

**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN**
WELLINGTON SEWAGE TREATMENT SYSTEM

PREPARED FOR:
DUBBO REGIONAL COUNCIL

JUNE 2023

Report Title:	<i>Pollution Incident Response Management Plan</i>
Project:	<i>Wellington Sewage Treatment System</i>
Client:	<i>Dubbo Regional Council</i>
Report Ref.:	<i>212120_PIRMP_002_Wellington_STP.docx</i>
Status:	<i>Final</i>
Issued:	<i>29/06/2023</i>

Change History

Date	Details of Changes	Version
29/06/2023	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

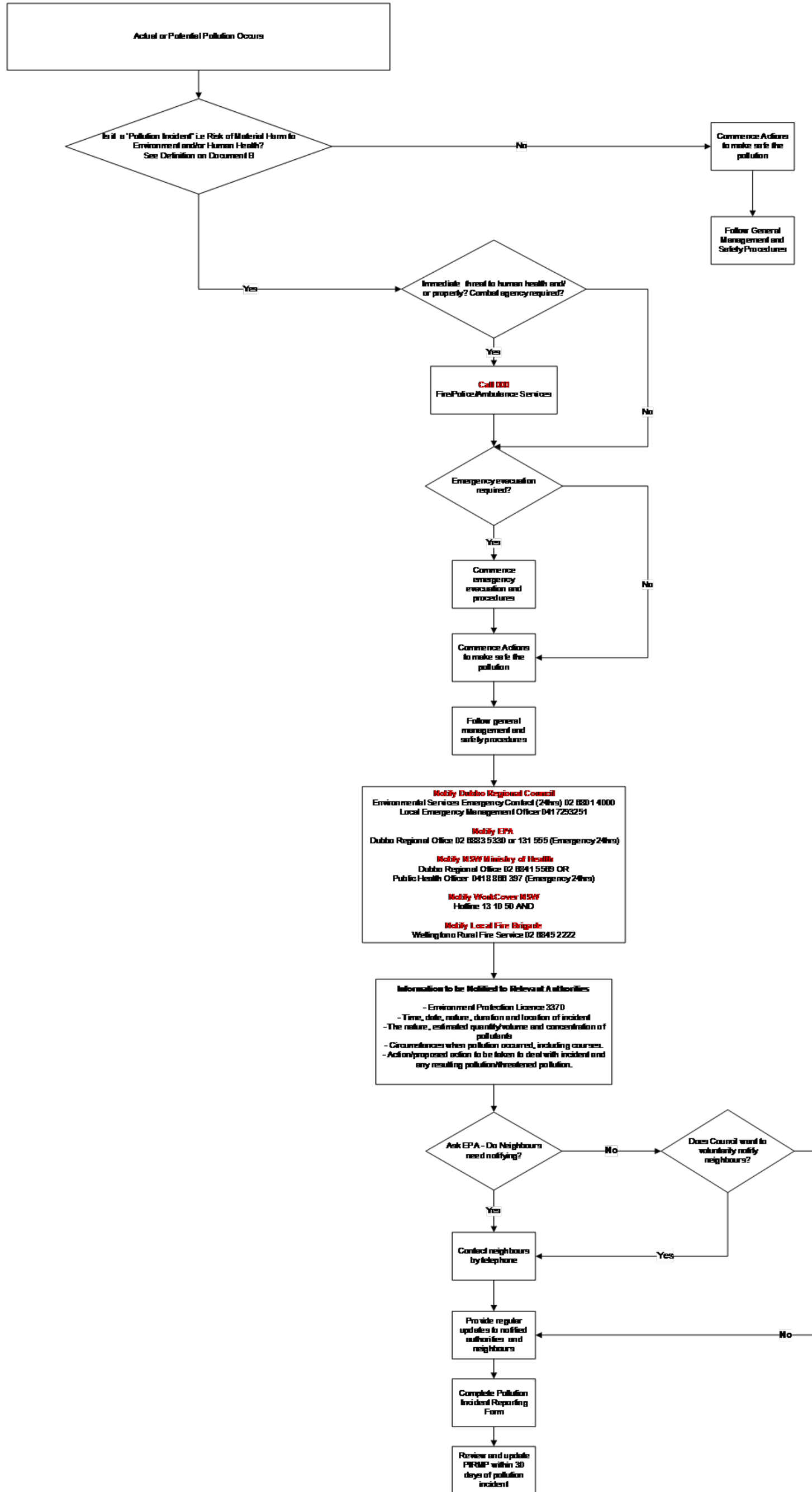
1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS	3
2.0 DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART	4
3.0 DOCUMENT B – POLLUTION INCIDENT EMERGENCY CONTACT DETAILS	5
3.1 DEFINITION OF POLLUTION INCIDENT	5
3.2 NOTIFICATION OF POLLUTION INCIDENT	5
3.2.1 NOTIFICATION SPEED OF RESPONSE	5
3.2.2 NOTIFICATION OF RELEVANT AUTHORITIES	5
3.2.3 INFORMATION TO BE NOTIFIED	6
3.2.4 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS	6
3.2.5 SEWAGE TREATMENT SYSTEM COUNCIL CONTACT DETAILS	7
4.0 POLLUTION INCIDENT REPORTING FORM	8
5.0 PIRMP TESTING & UPDATE REGISTER	10
6.0 STAFF TRAINING REGISTER	11
TABLES	
Table 1.1 – Pollution Incident Classification, Risk Assessment and Contributing Factors	3
Table 2.1 – List of Neighbours to be Notified	7

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 during wet weather.	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 during dry weather.	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.
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.
Mechanical / Electrical failure at the STP results in discharge of untreated sewage.	Low	High	Fire damage or poor maintenance of plant and equipment. Prolonged periods of heavy rain. Power Outages
Mechanical / Electrical failure at the STP results in offensive odour from the premises.	Low	Low	Fire damage or poor maintenance of plant and equipment. Power Outages
Inadequate chemical storage.	Low	Medium	Human error. Chemical fire accelerated by high winds, dry weather, prolonged periods of high temperatures and low humidity.
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
Exceed Environment Protection Licence (EPL) discharge limits to the Macquarie River.	Low	Low	Prolonged periods of heavy rain and mechanical failure of plant and equipment

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

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**

**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 2.1 – 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	
Raymond Kelly	93 Bushrangers Creek Mount Arthur	Tel: 02 6845 1638	
Judith Wykes	"Cornwall" 122 Bushrangers Creek Road		Door Knock
Samuel Maroulis	30 Brennans Way Mount Arthur	Tel: 0428 584 580	Doesn't have a landline
Gary McCarney	60 Bushrangers Creek Road	Tel: 02 6845 1899	

3.2.5 Sewage Treatment System 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 Water Supply and Sewerage 0429 443 657
- Frank Sciamanna , Acting Water and Sewer Coordinator East 0474 893 723
- Scott Francis, Water and Sewer Maintenance Supervisor, 0419 614 723

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:
Water Operations Engineer, 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 29 June 2023.



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.</p> <p>Once that is done, notify the EPA of incident and the clean-up procedure/plan.</p>
Desk Top Testing - Scenario:	After Hour On-Call Technician received a pump failure text and found Palmer SPS is overflowing after a rain fall and (electrical) pump failure.

Staff's Response on Scenario:

- 1) Attend site
- 2) Operators to try and contain spillage, call local waste management services to pump out SPS.
- 3) Operator to notify Supervisor.
- 4) Supervisor to notify EPA.
- 5) Once site is contained operator on site calls a local electrician to investigate fault.
- 6) Supervisor to notify DRC chain of command and complete Pollution Incident Reporting Form and forward to the Technical Officer and Engineer/Specialist to escalate to EPA.
- 7) Once level in tank is low enough, site can be cleaned and disinfected.
- 8) If pump needs replacing, organise with MECH/ELEC or local contractors to replace/repair the infrastructure.
- 9) Update supervisor of situation.

Comments and observations



Participants discussed and confirmed their 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:	29 June 2023
Venue:	Wellington Sewer Treatment Plant
Time:	2:00PM
Provider:	DRC

Name	Position	Signature
Jason Kirk	Treatment Operations Coordinator	
Frank Sciamanna	Treatment Operations Team Leader	
Scott Stanley	Waste Water Treatment Technician	
Cameron Holmes	Waste Water Treatment Technician	