Public Works
NSW Water Solutions

KHANCOBAN SEWERAGE SCHEME

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

December 2012

Snowy Valleys Council

A division of the Department of Finance & Services

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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

LICENCE NUMBER: 4400 (Surrendered on May 2017)

Approved by: Quentin Adams

Position/Title: Manager Utilities & Waste Business Signature: _____

Date: 20/05/2024

PURPOSE:

Khancoban STP and its collection system operate under Environmental Protection Licence (EPL) No. 4400 granted by the NSW Environment Protection Authority (EPA). The EPL licence has been surrendered on May 2017 but operation and maintenance of STP is being carried as it used to be. 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 out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

The objectives of the plan are to:

- communicate in a timely manner and with sufficient detail about a pollution incident to relevant authorities and people outside the facilities who may be affected by the impacts of the pollution incident;
- minimise and control the risk of any pollution incident occurring at the facilities by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

A copy of this plan will be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan will also be made available on Council's publicly accessible website http://www.snowyvalleys.nsw.gov.au

This management plan is to be continually updated and reviewed by Laxmi Pandey, Water/Wastewater Engineer, Snowy Valleys Council.

Foreword

This Pollution Incident Response Management Plan (PIRMP) for the Khancoban Sewerage Scheme is a document that has been developed for Snowy Valleys Council's (SVC) use in the operation and management of incidents at the Khancoban Sewage Treatment Plant (STP) and within its associated sewerage collection system. The purpose of this plan is to ensure that, where possible, pollution incidents are avoided but if they do occur they are managed appropriately to minimise the effects on the environment and to human health.

This PIRMP addresses the requirements under the *Protection of the Environment Legislation Amendment Act* (POELAA) 2011.

The objectives of the plan are to:

- communicate in a timely manner and with sufficient detail about a pollution incident to relevant authorities and people outside the facilities who may be affected by the impacts of the pollution incident;
- minimise and control the risk of any pollution incident occurring at the facilities through identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

A copy of this plan will be kept at the STP premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan will also be made available on Council's publicly accessible website http://www.snowyvalleys.nsw.gov.au

This management plan is to be continually updated and reviewed by Laxmi Pandey, Water/ Wastewater Engineer, Snowy Valleys Council.

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Contents

Foreword i
Contents iii
Abbreviations vi
1 Introduction 1
1.1 Sewage Treatment Plant and Collection System 1
1.2 Scope of the PIRMP 1
2 Context of the Assessment 4
2.1 Background 4
2.2 Council Commitment 5
2.3 Regulatory and Formal Requirements 7
2.4 NSW EPA Licence. 7
3 Assessment of the Risks 8
4 Preventative Actions to be Undertaken 13
4.1 General 13
4.2 Collection System 13
4.2.1 Pipelines 13
4.2.2 Sewage Pumping Station (SPS) 13
4.2.3 Reliable Power Supply 14
4.2.4 Provision of Emergency Storage 14
4.2.5 Alarm System 14
4.2.6 Response Times to Abnormal Operating Conditions 14
4.2.7 Stand-by Pumps 14
4.3 Sewage Treatment Plant (STP) 14
4.3.1 Dry Weather 18
4.3.2 Wet Weather 18
4.4 Sewage Treatment Plant Chemical Spills 18
5 Inventory of Pollutants and MSDS 19
5.1 Inventory of Stored Chemicals 19
5.2 Chemical Usage 19
5.3 Other Pollutants – Sewage and Effluent 19
5.4 MSDS 19
6 Safety Equipment 20
6.1 List of PPE Equipment Onsite 20
6.2 List of Monitoring Devices 20

7 Roles, Responsibilities and Contact Details 21
7.1 Stakeholder Responsibilities and Engagement 21
7.2 List of Contact Details 22
7.3 Council Procedures for Contacting Staff to Respond to a Possible Incident 23
8 Communicating with Neighbours and the Community 23
8.1 Pollution Incident Management. 23
8.1.1 Sewerage Incident Notification Protocol 23
8.1.2 Significant Public Health Risk Events 23
8.1.3 Information to be collected 24
8.1.4 Event Notification 24
8.2 Investigation of Incidents and Emergencies 25
8.3 Neighbours to be Notified 25
9 Minimising Harm to Persons on the Premises 26
9.1 Attendance Register 26
9.2 Site Induction 26
9.3 Evacuation Procedure 26
9.4 Emergency Assembly Point 26
10 Actions to be Undertaken During or Immediately After a Pollution Incident 27
10.1 Minor Incident Action Plan 27
10.2 Moderate Incident Action Plan 28
10.3 Major Incident Action Plan 29
11 Evaluation, Audit and Review for Continuous Development 30
11.1 Evaluation and Review 30
11.2 Auditing 30
12 References 31
13 Appendices 1
Appendix A - Attachments 1
Appendix B – Training Register 2
Appendix C – PIRMP Testing Register 3
Appendix D – Incident Reporting Form 4

Figures

Figure 1.1 Khancoban Sewage Collection System 2
Figure 1.2 Khancoban STP 3
Figure 10.1 Minor Incident Action Plan 27
Figure 10.2 Moderate Incident Action Plan 28
Figure 10.3 Major Incident Action Plan 29

Tables

Table 2.2: Formal and Regulatory Requirements 7
Table 3.1: Definitions of Likelihood 8
Table 3.2: Definitions of Impact 9
Table 3.3: Risk Analysis Criteria 10
Table 3.4: STP and Sewerage Collection System Risk Register 11
Table 6.1: List of PPE 20
Table 7.1: Stakeholder Responsibilities and Engagement 21
Table 7.2: Stakeholder Contact Details 22
Table 8.1: List of Neighbours to be Notified 25

Abbreviations

Abbreviation	Description
%	Percent
ABS	Australian Bureau of Statistics
ADWF	average dry weather flow
Ave.	average
BOD_5	(5 day) biochemical oxygen demand
d	day
DDWF	Design dry weather flow
DFS	(NSW) Department of Finance and Services
EP	equivalent person or equivalent population
EPL	Environment Protection Licence
g	grams
hr	hours
i	Intermittent decanted extended aeration
kg	kilogram
kg/d	kilogram per day
kg/h	kilogram per hour
kL	kilolitres
kL/d	kilolitres per day
L	Litre
L/EP/d	litres per EP per day
L/s	litres per second
m	metres
max.	maximum
mg/L	milligrams per litre
min.	minimum
mins	minutes
mL	millilitre
mm	millimetres
SVC	Snowy Valleys Council
MSDS	material safety data sheet
N	nitrogen
NATA	National Association of Testing Authority (Australia)
NFR	non-filterable residue
NH_3	ammonia
NH_3-N	ammonia nitrogen
NO_x	nitrites and nitrates (oxidised nitrogen)
NSW EPA	New South Wales Environment Protection Agency
O&G	oil and grease
Ortho-P	orthophosphates
P	phosphorus
pH	unit of measure of hydrogen ion activity in solutions
PIRMP	Pollution Incident Response Management Plan
POELAA	Protection of Environment Legislation Amendment Act
POEO	Pollution of Environment Operations (Act)
PPE	personal protective equipment
PWWF	Peak wet weather flow
SPS	sewage pumping station
SCADA	supervisory control and data acquisition system

SS	suspended solids
STP	sewage treatment plant
TKN	total kjeldahl nitrogen
TN	total nitrogen
TP	total phosphorus
TSS	total suspended solids
WHS	Work health and safety
yr	year

1 Introduction

Khancoban is a small town in Snowy Valleys Council. The town is located 567 km from Sydney, 87 km from the town of Tumbarumba and 13 km from the state border with Victoria. The 2021 Census showed Khancoban to have a population of approximately 319.

Khancoban is in the Snowy Valleys Local Government Area (LGA). Snowy Valleys Council owns and operates the Khancoban Sewerage Scheme that comprises the conventional gravity sewer system and a trickling filter plant. The treated effluent from STP is discharged to evaporation lagoons for final disposal.

1.1 Sewage Treatment Plant and Collection System

The Khancoban STP comprises the following treatment process units:

- an inlet work with flow measurement equipment;
- a metal filter screen unit;
- an imhoff tank;
- two trickling filter beds;
- a humus tank;
- a pumping station;
- eight sludge drying beds;
- four storm detention tanks/ holding tanks;
- five tertiary evaporation lagoons;
- an amenities building; and
- associated site services, i.e. water supply, drainage, lighting and roadworks.

The Khancoban sewage collection system has a conventional gravity sewer system to serve a small town, so there are no SPSs used in sewer system.

Sewage flows to the inlet works of the plant by gravity. After secondary treatment, the effluent gravitates to tertiary evaporation lagoons for final disposal. The storm flow is diverted to the holding tanks from the inlet works for temporally storage, and then pumps back to the sedimentation tank by a portable pump in the dry weather conditions

Figures 1.1 indicates Khancoban sewage collection system and the location of the STP, and **Figure 1.2** shows the layout of treatment facilities at the Khancoban STP.

The STP and its collection system operate under Environmental Protection Licence (EPL) No. 4400 granted by the NSW Environment Protection Authority (EPA). The EPL licence has been surrendered on May 2017 but operation and maintenance of STP is being carried as it used to be.

1.2 Scope of the PIRMP

The scope of the plan is as follows:

- Description and likelihood of hazards;
- Pre-emptive actions to be taken;
- Inventory of pollutants;
- Safety equipment;
- Contact details;

- Communicating with neighbours and the local community;
- Minimising harm to persons on the premises;
- Maps shown location of scheme components;
- Actions to be taken during or immediately after a pollution incident; and
- Staff training.

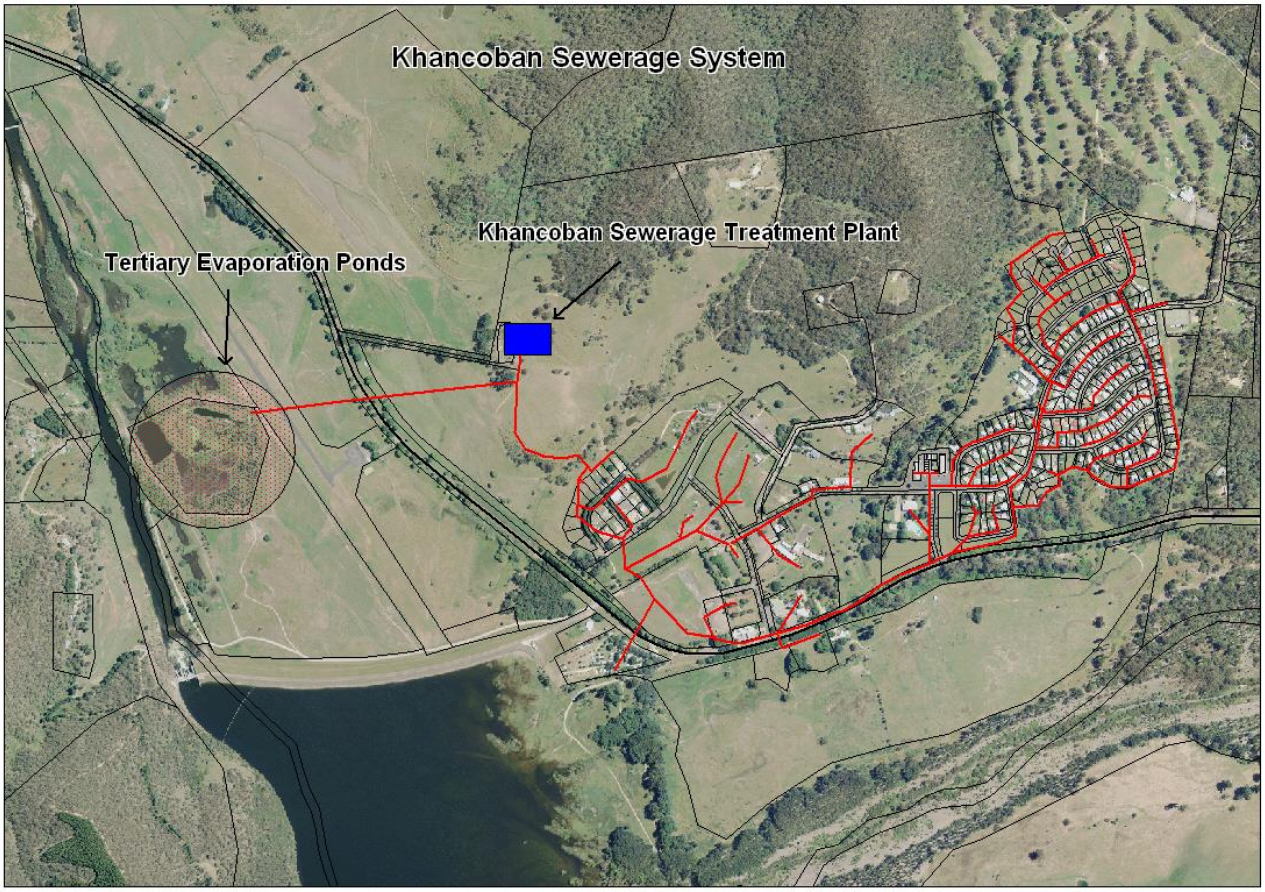


Figure 1.1 Khancoban Sewage Collection System

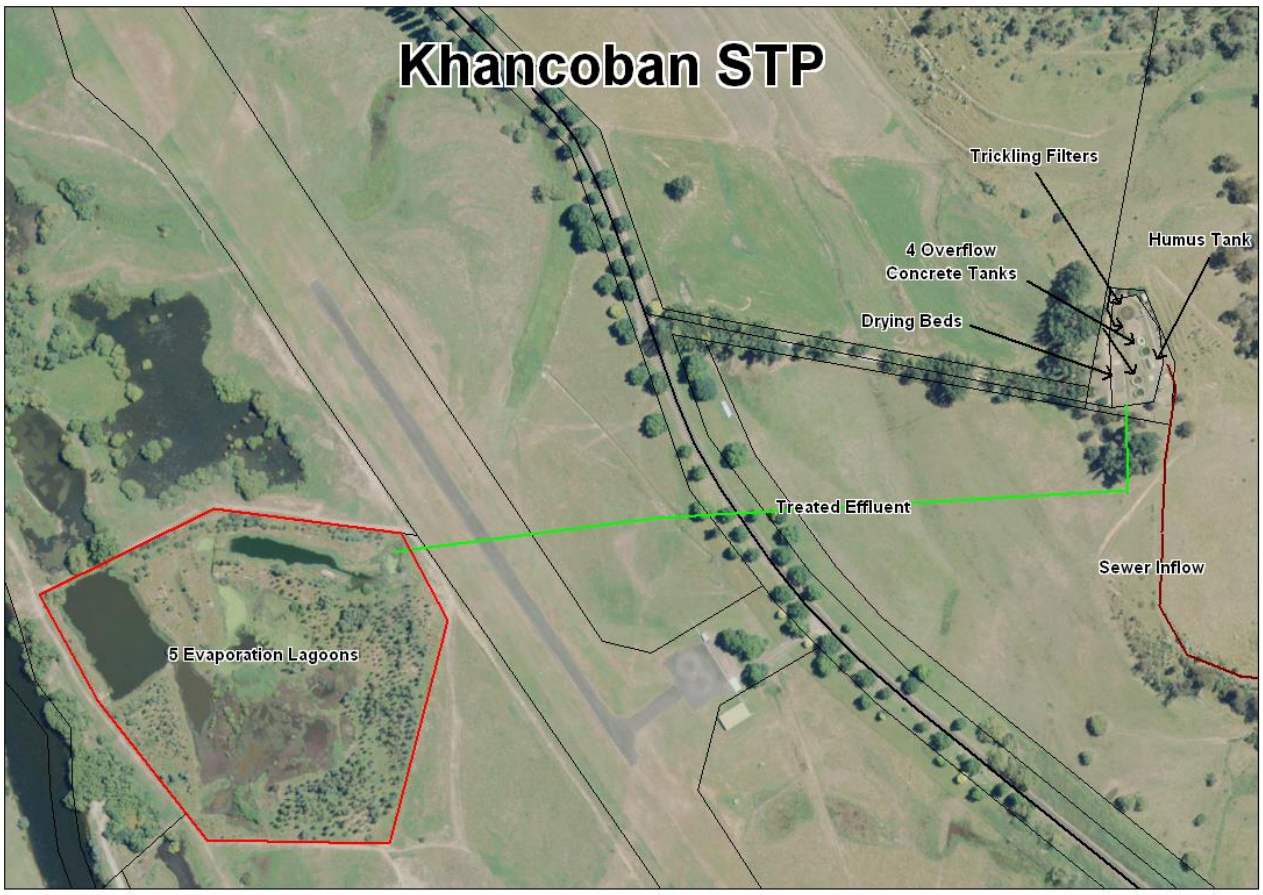


Figure 1.2 Khancoban STP

2 Context of the Assessment

2.1 Background

A new provision under the *Protection of the Environment Legislation Amendment Act* (POELAA) 2011 is the requirement to prepare, keep, test and implement a pollution incident response management plan for each environmental protection licence that Council holds.

The objectives of these plans are to:

- communicate in a timely manner and with sufficient detail about a pollution incident to relevant authorities and people outside the facilities who may be affected by the impacts of the pollution incident
- minimise and control the risk of any pollution incident occurring at the facilities by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

The NSW EPA defines a 'pollution incident 'as follows;

"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*

(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.

Industry is now required to report pollution incidents *immediately* to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in as fast a time as is practical.

The NSW EPA requires a plan to be implemented for all existing licenses by the 1st of September 2012. SVC has EPL 4400 for the Khancoban STP and its collection system. Licence was surrendered on May 2017 but operation are being carry on as per previous EPL conditions.

2.2 Council Commitment

Snowy Valleys Council is committed to protecting the health of the public, the environment and its workers. This commitment has been formalised and is contained in SVC's Management Plan for 2009 – 2012, and Local Environment Plan 2010 (Snowy Valleys Council is still operating with the former Tumbarumba Shire Council and Tumut Shire Council LEPs).

The Local Government Act contains a Charter for Local Government which describes the approach to supplying services and activities. It charges local government with a number of responsibilities including but not limited to the following:

- to provide directly or on behalf of other levels of government, after due consultation, adequate, equitable and appropriate services and facilities for the community and to ensure that those services and facilities are managed efficiently and effectively
- to exercise community leadership
- to properly manage, develop, protect, restore, enhance and conserve the environment of the area for which it is responsible, in a manner that is consistent with and promotes the principles of ecologically sustainable development
- to bear in mind that it is the custodian and trustee of public assets and to effectively account for and manage the assets for which it is responsible
- to engage in long-term strategic planning on behalf of the local community
- to keep the local community and the State government (and through it, the wider community) informed about its activities
- to ensure that, in the exercise of its regulatory functions, it acts consistently and without bias, particularly where an activity of the Council is affected.

Relevant Council's objectives and strategies with respect to its sewerage and environmentally related operations, as stated in its Management Plan are summarised in **Table 2.1** (refer to Management Plan for detailed objectives and strategies).

SVC also has a Local Environment Plan 2010 that set out planning strategies to protect environmental sustainability.

The aims of the Local Environment Plan 2010 are:

- to make local environmental planning provisions for land in Tumbarumba/Khancoban in accordance with the relevant standard environmental planning instrument under section 33A of the Act.
- to develop local planning controls that manage human settlement, rural activities and the natural environment in a manner that contributes to the unique quality of Tumbarumba/Khancoban,
- to encourage development that supports the long-term economic viability of the local community,
- to ensure development is undertaken in a manner that mitigates impacts on the natural environment,
- to encourage development that promotes positive social outcomes for the local community.

Table 2.1: Summary of SVC's Sewerage and Environmentally Related Objective and Strategies

Outcomes	Strategies
An efficient, reliable and environmentally responsible sewerage service.	• Prioritise construction and maintenance works and draft an Asset Replacement Program. • Strategically plan the delivery of services to the developing and unserviced areas • Monitor program delivery in terms of time and budgetary constraints through a risk management approach. • Develop and monitor preventative maintenance schedule for all major pumps and other critical infrastructure • Undertake Stormwater Infiltration reduction program of inspections and works. • Review liquid trade waste policy • Provide new service connection promptly and within procedure guidelines
Effective prevention and control of fire emergencies, in conjunction with the Rural Fire Services.	• Respond promptly to prevent loss of life and to minimise the potential for damage to stock, property and structures in the event of emergencies. • Ensure emergency services personnel have a workable disaster management plan (DISPLAN) and they work in close cooperation with State Forests, National Parks and private land-holders in the management of bushfires or other disasters. • Maintain equipment in accordance with standards of fire cover and resources provided by Rural Fire Services. • Foster the recruitment, training and development of volunteers. • Improve signage in rural areas to enable the identification of properties or locations for rapid response in emergencies. • Encourage responsible fire risk management practices.
Council's capacity to respond to natural and other emergencies and disasters is maintained and improved.	• Support and attend LEMC meetings.
The natural and built environment is protected and enhanced.	• Identify appropriate species of trees for planting. • Continue to support the Catchment Management Authority. • Remove willows from Shire creeks and rivers.
High standards of stream health and biodiversity within Snowy Valleys Council.	• Investigate pollution of water courses and biodiversity within Snowy Valleys Council.

Pollution of the Environment Operations Act 1997 is enforced.	• Investigate noise, air and water pollution and environmental

2.3 Regulatory and Formal Requirements

The regulatory and formal requirements applicable to the Khancoban Sewerage Scheme are shown in **Table 2.2**. These legislative and licensing requirements and guidelines are to be met to ensure the protection of environmental and public health and to satisfy work health and safety (WHS) requirements. This management plan addresses how these requirements are to be met.

Table 2.2: Formal and Regulatory Requirements

Parameter	Instrument	Administered by
Overall Scheme Operation	Water Management Act 2000	NSW EPA
	Local Government Act 1993	DPIE Water
Public Health	Environment Operations Act 2011	NSW EPA, NSW Health
Environmental Health	Section 55 Protection of the Environment Operations Act 2011 Environment Protection Licence No. 4400	NSW EPA
Work Health and Safety (WHS)	Work Health and Safety Act 2011 (WHS Act) and the WHS Regulations.	WorkCover Authority of NSW
Plumbing	All pipe work associated with transport sewage to the STP is to be installed in accordance with AS/NZS 3500 (Plumbing and Drainage Code: Standards Australia 1996-2003)	Snowy Valleys Council

2.4 NSW EPA Licence.

Khancoban STP is covered by Environment Protection Licence (EPL) No.4400. It has been surrendered on May 2017 but operation are being carry on as per previous EPL conditions.

There were no load limits and concentration limits stated in EPL due to final effluent discharged into evaporation lagoons for disposal. The licence restricts the effluent quantity discharge only, which is 800 kL/day at 100 percentile.

3 Assessment of the Risks

A risk assessment was undertaken with SVC's water and sewerage operators at Khancoban on the 27 September 2012. The objective of the assessment was to:

- identify the hazards,
- identify hazardous events
- assessment of the likelihood of the event and other factors that may increase the likelihood
- assess the impacts
- assess the overall risk.

Shown in **Table 3.1**, **Table 3.2** and **Table 3.3** are the likelihood, impact and risk criteria used in the assessment. **Table 3.4** is detailed risk assessment for Khancoban STP.

Table 3.1: Definitions of Likelihood

Level	Likelihood	Description
A	Almost certain	- The event is expected to occur often (several times per year)
B	Likely	- The event will probably occur often (once every 1-3 years)
C	Possible	- The event might occur at some time (once every 3 to 10 years)
D	Unlikely	- The event could occur at some time (once every 20 years)
E	Rare	- The event may occur only in exceptional circumstances (once every 100 years)

Table 3.2: Definitions of Impact

Level	Classification	Description
1	Insignificant	The overflow is extremely unlikely to drain to a local sensitive environment* and: - Where the overflow reaches waters, the volume of sewage likely to enter the waterways is insignificant with regard to the volume and flow of receiving waters, or - Where the overflow reaches land, it is likely to be contained in an area with little chance of public exposure within the maximum response time**
2	Minor	The overflow is unlikely to drain to a local sensitive environment* and: - Where the overflow reaches waters, the volume of sewage likely to enter the waterways may be significant with regard to the volume and flow of receiving waters, or - Where the overflow reaches land, it is likely to be contained in an area where the public exposure is minimal given the maximum response time**
3	Moderate	The overflow is likely to drain to a local sensitive environment* and: - Where the overflow reaches waters, the volume of sewage likely to enter the waterways is significant with regard to the volume and flow of receiving waters, or - Where the overflow reaches land, it may travel to an area where public exposure is low within the maximum response time**
4	Major	The overflow is likely to drain to a local sensitive environment* and: - Where the overflow reaches waters, the volume of sewage likely to enter the waterway is high with regard to the volume and flow of receiving waters, or - Where the overflow reaches land, the public exposure risk is likely given the maximum response time**
5	Catastrophic	The overflow is likely to drain to a local sensitive environment* and: - Where the overflow reaches waters, the volume of sewage likely to enter the waterways is high with regard to the volume and flow of receiving waters, or - Where the overflow discharges to land, the public exposure risk is high given the maximum response time**

*A sensitive environment includes: a drinking water catchment or domestic groundwater source, or shellfish growing area, or protected water bodies, ecological communities or conservation areas defined by legal an non-legal instruments, such as local environment plans (LEPs), State Environmental Planning Policies (SEPPs), national parks, and class P or class S waters, or waterways used for primary contact recreation, or a recreational area or other area with high public exposure or associated health risk.

**Maximum response time should be based on the length of time taken for the licensee to detect the overflow, or for the overflow to be reported, and the time taken for the licensee to attend the site and secure against public contact

Table 3.3: Risk Analysis Criteria

Likelihood	**Impacts**				
	Insignificant **1**	Minor 2	Moderate **3**	Major **4**	Catastrophic **5**
Almost Certain – **A**	Low	Moderate	High	Very High	Very High
Likely – **B**	Low	Moderate	High	Very High	Very High
Possible – **C**	Low	Moderate	Moderate	High	Very High
Unlikely – **D**	Low	Low	Moderate	High	Very High
Rare – **E**	Low	Low	Low	Moderate	High

Table 3.4: STP and Sewerage Collection System Risk Register

	Contaminant	Description of the Hazardous Event	Human Health (Public Health)	Environmental Risks	Likelihood Almost certain - several times p.a Likely - once every 1 - 3 years Possible - once every 3 - 10 years Unlikely - once every 20 years Rare- once every 100 years	Events or Circumstances that would exacerbate or increase likelihood	Impact Insignificant Minor Moderate Major	Assessed Risk Low Moderate High Very High	Pre-emptive Actions (Existing Controls) In addition to operator training, SWMSs
STP									
1	**Effluent**	**Septage upsets process**		✓	Rare	Illegal dumping of septage into sewer lines.	Minor	Low	• Gravity reticulation system. • Final effluent discharged to evaporation lagoons for final disposal.
2	**Effluent**	**Stormwater inflow to STP causing overflow**	✓	✓	Rare	Flooding event	Minor	Low	• 4 stormwater detention/ holding tanks
3	**Effluent**	**Poor quality – sabotage of plant**	✓	✓	Rare	Flooding event	Minor	Low	• Final effluent discharged to evaporation lagoons for final disposal.
4	**Effluent**	**Poor quality – extended power failure**	✓	✓	Unlikely	Flooding event	Minor	Low	• Effluent from the humus tank gravitates into evaporation lagoons. • Final effluent discharged to evaporation lagoons for final disposal.
5	**Effluent**	**Equipment failure**	✓	✓	Unlikely	Equipment malfunction	Minor	Low	• Gravity reticulation system. • The humus tank provides more capacity to store settled sludge when pumps are failure. • Setup equipment maintenance schedule.

	Contaminant	Description of the Hazardous Event	Human Health (Public Health)	Environmental Risks	Likelihood Almost certain - several times p.a Likely - once every 1 - 3 years Possible - once every 3 - 10 years Unlikely - once every 20 years Rare- once every 100 years	Events or Circumstances that would exacerbate or increase likelihood	Impact Insignificant Minor Moderate Major	Assessed Risk Low Moderate High Very High	Pre-emptive Actions (Existing Controls) In addition to operator training, SWMSs
6	**Raw sewage**	**Untreated sewage overflows to Creek**	✓	✓	Unlikely	Flooding event	Minor	Low	• 4 storm water detention/ holding tanks.
7	**Raw sewage**	**Untreated sewage overflows to Creek – extended power failure**	✓	✓	Unlikely	Flooding event	Minor	Low	• Gravity reticulation system. • 4 storm water detention/ holding tanks. • Reliable power supply. • 5 evaporation lagoons.
Gravity Reticulation System									
11	**Raw sewage**	**Untreated sewage overflow due to blockage of pipelines**	✓	✓	Possible	Wet weather event	Minor	Low	• SVC set out emergency response time guideline. For emergency situation it is required action as quick as possible, but not more than defined hours.
13	**Raw sewage**	**Upstream surcharge**	✓	✓	Unlikely	• Pipe blockage • Excavation works	Moderate	Moderate	• Utilise dial before you dig • Leakage can easily be detected. • In-store portable emergency pump for bypass/ diversion.

4 Preventative Actions to be Undertaken

4.1 General

The preventative actions or measures to manage and minimise the risk to human health and the environment involve a multiple barrier approach. The multiple barriers, in order of preference, are as follows;

- Elimination
- Substitution
- Isolation
- Engineering means
- Administrative
- Personal Protection Equipment (PPE)

These are readily broken down to the following classification of management strategies:

- Appropriate design of the facilities
- Appropriate operation and monitoring and
- Appropriate education and training

4.2 Collection System

Collection system overflows can principally occur from five main causes. These are:

- Reticulation system blockage/leakage
- Rising main breakage (leaks or major failure),
- Breakdown of pump units, and
- Excessive inflows.

4.2.1 Pipelines

Overall the Khancoban reticulation system is in good condition, which has a sufficient capacity and the number of overflows or incidents per kilometre of pipeline per year would be considered low by industry standards. SVC uses water jetting equipment to clear blockages occurred in reticulation mains frequently. The main cause is tree root intrusions but can also occur due to foreign objects lodging in the pipelines.

There have been no recorded overflow events from the reticulation system in the recent past.

Potential for breaks in sewage pipeline exists during flooding events or undertaking excavation works, which may result in sewage discharging into Creek.

4.2.2 Sewage Pumping Station (SPS)

There are no pumping stations used in Khancoban sewerage collection system.

4.2.3 Reliable Power Supply

SVC has reported that Khancoban has a reliable power supply. Generally power outages in the Khancoban area are not common. Power failures of extended duration are possible but are usually planned outages.

4.2.4 Provision of Emergency Storage

Not applicable.

4.2.5 Alarm System

Not applicable.

4.2.6 Response Times to Abnormal Operating Conditions

Response times are expected to be short based on SVCs emergency response time guideline. The average response time is 4 hours within working hours and 8 hours outside working hours. For emergency situation action is required as quick as possible, but within the defined hours.

4.2.7 Stand-by Pumps

Not applicable.

4.3 Sewage Treatment Plant (STP)

Khancoban STP is a 2,000 EP capacity treatment plant. The plant is a trickling filter type biological process to treat sewage to secondary treatment level, the process consists of the following facilities:

- an Inlet works with metal Screen.
- an imhoff tank;
- two trickling filters.
- a humus tank;
- a pumping station;
- eight sludge drying beds;
- four storm detention tanks (holding tanks);
- five tertiary evaporation lagoons;
- an amenities building; and
- associated site services, i.e. water supply, drainage, lighting and roadworks.

The Khancoban STP is a relatively simple STP, which is under loaded based on the current connected population.

At present, all flows gravitate to the inlet works at flow rate of 150 kL/day at ADWF and fully treated by a trickling filter. The trickling filter generally allows for at least partial treatment for flows between DDWF and PWWF.

Equipment failure that may occur at the STP includes

- pumps failure at the STP pumping station – the purpose of the pumping station is to pump settled sludge from the humus tank to the imhoff tank. After sedimentation in the imhoff tank, the sludge/ sediments are discharged to sludge drying beds for dewatering. Even if pumps fail, sludge can be drained to sludge drying beds from the humus tank. Therefore the impact of pump failure is minor.

The STP is well operated, there have been no flooding events recorded at the plant. There is no telemetry system provided at the plant. The Operator lives locally to the STP and follows the “STP Routine Operations and Maintenance Work Schedule from Monday to Sunday” to maintain all equipment used in the plant. The process units of the STP are illustrated by **Figures 4.1** to **4.6.**

Figure 4.1 STP Inlet Works

Figure 4.2 STP Sedimentation Tank

Figure 4.3 STP Trickling Filter Beds

Figure 4.4 STP Stormwater Detention/ Holding Tanks

Figure 4.5 STP Pumping Station

Figure 4.6 STP Sludge Drying Beds

4.3.1 Dry Weather

Generally, unless exceptional circumstances such as malfunction of systems due to mechanical/ electrical failure or blockages occur, overflows at the STP in dry weather flow conditions are extremely unlikely.

No dry weather overflows events (or even near events) have been recorded in the recent past.

4.3.2 Wet Weather

The STP has no records of a flooding event since it was built. Sewage overflows into storm detention tanks for temporary storage in wet weather conditions, and later the water is pumped back to trickling filter beds for treatment in the dry weather conditions via the pump station.

4.4 Sewage Treatment Plant Chemical Spills

There are no chemicals used at the Khancoban STP, so chemical spills are not an issue.

5 Inventory of Pollutants and MSDS

5.1 Inventory of Stored Chemicals

Not applicable.

5.2 Chemical Usage

Not applicable.

5.3 Other Pollutants – Sewage and Effluent

There are not load limits and concentration limits stated in EPA Licence due to final effluent being discharged into tertiary evaporation lagoons for final disposal. So pollutants in the sewage are not issues.

5.4 MSDS

Not applicable.

6 Safety Equipment

Safety equipment or other devices that are onsite will minimise the risks to human health or the environment and contain or control a pollution incident. These will include any personal protective equipment (PPE), material safety data sheets (MSDS), monitoring devices and spill containment equipment.

6.1 List of PPE Equipment Onsite

The following PPE safety equipment is provided onsite:

Table 6.1: List of PPE

Personal Protective Equipment	Location	Location
Hearing protection	STP	STP and Operator's Vehicle
Protective gloves	STP	STP and Operator's Vehicle
Dust mask	STP	STP and Operator's Vehicle
Safety glasses	STP	STP and Operator's Vehicle
Safety apron	STP	STP and Operator's Vehicle

6.2 List of Monitoring Devices

There are no SCADA and telemetry systems installed at the STP.

7 Roles, Responsibilities and Contact Details

7.1 Stakeholder Responsibilities and Engagement

SVC has committed to operating its STP and collection system in a responsible manner. Effective stakeholder engagement is necessary to fulfil this commitment. **Table 7.1** presents the stakeholders involved in the operation of the STP and collection system, sets out their roles, the communication expected to occur to achieve safe operation of the plant and collection system. Further information on the operation of the system and communication protocols is addressed later in this plan.

Table 7.1: Stakeholder Responsibilities and Engagement

Stakeholder	Responsibility
Snowy Valleys Council, Manager Utilities & Waste Business	• Overall scheme operation/ responsibility • Management of operations staff, reporting issues regarding operation, maintenance and compliance to Council, resolving site issues.
NSW Health	Public health risk assessment and issues
NSW EPA	• Issuer of EPL • Policing of licence compliance
DPE Water	• Assist Council with process treatment issues • Monitor compliance with licence • Plant inspections
NSW WorkCover	Work Health and Safety (WHS) issues
Community of Khancoban	Advice where required during incidents
Police /Fire brigade/HAZMAT/ Ambulance/ SES	Response to emergencies (e.g. spills, injuries and accidents.

7.2 List of Contact Details

The contact details of the stakeholders are listed below in **Table 7.2**.

Table 7.2: Stakeholder Contact Details

Organisation	Position / Contact Person	Contact Details
Snowy Valleys Council	Council contact number	(02) 6948 9100 0427 470 555 (After Hours) 1800 069 280 (free call)
	Operators/ On & Off hour call Khancoban Team Leader	0438 285 408
	Ian Reynolds Khancoban Team Leader	0438 285 408(mobile) (02) 6941 2450 (office)
	David Sam Coordinator Utilities - Works	0436 279 959 (mobile) 02 6941 2430 (office)
	Greg Edward Engineer Water and Wastewater	0437 951 365 (mobile) 02 6941 2526 (office)
	Quentin Adams Manager Utilities & Waste Business	0417 645 862 (mobile) 02 6941 2589 (office)
	Environmental Health Officer	0429 314 050 (mobile) 02 6941 2532 (office)
	Steven Pinnuck Interim General Manager	0429 310 205 (mobile) 02 6941 2567 (office)
	Director Infrastructure & Works	0408 658 128(mobile) 02 6941 2402 (office)
	Council's Risk Management Officer	0436 014 129 (mobile) (02) 6941 2513 (office)
	Coordinator Safety & Systems	0427 814 411 (mobile) (02) 6941 2410(office)
NSW EPA	Pollution Hot Line	131 555
NSW Health	Public Health Unit Murrumbidgee and Southern	0428 693 374 (mobile) (02) 6933 9120/ 02 5943 2044 (office)
NSW DPI, Fisheries	Fisheries, Tumut	02 6941 1400 0484 907 343
NSW Department of Planning, Industry and Environment (DPIE Water)	Mark Bradshaw -Water and Sewerage Treatment Officer	0427 324 893 (mobile) (02) 6024 8854 (office)
Emergency Services	Police, Fire Brigade, Ambulance, Hazmat, SES	1300 729 579
Safe Work NSW		131 050

7.3 Council Procedures for Contacting Staff to Respond to a Possible Incident

If operators find out faults, Operators will attend to fix the problem and report to the Khancoban Team Leader or Coordinator Utilities – Works or Engineer Water and Wastewater as soon as possible.

Any blockages reported within the sewage collection system are attended to by the Operators and cleared with Jet Cleaner. All works are undertaken to comply with the relevant Safe Work Method Statement(s). Appropriate action report forms are to be completed.

8 Communicating with Neighbours and the Community

To determine the appropriate communication strategy for an incident the incident needs to be categorised. Once categorised the prescribed communication strategy can be deployed.

8.1 Pollution Incident Management.

8.1.1 Sewerage Incident Notification Protocol

Pollution incidents are currently managed via SVC's "Sewer Incident Notification Protocol" and a "Sewer Spills or Overflows" checklist which are in place for its sewage transport and treatment systems at Khancoban.

The objective of the protocol is to ensure that all relevant organisations and members of any affected communities are notified of overflows and sewage treatment bypasses. It is important to note that the notification protocol does not allow for members of the community to be notified of every bypass and/or overflow event. Community members will only be notified if the incident is considered to be "significant risk to public health". The risk to public health will be determined following consultation with NSW Health representative by SVC's Manager Utilities & Waste Business or Engineer Water and Wastewater.

The triggers for notification are:

- Discharge from the STP of raw sewage or partially treated effluent from the STP which may pose as a public health risk; or
- An observed or reported overflow from the reticulation system, or STP which may pose as a public health risk.

8.1.2 Significant Public Health Risk Events

Examples of events that are considered to be of "significant risk to public health" when an overflow or bypass has occurred:

- in a public park or sporting field where significant usage for recreational activities is being undertaken;
- inside the grounds of or in close proximity to a school or a child care centre; and/or
- at the treatment plant where disinfection has been compromised of bypass of the secondary treatment process has occurred with subsequent discharge of untreated/partially treated wastewater to receiving waters.

If a public health risk is assessed, SVC will:

- initiate a water quality sampling and testing program to be undertake by qualified and independent personnel to monitor and manage any public health threat related to the event; and

- erect signs and barricades as required.

8.1.3 Information to be collected

Information to be collected in the event of an overflow or bypass from the reticulation system, at a sewage pumping station or a sewage treatment plant will include but not be limited to:

- The location of the overflow/bypass and a description of the receiving environment;
- Date, estimated start time and duration of event;
- Volume of overflow/bypass;
- Classification of overflow/bypass due to dry (eg. power and mechanical equipment failure) and/or wet (ie. due to heavy rainfall) weather ;
- Probable cause of the overflow/bypass;
- Actions taken to stop overflow/bypass from occurring;
- Clean up activities undertaken; and
- Mitigating actions to prevent overflow/bypass from recurring.

8.1.4 Event Notification

Information provided to the Community will generally be sufficient to reduce public health risks to an acceptable level.

The need and extent of notification of overflows/bypasses will be assessed on a case by case basis as follows:

- The SVC Director Infrastructure & Works, Environmental Health Officer, Manager Utilities & Waste Business and Engineer Water & Wastewater will determine whether the Community or neighbours have the potential to be affected and how they will be notified;

Event notification will consist of:

- Ringing NSW EPA's Pollution Line of 131555.
- Notification within of 48 hours of SVC being aware of the overflow/bypass incident and provision (by fax or email) of completed "Record of Sewer Overflow" report within a week after the incident to the following bodies:
    - NSW Health;
    - NSW EPA;
    - DPE Water;
    - SVC's Corporate and Community Services Section and
    - SVC's Environmental Services Section.

Contact details are provided in **Table 7.2**.

8.2 Investigation of Incidents and Emergencies

Following any incident or emergency situation, including any “near misses”, an investigation will be undertaken and all involved staff should be debriefed, to discuss performance and address any issues or concerns.

The investigation will consider factors such as:

- What was the initiating cause of the problem?
- How was the problem first identified or recognised?
- What were the most critical actions required?
- What communication problems arose and how were they addressed?
- What were the immediate and longer term consequences?
- How well did the protocol function?

Water Directorate Incident Reporting Form can be downloaded from www.waterdirectorate.asn.au

8.3 Neighbours to be Notified

The list of neighbours to be notified is shown in **Table 8.1**. The list provides information of locations of potential overflow occurrence, contact name, contact phone numbers and properties address.

Council’s Director Infrastructure & Works, Environmental Health Officer, Manager Utilities & Waste Business and Engineer Water & Wastewater will determine whether the Community or neighbours have the potential to be affected and how they will be notified.

Table 8.1: List of Neighbours to be Notified

Location	Contact Person	Contact Details	Property Address	Comments
KHANCOBAN	CHARLES FINDLAY	02 6076 9474 0474435955	ADJ STP	
KHANCOBAN	PETER SCOBIE	0428 482 321	KINGLAKE	
KHANCOBAN	BERTIE BUTLER	02 6076 9222 0409021911	KHANCOBAN STATION	
KHANCOBAN	SDPIE WATERY HYDRO	02 6076 5550	COOMA OPERATION	
KHANCOBAN	PAUL NUGENT	02 6076 0549	GLENFERRY	

9 Minimising Harm to Persons on the Premises

9.1 Attendance Register

There is no an attendance register observed at the STP. It is because only Operators have a key, all visitors do not have access to the plant when Operator is not present. However, SVC will set up an attendance register and place in front of amenities building.

9.2 Site Induction

Visitors are inducted by the STP Operator prior to getting access to treatment areas of the site.

9.3 Evacuation Procedure

The evacuation procedure is depicted on a plan displayed in the amenities building/site office.

9.4 Emergency Assembly Point

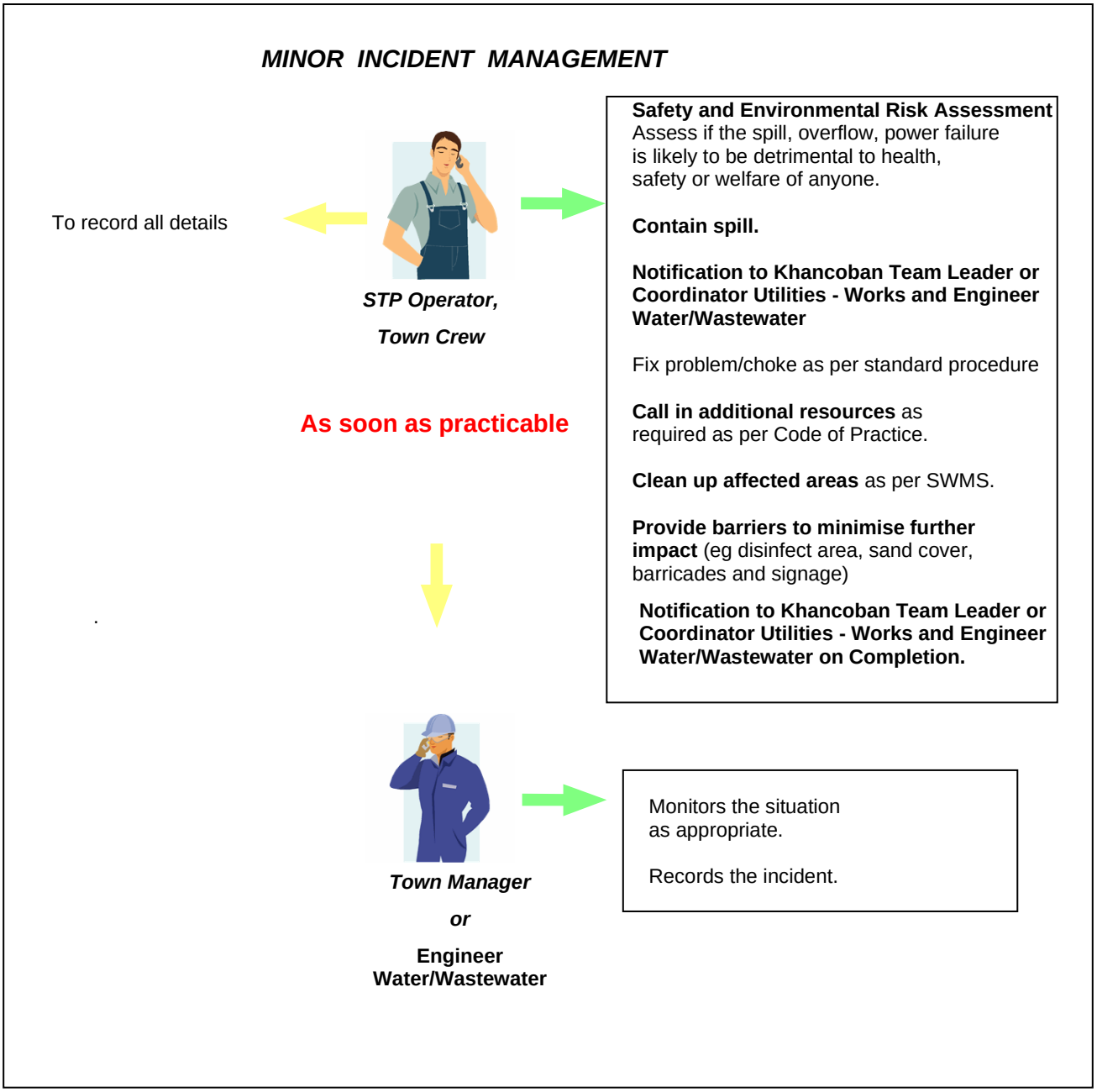
The emergency assembly point is at the front gate near the entrance to the STP. But the signage displayed at the emergency assembly point is needed a better display. SVC will display a signage at the emergency assembly point soon.

10 Actions to be Undertaken During or Immediately After a Pollution Incident

10.1 Minor Incident Action Plan

The action plan for minor incidents is shown in **Figure 10.1**:

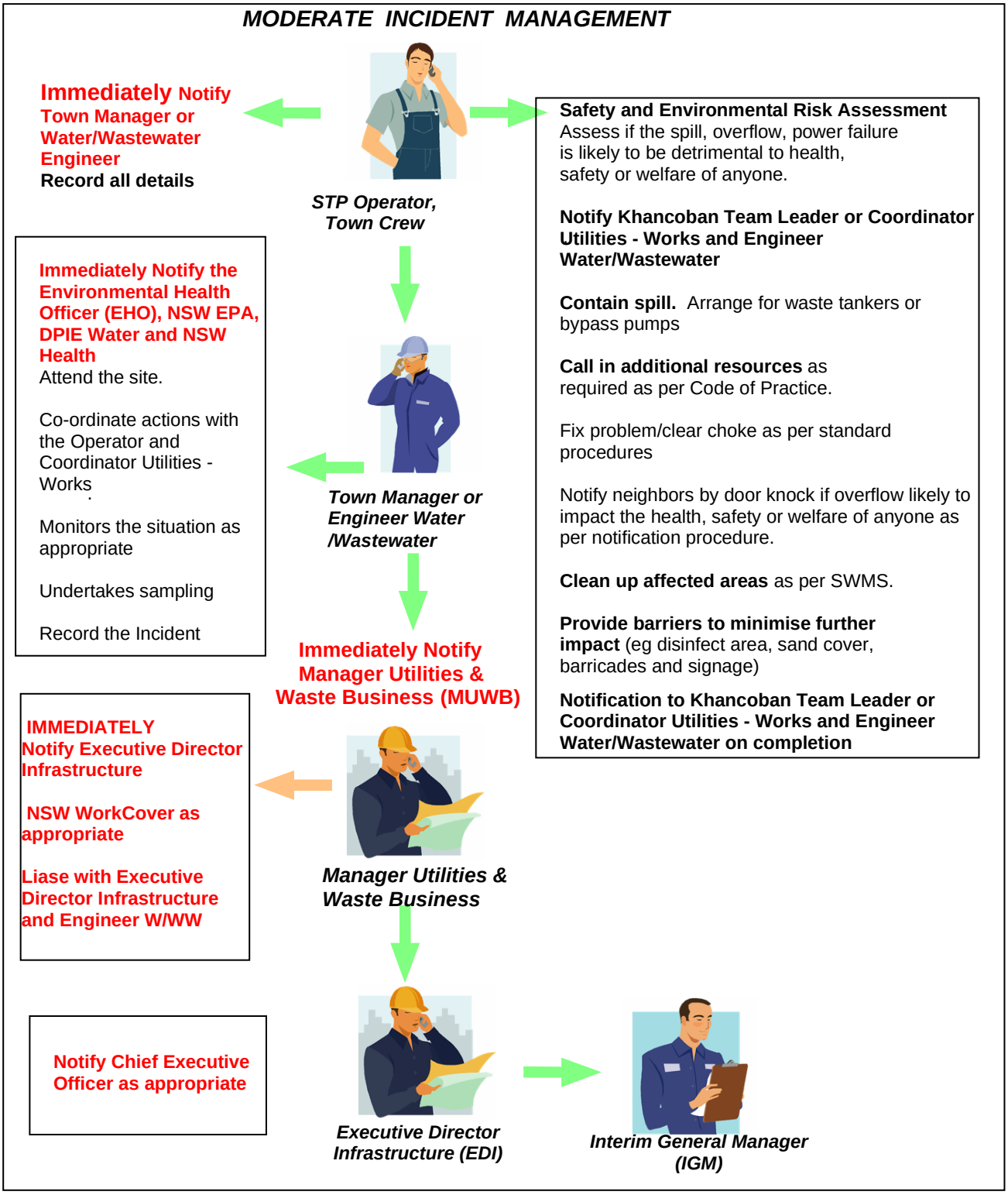
Figure 10.1 Minor Incident Action Plan



10.2 Moderate Incident Action Plan

The action plan for significant incidents is shown in **Figure 10.2**:

Figure 10.2 Moderate Incident Action Plan

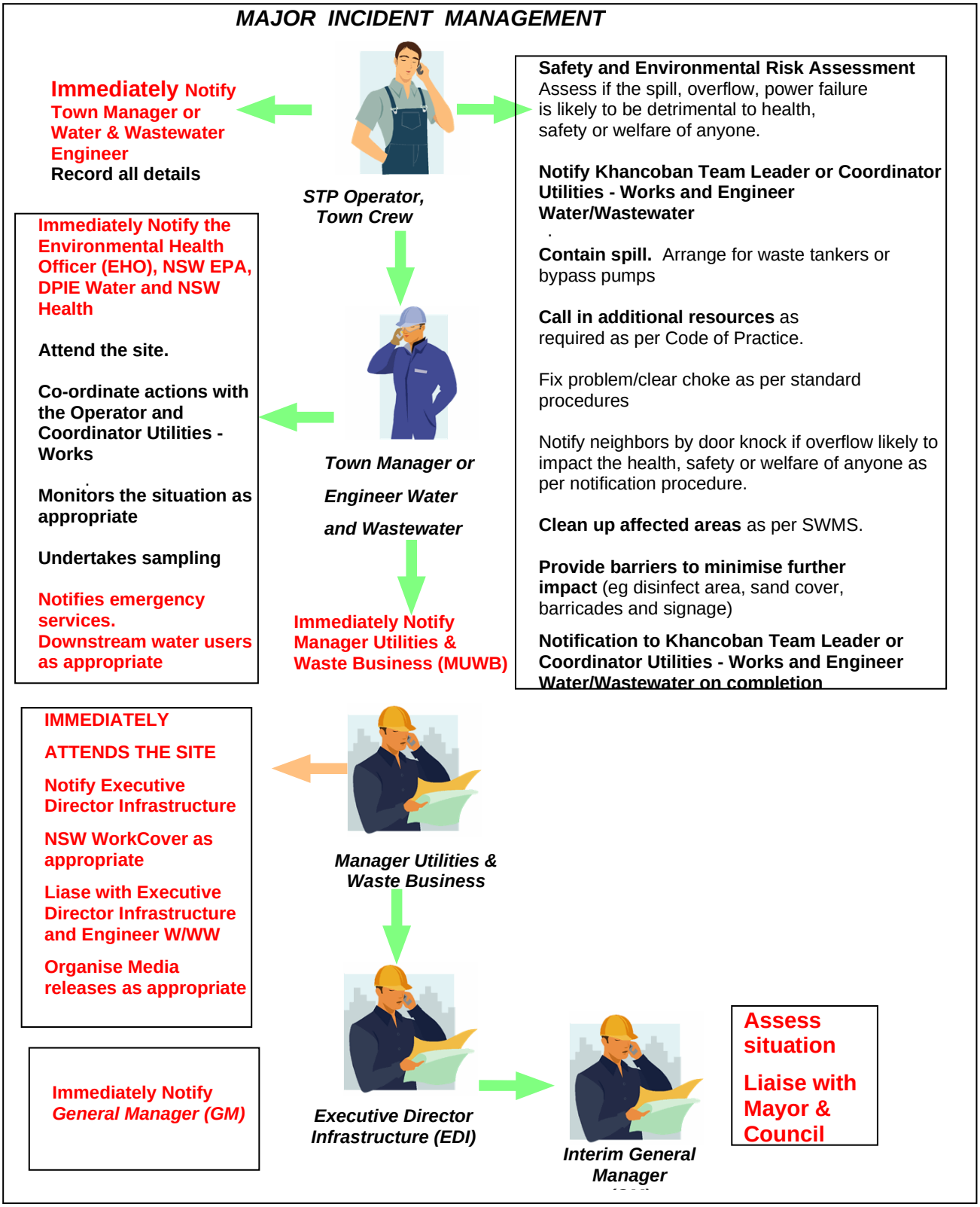


Note: If the Engineer W&WW is not able to contact MUWM or EDI, Engineer W&WW will notify EPA, Health, Work Covers, DPIE Water and IGM.

10.3 Major Incident Action Plan

The action plan for significant incidents is shown in **Figure 10.3**:

Figure 10.3 Major Incident Action Plan



Note: If the Engineer W&WW is not able to contact MUWM or EDI, Engineer W&WW will notify EPA, Health, Work Covers, DPIE Water and IGM.

11 Evaluation, Audit and Review for Continuous Development

11.1Evaluation and Review

A systematic review of the plan will be undertaken by the Engineer Water and Wastewater annually or within one month of an incident occurring at the plant. The evaluation will:

- Assess the relevance of the risk assessment against the current state of the plant
- Identify any emerging problems and trends
- Assess the communication between SVC, SVC operational staff and regulators
- Assist in determining priorities for improving procedures
- Assessment of incidents and responses determined
- Determine when and what is to be audited in the next six months

Evaluation of results described above will be documented and the plan updated.

Evaluation will be reported to the stakeholders.

11.2 Auditing

Auditing of the pollutant inventory is to be done annually.

An audit may also be triggered by a significant incident or if the process chemical is changed.

12 References

1. POELA Act 2011
2. POEO Act 1997
3. SVC Website, “Snowy Valleys Council Management Plan 2009-2012” accessed on 23/10/2012.
4. NSW EPA, Environment Protection Licence (EPL) No. 4400.
5. Tumbarumba STP Routine Operations and Maintenance Work from Monday to Sunday.
6. Tumbarumba STP Daily Operation and Emergency Management Strategy.
7. Snowy Valleys Council’s Complaints Handling Policy.
8. Snowy Valleys Council’s Confined Space Policy.
9. Snowy Valleys Council’s Hazardous Substance Policy.
10. Snowy Valleys Council’s Manual Handling Policy.
11. Snowy Valleys Council’s Occupational Health and Safety Policy.
12. Snowy Valleys Council’s Personal Protective Equipment Policy.
13. Snowy Valleys Council’s Risk Management Policy.
14. Snowy Valleys Council’s Workplace Safety Audit and Inspection Policy.

13 Appendices

Appendix A - Attachments

1: Tumbarumba STP Routine Operations and Maintenance Work from Monday to Sunday.
2: Tumbarumba STP Daily Operation and Emergency Management Strategy.
3. Snowy Valleys Council's Complaints Handling Policy.
4. Snowy Valleys Council's Confined Space Policy.
5. Snowy Valleys Council's Hazardous Substance Policy.
6. Snowy Valleys Council's Manual Handling Policy.
7. Snowy Valleys Council's Occupational Health and Safety Policy.
8. Snowy Valleys Council's Personal Protective Equipment Policy.
9. Snowy Valleys Council's Risk Management Policy.
10. Snowy Valleys Council's Workplace Safety Audit and Inspection Policy.

Appendix B – Training Register

Date	Name	Description of Training
28/08/2014	Adrian/Laxmi	Training provided to STP Operator
27/10/2022	David Sam/Ian Reynolds	Training provided to Team Leader

Appendix C – PIRMP Testing Register

Test Date	Name	Comment
28/08/2014	Adrian/Laxmi	PIRMP's desktop testing carried out and few update recommended, which is incorporated in report
3/08/2016	Adrian/Mick/Laxmi	PIRMP's desktop testing carried out and few update recommended, which is incorporated in report
14/09/2017	Adrian/Mick/Laxmi	PIRMP's desktop testing carried out and few update recommended, which is incorporated in report
--/--/2019	Adrian/David/____	PIRMP's desktop testing carried out and few update recommended, which is incorporated in report
27/10/2022	David Sam/Ian Reynolds	PIRMP's desktop testing carried out and few update recommended, which is incorporated in report

Appendix D – Incident Reporting Form

PART A

Report to Environmental Incident Hotline
LOCATION OF INCIDENT

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 go to the **EPA website** (www.epa.nsw.gov.au/pollution/notificationprotocol.htm)

☐ Project ☐ Facility ☐ Activity ☐ Location/Name:

STREET NUMBER

STREET NAME

SUBURB

NEAREST CROSS STREET

WHERE DID THE INCIDENT OCCUR

SECTION/UNIT RESPONSIBLE FOR THE SITE

☐ **Sewage**
- ☐ break in mains
- ☐ pumping station (sewage or chemical)
- ☐ sewage treatment plant
- ☐ other (ponds etc)

☐ **Waste**
- ☐ waste from Council project/facility/activity
- ☐ dumped waste
- ☐ asbestos only

☐ **General**
- ☐ spill/overflow (chemical, fuel, substance etc) *- additional detail required below*
- ☐ vegetation – disturbance / damage
- ☐ general – (heritage, water, wildlife etc)
- ☐ other

Cause
- ☐ blockage
- ☐ mechanical failure
- ☐ electrical failure or power outage
- ☐ rainfall inundation
- ☐ trade waste incident
- ☐ break in main
- ☐ other

DESCRIPTION OF INCIDENT

ACTION TAKEN TO CONTAIN / MANAGE THE INCIDENT

Were photos taken: YES ☐ NO ☐ Were samples taken: YES ☐ NO ☐

DETAILS OF PERSON REPORTING THE INCIDENT

NAME

DATE

PHONE

MOBILE

DEPARTMENT SECTION

PART B

Report to Environmental Incident Hotline
INVESTIGATION

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? YES ☐ NO ☐ NOT SURE ☐
   If "Yes" call 000 immediately.
2. Pose any actual or potential harm to human health that is not trivial? YES ☐ NO ☐ NOT SURE ☐
   - 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?
3. Pose any actual or potential harm to ecosystems that is not trivial? YES ☐ NO ☐ NOT SURE ☐
   - Could the incident flow / impact on a water body or drainage system?
   - Could the incident flow / impact on environmentally sensitive land?
4. Result in actual or potential loss or property damage of an amount over $10,000? YES ☐ NO ☐ NOT SURE ☐

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

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

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

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

ACTIONS REQUIRED BY FIRE & RESCUE

CONTINUES ON REVERSE

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

PHONE

MOBILE

DEPARTMENT SECTION

WATER DIRECTORATE

Chemical Spill and Sewage Surcharge/Spill Notification Letter Templates:

CHEMICAL SPILL IN VICINITY OF PROPERTY

Dear Resident,

This notice is to inform you that there has been a chemical spill in the vicinity of your property.

The cause of this event is being rectified and any contaminated area will be cleaned and disinfected as soon as possible. In the meantime you are requested to avoid any area that may have been contaminated with chemicals.

For further information regarding this matter please contact Snowy Valleys Council on (02) 69 412 555 or for after hours on 0427 470 555.

Yours faithfully,

Steven Pinnuck

Interim General Manager

SEWAGE SURCHARGE/SPILL IN VICINITY OF PROPERTY

Dear Resident,

This notice is to inform you that there has been a sewage surcharge/spill in the vicinity of your property.

The cause of this event is being rectified and any contaminated area will be cleaned and disinfected as soon as possible. In the meantime you are requested to avoid any area that may have been contaminated with sewage.

For further information regarding this matter please contact Snowy Valleys Council on (02) 69 412 555 or for after hours on 0427 470 555.

Yours faithfully,

Steven Pinnuck

Interim General Manager

Tumbarumba Office: Bridge St (PO Box 61), Tumbarumba NSW 2653 • P 02 6948 9100 • tumbaadmin@snowyvalleys.nsw.gov.au
Tumut Office: 76 Capper St, Tumut NSW 2720 • P 02 6941 2555 • tumutadmin@snowyvalleys.nsw.gov.au

Public Works
NSW Water Solutions

Level 14 McKell Building
2-24 Rawson Place
Sydney NSW 2000

www.publicworks.nsw.gov.au