POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN SUPPORTING STATEMENT

JOHN GILBERT WATER TREATMENT PLANT AND RETICULATION SYSTEM

PREPARED FOR:

DUBBO REGIONAL COUNCIL

JUNE 2023

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Date	Details of Changes	Version
14/06/2023	Contact details updated.	1.4
16/03/2018	Document updated to address EPA audit findings	1.3
29/08/2017	Document Reviewed – Dubbo Regional Council	1.2
19/05/2016	Document Reviewed – Western Plains Regional Council	1.1
20/08/2012	Original Document	1.0

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Pollution Incident Response Management Plan

Foreword

This is the Supporting Statement for the Pollution Incident Response Management Plan (PIRMP). The PIRMP is a functional document. It is designed to assist personnel at the John Gilbert Water Treatment Plant (WTP) to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident.

The structure and scope of this Supporting Statement and PIRMP reflects the requirements of the Environmental Protection Authority's *Guidelines: Preparation of pollution incident response management plans, March 2012* and in doing so embodies the principles of best practice environmental management.

Utilisation of this PIRMP aims to improve, monitor and demonstrate environmental performance. If you have any suggestions for amendments, additions or improvements, please discuss these with your supervisor.

.....
Dubbo Regional Council
Manager Water Supply & Sewerage

Date: .....

Introduction

1.1 PURPOSE

This Supporting Statement and PIRMP have been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflects the requirements specified in the Environment Protection Authority's (EPA's) *Guidelines: Preparation of pollution incident response management plans, March 2012.*

The PIRMP details:

- Procedures for notifying a pollution incident to relevant persons;
- Actions to be taken to reduce and/or control pollution; and
- Procedures for co-ordinating those notified and any action taken in combating the pollution.

1.2 DEFINITION OF 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 1997:

> *"(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."*

1.3 IDENTIFIED POLLUTION INCIDENT RISKS

The primary potential hazards to human health or the environment associated with the activity undertaken at this site – i.e. '*Pollution Incidents*' - include the following:

- Chemical leak or spillage;
- Rupture of process vessels;
- Failure of sludge drying pond results in discharge to environment;
- Failure of backwash pond results in discharge of backwash to environment;
- Malfunction of plant and machinery results in discharge to environment; or
- Acts of vandalism or target of terrorist activity at the WTP.

Site Overview

2.1 SITE OVERVIEW

The John Gilbert Water Treatment Plant (WTP or the 'facility') is owned and managed by Dubbo Regional Council. The 9.12 hectare property is zoned SP2 Infrastructure (Water Supply Systems) under *Dubbo Regional Council's Local Environmental Plan 2011*.

The Environment Protection Authority (EPA) has issued Environment Protection Licence 11694 in accordance with *Section 5.7 of the Protection of the Environment Operations Act 1997.* The licence requires that the total discharged to the Macquarie River must not exceed 1000 megalitres per year.

Furthermore, an Emergency Response Plan for the *John Gilbert Water Treatment Plant Chlorination System, November 2010* was prepared which details the procedures, defines the notification events and lists the organisations to be contacted.

2.2 SITE CHARACTERISTICS

The WTP services the City of Dubbo. The rectangular shaped site is approximately 9.12 hectares in area and located on Macquarie Street approximately 2 kilometres south of the Dubbo Central Business District (CBD) (see Drawing **01B_EV01**). It comprises DP 185371 (Lot 1), DP 430727 (Lot 1), DP 545272 (Lot 7) and DP 754308 (Lot 347). The WTP contains water filtration infrastructure which serves a connected population of approximately 35,000. Access is provided to the facility via a bitumen driveway extending from Macquarie Street. The site is highly modified however it generally slopes towards the Macquarie River, which forms the western boundary of the facility.

The WTP extracts water both from the Macquarie River and the nearby borefields, and after treatment and the treated water is released to Dubbo for drinking, the remaining backwash water stored in the holding pond is utilised for irrigating the WTP grounds and Council parks and discharged under licence to the Macquarie River. The facility has a current licence to discharge to the Macquarie River of up to 1,000 megalitres (ML) per year.

The area surrounding the facility to the east and south is predominantly residential land. Directly to the north is the Council owned and operated Water Supply and Sewerage Depot. The land immediately to the west is the Macquarie River and then rural pasture land owned by Taronga Western Plains Zoo.

The nearest residential property to the facility is located on the eastern side of Macquarie Street approximately 25m east of the main site entrance. Further details of neighbouring properties (residential, commercial and industrial categories) are provided in Drawing **01B_EV02**.

Access to the WTP is via Macquarie Street, which is a two lane sealed road. From Macquarie Street the facility is accessed by a primary sealed road. Within the site, sealed roads and formed gravel access roads lead to the various sludge drying beds, backwash pond and plant equipment.

The WTP is fenced along the southern, northern, eastern and western boundaries with 2.4m man-proof security fence.

The concentration of pollutants discharged is required to be monitored by the EPL at two locations in the WTP (see drawing **01B_EV03**).

The sludge drying beds and backwash pond have altered the local topography significantly, creating numerous rises, as such, the current site no longer retains the natural topography but is designed to channel surface water and minimise off-site impact of the WTP operations.

The site topography and drainage have been engineered to ensure that there is negligible stormwater runoff into and out of the site, thus minimising any off-site impact. Site generated surface water at operations near to the site entrance is channelled through the centre of the premises via a stormwater drain before entering the Macquarie River approximately 150m to the west.

Banks of mature trees exist along the east and west site boundaries and between the sludge drying beds and the operations area near the site entrance act as visual and wind buffers.

2.3 SITE SUPERVISION AND CONTROL

The WTP is open to Council staff and associated contractors (but not the public) between 07:00 am and 4:00pm Monday to Friday. The WTP is not supervised at all times. Instead the entire facility generally runs automatically. Access to the site outside these hours (e.g. for special circumstances) is subject to the approval of the Manager Water Supply & Sewerage.

During normal working hours the facility is staffed by qualified and experienced personnel. These include a Site Supervisor and up to two Site Operators. Two site Operators are generally present during normal working hours. The operators' responsibilities include response to alarms, fault identification, trouble shooting and determination of critical control set-points. Site Operators carry out a site inspection at least once a working day to check the WTP is operating effectively and efficiently.

Automatic security gates are in place at the main access point to the facility which ensures entry is only possible with Council authorisation and supervision. There are also three other entrance gates which provide alternative access to the premises from Macquarie Street, although all three of these gates are generally locked at all times. All gates are locked outside of normal working hours except for when approved by the Manager Water Supply & Sewerage in special circumstances. The site is also monitored by CCTV with five cameras on the Control Room building looking towards plant equipment and the main site entrance at Macquarie Street, and also motion censored lighting on the Control Room and Chlorine Room to prevent vandalism. Furthermore, all doors at the site are monitored, there is a security patrol undertaken every night and the site is monitored by specialist security contractors 24 hours per day. Council maintains the access roads around the facility and Council staff are to be responsible for internal traffic control.

The WTP consists of the following elements:

- Aeration;
- Clarification;
- Recarbonation and Filtration; and
- Drinking Water Released and Backwash Re-used.

The water extracted from the nearby borefields is first aerated to reduce hardness.

Water extracted from the nearby borefields and Macquarie River is then clarified in two clarifier tanks by applying ferric chloride and polyelectrolyte. Soda ash and lime is also applied to balance the pH. The clarification process settles out the floc, the sludge is drawn-off from the base of the clarifiers and pumped to the four sludge ponds. The sludge in the ponds is left to settle and the liquid to evaporate, eventually leaving only a sludge cake residue behind. This sludge cake is dug out and applied on nearby agricultural land.

The resultant clarified water is recarbonated with carbon dioxide and then filtered through sand and applied with chlorine and fluoride.

The clean water is detained and then pumped out into the City supply for drinking. The remaining backwash is either gravity fed back into the Macquarie River or used to irrigate the WTP grounds and Council parks.

A Daily Checklist for monitoring, recording activities and incidents that occur during operation of the facility is kept by the Site Supervisor.

2.4 SITE SAFETY EQUIPMENT

The WTP buildings are protected from fire by several hose reels, fire extinguishers and hydrants (see drawing **01B_EV03**).

In the event of a chemical spill, PPE is provided for on-site staff which consists of overalls, rubber boots, chemical goggles, face shields, safety shoes, elbow-length impervious gloves, splash aprons and air supplied respirators.

Risk Management and Pre-emptive Actions

3.1 INTRODUCTION

The following section outlines current operational procedures and design intended to minimise and manage risk. Members of staff working on site are responsible for being aware and notifying the Site Supervisor of any potential pollution incidents on the premises.

3.2 PRE-EMPTIVE ACTIONS

3.2.1 FIRES AT THE WTP

The potential for fires to occur at the site are controlled by:

- A security fence to prevent unauthorised access and acts of vandalism;
- Maintaining machinery in good working order to minimise risk of sparks; and
- Access to on-site firefighting equipment.

3.2.2 MECHANICAL FAILURE OF WTP

Site Operators carry out inspections at least once a working day to ensure plant and equipment are operating effectively and efficiently.

3.2.3 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

Automatic security gates are in place at the main access point to the facility (with three other entrance gates generally locked at all times) which ensures entry is only possible with Council authorisation and supervision. The boundary road fence along Macquarie Street limits unauthorised access outside operational hours. CCTV and motion censored lighting is installed as a deterrent. All staff are required to be vigilant and aware that the site is a potential target for vandalism, particularly by arsonists.

3.3 INVENTORY OF MAINTENANCE POLLUTANTS

The following pollutants can be stored on site in quantities required necessary for operations at the facility:

- Chlorine;
- Fluorosilicic Acid;
- Calcium Oxide (Quick Lime);
- Carbon Dioxide;
- Ferric Chloride Solution;
- Hydrochloric Acid; and
- Soda Ash.

Enclosed site plan **01B_EV03** provides details of where these chemicals are stored on the premises as well as those on bunded palettes.

3.4 POTENTIAL POLLUTION INCIDENTS

The potential main hazards to human health or the environment – i.e. '*Pollution Incidents*' - associated with the activity undertaken at this site include the following:

- Chemical leak or spillage;
- Rupture of process vessels;
- Failure of sludge drying pond results in discharge to environment;
- Failure of backwash pond results in discharge of backwash to environment;
- Malfunction of plant and machinery results in discharge to environment; or
- Acts of vandalism or target of terrorist activity at the WTP.

3.5 LIKELIHOOD, IMPACT AND CONTRIBUTING FACTORS TO POLLUTION INCIDENTS OCCURRING

Incidents can be classified as being of low, medium or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout.

The impact of an incident can be classed as low, medium or high based on the potential extent of off-site harm to humans and/or the environment.

The following assessment of potential pollution incidents detailed below is summarised in **Table 1.1** of **Appendix A**.

3.5.1 CHEMICAL LEAK OR SPILLAGE

Low Likelihood – The storage of potential harmful chemicals and accelerants such as operational and maintenance chemicals and fuels is undertaken on-site, however as these are located in secure and bunded facilities and only utilised by trained staff, the risk of chemical leaks and fire caused by chemicals is considered minimal. Refer to *Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010* for details.

High Impact – The impact is considered to be high due to the close proximity of the Macquarie River. Any harmful chemicals such as chlorine inadvertently discharged into the river could cause considerable harm to properties and environmental habitats for some distance downstream. If a fire were to initiate within the chemical storage areas there is a risk of igniting susceptible matures trees on-site and spread off-site to nearby residential properties. Refer to *'Potential Danger to Personnel'* on page 2 of *Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010* for details.

Contributing Factors – Human error, lack of site maintenance and/or a mechanical failure of plant and equipment. Factors which may increase chemical fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity. Refer to *'Hazards and Incidents'* on page 3 of *Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010* for details.

3.5.2 RUPTURE OF PROCESS VESSELS

Low Likelihood – The site has significant and advanced environmental protection measures and monitoring equipment which would alert operators to the incident.

Low Impact – The impact is considered to be low as any untreated water inadvertently discharged into the neighbouring environment should not be significantly harmful as the water is originally sourced from the Macquarie River and nearby borefields.

Contributing Factors - Increased risk from lack of site maintenance and/or a mechanical failure of plant and equipment.

3.5.3 FAILURE OF SLUDGE DRYING POND RESULTS IN DISCHARGE TO ENVIRONMENT

Low Likelihood – The sludge drying ponds are situated below ground level and so are not liable to embankment failure. The ponds are inspected daily.

Low Impact – The impact is considered to be low as any sludge inadvertently discharged into the neighbouring environment should not be significantly polluted or harmful as it is simply sediment originally from the Macquarie River and nearby borefields.

Contributing Factors - Increased risk from lack of sludge pond maintenance.

3.5.4 FAILURE OF BACKWASH POND RESULTS IN DISCHARGE OF BACKWASH TO ENVIRONMENT

Low Likelihood – The backwash pond is situated below ground level and so is not liable to embankment failure. The pond is inspected daily.

Low Impact – The impact is considered to be low as any backwash inadvertently discharged into the neighbouring environment should not be significantly polluted or harmful as the water is originally sourced from the Macquarie River and nearby borefields.

Contributing Factors - Increased risk from lack of backwash pond maintenance.

3.5.5 MALFUNCTION OF PLANT AND MACHINERY RESULTS IN DISCHARGE TO ENVIRONMENT

Low Likelihood – The site has significant and advanced environmental protection measures and monitoring equipment which would alert operators to the incident.

Low Impact – The site has significant and advanced environmental protection measures and monitoring equipment which should alert operators to the incident well before there is potential for impact outside the site. Any untreated water which reaches the nearby Macquarie River should not be significantly polluted or harmful as the water is originally sourced from the Macquarie River and nearby borefields.

Contributing Factors - Fire damage or poor maintenance of plant and equipment.

3.5.6 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

Low Likelihood – The site is enclosed by secure fencing, protected by motion-censored lighting and monitored by CCTV. Although the site is of limited strategic value as a potential target for terrorism, the premises may prove attractive to arsonists as it stores and uses often highly combustible chemicals.

Medium Impact – the site contains several mature trees and there are nearby residential properties susceptible to fire.

Contributing Factors - Increased vandalism risk during hours of closure and increased fire risk during sustained periods of hot and dry weather.

4.1 DEFINITION OF 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 1997*:

"(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."

4.2 NOTIFICATION OF POLLUTION INCIDENT

4.2.1 NOTIFICATION SPEED OF RESPONSE

The requirement for notification of a pollution incident has changed from *'as soon as practicable'* to *'immediately'*. In short, *'immediately'* means *'promptly without delay'*, but it does not mean undertaking notification ahead of doing what is necessary to make safe.

4.2.2 NOTIFICATION OF RELEVANT AUTHORITIES

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Site Supervisor:

1. Emergency Call Services

- Emergency Hotline Number (24 hours) 000*

*The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number.

2. Dubbo Regional Council

- Dubbo Regional Council Environmental Services 02 6801 4000
  (24 hour Emergency Hotline Number)

3. The Environment Protection Authority (EPA)

- Dubbo Regional Office 02 6883 5330
- Emergency Hotline Number (24 hours) 131 555

4. The Ministry of Health (via Public Health Units)

- Dubbo Regional Office 02 6841 5569
- Public Health Officer on Call (24 hours) 0418 866 397

5. WorkCover NSW

- Hotline Number 13 10 50

6. Fire and Rescue NSW

- Dubbo Rural Fire Service 02 68813900**

**If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the site supervisor is still required to follow that outlined above except for dialling 000.

A summary of the above pollution incident notification procedure is provided in **Document A** – Pollution Incident Decision Flow Chart in **Appendix A.**

4.2.3 INFORMATION TO BE NOTIFIED

Under section 150 of the *POEO Act 1997*, the information about a pollution incident that must be notified to relevant authorities is:

- 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; and
- Other information prescribed by the regulations.

Notification is required by the Site Supervisor immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

A Pollution Incident Reporting Form is produced in **Appendix A** to assist the Site Supervisor in correctly recording and notifying the relevant authorities as detailed in **Section 4.2.2** above.

4.3 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

All site personnel with relevant training must make every effort to contain the pollution incident on site, without putting themselves at risk of harm.

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher or fire hose.

In the event of a chemical spill that is not contained by bunding, Spill Sorb (or similar) must be used to restrict the spread of the chemical.

4.4 MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring all site contractors and other Council staff will be mustered by Council site staff to the Emergency Assembly Point adjacent to the site entrance (identified on Site Plan **01A_EV03**), after which they will be safely evacuated from site where appropriate. It is a condition of entry that in the event of an emergency, both site contractors and staff must adhere to directions given by the Site Supervisor.

4.5 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 4.2**.

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours.

Council would notify neighbours by 'door knocking' every neighbouring property identified on enclosed Site Plan **01B_EV02**. The only exception to this being the neighbouring property of Taronga Western Plains Zoo who would be notified by a telephone call as detailed in **Table 2.1** below. A summary of the neighbour notification procedure is provided in **Document A** – Pollution Incident Decision Flow Chart in **Appendix A**.

Table 2.1 – List of Neighbours to be Notified

Contact Name	Property Address	Contact	Comments
General Enquiries	Taronga Western Plains Zoo Obley Road Dubbo NSW 2830	Tel: 02 6881 1400	Contact by telephone.
n/a	Various residential properties	n/a	Door Knock – see drawing **01B_EV02** for details.

4.6 IDENTIFICATION OF NEIGHBOURS

To assist the EPA in its decision as to whether it needs to direct Council to notify neighbours and to assist Council in visiting all the local neighbours, enclosed is aerial plan **01B_EV02** which identifies the commercial, industrial and residential properties adjacent to the WTP site boundary.

4.7 WTP COUNCIL CONTACT DETAILS

The following Council officers are directly responsible for the overall management of the WTP and, if considered necessary, can be contacted by relevant authorities in the event of a pollution incident:

- Bec Eade, Manager Water Supply & Sewerage 0418 121 512
- Prakashbabu Radhakrishnan, Treatment Operations Coordinator-West 0400 435 542
- Paul Meredith, Water & Sewer Coordinator – West 0419 217 887
- The Duty Plant Operator 0419 141 130

Implementation

5.1 STATUS OF THE PIRMP

The PIRMP and this Supporting Statement are standalone documents designed to assist personnel at the WTP to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident. It complements and should be read in conjunction with *Emergency Response Plan for the John Gilbert Water Treatment Plan Chlorination System, November 2010.*

5.2 STAFF TRAINING

New members of staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner. In particular:

- Staff must be capable of using the fire-fighting equipment;
- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.

Staff competency will be monitored through audits, public complaints and pollution incident reports.

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to familiarise site personnel with the requirements of this management plan. A register of staff training can be found in **Appendix A** and must be kept on site and updated regularly.

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

5.3 REVIEW AND UPDATE PIRMP

The PIRMP is a living document required to be reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version is replaced in its entirety. A register for updating and testing the PIRMP can be found in **Appendix A** and must be kept on site and updated regularly.

Six copies of any new PIRMP will need to be produced. They are to be distributed to the following:

- Water Operations Engineer, Dubbo Regional Council;
- Water Treatment Operations Coordinator - West, Dubbo Regional Council;
- The Duty Plant Operator, Dubbo Regional Council;
- Manager Water Supply & Sewerage, Dubbo Regional Council;
- Director Infrastructure & Operations, Dubbo Regional Council;
- General Manager, Dubbo Regional Council; and

References

Dubbo Local Environmental Plan 2011, November 2011 - prepared by Dubbo Regional Council

Environmental Guidelines: Preparation of Pollution Incident Response Management Plans, March 2012 – prepared by Environment Protection Agency

Environment Protection Licence 11694, 28 January 2011 – prepared by Environment Protection Agency

Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System – Revised, 19 November 2010 – prepared by Dubbo Regional Council

Drawings

Appendix A

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Information and Testing Session of

Pollution Incident Response Management Plan

Of John Gilbert Water Treatment Plant.
On 14 June 2023.

Purpose:	To Familiarise staff with the PIRMP procedure and to test the process.
Overview:	Discussed the PIRMP and the procedures to follow in the event of a pollution incident with all staff present. The notification speed of the incident were discussed, as per PIRMP and Management Staff on site will make sure of SAFETY FIRST and that will include stopping the overflow. Once that is done, notify the EPA of incident and the clean-up procedure /plan. Follow procedure of notifications as outlined in PIRMP. Make sure to complete relevant documents and submit to management for EPA report.
Desk Top Testing - Scenario:	A truck delivery of Ferric Chloride arrives and while unloading a major spill occurs.

Staff's Response on Scenario:

1) If a person is injured call 000 and request emergency responders on site – Hazmat and Ambulance See to injured person without endangering yourself.

2) Open the front access gate and keep open – override switch or place rag on sensor to keep open for emergency services.

3) Request truck driver to stay at the emergency evacuation point – A safe distance away from the spill/leak.

4) Contain spill/leak area by:

- Sandbagging any gutters or storm drains within the spill area.
- Erect barriers in lane ways and roadways that may intersect with the spill area.
- Use spill kit – all staff knew the location of the kit.
- Keep a safe distance.

5) Once emergency services arrive ensure that firefighters are aware of Red Tube at front gate. The tube will include the following documents:

- Layout map of site including drainage diagram
- List of chemicals onsite
- Safety Data Sheets
- Contact list with phone number
- Power Supply Points and isolations

6) Council staff are to offer assistance to Emergency Services and do as directed – otherwise stay out of their way and gather at the emergency evacuation point.

7) Report to Dubbo Regional Council's chain of command as outlined within the PIRMP.

- Operator to notify Supervisor
- Supervisor to notify Treatment Specialist/Engineer and Manager Water Supply and Sewerage.

8) Supervisor to record the following:

- Time
- Date
- Weather conditions
- Nature of Incident
- Estimate Quantity of spill / leak

9) Supervisor to notify the below parties:

- EPA (Mandatory)
- Work Cover (If required)
- Neighbours (If required)

10) Supervisor to record EPA incident numbers and complete PIRMP form.
Once completed form, supervisor is then to send to Operations Engineer/Specialist Treatment and Technical Officer Operations

11) Operations Engineer/Specialist Treatment to sign and forward to EPA.

12) When site is rendered safe normal operations may recommence.

Comments and observations

JGWTP operators explained in detail how they would make the area safe until Emergency Services arrived onsite

Participants were familiar with the PIRMP in order to respond to the pollution incident scenario presented. The discussion exercise was successful in testing the PIRMP. Participants discussed and confirmed their roles in relation to the scenario and pollution incident response.

Attendee list attached separately.

Actions:

- Audit current spill kits and their contents.
- Review the drainage diagram of the John Gilbert Water Treatment Plant.
- Update red tube documents and review regularly.
- Liaise with emergency services (Risk and Insurance Team at DRC) to determine who is in control of the site when emergency services are present.
- Update relevant SOPs/SWMS to include PIRMP in procedure

ATTENDANCE LIST

Training/Testing:	Pollution Incident Response Management Plan - 2023
Date:	14 June 2023
Venue:	Dubbo Water Treatment Plant
Time:	8:00AM
Provider:	DRC

Name	Position	Signature
Prakashbabu Radhakrishnan	Water Treatment Coordinator - West	
~~Jay Lamb~~	~~Treatment Team Leader~~	
Malcolm George	Treatment Technician	
Will Anderson	Water and Waste Water Treatment Assistant	