



Warrumbungle Shire Council

Pollution Incident Response Management Plan for the Dunedoo Sewerage Treatment System

EPA LICENCE NO. 1747

April 2014

(Revised October 2022)



For policy and technical information regarding this plan please contact:

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VERSION	ISSUE DATE	DESCRIPTION
1.0	April 2014	Final version
2.0	February 2015	Amendments
3.0	March 2020	Major review, updates and amendments (Jacinta Green)

Approval record

Version Number	Approved By (Signature)	Name and Title	Date
3.0			

PIRMP update details

Please note that the following updates have been made to this document.						
<i>Date updated</i>	<i>Version Number</i>	<i>Page/s</i>	<i>Reason for update</i>	<i>Description</i>	<i>Date updates loaded to website</i>	<i>Updated by</i>
February 2015	2.0	17		Attachment 5: Operational Procedure checklist		
March 2020	3.0		Major plan review	Updated format to follow latest guidelines. Inserted the following new sections as indicated by the latest guidelines. Updated contact details Updated chemical and safety equipment inventories.		Jacinta Green Jacintagreen.com.au

Testing record

It is a legal requirement to test the plan every 12 months and within 1 month of any pollution incident.

<i>Date Tested</i>	<i>Test type (Yearly/Post Incident)</i>	<i>Tested by</i>	<i>Details of Test</i>	<i>Findings of test</i>
18/04/2018	Yearly	Cornelia Wiebels	Reviewed the plan for updates. Tested the plan and ran a scenario.	Updates to plan identified
16 March 2020	Yearly	Jacinta Green	Desktop and Site Audit	Staff Training to be undertaken for all staff by end May
				Latest PIRMPs to be loaded to Website
				Need for onsite induction

				process and register for visitors have been discussed with WHS Officer.
				Drums in shed need labels – Treatment supervisor has been informed.
				Shed needs a clean out and organizing. Treatment supervisor has been informed

Next test due

March 2023

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1 Purpose of this plan.

Warrumbungle Shire Council holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Dunedoo Sewerage Treatment Works. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at Dunedoo Sewage Treatment System Plant and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

The plan is also available for download from www.warrumbungle.nsw.gov.au

This plan has been developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.

This plan is intended to inform field staff and provides a concise summary of the requirements for responding to and reporting potential and actual pollution incidents in the Dunedoo Sewerage Treatment System including the Sewage Treatment Plant, Pump Station and Reticulation Pipework.

Council will provide regular training to ensure staff are familiar with how to respond to pollution incidents. Management staff are to refer to the Pollution Incident Response Management Plan Supporting Statement for further detail in relation to Pollution Incidents.

2 Environment Protection Licence (EPL) Details

Name of licensee	Warrumbungle Shire Council
ABN	63 348 671 239
EPL number	1747
Premises name and address	Dunedoo Sewerage Treatment Works 92 Golden Highway, Dunedoo NSW 2844
Contact	Leeanne Ryan Director Environment and Development Services Business Hours 02 6378 5000 After Hours 02 6849 2000 leeanne.ryan@warrumbungle.nsw.gov.au www.warrumbungle.nsw.gov.au
Scheduled activity/activities on EPL:	N/A
Fee based activity/activities on EPL:	Miscellaneous licensed discharge to waters (at any time) > 20-100 ML discharged

3 Pollution incident – Person/s responsible

Identify the person/s through whom all communications are to be made:

PIRMP activation	Site Supervisor Dunedoo Sewerage Treatment Works Business Hours 02 6849 2000 or 02 6378 5000
Notifying relevant authorities	Technical Officer - Warrumbungle Water Business Hours 02 6378 5000 or 02 6849 2000
Managing response to pollution incident	Site Supervisor, Supervisor Reticulation, Supervisor Treatment Plants Business Hours 02 6849 2000 or 02 6378 5000

4 Notification of relevant authorities

The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force). The site supervisor is to then contact the **Manager Warrumbungle Water, 02 6849 2000** who will then notify all other parties below including NSW Fire and Rescue via a local telephone number.

Emergency Hotline Number - Fire, Police, Ambulance (24 hours) 000

Fire and Rescue NSW

- Dunedoo Fire Brigade **02 6375 1501**

Environment Protection Authority (EPA)

- Emergency Hotline Number (24 hour) **131 555**
- Dubbo Regional Office **02 6883 533**

Health NSW

- Public Health Officer on Call (24 hours) **0418 866 397**
- Dubbo Regional Office **02 6809 8979**

Safe Work NSW

Hotline Number **13 10 50**

Warrumbungle Shire Council

- Warrumbungle Shire Council Environmental Services
(24 hour Emergency Hotline Number) **02 6849 2000**
- The Manager Warrumbungle Water will notify the Director of Environment and Development Services who will determine the need for further reporting to the General Manager and Council. Depending on the severity of the pollution event Council Management will determine if press releases and/or radio announcements are required.

5 Notification of neighbours and the local community

Develop any specific information that could be provided to the community, so it can minimise the risk of harm where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with Section 3.2.2.

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours.

Council would notify neighbours by making a telephone call to every neighbouring property of the STP as detailed in Attachment 1 below. If neighbours are unable to be contacted by telephone a door knock will be carried out.

If appropriate a media release will be issued for publication via radio and social media channels.

In the particular case of discharge into the Talbragar River, especially in times of low flow in the river, it may be decided to contact landowners and other parties that may be impacted. See Maps in Attachment 2.

6 Description and likelihood of hazards

DESCRIPTION OF INCIDENT	LIKELIHOOD	IMPACT	CONTRIBUTING FACTORS
Overflow in the reticulation system	Medium	High	Prolonged heavy rain, lack of maintenance, mechanical failure
Wet weather bypass at the STP	Low	High	Prolonged heavy rain, lack of maintenance, mechanical failure
Dry weather bypass at the STP	Low	High	Lack of maintenance, mechanical failure
Pond failure at Sewer Treatment Plant	Low	High	Lack of maintenance
Mechanical failure at the STP results in discharge of untreated effluent	Low	High	Lack of maintenance or fire damage
Unauthorised chemicals entering plant causing shutdown of process	Low	High	Criminal acts, leaking chemicals in urban area
Mechanical failure at the STP results in offensive odours	Low	Low	Lack of maintenance or fire damage
Inadequate chemical storage	Low	Medium	Human error, high winds could spread chemical fire
Pipeline breakage within Sewer Treatment Plant	Low	Low	Human error during excavation, poor maintenance

Exceed Environment Protection Licence discharge limits	Low	Medium	Prolonged periods of heavy rain or mechanical failure
Acts of vandalism or target of terrorist activity	Low	Medium	Increased risk when plant not attended. Increased risk of fire in hot dry weather

7 Pre-emptive actions to be taken and minimising harm to persons on the premises

It is a requirement of the legislation that all steps be taken to minimise the risk of pollution incidents. All staff must ensure that work is carried out in a safe manner in accordance with the WHS legislation and Council's safe work procedures.

All on site chemicals will be safely stored, and where necessary, in a **bunded** area.

All safety equipment including personnel protective equipment, fire extinguishers, hazmat kits etc are to be kept up to date and ready for any emergency.

All staff are, to ensure that any observed maintenance issues are reported to their supervisor for action.

It is management's responsibility to ensure all staff are fully trained in safety procedures and emergency responses including this Pollution Incident Response Management Plan. Training in relation to this Plan will be registered in the Training Register-Attachment 2.

Any persons entering the site must be wearing the appropriate PPE and inducted by a trained staff member.

Signage should be installed where appropriate.

8 Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum early warnings, updates and actions to be taken during and after an incident

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

9 Staff training

An online training course has been developed to test relevant staff knowledge of the Pollution Incident Response Management Plan (PIRMP).

Relevant staff are required to complete the training course at **least once a year**. Completion of the training course by relevant staff is checked annually as part of the PIRMP testing procedures.

Access to the training course is through the council's on-line training program managed by the Human Resources Department of Warrumbungle Shire Council.

The objectives of the training program are to:

- Ensure staff are aware of whether a pollution event is considered minor or major.
- Ensure that staff know who to call when a pollution event occurs.
- Ensure Warrumbungle Shire Council meets its regulatory obligations
- Ensure chances of pollution events impacting human health or the environment are minimised.

ATTACHMENTS

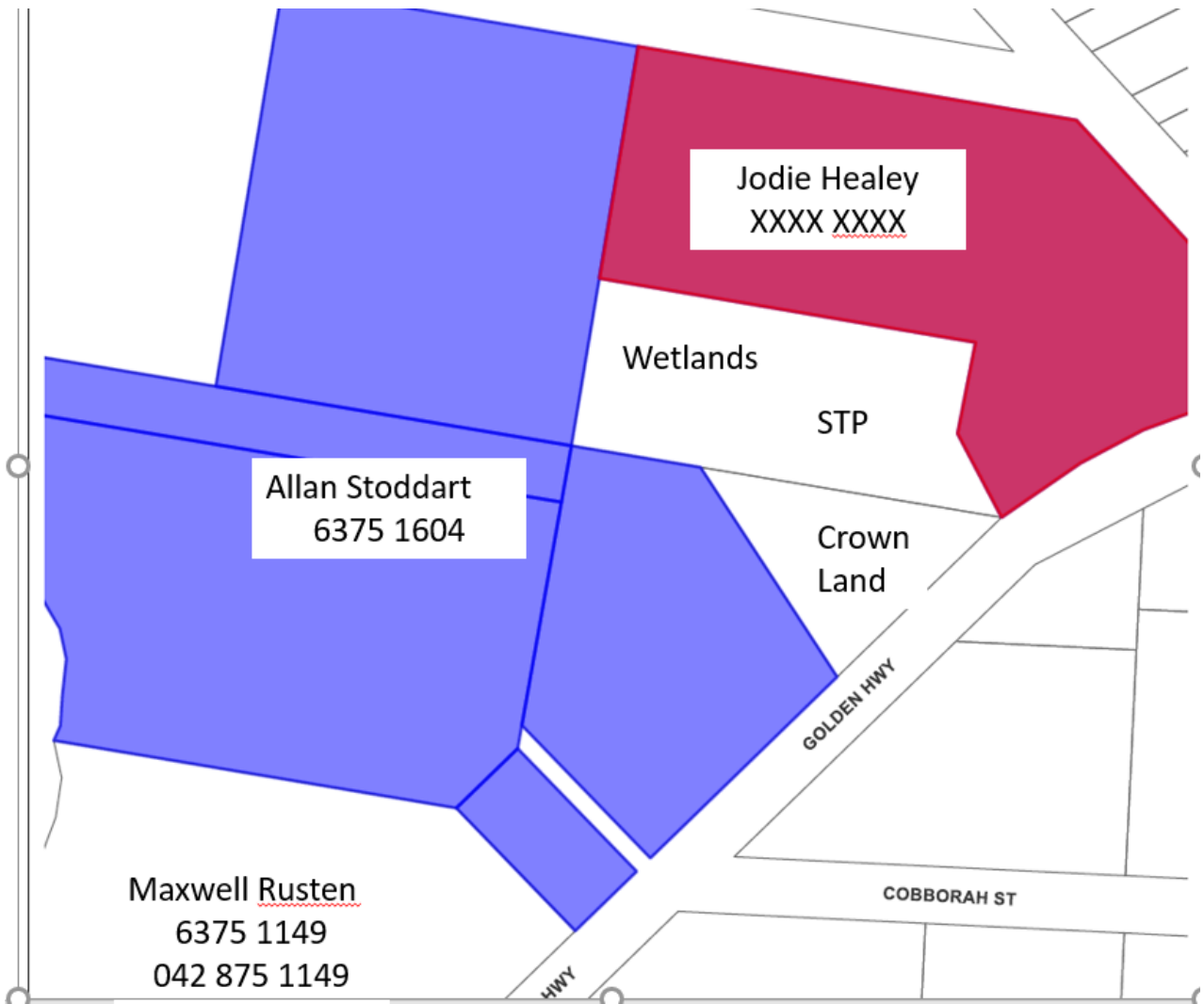
10 Attachment 1 – List of STP Neighbours to be Notified

Contact Name	Comments	
All affected neighbours	See below	Door knock if necessary
Landowners fronting Talbragar River	Media releases via radio and print media	Only in case of pollution of Talbragar River

Contact Name	Property Address	Contact Ph.	Comments
Allan Leigh Stoddart	120, 122 Golden Highway, Dunedoo	02 6375 1604	
Maxwell Herbert Rusten	Riverside' 138 Golden Highway, Dunedoo	02 6375 1149 0428 751 149	
Jodie Therese Healey	79 Castlereagh Highway, Dunedoo		TBA
**The Manager Altomonte Nominees P/L	Corumbene 485 Castlereagh Highway, Dunedoo	0428 115 528	Non-resident owner

ATTACHMENT 2 - Maps of the Dunedoo Sewerage System





ATTACHMENT 3 - Information to be notified

Under section 150 of the POEO Act 1997, the information about a pollution incident that must be notified to relevant authorities is:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred, including the cause of the incident, if known;
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Other information prescribed by the regulations.

The Water Manager is to immediately provide the information initially by phone and later by filling out the "Pollution Incident Reporting Form" in Attachment 1 of this plan.

Any information required that is not known at the time the incident is notified must be provided when it becomes known.

Pollution Incident Reporting form

INCIDENT No:

TIME:

DATE:

DURATION OF INCIDENT:

NATURE OF INCIDENT:

WEATHER CONDITIONS:

THE LOCATION OF THE PLACE WHERE POLLUTION IS OCCURRING OR IS LIKELY TO OCCUR:

THE NATURE, THE ESTIMATED QUANTITY OR VOLUME AND THE CONCENTRATION OF ANY POLLUTANTS INVOLVED (IF KNOWN):

THE CIRCUMSTANCES IN WHICH THE INCIDENT OCCURRED, INCLUDING THE CAUSE OF THE INCIDENT (IF KNOWN):

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THE CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION (IF KNOWN):		
<hr style="border-top: 1px dashed black;"/> <hr style="border-top: 1px dashed black;"/> <hr style="border-top: 1px dashed black;"/>		
HAS EPA DIRECTED COUNCIL TO NOTIFY NEIGHBOURS?	YES	NO
IF NOT, HAS COUNCIL VOLUNTARILY NOTIFIED NEIGHBOURS?	YES	NO

Signature: Site Supervisor, Warrumbungle Shire Council	Date:
 Signature: Manager, Warrumbungle Water Warrumbungle Shire Council	Date:
Has Council Been Notified? Yes No	
Has Environment Protection Authority (EPA) Been Notified? Yes No	
Has NSW Ministry of Health (via Public Health Units) Been Notified? Yes No	
Has WorkCover NSW Been Notified? Yes No	
Has Local Fire and Rescue NSW Been Notified? Yes No	

ATTACHMENT 4 – Staff training Register

Staff Training Register		
Date	Staff Member	Brief Description of Training Task
March 2021	Cornelia Wiebels	Explained PIRMP and requested feedback.
	Andrew Milford	Explained PIRMP and requested feedback.
	Dean Lewin	Explained PIRMP and requested feedback.
	Karyna Hawkes	Explained PIRMP and requested feedback.
	Kelly Williams	Explained PIRMP and requested feedback.
	Cornelia Wiebels	<p>Reviewed the plan for updates. Tested the plan and ran a scenario.</p> <p>Staff attending Kelly Williams, Andrew Milford, Dean Lewin, Karyna Hawkes Matthew Gilbert</p>

ATTACHMENT 5 - Operational Procedure

DUNEDOO SEWERAGE TREATMENT PLANT OPERATIONAL PROCEDURES	
A DAILY PROCEDURE	
Prior to any work have a current risk assessment completed and check controls for hazards, PPE, procedures etc.	
	<i>Details</i>
i) Start up	<ul style="list-style-type: none"> • Record pump readings • Hose down walls at Nott Street pump station
ii) Take readings	<ul style="list-style-type: none"> • Sludge volume index, rainfall, mixed liquor suspended solids, temperature,
iii) Cleaning and Maintenance	<ul style="list-style-type: none"> • Clean the screen • Hose down walls • Grease beaters • Drop sludge automatically

Attachment 6 - Definition of Pollution Incidents

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

Harm to the environment is material if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, and

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.

Pollution incident classifications required responses and notifications protocol

Pollution incidents that may occur within the Dunedoo Sewerage System can be categorised into two major areas in determining the type of response and notification requirements. If there is any doubt as to the level of notification required it is always best to err on the side of caution and immediately notify all authorities as well as any affected residents.

It is the responsibility of the person on site to first call 000 in dangerous situations requiring immediate emergency services assistance, advise other staff and members of the public in immediate danger (by carrying out a door knock and/or telephoning) and if safe to do so take immediate steps to reduce the impact of the incident. When able, the person on site is to notify the Manager Warrumbungle Water as soon as possible who will immediately notify the relevant authorities and relevant Council managers.

When attending to pollution incidents it is important to assess the tasks required and ensure that work is carried out in a safe manner in accordance with the WHS legislation and Council's safe work procedures. The Pollution Incident Decision Flow Chart in Section 4 of this document summarises the response to an actual or potential pollution incident.

3.1 Minor – No Notification Required

The type of incident requiring no notification to external authorities is one that is of no danger to human health and no impact on the environment.

Typical examples include :-

- Sewer choke causing surcharge affecting a single domestic premise that can be easily cleaned up by Council (fill out Sewer Choke report after incident is cleaned up)
- Small, local spill of sewage or chemical within the Sewage Treatment Plant that is easily cleaned up by Council Staff.
- Offensive odours discharged from the STP or a pump station

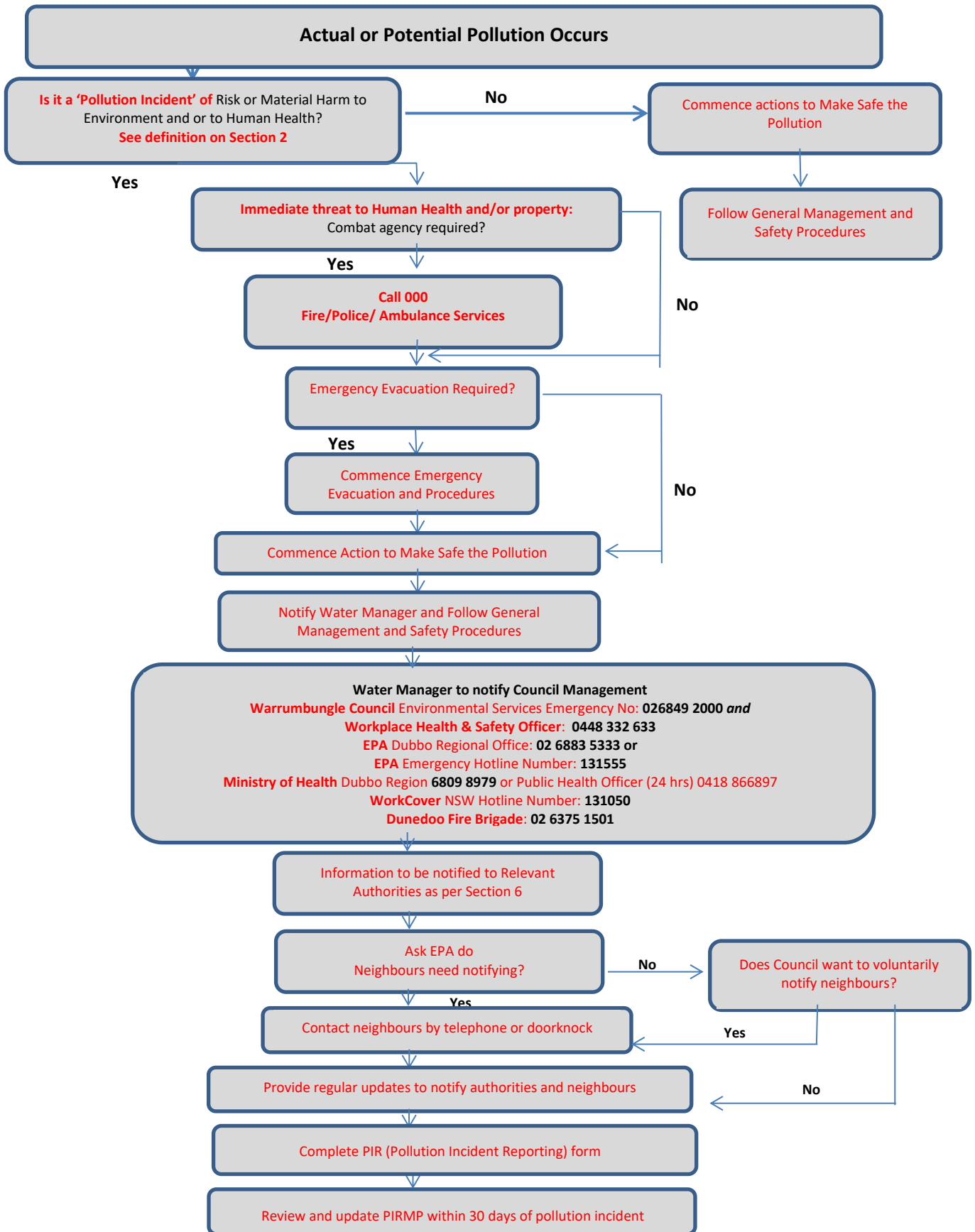
3.2 Major – Notify EPA, Dubbo Public Health Unit, Workcover and Dunedoo Fire Brigade, Council Management

The type of incident classified as Major typically has the potential to or causes actual harm to humans and/or the environment.

Typical examples include :-

- Sewer Choke affecting more than one residence.
- Minor overflow in the reticulation system that is easily contained and can be readily isolated from the public.
- Overflow from the reticulation system into the Talbragar River during a wet weather event.
- Sewage overflows in or near a school, public park, aged care facility or hospital where humans may be impacted.
- Sewage overflows during dry weather that enters the storm water system and could discharge into the Talbragar River.
- Pump Station overflow.
- Sewage Treatment Plant bypass or mechanical failure event that results in discharge of untreated or partially treated sewage from the STP site.
- Fire or Chemical spill requiring Emergency Services Assistance.
- Dangerous trade waste discharges (e.g. petrol from a Service Station)
- Vandalism that has or could have caused a pollution incident.

Attachment 7 - Pollution incident decision flow chart



Attachment 8 - Inventory of pollutants

To be updated as part of site audit

Chemicals	Present (?)	Quantity	Storage	Signage	Other /Comments
Calcium hydroxide - Ca(OH) ₂ (Hydrated Lime)	Yes	1 x 25 Kg Bag	Storage Shed	No	Not used on site – inventory for sewer chokes
Hydrochloric Acid	Yes	Empty drum	Storage Shed		Shed needs to be cleaned and organised. Treatment Supervisor has been informed
Gearbox Oil		40 Litres	Storage Shed		

Attachment 9 - Safety equipment

To be updated as part of site audit

Equipment	Present	QTY	Location	Condition/Comments
Long gloves	No			Disposable gloves are present
Fire extinguisher	Yes			
Breathing Apparatus	n/a			
Safety eye wear			In truck	
Gumboots			In truck	
Masks	No			
Safety showers/Eyewash	Yes		Eyewash located outside site office	Standard shower available
PIRMP on site	Yes		Site Office	