems	Power Station	Shell Turbo 68 Petroleum-based Oil	7,000 each
2 x Unit Generator Bearing Systems	Power Station	Shell Turbo 68 Petroleum-based Oil	6,680 each
2 x Turbine Bearing Systems	Power Station	Shell Turbo 68 Petroleum-based Oil	1,000 each
2 x Main Intake Gates	Dam Wall	Mobil EAL 224 H vegetable based hydraulic oil	750 each
Standby Generator	Power Station	Diesel	600

Mobile Diesel Pump	Mobile	Diesel	450
Miscellaneous (Oils, Lubricants, Flammables, other chemicals)	Power Station	Various	<200

7.3 Pollution Incident Response

In the event of a pollution incident, response actions must be undertaken in accordance with the Pollution Incident Response Flow Chart provided in Appendix B, *Section 17.12 'Code Green – Pollution Incident Response Management Plan'* of the Emergency Response Plan.

Response activities focus on:

- Making the area safe
- Isolating the source where practicable
- Containing and minimising environmental harm
- Coordinating with emergency services and regulators

8 Pollution Incident Notification

8.1 Duty to Notify

Under the POEO Act, the following persons have a duty to notify a pollution incident that causes or threatens material harm:

- An employee carrying out the activity
- The employer
- The occupier of the premises

Notification must be made immediately after becoming aware of the incident.

8.2 what information must you supply to authorities?

Sufficient detail of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known)
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Any information that is not known when the incident is notified must be provided immediately once it becomes known

8.3 External Authority Notification

Following a pollution incident, the Site Supervisor or Chief Warden is responsible for ensuring that all required external authority notifications are made in accordance with the Protection of the Environment Operations Act 1997.

Where there is an immediate threat to human health or property, emergency services must be contacted via 000 as the priority, and the site Emergency Response Plan activated.

Appendix B – External Authority Notification Flowchart defines the notification decision logic and priority, including notification of the Environment Protection Authority and other relevant agencies based on the nature and impact of the incident.

Notes:

i. Notification of the Environment Protection Authority is required for all pollution incidents involving actual or potential material harm to the environment.
ii. Additional authorities must be notified where required based on public health, workplace health and safety, or local impact considerations.
iii. All notifications must be recorded, including the time of notification, authority contacted, and person spoken to.

8.3.1 When Should You Notify Authorities?

Environment Protection Licence holders and any person conducting an activity or occupying premises must immediately notify a pollution incident under section 148 of the POEO Act.

Immediately means promptly and without delay.

This duty does not apply to incidents involving only odour emissions or noise emissions.

8.4 Community and Stakeholder Notification

Where a pollution incident has the potential to impact neighbouring landholders, waterways, or the broader community, notification will be coordinated by site management in consultation with the EPA and relevant authorities.

Community notification may include direct contact with WaterNSW, emergency services-led communication, or EPA-directed notification processes.

9 Testing Requirements for the PIRMP

This PIRMP is tested at least annually during the licence reporting period and post-pollution incident.

Testing may include desktop simulations or practical exercises, including integration with ERP drills.

Outcomes, findings, and corrective actions are documented and tracked by the HSE Team.

Further details on the annual testing of the PIRMP are provided in Appendix D – PIRMP Annual Testing History.

10 Training

PIRMP awareness and environmental incident reporting requirements are included in site inductions and environmental training programs.

Personnel with specific roles in pollution incident response receive additional training as required.

11 PIRMP Availability

This PIRMP is:

- Kept at the Hume Power Station
- Available to employees and contractors
- Publicly available online in accordance with regulatory requirements
- Made available to authorised officers upon request

12 Document Control

This PIRMP is reviewed at least annually and following:

- A pollution incident
- Changes to operations or licence conditions
- Outcomes of PIRMP testing

13 Reference Documents

Source	Document
IAM Procedures	Environment Protection Licence (EPL)Licence # 10675 HSE-FG-007 Emergency Response Plan (ERP) - Hume Power Station v8
External Documents	EPA Guidelines Environmental Guidelines: Preparation of Pollution Incident Response Management Plans, NSW Environment Protection Authority, 2012
Regulations	Protection of the Environment Operations Act 1997 (NSW)
	Protection of the Environment Operations (General) Regulation 2022
	Protection of the Environment Legislation Amendment Act 2011 (NSW)

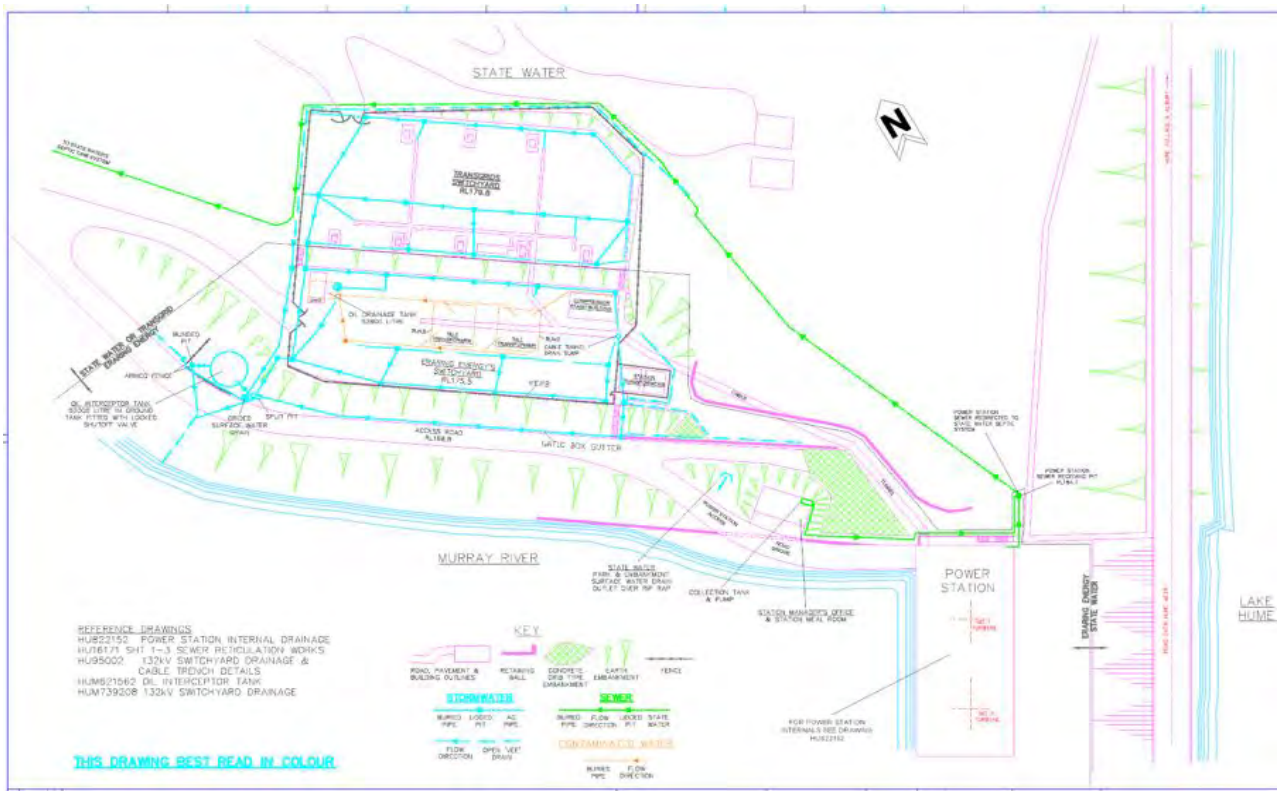
14 Appendices

14.1 Appendix A – Site Layout and Pollution Source Information

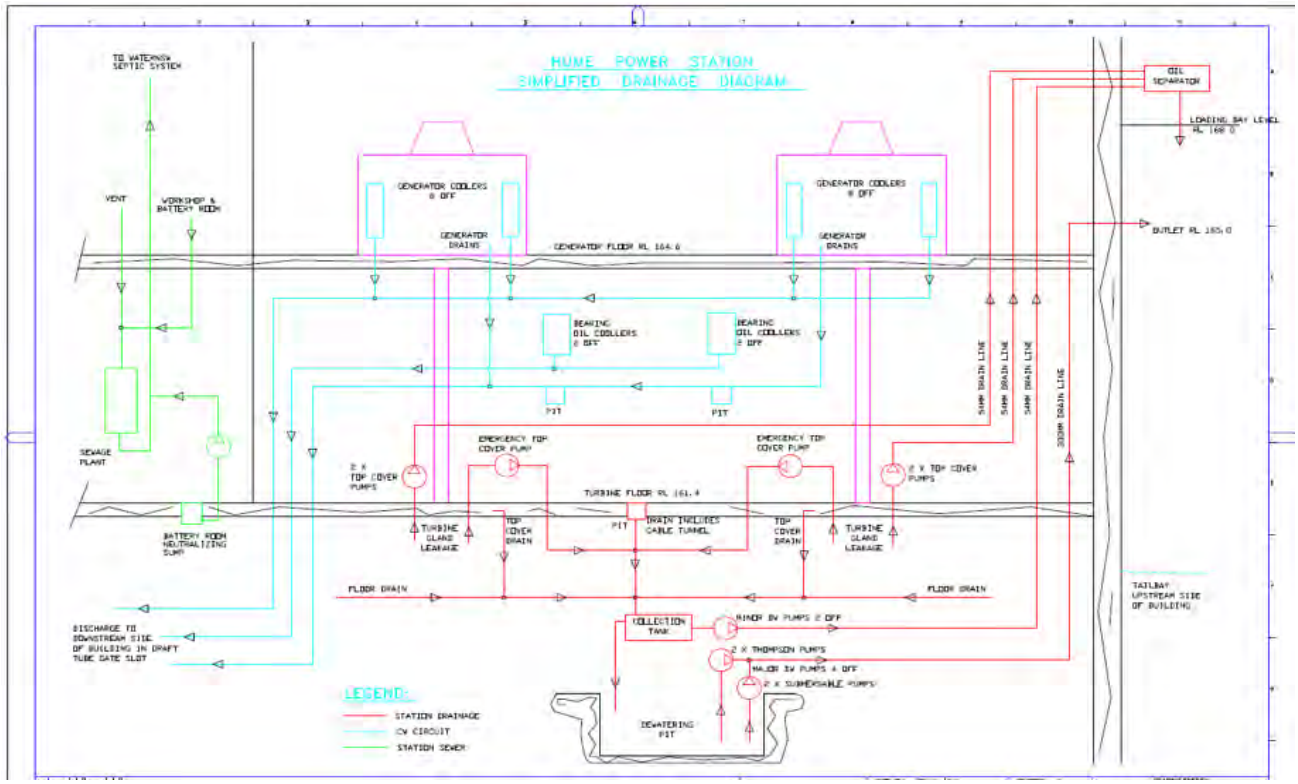
Hume Power Station is located at Hume Dam on the Murray River within the Murray–Darling Basin irrigation system, which is managed by WaterNSW. The station utilises regulated irrigation releases to generate electricity that is distributed to the NSW and Victorian electricity networks via TransGrid and AusNet Services. The site serves as the operational base for personnel responsible for the power station, switchyard, and associated infrastructure, while the dam and surrounding facilities within the compound remain under WaterNSW management. Access to the site is via WaterNSW gates on Murray Street at Lake Hume Village, approximately 14 km east of Albury.

The power station comprises two 29 MW generating units housed within a reinforced concrete structure, part of which extends approximately 20 metres below ground and is integrated into the northern base of Hume Dam. A cable tunnel of approximately 120 metres connects the power station to the switchyard, carrying electrical cables including the primary 11 kV circuits. The switchyard contains two 11 kV, 66 kV, and 132 kV transformers and associated switchgear, supplying the NSW grid at 132 kV and the Victorian grid at 66 kV. Transformer bunds drain to a primary containment tank with manual pump-out capability, discharging to a secondary containment tank located to the southwest. Operations are controlled locally and remotely via a segregated operational technology network with no direct internet access. The site is located within Map Sheet Bethanga 8325-4-4, Zone 55, with GPS coordinates S 36°06’22.6”, E 147°01’56.8”.

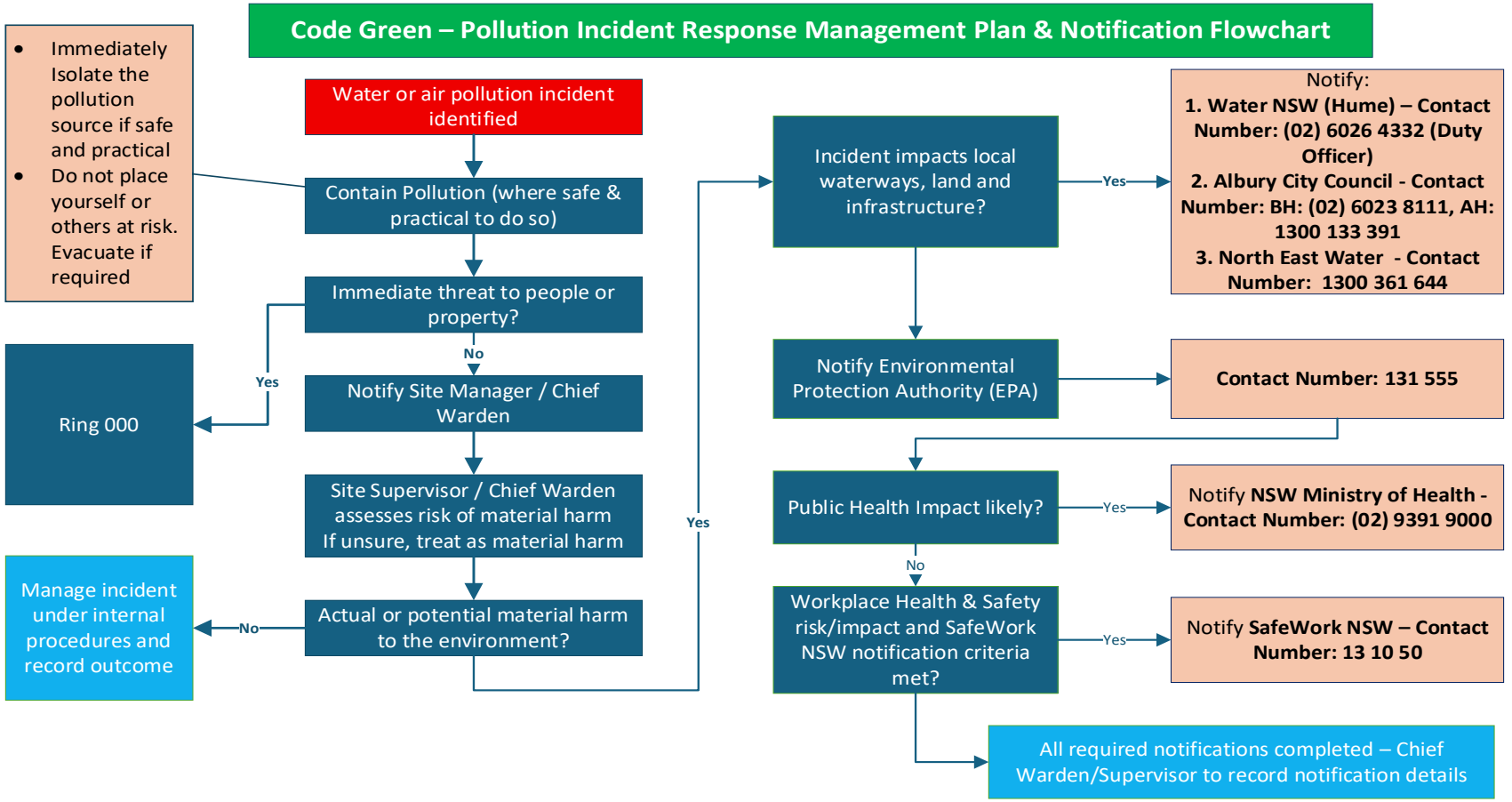
14.1.1 External Stormwater, Contaminated Water and Sewer Layout



14.1.2 Simplified Drainage Diagram



14.2 Appendix B - External Authority Notification Flowchart



SPILLS TO WATERWAYS

- All spills to waterways must be notified immediately as per the site PIRMP notifications protocols.
- To prevent the spread of pollutants downstream, generation from the Power Station should cease (where practicable) to limit flows in the Murray River.
- The spill response trailer at the back of the Power Station holds containment booms for use on waterways. These materials should be made available to Emergency Services to contain the spread of pollutants downstream. Employees are not to enter the River.

Notes:

1. Notification of the Environment Protection Authority is required for all pollution incidents involving actual or potential material harm to the environment.
2. Additional authorities must be notified where required based on public health, workplace health and safety, or local impact considerations.
3. All notifications must be recorded, including the time of notification, authority contacted, and person spoken to.

14.3 Appendix C - Pollution Risks, Substances, Impacts and Control Measures

Activity / Apparatus	Risk	Substance(s)	Impacts	Control Measures
Switchyard transformers	Transformer cooling water contaminated with oil leading to pollution of waters	Oil	• Compliance • Water • Reputation	• Transformer design • Gravel in pit • Inspections • Primary and secondary containment systems • EPA Licence monitoring requirements
	Transformer leak	Oil	• Compliance • Land & Water, • Reputation	• Alarms • Bunding • Primary and secondary containment systems • Regular routine inspections
	Transformer explosion and fire	Oil	• Air • Compliance • Financial implications • Health and Safety Land & Water • Reputation	• Gravel in pits • Explosion walls • Routine checks for leaks • Maintenance procedures • Primary and secondary containment systems Transformer design • Hume Emergency Response Plan
General Contractor activities	Contractor undertaking an activity which causes an environmental impact	Various	• Air • Compliance • Flora and fauna • Health and safety • Land & Water • Reputation	• Contractor contracts and clauses • Contractor management by GSP Energy staff • Supervision • Risk assessment process • Site induction
Compliance with EPA Licence	Breach of licence conditions	• Oil • Particulates	• Compliance • Land & Water • Reputation • Financial implications	• Modification of secondary containment system • Compliance audits • Policies and procedures • Routine inspections • EPA Licence monitoring requirements • Training
	Failure of systems leading to an externally reportable incident	Oil	• Compliance • Land & Water Reputation • Financial implications	• Alarms for instrument failure • Backup instruments operational • Bunding • Contaminated water system • Drains to contaminated water pits

Activity / Apparatus	Risk	Substance(s)	Impacts	Control Measures
Hume Power Station Operations	Fire in Hume Power Station	• Oil • Particulates • Smoke	• Air • Compliance • Financial implications • Reputation • Water	• Automatic fire suppression systems • Water mist system • Monthly inspections • Hume Emergency Response Plan
	Oil releases within station impacting river	Oil	• Compliance Financial implications • Flora and Fauna, Reputation • Water	• Oil spill materials available • Training • Drainage pit • Oil escape detectors • Routine checks and restocking skimmers monthly
	Turbine failure resulting in uncontrollable oil release	Oil	• Compliance • Financial implications • Flora and Fauna Reputation • Water	• Routine inspections • Local system knowledge • Oil spill materials available • Training
Weed Management	Inadequate weed control resulting in breach of Noxious Weeds Act	Noxious weeds	• Compliance • Flora and Fauna	• Training • Appropriate weed control practices
Mercury Switches	Mercury spill	Mercury	• Compliance • Health and Safety • Water • Reputation	• Oil spill materials • Specific mercury spill kit • Hume Emergency Response Plan

14.4 Appendix D – PIRMP Annual Testing History

Date	Conducted By	Test Type	Recommendations	Next Test Due Date
9 – 13 October 2014	Nicola Foran	Desktop Simulation	Updated various sections to reflect change in licence holder	September 2015 (Practical Exercise)
28 June –17 July 2015	Nicola Foran	Desktop Simulation	Update various sections to include additional detail.	August 2015 (Practical Exercise)
23 September 2015	Robert Sigmund	Practical Exercise	In conjunction with testing of the Hume Emergency Response Plan. No changes required.	September 2016 (Desk Top Simulation)
21 October 2016	Nicola Foran & Julz Lawrence	Desktop Simulation	March 2017 (Practical Exercise)	Prior to 31 October 2017
18 October 2017	Thurgoona Training Academy	Practical Exercise	In conjunction with testing of the Hume Emergency Response Plan. No changes required.	Prior to 31 October 2018
28 August 2018	Thurgoona Training Academy	Practical Exercise	In conjunction with Warden training	Prior to 31 October 2019
25 June 2019	Shaun Coffey	Desktop Simulation	Reviewed all content following recent oil spill event	Prior to 31 October 2020
10th July 2021	Hume site operations team	Practical Exercise	No changes required.	Prior to 31 October 2021
2nd August 2022	GSP operations team	Practical Exercise	No changes required.	Prior to 31 October 2022

12 February 2026	Hume Site and HSE Team	Practical Exercise	PIRMP was tested following the 22 Oct 2025 oil leak incident after the comprehensive PIRMP review and update and inclusion of Code Green in the Site ERP. Feedback from the exercise used to further streamline the Code Green response flowchart.	Prior to 31 October 2027