Pollution Incident Response Management Plan
(PIRMP)

Brungle Wastewater Treatment Plant and Reticulation 2024

SNOWY VALLEYS COUNCIL

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

LICENCE NUMBER: 12351

Approved by: Quentin Adams

Position/Title: Manager Utilities & Waste Business Signature: 

Date: 20/05/2024

PURPOSE:

Snowy Valleys Council holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Brungle Wastewater Treatment Plant. 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.

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1. Introduction

Brungle is a small village located about 20 kms northeast of Tumut, having a population of about 90 persons. In 2007 a new Activated Sludge wastewater treatment plant utilization Intermittent Decant Extended Aeration (IDEA) was commissioned. The plant has a design capacity of 140 (EP). The plant is modular in construction and incorporates the following elements. The plant is controlled by PLC/SCADA and monitored by RADTEL telemetry for critical functions. The plant is attended from Tumut usually two to three days a week

The reticulation system consists of a small amount of gravity mains which feeds into a pump station on Adam Street from where it is pumped to the Wastewater Treatment Plant (WWTP). The remainder of the town operates under a Low Pressure Grinder System (LPGS). Each resident has an E-One Unit which consists of a tank and a Grinder pump which pumps the wastewater to the WWTP. These pumps are maintained by Snowy Valleys Council. The Brungle WWTP treats around 6 ML per year which equates to around 16 kL per day. There is little variation between average dry weather and peak wet weather flows.

1.1 EPL Details

This Pollution Incident Response Management Plan applies to Brungle WWTP and Reticulation.

Environment Protection Licence (EPL) Details	
Name of licensee:	SNOWY VALLEYS COUNCIL ABN 53 558 891 887
EPL number:	12351
Premises name and address:	BRUNGLE SEWAGE TREATMENT SYSTEM, BRUNGLE-GUNDAGAI ROAD, BRUNGLE NSW 2722
Company or business contact details	**Name: Steven Pinnuck** **Position or title: |** Interim General Manager **Business hours contact number/s:** 02 6941 2567 **After hours contact number/s: 0429 310 205** **Email:** spinnuck@svc.nsw.gov.au
Website address:	http://www.snowyvalleys.nsw.gov.au/
Scheduled activity/activities on EPL:	Sewage treatment
Fee-based activity/activities on EPL:	Sewage treatment processing by small plants 0-20 ML discharged

For site plans, refer to Section 7.1 Appendix 1 – .

2. Pollution Incident Response Management Plan

Pollution incident response management plans (PIRMPs) are plans all holders of environment protection licences (licensees) are required to prepare in accordance with section 153A of the Protection of the Environment Operations Act 1997 (POEO Act). By preparing and implementing a PIRMP that meets the requirements specified under the legislation, Council will:

- minimise the risk of a pollution incident occurring as a result of their licensed activities, as they would have identified risks and the actions they propose to take to minimise and manage those risks
- have established clear and effective notification, action and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately, including
  - people who may need to be involved in incident responses – including staff at the premises; the Environment Protection Authority (EPA); and other relevant authorities (such as Fire and Rescue NSW, NSW Health and local councils)
  - industrial, commercial and residential neighbours and other members of the community
- have properly trained staff and up-to-date incident management information available to ensure the potential impact of a pollution incident is minimised.

The WWTP and its collection system operate under Environmental Protection Licence (EPL) No. 12351 granted by the NSW Environment Protection Authority (EPA). The licence is renewed annually on 1 June.

2.1 Potential Hazards

During wastewater treatment, chemicals and by-products are produced which, if spilt or incorrectly managed, may contaminate the environment or threaten human health. A register of the chemicals is contained in Section Description and likelihood of hazards.

The potential hazards to the environment include;

- Wastewater overflow (raw or partially treated) – potentially caused by:
  - Storms (lightning/heavy rainfall/wind) causing power failure or infrastructure damage
  - Reticulation blockages
  - Damage to reticulation (contractors or other damage during excavations etc)
  - Infrastructure failure due to age
  - SCADA/Communications failure
  - Excessive flows
  - Mechanical break down
  - Power outage
  - Treatment plant process failure

- Chemical spill – potentially caused by:
  - Tank/storage failure
  - Delivery incident
  - Damage to chemical reticulation
  - Vandalism
  - Inappropriate chemical use
  - Bund failure

A detailed assessment of risks is provided in Section 7.4 Appendix 4

2.2 Incident Response and Contact details

This section details the response requirements in the event of an incident. In all situations:

Pollution incident – person/s responsible

PIRMP activation	**Name of person responsible:** Quentin Adams **Position or title:** Manager Utilities & Waste Business **Business hours contact number/s:** 02 6941 2589 **After hours contact number/s:** 0417 645 862 **Email:** qadams@svc.nsw.gov.au **OR** **Name of person responsible:** Edward Greig **Position or title:** Water & Wastewater Engineer **Business hours contact number/s:** 02 6941 2526 **After hours contact number/s:** 0437 951 365 **Email:** egreig@svc.nsw.gov.au
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company	**Name of person responsible:** Edward Greig **Position or title:** Water & Wastewater Engineer **Business hours contact number/s:** 02 6941 2526 **After hours contact number/s:** 0437 951 365 **Email:** egreig@svc.nsw.gov.au
Managing response to pollution incident	**Name of person responsible:** David Sam **Position or title:** Coordinator Utilities - Works **Business hours contact number/s:** 02 6941 2430 **After hours contact number/s:** 0436 279 959 **Email:** dsam@svc.nsw.gov.au **Or Steven Signor, Senior Team Member Tumut W&WW** **Contact Number BAH : 0409 329 514** **Water / Wastewater On-Call Team 0419 478 335**

The 24 hour emergency number for Snowy Valleys Council is 0427470555

During working hours, these calls are taken by staff on the Snowy Valleys Council Switch. If the call is after hours, the call is redirected to Snowy Valleys Council Duty Officer, who informs appropriate personnel of issues and incidents.

2.2.1 Human health or Safety Incident

If there is immediate threat to Human health or Safety, call triple zero "**000**" and implement the following process:

1. Implement the ***Emergency Work Instruction***
2. If required, evacuate the site. Move to Emergency Evacuation Area
3. Office hour contacts for Council are

Contact	Phone	Mobile
Council administration	02 6941 2555	0427 470 555 (After Hours)
After hours, water & wastewater emergencies		0427 470 555
Director Infrastructure & Works	02 6941 2402	0409 815 603
Manager Utilities & Waste Business	02 6941 2589	0417 645 862
Environmental Health Officer	02 6941 2532	0429 314 050
Coordinator People & Culture (HR)	02 6941 2574	0437 620 028
Public Health Unit Murrumbidgee and Southern Local Health Districts (NSW Health)	02 5943 2044	0428 693 374
NSW Department of Planning, Industry and Environment, (DPIE Water)	02 6024 8854	0427 324 893
NSW DPI, Fisheries	02 6042 4213	0484 907 343

2.1.2 Pollution incident

Pollution incidents posing material harm to the environment should be notified to each 'relevant authority' as defined in section 148(8) of the POEO Act. 'Relevant authority' means:

1. the appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) – the local authority is a local council of an area under the (Local Government Act, 1993)), the Lord Howe Island Board for Lord Howe Island, or the Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council)
2. the EPA, if it is not the ARA – phone Environment Line on 131 555
3. the Ministry of Health via the local Public Health Unit –see www.health.nsw.gov.au/publichealth/infectious/phus.asp (Public Health Act, 1993)

4. the WorkCover Authority – phone 13 10 50
5. the local authority if this is not the ARA
6. Fire and Rescue NSW – phone 000

For details of other contacts that might be required see Section 7.6 Appendix 6 - Additional Emergency Contacts.

In all situations where there is damage and/or loss to private property or a member of the public due to an incident related to this plan contact:

Council's Risk Management Officer **(02) 6941 2513 or 0436 014 129**
Coordinator Safety & Systems **(02) 6941 2410 or 0427 814 411**

The incident response required depends on the type of incident that has occurred. The following is a list of safe work method statements to be implemented in the event of a related incident:

TSC - Chemical Spill Response (MMS code/Reporting Units-115- SWS-AS-03-SPILL)

2.3 Communicating with neighbours and the local community

Impacts on the community due to wastewater distribution and treatment incidents are variable and depend on location, volumes of spills or other factors. Communication methods will be used on a case by case basis and in all situations Snowy Valleys Council will attempt to provide early warning to directly affected premises by phone call or site visit. Early warning is to include details of what the imminent incident is how those affected can prepare and respond, and provide important advice such as avoiding contact and use of affected waterways.

Where early warning is not possible Snowy Valleys Council will provide notification and communication during and after an incident to advise those affected with information, advice and updates. Notification and communication methods will be determined on a case by case basis and the following methods may be used:

- Letter drops
- Warning signs
- Phone calls
- Media releases (radio/television/newspaper/internet/social media as required)
- Site visits/door knocking
- Other methods as the situation requires

In the event of a chemical or wastewater spill into stormwater or waterway, Snowy valleys Council staff is to go to prominent and/or high use areas of the affected waterway and erect signage. The signs are to warn water users of the contamination and advise them to avoid activities such as swimming, fishing, shell fish collection and boating until contamination has cleared. Additionally, if the event occurred or was occurring during dry weather, Snowy Valleys Council staff is to attend popular sites and advise users directly.

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

Regular communication and notification (see Appendix 7) is to be provided until the incident and clean-up of impacted site and affected areas has been complete (e.g. faecal coliforms have returned to background levels). Snowy Valleys Council is to take signs down and advise the public that regular activities can be resumed by (as required):

- Phone calls
- Media releases (radio/television/newspaper/internet/social media as required)
- Letter drops
- Other methods as the situation requires

2.2.1 Incidents at the Brungle Wastewater Treatment Plant

The Brungle WWTP is located on the southern side of the township in farm land with Nimbo Creek to the west. There is nothing onsite that would create an emergency for any neighbours. Additionally, the inflow into this plant and the available storage means that even at peak wet weather flow the potential of an overflow from this plant is low as the plant is located in a sealed bunded hardstand. However, if an incident did occur and any community members or neighbours were affected then the processes listed in Section 2.3 above would be implemented as required.

2.4 Incident Investigation

All emergencies must be investigated. For all other incidents, the manager (with guidance from review personnel) will decide whether an incident investigation will be conducted. When an incident investigation is required, the relevant manager is responsible for:

- Forming the investigation team
- Co-ordinating the investigation

Note: The *Investigation Guideline (SWS-SOP-04)* and Accident and Incidents Document can be used when conducting the investigation.

A de-brief is to be conducted for all emergency incidents. However, the responsible manager may also initiate de-briefs for other incidents where they feel it is appropriate. The ***Incident and Accident Form (SWS-SOP-04-F01)*** can be used to assist this process.

2.5 Pre-emptive actions to be taken

2.4.1 Physical and preventative measures

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. At Brungle WWTP, all chemical storages are bunded to ensure that if the storage fails the pollutant is contained and treatment process bypasses are installed to prevent partially treated wastewater spills due to reticulation issues. Additionally, the reticulation, pump stations, and Brungle WWTP have multiple alarm systems to alert operators of conditions that may result in incidents, which include:

- High level alarms
- Communication failure
- Motor issue alarm
- No flow alarms

In the event that these systems fail, Snowy Valleys Council has portable bypass pumps available.

2.4.2 Preventative monitoring and maintenance

Snowy Valleys Council uses monitoring and preventative maintenance to reduce the potential for incidents at both the WWTP and for the reticulation and pump stations. These separated in the following timeframes:

- Daily
- Weekly
- Monthly to Annually
- Longer term (capital works and maintenance programs)

Daily

The WWTP is to be attended daily and the following inspected:

- Maintenance requirements
- Chemical quantities
- Plant performance data
- Housekeeping issues that requiring attention
- Vandalism and/or thefts
- Issues with bunds
- Check bund valves are closed
- Alarms workings

Weekly

- For the reticulation and associated pump stations staff are to conduct weekly pump station checks using the Snowy Works and Services ***- Sewer Activity Spec - Operate and Maintain Wells (SEWWELLO)***.

Monthly to Annually

The following is to be checked monthly for the reticulation and pump stations:

- Alarm testing – power fail, critical float
- Rain gauges – Electricians

The following is to be checked or conducted every three months:

- All valve operations - exercising, maintenance
- Inlet Valves - exercising, maintenance
- Isolation Valves - exercising, maintenance
- Spray locks with silicone spray and operate locks

The following is to be checked or conducted every six months:

- Backup Batteries - (December)
- Fire Extinguishers
- Odour Beds and Sprinkler System - inspection
- Overflow Plugs - inspection
- Remove grit with suction truck - Vacuum Truck
- Vent Pipes - cartridges and whirly bird - inspection
- Sump Pumps - Dry Well PS's

The following is to be checked or conducted annually:

- Lopping and pruning of trees surrounding PS's

- Painting
- Pump Performance Testing (SCX6 and Draw-down tests)
- RPZ Testing
- Team Training - New Technologies and Upgrades
- CCTV and Jetting for repeat chokes
- Inspection of pipeline easements
- Bund integrity (WWTP)

Other checks include manhole inspection, maintenance, repair and resealing (as required) safety net checks (bi-annually), renewing woodchips and gravel (as required) and inspecting and exercising Overflow Flaps (after heavy rainfall).

2.4.3 Pre-emptive documentation

Reticulation blockages, breaks or distribution issues can result in spills if not acted upon. Therefore the following AS are to be used to address issues before overflows occur:

Sewer Activity Spec – Unblocking Sewer Chokes v6 (SCHKE)
Sewer Activity Spec - Manhole Repairs (MANHOLE)
Sewer Activity Spec – Sewer Dig Up (SEWDG)
Sewer Activity Spec – Replace Sewer Lines (SEWGRAV)
Sewer Activity Spec – Replace Pressure Sewer Line v2 (SEWPRES)
Sewer Activity Spec - Operate and Maintain Wells (SEWWELLO

2.6 Staff training

All staff required to implement this plan and associated documents must have training in its use and be inducted into it. This is to ensure they are aware of the content, processes and requirements of this plan and can competently implement it if necessary. Additionally, relevant staff will be involved in an annual exercise/drill to test the implementation of the plan. In the event of a significant incident, an investigation and debrief will be conducted, documentation updated (if required) and staff will be re-inducted.

All, desktop exercises, drills and incidents are to be registered into Council's Data Works, and training records will be sent to Human Resources and Organisational Development for filing.

2.7 Making Plans available

A copy of each plan will be maintained at the premises to which the relevant licence relates, or where the relevant activity takes place, so that it is readily available to those responsible for its implementation and to an authorised officer on request.
Some sections of the plans must be made publicly available within 14 days after they have been prepared by:

- placing them in a prominent position on a publicly accessible website of the licensee
- providing copies of them, without charge, to any person who makes a written request for a copy if the licensee does not have a website.

A publicly accessible website could include a website established to promote the licensee's activities or products.

The information to be made available to the public:

- must include the procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW

- must include the procedures for communicating with the community described in Sections 3.3.6 and 3.4.2 above
- may be exclusive of any personal information within the meaning of the Privacy and Personal Information Protection Act 1998.

2.8 Testing plans

The plan will be tested routinely at least once every 12 months. The testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. This is also applicable to plans prepared by waste transporters. The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including the

- effectiveness of training
- environmental guidelines
- preparation of pollution incident response management plans

Plans must include details such as:

- the manner in which they are to be tested and maintained
- the dates on which they have been tested and the name of the staff members who carried out the testing
- the dates on they are updated.

Plans must also be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates to assess, in the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

2.9 Implementing plans

If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying out the activity will immediately implement any pollution incident management response that was developed to meet the requirements of the POEO Act.

3. Responsibility

Interim General Manager of Snowy Valleys Council is responsible for the implementation of this Plan.

4. Bibliography

Environment Protection Authority, 2012. *NSW Environmental Guidelines: Preparation of pollution incident response plans.* [Online]
Available at:
http://www.environment.nsw.gov.au/resources/legislation/201200227egpreppirmp.pdf
[Accessed 18 September 2012].

Local Government Act, 1993. *Austlii.* [Online]
Available at: http://www.austlii.edu.au/au/legis/nsw/consol_act/lga1993182/
[Accessed 18 September 2012].

Office of Environment and Heritage, 2012. *Home – Reporting pollution, Protocol for industry notification of pollution incidents.* [Online]
Available at: http://www.environment.nsw.gov.au/pollution/notificationprotocol.htm
[Accessed 18 September 2012].

Protection of the Environment Operations (General) Regulation, 2009. *Legislation NSW.*[Online]
Available a

Protection of the Environment Operations Act, 1997. *Austlii.* [Online]
Available at: http://www.austlii.edu.au/au/legis/nsw/consol_act/poteoa1997455/
[Accessed 18 September 2012]

Public Health Act, 1993. *Legislation.* [Online]
Available at: http://www.legislation.nsw.gov.au/fullhtml/inforce/act+10+1991+cd+0+N
[Accessed 18 September 2012].

Water Administration Act, 0986. *Legislation.* [Online]
Available at: http://www.legislation.nsw.gov.au/fullhtml/inforce/act+10+1991+cd+0+N
[Accessed 18 September 2012].

5. Dictionary

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 (see the POEO Act 1997).

Harm to the environment:

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 (or such other amount as is prescribed by the regulations), 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.

6. Table of Amendment

Amendment	Authorised by	Approval reference	Date
Version 1	V Ridley	463897	16/10/2014
Version 2	V Ridley	259044	24/11/2015
Version 3	E Greig		29/07/2017
Version 4	E Greig		11/09/2017
Version 5	E Greig		22/10/2018
Version 6	E Greig		22/05/2019
Version 7	Q Adams		10/06/2020
Version 8	Q Adams		2/06/2021
Version 9	Q Adams		30/05/2022
Version 9 RB	Q Adams		9/12/2022
Version 10	Q Adams		19/04/2023
Version 11	Q Adams		20/05/2024

Annual PIRMP Test History

Revision	Test Date	Conducted By
Version 4	16.08.2017	Edward Greig
Version 4	11.07.2018	Edward Greig, David Sam, Steve Signor
Version 6	24.06.2019	David Sam, Steve Signor, Edward Greig
Version 7	30.06.2020	David Sam / Steve Signor
Version 8	18.06.2021	David Sam / Steve Signor
Version 9	11.07.2022	David Sam / Steve Signor
Version 10	20.06.2023	David Sam, Steve Signor
Version 11	23.05.2024	Steve Signor/ Mathew Peachey

7. Appendices

- Appendix 1 – Site Plans
- Appendix 2 – Site Chemical Register
- Appendix 3 – Personal Protective Equipment (PPE)
- Appendix 4 – Risk Assessment and actions
- Appendix 5 – Action Plans to minimize harm
- Appendix 6 – Additional Emergency Contacts
- Appendix 7 – Notification Letter Template
- Appendix 8 – Pollution Incident Actions

7.1 Appendix 1 – Maps

The plans include a detailed map (or set of maps) showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, the location of any stormwater drains on the premises, and the discharge locations of the stormwater drains to the nearest watercourse or water body.

Figure 1: Brungle Wastewater Treatment Plant

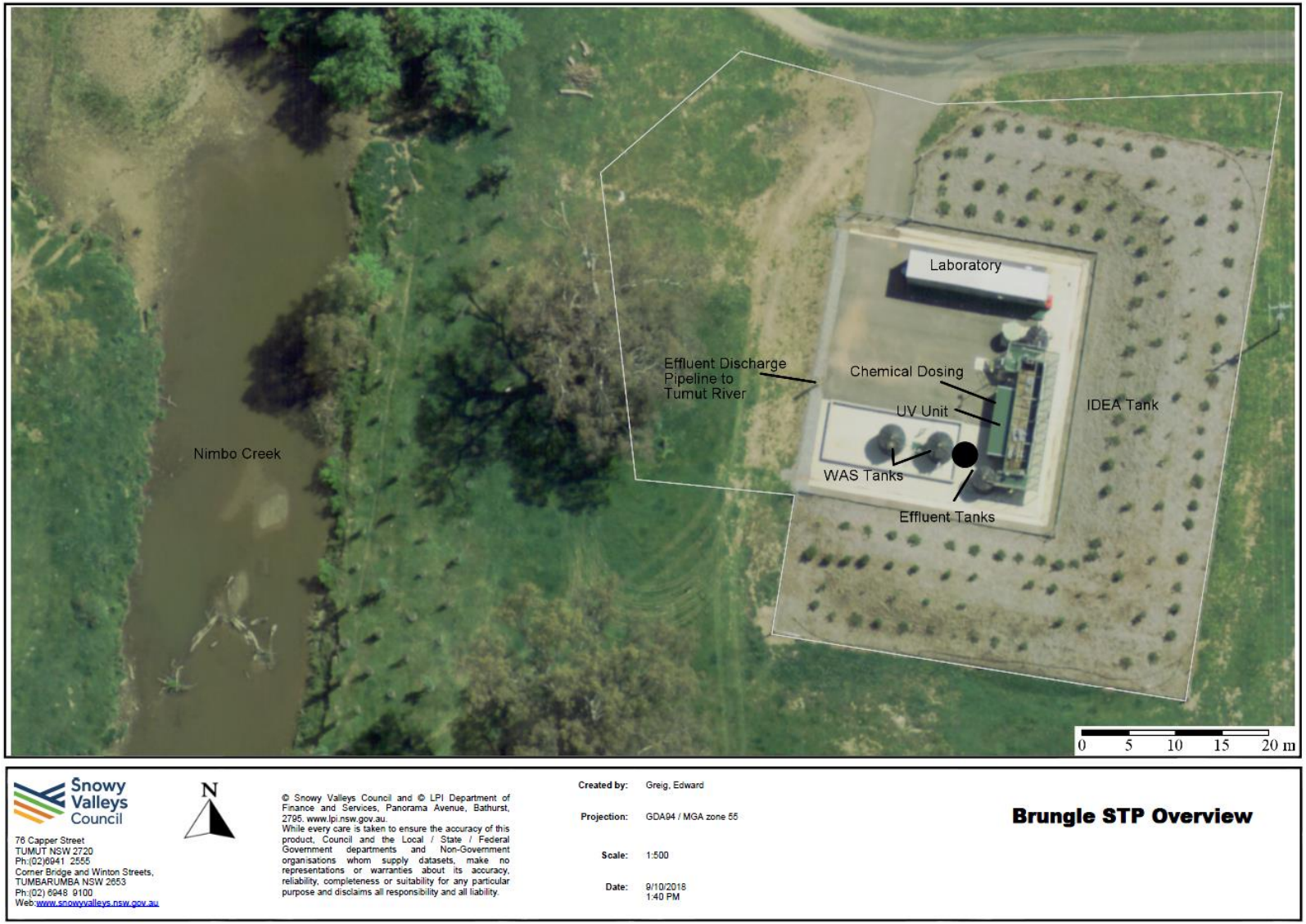
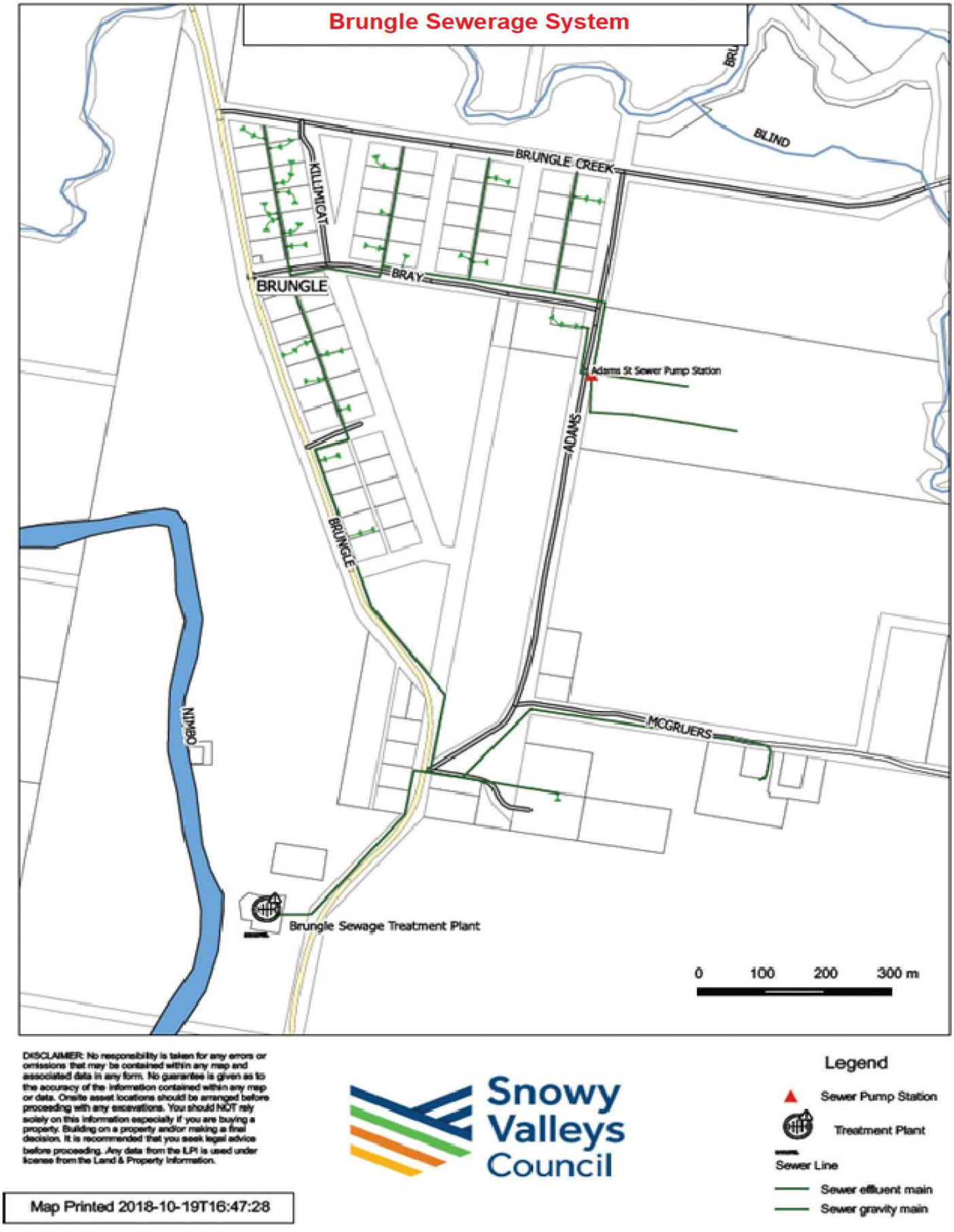


Figure 2: Wastewater Network



7.2 Appendix 2 – Site chemical Register

Inventory of pollutants – Date of register: 31/05/ 2024

Folder Reference	Chemical Name	Manufacturer	Maximum Volume of Chemicals Stored	Location Where Chemical is Stored
1	Aluminium Chlorohydrate (Alchlor)	Hardman Chemicals	1200 litres	Dosing Room
2	DPD Free Chlorine Reagent	HACH	4 x 100ml packs	Laboratory
3	DPD Total Chlorine Reagent	HACH	4 x 100ml packs	Laboratory
4	Mineral Stabiliser	HACH	500 ml	Laboratory
5	Nessler Reagent	HACH	500 ml	Laboratory
6	NitraVer 5 Nitrate Reagent	HACH	4 x 100ml packs	Laboratory
7	PhosVer 3 Phosphate Reagent	HACH	4 x 100ml packs	Laboratory
8	Polyvinyl Alcohol Dispersing Agent	HACH	4 x 50ml packs	Laboratory
9	Epoxy Thinner		2 litres	Store room
10	Paint	Various	4 litres	Store Room
11	Soda Ash	Redox	50 kilograms	Store Room

7.3 Appendix 3 – Safety equipment

This section list the standard Personal Protective Equipment (PPE) items required:

Wastewater Treatment Plant
The following items are to be kept at the Tumut Wastewater Treatment Plant:

- Ear/hearing protection
- Sun screen
- Apron/disposal overalls
- Rubber Gloves
- Safety glasses
- Gumboots
- Steel capped Boots
- First aid kit

Wastewater reticulation response

The following items are to be kept on the wastewater reticulation emergency maintenance vehicle:

- Asbestos kit
- Goggles/eye protection
- Hearing protection
- Apron/disposable overalls
- Rubber gloves
- Gumboots
- Confined space entry equipment
- First aid kit

7.4 Appendix 4 –Risk assessment and incident actions

Actions to be taken during or immediately after a pollution incident

Likelihood

A **IMPROBABLE -** May occur only in exceptional circumstances

B **REMOTE -** Could occur at some time

C **OCCASIONAL -** Might occur at some time

D **FREQUENT -** Will probably occur in most circumstances

E **CONTINUOUS -** Is expected to occur in most circumstances

Refer also to Councils Hazards, Risks and Controls Guidelines

Consequences

1. INSIGNIFICANT - No injuries, minimal level of pollution, Employee grievances dealt with on site, Loss <5% of job cost, service, business failure resulting in delay < 1 week and costs, plant/equipment loss < $1,000

2. MINOR - First aid treatment, limited/localised impact, Employee grievances dealt with by senior management, loss 5-10% of job cost, business failure resulting in delay < 1 month and costs, plant/equipment loss < $10,000

3. MODERATE - Medical treatment & several days off work, significant pollution requiring outside assistance, Employee grievances taken to the union, loss 10-20% of job cost, non-compliance with legislation/Licence conditions, business failure resulting in delay < 3 months and costs, plant/equipment loss < $50,000

4. MAJOR - long term illness/serious injury, significant pollution requiring outside assistance & long term environ damage, threatened industrial action, loss 20-70% of job cost, loss of production capability, order placed on Council by Authorities, business failure resulting in delay < 6 months and costs, plant/equipment loss < $100,000

5. CATASTROPHIC - Death or permanent disability/illness, serious permanent environmental damage, Actual industrial action, loss >70% of job cost, potential prosecution by Authorities, business failure resulting in delay > 6 months and costs, plant/equipment loss > $100,000

Rating

L = Low

M = Medium

H = High

V = Very High

X = Extreme

	Likelihood				
Consequence	A	B	C	D	E
1	L	L	L	M	H
2	L	L	M	H	V
3	M	M	H	V	X
4	H	H	V	X	X
5	V	V	X	X	X

No	*Risk*	*Impact*	*Risk* *LxC = Rating*	*Controls*
Brungle Reticulation				
BRURE1	Wastewater overflow due to heavy rainfall	Land contamination, possibly enter a waterway	C2 = M	▪ Reticulation maintenance and rehabilitation to reduce infiltration and inflows ▪ Spare capacity in pump wells ▪ Monitoring and maintenance ▪ Pre-emptive measures see- Section 2.5 Pre-emptive Measures. ▪ See also 7.5 Appendix 5 - Action plans to minimise harm ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE2	Wastewater overflow due to power failure	Land contamination, possibly enter a waterway	B2 = L	▪ Lightning protection ▪ Back up generators ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE3	Wastewater overflow due to storm damaging infrastructure	Land contamination, possibly enter a waterway	B2 = L	▪ Lightning protection ▪ Site vegetation management to prevent damage to infrastructure ▪ Portable pumps ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE4	Wastewater overflow due to Reticulation blockages or damage	Land contamination, possibly enter a waterway	C2 = M	▪ Reticulation maintenance ▪ Wastewater Jetting program (high pressure cleaning of mains for

				repeat chokes) ▪ Spare capacity in pump wells ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRURE5	Wastewater overflow due to an external persons excavation hitting the wastewater reticulation	Land contamination, possibly enter a waterway	C2 = M	▪ Provide underground service locations to external persons ▪ Telemetry designed to pick up a change in inflows ▪ Vacuum trucks (for clean up) ▪ Portable pumps (for clean up)
BRURE6	Wastewater overflow due to SCADA/Communications failure	Land contamination, possibly enter a waterway	A2 = L	▪ SCADA testing and alarming ▪ Monitoring of SCADA signal issues ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE7	Wastewater overflow due to Infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	B2 = L	▪ Reasonably Young network ▪ Maintenance and renewal programs ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE8	Wastewater overflow due to Mechanical break down/dual pump failure	Land contamination, possibly enter a waterway	B2 = L	▪ Telemetry monitoring ▪ Maintenance and inspection programs ▪ Spare capacity in pump wells ▪ Portable pump to bypass site and vacuum truck to maintain flows

				▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE9	Wastewater overflow from manhole due to blockage / damage / rainfall	Land/water contamination due to wastewater overflow	B3 = M	▪ Reticulation maintenance and rehabilitation to reduce infiltration and inflows ▪ Spare capacity in pump wells and reticulation ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also See also 7.5 Appendix 5 - Action plans to minimise harm ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors
BRURE10	Wastewater overflow from Adam St SPS) due to blockage / damage / rainfall	Land/water contamination due to wastewater overflow	A2 = L	▪ Reticulation maintenance and rehabilitation to reduce infiltration and inflows ▪ Spare capacity in pump wells and reticulation ▪ Pump station Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures. ▪ See also See also 7.5 Appendix 5 - Action plans to minimise harm ▪ See also 7.6 Emergency Contractors – Wastewater pump station – pump out Contractors ▪ High Level Alarm

	Wastewater Treatment Plant			
BRUSTP1	Wastewater overflow (raw) due to heavy rainfall	Land contamination, possibly enter a waterway	B2 = L	▪ Reticulation maintenance to reduce infiltration and inflows ▪ Spare capacity in pump wells ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP2	Wastewater overflow (raw) due to storm (lightning/wind) causing power failure	Land contamination, possibly enter a waterway	B2 = L	▪ Lightning protection ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP3	Wastewater overflow (raw) due to storm (lightning/wind) causing infrastructure damage	Land contamination, possibly enter a waterway	A2 = L	▪ Lightning protection ▪ Site vegetation management to prevent damage to infrastructure ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP4	Wastewater overflow (raw) due to Reticulation blockages	Land contamination, possibly enter a waterway	A2 = L	▪ Reticulation maintenance ▪ Spare capacity in pump wells ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP5	Wastewater overflow (raw) due to damage to onsite reticulation (e.g. during excavations etc)	Land contamination, possibly enter a waterway	B2 = L	▪ Locate services prior to excavations ▪ Appropriate supervision of contractors
BRUSTP6	Wastewater overflow (raw) due to SCADA/Communications failure	Land contamination, possibly enter a waterway	B2 = L	▪ SCADA testing and alarming ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP7	Wastewater overflow (raw) due to Infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	B2 = L	▪ Maintenance and renewal programs ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP8	Wastewater overflow (raw) due to	Land contamination, possibly	A2 = L	▪ Reticulation maintenance to reduce infiltration and inflows

	excessive flows	enter a waterway		▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP9	Wastewater overflow (raw) due to Mechanical break down	Land contamination, possibly enter a waterway	A2 = L	▪ Maintenance and inspection programs ▪ Spare capacity in pump wells ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Pre-emptive Measures.
BRUSTP10	Wastewater overflow (raw) due to Treatment plant blockage	Land contamination, possibly enter a waterway	A2 = L	▪ Gross solid screening
BRUSTP11	Chemical spill due to Tank/storage failure	Land contamination, possibly enter a waterway	B2 = M	▪ Bunding ▪ Alarms ▪ Inspection and maintenance of tanks
BRUSTP12	Chemical spill During delivery	Land contamination, possibly enter a waterway	B2 = M	▪ SWMS ▪ PPE ▪ Supervision during delivery
BRUSTP13	Chemical spill due to Damage to chemical reticulation	Land contamination, possibly enter a waterway	A3 = M	▪ Locate services prior to excavations ▪ Appropriate supervision of contractors ▪ Shut off valves for chemicals
BRUSTP14	Chemical spill due to Vandalism	Land contamination, possibly enter a waterway	A3 = M	▪ Site security fences
BRUSTP15	Chemical spill due to Bund failure	Land contamination, possibly enter a waterway	B3 = M	▪ Bund inspections ▪ Annual bunding tests ▪ Maintenance and renewal

BRUSTP16	Chemical truck incident outside of bunded area	Land contamination, possibly enter a waterway	B3 = M	▪ Only use transport companies with evidence of driver licensing and training ▪ Operator onsite during deliveries (or at minimum direct contact with deliver in exceptional circumstances)

7.5 Appendix 5 - Minimising harm to persons on the premises

To address the risk of wastewater overflows, Snowy Valleys Council has a number of management actions comprising of one or more of the following:

- Further detailed Investigations of very high and extreme risks
- Augmentation of Wastewater Assets to Increase Capacity
- Planned Maintenance of Existing Assets
- Planned Renewal of Existing Assets
- Telemetry Monitoring of Wastewater Pumping Stations
- Continuous Improvement of Wastewater System Operations
- Emergency Response Procedure to Power Failures
- Incident Response Protocol

7.6 Appendix 6 - Additional Emergency Contacts

SNOWY VALLEYS COUNCIL (SVC)	
INTERIM GENERAL MANAGER	6948 9101 / 6941 2567
STEVEN PINNUCK	0429 310 205
DIRECTOR INFRASTRUCTURE & WORKS	02 6941 2402
DUNCAN MITCHELL	0409 815 603
MANAGER TECHNICAL SERVICES	02 6948 9135
GLEN MCGRATH	0458 223 002
MANAGER UTILITIES & WASTE BUSINESS	02 6941 2589
QUENTIN ADAMS	0417 645 862
WATER & WASTEWATER ENGINEER	02 6941 2526
EDWARD GREIG	0437 951 365
MANAGER UTILITIES, OPEN SPACE & FACILITIES	02 6941 2429
BRAD BEED	0427 955 876
COORDINATOR UTILITIES - WORKS	02 6941 2430
DAVID SAM	0436 279 959
WORKSHOP	02 6941 2412
	0408 467 128
WASTEWATER PLANT OPERATOR	02 6944 9095
STEVEN SIGNOR	0409 329 514
ELECTRICIAN	0418 979 173
IT DEPARTMENT ON CALL CONTACT 1	0428 424 493
IT DEPARTMENT ON CALL CONTACT 2	0488 030 843
WASTEWATER PUMPOUT CONTRACTORS	
TOXFREE	1800 429 628
SOUTHEAST WASTE RECOVERY	0428 409 669
CLEANAWAY	1800 774 557
CLEANAWAY OFFICE (ORANGE)	02 96 042 611
A MURRAY & SONS	02 6947 1973
BENNETTS PLUMBING	02 6947 1143
HANDYBIN	
BELLETTES	02 6947 2223

AMBULANCE	000
	131 233
FIRE BRIGADES - TUMUT	02 6947 1202
POLICE STATIONS - TUMUT	02 6947 7199
RURAL FIRE SERVICE	02 6981 4222
DISTRICT MANAGER	0419 460 880
STATE EMERGENCY SERVICES (SES)	132 500
HOSPITALS - TUMUT	02 6947 0800
SERVICE NSW – (ROADS & MARITIME SERVICES - RMS)	132 701
DPIE WATER	02 9338 6600
Mark Bradshaw	0427 324 893
WaterNSW	1800 061 069
TELSTRA EMERGENCY (SERVICE ENQUIRIES)	1300 835 787
TRANSGRID	1800 027 253
Regional Office Wagga Wagga	02 6922 0222
ELECTRICITY (ESSENTIAL ENERGY)	132 080
NATIONAL PARKS AND WILDLIFE SERVICE	02 69 477 000
NSW Environment Protection Authority (EPA)	131 555
NSW HEALTH	02 5943 2044
Tony Burns	0428 693 374
FISHERIES (Dept. Primary Industries)	69 479 028
FORESTRY NSW	69 473 911
RSPCA	66 513311
	0411 785 242
WIRES	02 69 495 999
Snowy Mountains animal rescue Team (SMART)	02 69 491 491
COUNCIL INCIDENTS, HAZARDS & ACCIDENTS	0417 470 555
SafeWork NSW	131 050
Waste Recycling Centre (Valmar)	02 6947 4150

7.7 Appendix 7 – Notification Letter and Incident Reporting Template

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

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? If "Yes" call 000 immediately.	YES ☐	NO ☐	NOT SURE ☐
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 ☐	NO ☐	NOT SURE ☐
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 ☐	NO ☐	NOT SURE ☐
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

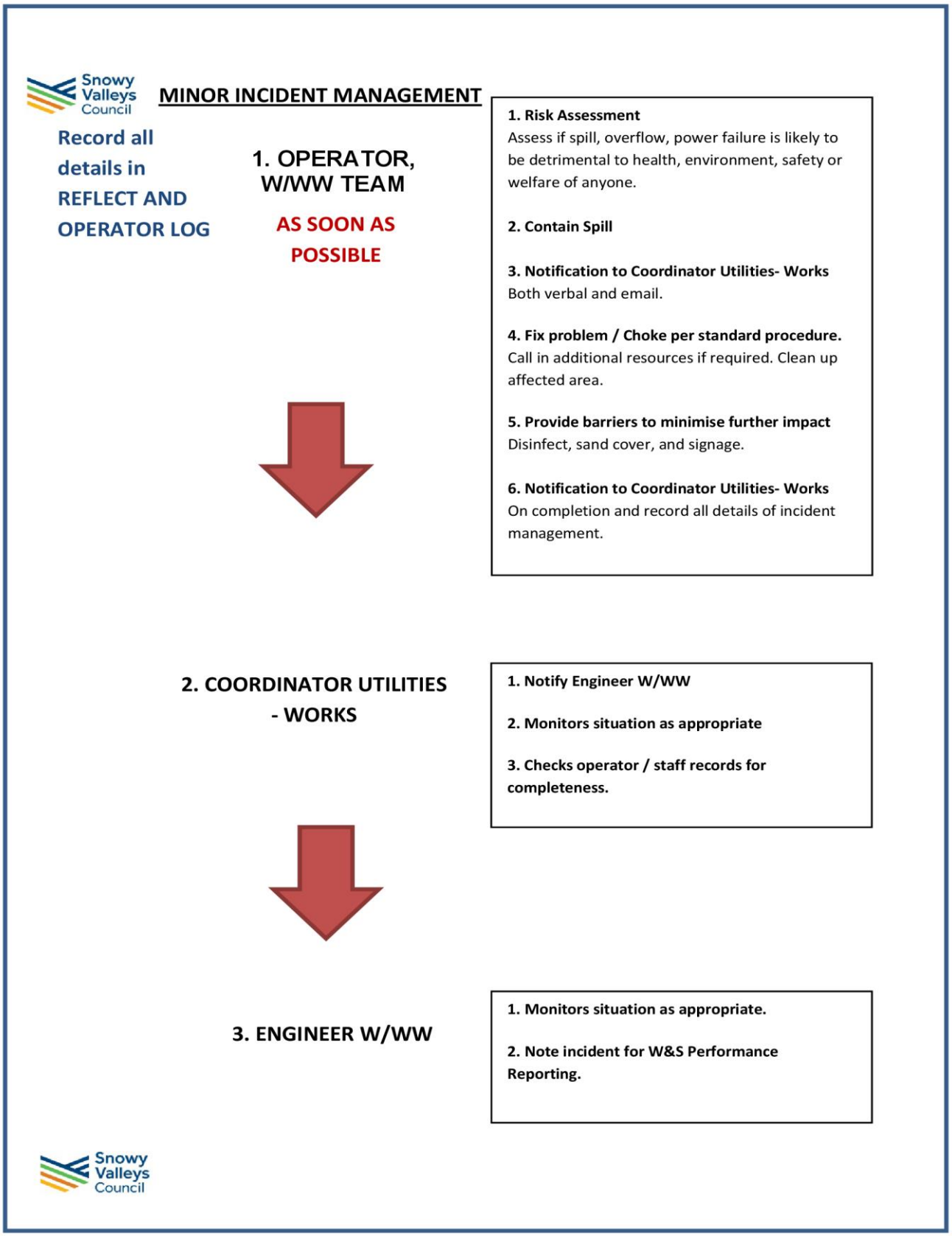
DATE

PHONE

MOBILE

DEPARTMENT SECTION

7.8 Appendix 8 – Pollution Incident Actions



MODERATE INCIDENT MANAGEMENT

Record all details in REFLECT AND OPERATOR LOG

1. OPERATOR, W/WW TEAM

AS SOON AS POSSIBLE

1. Immediately notify Coordinator Utilities-Works Both verbal and email (if nearby).

2. Risk Assessment
Assess if spill, overflow, power failure is likely to be detrimental to health, environment, safety or welfare of anyone.

3. Contain Spill
Arrange for waste tankers, bypass pumps.

4. Fix problem / Choke per standard procedure.
Call in additional resources if required.
Notify neighbours by door knock if overflow likely to impact on health, safety or welfare of anyone.
Clean up affected area.

5. Provide barriers to minimise further impact
Disinfect, sand cover, and signage.

6. Notification to Coordinator Utilities- Works
On completion and record all details of incident management.

2. COORDINATOR UTILITIES - WORKS

1. Immediately notify Engineer W/WW
Both verbal and email (if nearby).

2. Attend Site
Coordinate actions with operator and others.
Arrange sampling if necessary.

3. Checks operator / staff records for completeness.

3. ENGINEER W/WW

1. Immediately notify Manager Utilities & Waste Business and Executive Director Infrastructure.

2. Immediately notify NSW EPA and NSW Health
Monitor situation as appropriate, attend site if necessary. Coordinate with Works Officer - Utilities. Obtain details for records.

3. Final Notification to Manager Utilities & Waste Business, Executive Director Infrastructure, NSW Health and NSW EPA .

4. Prepare Incident Response details for EPA Annual Return.

4. MANAGER UTILITIES & WASTE BUSINESS

1. Notify SafeWork NSW as appropriate.
2. Notify Interim General Manager as appropriate.
3. Liaise with Executive Director Infrastructure and Engineer W/WW as appropriate.

MAJOR INCIDENT MANAGEMENT

Record all details in REFLECT AND OPERATOR LOG

1. OPERATOR, W/WW TEAM

AS SOON AS POSSIBLE

1. Immediately notify Coordinator Utilities-Works and **Engineer Water & Wastewater.**
Both verbal and email (if nearby).

2. Risk Assessment
Assess if spill, overflow, power failure is likely to be detrimental to health, environment, safety or welfare of anyone.

3. Contain Spill
Arrange for waste tankers, bypass pumps.

4. Fix problem / Choke per standard procedure.
Call in additional resources if required.
Notify neighbours by door knock if overflow likely to impact on health, safety or welfare of anyone.
Clean up affected area.

5. Provide barriers to minimise further impact
Disinfect, sand cover, and signage.

6. Notification to Coordinator Utilities- Works
On completion and record all details of incident management.

2. COORDINATOR UTILITIES - WORKS

1. Immediately notify Engineer W/WW
Both verbal and email (if nearby).

2. Immediately notify Emergency Services
Verbal

2. Attend Site
Coordinate actions with operator and others.
Arrange sampling if necessary. Immediately notify and downstream water users.

3. Checks operator / staff records for completeness.

3. ENGINEER W/WW

1. Immediately notify Manager Utilities & Waste Business and Executive Director Infrastructure.

2. Immediately notify NSW EPA and NSW Health, DPIE Water
Monitor situation as appropriate, attend site if necessary. Coordinate with Works Officer - Utilities. Obtain details for records.

3. Final Notification to, Executive Director Infrastructure, NSW Health, NSW EPA and DPIE Water

4. Prepare Incident Response details for EPA Annual Return.

4. MANAGER UTILITIES & WASTE BUSINESS

1. Notify SafeWork NSW
2. Liaise with Executive Director Infrastructure and Interim General Manager (who will liaise with Mayor and Council)
3. Organise media releases as appropriate.

Snowy Valleys Council