

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**



**WALGETT SEWAGE TREATMENT PLANT (SYSTEM)**

**Bate Street - Walgett**

Revision V5 - 3/7/24

|  |  |  |  |
| --- | --- | --- | --- |
| REVISION | DATE | AUTHOR / REVIEWER | DETAILS |
| DRAFT 1 | 10/09/13 | LOGICUS Environmental Management | Provided to WSC for comment |
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| REV 1 | 25/08/14 | Acting Director Urban Services | Updated contact list |
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| REV 5 | 3/7/24 | Walgett Shire Council | WSC comments:  page 12 - descriptor has moved on plan  page 22 - needs reference to gas corrosion of infrastructure especially concrete  page 29 - change sewerage to sewage  page 45 - should be sewage  page 57 - should be sewage  page 69 to 71- exercise should refer to STP only. |
| REV 5 | 3/7/24 | John Cavanagh Consulting | Pages 12, 29,45,57 amended |
|  |  |  |  |

# REVISION HISTORY

# CONTENTS

[REVISION HISTORY 2](#_Toc170462705)

[CONTENTS 3](#_Toc170462706)

[1. ADMINISTRATION 5](#_Toc170462707)

[1.1 Purpose 5](#_Toc170462708)

[1.2 Objective & Scope 5](#_Toc170462709)

[1.3 Legislative Context 6](#_Toc170462710)

[1.4 Key Terms & Meanings 6](#_Toc170462711)

[1.4.1 Pollution Incident 6](#_Toc170462712)

[1.4.2 Material Harm to the Environment 6](#_Toc170462713)

[1.4.3 Immediate Reporting Requirement 7](#_Toc170462714)

[1.5 Facility covered by this PIRM PLAN 7](#_Toc170462715)

[1.6 PIRM PLAN Distribution 7](#_Toc170462716)

[1.7 PIRM PLAN Review 7](#_Toc170462717)

[1.8 PIRM PLAN Training 8](#_Toc170462718)

[1.8.1 Training Frequency 8](#_Toc170462719)

[1.8.2 Training Level 8](#_Toc170462720)

[1.8.3 Supervisor Training 8](#_Toc170462721)

[1.8.4 Training Competencies 8](#_Toc170462722)

[1.9 Form of PIRM PLAN 9](#_Toc170462723)

[1.10 Relationship With Other Emergency & Incident Response Plans 9](#_Toc170462724)

[Figure 1 - Location Map: 10](#_Toc170462725)

[2. FACILITY DETAILS 10](#_Toc170462726)

[2.2 Facility Description 12](#_Toc170462727)

[2.2.1 Site Activities 12](#_Toc170462728)

[2.2.2 Site Plan 13](#_Toc170462729)

[3.1 Prevention as an Incident Response 14](#_Toc170462730)

[3. POLLUTION INCIDENT PREVENTION & PREPAREDNESS 14](#_Toc170462731)

[3.2 Register of Potential Pollutants 15](#_Toc170462732)

[3.3 Nature and Likelihood of Pollution Incidents 16](#_Toc170462733)

[3.3.1 Likelihood 16](#_Toc170462734)

[3.3.2 Consequence 17](#_Toc170462735)

[3.3.3 Risk Evaluation 17](#_Toc170462736)

[Figure 3 - Risk Evaluation Matrix: 17](#_Toc170462737)

[3.4 Incident Preparedness 24](#_Toc170462738)

[3.4.1 Response Equipment and Features 24](#_Toc170462739)

[Table 6 - Response Equipment Inventory 24](#_Toc170462740)

[3.4.2 Communication System 25](#_Toc170462741)

[3.4.3 Security 25](#_Toc170462742)

[3.4.4 First Aid Equipment 25](#_Toc170462743)

[3.4.5 Signs & Labels 25](#_Toc170462744)

[3.4.6 Funding Arrangements and Support 25](#_Toc170462745)

[4. POLLUTION INCIDENT CONTROL & RESPONSE 26](#_Toc170462746)

[4.1 Key Facility Incident Management Contact Details 26](#_Toc170462747)

[4.2 Key Incident Contact Details 27](#_Toc170462748)

[4.3 Incident Notification and Communication 28](#_Toc170462749)

[4.3.1 Incident Notification 28](#_Toc170462750)

[4.3.2 Community Notification and Communication 29](#_Toc170462751)

[4.4 FACILITY EVACUATION 34](#_Toc170462752)

[4.4.1 General Requirements 34](#_Toc170462753)

[4.4.2 Stages of Evacuation 34](#_Toc170462754)

[4.4.3 Mobility Impaired Persons 35](#_Toc170462755)

[4.4.4 Evacuation Assembly Areas 35](#_Toc170462756)

[4.4.5 Post Evacuation Assembly Point 36](#_Toc170462757)

[5. POLLUTION INCIDENT RESPONSE PROCEDURES 37](#_Toc170462758)

[6. POST POLLUTION INCIDENT ACTIVITIES 37](#_Toc170462759)

[6.1 Recovery Operations 37](#_Toc170462760)

[6.2 Incident Investigation (After Action Review) 38](#_Toc170462761)

[6.2.1 Small Incidents 38](#_Toc170462762)

[6.2.2 Major Incidents 38](#_Toc170462763)

[6.3 Documentation 38](#_Toc170462764)

[6.4 Incident Impact Assessment 39](#_Toc170462765)

[6.5 Incident Debriefing 39](#_Toc170462766)

[6.6 After Action Review & PIRM PLAN Update / Amendment 39](#_Toc170462767)

[END 39](#_Toc170462768)

[APPENDIX 1: PIRM PLAN AMENDMENT NOTIFICATION FORM 40](#_Toc170462769)

[APPENDIX 2: STAFF & CONTRACTOR TRAINING 41](#_Toc170462770)

[APPENDIX 3: PIRM PLAN EXERCISE RECORD & EVALUATION FORM 44](#_Toc170462771)

[APPENDIX 4: POLLUTION INCIDENT REPORTING & RECORDING 45](#_Toc170462772)

[APPENDIX 5: POLLUTION INCIDENT NOTIFICATION PROTOCOL 49](#_Toc170462773)

[APPENDIX 6: EFFLUENT POND / TANK / CONTAINMENT RUPTURE RESPONSE 50](#_Toc170462774)

[APPENDIX 7: ENVIRONMENTAL MONITORING 51](#_Toc170462775)

[APPENDIX 8: CHEMICAL SPILL RESPONSE 52](#_Toc170462776)

[APPENDIX 9: STORAGE & HANDLING OF CHEMICAL / HAZARDOUS SUBSTANCES 53](#_Toc170462777)

[APPENDIX 10: FUEL / OIL SPILLS RESPONSE 55](#_Toc170462778)

[APPENDIX 11: FIRE WITHIN THE SEWERAGE TREATMENT PLANT 57](#_Toc170462779)

[APPENDIX 12: FACILITY EVACUATION 58](#_Toc170462780)

[APPENDIX 13: COMMUNICATIONS RECIPIENTS SCHEDULE (NEIGHBOURS) 60](#_Toc170462781)

[APPENDIX 14: OPERATIONAL CHECKLISTS 61](#_Toc170462782)

[APPENDIX 15: SITE SERVICES & INFRASTRUCTURE PLAN 66](#_Toc170462783)

[APPENDIX 16: PIRM PLAN TRAINING AGENDA 67](#_Toc170462784)

[APPENDIX 17: PIRM PLAN TRAINING ATTENDEE LIST 68](#_Toc170462785)

[APPENDIX 18: PIRM PLAN TRAINING SIMULATION EXERCISES 69](#_Toc170462786)

## 1.1 Purpose

# 1. ADMINISTRATION

This Pollution Incident Response Management Plan (PIRM PLAN) has been prepared to comply with the obligations introduced in the *Protection of the Environment Operations Act 1997* (POEO Act) which requires the preparation and implementation of a PIRM PLAN.

The purpose of this PIRM PLAN is to assist employees and management of the Walgett Sewage Treatment Plant and associated infrastructure / operations, to identify the potential risk of a pollution incident occurring, introduce measures to mitigate that risk AND to give direction in making quality decisions should a pollution incident occur. This PIRM PLAN contains guidance in determining the appropriate pre-emptive actions needed to 'prevent material harm' to the environment.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local Council.

## **1.2 Objective & Scope**

It is Walgett Shire Council's (WSC) intent to prevent all foreseeable pollution incidents that might impact on the environment and the safety of employees, visitors & neighbours, through the implementation of standard operational procedures, undertaking routine site activity inspections, regular training of personnel in the implementation of operational procedures and through emphasising and supporting proactive incident prevention reporting.

However, it is recognised that pollution incidents are not totally preventable. Therefore this PIRM PLAN has been developed to achieve the following objectives:

* reduce the likelihood of a pollution incident occurring at the facility through identification of risks and the development of planned actions to minimize and manage those risks.
* ensure comprehensive and timely communication about a pollution incident to all staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as NSW Ministry of Health, WorkCover NSW, and Fire & Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
* ensure that the PIRM PLAN is properly implemented by trained staff, identifying persons responsible for implementation and ensuring that the PIRM PLAN is regularly tested for accuracy, currency and suitability.
* provide guidance on how to respond to an environmental pollution incident and how to record and report such an event.

This PIRM PLAN contains guidance in determining the appropriate actions to take to prevent a pollution incident, injury or property damage and how to respond should a pollution incident occur. The PIRM PLAN also includes provisions for record keeping, testing, reporting and document revision.

## **1.3 Legislative Context**

The specific requirements for PIRM PLANs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2022 (clause 72). In summary, this provision requires the following:

* All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
* The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO Regulation (clause 71).
* Licensees must keep the Plan at the premises to which the Environment Protection Licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act & clause 74 of the Regulation).
* Licensees must test the plan in accordance with the POEO Regulation (clause 75).
* If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan (section 153F, POEO Act).

## **1.4 Key Terms & Meanings**

An understanding and appreciation of the following key terms is considered integral to the successful implementation of this PIRM PLAN.

1. Pollution Incident

The definition of a pollution incident as defined in the POEO Act dictionary is:

'An incident or set of circumstances, during or as a consequence of, which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise'.

1. Material Harm to the Environment

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 as:

'(a) harm to the environment is material if:

1. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
2. 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. Immediate Reporting Requirement

Industry is now required to report pollution incidents 'immediately' to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local Council (WSC). 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

## **1.5 Facility covered by this PIRM PLAN**

This PIRM PLAN incorporates activities of Environment Protection Licence (EPL) L13056, which references the 'Walgett Sewage Treatment System' which collectively includes the 'reticulation network' (structures that collect / direct sewage) AND the treatment plant itself.

## **1.6 PIRM PLAN Distribution**

The master copy of this PIRM PLAN is to be maintained by the Director Engineering (WSC) who will be responsible for revisions of the PIRM PLAN and for the distribution of revised copies to the above mentioned persons and location.

A copy of this PIRM PLAN is required to be kept at the premises to which the relevant Environmental Protection Licence (EPL) relates, or where the relevant activity takes place, so that it is readily available to those responsible for its implementation and to any Authorised Officer upon request.

A copy of this PIRM PLAN is also to be retained by the Director Engineering (WSC).

## 1.7 PIRM PLAN R**eview**

The PIRM PLAN is to be reviewed annually by the Director Engineering (WSC) in conjunction with relevant Council staff including the STP Operator in Charge (WSC).

When revisions are made to the PIRM PLAN, the revised document will be re-distributed and redundant copies collected and discarded. The date of issue and revision number is to be recorded on the title page of the document for future reference.

As part of the revision process, a Notification of Change Form, (Appendix 1), will be provided which must be signed by each responsible party indicating that the party has received a copy of the changes and that the copy of the PIRM PLAN assigned to that party has been updated. This form is to then be retained on file by the Director Engineering (WSC).

## 1.8 PIRM PLAN Training

To ensure that this PIRM PLAN is properly followed in the event of a pollution incident, training programs shall be provided to relevant Council Employees. The objectives of the training program shall be as follows:

1. To ensure that *Council Employees* are knowledgeable of their roles and responsibilities concerning this PIRM PLAN.
2. To ensure that *Council Employees* are knowledgeable of the PIRM PLAN's procedures to effect a safe and appropriate response to pollution incidents.

Council Employees will receive training in the PIRM PLAN appropriate to the level of their expected involvement. The following is the general training program which is to be implemented in support of this PIRM PLAN:

* + 1. Training Frequency

Council Employees working at the facility will receive training during initial employment orientation / induction and refresher training at least annually.

Additional training will also be provided to employees whenever the PIRM PLAN is changed.

* + 1. Training Level

All Council Employees working at the facility will receive training in the general PIRM PLAN procedures and Standard Operating Procedures related to the PIRM PLAN.

Training shall cover routine pre-emptive inspections, incident discovery and management, (standard operating procedures), notifications, incident response and best practice facility management.

* + 1. Supervisor Training

The Director Engineering (WSC) will receive additional training, beyond that received by Council employees or other site personnel, dealing with actions that are necessary to provide for the safety of employees, contractors, possible site visitors, the protection of facility assets and the management of pollution incidents generally.

* + 1. Training Competencies

Details of the training competencies achieved by Council Employees, relevant to this PIRM PLAN, are provided in **Appendix 2**.

*1.8.5 PIRM PLAN Drills & Exercises*

To ensure that this PIRM PLAN will meet current conditions and that all involved individuals will respond appropriately, the PIRM PLAN will be tested on an annual basis. The testing will include at least the following:

1. Reaction and accountability of facility personnel; and
2. Adherence to PIRM PLAN procedures.

All drills and exercises of the PIRM PLAN will be documented, indicating the results of the exercise and any problems that were encountered, along with recommendations for PIRM PLAN modifications.

The Director Engineering (WSC) will complete a Pollution Incident Exercise Evaluation Form (Appendix 3) and maintain copies for review.

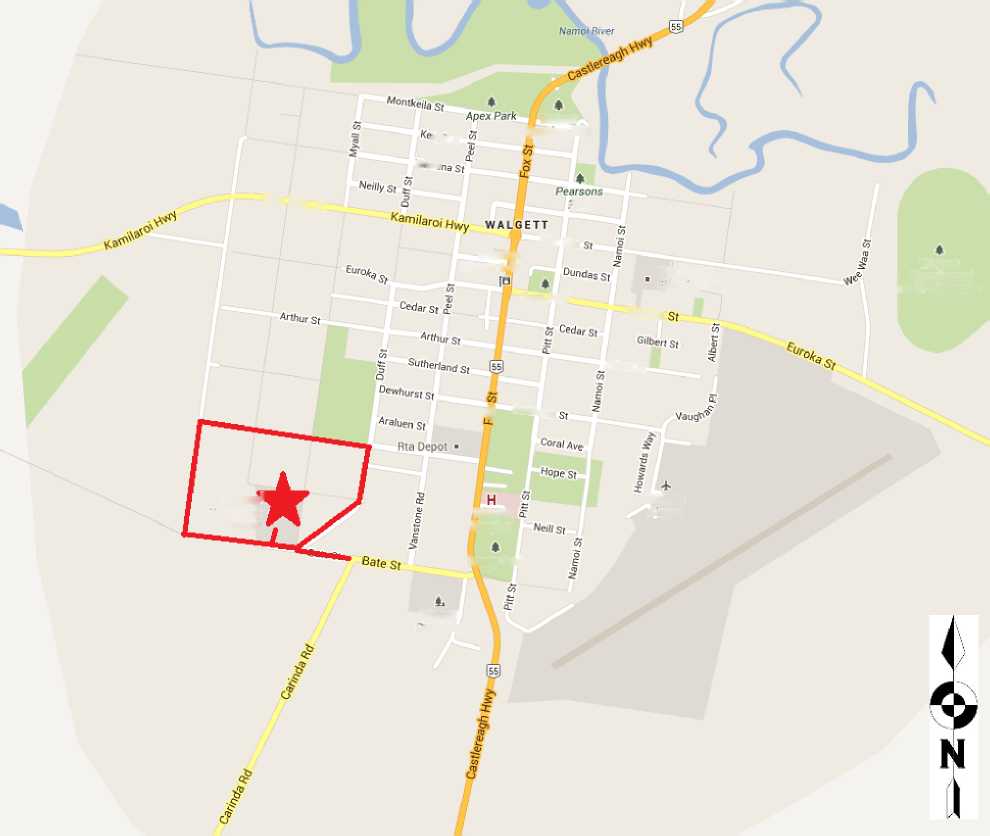
## 1.9 F**orm of** PIRM PLAN

As the purpose of this PIRM PLAN is to mitigate the likelihood and to improve the management of pollution incidents and facilitate better coordination with the relevant response agencies and community, this PIRM PLAN must be provided in written form, be available at the subject premises, be able to be provided to an authorised EPA officer on request and available to any person who is responsible for implementing the PIRM PLAN.

## **1.10 Relationship With Other Emergency & Incident Response Plans**

This PIRM PLAN can function as a standalone document, the implementation of which is required to be undertaken to mitigate risk of a pollution incident but also to respond to a likely pollution incident where there is a potential of 'material harm to the environment'.

If other plans, procedures and protocols provide for enhanced, ancillary or complementary actions, then they may and should be implemented concurrently.

**2**.**1 Location**

NAME OF THE FACILITY: WALGETT SEWAGE TREATMENT SYSTEM (STP)

ADDRESS: BATE STREET, WALGETT, NSW 2832

PROPERTY DESCRIPTION: LOT 1 DP 34135

OWNER: WALGETT SHIRE COUNCIL

***Figure 1 - Location Map:***

*Walgett Sporting Club*

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• 'art

# 2. FACILITY DETAILS

Clemson Hiscox & Co

Wsc Depot

*Walgett*

f iltration Plant

*Showground*

and *Racecourse*

*Gray Park*

*tiircka*

*Arthur St*

g D«'"iurs,

Sewage\*

Treatment

Works

Walgett

Walgett

Hospital

Airport

*Rotary Park*

Walgett cemetery

SITE ACCESS: The 'site' is considered to be the STP which is accessed by travelling west along

Bate Street, (south west of Walgett), then via the MAIN ACCESS road (right turn) which leads to the Locked Access Gate at the STP

The STP and site entrance is shown as the 'Main Access' on Figure 2(a) - General Site Layout.

**Walgett Town Flood Levee '**

**WALGETT**

**Bate Street**

Figure 2(a) - General Site Access Layout

VEGETATION: The vegetation surrounding the facility is primarily grassy scrubland with

tree stands to the Northeast, West and South. These are generally native species (eucalypts, etc)

TOPOGRAPHY: The topography of the site is described as gently sloping with drainage

flow paths to the Northwest (NW and W grassy pasture area) along with a defined drainage channel which drains from the effluent ponds in the North and Northeast boundary toward the Southwest before exiting the site.

## **2.2 Facility Description**

2.2.1 Site Activities

The **'Walgett Sewage Treatment System'** operates under an Environmental Protection Licence (EPL) being L13056, issued by the NSW EPA, which relates to 'Sewage treatment processing by small plants'.

Unlike a purely facility based EPL, which normally refers to a specific premises that is defined within clear property / parcel boundaries, the EPL for the STP incorporates infrastructure beyond the STP property / site. In effect, the EPL includes several functional components:

1. The Walgett Sewage Treatment Plant: which includes the effluent treatment structures, control rooms, site office / amenities etc.
2. The Reticulation system owned and operated by the licencee that is associated with the 'sewage treatment plant' which effectively means the network of sewer pipes, mains and pump stations etc that direct wastes to the STP; and
3. The Effluent Ponds / Utilisation Area: which receive treated effluent waters from the STP before off site discharge occurs.

Figure 2(b) below depicts the arrangement and flowpath relationships of the key EPL components.



**WALGETT SEWAGE TREATMENT SYSTEM - EPL 13056**

**Effluent  
Treatment  
Ponds and  
Utilisation  
Areas**

**WALGETT**

**Sewer Reticulation Area  
(indicative)**

**Treated**

**discharges**

**Sewage Treatment Plant (STP)**

Figure 2(b) - Indicative EPL components - Walgett Sewage Treatment System

For the purposes of this PIRM PLAN, the term 'Walgett Sewage Treatment System' can be collectively taken to refer to all the components listed above.

The term 'facility' infers the STP, Effluent Treatment Ponds and Utilisation areas collectively. (i.e. All infrastructure located within the EPL referenced parcel). The EPL facility is not open to the general public and WSC staff are infrequently on site at times generally between the hours of approximately 7:00am to 4:00pm weekdays and for limited hours over the weekends and public holidays.

The term STP generally relates to the constructed buildings, filters etc where primary treatment activities occur. The STP itself is entirely surrounded by a raised soil levee which provides relatively good flood protection and atop the levee is fully security fenced, gated and secure. The remainder of the facility is secured with stock fencing only and surrounded by limited flood protection only. Accessibility for the site with the exception of the STP would essentially be considered 'unsecured'.

The external sewer reticulation area has quite varied accessibility but would essentially be considered unsecured (passing through public / private lands).

2.2.2 Site Plan

The Site Services and Infrastructure Plan shows the overall site arrangement, activity areas, the locations of first response equipment in the event of a pollution incident, together with identification of the sources of potential pollutants.

The detailed Site Services and Infrastructure Plan can be located in Appendix 15 or Figures 2 (a) and (b) of this document.

Note: The entire reticulation network is not shown in detail due to its overall scale and changing nature / ongoing

extension as development of the area progresses.

## 3.1 Prevention as an Incident Response

# 3. POLLUTION INCIDENT PREVENTION & PREPAREDNESS

WSC is committed to minimising the circumstances under which pollution incidents may occur. Through the use of regularly scheduled meetings, employee and contractor's orientations, training programs, routine inspections of activity areas and the application of standard operational procedures, Council Employees and any contractor's personnel will be able to identify and respond to conditions that might lead to a pollution incident.

Council Employees are instructed, as part of their site inductions and ongoing training, in the steps to report and respond to facility conditions or issues that might give rise to pollution incidents where these conditions/issues are found to exist.

Pre-emptive actions are also undertaken to minimise or prevent any risk of harm to human health or the environment arising from the activities of the operations generally. These are summarised as follows:

***Table 1 - Summary of Pre-emptive Actions:***

|  |  |
| --- | --- |
| STP & Reticulation Area (generally):   * Raw Sewage overflow * Chemical spill * Oil / fuel spills * Explosion (Biogas) * Fire   Effluent Ponds / Utilisation Areas:   * Surface water contamination | * Reticulation inspection, monitoring & preventative maintenance to reduce infiltration & inflows, identify system failures (actual or likely), choke point trends etc * System redundancies and bypass processes incorporated in infrastructure design and operational plans * Spare capacity in catchall or bypass pond/s at STP * SCADA testing and alarming * Electrical systems protection / backups / generator connectivity * Quick response / dual crew approach to sewer chokes / blockages or failures * Inflow, weather conditions & environmental monitoring in place * Principally a gravity feed reticulation system (not as susceptible to power outages / pump station issues) * Levee installed around STP to minimise flood water ingress / damage.   Along with other actions detailed in SOPs or Checklists  (refer Appendices 6 to 12) |

## **3.2 Register of Potential Pollutants**

Potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises together with storage locations are summarised as follows:

***Table 2 - Summary of Potential Pollutants***

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| pollutant  type/  SUBSTANCE | SOLID,  LIQUID,  GAS or  powder | QUANTITY | LOCATION  (see Site Plan) | type of  CONTAINMENT | MSDS |
| Unleaded Fuel | Liquid | <20 litres | Storage Shed 2 | Drum / jerry can | Chem  watch |
| Motor Oil | Liquid | <5 litres | Storage Shed 2 | Domestic  Packaging |
| Lab Chemicals, Reagents and cleaning products | Powder / liquids | < 5 kg total | Amenities / Lunchroom Room / Lab & Storage 1 Building | Domestic  Packaging |
| Paint | Liquid | < 20 litres | Storage Shed 2 | Domestic  Packaging |
| Herbicides / Pesticides | Liquid / Powder | Up to 20 litres & up to 5 kg | Storage Shed 2 | Domestic  Packaging |
| Effluent and waters | Liquid | Varied (>5ML) | Throughout entire 'System' | Earth ponds, drains and reticulation structures | N/A |
| Grit & Screening | Solid | <2m3 exposed | Grit / Screenings Disposal Area | Buried | N/A |
| Bio-Gas | Gas | varied | Sub & Surface Structures adjacent to (Nth & Sth sides) and including the Process Control Area | N/A  (Passive  venting) | N/A |

## **3.3 Nature and Likelihood of Pollution Incidents**

Notwithstanding WSC's commitment to preventing conditions/issues which might give rise to a pollution incident, it is not possible to negate all situations which might give rise to an incident.

Possible pollution incidents associated with the operation of the Facility are:

* Sewerage overflow or escape from reticulation area OR bypass, failure or flooding of STP.
* Fire within the STP.
* Spill of chemical, fuel, oils or other hazardous materials from containments, tanks etc.
* Biogas build up and explosion.
* Surface water pollution from effluent pond systems or STP discharges / flooding.

Having regard to the nature of the operations of the Walgett Sewage Treatment Plant, the level of risk posed by the possible pollution incidents to the environment and the need and priority for management action, is qualified for the facility using the following methodology.

Inherent risk will be assessed by combining the likelihood and consequence of the identified potential risk. In determining the assessment of the likelihood and consequence, the following rating processes has been utilised.

1. Likelihood

Determination of the probability or likelihood of environmental harm, damage or loss occurring as a result of a pollution incident using the ranking risk factors by probability methodology contained in the following table.

***Table 3 - Incident Likelihood Descriptions***

|  |  |  |
| --- | --- | --- |
| rating | MEASURE | description |
| 1 | Rare | May occur only in exceptional circumstances. |
| 2 | Unlikely | Could occur at some time. |
| 3 | Possible | Might occur at some time. |
| 4 | Likely | Will probably occur in most circumstances. |
| 5 | Almost certain | Is expected to occur in most circumstances. |

1. Consequence

Determination of the consequence of the potential environmental harm, damage or loss using the ranking risk factors by consequence methodology contained in the following table.

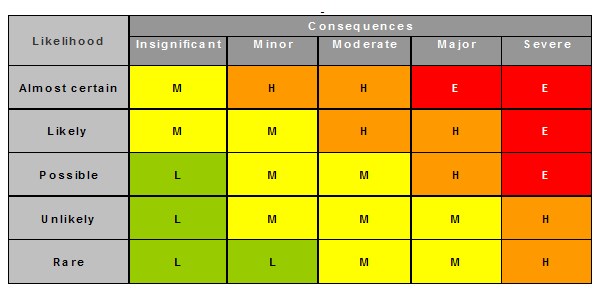
Table 4 - Incident Consequence Descriptions

|  |  |  |
| --- | --- | --- |
| RATING | MEASURE | DESCRIPTION |
| 1 | Insignificant | Environmental impact is undetectable |
| 2 | Minor | Environmental impact is virtually undetectable. |
| 3 | Moderate | Minor (usually reversible) some potential for low level environmental impacts which can be easily managed |
| 4 | Major | Major environmental impact which is reversible |
| 5 | Severe | Major environmental impact which may be irreversible |

1. Risk Evaluation

Individual evaluation of the management priority for each potential pollution incident using the risk priority matrix presented in the following figure.

***Figure 3 - Risk Evaluation Matrix:***



|  |  |
| --- | --- |
| **RATING** | **DEFINITION** |
| **LOW** | Review consequence and likelihood and manage through routine procedures |
| **MOD** | Ensure management system controls risk and managerial responsibility is defined. |
| **HIGH** | Ensure system and process controls are such that the risk is as low as is reasonably practicable and that due diligence systems are established so that appropriate management processes can be demonstrated to be in operation. |
| **EXTREME** | Risk must be reduced or eliminated. If the risk cannot be reduced from “Extreme”, then management must provide continuing assurance that due diligence systems are in place so that appropriate management can be demonstrated. |

For the purposes of this PIRM PLAN:

* EXTREME / HIGH risks will be eliminated or managed.
* MODERATE risks will be monitored.
* LOW risks will be accepted.

The Residual risk has been shown by measuring the inherent risk against the assessed effectiveness of the controls. The outcomes of the risk assessment together with the relevant incident control / management action are summarised in Table 5 following:

***Table 5 - Risk Identification & Management Plan***

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| POLLUTION HAZARD / HAZARD (OTHER) | RISK FACTORS | OUTCOME | LIKELIHOOD / CONSEQUENCE (RATING) | PRE-EMPTIVE ACTIONS | REFERENCE | LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING) | INCIDENT RESPONSE ACTIONS REFERENCE |
| 1. ENVIRONMENTAL (a) Sewerage Discharge (Off Site) | Stormwater inflow leads to overtopping | Contamination of adjacent land and / or waterways | Likely / Moderate (HIGH) | Routine reticulation inspection for illegal connections to system, drainage anomalies etc  Inflow monitoring  Bypass procedures  Surcharge point locations generally in low risk areas | Plant &  System Design  Operational / Maintenance Works Program  Checklists (Appendix 14 of the PIRM PLAN) | Unlikely / Moderate (MODERATE) | SOP detailed in PIRM PLAN Appendix 7 (if incident leads to overflow)  STP Bypass Emergency Response Plan |
|  | Pump  breakdown /  pipeline  failure | Contamination of adjacent land and / or waterways | Likely / Moderate (HIGH) | Routine inspections.  Scheduled maintenance servicing of pump and pump connections  Standby pumps and service parts available | Unlikely / Moderate (MODERATE) | SOP detailed in PIRM PLAN Appendix 7 (if incident leads to overflow)  STP Bypass Emergency Response Plan |
|  | Chokes, Blockages & structure failure | Contamination of adjacent land and / or waterways | Likely / Moderate (HIGH) | Routine reticulation inspection & maintenance, relining programs, sewer jetting etc | Unlikely / Moderate (MODERATE) | Sewerage Overflow Response Plan |
|  | Electrical Systems / Supply failure | Contamination of adjacent land and / or waterways | Likely / Moderate (HIGH) | Maintain SCADA systems with multiple redundancies / checks / alarms including power loss  Emergency generator connectivity to STP | Unlikely / Moderate (MODERATE) | Sewerage Overflow Response Plan |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| POLLUTION HAZARD / HAZARD (OTHER) | RISK FACTORS | OUTCOME | LIKELIHOOD / CONSEQUENCE (RATING) | PRE-EMPTIVE ACTIONS | REFERENCE | LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING) | INCIDENT RESPONSE ACTIONS REFERENCE |
|  | Effluent pond rupture | Contamination of adjacent land and / or waterways | Possible/  Moderate  (MODERATE) | Routine inspections | Plant &  System Design  Operational / Maintenance Works Program  Checklists (Appendix 14 of the PIRM PLAN) | Rare / Moderate (MODERATE) | SOP detailed in PIRM PLAN SOP Appendix 6 SOP Appendix 7  STP Bypass Emergency Response Plan |
| (b) Fire | Electrical /  mechanical  equipment  overheating,  chemical  reaction | Combustion creates smoke and oil residues | Possible/  Moderate  (MODERATE) | Routine inspections  Plant designs not altered without  authority  Maintenance programs routinely completed  Fire protection for critical / high risk infrastructure  HAZMAT storage per relevant standards | Rare / Moderate (MODERATE) | SOP detailed in PIRM PLAN Appendix 11  Appendix 12 |
| (c) Chemical Spills | Chemical spill from ruptured or leaking storage containers | Soil / water contamination Creation of volatile / toxic fumes Explosion / fire Contamination of adjacent land and / or waterways | Possible/  Major  (HIGH) | Retain minimum quantities on site | Rare / Moderate (MODERATE) | SOP detailed in PIRM PLAN Appendix 8 |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| POLLUTION HAZARD / HAZARD (OTHER) | RISK FACTORS | OUTCOME | LIKELIHOOD / CONSEQUENCE (RATING) | PRE-EMPTIVE ACTIONS | REFERENCE | LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING) | INCIDENT RESPONSE ACTIONS REFERENCE |
|  | Incompatible or incorrect chemical storage | Explosion / fire / fumes release | Possible/  Major  (HIGH) | Retain minimum quantities on site | Plant &  System Design  Operational / Maintenance Works Program  Checklists (Appendix 14 of the PIRM PLAN) | Rare / Moderate (MODERATE) | SOP Appendix 9 detailed in PIRM PLAN |
| (d) Oil / Fuel Spills | Failure of fuel containers or storage tanks | Explosion / fire  Contamination of adjacent land and / or waterways Creation of volatile fumes | Possible/  Major  (HIGH) | Retain minimum quantities on site | Rare /  Moderate  (MODERATE) | SOP Appendix 10 & 11 detailed in PIRM PLAN |
|  | Failure of mobile / fixed plant  hydraulic lines | Fire  Contamination of adjacent land and/or waterways | Possible/  Major  (HIGH) | Routine plant inspection and servicing. | Rare / Moderate (MODERATE) | SOP Appendix 10 & 11 detailed in PIRM PLAN |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| POLLUTION HAZARD / HAZARD (OTHER) | RISK FACTORS | OUTCOME | LIKELIHOOD / CONSEQUENCE (RATING) | PRE-EMPTIVE ACTIONS | REFERENCE | LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING) | INCIDENT RESPONSE ACTIONS REFERENCE |
| (e) Gas Release (Biogas) | Bio-gas passive or forced ventilation blockage / failure | Explosion / fire  Creation of volatile / hazardous fumes | Possible / Major (HIGH) | Fire protection supplied Passive venting adequate Smoking restrictions within STP | Plant &  System Design  Operational / Maintenance Works Program  Checklists (Appendix 14 of the PIRM PLAN) | Rare / Major  (MODERATE) | SOP detailed in PIRM PLAN Appendix 11 Appendix 12 |
| (f) Cumulative Pollution (Surface Waters) | Discharge loads to environment | Contamination of  adjacent  waterways | Possible /  Major  (HIGH) | Environmental Monitoring and Assessment reviews  Management and operational reviews to maximise plant efficiency and discharge quality | Plant &  System Design  Operational / Maintenance Works Program  Checklists (Appendix 14 of the PIRM PLAN) | Rare /  Moderate  (MODERATE) | SOP detailed in PIRM PLAN Appendix 7 |
| (2) COMPLIANCE  (a) Incident Reporting | Non compliance with statutory reporting | Cautionary Notice Penalty Infringement Notice | N/A | Prepare reports as required | Operational Checklist as provided in Appendix 14 of the PIRM PLAN | N/A | SOP detailed in PIRM PLAN Appendix 4 Appendix 5 |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| POLLUTION HAZARD / HAZARD (OTHER) | RISK FACTORS | OUTCOME | LIKELIHOOD / CONSEQUENCE (RATING) | PRE-EMPTIVE ACTIONS | REFERENCE | LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING) | INCIDENT RESPONSE ACTIONS REFERENCE |
| (3) WORK HEALTH & SAFETY | Personal injury to staff, maintenance / construction contractors or visitors to the facility | Trauma Lost time Rehabilitation Compensation | Likely / Major (HIGH) | Regular tool box meetings with staff and contractors  Safe Work Method Statements prepared and implemented  Risk assessments undertaken & Safety plans developed for works  Staff training  Job and site specific orientation for new staff and contractors  Independent audit of all systems of work  Emergency and evacuation plans prepared and tested | Established tool box meeting protocols  Council's corporate Work Health, and Safety Plan | Unlikely / Moderate (MODERATE) | SOP detailed in PIRM PLAN  Appendix 2  Appendix 12 |

## **3.4 Incident Preparedness**

3.4.1 Response Equipment and Features

The Walgett Sewage Treatment Plant has a number of active and passive pollution control / safety devices and equipment that can be used during a pollution incident.

Relevant details of pollution incident equipment and emergency features are provided as follows:

***Table 6 - Response Equipment Inventory***

|  |  |  |  |
| --- | --- | --- | --- |
| equipment | location/s | quantity | maintenance  requirements/standards |
| Fire extinguisher | Amenities / Lunchroom Room / Lab & Storage 1 Building  Process Control Area | 1  1 | Six monthly inspections and tagging |
| Chemical spill kit | Amenities / Lunchroom Room / Lab & Storage 1 Building | 1 | Weekly Inspection |
| Fire Blanket | Amenities / Lunchroom Room / Lab & Storage 1 Building | 1 | Weekly Inspection |
| First Aid Kits | Amenities / Lunchroom Room / Lab & Storage 1 Building | 1 | Weekly Inspection |
| Davit Arm | South side Process Control Area (fixed) | 1 | Six monthly inspections and tagging |

Equipment such as portable fire extinguishers, fire blankets, hose reels and fire hydrants should only be used by persons who are suitably trained and when it is safe to do so. The maintenance of the systems and equipment is to be undertaken in accordance with the standards nominated in the Table above.

* + 1. Communication System

A telephone system is installed within the Walgett Sewage Treatment Plant with this system providing for communication both internally (mobiles etc) and externally except during flood events where the STP becomes isolated / inundated.

In a non flood related pollution incident, the telephone can be used as a means of notifying those individuals/organisations responsible for activating this PIRM PLAN and managing the incident response.

In addition to the telephone system, mobile telephones will be an accepted means of communications.

Council vehicles used in response activities within the Reticulation network are equipped with a two way radio system and operators with mobile telephones to enable communication.

Communication mechanisms for neighbouring properties, issuing media releases and providing information on Council's web site are detailed in the Summary of Community Notification & Communication provided in Table 9 of Section 4.3.2

* + 1. Security

Access to the Walgett Sewage Treatment Plant by unauthorised persons and unauthorised activities occurring on the site are controlled by Council site personnel and man proof fencing around the STP.

* + 1. First Aid Equipment

Suitably stocked and easily accessible first aid kit/s are provided at the facility with locations being clearly signed. First aid kits are also available within Council vehicles.

* + 1. Signs & Labels

Suitable signage indicating the location of incident response equipment & features and the first aid kits will be provided and maintained within the facility.

A list of emergency phone numbers will be clearly displayed at a location within the facility that can be seen by Council Employees and any contractors / visitors.

* + 1. Funding Arrangements and Support

The cost of any clean up that is undertaken by emergency response agencies and the EPA will generally be recovered from a company (Council) or individual responsible for the pollution incident.

Having regard to the above the following pollution incident funding arrangements are in place:

* Funds within Council's Restricted Reserve/s
* Public liability insurance policies

# **4. POLLUTION INCIDENT CONTROL & RESPONSE**

## **4.1 Key Facility Incident Management Contact Details**

The following is a list of incident response individuals who are responsible for activating the PIRM PLAN together with their notification and communication responsibilities:

***Table 7 - PIRM PLAN Contact Personnel:***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name** | **Position** | **Contact Details (24 Hours)** | **Notification / Responsibilities** | **Communication / Responsibilities** |
| Various | STP operator | 0408 395 947 | Emergency Services On-site Contractors A/Manager Water Engineer (WSC) |  |
| Allan Middleton | Operator in Charge (WSC) | 0408 395 947 | Emergency Services On-site Contractors | Emergency Services Director Engineering (WSC) On-site Contractors |
| Tom Baldwin | Manager Water/Sewer & Waste Engineer (WSC) | 0419 995 062 | Director Engineering (WSC) | Emergency Services On-site personnel |
| Kazi Mahmud | Director Engineering (WSC) | 0408 460 528  02 6828 6100 | Emergency Services  EPA  Ministry of  Health  SafeWork NSW  Fire and Rescue  WSC GM | Emergency Services  WSC site personnel /  EPA & Lead Agencies  Media & Ministries  within delegations |
| Megan Dixon | General Manager (WSC) | 0459 685 091  02 6828 6100 | Mayor & Councillors | Media, Councillors & wider Community |

The above details are to be verified annually and updated whenever a change in personnel or responsibility has occurred.

## **4.2 Key Incident Contact Details**

The following is a list of incident response individuals and organizations that may be needed during a pollution incident.

***Table 8 - PIRM PLAN Emergency Agency Contacts:***

|  |  |  |
| --- | --- | --- |
| organisation | contact NAME | contact details |
| Fire & Rescue NSW | Duty Officer | 000  1300 729 579 |
| NSW Police | Duty Officer | 000  02 6820 3999 |
| Ambulance Service of NSW | Duty Officer | 000  131 233 |
| Walgett Hospital | Reception | 02 6817 9400 |
| Environment Protection Authority (EPA) | EPA Environment Line | 131 555 |
| Narrabri Office | **02 6792 4020** |
| NP&WS | Parks & Wildlife Regional Office | 02 6792 7300  (Narrabri) |
| SafeWork NSW | Duty Officer | 131 050 |
| Department of Primary Industries (NSW Fisheries) | Reception | 1800 043 536 |
| POISONS Information | Duty Officer | 131 126 |
| NSW Ministry of Health | Reception | (08) 8080 1499  (Broken Hill)  02 9391 9000 |
| Department of Families & Community Services | Reception | 1800 079 098 |
| State Emergency Service (SES) | Duty Officer | 132 500 |
| Roads & Traffic Authority | Reception | 132 213 |
| Bureau of Meteorology | General Information | 1300 659 218 |

This list is to be verified at least annually and updated whenever an organization advises that a change has occurred.

## **4.3 Incident Notification and Communication**

Note: For the purposes of this section, the location of an incident will determine the individual who is the '*relevant supervisor*' and is responsible for the actions required in each clause. For clarity the '*relevant supervisor*’ for incidents within the:

* STP *is the* Sewage Treatment Plant Operator in Charge (WSC)
* Reticulation network *is the* Water & Sewerage Maintenance Supervisor (WSC)

1. Incident Notification

In order to provide for the safety of employees, contractors, visitors and the wider community, along with ensuring appropriate pollution incident response, it is essential that early warning and notification of pollution incidents are made so that incident response procedures can be implemented and incident response organisations notified of the situation.

The prompt notification of an incident can often greatly assist in ensuring that the risk of injury, death, damage or environmental harm is minimized.

In this regard the following incident notification procedures are to be implemented:

1. Small Area / Minor Incidents

Incidents such as small chemical spills or individual medical emergencies will generally not require the notification of incident response agencies. However, it will be the general practice that ALL incidents will be notified immediately by the relevant supervisor to the Director Engineering (WSC) so that an assessment of the level of response required can be made AND if a notification to one / all agencies is required.

The mobile telephone contact will be the preferred means of reporting such incidents.

An incident report notification form, included as Appendix 4, is to be completed and forwarded to the Director Engineering (WSC) for any minor incident or event.

4.3.1.2 Major Incident

A major incident is *where material harm to the environment is caused or threatened.*

Where a major incident occurs, the Director Engineering (WSC) is to immediately implement the pollution notification protocol included as Appendix 5.

Importantly Appendix 5 requires the immediate notification of:

131 555

EPA

Ministry of Health via the local Public Health Unit

(08) 8080 1499

13 10 50

WorkCover

6828 6100

Council

Fire & Rescue NSW (if not called for initial emergency response) 1300 729 579

In addition to the immediate notification of any major pollution incident, an incident report notification form, (refer to Appendix 4), is to be completed and forwarded to the **Director Engineering (WSC)**.

1. Community Notification and Communication

Communicating with neighbours and the local community is an important element in managing the response to any pollution incident.

In this regard the following notification and communication action plan will be applicable to a MAJOR pollution incident at the Walgett Sewage Treatment Plant or the associated reticulation network.

The following action plan has been based upon the pollution incident risk assessment included in Section **3.3** of this PIRM PLAN.

Note:

WSC observes the legislative definition of a 'pollution incident' and notification protocols but may choose to implement parts of the Communication Action Plan (for neighbours and agencies) for lesser level incidents if there is merit in doing so (general courtesy, commitments to specific neighbours / complainants etc). There is no obligation to notify and the decision will be made by the *Director Engineering (WSC)* on a case by case basis.

Page 28 of 66

***Table 9 - PIRM PLAN Community Notification & Communications Plan:***

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NATURE OF INCIDENT | IMPACT ON COMMUNITY | NOTIFICATION  REQUIREMENTS | RESPONSIBILITY | NOTIFICATION MECHANISM / TOOLS | KEY MESSAGE |
| Sewage overflow | Local impact, | EPA | Director Engineering | Phone call to EPA Environment Line | Assessment of severity |
| (Reticulation network) | ranging from MINOR to SEVERE | (if pollution incident defined in PIRM PLAN - apply notification protocol in Appendix 5) | (WSC) | followed by a written report | Type & quantity of material involved |
|  | depending on the severity of discharge | As above | Doorknock / leaflet drop to directly | Explanation of what happened Date and time of incident Response actions taken  Refrain from contact with spill / |
|  |
| Occupiers of neighbouring |
|  |  | directly impacted properties |  | impacted properties | exclude children / animals from spill |
|  |  | Local Community / Media | Director Engineering | Information displayed on Council's | Strategy for prevention of recurrence |
|  |  |  | (WSC) | web site |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NATURE OF INCIDENT | IMPACT ON COMMUNITY | NOTIFICATION  REQUIREMENTS | RESPONSIBILITY | NOTIFICATION MECHANISM / TOOLS | KEY MESSAGE |
| STP Sewage discharge | Local impact, | EPA |  |  |  |
| (off site) | ranging from MINOR to SEVERE depending on the severity of discharge | (if pollution incident defined in PIRM PLAN - apply notification protocol in Appendix 5) | Director Engineering  (WSC) | Phone call to EPA Environment Line followed by a written report  Phone call or doorknock / leaflet drop to occupiers of impacted | Assessment of severity  Type & quantity of material involved  Explanation of what happened |
|  |  | Occupiers of neighbouring |  | neighbouring downstream | Date and time of incident |
|  |  | downstream properties |  | properties | Response actions taken |
|  |  | (see Appendix 13 for |  |  |  |
|  |  | Communication Recipients Schedule) |  | Signage on recreational waters | Refrain from contact with spill / |
|  |  |  | where human health risk likely | exclude animals and pets from spill |
|  |  | Local Community / Media | Director Engineering | Information displayed on Council's | Actions by WSC / required from |
|  |  |  | (WSC) | web site | residents |
|  |  |  |  | Media release | Strategy for prevention of recurrence |
| Fire (STP) | Local impact, | EPA | Director Engineering | Phone call to EPA Environment Line | Date and time of incident |
|  | ranging from MINOR to SEVERE depending on the severity of the fire | Occupiers of neighbouring properties  (see Appendix 13 for Communications Recipients | (WSC) | followed by a written report  Phone call or doorknock to occupiers of impacted neighbouring properties | Response actions taken Type of fire Agency responding |
|  |  | Schedule) |  |  | Close windows / doors |
|  |  | Local Community / Media | Director Engineering | Information displayed on Council's | Strategy for prevention of recurrence |
|  |  |  | (WSC) | web site |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NATURE OF INCIDENT | IMPACT ON COMMUNITY | NOTIFICATION  REQUIREMENTS | RESPONSIBILITY | NOTIFICATION MECHANISM / TOOLS | KEY MESSAGE |
| Chemical / Hazardous materials spill or release (resulting in off site discharge or impact) | Local impact, likely to be MINOR | EPA  Occupiers of neighbouring properties (if impacted)  (see Appendix 13 for Communications Recipients Schedule) | Director Engineering (WSC) | Phone call to EPA Environment Line followed by a written report  Phone call to occupiers of impacted neighbouring properties or doorknock / leaflet drop | Date and time of incident Response actions taken Type of Spill Agency responding  Refrain from contact with soil / water, close windows and doors etc |
|  |  | Local Community / Media | Director Engineering (WSC) | Media release / Information displayed on Council's web site | Strategy for prevention of recurrence |
| Oil / fuel spill (off site discharge) | Local impact, likely to be MINOR | EPA  Occupiers of neighbouring properties (if impacted)  (see Appendix 13 for Communications Recipients Schedule) | Director Engineering (WSC) | Phone call to EPA Environment Line followed by a written report  Phone call to occupiers of impacted neighbouring properties or doorknock / leaflet drop | Date and time of incident  Response actions taken  Type of Spill  Agency responding  Refrain from contact with soil / water |
|  |  | Local Community / Media | Director Engineering (WSC) | Media release / Information displayed on Council's web site | Strategy for prevention of recurrence |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NATURE OF INCIDENT | IMPACT ON COMMUNITY | NOTIFICATION  REQUIREMENTS | RESPONSIBILITY | NOTIFICATION MECHANISM / TOOLS | KEY MESSAGE |
| Explosion (e.g. Biogas) | Local impact, | EPA | Director Engineering | Phone call to EPA Environment Line | Assessment of severity |
|  | ranging from MINOR to SEVERE | Occupiers of neighbouring properties  (see Appendix 13 for Communications Recipients | (WSC) | followed by a written report  Phone call to occupiers of impacted neighbouring properties (if more than noise only impact) | Agency responding Date and time of incident Type of release |
|  |  | Schedule) |  |  | Stay indoors & close doors windows, re-circulate or close ventilation etc |
|  |  | Local Community / Media | Director Engineering | Media release / Information | Strategy for prevention of recurrence |
|  |  |  | (WSC) | displayed on Council's web site |  |

Note: For the purposes of this section, the term 'facility' refers to the STP. Should a significant sewer overflow impact a residence property within the reticulation area, WSC may choose to temporarily *relocate* occupant/s as the situation requires.

## 4.4 FACILITY EVACUATION

1. General Requirements

Most MINOR pollution incidents will not require the evacuation of all or in most instances even part of the facility. However, it is acknowledged that any MAJOR incident may require the facility to be evacuated.

In the event of a MAJOR incident evacuation of Council Employees, any contractor's & staff and visitors is of the utmost importance.

In order to achieve a safe and timely evacuation, it is critical that an early warning of the pollution situation be communicated and action implemented to remove Council Employees, contractor's staff and visitors from the hazard area.

In this regard the standard operating procedures applicable to Facility Evacuation, refer to Appendix 12, must be implemented once a decision is made to evacuate the facility.

Whilst the need for evacuation will be dependent upon the nature and scale of an incident it is of primary importance that personnel or public health is not put at risk at anytime during a pollution incident. The decision to evacuate (in part of full) is to be made by the Chief Warden (generally this would STP Operator in Charge (WSC) or other most senior staff member at the site) and supported by personnel OR as directed by a responding Emergency Service.

1. Stages of Evacuation

There are 2 stages of evacuation that are applicable to the facility being;

* Stage One: Immediate Area - The evacuation of persons in immediate danger.
* Stage Two: Total Facility - A complete evacuation of the Facility by all people.

In the event of a Total Facility Evacuation, the Facility is not to be re-entered unless instructed to do so by the Director Engineering (WSC) OR as directed by a responding Emergency Service.

The Chief Warden is responsible for prioritising the order in which people are evacuated from the site of the incident. Generally the following priorities apply:

* Ambulatory
* Semi-ambulant (people requiring some physical assistance)
* Non-ambulant (people who need to be physically moved or carried)
* Aggressive, violent or resistive people.

The above priority for evacuation is for guidance only, the emergency may dictate otherwise.

Where a person refuses to comply with a direction given by the Chief Warden the following action is to be initiated:

* Ensure that the person has been clearly advised that they are required to evacuate the facility because of an emergency situation that maybe life threatening.
* Notify the Officer-in-Charge of the attending Emergency Service.
  + 1. Mobility Impaired Persons

A register is to be maintained of site personnel who may have a permanent or temporary disability that would impeded their ability to self evacuate if required.

A staff member who works with a person with a disability shall be appointed as that person's carer during an emergency. The procedures for assisting mobility-impaired persons should be discreetly discussed with the individual concerned.

All staff should be trained in methods of assisting mobility-impaired persons during an emergency.

1. Evacuation Assembly Areas

The facility has a designated primary evacuation assembly point.

In the event of an incident requiring the evacuation of the facility, all Council Employees, any contractor's staff and visitors are to immediately leave the facility by the designated route and report to the designated primary evacuation point.

Should the primary evacuation point be in a hazardous area or is unsuitable due to the nature of the threat, evacuees will then be directed to proceed to the designated secondary evacuation point.

On arrival at the designated evacuation assembly point all persons will remain until the Chief Warden has determined the status of all personnel and;

* accounted for all, or
* prepared a list of names and / or numbers of missing personnel or visitors and the location last seen

For the purposes of this PIRM PLAN the following Evacuation Assembly Points are applicable:

Primary Evacuation Point is at the MAIN ENTRY to the Walgett Sewage Treatment Plant where the "Evacuation Muster Point" sign is located.

Secondary Assembly Point may be selected for egress from the site via a path to be determined by the Chief Warden, as the situation permits. This may be necessary where smoke movement is directly toward the primary evacuation point (as an example)

The Site Services and Infrastructure Plan in Appendix 15 shows the location of the Primary assembly point.

1. Post Evacuation Assembly Point

Once the facility has been evacuated to the Primary or Secondary Evacuation Assembly Point and the presence of personnel and visitors confirmed, arrangements will be made by the Director Engineering (WSC) for Council Employees and contractor's staff to be transported / moved to a Post Evacuation Assembly Point which may, depending on time of day etc, be the Council Offices in Fox Street Walgett.

Incident debriefing and incident investigation will be undertaken at the Post Evacuation Assembly Point. Further management instructions will also be provided.

Appendices No 6 to 12 of this PIRM PLAN contain instructions, (Standard Operating Procedures - SOP's), for facility employees / contractor's staff about actions to be taken for personal safety, and the procedures that are to be implemented to help guide management efforts during a pollution incident, such as:

# **5. POLLUTION INCIDENT RESPONSE PROCEDURES**

* Sewage discharge (off-site) from STP or Reticulation network
* Effluent discharge (off-site) from STP
* Fire at STP
* Chemical spill / release to atmosphere
* Oil / fuel spill
* Biogas explosion at STP

# 6. POST POLLUTION INCIDENT ACTIVITIES

This section of the Pollution Incident Response Management Plan identifies actions to support Council and/or contractor's staff following a pollution incident and activities necessary to restore operations at the Walgett Sewage Treatment Plant and associated reticulation network.

Note: For the purposes of this section, the location of an incident will determine the individual who is the '*relevant supervisor*' and is responsible for the actions required in each clause. For clarity the '*relevant supervisor*’ for incidents within the:

* STP *is the* Sewage Treatment Plant Operator in Charge (WSC)
* Reticulation network *is the* Water & Sewerage Maintenance Supervisor (WSC)

## **6.1 Recovery Operations**

The recovery of facility operations and services will depend on the extent of damage suffered by the facility.

The Director Engineering (WSC) will need to prioritise activities that can be accomplished with available staff and resources.

Immediately following the emergency phase of an incident, the Director Engineering (WSC) will develop an operational recovery plan.

A pollution incident must be investigated as soon as possible following its occurrence. The investigation is designed to determine why the incident occurred and what precautions can be taken to prevent a recurrence.

The Director Engineering (WSC) is responsible for ensuring that an incident investigation is conducted following all pollution incidents that occur at the facility.

## **6.2 Incident Investigation (After Action Review)**

1. Small Incidents

For small incidents, the relevant supervisor will normally conduct the investigation.

1. Major Incidents

For major pollution incidents where material harm to the environment is caused or threatened statutory authorities and emergency response agencies will generally be involved in conducting the investigation.

The Director Engineering (WSC) will assist the authorities as needed.

## **6.3 Documentation**

Documentation of response activities is of critical importance following a pollution incident. All records and forms used during the incident to document activities must be retained for future reference.

Following a pollution incident or emergency situation, the Director Engineering (WSC) will have the responsibility for collecting all records and forms used during the incident. These will be used for several purposes, such as incident investigation, insurance claims and potential legal actions.

The Director Engineering (WSC) must prepare a report documenting activities that took place during a major pollution incident.

The report of the Director Engineering (WSC) and all related documentation will be submitted to the **General Manager** (WSC) for review and necessary follow-up actions.

The **Director Engineering (WSC)** will be responsible for any necessary follow up reports to the **EPA or other Agencies**.

## 6.4 Incident Impact Assessment

Following an incident, an assessment of impact that has occurred to the facility, the environment and equipment must be conducted.

The major goal of this assessment will be to determine the extent of damage to facilities and/or the environment resulting from the incident, and identify repairs or restoration that must be initiated to minimise further damage and restore the facility for operational use or to rehabilitate the environment.

The Director Engineering (WSC) will have the primary responsibility for conducting the damage assessment following an incident.

Assistance will be obtained as needed from facility employees and outside organisations, such as ecologists, engineers and clean up contractors.

## **6.5 Incident Debriefing**

The purpose of incident debriefing is to inform employees about any hazards that may still remain on the facility property following the incident and to identify unsafe conditions that may still exist.

## **6.6 After Action Review & PIRM PLAN Update / Amendment**

This will occur within 30 days of any pollution incident.

The After Action Review (AAR) will analyse the actions that took place during the pollution incident (both good and bad) and will seek to identify opportunities to improve the effectiveness of the PIRM PLAN, through Prevention, Preparation, Response and Recovery procedures in place for the facility.

The AAR findings will produce Actions to amend, modify or may determine no change requirements are necessary for the PIRM PLAN.

# END

# APPENDIX 1: PIRM PLAN AMENDMENT NOTIFICATION FORM

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | | | | |
| Following a review of the Pollution Incident Response Management Plan that was conducted on 28/6/24 the plan has been updated. | | | | |
| **DISTRIBUTION**   * Master copy * Site copy * **Director Engineering (WSC)** copy | | | **DATE SENT / ISSUED:** Revision 5 – 28/6/24 | |
|  | |
|  | |
|  | |
| **PAGE**  **NUMBER** | | **PIRM PLAN SECTION** | **DESCRIPTION OF CHANGE** | |
| All | | Entire document | Updated Cover Page & Revision History  Updated references to Urvan Manager to Director Engineering  Updated Table 7 - Contact Details  Insert Appendix 16, 17 & 18 - Training & Testing the Plan & Attendees | |
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| **M A N A G E M E N T A U T H O R I S A T I O N :**  **D A T E D :** | | | | |
|  | I acknowledge receipt of the amendments to this PIRM PLAN and have incorporated these into the document for which I am responsible.  **SIGNED: Megan Dixon**  **DATED: 23/09/2024**  **POSITION**: **General Manager WSC** | | |  |

# APPENDIX 2: **STAFF & CONTRACTOR TRAINING**

**PURPOSE AND SCOPE:**

To ensure the safe and effective operations management at the Walgett Sewage Treatment Plant and Reticulation network, it is essential that all relevant staff receive training appropriate to their position, duties and level of responsibility.

The purpose of this procedure is to outline the minimum training requirements which are applicable to staff involved in these areas of operation.

**PROCEDURE/STANDARD:**

Staffing and training requirements shall be adequate to enable proper management and service delivery

Staff will undergo a variety of training to ensure an adequate level of skill and education is possessed to enable all tasks and activities to be carried out successfully. Training will be conducted in house, on the job or by external providers.

The guidance for specific training programs that are integral to the operation of Council's facilities is described below.

**PROGRAM A - SITE ENVIRONMENT INDUCTION:**

Key points to be covered in this program may include:

* environmental impacts of the facility
* pollution incident response
* hours of operation and site management
* environmental mitigation measures and controls
* record keeping and reporting
* evacuation procedures

This training would generally be provided by the Director Engineering (WSC) when new staff / contractors commence at a site. Ongoing "on the job" training will also be necessary.

**PROGRAM B - FIRE FIGHTING**

Key points to be covered in this program may include:

* Types of fires (e.g. oil, electrical)
* Determining responsibilities in the event of a fire (staff/fire brigade)
* Procedures for extinguishing fires
* Types/location and maintenance of fire fighting equipment
* Prevention of fires
* Procedures for communication in the event of fire

This training would be undertaken in the form of a toolbox talk and may include practical demonstrations. The training would be prepared and delivered by suitably qualified personnel (internal or external). Input may also be provided by officers of the local NSW Fire & Rescue Brigade or NSW Rural Fire Service

**PROGRAM C - HAZARDOUS SUBSTANCES & DANGEROUS GOODS HANDLING**

Key points to be covered in this program may include:

* Use and interpretation of Material Safety Data Sheets
* Identification of hazardous materials
* Handling of hazardous materials
* Labelling of containers
* Storage and transport of hazardous substances and dangerous goods
* Spill / leak management and basic first aid procedures
* Compatibility of materials.

This training would be provided by suitable service provider/s. Where required, additional input may be required from external WorkCover accredited WH&S consultants.

**TRAINING RECORDS**

A record of all training undertaken will be maintained at the Council's Offices and will be made available for inspection by authorised personnel.

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Impacts on the natural environment are minimised
* Operational issues identified
* Demonstrated operational competency
* Employees safety protected
* Health and safety of public / visitors / neighbours protected
* Meeting environmental goal

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

* Violations and/or fines from Regulatory Agencies
* Pollution of the environment
* Unresolved operational issues
* Injury/Death to employee
* Injury/Death to public / visitors

**REVIEWED BY:Tom Baldwin APPROVED BY: Tom Baldwin**

**DATE:23/09/2024 DATE:23/09/2024**

|  |  |  |  |
| --- | --- | --- | --- |
| POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN TRAINING / COMPETENCY SUMMARY | | | |
| OPERATIONAL STAFF | TRAINING / COMPETENCY STREAM | | |
|  | PROGRAM A  Environmental & General Safety Induction for Facility | PROGRAM B  Fire Fighting & Emergency Incident response. | PROGRAM C  Hazardous Substance & Dangerous Goods Management |
| NAME & POSITION | DATE OF TRAINING COMPLETION | | |
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| REVIEWED BY: DATE: | APPROVED BY: DATE: | | |

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| --- | --- | --- |
| FACILITY: WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK | | |
| DATE: | | |
| EMERGENCY SEQUENCE: | TIME | |
| Matters: | Hours | Minutes |
| Incident uncovered |  |  |
| Assessment of significance |  |  |
| Initiation of incident response/notification of incident |  |  |
| Evacuation alarm sounded (if necessary) |  |  |
| Incident control/remediation action commenced |  |  |
| Evacuation commenced (if necessary) |  |  |
| Warden checks for personnel present |  |  |
| Evacuation completed (if necessary) |  |  |
| Pollution contained |  |  |
| Clean up commenced |  |  |
| Clean up completed |  |  |
| All clear given |  |  |
| Pollution Incident Report Form completed |  |  |
| Exercise terminated |  |  |
| COMMENTS: | | |
| 1. Compliance with Standard Operating Procedures (SOP's) | | |
| 2. Competency of Employees assessment | | |
| 3. Time frames for response | | |
| 4. General Comments/Recommendations for action | | |
| OBSERVER | | |
| SIGNED:  DATE: | | |

# APPENDIX 3: **PIRM PLAN EXERCISE RECORD & EVALUATION FORM**

# APPENDIX 4: **POLLUTION INCIDENT REPORTING & RECORDING**

**PURPOSE AND SCOPE**

The purpose of this procedure is to define the pollution incident reporting requirements which are applicable to the operation of the Walgett Sewage Treatment Plant and Reticulation network.

A pollution incident is defined as 'material harm to the environment' as described in section 147 of the Act. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred. A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which material harm is likely to occur.

***Note***

*There is a duty to report pollution incidents under section 148 of the* [Protection of the Environment](http://www.environment.nsw.gov.au/legislation/DECCActsummaries.htm)[Operations Act 1997 (POEO Act)](http://www.environment.nsw.gov.au/legislation/DECCActsummaries.htm) *in addition to EPL condition R2 which reads "The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act. Notifications must be made by telephoning the Environment Line on 131 555.*

***Note***

*Use Attachment A for general pollution incident reporting (not sewage related - STP & Reticulation Network)*

*Use Attachment B for general unauthorised effluent discharge from the STP*

*Use* ***incident form contained in*** *the '****Sewage Treatment Plant Bypass Emergency Response Plan'***

*for sewage discharge / overflow reporting resulting from a bypass event at the STP*

*Use incident form contained in the 'Sewage Overflow Emergency Response Plan' for sewage discharge / overflow reporting resulting from an incident in the reticulation area*

**PROCEDURE/STANDARD**

1. If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release as a first response, (sand bagging, application of spill kit, shutting off the source, construction of temporary bunds/dam etc). Guidance can be found by referring to the Operations Manuals, SOP within the PIRM PLAN and the like.
2. If the incident presents an immediate threat to human health or property, Fire & Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted for emergency assistance - phone 000.
3. At an appropriate time, during an incident, a staff member shall record the following;

* Type and nature of the incident (what happened)
* Notification source and details
* Details of the conversations that may ensue with staff, emergency services and authorities
* Time events
* Actions taken to mitigate the incident
* Details of other actions during the course of the incident management

1. As soon as possible during an incident staff will notify the Director Engineering (WSC) of the incident and provide an update of the action initiated.
2. The Director Engineering (WSC) is to notify the EPA and other agencies in accordance with the protocols in this PIRM PLAN in addition to any parties specified in other plans.
3. The Director Engineering (WSC) is to record the details of the incident on a Pollution Incident Notification Form within 24 hours of the incident commencing.
4. **Post Incident**

Documentation of incident activities is of critical importance following the incident. All records and forms used during the incident to document activities must be retained for future reference.

Following an incident, the Director Engineering (WSC) will have the responsibility for collecting all records and forms used during the incident. These will be used for several purposes, such as incident investigation, insurance claims and potential legal actions.

The Director Engineering (WSC) must, within 24 hours of being notified of a pollution incident, prepare a report documenting activities that took place during the incident.

Where there is potential for litigation in relation to the incident the Director Engineering (WSC) shall prepare a written report for referral to the Council's legal representative

**ATTACHMENTS / ADDITIONAL FORMS**

1. Pollution Incident Report Form
2. Discharge / Overflow Reporting Form

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Details of incident are readily available including information regarding incident response activities
* Demonstrated operational competency
* Meeting environmental goal

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

* Violations and/or fines from Regulatory Agencies

**REVIEWED BY:Tom Baldwin APPROVED BY: Tom Baldwin**

**DATE: 23/09/2024 DATE 23/09/2024**

|  |  |
| --- | --- |
| POLLUTION INCIDENT REPORT FORM (A)  General Pollution Incident at STP or Reticulation Area (Non Sewerage) | |
| DATE OF INCIDENT: | TIME OF INCIDENT: |
| NAME OF REPORTING PERSON |  |
| LOCATION OF INCIDENT  Where did it occur? |  |
| TYPE and QUANTITY of MATERIAL INVOLVED |  |
| Outline ACTIONS initiated IN RESPONSE TO INCIDENT |  |
| Was it necessary to initiate the MAJOR INCIDENT NOTIFICATION PROTOCOL? |  |
| Was the COMMUNITY NOTIFICATION & COMMUNICATION PLAN  activated? |  |
| Was ACTION IN ACCORDANCE WITH SOPS?  If not - why? |  |
| Is there a NEED TO REVIEW  SOP in response? |  |
| DATE and TIME of details provided to:  RELEVANT SUPERVISOR |  |
| OTHER MATTERS |  |
| MANAGEMENT ACKNOWLEDGEMENT: DATED: | |

|  |  |
| --- | --- |
| POLLUTION INCIDENT REPORT FORM (B) Effluent Discharge - STP (Non-Bypass related) | |
| DATE OF INCIDENT: | TIME OF INCIDENT: |
| NAME OF REPORTING PERSON: |  |
| DETAILS of PERSON WITNESSING THE DISCHARGE  or overflow |  |
| LOCATION of incident Where did it occur? |  |
| DATE and TIME of COMMENCEMENT OF the DISCHARGE |  |
| Assessed VOLUME OF DISCHARGE or overflow |  |
| PERIOD OF time the DISCHARGE or overflow occurred (Start / finish) |  |
| WEATHER CONDITIONS at the  time of the discharge or overflow. |  |
| DAILY RAINFALL (mm) on the DAY OF THE DISCHARGE.  RAINFALL (mm each day) for the WEEK PRIOR TO THE DISCHARGE |  |
| SAMPLING OCCURRED?  (Yes / No)?  Most recent MONITORING  RESULTS of the chemical composition of the discharge. | Attach analytical results |
| Explanation WHY & HOW the DISCHARGE OCCURRED |  |
| PLAN OF ACTION to PREVENT a similar DISCHARGE |  |
| OTHER MATTERS |  |
| MANAGEMENT ACKNOWLEDGEMENT: DATED: | |

# APPENDIX 5: **POLLUTION INCIDENT NOTIFICATION PROTOCOL**

CALL '000’ IF THE INCIDENT PRESENTS AN IMMEDIATE THREAT  
TO HUMAN HEALTH OR PROPERTY...

Fire & Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

THEN...

EPA - phone Environment Line on

131 555

The Ministry of Health via the local Public Health Unit (08) 8080 1499

The WorkCover Authority - phone

13 10 50

Council on

02 6828 6100

Fire & Rescue NSW (if not called initially)

1300 729 579

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

**PURPOSE AND SCOPE**

The purpose of this procedure is to define an incident response in the event of a discharge resulting from a rupture of a pond / tank / containment being detected or reported at the Walgett Sewage Treatment Plant

# APPENDIX 6: **EFFLUENT POND / TANK / CONTAINMENT RUPTURE RESPONSE**

**REVIEWED BY:**

**DATE:**

**APPROVED BY:**

**DATE**

**PROCEDURE/STANDARD Discharge to adjacent waterways**

Actions required in response to such events may vary and it will be the role of the STP Operator in Charge (WSC) to determine and initiate appropriate actions in the first instance

The following notes will form the basis of that decision making together with emergency exercises and desktop trials:

* Incidental / permitted under the EPL - NIL substantial addition actions; OR
* Confine sources of inflows to limit the spread of its effects without endangering personnel.

Check process pumps are working or implement bypass process if appropriate.

* Consider construction of sand bag barriers or earth berms to contain or divert the flow and/or excavate temporary retention dams to withhold discharge if other contamination involved.
* Secure the affected area(s) by using barricades and bunting if necessary.
* Advise the Director Engineering (WSC) of all actions taken or proposed.

Director Engineering (WSC) may, among other actions relevant to the type and scale of incident:

* Use tanker trucks / pumps to return retained fluid to system once holding capacity is available.
* Notify neighbours who may be affected by the incident (where human health risk likely).
* Ensure a copy of the Pollution Incident Report Form is referred to A/Manager Water Engineer (WSC)

It is considered essential that all operators using the site are aware and understand the specific emergency and incident response requirements.

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Limit environmental damage
* Health and safety of public / staff protected

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

• Violations and/or fines from Regulatory Agencies

**Tom Baldwin Tom Baldwin**

**23/09/2024 23/09/2024**

23/09/2024

# APPENDIX 7: **ENVIRONMENTAL MONITORING**

**PURPOSE AND SCOPE**

The environmental monitoring program ensures early detection and reporting of possible pollution of surface waters. Sampling locations, analytes and frequencies are identified in the EPL.

**PROCEDURE/STANDARD**

All environmental monitoring at the site occurs in accordance with the requirements of EPL 13056.

WSC and its contractors observe NATA and other industry standards to sample, analyse and report findings to comply with specific EPL requisites and wider EPA public reporting requirements.

**REPORTING**

All results received shall be reviewed by the Director Engineering (WSC) and reported to the NSW Environment Protection Authority (EPA).

If any particularly non-conformant results are received they shall be reported to the EPA within 14 days from receipt of results from the Laboratory or as otherwise required by the EPL

All results must be published to the Council Web page within 14 days following receipt of results from the relevant Laboratory.

**BENEFITS OF COMPLIANCE TO PROCEDURE:**

* Impacts on the natural environment minimised
* Operational issues identified
* Demonstrated operational competency **CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**
* Violations and/or fines from Regulatory Agencies
* Pollution of the environment
* Unresolved operational issues

**REVIEWED BY: APPROVED BY:**

**DATE: DATE**

# APPENDIX 8: **CHEMICAL SPILL RESPONSE**

**PURPOSE AND SCOPE**

The purpose of this procedure is to define an incident response in the event of a chemical spill at the Walgett Sewage Treatment Plant and Reticulation network.

*Notes: Small spills would not normally not reach the threshold to be a 'pollution incident'* PROCEDURE/STANDARD

Actions required in response to such an event may vary and it will be the role of the Director Engineering (WSC) to determine and initiate appropriate actions. The following notes will form the basis of that decision making process.

* Depending on the scale of the spillage, it may be necessary to make first contact with emergency services by dialling 000 and advise of the type of emergency and the assistance needed ( Fire Brigade - HAZMAT)
* Secure the affected area(s) by using suitable means such as barricades and bunting. Engage measures to restrict vehicles entering the site
* If necessary, initiate evacuation of staff and others that may be on site, including contractors
* Where possible, confine the incident and prevent the spread of its effects without endangering personnel. This may include building sand bag bunds, rotating the container or plugging the leak.
* For small spills, use the spill kit kept on site or vehicle, cover drains and/or place temporary bunding
* Advise the Director Engineering (WSC) of all actions taken or proposed.
* Provide any requested assistance to Emergency Services IF SAFE TO DO SO.
* Notify neighbours who may be affected by the incident.
* Report the details of the spill on an Incident Notification Report and refer to the ***Director Engineering*** (WSC)

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Limit environmental damage
* Health and safety of public/visitors protected

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

* Extended environmental damage
* Injury/death to employee
* Injury/death to public / visitors
* Violations and/or fines from Regulatory Agencies

**REVIEWED BY:Tom Baldwin APPROVED BY: Tom Baldwin**

**DATE:23/04/2024 DATE 23/09/2024**

# APPENDIX 9: **STORAGE & HANDLING OF CHEMICAL / HAZARDOUS SUBSTANCES**

PURPOSE AND SCOPE

The use of chemicals and hazardous / dangerous good and substances at the Walgett Sewage Treatment Plant and Reticulation network is extremely limited. Usage includes process & treatment chemicals in addition to paints, solvents, fuels and oils etc for maintenance of site equipment / plant and herbicides / pesticides for controlling pests.

The aim of this procedure is to assist in the identification, handling, storage and disposal of hazardous substances. It includes the use of labels and Material Safety Data Sheets (MSDS), provision of information and training to personnel as well as storage and disposal requirements for use of hazardous substances.

PROCEDURE / STANDARD

1. Purchase of Materials

When a hazardous substance is purchased the supplier must provide sufficient information to ensure that the substance can be handled, stored, transported, used, processed and disposed of safely. Full safety data in the form of a current approved MSDS must be provided by the supplier on the first occasion that a hazardous substance is supplied. The manufacturer shall review and revise the MSDS every five years as a minimum. Suppliers are required to provide MSDS on request.

Whenever possible a non hazardous alternative shall be selected. However where no such alternative is available the most suitable, but least harmful or dangerous, shall be considered.

1. Labelling of Hazardous Substances

Suppliers shall ensure that all containers of hazardous substances for use are appropriately labelled. Where a hazardous substance is decanted and not used or further processed immediately, the container into which the substance is decanted is labelled with the product name and risk and safety information (this does not apply to substances which are decanted and used immediately). Hazardous substance containers shall remain appropriately labelled until they are cleaned and no longer contain any hazardous substance. All containers shall be in suitable condition. Damaged, leaking or corroded containers must not be allowed to remain at the site.

1. Material Safety Data Sheets

Material Safety Data Sheets should contain the following information as a minimum:

* State if the product is classified as a hazardous substance
* Safety Equipment to be worn by the operator when using the substance
* Storage requirements including compatibility with other substances
* Requirements for transport and disposal
* Procedures for cleanup and disposal of spilt product and waste containers
* First aid procedures if the substance contacts skin, eyes, is swallowed or ingested

A register of MSDSs shall be maintained at the facility and made available for use by all employees at site. All MSDS shall be readily accessible to all employees with potential exposure to those substances.

1. **Storage**

Flammable goods need to be stored away from sources of ignition and spillage containment is required. Dangerous goods legislation requires segregation of different classes of dangerous goods and licensing is required when certain quantities are exceeded.

1. **Handling Hazardous Substances and Dangerous Goods**

* Hazardous substances delivered to the facility shall be immediately placed into designated storage areas located within the facility.
* PPE listed in the MSDS shall be used by staff whenever handling materials

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Employee's safety protected
* Health and safety of public / visitors protected
* Impacts on the natural environment are minimised

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

* Injury/Death to employee
* Injury/Death to public/visitors
* Violations and/or fines from Regulatory Agencies

**REVIEWED BY:Tom Baldwin APPROVED BY: Tom Baldwin**

**DATE:23/09/2024 DATE 23/09/2024**

# APPENDIX 10: **FUEL / OIL SPILLS RESPONSE**

PURPOSE AND SCOPE

To define the procedure for the containment, management and cleanup of fuel / oil spills at the Walgett Sewage Treatment Plant and Reticulation network.

Notes: Small spills would not normally reach the threshold to be a 'pollution incident'.

PROCEDURE/STANDARD

Definitions

Fuel / oil spills refers to discharges of petroleum compounds, including petrol, diesel, lubricating oils, hydraulic oils, greases etc. Spillage of oils and fuels may arise from leaking machinery (e.g. burst hydraulic hoses) and spillage of liquids from containers stored at a site.

It is important to take prompt action to clean up any spilt oil or fuel to minimise the risk of accidents occurring and to prevent contamination of local waterways should the spilt fuel / oil enter the site drainage system.

Equipment available to clean up oil spills include oil absorbent pads, "kitty litter", oil absorbent booms and drain blocking pads. Additional materials may be obtained by contacting the Council's Store or Suppliers. This equipment or "spill kit" should be stored close to point of use or in a readily transportable form e.g. on a trailer or in a wheeled bin.

The steps in this procedure shall be as follows:

Depending on the scale of the spillage, it may be necessary to make first contact with emergency services by dialling 000 and advise of the type of emergency and the assistance needed (Fire Brigade - HAZMAT).

IF SAFE TO PROCEED:

1. For mechanical equipment, shut down the item of plant and plug the leak or crimp the hydraulic hose if possible and quickly. For leaking containers, address the source of the leak, but at all times, avoid contact with the material.
2. Isolate adjacent drainage points.
3. Dam and contain the spill using the contents of the spill kit.
4. Recover and absorb.

Once the source of the leak is established, undertake all efforts to prevent further flow, e.g. if leak is from an oil drum, roll drum so that leak areas is uppermost. If leak is from pipe from oil truck, close valves etc. All attempts should be made to plug the leak if safe to do so.

Stop all human and vehicular traffic through the spill area. Isolate sources of ignition and advise fire authorities (and licensing authorities). Mobilise fire extinguishers, if suitable.

Contain the spill as follows:

• Protect drains by forming barriers and sealing drainage grates (e.g. using strong plastic bags partially filled with sand or water). The absorbent socks and pillows can be used to block off drains allowing water to go through but trapping the oil. Absorbent material has limited capacity and needs to be replaced regularly.

* If possible stop the spill from spreading by deflecting the oil into another container.
* Form barriers using absorbent material and place on the edge of the spill (or use any other suitable and available materials, e.g. soil, sand).
* All used absorbent material is to be collected for disposal at a suitable landfill.
* If sufficient product exists, hand pumps should be used and product transferred to a suitable container (lined drums, skips or tankers).
* Avoid the use of electrical equipment / smoking that could be a source of ignition.

***Reporting:***

* Advise the Director Engineering (WSC) of all actions taken or proposed.
* Provide any requested assistance to Emergency Services IF SAFE TO DO SO.
* Notify neighbours who may be affected by the incident.
* Report the details of the spill on an Incident Notification Report and refer to the Director Engineering (WSC)

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Employee's safety protected
* Health and safety of public / visitors protected
* Impacts on the environment are minimised

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

* Injury to employee
* Injury to public / visitors
* Environmental pollution
* Violations and / or fines from regulatory agencies

REVIEWED BY: DATE:

APPROVED BY: DATE

**Tom Baldwin Tom Baldwin**

**23/09/2024 23/09/2024**

|  |  |  |
| --- | --- | --- |
| PURPOSE AND SCOPE | |  |
| To define a procedure for responding to a fire that is detected at the *Walgett Sewage Treatment Plant* | | |
| PROCEDURE/STANDARD | |  |
| Fire |  |  |
| 1. | Attempt to extinguish a small, controlled fire with equipment on site without endangering facility personnel and equipment. This may include the use of a fire hose reel, extinguisher , or isolating the source of the fire and smothering with suitable material or fire blanket | |
| Note: If using a fire extinguisher, be sure to use the correct extinguisher for the fire type. | | |
| 2. | If in any doubt, evacuate area and immediately call '000' and request the presence of Fire & Rescue NSW. Provide all information required (i.e. your name, fire location, type, size etc). | |
| 3. | As soon as possible notify the *Director Engineering (WSC)* of the incident and provide an update of the action initiated to date. | |
| 4. | Keep all unauthorised people away from the area where the fire is burning. | |
| 5. | Provide any requested assistance to Emergency Services IF SAFE TO DO SO. | |
| 6. | Commence notification of Neighbours where offsite smoke / fire or pollution impact is likely. | |
| 7. | Report the details of the fire on a Pollution Incident Notification Report and refer to the *Director Engineering (WSC)* | |
| BENEFIT OF COMPLIANCE TO PROCEDURE: | |  |
| • | Meeting environmental goal. |  |
| • | Employee's safety protected |  |
| • | Health and safety of public / visitors protected | |
| • | Minimise damage to public property |  |
| CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION: | | |
| • | Injury/death to employee |  |
| • | Injury/death to public / visitors |  |
| • | Damage to public property |  |
| • | Violations and/or fines from Regulatory Agencies | |
| REVIEWED BY: | | APPROVED BY: |
| DATE: |  | DATE |

# APPENDIX 11: **FIRE WITHIN THE SEWAGE TREATMENT PLANT**

# APPENDIX 12: **FACILITY EVACUATION**

**PURPOSE AND SCOPE**

To define a procedure covering the requirement to implement an Evacuation of the Walgett Sewage Treatment Plant in an acceptable manner.

**PROCEDURE/STANDARD Emergency Response**

1. Upon notification of an incident the Chief Warden (generally this would be the STP Operator in Charge (WSC) or other most senior staff member at the site) determines the need for evacuation.
2. Chief Warden contacts by telephone the emergency services by dialling '000' providing all information they require (i.e. your name, incident type, size, etc.).
3. Chief Warden sounds the evacuation alarm (if present) or provides evacuation advice to all personnel and visitors on site.
4. The Chief Warden initiates measures to restrict vehicles entering the facility.
5. The Chief Warden determines safe evacuation routes and direct personnel and visitors to the Primary Evacuation area. Where necessary unlock gates on evacuation routes so as to provide for movement to the Primary Evacuation Point or a Secondary Evacuation Point.
6. The Chief Warden provides direction to Primary Evacuation Point.
7. Prior to leaving the facility the Chief Warden with the assistance of any area deputy / area wardens accounts for all personnel including checking of all work areas.
8. Upon arrival at the Primary Evacuation Point the Chief Warden is to;
9. Confirm the presence or otherwise of all personnel/staff and visitors (as far as practical)
10. Determine the suitability of the Primary Evacuation Area. If necessary initiate movement to Secondary Evacuation Point or Post Evacuation Assembly Area.
11. Upon their arrival brief the emergency services including the status of facility personnel.
12. Co-ordinate the movement of personnel to the Post Evacuation Assembly Area.
13. Brief the **Director Engineering (WSC)**

on the incident and provide an update of the action initiated to date.

1. The Chief Warden is to report the details of the event on an Incident Notification Report Form and refer to the Director Engineering (WSC).

**BENEFIT OF COMPLIANCE TO PROCEDURE:**

* Meeting the legislative requirements.
* Improved safety for site staff, contractors and visitors

**CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:**

**APPROVED BY: Tom Baldwin**

**DATE: 23/09/2024**

**DATE: 23/09/2024**

• Death or injury to site staff / visitors REVIEWED BY: Tom Baldwin

• Violations and/or fines from Regulatory Agencies

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| EMERGENCY CHECKLIST FOR CHIEF WARDEN | | | | |
| Name of Chief Warden: | | |  | |
| Time at which potential emergency was raised: | | |  | |
| Location of potential emergency: | | |  | |
| Description of potential emergency: | | |  | |
| IF EMERGENCY IS DECLARED: | | |  | |
| Emergency declared | | | Time | |
| ALERT signal activated (if available) | | | Time | |
| Phone relevant Emergency Service on 000 | | | Time | |
| IF SITE EVACUATION IS NECESSARY: | | |  | |
| Evacuation signal activated / advice issued? | | | Time | |
| Deputy/ Area Wardens report evacuation is complete: | | |  | |
| AREA | WARDEN | AREA EVACUATED | | COMMENTS |
|  |  |  | |  |
|  |  |  | |  |
|  |  |  | |  |
|  |  |  | |  |
| ADVISED EMERGENCY SERVICE: | | | TIME | |
|  | | |  | |
|  | | |  | |

This This

# APPENDIX 13: COMMUNICATIONS RECIPIENTS SCHEDULE (NEIGHBOURS)

Not applicable as there are no nearby neighbours.

# APPENDIX 14: OPERATIONAL CHECKLISTS

WSC has a range of maintenance and operation works program which incorporates general operational functions for staff from Daily through to Annual actions across the operations covered by the EPL. These are 'living' operations guides and are not reproduced in the PIRM PLAN.

The following Operational Checklists define the protocols for undertaking site inspection and audits at the *Walgett Sewage Treatment Plant and Reticulation network* with the aim of:

* minimising the likelihood of a pollution incident occurring
* identifying non-conformance with EPA licence conditions and to implement corrective actions where necessary
* identifying non-conformance with the PIRM PLAN and the implementation of corrective actions

|  |  |  |
| --- | --- | --- |
| AUDITING AND INSPECTION PROGRAM - OVERVIEW | | |
| TYPE OF AUDIT | FREQUENCY | RESPONSIBILITY |
| Site Inspection / General Operations and Maintenance Program compliance monitoring | Daily, weekly, monthly etc | STP Operator in Charge (WSC) |
| Operations Audit | Quarterly, six monthly | Director Engineering (WSC) |
| Environmental Audit | Annual | Director Engineering (WSC) |

These operational Checklists are additional to the Works Programs for the operational areas covered by the EPL.

The inspection and auditing functions are to be undertaken in accordance with the following requirements:

OPERATIONAL CHECKLIST - DAILY

WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK

Record and cleanup and evidence of fuel / lubricant contamination / spillage

Effluent ponds - No evidence of overflows noted or likely

Fuel containers and chemical storages - secured/not leaking/properly sealed / bunded

Perimeter fence line secure and intact (STP)

Record of Incidents or site complaints up to date

**VERIFIED BY: STP Operator in Charge (WSC)**

Satisfactory Unsatisfactory

**DATE:**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| WEEKLY SITE INSPECTION CHECKLIST | | | | | | | | |
| WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK | | | | | | | | |
| DATE: | | | | | | | INSPECTED BY: | |
| ISSUE: | INSPECTION FREQUENCY AND ACKNOWLEDGEMENT | | | | | SATISFACTORY  Y/N | ACTION TAKEN | COMMENTS |
| Hardstand areas, roads and chemical unloading zone free of obstructions | Weekly | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |
| Stormwater infrastructure clear of debris, litter or sediment accumulations | Weekly / After rain | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |
| Emergency spill kits and first aid kits on site and fully stocked | Weekly | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |
| Perimeter fence line secure and intact (STP and Effluent Ponds / Utilisation Areas) | Weekly | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |  |  |  |
| Weather Station Data being recorded / stored appropriately | Weekly | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |  |  |  |
| Test dousing showers (if / when installed) | Weekly | Week 1 | Week 2 | Week 3 | Week 4 |  |  |  |
|  |  |  |  |
| VERIFIED BY: STP Operator in Charge (WSC)  Satisfactory Unsatisfactory  DATE: | | | | | | | | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| QUARTERLY & SIX MONTHLY SITE AUDIT CHECKLIST | | | | | |
| WALGETT SEWAGE TREATMENT PLANT | | | | | |
| DATE: | | | | CONDUCTED BY: | |
| ISSUE | ACTIVITY FREQUENCY AND ACKNOWLEDGEMENT | | SATISFACTORY  Y/N | ACTION TAKEN | COMMENTS |
| EPL Environmental Monitoring undertaken, evaluated and published to webpage within 14 days of receipt from Laboratory | Quarterly |  |  |  |  |
| Fire Safety Certificate inspection undertaken for all essential fire safety equipment onsite. | Quarterly |  |  |  |  |
| Conditions of EPA licence for facility being met | Quarterly |  |  |  |  |
| Breathing Apparatus, PPE and response equipment checks undertaken to ensure maintenance has been affected in accordance with specified frequencies | Quarterly |  |  |  |  |
| Incident reporting - entries correct and complete | Quarterly |  |  |  |  |
| Register of weekly site inspections - current and complete | Quarterly |  |  |  |  |
| Biogas venting (passive or forced) is maintained | Six Monthly |  |  |  |  |
| Review of on-site emergency procedures against PIRM PLAN undertaken | Six Monthly |  |  |  |  |
| VERIFIED BY: Director Engineering (WSC)  Satisfactory Unsatisfactory  DATE: | | | | | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| ANNUAL EPL & PIRM PLAN COMPLIANCE AUDIT | | | | | |
| WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK | | | | | |
| DATE: | | | | CONDUCTED BY: | |
| ISSUE | ACTIVITY FREQUENCY & ACKNOWLEDGEMENT | | SATISFACTORY  Y/N | ACTION TAKEN | COMMENTS |
| Review of EPL environmental monitoring records. | Annual |  |  |  |  |
| Review of operational management documentation including PIRM PLAN, SOPs, Risk registers | Annual |  |  |  |  |
| Toolbox meeting with site staff to ensure an understanding of the PIRM PLAN / EPL requirements are satisfactory | Annual |  |  |  |  |
| Review of non-conformance reports, weekly inspection checklist, Quarter & Six monthly audits, Pollution Incident Records and PIRM PLAN review (occurred as required) | Annual |  |  |  |  |
| Identification and implementation of any improvements to the operation of the facility | Annual |  |  |  |  |
| Annual monitoring reports prepared and submitted to EPA (annual return) | Annual |  |  |  |  |
| **VERIFIED BY:**  Director Engineering (WSC)  **DATE:**  Satisfactory Unsatisfactory  **DATE:** | | | | | |

# APPENDIX 15: SITE SERVICES & INFRASTRUCTURE PLAN

Refer to Figures 2(a) and 2(b).

# APPENDIX 16: PIRM PLAN TRAINING AGENDA

**Walgett Shire Council**

**Training in the Format and Use of a Pollution Incident Response Management Plan (PIRM Plan)**

**Monday 20th May 2024**

**Venue –Walgett Council Offices**

**1:00 pm – Welcome & Introduction**

**PIRM Plan - Background**

* The importance of having good systems in place
* PIRM Plan – background and key components and responsibilities
* Pollution incident prevention, recognition and preparedness
* Pollution incident control and response
* Pollution incident procedures
* Record keeping and reporting

**1:30-2:00 pm**

**Notification, communications and reporting**

* Roles and responsibilities
* PIRM Plan maintenance and revision
* Notification and communications
* Safety of employees and facility users
* The protection of facility assets
* The management of pollution incidents

**2:00-2:30 pm - Exercises**

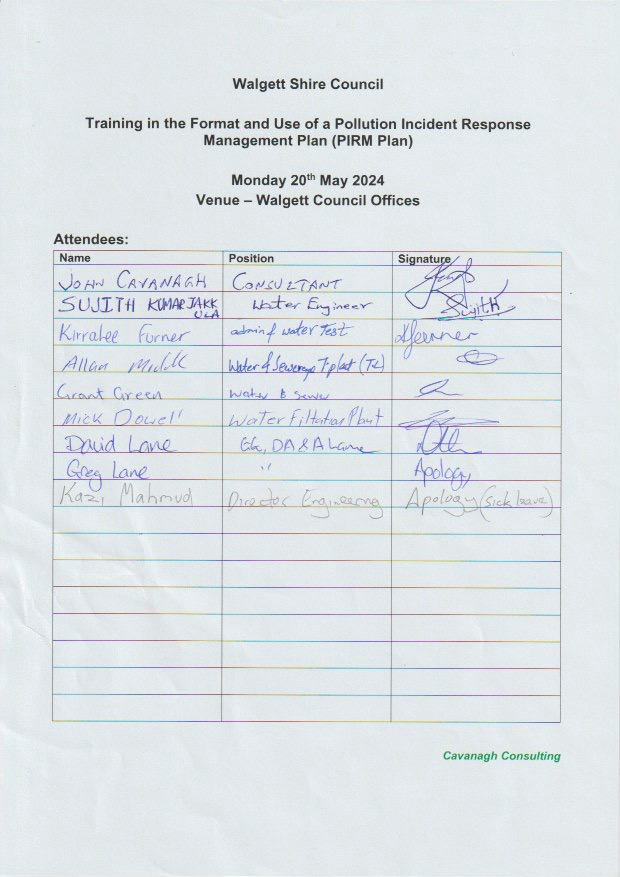
**Testing the Plan**

* Discussion on what constitutes a minor incident and what constitutes a major incident. How to respond to such incidents.
* Training obligations
* How to test and record the required response to a major pollution incident
* Desk top simulation exercises
* The role of the Regulator & EPA Investigations
* Post Incident Checklist

**3:00- 3.30 pm**

* **Review and Close**

# APPENDIX 17: PIRM PLAN TRAINING ATTENDEE LIST



# APPENDIX 18: PIRM PLAN TRAINING SIMULATION EXERCISES

|  |  |
| --- | --- |
| **POLLUTION INCIDENT RESPONSE MANAGEMENT Plan**  **SIMULATION Exercise # 1 Waste - Evaluation Form** | |
| **Location: Walgett** **Waste Facility** | |
|  | |
|  | |
|  | |
| **RESPONSE SEQUENCE:** | **TIME 2.00 pm**  **DATE 20th May 2024** |
| **Name and Position of those engaged in the simulation exercise** | **COMMENTS** |
| Sujith Jakkula – Water Engineer WSC  Kirralee Furner – Admin Officer  Grant Green – Water & Sewer  Allan Middleton – Water & Sewer  Mick Dowell – Water Plant Operator  David Lane – Waste Contractor |  |
| **Scenario # 1**   * You are working at the Walgett Landfill and it is Friday afternoon and you’ve returned to the Landfill to reopen it after lunch (had to slip down town to run an errand). * Upon arrival you see a 20 litre drum dumped outside the gate. * It is on its side and has started leaking what appears to be engine oil. * A member of the public arrives behind you to drop off some rubbish and notices the spill. * What do you do? |  |
| Assessment of significance | Minor |
| Initiation of PIRM PLAN. Incident response/notification of incident (all “relevant” agencies) | Refer to PIRM PLAN Who initiates plan? What are the roles and responsibilities?  Who is the responsible person ? Attends the site and liaises with on-site contractor & makes phone calls to relevant agencies. |
| Evacuation alarm sounded (if necessary) | Not necessary |
| Incident control/remediation action commenced –   * SOP 20 – Chemical or Oil Spill * Neighbour notification ? (only adjacent) * Landfill kept closed * Web update * Media release | Refer to PIRM Plan -  Check SOP  How are neighbours notified? Who does it? What are the messages? Minor incident so not required.  Advise customer they’ll need to wait until the site is clear or better still return in an hour  Refer to Communications Recipients Schedule – not required  Who is authorised to issue media statements - not required |
| Evacuation commenced (if necessary) | Barricade area |
| Warden checks for personnel present | Not necessary |
| Evacuation completed (if necessary) | Not necessary |
| Pollution contained -   * Report situation to EPA * Report situation to main office | Firstly stand drum up to prevent further leakage  Form an earth bund around spill  Who reports and what is reported  Who provides update to EPA and other agencies  Neighbours - phone and give update  Not necessary as spill is contained |
| Clean up commenced   * Drums secured in a container * Plant operator load away container and contaminated sand to disposal cell | Obtain spill kit from shed  Mop up excess oil |
| Clean up completed   * Report back to EPA and main office. | Reopen the site |
| Pollution Incident Report Form completed | DES prepares a written report and submits it to the EPA in accordance with EPL condition  Post incident review to be undertaken within one week of the incident |
| Simulation exercise concluded at (TIME) | 2:20pm |
| **COMMENTS** | |
| 1. Compliance with PIRM PLAN, including Standard Operating Procedures (identify areas that need to be addressed and list them) | |
| 1. Assessment of employee/contractor competency (identify improvements that need to be made and list them) | |
| 1. Time frames for response – (were they timely?) NA as theory only desktop simulation | |
| 1. General Comments/Recommendations for action, including changes to the PIRM Plan  * PIRM PLAN to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise (Appendix 1 – distribution) * Ensure spill kit is replenished * Updated PIRM PLAN to be issued and old copies destroyed | |
| **SIGNED (by assessor)**    **Date 24th May 2024** | |

|  |  |
| --- | --- |
| **POLLUTION INCIDENT RESPONSE MANAGEMENT Plan**  **SIMULATION Exercise # 2 STP - Evaluation Form** | |
| **Facility: Walgett** **Sewage Treatment Plant (and system)** | |
|  | |
|  | |
|  | |
| **RESPONSE SEQUENCE:** | **TIME 2.30 pm**  **DATE 20th May 2024** |
| **Name and Position of those engaged in the simulation exercise** | **COMMENTS** |
| Sujith Jakkula – Water Engineer WSC  Kirralee Furner – Admin Officer  Grant Green – Water & Sewer  Allan Middleton – Water & Sewer  Mick Dowell – Water Plant Operator  David Lane – Waste Contractor |  |
| Scenario # 2   * You are checking on the pump stations after a recent heavy storm event. * You check the station near the Sporting Club. * The pump station is overflowing with raw sewage and there’s no one in sight. * The river is not far away and is flowing so there is a risk of pollution. * You are the only person on duty. What do you do? | Can it get to the river ? No as a levee bank is in place. |
| Assessment of significance | Minor (unless it escapes) |
| Initiation of PIRM Plan. Incident response/notification of incident (all “relevant” agencies) | Refer to PIRM Plan Who initiates plan? What are the roles and responsibilities?  Who is the responsible person ? Initiates Plan, makes phone calls to W&S staff. Who relevant agencies ? |
| Evacuation alarm sounded (if necessary) | Not necessary |
| Incident control/remediation action commenced –   * SOP – sewage spill, hire pump truck, inform electricians * SOP – water sampling * Neighbour notification * Web update * Media release | Refer to PIRM Plan -  Are neighbours notified? If so who does it? What are the messages?  Refer to Communications Recipients Schedule  Are any neighbours affected ?  Who updates the web? Address this Monday morning as sewage was contained in the excavation  Who is authorised to issue media statements. Prepare media release Monday morning |
| Evacuation commenced (if necessary) | Not necessary |
| Warden checks for personnel present | Not necessary |
| Evacuation completed (if necessary) | Not necessary |
| Pollution contained -   * Report situation to EPA * Update communications on web. Advise affected neighbouring property owners/occupants * Water samples collected from downstream stormwater system ? | Who reports and what is reported  Who provides update to EPA and other agencies  Neighbours - phone and give update  Not required |
| Clean up commenced | W&S crew arrange pump truck to empty the excavation and make repairs to the pumps |
| Clean up completed   * Analysis received * Report back to EPA and Ministry of Health. | Not required |
| Pollution Incident Report Form completed | Not required  Post incident review to be undertaken within one week of the incident |
| Simulation exercise concluded at (TIME) | 2:50pm |
| **COMMENTS** | |
| 1. Compliance with PIRM PLAN, including Standard Operating Procedures (identify areas that need to be addressed and list them) | |
| 1. Assessment of employee/contractor competency (identify improvements that need to be made and list them)  * Training of contractor and contractors staff required in knowledge of SOPs | |
| 1. Time frames for response – (were they timely?)  * NA as theory only simulation | |
| 1. General Comments/Recommendations for action, including changes to the PIRM Plan  * PIRM Plan to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise * Contacts list to be updated * Updated PIRM Plan to be issued and old copies destroyed | |
| **SIGNED (by assessor)**    **Date 24th May 2024** | |

|  |  |
| --- | --- |
| **POLLUTION INCIDENT RESPONSE MANAGEMENT Plan**  **SIMULATION Exercise # 3 Pool - Evaluation Form** | |
| **Location: Walgett Swimming Pool (and system)** | |
|  | |
|  | |
|  | |
| **RESPONSE SEQUENCE:** | **TIME 2.50 pm**  **DATE 20th May 2024** |
| **Name and Position of those engaged in the simulation exercise** | **COMMENTS** |
| Sujith Jakkula – Water Engineer WSC  Kirralee Furner – Admin Officer  Grant Green – Water & Sewer  Allan Middleton – Water & Sewer  Mick Dowell – Water Plant Operator  David Lane – Waste Contractor |  |
| **Scenario # 3**   * You are at the Pool to do some general maintenance and go to the store room to get some fuel for the mower. * As you open the door you smell petrol and find a drum has been leaking and there’s about 10 litres on the floor. * It’s a very hot day and there’s a very high fire danger. * You are the only person on duty. * What do you do? | High risk of fire due to the extreme weather conditions  Small volume so staff can contain it |
| Assessment of significance | Minor (unless it ignites) |
| Initiation of PIRM Plan. Incident response/notification of incident (all “relevant” agencies) | Refer to PIRM Plan Who initiates plan? What are the roles and responsibilities?  Who is the responsible person, makes phone calls to W&S staff. Who relevant agencies ? |
| Evacuation alarm sounded (if necessary) | Not necessary |
| Incident control/remediation action commenced –   * SOP 8 & 9 – Chemical or Oil Spill * Neighbour notification * Web update * Media release | Refer to PIRM Plan -  Are neighbours notified? If so who does it? What are the messages - Not required  Refer to Communications Recipients Schedule  Are any neighbours affected ? No  Who updates the web? Not required  Who is authorised to issue media statements ? Not required |
| Evacuation commenced (if necessary) | Not necessary |
| Warden checks for personnel present | Not necessary |
| Evacuation completed (if necessary) | Not necessary |
| Pollution contained within the shed -   * Report situation to EPA * Report situation to main office | Who reports and what is reported  Who provides update to EPA and other agencies |
| Clean up commenced | Remove all sources of ignition from within the shed including mobile phones  W&S crew rectify the container and place it into a sealed container  Obtain spill kit and mop up liquid  Take container and kitty litter to Landfill for disposal on back of vehicle and take fire extinguisher in the vent of an emergency |
| Clean up completed   * Report back to EPA and main office. |  |
| Pollution Incident Report Form completed | Not required  Post incident review to be undertaken within one week of the incident |
| Simulation exercise concluded at (TIME) | 3:15pm |
| **COMMENTS** | |
| 1. Compliance with PIRM Plan, including Standard Operating Procedures (identify areas that need to be addressed and list them) | |
| 1. Assessment of employee/contractor competency (identify improvements that need to be made and list them)  * Training of contractor and contractors staff required or develop a new SOP ? | |
| 1. Time frames for response – (were they timely?)  * NA as theory only simulation | |
| 1. General Comments/Recommendations for action, including changes to the PIRM Plan  * PIRM Plan to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise * Contacts list to be updated * Spill kit to be replenished * Fuel containers to be stored in cupboard * Updated PIRM Plan to be issued and old copies destroyed | |
| **SIGNED (by assessor)**  **A signature of a triangle  Description automatically generated**  **Date 24th May 2024** | |