

**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN**
DUBBO SEWAGE TREATMENT PLANT AND
RETICULATION SYSTEM

PREPARED FOR:

DUBBO REGIONAL COUNCIL

JUNE 2024

Report Title:	<i>Pollution Incident Response Management Plan</i>
Project:	<i>Dubbo Sewage Treatment and Reticulation Systems</i>
Client:	<i>Dubbo Regional Council</i>
Report Ref.:	<i>PIRMP Dubbo</i>
Status:	<i>Final</i>
Issued:	<i>8 June 2022</i>

Change History

Date	Details of Changes	Version
18/06/2024	Contact Details and Information Testing Session Updated	2.1
08/06/2022	Document Reviewed and formatting updated	2.0
16/06/2021	Document Reviewed	1.8
20/05/2020	Document Reviewed	1.7
07/05/2019	Document Reviewed	1.6
12/02/2019	Document Reviewed – Contact Details Updated	1.5
06/02/2018	Document updated to address EPA audit findings	1.4
07/12/2017	Maps Added to Document	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

TABLE OF CONTENTS

1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS	3
2.0 DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART	5
3.0 DOCUMENT B – POLLUTION INCIDENT EMERGENCY CONTACT DETAILS	6
3.1 DEFINITION OF POLLUTION INCIDENT	6
3.2 NOTIFICATION OF POLLUTION INCIDENT	6
3.2.1 NOTIFICATION SPEED OF RESPONSE	6
3.2.2 NOTIFICATION OF RELEVANT AUTHORITIES.....	6
3.2.3 INFORMATION TO BE NOTIFIED.....	7
3.2.4 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS	7
3.2.5 DUBBO REGIONAL COUNCIL CONTACT DETAILS	8
4.0 POLLUTION INCIDENT REPORTING FORM.....	9
5.0 PIRMP TESTING REGISTER.....	11
6.0 STAFF TRAINING REGISTER.....	12
TABLES	
Table 1.1 Pollution Incident Classification, Risk Assessment and Contributing Factors	3
Table 2.3.1 – List of Neighbours to be Notified	8

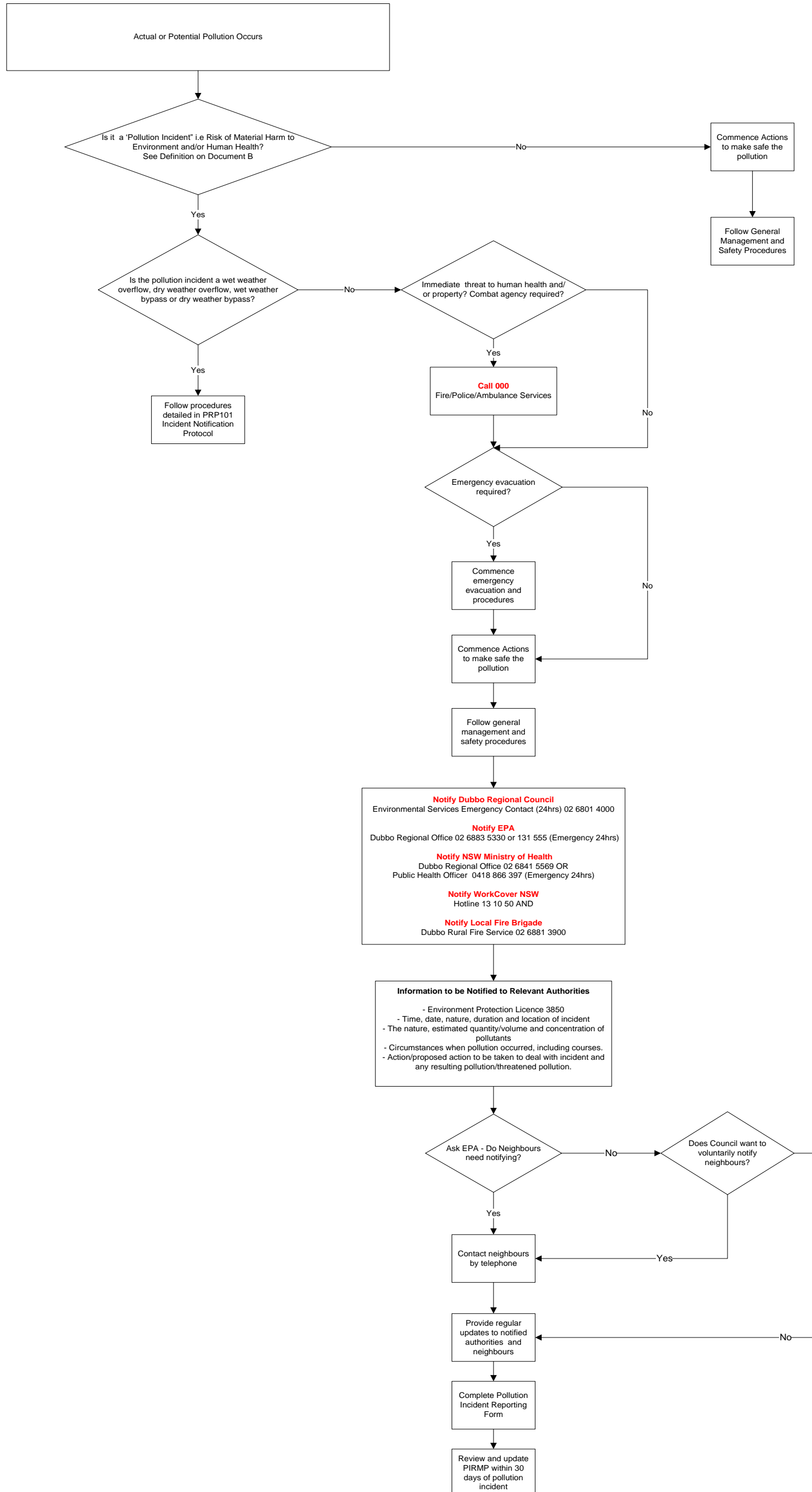
1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table 1.1 Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Wet Weather Overflow from the reticulation system discharges untreated sewage to the environment.	High	Medium	Proximity to sensitive environments, lack of preventative maintenance of the reticulation system, choke or blockage (caused by tree roots, debris, fat etc), failure of mechanical or electrical assets, significant rainfall event, extent of infiltration throughout system.
Dry Weather Overflow from the reticulation system discharges untreated sewage to the environment.	Low	Medium	Proximity to sensitive environments, lack of preventative maintenance of the reticulation system, choke or blockage (caused by tree roots, debris, fat etc), failure of mechanical or electrical assets.
Wet Weather Bypass at the sewage treatment plant (STP) discharges untreated sewage to the Macquarie River during wet weather.	Low	High	Prolonged periods of heavy rain, lack of pond and site maintenance and/or a mechanical failure of plant and equipment.
Dry Weather Bypass at the STP discharges untreated sewage to the Macquarie River during dry weather.	Low	High	Lack of pond and site maintenance and/or a mechanical failure of plant and equipment.
Pond / lagoon failure at the STP discharges treated effluent to the environment.	Low	Medium	Prolonged periods of heavy rain, lack of pond and site maintenance and/or a mechanical failure of plant and equipment.
Mechanical failure at the STP discharges untreated sewage to the environment.	Low	High	Fire damage or poor maintenance of plant and equipment. Prolonged periods of heavy rain.
Mechanical failure at the STP emits offensive odour from the premises.	Low	Low	Fire damage or poor maintenance of plant and equipment.
Rupture of bulk chemical storage tanks spills of corrosive water treatment chemicals to the environment.	Low	Medium	Failure of equipment during re-filling of bulk tankers. Movement of mobile plant around site impacting bund and/or chemical storage tanks. Inadequate inspection and maintenance of chemical storage facility.
Rupture of bulk chemical storage tanks exposes Sewer personnel to corrosive chemicals.	Low	Medium	Failure of equipment during re-filling of bulk tankers. Movement of mobile plant around site impacting bund and/or chemical storage tanks. Inadequate inspection and maintenance of chemical storage facility. Untrained personnel responding to chemical spill. Inadequate maintenance of spill response and PPE.
Damage to property at the STP through acts of vandalism or terrorist activity.	Low	Medium	Increased risk during hours of closure and increased fire risk during sustained periods of hot and dry weather.
Discharge pipeline breakage releases treated effluent to the environment.	Low	Low	Poor maintenance of plant and equipment. Flows exceeding pipe and pump capacity
EPL discharge limits to the Macquarie River are exceeded.	Low	Low	Prolonged periods of heavy rain and mechanical failure of plant and equipment

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Poor management of irrigation in utilisation areas causes significant adverse impact to the environment.	Low	Low	Human error allowing the effluent to be discharged onto utilisation areas during inappropriate times when the land and farm animals are more susceptible to harm. Lack of control and/or monitoring. Prolonged periods of heavy rain.

2.0 DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART



3.0 DOCUMENT B – POLLUTION INCIDENT EMERGENCY CONTACT DETAILS

3.1 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, 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.”*

3.2 NOTIFICATION OF POLLUTION INCIDENT

3.2.1 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.

3.2.2 Notification of Relevant Authorities

If the pollution incident is a wet weather overflow, dry weather overflow, wet weather bypass or dry weather bypass procedures need to be followed in Council’s *PRP 101 Incident Notification Protocol, August 2012*.

In all other pollution incident cases and 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:

Notification of Relevant Authorities

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 5333
- Emergency Hotline Number (24 hours) 131 555

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

- Dubbo Regional Office 02 6809 8963
02 6809 8979
- 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 6881 3900**

**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.

3.2.3 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.

3.2.4 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 3.2.2**.

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 making a telephone call to every neighbouring property of the STP as detailed in **Table 2.1** below. A summary of the neighbour notification procedure is provided in **Document A – Pollution Incident Decision Flow Chart**.

Table 2.3.1 – List of Neighbours to be Notified

Contact Name	Property Address	Contact	Comments
T. Sommerville	32L Boothenba Road Dubbo NSW 2830	Tel: 0429 964 593	Contact by telephone.
T. Blackburn	33L Boothenba Road Dubbo NSW 2830	n/a	Door Knock
Western Memorial Park	11L Boothenba Road Dubbo NSW 2830	Tel: 02 6885 3340	Contact by telephone
R. Holmes Transport	7L Boothenba Road Dubbo NSW 2830	Tele: 02 6884 4866	Contact by telephone
DRC Sale Yards	4R Boothenba Road Dubbo NSW 2830	Tele: 0417 272 844	Contact by telephone
Neil's Parts	14R Boothenba Road Dubbo NSW 2830	Tele: 02 6882 9699	Contact by telephone
DRC Animal Shelter	189 Boothenba Road Dubbo NSW 2830	Tele: 02 6882 1934	Contact by telephone
Fletchers International	34L Yarrandale Road Dubbo NSW 2830	Tel: 02 6884 5833	Contact by telephone
Fardell Investments	5L Old Gilgandra Road Dubbo NSW 2830	Tel: 0429 844 433	Contact by telephone
Bungaribee Homestead	30L Boothenba Road Dubbo NSW 2830	N/A	Door Knock

3.2.5 Dubbo Regional Council Contact Details

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

- Bec Eade, Manager Operations Water Supply & Sewerage 0418 121 512
- Ashley Quinn, Water and Sewer Technical Officer – Operations 0474 909 115
- Mark Gilbert, Waste Water Treatment Coordinator – West 0436 194 902
- Dubbo STP On – Call Technician 02 6801 4888
- Hendrik Gouws, Water Operations Specialist Reticulation 0436 608 918
- Jason Naveau, Reticulation Coordinator – West 0428 401 151

4.0 POLLUTION INCIDENT REPORTING FORM

INCIDENT No:	TIME:
--------------	-------

DATE:	DURATION OF INCIDENT:
-------	-----------------------

NATURE OF INCIDENT:

WEATHER CONDITIONS:

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 CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION (IF KNOWN):

HAS COUNCIL BEEN NOTIFIED?	YES	NO
HAS ENVIRONMENT PROTECTION AUTHORITY (EPA) BEEN NOTIFIED?	YES	NO
HAS NSW MINISTRY OF HEALTH (VIA PUBLIC HEALTH UNITS) BEEN NOTIFIED?	YES	NO
HAS WORKCOVER NSW BEEN NOTIFIED?	YES	NO
HAS LOCAL FIRE AND RESCUE NSW BEEN NOTIFIED?	YES	NO

HAS EPA DIRECTED COUNCIL TO NOTIFY NEIGHBOURS?	YES	NO
IF NOT, HAS COUNCIL VOLUNTARILY NOTIFIED NEIGHBOURS?	YES	NO

Signature:	Date:
Site Supervisor, Dubbo Regional Council	
Signature:	Date:
Manager Water supply and Sewerage, Dubbo Regional Council	

5.0 PIRMP TESTING REGISTER

Date	Testing Method (Drill / Desktop)	Participants

Pollution Incident Response Management Plan

Of Dubbo Sewer Treatment Plant.

On 18 June 2024.



Purpose:	To Familiarise staff with the PIRMP procedure and to test the process.
Overview:	<p>Discussed the PIRMP and the procedures to follow in the event of a pollution incident with all staff present.</p> <p>The notification speed of the incident were discussed, as per PIRMP and Management Staff on site will make sure of SAFTY FIRST and that include to stop the overflow. Once that is done, notify the EPA of incident and the clean-up procedure /plan.</p> <p>Follow procedure of notifications as outlined in PIRMP. Make sure to complete relevant documents and submit to the Technical Officer and manager for EPA report.</p>
Desk Top Testing - Scenario:	<p>A Treatment Technician is supervising the refill.</p> <p>While refilling the Sodium Hydroxide bulk storage tank at the STP the driver has accidentally spilt the chemical (roughly 3000L) inside the bund and onto the adjoining road next to the truck.</p>

Staff's Response on Scenario:

- 1) Tell truck driver to stop and once stopped turn off the feeder valve. If he is covered in the chemical use safety shower and/or eyewash.
- 2) Tell truck driver to leave the scene and wait at the main office.
- 3) Don PPE (including respirator gear) and take photos of the spill.
- 4) Make sure any drains/waterways are covered to prevent chemical entering waterways outside the bund.
- 5) Dilute Sodium Hydroxide with reuse water on road. Bund is handled and will drain on its own in a controlled environment.
 - o Use fire extinguisher if chemical reacts with metal and combusts. If it does combust, follow emergency evac plan and contact 000.
- 6) Clean up of the spill on the road as best you can.
- 7) Take photos of after the clean-up.
- 8) Notify Site Supervisor (if unaware of the situation thus far).
- 9) Site supervisor to inspect the area to ensure no further spill or issues have occurred.
- 10) Site supervisor to deem the site as 'safe'.
- 11) Send Truck driver back down to collect the truck.
- 12) EPA to be notified and an EPA incident report form is completed and sent to Water and Sewer Treatment Engineer.
- 13) Complete and send Council incident report to Water and Sewer Treatment Engineer and Chemical company.

Information and Testing Session of

Pollution Incident Response Management Plan

Of Dubbo Sewer Treatment Plant.

On 18 June 2024.



Comments and observations

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.

Casual employees/labourers were well inducted on site procedures and understood the evacuation/safety plans.

Attendee list attached separately.

ATTENDANCE LIST



Training/Testing:	Pollution Incident Response Management Plan - 2024
Date:	18 June 2024
Venue:	Dubbo Sewer Treatment Plant
Time:	1:30 PM
Provider:	DRC

Name	Position	Signature
Mark Gilbert	Waste Water Treatment Coordinator – Operations	
Chris Dooley	Waste Water Treatment Technician	
Nicole Jolliffe	Programmed Skilled Workforce Casual	
Clint Woods	Spinifex Casual	
Warwick Burke	Spinifex Casual	