

PIRMP – Lane Cove Tunnel

A Transurban Group plan

Document code

LCT-HSE-PL-1

Approval authority

HSE Manager – NSW & WestConnex

Document owner

Head of Tollaust

Document author

HSE Advisor (NSW)

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Revision history

Date	Version*	Author	Nature of change (including review history)
24-Feb-20	0.1	Liam O'Grady, HSE Advisor	Internal Development.
30-Mar-20	0.2	Liam O'Grady, HSE Advisor	Review to address comments.
21-Apr-20	1.0	Craig Watson, HSE Manager, NSW and WestConnex	Reviewed and approved for publishing.
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* An automatic version of this document will be stored upon modifying. Before printing please insert the current version number into the table above and into the footer.

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1. Abbreviations, acronyms and definitions

Term or acronym	Description
LCT	Lane Cove Tunnel
DECC, DEC, EPA	Department of Environment and Climate Change, Department of Environment and Conservation, Department of Environment and Climate Change and Water (DECCW), Office of Environment and Heritage (OEH) are all previous names of the NSW government department now known as the Environment Protection Authority (EPA)
DNR (DLWC)	Old NSW Department of Natural Resources (formerly Department of Land and Water Conservation). Most responsibilities are now incorporated into Department of Environment, Climate Change.
DPIE	Department of Planning Industry and Environment
EMR	Environmental Management Representative.
HSE	Health, Safety and Environment
MCoA	Minister's Conditions of Approval
O&M	Operations and Maintenance
ACT	Protection of the Environment Operations Act 1997
OEMP	Operational Environmental Management Plan
OMCS	Operations Motorway Control System
PMCS	Plant Management Control Systems
SWMS	Safe Work Method Statement
TMCS	Traffic Management Control System
Ventia	Ventia Contractors Australia Pty Ltd (formerly Leighton Services) Maintenance Contractor

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2. Introduction

2.1 Background

LCT-MRE holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for two ventilation stacks associated with the Lane Cove Tunnel. As per the Protection of the Environment Operations Act 1997 (the POEO Act), LCT-MRE as holder has prepared the following Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the Protection of the Environment Operations Act 1997 and in-line with Protection of the Environment Operations (General) Regulation 2009 95A (1) that restricts this plan to only cover pollution events from “Road Tunnel Emissions”.

If a pollution incident occurs 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, LCT-MRE will immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act. A written copy of this plan is kept at the Lane Cove Tunnel Office (5 Sirius Road, Lane Cove West) and is made available on request by an authorised NSW EPA Officer and publicly at (<https://www.linkt.com.au>).

2.2 Objectives

The objectives of this PIRMP are to:

- Minimise and control the risk of an emission pollution incident at the project by requiring identification of risks and the development of planned actions to minimise those risks; and
- Ensure comprehensive and timely communication about an incident to the Environment Protection Authority (EPA) and other relevant government authorities and the community who may be affected by the impacts of an emission pollution incident.

2.3 Description

Both road tunnel emission outlets work by exploiting the natural mixing of the atmosphere to efficiently disperse air pollutants this results in nearby residents experiencing little, if any, exposure to emissions. The first ventilation outlet is located at 5 Sirius Road, Lane Cove and the second stack located at 6 Marden Street, Artarmon as pictured. The broader location is shown in *Appendix B – Broader Location Map*:



Figure 1: Location Map: Sirius Road

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Figure 2 Location Map: Marden Street

2.4 Incident Notification Information

The relevant information about a pollution incident required under S150 of the Protection of the Environment Operations Act 1997 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, and
 - 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 immediately after it becomes known.

2.5 Testing, Review and Amendment

The PIRMP will be tested in accordance with the requirements set out in the Protection of the Environment Operations (General) 2009 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; and
- Any such test is to be carried out:
 - At least once every 12 months; and
 - Within 1 month of any pollution incident occurring.

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The LCT as a whole has a number of potential scenarios that may impact the environment; detailed in the *LCT-EV-PL-1 Operational Environmental Management Plan for Lane Cove Tunnel; Appendix E Significant Environmental Impacts and Risks*. PIRMP testing will be limited to ventilation outlet exceedance scenarios.

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

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

3. Inventory of Pollutants

There will be no pollutants kept on the premises for use during operation and maintenance. As per the requirements set out in the Act; there will be no pollutant register detailing pollutant type, maximum quantity and location of potential pollutants appended to the PIRMP.

4. Roles and Responsibilities

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

Role	Responsibility	Contact Details (24hr)
LCT Incident Control Room – TCRO	<ul style="list-style-type: none">• Responsible for managing the response to a pollution incident.• Responsible for activating the PIRMP.• Authorised to notify relevant authorities under section 148 of the POEO Act.	13 31 11

5. Hazards to the Environment and Human Health

Due to the licence relating to the scheduled activity 'Road Tunnel Emissions' the following hazards related to the environment and human health are exclusively:

- Exceedance of the CO exceedance limits – Stack
- Exceedance of NO2 exceedance limits – Stack
- Exceedance of PM10 exceedance limits – Stack
- Exceedance of VOC exceedance limits – Stack

As required under the Act; the likelihood of the abovementioned environmental hazards are detailed under *LCT-EV-PL-1 Operational Environmental Management Plan for Lane Cove Tunnel Appendix E Environmental Aspects Register* in the publicly available OEMP.

5.1 Controlling Hazards to the Environment

In order to mitigate the abovementioned hazards LCT-MRE implements constant air monitoring at the outlets in accordance with the conditions of the EPL and MCoA. Further physical controls are detailed in

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5.3 *Environmental Pollution Control Equipment*. Site personnel are also trained in and implement the following related management plans to control factors that may influence an exceedance with outlet limits:

Document #	Description
LCT-EV-PL-1	<i>Operational Environmental Management Plan for Lane Cove Tunnel</i>
LCT-EV-PL-6	<i>Air Quality Management Sub-Plan for Lane Cove Tunnel</i>
LCT-OI-MP-3	<i>Incident Management Plan – Air Quality</i>

→ Specifically, in the *OEMP Table D.1 Significant Environmental Aspects, Impacts and Risks* describes the environmental impact and the mitigation, management and monitoring strategies that are being employed to manage hazards.

5.2 Controlling Hazards to Human Health

To minimise the risk of harm to people at the premises the following measures are implemented as per Transurban minimum requirements:

- All person(s) accessing site are required to wear the appropriate PPE including:
 - Long pants;
 - Long sleeved shirt;
 - Hard hat;
 - High visibility vest;
 - Steel capped boots; and
 - Safety glasses.
- All person(s) are made aware of the PIRMP including notification/response procedures during site induction.
- All personnel are made aware of all site exits and emergency evacuation points.
- The community are to be notified of any changes to works that may affect them, including works outside of normal working hours.

5.3 Environmental Pollution Control Equipment

As per s6.2 of *LCT-EV-PL-1 Operational Environmental Management Plan for Lane Cove Tunnel* the tunnel's air quality is managed by the use of a fan circulation system that links to ventilation outlets.

The equipment is operated by Tollaust and continuous air quality monitoring is undertaken.

Alarms and alerts are generated at various point where the asset is operating within a set percent of the exceedance limits. The Traffic Control Room is able to adjust the fans and ventilation system to improve the air quality in the tunnel.

5.4 Process to be taken during and immediately after a Pollution Incident

The process outlined in *LCT-OI-MP-3 Incident Management Plan – Air Quality* (attached as Appendix C) is followed during and immediately after a Road Tunnel Emission incident.

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5.5 Regulatory Authorities

As above the TCRO or equivalent is responsible for notifying relevant authorities. The current contact details of the relevant authorities under section 148 of the POEO Act include;

Authority	Email	Phone
EPA (NSW)	info@epa.nsw.gov.au	131 555
Health (NSW)	ENHWU@doh.health.nsw.gov.au	(02) 9391 9000
DPIE	rob.sherry@planning.nsw.gov.au; info@environment.nsw.gov.au;	1300 305 695
WorkCover NSW	contact@safework.nsw.gov.au	131 050
Fire and Rescue	contact@frnsw.nsw.gov.au	1800 679 737

5.6 Community Stakeholders

The requirements surrounding community consultation and involvement are detailed within *LCT-CS-PL-1 Community Involvement Plan* which was required as part of the conditions of approval.

In order to ensure consultation with each community stakeholder is effective, different stakeholders will be notified depending on the severity of the incident and in terms of whether they would be directly affected by the incident.

5.7 Staff Training

All TCROs receive training during the induction process and to ensure that they can effectively implement the 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 an outlet exceedance;
- Appropriate immediate action to control and contain an incident including provision of contact details of relevant personnel for notification; and
- Staff must be provided with information to reflect the following hierarchy in their response to an environmental incident.

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6. 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)]	5.0 Hazards to the Environment and Human Health
3.3.2 Pre-emptive actions to be taken [clause 98C(1)(c)]	5.1 Controlling Hazards to the Environment 5.2 Controlling Hazards to Human Health
3.3.3 Inventory of pollutants [clause 98C(1)(d) and (e)]	3.0 Inventory of Pollutants
3.3.4 Safety equipment [clause 98C(1)(f)]	5.3 Environmental Pollution Control Equipment
3.3.5 Contact details [clause 98C(1)(g) and (h)]	4.0 Roles and Responsibilities 6.2 Regulatory Authorities
3.3.6 Communicating with neighbours and the local community [clause 98C(1)(i)]	7.0 Community Stakeholders
3.3.7 Minimising harm to persons on the premises [clause 98C(1)(j)]	5.2 Controlling Hazards to Human Health
3.3.8 Maps [clause 98C(1)(k)]	2.3 Description Appendix D: Broader Location Map
3.3.9 Actions to be taken during or immediately after a pollution incident [clause 98C(1)(l)]	5.4 Process to be taken during or immediately after a Pollution Incident
3.3.10 Staff training [clause 98C(1)(m)]	7.4 Staff Training

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7. Appendix B: Broader Location Map

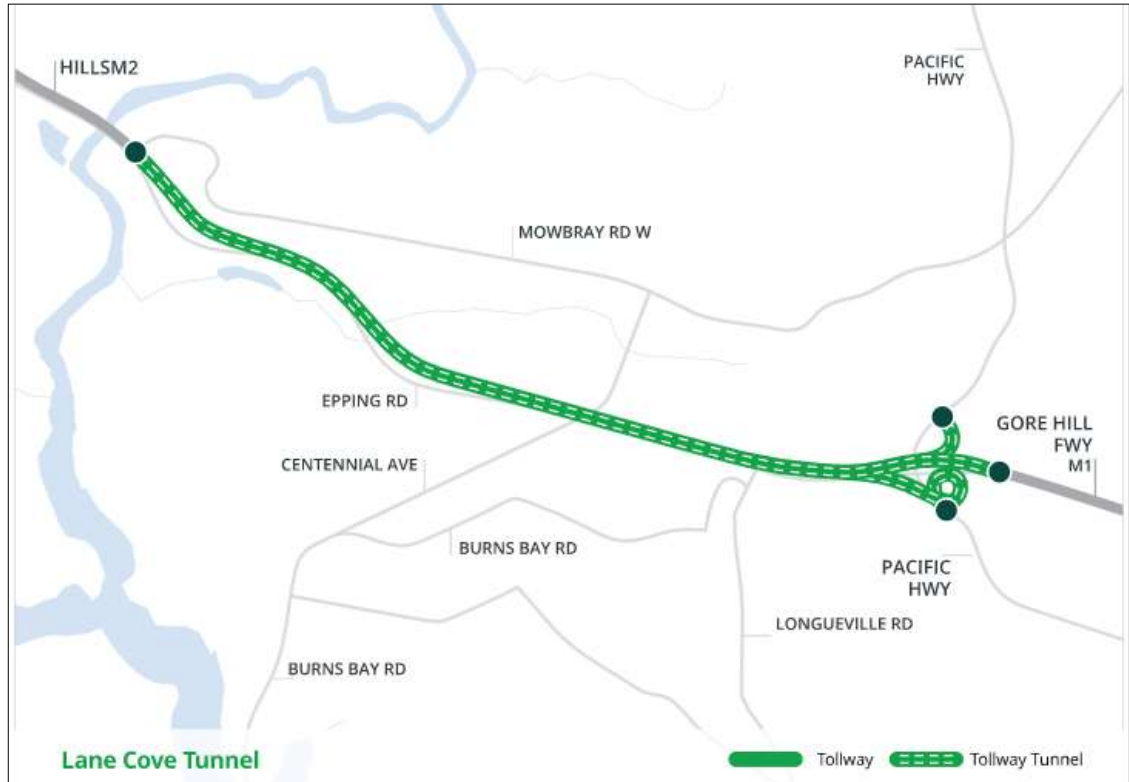


Figure 3 Broader Location Map

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8. Appendix C: Incident Management Plan – Air Quality

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INCIDENT MANAGEMENT PLAN – AIR QUALITY

DOCUMENT No: LCT-OI-MP-3

1 PURPOSE

The purpose of this procedure is to detail the steps taken by the LCT Tunnel Control Room Operators (TCRO) in managing the situation where the automatic ventilation system is not able to maintain in tunnel conditions below the alert levels specified in Table 1. It may be initiated alone or as part of a response to another incident, be that traffic or system/equipment related. The Manager NSW Operations must immediately be notified of any exceedances of the maximum allowable exposure or emission levels summarised in Table 1.

This plan excludes the monitoring of stack emissions in terms of tonnes per annum, and methodology for managing the tunnels contribution to ambient levels. Both of these issues will be covered by procedures linked to the Operational Environmental Management Plan (OEMP).

2 AUTHORITY AND DISTRIBUTION

- Responsible Agency (RA)
 - Tunnel Control Room Operators (TCRO) (On behalf of LCT-MRE)
 - Incident Response Crew (IRC) (Egis)
- Support Agencies (SA)
 - New South Wales Roads and Maritime Services (RMS)
 - Transport for New South Wales - Transport Management Centre (TfNSW-TMC)

This Incident Management Plan is distributed among the following entities:

- Those nominated above;
- New South Wales Police
- Fire and Rescue NSW (FRNSW)
- New South Wales Ambulance Service
- The M2 Hills Motorway
- The Sydney Harbour Tunnel (SHT)

3 REFERENCE DOCUMENTATION

LCT Ministers Conditions of Approval
LCT SWTC Appendix 5
Ventilation Control System – AL-RP-GL-OM02-1020-B-0
CO Transit Time Calculation Management AL-RP-GL-OM02-1021-C-0

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Ventilation Systems Concept Design - AL-RP-TU-VE01-0001-A-1

Ventilation Concept Design – PB-RP-TU-ME01-0102-B-1

NOTE:

When applying this Incident Management Plan (IMP), the Operators may use their training, experience, common sense and best judgement, with due regard to dynamically assessing risk, to deal with the situation in the most effective and safest way practicable. Where there is deviation from the procedure, this shall be noted in the incident log and the circumstances subsequently reviewed by the Operations Management Team.

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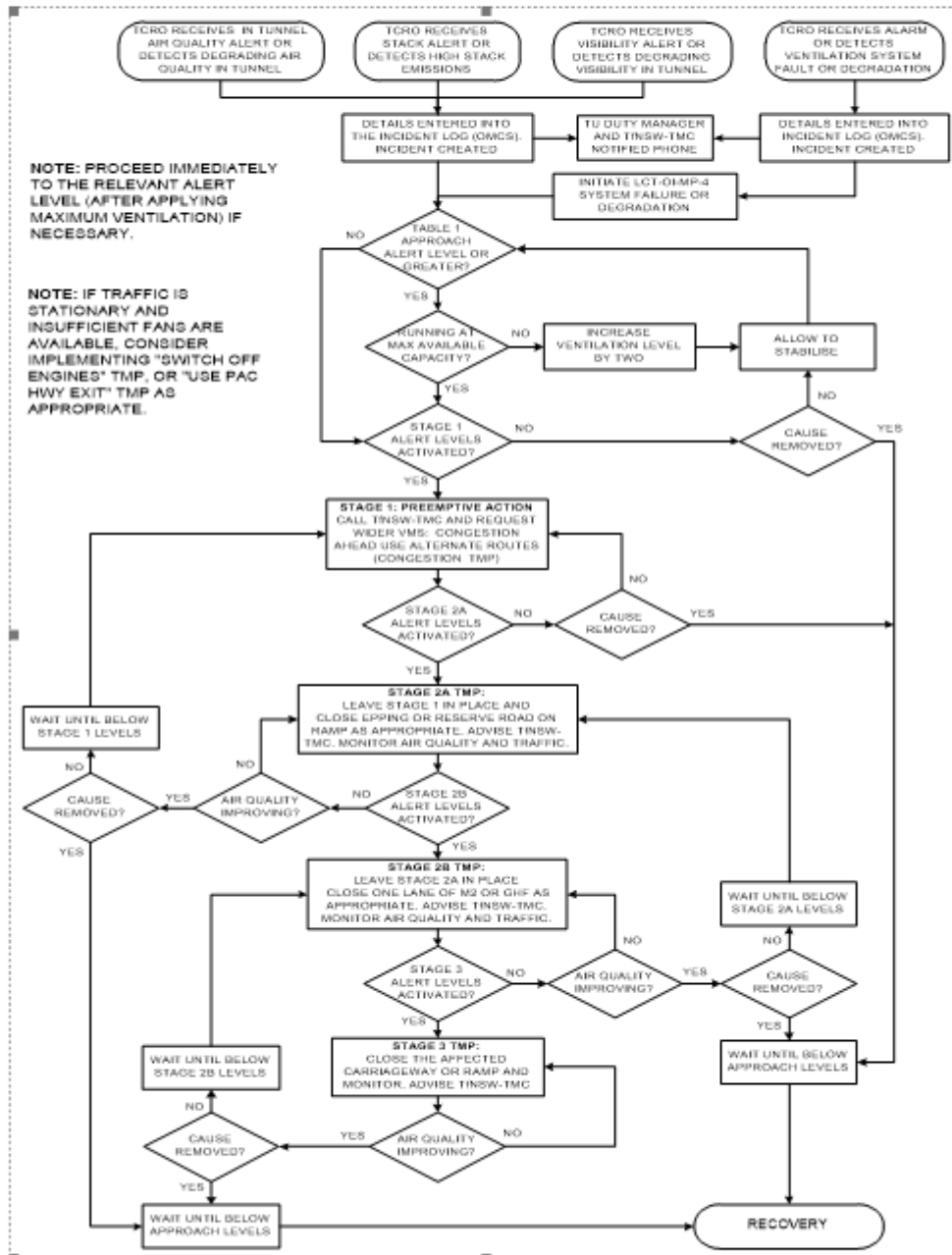
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4 RESPONSE FLOWCHART



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5 RESPONSE DETAIL

Often these incident management plans may call for the initiation of other IMP's to run in parallel to the initial plan. In this case operator discretion is required to prioritise the steps of each plan in managing the incident. All initiated IMP's must be carried through to recovery.

Once initiated, the TMP is to be continuously monitored and updated in line with the incident priorities listed below. If additional lanes are closed (or opened) update the TU Duty Manager, TfNSW-TMC and relevant adjoining motorways by phone.

Monitoring of air quality in the tunnel is a continual process. The plan is aimed at restricting the number of vehicles entering the tunnel when there is insufficient ventilation capacity to maintain operations within air quality goals.

The Lane Cove Tunnel philosophy in managing Air Quality alerts will be to first utilise any remaining ventilation capacity before closing lanes if degradation continues. The process of manually ramping up the ventilation is triggered by the approach alert (as seen in Table 1). If the levels climb higher than those for the approach alert, Stage 1, 2A, 2B, and 3 closures will be implemented as appropriate, while maintaining maximum ventilation, until the conditions improve to below approach levels. If the air quality degrades rapidly to stage 3 levels for example, the operator must immediately implement that stage i.e. there is no need to carry out intermediate stages of traffic management in that case.

The plan may be implemented for either carriageway independently, or both at once.

Table 1 (below) details the various exposure and emission alert levels. At present they are estimates based on the operators current understanding of the ventilation system and air quality standards presented in the MCoA and SWTC. Operational experience is required to further refine the figures.

Table 1: Preliminary air quality alert levels for the various parameters set out in the MCoA and SWTC.

Alert Levels	In Tunnel CO (ppm)			Sirius Stack (mg/m ³ /30mins)				Marden Stack (mg/m ³ /30mins)				Visibility (m ⁻¹) Extn. Coef. K
	30 mins ¹	15 mins ²	3 mins ³	CO	NO _x	PM ₁₀	VOC	CO	NO _x	PM ₁₀	VOC	
Approach	30	35	60	45	23	0.9	3.5	45	17	0.5	3.5	0.068
Stage 1	35	60	80	80	25	1.1	4	50	19	0.7	4	0.0935
Stage 2A	40	70	125	54	27	1.3	4.5	54	21	0.9	4.5	0.097
Stage 2B	45	80	150	56	29	1.4	5	58	23	1	5	0.099
Stage 3	48	84	175	60	31	1.5	5.5	60	24	1.1	5.5	0.011
Limit	50	87	200	62.5	32.8	1.6	6.3	62.5	25.7	1.2	6.3	0.012

¹ 3 minute rolling average recalculated every minute at each air monitoring location as per MCoA 161, representing the highest CO readings in the tunnel.

² 15 minute rolling average exposure recalculated every minute for all present COTT objects. (Ref. MCoA 160)

³ 30 minute rolling average exposure recalculated every minute for all present COTT objects. (Ref. MCoA 160)

At all times the priorities of the TCRO are as follows:

- Safety of tunnel occupants and operators.
- Containing the incident.
- Protection of the tunnel asset.

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- Re-establishment of normal operating conditions.

5.1 A. Detect / Initiate, Confirm

- A1. TCRO receives air quality alert, detects poor or degrading air quality, or high emission levels. Proceed to A3, A4, then B1.
- A2. OR TCRO receives alarm or detects ventilation system fault or degradation. Proceed to A3, A4 then A5.
- A3. Record the location, nature and impacts of the incident. Create incident log in the OMCS.
- A4. Duty Manager and TfNSW-TMC notified by phone of the incident created in A3 above.
- A5. Initiate LCT-OI-MP-4 – System Failure or Degradation. Proceed to B1.

5.2 B. Utilise Remaining Ventilation Capacity

- B1. Refer to Table 1. Is the air quality at the approach level or greater? If YES, Proceed to B2, If NO, Proceed to B5.
- B2. Is the ventilation system operating at the maximum available capacity for the relevant carriageway(s)? If YES, Proceed to B5, If NO, Proceed to B3.
- B3. Increase the ventilation level for the affected direction by two.
- B4. Allow some time for airflow stabilisation. Return to B1.
- B5. Refer to Table 1. Are the Stage 1 alert levels activated? If YES, Proceed to C1, If NO, Proceed to B6.
- B6. Has the cause of the air quality concern been removed? If YES, Proceed to C9, If NO, Return to B4.

Note: In making this decision consider such factors as the time of day and the level of rectification of the cause of the air quality concern. An extra lane may now be available past the incident scene for example.

5.3 C. Implement Traffic Management

- C1. Implement **Stage 1** TMP. Call TfNSW-TMC and request congestion TMP on wider VMS.
- C2. Refer to Table 1. Are the Stage 2A alert levels activated? If YES, Proceed to C4, If NO, Proceed to C3.
- C3. Has the cause of the air quality concern been removed? If YES, Proceed to C13, If NO, Return to C1.
- C4. Implement **Stage 2A** TMP. Leave Stage 1 in place. Close Epping Road or Reserve Road on ramp as appropriate. Notify TU Duty Manager and TfNSW-TMC. Monitor the air quality and traffic.
- C5. Refer to Table 1. Are the Stage 2B alert levels activated? If YES, Proceed to C8, If NO, Proceed to C6.
- C6. Is the air quality improving? If YES, proceed to C7, If NO, Return to C4.

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- C7. Has the cause of the air quality concern been removed? If YES, Proceed to C17, If NO, Proceed to C8.
- C8. Wait until the situation has improved to below Stage 1 levels. Return to C1.
- C9. Implement **Stage 2B** TMP. Leave stage 2A in place. Close one lane of the M2 or the GHF as appropriate. Notify TU Duty Manager, TfNSW-TMC and relevant adjoining motorways. Monitor the air quality and traffic.
- C10. Refer to Table 1. Are the Stage 3 alert levels activated? If YES, Proceed to C15, If NO, Proceed to C11.
- C11. Is the air quality improving? If YES, proceed to C12, If NO, Return to C9.
- C12. Has the cause of the air quality concern been removed? If YES, Proceed to C13, If NO, Proceed to C14.
- C13. Wait until the situation has improved to below Approach levels. Proceed to D.
- C14. Wait until the situation has improved to below Stage 2A levels. Return to C4.
- C15. Implement **Stage 3** TMP. Close the affected carriageway(s) as appropriate. Notify TU Duty Manager and TfNSW-TMC. Monitor the air quality and traffic.
- C16. Is the air quality improving? If YES, proceed to C17, If NO, Return to C15.
- C17. Has the cause of the air quality concern been removed? If YES, Proceed to C18, If NO, Proceed to C19.
- C18. Wait until the situation has improved to below Approach levels. Proceed to D.
- C19. Wait until the situation has improved to below Stage 2B levels. Return to C9.

5.4 D. Recovery

- D1. Undertake site clean-up and condition assessment of tunnel assets as necessary.
- D2. Return all OMCS systems to pre-incident state or normal operating state as appropriate.
- D3. Notify TU Duty Manager, TfNSW-TMC and relevant adjoining Motorways that tunnel is open and to what extent.
- D4. Log incident in the incident database, including and any other relevant information not added previously.
- D5. Review the recorded air quality data and notify the operations manager of any recorded exceedances immediately.
- D6. If it is felt that faulty or un-calibrated monitoring equipment generated the concern, notify the maintenance manager and raise the service request in MAXIMO.
- D7. Conduct de-brief with TU Management, TfNSW, RMS and other stakeholders if requested.

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6 Traffic Management Plans (TMPs)

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Air Quality TMPs.xls

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Read and Acknowledge

If required for training purposes, please indicate that you have read this document by selecting the link below:

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