POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

WELLINGTON SEWAGE TREATMENT PLANT AND RETICULATION SYSTEM

PREPARED FOR:

DUBBO REGIONAL COUNCIL

JUNE 2024

Report Title:	Pollution Incident Response Management Plan
Project:	Wellington Sewage Treatment Plant and Reticulation System
Client:	Dubbo Regional Council
Report Ref.:	PIRMP Wellington STP and Reticulation System
Status:	Final
Issued:	8 June 2022

Change History

Date	Details of Changes	Version
26/06/2024	Contact Details and Information Testing Session Undeted	2.4
26/06/2024	Contact Details and Information Testing Session Updated	2.1
08/06/2022	Document Reviewed and Formatting Updated	2.0
16/06/2021	Document Reviewed	1.6
01/06/2020	Document Reviewed – Contact Details Updated	1.5
07/05/2019	Document Reviewed	1.4
12/02/2019	Document Reviewed – Contact Details Updated	1.3
16/03/2018	Document updated to address EPA audit findings	1.2
20/11/2017	Document Reviewed – Dubbo Regional Council	1.1
01/10/2013	Original Document	1.0

TABLE OF CONTENTS

1.0					•		ASSESSMEN	
2.0	DOC	JMENT .	A - POLLUTI	ON INCIDEN	T DECIS	ION FLO	OW CHART	5
3.0	DOC	JMENT	B – POLLUT	ION INCIDEN	IT EMER	GENCY	CONTACT DE	TAILS 6
	3.1 3.2	DEFINIT NOTIFIC	ION OF POLLU ATION OF POL	TION INCIDENT LUTION INCIDE	Г ENT			6
		3.2.1 3.2.2 3.2.3 3.2.4 3.2.5	NOTIFICATION INFORMATION EPA POWERS	N OF RELEVAN N TO BE NOTIFI S OF DIRECTION	T AUTHOF IED N & NOTIF	RITIES ICATION	OF NEIGHBOURS	6 7 S 7
4.0	POLL	.UTION	INCIDENT RI	EPORTING F	ORM			9
5.0	PIRM	P TEST	ING & UPDA	TE REGISTE	R			11
6.0	STAF	F TRAIN	NING REGIST	ΓER				12
TAI	BLES							
							uting Factors	

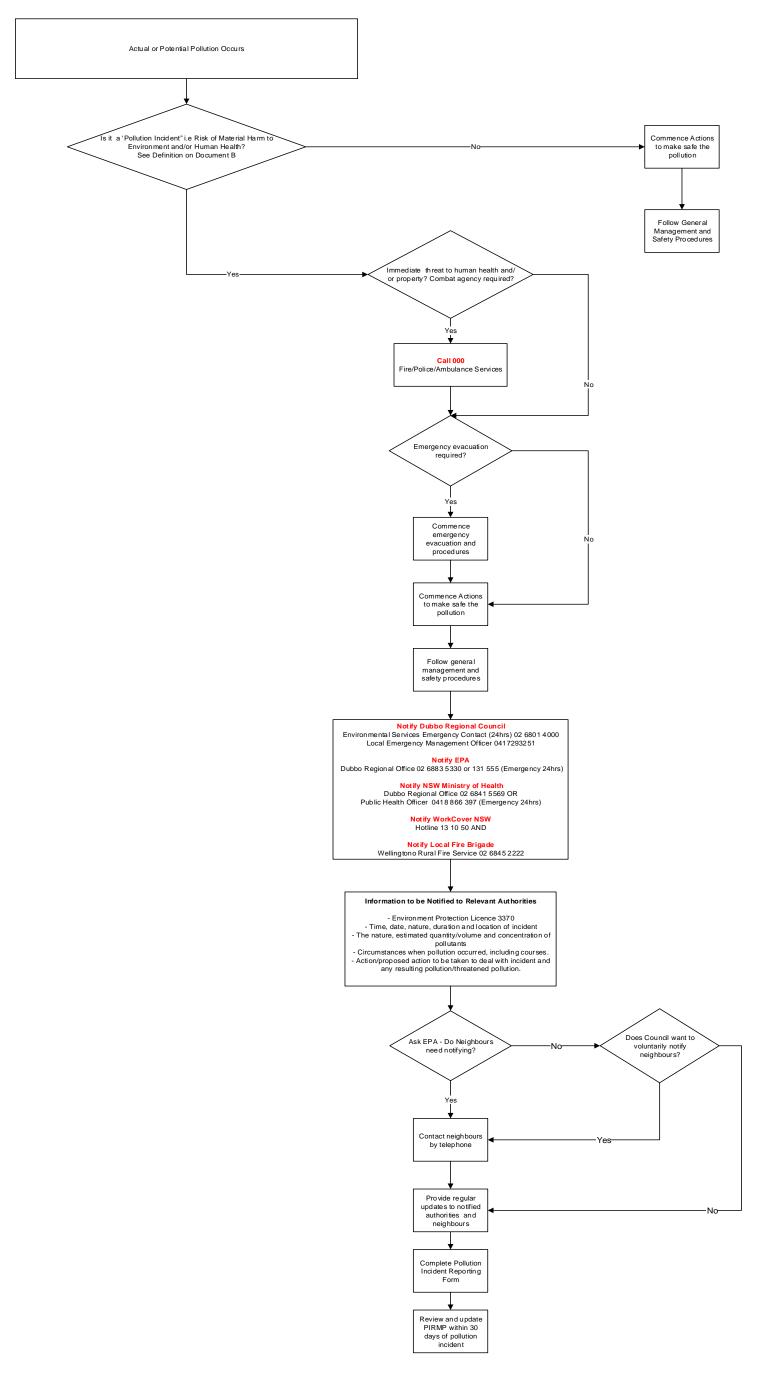
1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table 1.1

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



Version 2.1 | June 2024 Page 5

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

In all 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 5330
•	Emergency Hotline Number (24 hours)	131 555

4. NSW 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

Wellington Rural Fire Service

02 6845 2222**

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.

^{**}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.

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 2.1 - List of Neighbours to be Notified

Contact Name	Property Address	Contact	Comments
Gai and Ian Griffin	"Glenrock" 66 Bushrangers Creek Road	Tel: 02 6845 2161 Tel: 0458 452 611	Contact by telephone
Raymond Kelly	93 Bushrangers Creek Mount Arthur	Tel: 02 6845 1638	Contact by telephone
Judith Wykes	"Cornwall" 122 Bushrangers Creek Road		Door Knock
Tony Inder	30 Brennans Way Mount Arthur	Tel: 0427 745 110	Contact by telephone
Gary McCarney	60 Bushrangers Creek Road	Tel: 02 6845 1899	Contact by telephone

3.2.5 Dubbo Regional Council Contact Details

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

•	Bec Eade, Manager Operations Water Supply and Sewerage	0429 443 657
•	Ashley Quinn, Water and Sewer Technical Officer - Operations	0474 909 115
•	Frank Sciamanna, Treatment Operations Coordinator	0474 893 723
•	Hendirk Gouws, Water Operations Specialist Reticulation	0436 217 918
•	Scott Francis, Water and Sewer Coordinator East	0419 614 723
•	After Hour On Call Technician	02 6840 6468

POLLUTION INCIDENT REPORTING FORM 4.0 **INCIDENT NO:** TIME: DATE: **DURATION OF INCIDENT: N**ATURE OF **I**NCIDENT: 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?

HAS LOCAL FIRE AND RESCUE NSW BEEN NOTIFIED?

YES

YES

No

No

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN WELLINGTON SEWAGE TREATMENT PLANT AND RETICULATION SYSTEM DUBBO REGIONAL COUNCIL

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 and Sewerage Supply, Dubbo Regional Council		

5.0 PIRMP TESTING & UPDATE REGISTER

Date	Routine Testing	Routine Update	Post Incident Updates	7 New Copies Distributed?

6.0 STAFF TRAINING REGISTER

Date	Staff Member	Brief Description of Training Task

Pollution Incident Response Management Plan



Of Wellington Sewer Treatment Plant. On 26 June 2024.

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 SAFTY FIRST and that include to stop the overflow.	
	Once that is done, notify the EPA of incident and the clean-up procedure/plan.	
Desk Top Testing - Scenario:	Alum leak at STP. No contractors on site. During the filling process the delivery driver has spilt 5000L outside of the bunded area.	

Staff's Response on Scenario:

- 1. Isolate outlet valve on tanker where the hose is hooked up.
- 2. Assess the amount spilt.
- 3. Don PPE and assist truck driver in isolating leak.
- 4. Notify the manager and supervisor (chain of command)
- 5. Complete an incident report.
- 6. Notify EPA and complete PIRMP
- 7. Notify NowChem of situation.

Comments and observations

Participant discussed and confirmed his team's roles in relation to the scenario and pollution incident response.

Attendee list attached separately.

ATTENDANCE LIST



Training/Testing:	Pollution Incident Response Management Plan - 2023	
Date: 26 June 2024		
Venue:	Wellington Sewer Treatment Plant	
Time:	11 AM	
Provider:	DRC	

Name	Position	Signature
Frank Sciamanna	Treatment Operations Coordinator	1. Suamare
Scott Stanley	Treatment Operations Team Leader	Annual Leave
Cameron Holmes	Waste Water Treatment Technician	Bereavement Leave
	Waste Water Treatment Technician	