

Pollution Incident Response Management Plan



**COOTAMUNDRA -
GUNDAGAI REGIONAL
COUNCIL**

Cootamundra Gundagai Regional Council
255 Sheridan Street
Gundagai
NSW 2722

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About this release

Document Number: 1.3
Title: Pollution Incident Response Management Plan
Author: Cootamundra Gundagai Regional Council

Ed 1 / Rev 6	10 May 2023	Annual Revision of CGRC PIRMP.	Manager of Engineering Services
Ed 1 / Rev 5	10 May 2022	CGRC Revision of Document.	Manager of Technical Services
Ed 1 / Rev 4	20 June 2016	Annual Revision	Director of Asset Management
Ed 1 / Rev 3	14 June 2014	Final Plan	Director of Engineering Services
Ed 1 / Rev 1	19 October 2012	Revision	Director of Engineering Services
Ed 1 / Rev 0	18 October 2012	Draft Plan	Director of Engineering Services
Issue	Date	Revision Description	Authorised by

Management Endorsement of Pollution Incident

Response Management Plan



Manager of Engineering – Gundagai

10/05/2023

Date

Cootamundra Gundagai Regional Council Pollution Incident Response Management Plan Gundagai Sewer Treatment Plant

Pollution Incident Response Management Plan

1 Purpose & Scope

This Pollution Incident Response Management Plan (PIRMP) has been developed to describe Cootamundra Gundagai Regional Councils response to a potential pollution incident and to meet the requirements of the Protection of the Environment Operations Act (POEO Act 1997)

The plan covers description of potential hazards, actions to be taken to prevent additional environmental harm and details of communication required in the event of an incident. The plan is based on a risk assessment.

2 Process

In the event of a pollution incident:

Step 1: Emergency Response: Ensure personnel are safe.

Step 2: Emergency Response: Contain the incident where possible.

Step 3: Notify the Water & Sewer Supervisor.

Step 4: Water & Sewer Supervisor to complete the notification required in section 2.6.2 if the pollution incident meets the definition in section 2.1.

The remainder of this document is set out to meet the requirements of the legislation. Each of the sections below is titled to match the *Preparation of pollution incident response management plans* document issued by the EPA.

2.1 Definition of Pollution Incident

A *pollution incident* means 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.

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:

(i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

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(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.

2.2 Potential Incidents

Sewage overflow, raw or partially treated, pose a potential threat to the environment. They could be caused by:

- Storms (lightning/heavy rainfall/wind) causing power failure or damage to infrastructure
- Reticulation blockages
- Damage to reticulation (contractors or other damage during excavations etc.)
- Infrastructure failure due to age
- Excessive flows
- Power outage
- Treatment plant blockage
- Flood.

2.3 Pre-emptive actions to be taken

First priority for pre-emptive measures is to eliminate substances that can become potential pollutants. If this is not possible, physical barriers should be installed to prevent pollutants from entering the environment such as bunding and spill drainage containment.

Plant and equipment are available to create additional bunding in the event of significant sediment runoff using material available on site. Any material used for bunding will be assessed in accordance with the Waste Classification Guideline for appropriate disposal.

Cootamundra Gundagai Regional Council also undertakes regular maintenance of its system.

The following is a list of measures undertaken by Council staff and contractors

- Daily checks of waste treatment plant and pumping stations.
- Tree removal where there are repeated chokes
- CCTV and Jetting for repeated chokes
- Cleaning and maintenance of pumps.

2.4 Inventory of Pollutants

There are no significant sources of pollutants maintained on site. A small amount of fuel for the pressure washer is located on site.

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2.5 Safety Equipment

Staff are issued with the following safety equipment

- Rubber Gloves
- Disposable Overalls
- Gas Monitoring and calibration kits
- Safety glasses
- Gumboots
- Work boots
- Sun screen
- Straw hat
- Hard hat
- Confined spaces safety harness.

2.6 Pollution Incident

During a pollution incident which involves actual or potential harm to health or safety of human beings or to ecosystems that are not trivial, the Director, or Parks & Gardens Overseer must be notified immediately. The following agencies must be contacted immediately by either the Director or Parks & Gardens Overseer in the following order. When notifying these agencies use form *Environmental Incident Report Form* located in **Appendix 2** to record agency notification.

Emergency Services (if dealing with an emergency)	Police Fire Ambulance	000
EPA	Environment Line	131555
NSW Health	Public Health Unit	02 60808900 (After hours the number is diverted to Albury Base Hospital. Ask for Public Health Officer On Call)
WorkCover		131050
Cootamundra Gundagai Regional Council	Council Office	1300 459 689
Fire and Rescue(if not an emergency)	General Enquires	133473

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2.6.1 Council Personnel responsible for the site

The following table outlines the council personnel responsible for the site.

The site is manned intermittently with a supervisor depending on requirements.

Title	Name	Contact Number
On Call Sewer Operator	James Attwood/Mark Nicholson	0418 241 934
Water & Sewer Supervisor	Geoffrey Moore	0419 980 498
Manager of Engineering Gundagai	Stephen Targett	0428 695 536
Council Office	Gundagai	1300 459 689

In all situations where there is damage and/or loss to private property or a member of the public is injured or becomes sick due to a pollution incident, contact Councils WHS and Risk Management Officer, on 0447 362 979.

2.6.2 Notification of external parties

The following table outlines the contact details and correct sequence for notification in the event of a notifiable pollution incident.

Emergency Services (if dealing with an emergency)	Police Fire Ambulance	000
EPA	Environment Line	131 555
WorkCover		131050
Cootamundra Gundagai Regional Council	Gundagai Office	1300 459 689
Fire and Rescue (if not an emergency)	General Enquires	133 473

Council will contact the Green Keeper at the Gundagai Golf Course, on 0439 789 226 if an incident has the potential to impact on the golf course.

2.7 Communicating with neighbours and local community

The site has signage indicating the contact details for community feedback.

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In the event of a notifiable incident neighbouring properties will be door knocked or phoned to advise of the situation.

The table bellows outlines the local medi9a outlets that will be contacted.

<u>Organisation</u>	<u>Phone</u>	<u>Fax</u>
Sounds of the Mountains Radio	6947 9100	6947 9963
ABC Local Radio	6923 4811	6923 4899
Gundagai Independent	6944 1027	6944 2222
Triple M/93.1 Star FM Radio	6921 1022	6921 7193
The Daily Advertiser	6938 3300	6921 6950

Contaminated land is to be disinfected, ponded sewage pumped out and faecal coliforms are to be monitored until background levels are reached.

The Sewage Treatment Plant is located on the river flats adjacent to the golf course. There are no other private land holders/ or residences adjourning the treatment plant (Appendix A. Map), other than the golf course. The inflow into the plant and the available storage means that the potential for an overflow affecting any neighbours is low. In the event of incident and overflow escaping containment areas or in times of flood, and the there is a potential for it to impact on the community, then the organisations listed above would be notified.

2.8 Minimizing harm to persons on the premises

Refer to the emergency response plan for the site. At all times minimising harm to persons shall be a priority.

2.9 Training, Testing and Review.

There is a very low risk of a pollution incident occurring. Council will review the PIRP after 12 months and create a new version at 24 months. Testing the plan will be carried out at the time of review.

All staff will be trained in the PIMRP and records maintained in the corporate training system.

A copy of this plan will be uploaded to the Council website and kept within the site folder.

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Appendix A Map



Appendix B Environmental Incident Report Form

The following form must be filled out when reporting a pollution incident as outlined in Section 2.6, Pollution Incident

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PART A

Report to Environmental Incident Hotline LOCATION OF INCIDENT

PLACE YOUR
COUNCIL LOGO
HERE

Recent changes to Part 5.7 of the *Protection of the Environment Operations Act 1997* (POEO Act) specify new requirements relating to the notification of pollution incidents. For more information see www.environment.nsw.gov.au/pollution/notificationprotocol.htm

<input type="checkbox"/> Project	<input type="checkbox"/> Facility	<input type="checkbox"/> Activity	<input type="checkbox"/> Location/Name:	<input type="text"/>
STREET NUMBER		STREET NAME		
<input type="text"/>		<input type="text"/>		
SUBURB		NEAREST CROSS STREET		
<input type="text"/>		<input type="text"/>		
WHERE DID THE INCIDENT OCCUR				
<input type="text"/>				
SECTION/UNIT RESPONSIBLE FOR THE SITE				
<input type="text"/>				

<input type="checkbox"/> Sewage	<input type="checkbox"/> break in mains	<input type="checkbox"/> blockage
<input type="checkbox"/> pumping station (sewage or chemical)	<input type="checkbox"/> mechanical failure	
<input type="checkbox"/> sewage treatment plant	<input type="checkbox"/> electrical failure or power outage	
<input type="checkbox"/> other (ponds etc) <input type="text"/>	<input type="checkbox"/> rainfall inundation	
<input type="checkbox"/> Waste	<input type="checkbox"/> trade waste incident	
<input type="checkbox"/> waste from Council project/facility/activity	<input type="checkbox"/> break in main	
<input type="checkbox"/> dumped waste	<input type="checkbox"/> other <input type="text"/>	
<input type="checkbox"/> asbestos only		
<input type="checkbox"/> General		
<input type="checkbox"/> spill/overflow (chemical, fuel, substance etc) - additional detail required below		
<input type="checkbox"/> vegetation - disturbance / damage		
<input type="checkbox"/> general - (heritage, water, wildlife etc)		
<input type="checkbox"/> other <input type="text"/>		
DESCRIPTION OF INCIDENT		
<input type="text"/>		
ACTION TAKEN TO CONTAIN / MANAGE THE INCIDENT		
<input type="text"/>		
Were photos taken:	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Were samples taken:	YES <input type="checkbox"/>	NO <input type="checkbox"/>

DETAILS OF PERSON REPORTING THE INCIDENT

NAME	<input type="text"/>	DATE	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
PHONE	<input type="text"/>	MOBILE	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
DEPARTMENT SECTION									
<input type="text"/>									

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PART B

Report to Environmental Incident Hotline INVESTIGATION

PLACE YOUR
COUNCIL LOGO
HERE

The appropriate Section Supervisor/Manager is responsible for completion of Part B of the incident report.

IMMEDIATE ACTION BY SUPERVISOR/MANAGER

Will the incident:

- | | | | |
|---|------------------------------|-----------------------------|-----------------------------------|
| 1. Require assistance from other agencies to contain, isolate or cleanup?
If "Yes" call 000 immediately. | YES <input type="checkbox"/> | NO <input type="checkbox"/> | NOT SURE <input type="checkbox"/> |
| 2. Pose any actual or potential harm to human health that is not trivial?
• Is it located within 100m of a school, childcare centre, aged care home?
• Could it impact on users of public areas such as ovals, reserves, waterways?
• Could the impact spread and potentially harm occupants of nearby properties? | YES <input type="checkbox"/> | NO <input type="checkbox"/> | NOT SURE <input type="checkbox"/> |
| 3. Pose any actual or potential harm to ecosystems that is not trivial?
• Could the incident flow / impact on a water body or drainage system?
• Could the incident flow / impact on environmentally sensitive land? | YES <input type="checkbox"/> | NO <input type="checkbox"/> | NOT SURE <input type="checkbox"/> |
| 4. Result in actual or potential loss or property damage of an amount over \$10,000? | YES <input type="checkbox"/> | NO <input type="checkbox"/> | NOT SURE <input type="checkbox"/> |

If you answered 'YES' to any of the above then the incident should be considered as a notifiable "pollution event". There is a **duty to notify** the EPA, Ministry of Health, WorkCover and Fire and Rescue NSW immediately after becoming aware of a pollution incidents where material harm is caused or threatened. Failure to do so is an offence (*Protection of the Environment Operations Act 1997*)

AGENCY NOTIFICATIONS

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.

NSW EPA (EPA Environment Line: 131 555)

Contacted: YES NO Reason not contacted:

NAME OF EPA REPRESENTATIVE	TIME AND DATE	EPA REFERENCE NUMBER
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

ACTIONS REQUIRED BY EPA

NSW Health – Local Public Health Unit (See www.health.nsw.gov.au/publichealth/infectious/phus.asp)

Contacted: YES NO Reason not contacted:

NAME OF PHU REPRESENTATIVE	TIME AND DATE	PHU REFERENCE NUMBER
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

ACTIONS REQUIRED BY LOCAL PHU

WorkCover Authority (WorkCover: 13 10 50)

Contacted: YES NO Reason not contacted:

NAME OF WORKCOVER REPRESENTATIVE	TIME AND DATE	WORKCOVER REFERENCE NUMBER
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

ACTIONS REQUIRED BY WORKCOVER

Fire & Rescue NSW (Emergency Hotline: 000)

Contacted: YES NO Reason not contacted:

NAME OF FIRE & RESCUE REPRESENTATIVE	TIME AND DATE	FIRE & RESCUE REFERENCE NUMBER
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

ACTIONS REQUIRED BY FIRE & RESCUE

CONTINUES ON REVERSE

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OTHER NOTIFICATIONS TO CONSIDER INCLUDE:

- Internal contacts eg Environmental Health Officer
- Media
- NSW Food Authority
- Shellfish programs
- River users eg boat hiring companies
- Marine education centres
- Other

PRELIMINARY INVESTIGATION

Notes from discussions with relevant operational staff

Any further observations or comments by Supervisor / Manager

CATEGORISATION BY AUTHORISED OFFICER

- Minor**
No notification required
 - Incident affects small area only (eg single property) AND
 - Incident is easy to clean up without additional assistance, AND
 - There is no risk of material harm to humans or the environment.

- Moderate**
Notify EPA and Local PHU only
 - Incident affects more than one property OR
 - There is a risk of pollution or material harm to the environment BUT
 - Cleanup can be completed without assistance AND
 - There is no danger to humans.

- Major**
Notification required - Notify EPA, Local PHU, Workcover and Fire & Rescue
 - Potential or actual harm to humans and the environment AND/OR
 - Assistance is required with cleanup from other agencies.

- Council Responsible** Incident occurred as a direct result of Council activity or function.

- Response by Council** Incident occurred on Council land, or land under Council care and control BUT Council did not cause the incident.

- Technical Licence Breach** Relating to technical compliance such as exceedence of permissible discharge volume or environmental monitoring limits.

DETAILS OF APPROPRIATE SECTION SUPERVISOR/MANAGER REPORTING THE INCIDENT

NAME		DATE
<input type="text"/>		<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
PHONE	MOBILE	
<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	
DEPARTMENT SECTION		
<input type="text"/>		

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Appendix C Risk Assessments

Risk	Impact	Risk Rating	Controls
Sewage Retriculation System			
Sewage overflow due to heavy rainfall	Land contamination, possibly enter a waterway	Low	Spare Capacity in well, Monitoring and maintenance. Over flow storage at WTP.
Sewage overflow due to storm causing power failure	Land contamination, possibly enter a waterway	Low	Spare Capacity in well, Monitoring and maintenance. Over flow storage at WTP. Pumping stations have auto restart post power failure.
Sewage overflow due to reticulation blockages	Land contamination, possibly enter a waterway	Low	Monitoring and maintenance of sytem. Inspection of system with CCTV.
Sewage overflow due to damage of system by excuvations	Land contamination, possibly enter a waterway	Low	Locate services prior to excuvations.
Sewage overflow due to infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	Low	Maintenance and renewal programs
Sewage overflow due to mechanical breakdown	Land contamination, possibly enter a waterway	Low	Maintenance and renewal programs. Regular inspections. Good housekeeping around motors and pumps. Spare capacity in pumping station. Portable pumps.

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Risk	Impact	Risk Rating	Controls
WasteTreatment Plant			
Sewage overflow due to heavy rainfall	Land contamination, possibly enter a waterway	Low	Spare Capacity in well, Monitoring and maintenance. Over flow storage at WTP.
Sewage overflow due to storm causing power failure	Land contamination, possibly enter a waterway	Low	Spare Capacity in WTP, Monitoring and maintenance. Over flow storage at WTP.
Sewage overflow due to major flood	Waterway contamination.	Low	Notify community downstream that water maybe contaminated. Advise public to stay out of flood waters. Enact PIRMP.
Sewage overflow due to infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	Low	Maintenance and renewal programs

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This policy shall be reviewed on a Bi-Annual basis in consultation with the Work Health and Safety Committee and Consultative Committee.

OFFICE USE ONLY:

Version No: 6

Date Adopted: 10 May 2023

Review Date: 10 November 2023