



Coonamble Shire Council

Pollution Incident Response Management Plan - July 2021

Coonamble Sewage Treatment Plant

Document Control

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Contents

1. Background	1
1.1 Sewage Treatment Plant.....	1
1.2 PIRMP Purpose.....	1
2. Pollution Incident Response Planning.....	1
2.1 Risk Assessment	1
2.2 Potential Pollutants and Safety Equipment.....	3
2.3 Maps.....	3
2.4 Notifiable Incidents.....	3
2.4.1 POEO Act Definitions.....	3
3. Incident Response	5
3.1 Immediate Notification Incident.....	5
3.1.1 Incident Response & Notification	5
3.1.2 Responsibilities	7
3.2 General Incident.....	8
3.2.1 Sewer Operations.....	8
4. Training & Review	10
4.1 Training & Review	10
4.2 PIRMP Review	10

Table Index

Table 1 Hazards	2
Table 2 Inventory of Pollutants and Safety Equipment	3
Table 3 Incident Contact details - Council	7
Table 4 Incident Contact Details – External	7
Table 5 Incident Response Training	10

Figure Index

Figure 3.1.1 Incident Response Flowchart	6
Figure 3.2.1 Incident Response Flowchart – Sewer Choke	9

Appendices

Appendix A Maps	11
Appendix B Risk Minimizing Procedures	14

1. Background

1.1 Sewage Treatment Plant

Coonamble Shire Council (Council) operates the Coonamble Sewage Treatment Plant (STP). Wastewater from the town is conveyed through the sewerage reticulation system to the STP located to the north of the town (at the end of Wingedee Street). The STP is a trickling filter plant with oxidation ponds. The STP effluent is stored in a large storage dam throughout the year and reused at the Coonamble Golf Club and the Coonamble Jockey Club.

The STP operates under EPL 4085 which is issued under Section 55 of the *Protection of the Environment Act 1997* by the NSW Environment Protection Authority (EPA).

1.2 PIRMP Purpose

The EPL contains requirements to report pollution incidents as outlined in Section 6, R2 (Notification of Environmental Harm):

The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

The introduction of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) in February 2012 requires that holders of EPLs maintain a Pollution Incident Response Management Plan (PIRMP).

2. Pollution Incident Response Planning

2.1 Risk Assessment

Risk assessments were conducted by Council and site personnel in September 2018. The main hazards identified through these assessments, along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks, are outlined in Table 1.

Table 1 Hazards

Location	Hazard	Control Measure/s	Consequence	Likelihood of material harm	Escalating Factors
STP	<ul style="list-style-type: none"> • Insufficient treatment • wet weather overflow 	<ul style="list-style-type: none"> • Use of effluent as irrigation • Adequate storage capacity at STP and Coonamble Racecourse and Golf Club 	<ul style="list-style-type: none"> • Pollution of downstream water body • Community contact with insufficiently treated sewerage 	Low	<ul style="list-style-type: none"> • Significant rainfall event • Flood event • Plant malfunction
Sewer reticulation network	<ul style="list-style-type: none"> • Sewer choke causes sewer reticulation overflow 	<ul style="list-style-type: none"> • Council Water and Sewer Staff on call 24hrs • Maintain equipment for sewage clean up and unblocking sewers. • Contact contractor for trucks for pump out 	<ul style="list-style-type: none"> • Localised soil contamination • Community contact with untreated sewage • Pollution of downstream water body 	Low	<ul style="list-style-type: none"> • Unauthorised material discharged to sewer network • Ageing pipeline network • Plant debris (roots) entering pipes.
Sewer Pump Station	<ul style="list-style-type: none"> • Pump station failure causes sewer overflow 	<ul style="list-style-type: none"> • Council Water and Sewer Staff on call 24hrs • Pump stations connected to telemetry • Standby pumps in high risk pump stations • Contact contractor for trucks for pump out 	<ul style="list-style-type: none"> • Localised soil contamination • Community contact with untreated sewage • Pollution of downstream water body. 	Moderate	<ul style="list-style-type: none"> • Unauthorised material discharged to sewer network. • Significant rainfall event.

2.2 Potential Pollutants and Safety Equipment

All fuels, oils and chemicals required for sewer operation are stored on site.

A range of safety equipment and alarms are maintained for use during emergencies.

Details of potential pollutants and safety equipment are provided in Table 2. The location of the items is shown on the maps in Appendix B.

Table 2 Inventory of Pollutants and Safety Equipment

Location	Potential Pollutant	Maximum Quantity	Safety Equipment & Devices	Storage	Alarms
STP	Sewage	ADWF 640kL/day (approx.)	General PPE General labouring tools Confined Spaces equipment Signage pH meter First aid kit	Water & Sewer staff Vehicles STP site shed	SCADA alarms – high level warning and pump failure
Sewer reticulation network	Sewage	Site specific	General PPE Disinfectant material	N/A	SCADA alarms – high level warning and pump failure.
STP	ULP	20 litres	Certified container	In bunker	N/A
STP	Herbicide	5 litres	Certified container	In bunker	N/A

2.3 Maps

Pollution incident response maps have been prepared to facilitate planning for incident response and provide readily accessible and accurate information to support the assessment of an incident and assist in the implementation of incident response procedures and clean-up.

The following maps are provided in Appendix A:

- Coonamble locality map
- STP features map

2.4 Notifiable Incidents

2.4.1 POEO Act Definitions

A pollution incident is defined by the Protection of the Environment Operations Act (1997) as:

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.

Material harm is defined by the POEO Act (1997) under Chapter 5, Part 5.7, Section 147 as:

(1) For the purposes of this Part:

(a) harm to the environment is material if:

- (i) It involves actual or potential harm to the health or safety of human beings or to the ecosystems that is not trivial, or
- (ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

(b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

3. Incident Response

3.1 Immediate Notification Incident

3.1.1 Incident Response & Notification

As per the definition of an immediate notification incident in Section 2.4.1 and resulting from the risk assessment in Table 1, Council have identified the following incidents related to their sewer operations that require immediate notification:

- Pump station, SCADA and backup failure resulting in an overflow from a pump station that reaches a nearby waterway
- Sewer choke resulting in an overflow that reaches a nearby waterway.

Council's procedures for responding to a potential immediate notification incident are outlined in Figure 1.

Contact details for Council personnel and external agencies requiring notification are provided in Table 3 and Table 4.

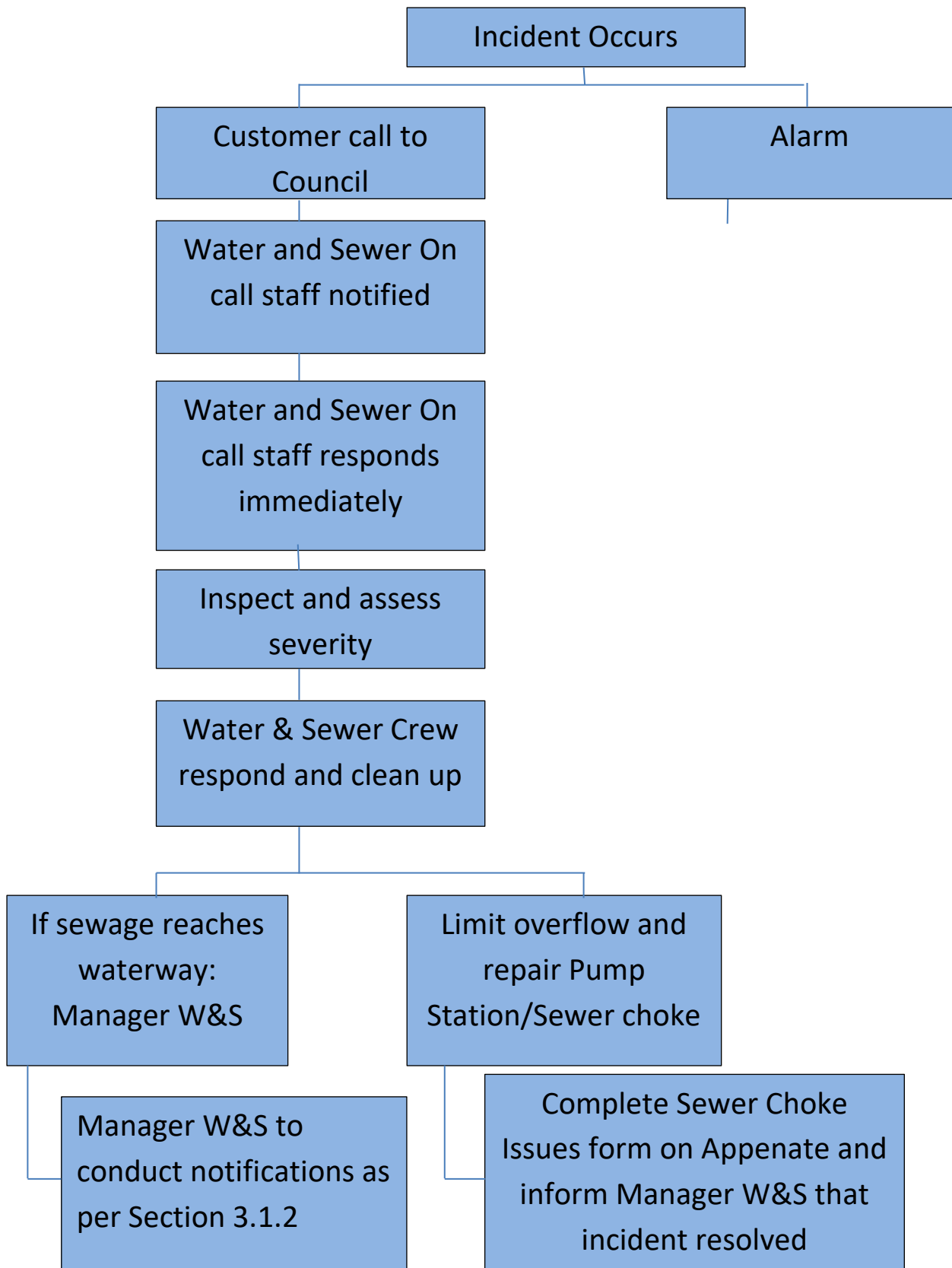


Figure 3.1.1 Incident Response Flowchart

Table 3 Incident Contact details - Council

Name	Role	Contact Number
Michael Jackson	Water & Sewer Services Supervisor	0428 217 420
Max Vozoff	Manager – Water & Sewer	0427 271 968
Kookie Atkins	Executive Leader – Infrastructure	0427 271 903
Hein Basson	General Manager	0488 371 908
Council Emergency Contact number (On Call number)		0428 217 420

Table 4 Incident Contact Details – External

Organisation	Contact Number
Emergency Services	000
EPA	131 555
Dubbo Regional Office	02 6883 5333
NSW Ministry of Health On Call Public Health Officer Dubbo regional Office	0418 866 397 02 6809 8963
WorkCover	131 050
NSW Rural Fire Service Coonamble Regional Office	02 6822 4203

3.1.2 Responsibilities

In the event of an immediate notification incident responsibilities for incident management are as follows:

- On Call Operator is responsible for actioning response to the incident, and informing Water and Sewer Operations Manager of the incident.
- Water and Sewer Operations Manager is responsible for notifying external authorities and ensuring adequate resources are available for incident response. They are also responsible for filling out Council’s internal environmental incident form.
- Executive Leader - Infrastructure is responsible for liaising with the media and notifying potentially affected community.
- The Water and Sewer Operations Manager shall determine the most appropriate means of contacting potentially affected community, including:
 - Door knocking
 - Letter box drop
 - Phone
 - Local media
 - Signage.

Information provided to the community would depend on the incident but could include:

- Description of the incident
- Status of incident
- Response actions

- Actions to minimise harm
- Likely duration.

As per Council's Environmental Protection License, the licensee must provide written details of the notification to the EPA within seven days of the date on which the incident occurred.

3.2 General Incident

3.2.1 Sewer Operations

Council maintain incident response procedures for other potential incidents throughout the sewer network including:

- Sewer choke (localised overflow not reaching waterway).
- Sewer pump faults that may lead to overflows.

The EPL requires details of the incidents be recorded and maintained by Council.

Where sewage or partially treated sewage is discharged from the premises as a result of a bypass of the sewage treatment plant, or an observed or reported overflow has occurred from the reticulation system, and overflow or a bypass may pose a risk to public health, the licensee is to promptly give appropriate notification to any parties that are likely to be affected, including:

- the potentially affected community
- NSW Health

When the licensee notifies NSW Health of a bypass or overflow incident the licensee must also notify the EPA. Notifications are to be given as soon as practicable after the licensee or one of the licensee's employees or agents becomes aware of the notifiable bypass event.

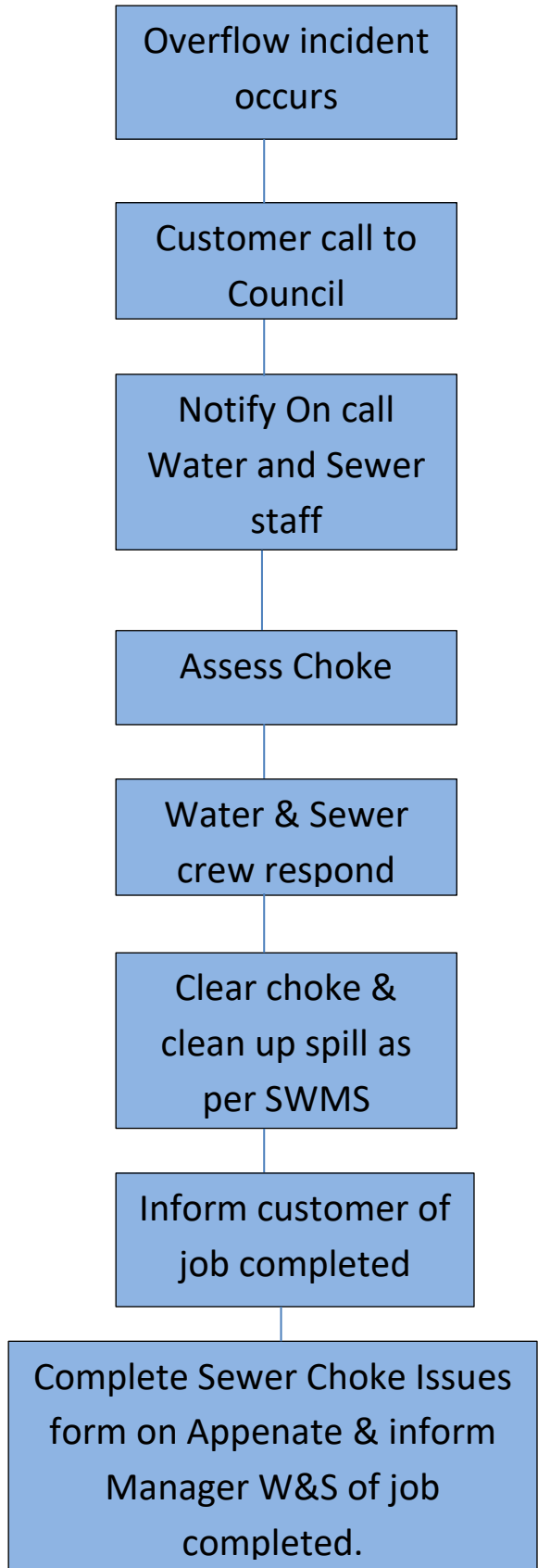


Figure 2 Incident Response Flowchart – Sewer Choke

4. Training & Review

4.1 Training & Review

Personnel involved in water and sewerage operations undertake a range of training to assist in the response to potential incidents and to test the adequacy of incident response procedures and plans. Details of the training and testing of the PIRMP is provided in Table 5.

Table 5 Incident Response Training

Type of Training	Personnel Involved	Frequency	Records
NSW Officer of Water Part 1 – Water Treatment Operations	Water and Sewer Operators	Once	Human Resources
NSW Officer of Water Part 2 – Advanced Treatment	Water and Sewer Operators	Once	Human Resources
Induction	New Staff	Once	Human Resources
Overflow Clean up	New Sewer Staff	On-the-Job	Nil
Confined Space	Water and Sewer Operators	Once with refresher every two years	Human Resources
Toolbox meetings	Water and Sewer Operators	Daily	Nil
Emergency simulation	Water and Sewer Operators	Annual	Minutes
Incident debrief	Personnel involved in incident Manager	Within one month of an incident	Minutes

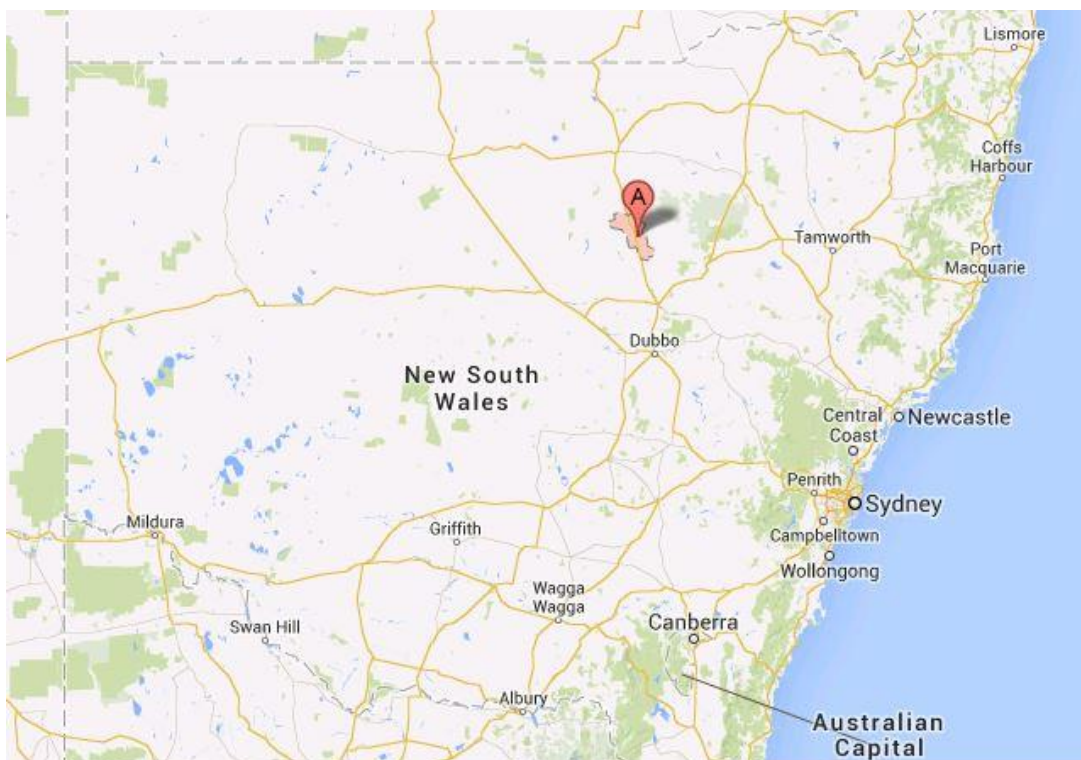
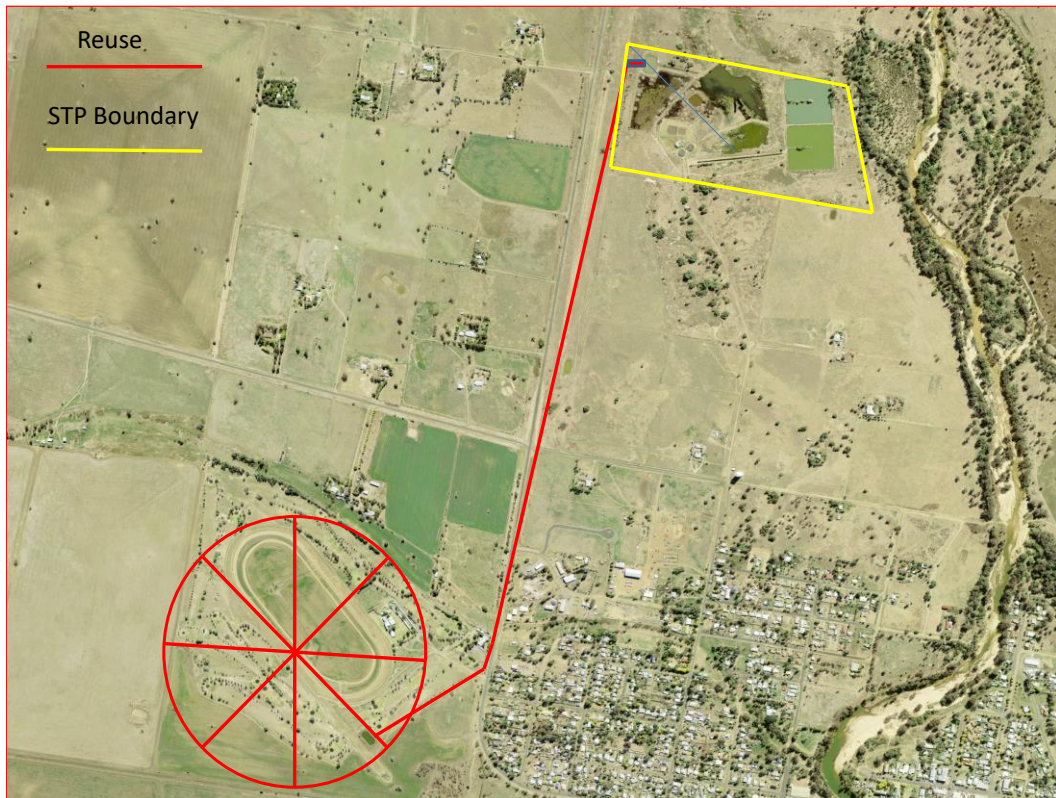
4.2 PIRMP Review

The PIRMP will be reviewed when there is a material change to operations including but not limited to:

- Modification of EPL 4085
- Changes in legislative requirements
- Recommendations arising from an incident debrief, emergency drill or emergency simulation exercise.

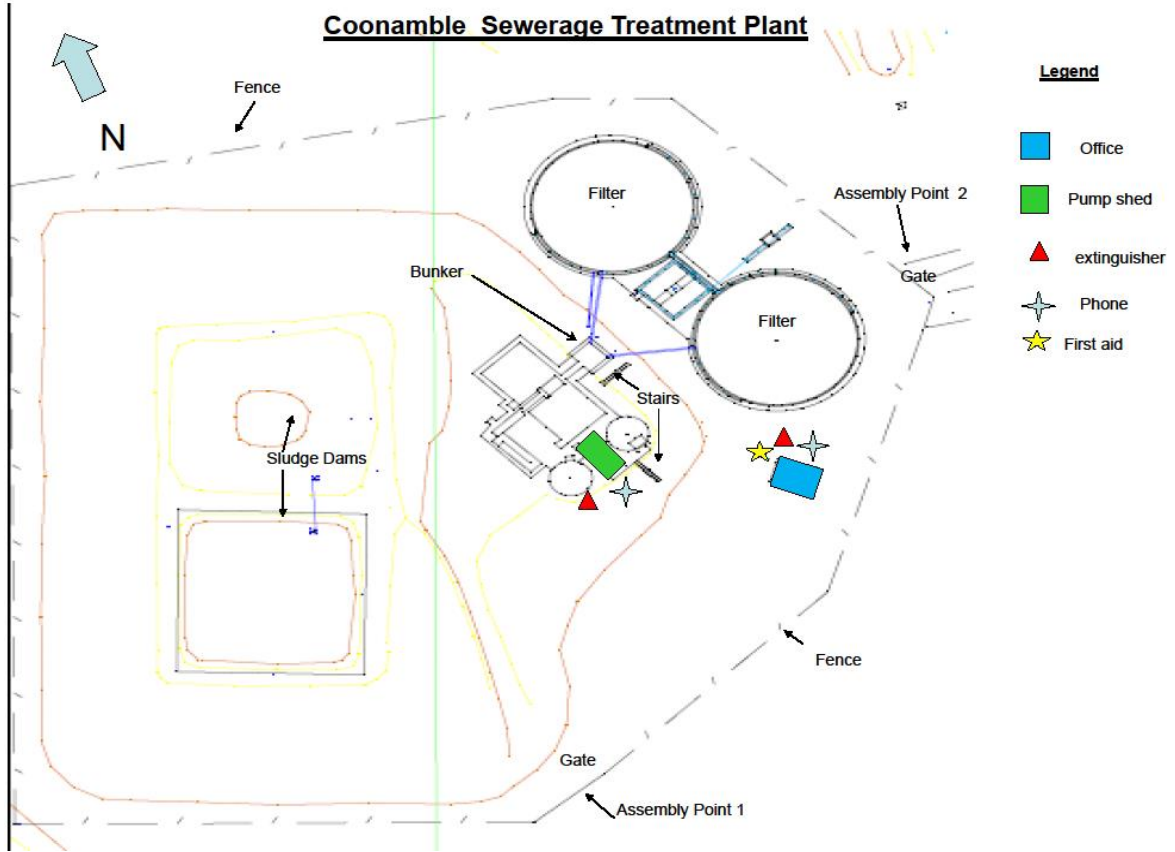
The responsibility for reviewing the PIRMP is the Water and Sewer Operations Manager. An update of the PIRMP would trigger all staff to undergo refresher training as part of team toolbox meetings as per Table 5.

Appendix A - Maps





Coonamble Sewerage Treatment Plant



Appendix B – Risk Minimising Procedures

Coonamble Shire Council maintains the following risk minimising procedures regarding operation of the Coonamble sewage system:

- Safe Work Method Statement 003 – Sewer Treatment Plant Operational Activities
- Safe Work Method Statement 004 – Sewer Reticulation Clearing Chokes
- Safe Work Method Statement 032 – Sewer Pump Station Maintenance and Repair
- WHS Management Plan
- Confined spaces procedures and forms.
- Risk Assessments