POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

WALGETT SEWAGE TREATMENT PLANT (SYSTEM)
Bate Street - Walgett
Revision V4 - 13/4/23

REVISION HISTORY

REVISION	DATE	AUTHOR / REVIEWER	DETAILS
DRAFT 1	10/09/13	LOGICUS Environmental Management	Provided to WSC for comment
FINAL (REV 0)	4/11/13	LOGICUS Environmental Management	Updated with comments from WSC
REV 1	25/08/14	Acting Director Urban Services	Updated contact list
REV 2	30/9/20	John Cavanagh Consulting	Updated Cover Page & Revision History Updated references to Urban Manager Updated Table 7 - Contact Details Insert Appendix 16 Training Plan & Attendee list included
REV 3	7/6/22	John Cavanagh Consulting	Updated Cover Page & Revision History Updated references to Urban Manager Updated Table 7 - Contact Details Insert Appendix 16 Training Plan & Attendee list included
REV 4	13/4/23	John Cavanagh Consulting	Updated Cover Page & Revision History Updated references to Urban Manager Updated Table 7 - Contact Details Insert Appendix 16, 17 & 18 - Training & Testing the Plan & Attendee

CONTENTS

1. ADMINISTRATION

1.1 Purpose

This Pollution Incident Response Management Plan (PIRMP) has been prepared to comply with the obligations introduced in the *Protection of the Environment Operations Act 1997* (POEO Act) which requires the preparation and implementation of a PIRMP.

The purpose of this PIRMP is to assist employees and management of the **Walgett Sewage Treatment Plant and associated infrastructure / operations,** to identify the potential risk of a pollution incident occurring, introduce measures to mitigate that risk AND to give direction in making quality decisions should a pollution incident occur. This PIRMP contains guidance in determining the appropriate pre-emptive actions needed to 'prevent material harm' to the environment.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local council.

1.2 Objective & Scope

It is **Walgett Shire Council's** intent to prevent all foreseeable pollution incidents that might impact on the environment and the safety of employees, visitors & neighbours, through the implementation of standard operational procedures, undertaking routine site activity inspections, regular training of personnel in the implementation of operational procedures and through emphasising & supporting proactive incident prevention reporting.

However, it is recognised that pollution incidents are not totally preventable. Therefore this PIRMP has been developed to achieve the following objectives:

- reduce the likelihood of a pollution incident occurring at the facility through identification of risks and the development of planned actions to minimize and manage those risks.
- ensure comprehensive and timely communication about a pollution incident to all staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as NSW Ministry of Health, WorkCover NSW, and Fire & Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
- ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementation and ensuring that the PIRMP is regularly tested for accuracy, currency and suitability.
- provide guidance on how to respond to an environmental pollution incident and how to record and report such an event.

This PIRMP contains guidance in determining the appropriate actions to take to prevent a pollution incident, injury or property damage and how to respond should a pollution incident occur. The PIRMP also includes provisions for record keeping, testing, reporting and document revision.

1.3 Legislative Context

The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2022 (clause 72). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO Regulation (clause 71).
- Licensees must keep the Plan at the premises to which the Environment Protection Licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act & clause 74 of the Regulation).
- Licensees must test the plan in accordance with the POEO Regulation (clause 75).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan (section 153F, POEO Act).

1.4 Key Terms & Meanings

An understanding and appreciation of the following key terms is considered integral to the successful implementation of this PIRMP.

1.4.1 Pollution Incident

The definition of a pollution incident as defined in the POEO Act dictionary is:

> *'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'.*

1.4.2 Material Harm to the Environment

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'.

1.4.3 Immediate Reporting Requirement

Industry is now required to report pollution incidents 'immediately' to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local Council (**WSC**). 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

1.5 Facility covered by this PIRMP

This PIRMP incorporates activities of Environment Protection Licence (EPL) **L13056**, which references the '**Walgett Sewage Treatment System'** which collectively includes the 'reticulation network' (structures that collect / direct sewage) AND the treatment plant itself.

1.6 PIRMP Distribution

The master copy of this PIRMP is to be maintained by the **Urban Manager (UM)** who will be responsible for revisions of the PIRMP and for the distribution of revised copies to the above mentioned persons and location.

A copy of this PIRMP is required to be kept at the premises to which the relevant Environmental Protection Licence (EPL) relates, or where the relevant activity takes place, so that it is readily available to those responsible for its implementation and to any Authorised Officer upon request.

A copy of this PIRMP is also to be retained by the **Director – Engineering/Technical Services (WSC)**.

1.7 PIRMP Review

The PIRMP is to be reviewed annually by the **Urban Manager (WSC)** in conjunction with relevant Council staff including the **Urban Manager (WSC)** and the **STP Operator in Charge (WSC)**.

When revisions are made to the PIRMP, the revised document will be re-distributed and redundant copies collected and discarded. The date of issue and revision number is to be recorded on the title page of the document for future reference.

As part of the revision process, a Notification of Change Form, (**Appendix 1**), will be provided which must be signed by each responsible party indicating that the party has received a copy of the changes and that the copy of the PIRMP assigned to that party has been updated. This form is to then be retained on file by the **Urban Manager (WSC).**

1.8 PIRMP Training

To ensure that this PIRMP is properly followed in the event of a pollution incident, training programs shall be provided to relevant **Council Employees**. The objectives of the training program shall be as follows:

a) *To ensure that **Council Employees** are knowledgeable of their roles and responsibilities concerning this PIRMP.*

b) *To ensure that **Council Employees** are knowledgeable of the PIRMP's procedures to effect a safe and appropriate response to pollution incidents.*

Council Employees will receive training in the PIRMP appropriate to the level of their expected involvement. The following is the general training program which is to be implemented in support of this PIRMP:

1.8.1 Training Frequency

Council Employees working at the facility will receive training during initial employment orientation / induction and refresher training at least annually.

Additional training will also be provided to employees whenever the PIRMP is changed.

1.8.2 Training Level

All **Council Employees** working at the facility will receive training in the general PIRMP procedures and Standard Operating Procedures related to the PIRMP.

Training shall cover routine pre-emptive inspections, incident discovery and management, (standard operating procedures), notifications, incident response and best practice facility management.

1.8.3 Supervisor Training

The **Urban Manager (WSC)** will receive additional training, beyond that received by Council employees or other site personnel, dealing with actions that are necessary to provide for the safety of employees, contractors, possible site visitors, the protection of facility assets and the management of pollution incidents generally.

1.8.4 Training Competencies

Details of the training competencies achieved by **Council Employees,** relevant to this PIRMP, are provided in **Appendix 2**.

1.8.5 PIRMP Drills & Exercises

To ensure that this PIRMP will meet current conditions and that all involved individuals will respond appropriately, the PIRMP will be tested on an annual basis. The testing will include at least the following:

a) Reaction and accountability of facility personnel; and

b) Adherence to PIRMP procedures.

All drills and exercises of the PIRMP will be documented, indicating the results of the exercise and any problems that were encountered, along with recommendations for PIRMP modifications.

The **Urban Manager (WSC)** will complete a Pollution Incident Exercise Evaluation Form **(Appendix 3)** and maintain copies for review**.**

1.9 Form of PIRMP

As the purpose of this PIRMP is to mitigate the likelihood and to improve the management of pollution incidents and facilitate better coordination with the relevant response agencies and community, this PIRMP must be provided in written form, be available at the subject premises, be able to be provided to an authorised EPA officer on request and available to any person who is responsible for implementing the PIRMP.

1.10 Relationship With Other Emergency & Incident Response Plans

This PIRMP can function as a standalone document, the implementation of which is required to be undertaken to mitigate risk of a pollution incident but also to respond to a likely pollution incident where there is a potential of 'material harm to the environment'.

If other plans, procedures and protocols provide for enhanced, ancillary or complementary actions, then they may and should be implemented concurrently.

2. FACILITY DETAILS

2.1 Location

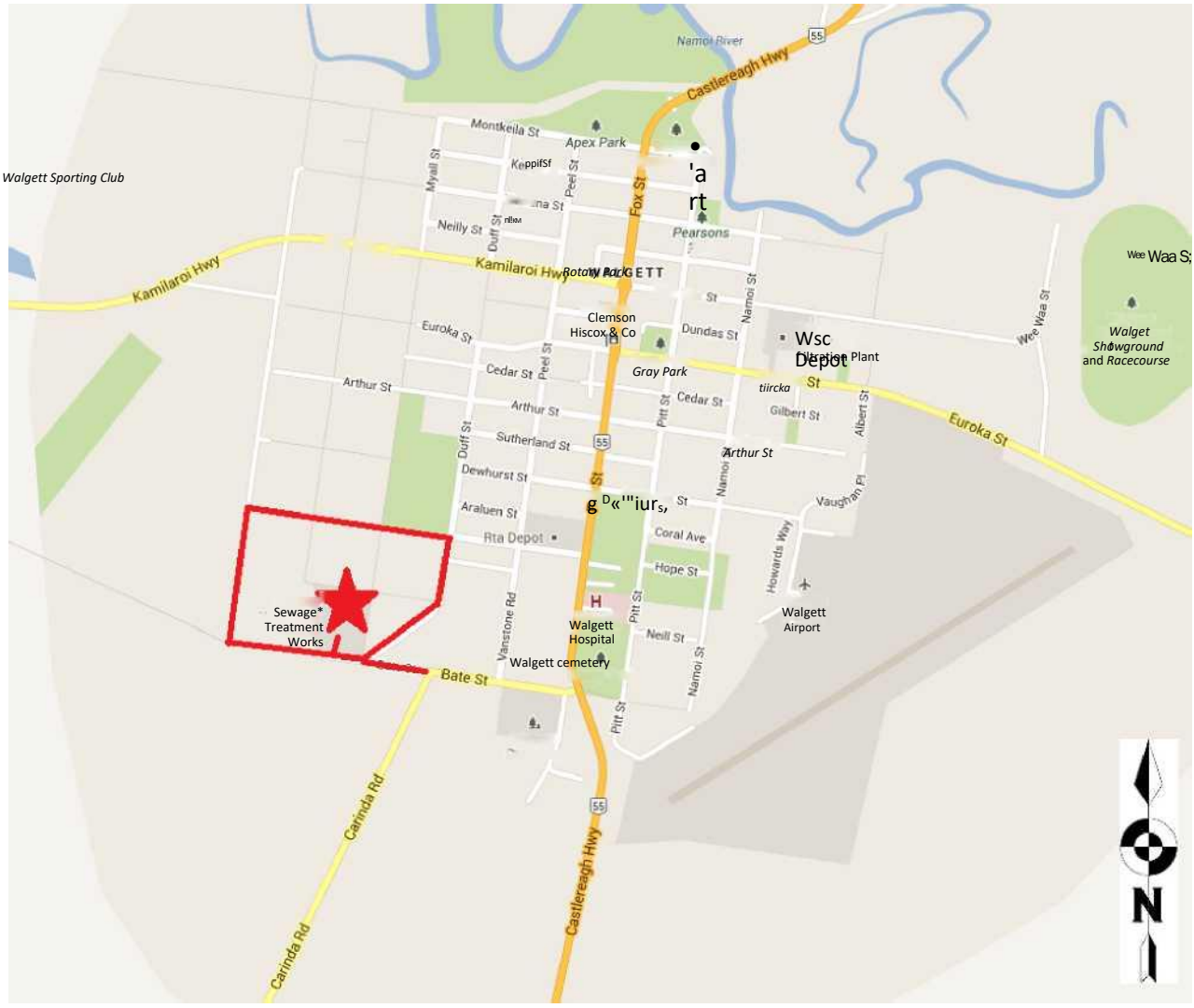
NAME OF THE FACILITY: WALGETT SEWAGE TREATMENT SYSTEM (STP)

ADDRESS: BATE STREET, WALGETT, NSW 2832

PROPERTY DESCRIPTION: LOT 1 DP 34135

OWNER: WALGETT SHIRE COUNCIL

Figure 1 - Location Map:



SITE ACCESS: The 'site' is considered to be the STP which is accessed by travelling west along **Bate Street, (south west of Walgett)**, then via the MAIN ACCESS road (right turn) which leads to the Locked Access Gate at the STP

The STP and site entrance is shown as the 'Main Access' on **Figure 2(a) - General Site Layout.**

Figure 2(a) - General Site Access Layout

VEGETATION: The vegetation surrounding the facility is primarily grassy scrubland with tree stands to the Northeast, West and South. These are generally native species (eucalypts, etc)

TOPOGRAPHY: The topography of the site is described as gently sloping with drainage flow paths to the Northwest (NW and W grassy pasture area) along with a defined drainage channel which drains from the effluent ponds in the North and Northeast boundary toward the Southwest before exiting the site.

2.2 Facility Description

2.2.1 Site Activities

The 'Walgett Sewage Treatment System' operates under an Environmental Protection Licence (EPL) being L13056, issued by the NSW EPA, which relates to 'Sewage treatment processing by small plants'.

Unlike a purely facility based EPL, which normally refers to a specific premises that is defined within clear property / parcel boundaries, the EPL for the STP incorporates infrastructure beyond the STP property / site.

In effect, the EPL includes several functional components:

1. The **Walgett Sewage Treatment Plant**: which includes the effluent treatment structures, control rooms, site office / amenities etc.
2. The **Reticulation system** owned and operated by the licencee that is associated with the 'sewage treatment plant' which effectively means the network of sewer pipes, mains and pump stations etc that direct wastes to the STP; and
3. The **Effluent Ponds / Utilisation Area**: which receive treated effluent waters from the STP before off site discharge occurs.

Figure 2(b) below depicts the arrangement and flowpath relationships of the key EPL components.

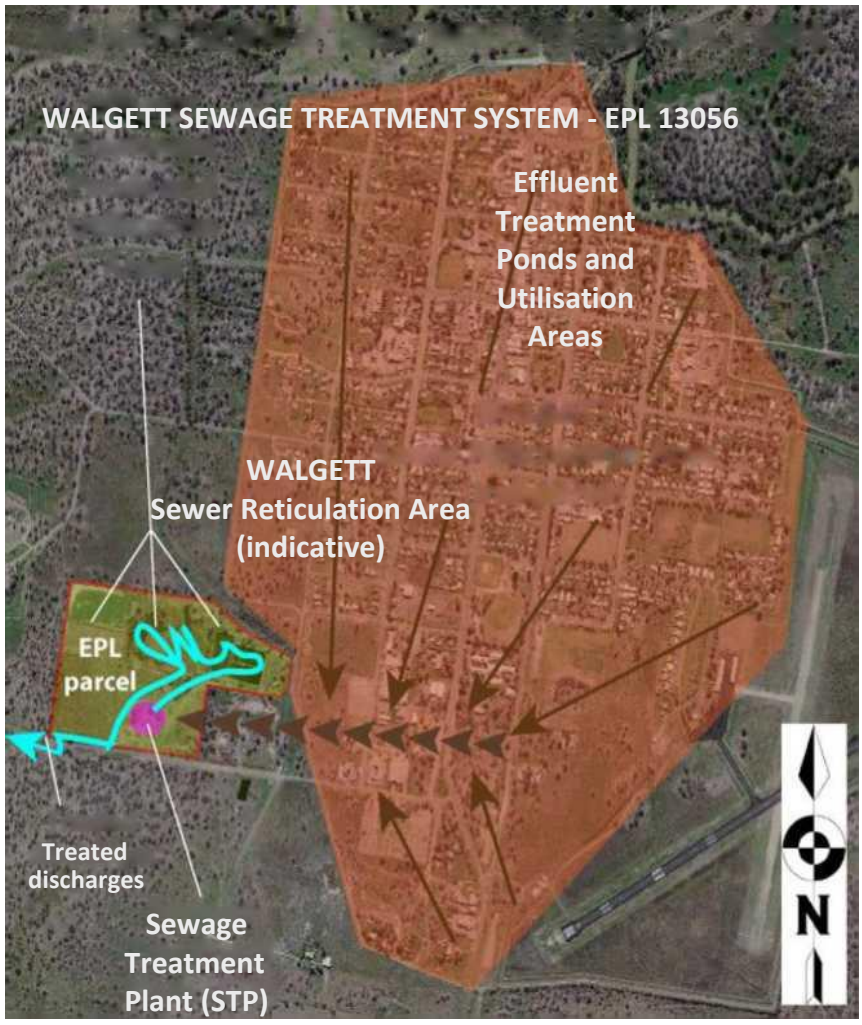


Figure 2(b) - Indicative EPL components - Walgett Sewage Treatment System

For the purposes of this PIRMP, the term '**Walgett Sewage Treatment System'** can be collectively taken to refer to all the components listed above.

The term 'facility' infers the STP, Effluent Treatment Ponds and Utilisation areas collectively. (i.e. All infrastructure located within the EPL referenced parcel). The EPL facility is not open to the general public and WSC staff are infrequently on site at times generally between the hours of approximately 7:00am to 4:00pm weekdays and for limited hours over the weekends and public holidays.

The term STP generally relates to the constructed buildings, filters etc where primary treatment activities occur. The STP itself is entirely surrounded by a raised soil levee which provides relatively good flood protection and atop the levee is fully security fenced, gated and secure. The remainder of the facility is secured with stock fencing only and surrounded by limited flood protection only. Accessibility for the site with the exception of the STP would essentially be considered 'unsecured'.

The external sewer reticulation area has quite varied accessibility but would essentially be considered unsecured (passing through public / private lands).

2.2.2 Site Plan

The Site Services and Infrastructure Plan shows the overall site arrangement, activity areas, the locations of first response equipment in the event of a pollution incident, together with identification of the sources of potential pollutants.

The detailed Site Services and Infrastructure Plan can be located in **Appendix 15 or Figures 2 (a) and (b)** of this document.

Note: The entire reticulation network is not shown in detail due to its overall scale and changing nature / ongoing extension as development of the area progresse

3. POLLUTION INCIDENT PREVENTION & PREPAREDNESS

3.1 Prevention as an Incident Response

WSC is committed to minimising the circumstances under which pollution incidents may occur. Through the use of regularly scheduled meetings, employee and contractor's orientations, training programs, routine inspections of activity areas and the application of standard operational procedures, Council Employees and any contractor's personnel will be able to identify and respond to conditions that might lead to a pollution incident.

Council Employees are instructed, as part of their site inductions and ongoing training, in the steps to report and respond to facility conditions or issues that might give rise to pollution incidents where these conditions/issues are found to exist.

Pre-emptive actions are also undertaken to minimise or prevent any risk of harm to human health or the environment arising from the activities of the operations generally. These are summarised as follows:

Table 1 - Summary of Pre-emptive Actions:

STP & Reticulation Area (generally): • Raw Sewage overflow • Chemical spill • Oil / fuel spills **STP:** • Explosion (Biogas) • Fire **Effluent Ponds / Utilisation Areas:** • Surface water contamination	• Reticulation inspection, monitoring & preventative maintenance to reduce infiltration & inflows, identify system failures (actual or likely), choke point trends etc • System redundancies and bypass processes incorporated in infrastructure design and operational plans • Spare capacity in catchall or bypass pond/s at STP • SCADA testing and alarming • Electrical systems protection / backups / generator connectivity • Quick response / dual crew approach to sewer chokes / blockages or failures • Inflow, weather conditions & environmental monitoring in place • Principally a gravity feed reticulation system (not as susceptible to power outages / pump station issues) • Levee installed around STP to minimise flood water ingress / damage. Along with other actions detailed in SOPs or Checklists (refer Appendices **6 to 12**)

3.2 Register of Potential Pollutants

Potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises together with storage locations are summarised as follows:

Table 2 - Summary of Potential Pollutants

POLLUTANT TYPE/ SUBSTANCE	SOLID, LIQUID, GAS or POWDER	QUANTITY	LOCATION (see Site Plan)	TYPE OF CONTAINMENT	MSDS
Unleaded Fuel	Liquid	<20 litres	Storage Shed 2	Drum / jerry can	Chem watch
Motor Oil	Liquid	<5 litres	Storage Shed 2	Domestic Packaging	
Lab Chemicals, Reagents and cleaning products	Powder / liquids	< 5 kg total	Amenities / Lunchroom Room / Lab & Storage 1 Building	Domestic Packaging	
Paint	Liquid	< 20 litres	Storage Shed 2	Domestic Packaging	
Herbicides / Pesticides	Liquid / Powder	Up to 20 litres & up to 5 kg	Storage Shed 2	Domestic Packaging	
Effluent and waters	Liquid	Varied (>5ML)	Throughout entire 'System'	Earth ponds, drains and reticulation structures	N/A
Grit & Screening	Solid	<2m3 exposed	Grit / Screenings Disposal Area	Buried	N/A
Bio-Gas	Gas	varied	Sub & Surface Structures adjacent to (Nth & Sth sides) and including the Process Control Area	N/A (Passive venting)	N/A

3.3 Nature and Likelihood of Pollution Incidents

Notwithstanding **WSC's** commitment to preventing conditions/issues which might give rise to a pollution incident, it is not possible to negate all situations which might give rise to an incident.

Possible pollution incidents associated with the operation of the Facility are:

- Sewerage overflow or escape from reticulation area OR bypass, failure or flooding of STP.
- Fire within the STP.
- Spill of chemical, fuel, oils or other hazardous materials from containments, tanks etc.
- Biogas build up and explosion.
- Surface water pollution from effluent pond systems or STP discharges / flooding.

Having regard to the nature of the operations of the **Walgett Sewage Treatment Plant**, the level of risk posed by the possible pollution incidents to the environment and the need and priority for management action, is qualified for the facility using the following methodology.

Inherent risk will be assessed by combining the *likelihood* and *consequence* of the identified potential risk. In determining the assessment of the likelihood and consequence, the following rating processes has been utilised.

3.3.1 Likelihood

Determination of the probability or likelihood of environmental harm, damage or loss occurring as a result of a pollution incident using the ranking risk factors by probability methodology contained in the following table.

Table 3 - Incident Likelihood Descriptions

RATING	MEASURE	DESCRIPTION
1	Rare	May occur only in exceptional circumstances.
2	Unlikely	Could occur at some time.
3	Possible	Might occur at some time.
4	Likely	Will probably occur in most circumstances.
5	Almost certain	Is expected to occur in most circumstances.

3.3.2 Consequence

Determination of the consequence of the potential environmental harm, damage or loss using the ranking risk factors by consequence methodology contained in the following table.

Table 4 - Incident Consequence Descriptions

RATING	MEASURE	DESCRIPTION
1	Insignificant	Environmental impact is undetectable
2	Minor	Environmental impact is virtually undetectable.
3	Moderate	Minor (usually reversible) some potential for low level environmental impacts which can be easily managed
4	Major	Major environmental impact which is reversible
5	Severe	Major environmental impact which may be irreversible

3.3.3 Risk Evaluation

Individual evaluation of the management priority for each potential pollution incident using the risk priority matrix presented in the following figure.

Figure 3 - Risk Evaluation Matrix:

Likelihood	Consequences				
	Insignificant	Minor	Moderate	Major	Severe
Almost certain	M	H	H	E	E
Likely	M	M	H	H	E
Possible	L	M	M	H	E
Unlikely	L	M	M	M	H
Rare	L	L	M	M	H

RATING	DEFINITION
LOW	Review consequence and likelihood and manage through routine procedures
MOD	Ensure management system controls risk and managerial responsibility is defined.
HIGH	Ensure system and process controls are such that the risk is as low as is reasonably practicable and that due diligence systems are established so that appropriate management processes can be demonstrated to be in operation.
EXTREME	Risk must be reduced or eliminated. If the risk cannot be reduced from "Extreme", then management must provide continuing assurance that due diligence systems are in place so that appropriate management can be demonstrated.

For the purposes of this PIRMP:

- EXTREME / HIGH risks will be eliminated or managed.
- MODERATE risks will be monitored.
- LOW risks will be accepted.

The Residual risk has been shown by measuring the inherent risk against the assessed effectiveness of the controls. The outcomes of the risk assessment together with the relevant incident control / management action are summarised in **Table 5** following:

Table 5 - Risk Identification & Management Plan

POLLUTION HAZARD / HAZARD (OTHER)	RISK FACTORS	OUTCOME	LIKELIHOOD / CONSEQUENCE (RATING)	PRE-EMPTIVE ACTIONS	REFERENCE	LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING)	INCIDENT RESPONSE ACTIONS REFERENCE
1. ENVIRONMENTAL (a) Sewerage Discharge (Off Site)	Stormwater inflow leads to overtopping	Contamination of adjacent land and / or waterways	Likely / Moderate (HIGH)	Routine reticulation inspection for illegal connections to system, drainage anomalies etc Inflow monitoring Bypass procedures Surcharge point locations generally in low risk areas	Plant & System Design Operational / Maintenance Works Program Checklists (Appendix 14 of the PIRMP)	Unlikely / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 7 (if incident leads to overflow) STP Bypass Emergency Response Plan
	Pump breakdown / pipeline failure	Contamination of adjacent land and / or waterways	Likely / Moderate (HIGH)	Routine inspections. Scheduled maintenance servicing of pump and pump connections Standby pumps and service parts available		Unlikely / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 7 (if incident leads to overflow) STP Bypass Emergency Response Plan
	Chokes, Blockages & structure failure	Contamination of adjacent land and / or waterways	Likely / Moderate (HIGH)	Routine reticulation inspection & maintenance, relining programs, sewer jetting etc		Unlikely / Moderate (MODERATE)	Sewerage Overflow Response Plan
	Electrical Systems / Supply failure	Contamination of adjacent land and / or waterways	Likely / Moderate (HIGH)	Maintain SCADA systems with multiple redundancies / checks / alarms including power loss Emergency generator connectivity to STP		Unlikely / Moderate (MODERATE)	Sewerage Overflow Response Plan

POLLUTION HAZARD / HAZARD (OTHER)	RISK FACTORS	OUTCOME	LIKELIHOOD / CONSEQUENCE (RATING)	PRE-EMPTIVE ACTIONS	REFERENCE	LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING)	INCIDENT RESPONSE ACTIONS REFERENCE
	Effluent pond rupture	Contamination of adjacent land and / or waterways	Possible/ Moderate (MODERATE)	Routine inspections	Plant & System Design Operational / Maintenance Works Program Checklists (Appendix 14 of the PIRMP)	Rare / Moderate (MODERATE)	SOP detailed in PIRMP SOP Appendix 6 SOP Appendix 7 STP Bypass Emergency Response Plan
(b) Fire	Electrical / mechanical equipment overheating, chemical reaction	Combustion creates smoke and oil residues	Possible/ Moderate (MODERATE)	Routine inspections Plant designs not altered without authority Maintenance programs routinely completed Fire protection for critical / high risk infrastructure HAZMAT storage per relevant standards		Rare / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 11 Appendix 12
(c) Chemical Spills	Chemical spill from ruptured or leaking storage containers	Soil / water contamination Creation of volatile / toxic fumes Explosion / fire Contamination of adjacent land and / or waterways	Possible/ Major (HIGH)	Retain minimum quantities on site		Rare / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 8

POLLUTION HAZARD / HAZARD (OTHER)	RISK FACTORS	OUTCOME	LIKELIHOOD / CONSEQUENCE (RATING)	PRE-EMPTIVE ACTIONS	REFERENCE	LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING)	INCIDENT RESPONSE ACTIONS REFERENCE
	Incompatible or incorrect chemical storage	Explosion / fire / fumes release	Possible/ Major (HIGH)	Retain minimum quantities on site	Plant & System Design Operational / Maintenance Works Program Checklists (Appendix 14 of the PIRMP)	Rare / Moderate (MODERATE)	SOP Appendix 9 detailed in PIRMP
(d) Oil / Fuel Spills	Failure of fuel containers or storage tanks	Explosion / fire Contamination of adjacent land and / or waterways Creation of volatile fumes	Possible/ Major (HIGH)	Retain minimum quantities on site		Rare / Moderate (MODERATE)	SOP Appendix 10 & 11 detailed in PIRMP
	Failure of mobile / fixed plant hydraulic lines	Fire Contamination of adjacent land and/or waterways	Possible/ Major (HIGH)	Routine plant inspection and servicing.		Rare / Moderate (MODERATE)	SOP Appendix 10 & 11 detailed in PIRMP

POLLUTION HAZARD / HAZARD (OTHER)	RISK FACTORS	OUTCOME	LIKELIHOOD / CONSEQUENCE (RATING)	PRE-EMPTIVE ACTIONS	REFERENCE	LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING)	INCIDENT RESPONSE ACTIONS REFERENCE
(e) Gas Release (Biogas)	Bio-gas passive or forced ventilation blockage / failure	Explosion / fire Creation of volatile / hazardous fumes	Possible / Major (HIGH)	Fire protection supplied Passive venting adequate Smoking restrictions within STP	Plant & System Design Operational / Maintenance Works Program Checklists (Appendix 14 of the PIRMP)	Rare / Major (MODERATE)	SOP detailed in PIRMP Appendix 11 Appendix 12
(f) Cumulative Pollution (Surface Waters)	Discharge loads to environment	Contamination of adjacent waterways	Possible / Major (HIGH)	Environmental Monitoring and Assessment reviews Management and operational reviews to maximise plant efficiency and discharge quality	Plant & System Design Operational / Maintenance Works Program Checklists (Appendix 14 of the PIRMP)	Rare / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 7
(2) COMPLIANCE (a) Incident Reporting	Noncompliance with statutory reporting	Cautionary Notice Penalty Infringement Notice	N/A	Prepare reports as required	Operational Checklist as provided in Appendix 14 of the PIRMP	N/A	SOP detailed in PIRMP Appendix 4 Appendix 5

POLLUTION HAZARD / HAZARD (OTHER)	RISK FACTORS	OUTCOME	LIKELIHOOD / CONSEQUENCE (RATING)	PRE-EMPTIVE ACTIONS	REFERENCE	LIKELIHOOD / CONSEQUENCE POST CONTROL (RATING)	INCIDENT RESPONSE ACTIONS REFERENCE
(3) WORK HEALTH & SAFETY	Personal injury to staff, maintenance / construction contractors or visitors to the facility	Trauma Lost time Rehabilitation Compensation	Likely / Major (HIGH)	Regular tool box meetings with staff and contractors Safe Work Method Statements prepared and implemented Risk assessments undertaken & Safety plans developed for works Staff training Job and site specific orientation for new staff and contractors Independent audit of all systems of work Emergency and evacuation plans prepared and tested	Established tool box meeting protocols Council's corporate Work Health, and Safety Plan	Unlikely / Moderate (MODERATE)	SOP detailed in PIRMP Appendix 2 Appendix 12

3.4 Incident Preparedness

3.4.1 Response Equipment and Features

The **Walgett Sewage Treatment Plant** has a number of active and passive pollution control / safety devices and equipment that can be used during a pollution incident.

Relevant details of pollution incident equipment and emergency features are provided as follows:

Table 6 - Response Equipment Inventory

EQUIPMENT	LOCATION/S	QUANTITY	MAINTENANCE REQUIREMENTS/STANDARDS
Fire extinguisher	Amenities / Lunchroom Room / Lab & Storage 1 Building Process Control Area	1 1	Six monthly inspections and tagging
Chemical spill kit	Amenities / Lunchroom Room / Lab & Storage 1 Building	1	Weekly Inspection
Fire Blanket	Amenities / Lunchroom Room / Lab & Storage 1 Building	1	Weekly Inspection
First Aid Kits	Amenities / Lunchroom Room / Lab & Storage 1 Building	1	Weekly Inspection
Davit Arm	South side Process Control Area (fixed)	1	Six monthly inspections and tagging

Equipment such as portable fire extinguishers, fire blankets, hose reels and fire hydrants should only be used by persons who are suitably trained and when it is safe to do so. The maintenance of the systems and equipment is to be undertaken in accordance with the standards nominated in the Table above.

3.4.2 Communication System

A telephone system is installed within the **Walgett Sewage Treatment Plant** with this system providing for communication both internally (mobiles etc) and externally except during flood events where the STP becomes isolated / inundated.

In a non flood related pollution incident, the telephone can be used as a means of notifying those individuals/organisations responsible for activating this PIRMP and managing the incident response.

In addition to the telephone system, mobile telephones will be an accepted means of communications.

Council vehicles used in response activities within the **Reticulation network** are equipped with a two way radio system and operators with mobile telephones to enable communication.

Communication mechanisms for neighbouring properties, issuing media releases and providing information on Council's web site are detailed in the Summary of Community Notification & Communication provided in **Table 9** of **Section 4.3.2**

3.4.3 Security

Access to the **Walgett Sewage Treatment Plant** by unauthorised persons and unauthorised activities occurring on the site are controlled by Council site personnel and man proof fencing around the STP.

3.4.4 First Aid Equipment

Suitably stocked and easily accessible first aid kit/s are provided at the facility with locations being clearly signed. First aid kits are also available within Council vehicles

3.4.5 Signs & Labels

Suitable signage indicating the location of incident response equipment & features and the first aid kits will be provided and maintained within the facility.

A list of emergency phone numbers will be clearly displayed at a location within the facility that can be seen by Council Employees and any contractors / visitors.

3.4.6 Funding Arrangements and Support

The cost of any clean up that is undertaken by emergency response agencies and the EPA will generally be recovered from a company (Council) or individual responsible for the pollution incident.

Having regard to the above the following pollution incident funding arrangements are in place:

- Funds within Council's Restricted Reserve/s
- Public liability insurance policies

4. POLLUTION INCIDENT CONTROL & RESPONSE

4.1 Key Facility Incident Management Contact Details

The following is a list of incident response individuals who are responsible for activating the PIRMP together with their notification and communication responsibilities:

Table 7 - PIRMP Contact Personnel:

Name	Position	Contact Details (24 Hours)	Notification / Responsibilities	Communication / Responsibilities
Allan Middleton (STP)	STP Operator in Charge (WSC)	0408 395 947	Emergency Services On-site Contractors Urban Manager (WSC)	Emergency Services Urban Manager (WSC) On-site Contractors
David Ryan	Urban Manager	0419 995 062	Emergency Services On-site personnel	Emergency Services On-site personnel
	Project Officer (WSC)		Emergency Services EPA Ministry of Health WorkCover + Council including Director – Engineering/Technical Services (WSC)	Emergency Services WSC site personnel Urban Manager (WSC) On-site Contractors
Bob Stephen	Director – Engineering/Technical Services (WSC)	0400 861 920	General Manager & Directors	EPA & Lead Agencies Media& Ministries within Delegations
Hugh Percy	Acting General Manager (WSC)	026 828 6106	Mayor & Councillors	Media, Councillors & wider Community

The above details are to be verified annually and updated whenever a change in personnel or responsibility has occurred.

4.2 Key Incident Contact Details

The following is a list of incident response individuals and organizations that may be needed during a pollution incident.

Table 8 - PIRMP Emergency Agency Contacts:

ORGANISATION	CONTACT NAME	CONTACT DETAILS
Fire & Rescue NSW	Duty Officer	**000** **1300 729 579**
NSW Police Force	Duty Officer	**000** **02 6732 9799**
Ambulance Service of NSW	Duty Officer	**000** **131 233**
Walgett Hospital	Reception	**02 6828 6000**
Environment Protection Authority (EPA)	EPA Environment Line	**131 555**
	Dubbo Office	**02 6883 5330**
Office of Environment & Heritage (NP&WS)	Parks & Wildlife Regional Office	**(02 6792 7300** **(**Narrabri) **02 9873 8500**
WorkCover Authority	Duty Officer	**131 050**
Department of Primary Industries (NSW Fisheries)	Reception	**1300 550 474**
POISONS Information	Duty Officer	**131 126**
NSW Ministry of Health	Reception	**(08) 8080 1499** (Broken Hill) **02 9391 9000**
Department of Families & Community Services	Reception	**1800 079 098**
State Emergency Service (SES)	Duty Officer	**132 500**
Roads & Traffic Authority	Reception	**132 213**
Bureau of Meteorology	General Information	**1300 659 218**

This list is to be verified at least annually and updated whenever an organization advises that a change has occurred.

4.3 Incident Notification and Communication

*Note: For the purposes of this section, the location of an incident will determine the individual who is the '**relevant supervisor**' and is responsible for the actions required in each clause. For clarity the '**relevant supervisor**' for incidents within the:*

- ***STP** is the **Sewage Treatment Plant Operator in Charge (WSC)***
- ***Reticulation network** is the **Water & Sewerage Maintenance Supervisor (WSC)***

4.3.1 Incident Notification

In order to provide for the safety of employees, contractors, visitors and the wider community, along with ensuring appropriate pollution incident response, it is essential that early warning and notification of pollution incidents are made so that incident response procedures can be implemented and incident response organisations notified of the situation.

The prompt notification of an incident can often greatly assist in ensuring that the risk of injury, death, damage or environmental harm is minimized.

In this regard the following incident notification procedures are to be implemented:

4.3.1.1 Small Area / Minor Incidents

Incidents such as small chemical spills or individual medical emergencies will generally not require the notification of incident response agencies. However, it will be the general practice that **ALL** incidents will be notified immediately by the **relevant supervisor** to the **Urban Manager (WSC)** so that an assessment of the level of response required can be made AND if a notification to one / all agencies is required.

The mobile telephone contact will be the preferred means of reporting such incidents.

An incident report notification form, included as **Appendix 4**, is to be completed and forwarded to the **Urban Manager (WSC)** for any minor incident or event.

4.3.1.2 Major Incident

A major incident is *where material harm to the environment is caused or threatened.*

Where a major incident occurs, the **Urban Manager (WSC)** is to **immediately** implement the pollution notification protocol included as **Appendix 5.**

Importantly **Appendix 5** requires the immediate notification of:

EPA	131 555
Ministry of Health via the local Public Health Unit	(08) 8080 1499
WorkCover	13 10 50
Council (Environmental Services)	6778 6300
Fire & Rescue NSW (if not called for initial emergency response)	1300 729 579

In addition to the immediate notification of any major pollution incident, an incident report notification form, (refer to **Appendix 4**), is to be completed and forwarded to the **Director – Engineering/Technical Services (WSC)**.

4.3.2 Community Notification and Communication

Communicating with neighbours and the local community is an important element in managing the response to any pollution incident.

In this regard the following notification and communication action plan will be applicable to a **MAJOR** pollution incident at the **Walgett Sewage Treatment Plant** or the associated **reticulation network.**

The following action plan has been based upon the pollution incident risk assessment included in **Section 3.3** of this PIRMP.

Note:

*WSC observes the legislative definition of a 'pollution incident' and notification protocols but may choose to implement parts of the Communication Action Plan (for neighbours and agencies) for lesser level incidents if there is merit in doing so (general courtesy, commitments to specific neighbours / complainants etc). There is no obligation to notify and the decision will be made by the **Urban Manager (WSC)** on a case by case basis.*

Table 9 - PIRMP Community Notification & Communications Plan:

NATURE OF INCIDENT	IMPACT ON COMMUNITY	NOTIFICATION REQUIREMENTS	RESPONSIBILITY	NOTIFICATION MECHANISM / TOOLS	KEY MESSAGE
Sewerage overflow ***(Reticulation network)***	Local impact, ranging from MINOR to SEVERE depending on the severity of discharge	EPA (if pollution incident defined in PIRMP - apply notification protocol in Appendix 5)	Urban Manager (WSC)	Phone call to EPA Environment Line followed by a written report	Assessment of severity Type & quantity of material involved Explanation of what happened Date and time of incident Response actions taken
		Occupiers of neighbouring directly impacted properties	As above	Doorknock / leaflet drop to directly impacted properties	Refrain from contact with spill / exclude children / animals from spill
		Local Community / Media	Director – Engineering/Technical Services (WSC)	Information displayed on Council's web site	Strategy for prevention of recurrence

NATURE OF INCIDENT	IMPACT ON COMMUNITY	NOTIFICATION REQUIREMENTS	RESPONSIBILITY	NOTIFICATION MECHANISM / TOOLS	KEY MESSAGE
STP Sewage discharge (off site)	Local impact, ranging from MINOR to SEVERE depending on the severity of discharge	EPA (if pollution incident defined in PIRMP - apply notification protocol in Appendix 5) Occupiers of neighbouring downstream properties (see Appendix 13 for Communication Recipients Schedule) Local Community / Media	Urban Manager (WSC) Director – Engineering/ Technical Services (WSC)	Phone call to EPA Environment Line followed by a written report Phone call or doorknock / leaflet drop to occupiers of impacted neighbouring downstream properties Signage on recreational waters where human health risk likely Information displayed on Council's web site Media release	Assessment of severity Type & quantity of material involved Explanation of what happened Date and time of incident Response actions taken Refrain from contact with spill / exclude animals and pets from spill Actions by WSC / required from residents Strategy for prevention of recurrence
Fire (STP)	Local impact, ranging from MINOR to SEVERE depending on the severity of the fire	EPA Occupiers of neighbouring properties (see Appendix 13 for Communications Recipients Schedule) Local Community / Media	Urban Manager (WSC) Director – Engineering/ Technical Services (WSC)	Phone call to EPA Environment Line followed by a written report Phone call or doorknock to occupiers of impacted neighbouring properties Information displayed on Council's web site	Date and time of incident Response actions taken Type of fire Agency responding Close windows / doors Strategy for prevention of recurrence

NATURE OF INCIDENT	IMPACT ON COMMUNITY	NOTIFICATION REQUIREMENTS	RESPONSIBILITY	NOTIFICATION MECHANISM / TOOLS	KEY MESSAGE
Chemical / Hazardous materials spill or release (resulting in off site discharge or impact)	Local impact, likely to be MINOR	EPA Occupiers of neighbouring properties (if impacted) (see Appendix 13 for Communications Recipients Schedule) Local Community / Media	Urban Manager (WSC) Director – Engineering/ Technical Services (WSC)	Phone call to EPA Environment Line followed by a written report Phone call to occupiers of impacted neighbouring properties or doorknock / leaflet drop Media release / Information displayed on Council's web site	Date and time of incident Response actions taken Type of Spill Agency responding Refrain from contact with soil / water, close windows and doors etc Strategy for prevention of recurrence
Oil / fuel spill (off site discharge)	Local impact, likely to be MINOR	EPA Occupiers of neighbouring properties (if impacted) (see Appendix 13 for Communications Recipients Schedule) Local Community / Media	Urban Manager (WSC) Director – Engineering/ TechnicalServices (WSC)	Phone call to EPA Environment Line followed by a written report Phone call to occupiers of impacted neighbouring properties or doorknock / leaflet drop Media release / Information displayed on Council's web site	Date and time of incident Response actions taken Type of Spill Agency responding Refrain from contact with soil / water Strategy for prevention of recurrence

NATURE OF INCIDENT	IMPACT ON COMMUNITY	NOTIFICATION REQUIREMENTS	RESPONSIBILITY	NOTIFICATION MECHANISM / TOOLS	KEY MESSAGE
Explosion (e.g. Biogas)	Local impact, ranging from MINOR to SEVERE	EPA Occupiers of neighbouring properties (see Appendix 13 for Communications Recipients Schedule) Local Community / Media	Urban Manager (WSC) Director – Engineering/ Technical Services (WSC)	Phone call to EPA Environment Line followed by a written report Phone call to occupiers of impacted neighbouring properties (if more than noise only impact) Media release / Information displayed on Council's web site	Assessment of severity Agency responding Date and time of incident Type of release Stay indoors & close doors windows, re-circulate or close ventilation etc Strategy for prevention of recurrence

*Note: For the purposes of this section, the term 'facility' refers to the STP. Should a significant sewer overflow impact a residence property within the reticulation area, WSC may choose to temporarily **relocate** occupant/s as the situation requires.*

4.4.1 General Requirements

Most MINOR pollution incidents will not require the evacuation of all or in most instances even part of the facility. However, it is acknowledged that any MAJOR incident may require the facility to be evacuated.

In the event of a **MAJOR** incident evacuation of Council Employees, any contractor's & staff and visitors is of the utmost importance.

In order to achieve a safe and timely evacuation, it is critical that an early warning of the pollution situation be communicated and action implemented to remove Council Employees, contractor's staff and visitors from the hazard area.

In this regard the standard operating procedures applicable to Facility Evacuation, refer to **Appendix 12**, must be implemented once a decision is made to evacuate the facility.

Whilst the need for evacuation will be dependent upon the nature and scale of an incident it is of primary importance that personnel or public health is not put at risk at anytime during a pollution incident. The decision to evacuate (in part of full) is to be made by the **Chief Warden** (generally this would **STP Operator in Charge (WSC)** or other **most senior staff member at the site**) and supported by personnel OR as directed by a responding Emergency Service.

4.4.2 Stages of Evacuation

There are 2 stages of evacuation that are applicable to the facility being;

- Stage One: Immediate Area - The evacuation of persons in immediate danger.
- Stage Two: Total Facility - A complete evacuation of the Facility by all people.

In the event of a Total Facility Evacuation, the Facility is not to be re-entered unless instructed to do so by the **Urban Manager (WSC)** OR as directed by a responding Emergency Service.

The **Chief Warden** is responsible for prioritising the order in which people are evacuated from the site of the incident. Generally the following priorities apply:

- Ambulatory
- Semi-ambulant (people requiring some physical assistance)
- Non-ambulant (people who need to be physically moved or carried)
- Aggressive, violent or resistive people.

The above priority for evacuation is for guidance only, the emergency may dictate otherwise.

Where a person refuses to comply with a direction given by the **Chief Warden** the following action is to be initiated:

- Ensure that the person has been clearly advised that they are required to evacuate the facility because of an emergency situation that maybe life threatening.
- Notify the Officer-in-Charge of the attending Emergency Service.

4.4.3 Mobility Impaired Persons

A register is to be maintained of site personnel who may have a permanent or temporary disability that would impeded their ability to self evacuate if required.

A staff member who works with a person with a disability shall be appointed as that person's carer during an emergency. The procedures for assisting mobility-impaired persons should be discreetly discussed with the individual concerned.

All staff should be trained in methods of assisting mobility-impaired persons during an emergency.

4.4.4 Evacuation Assembly Areas

The facility has a designated **primary** evacuation assembly point.

In the event of an incident requiring the evacuation of the facility, all Council Employees, any contractor's staff and visitors are to immediately leave the facility by the designated route and report to the designated primary evacuation point.

Should the primary evacuation point be in a hazardous area or is unsuitable due to the nature of the threat, evacuees will then be directed to proceed to the designated secondary evacuation point.

On arrival at the designated evacuation assembly point all persons will remain until the **Chief Warden** has determined the status of all personnel and;

- accounted for all, or
- prepared a list of names and / or numbers of missing personnel or visitors and the location last seen

For the purposes of this PIRMP the following Evacuation Assembly Points are applicable:

Primary Evacuation Point is at the **MAIN ENTRY** to the **Walgett Sewage Treatment Plant** where the **"Evacuation Muster Point"** sign is located.

Secondary Assembly Point may be selected for egress from the site via a path to be determined by the Chief Warden, as the situation permits. This may be necessary where smoke movement is directly toward the primary evacuation point (as an example)

The Site Services and Infrastructure Plan in **Appendix 15** shows the location of the Primary assembly point.

4.4.5 Post Evacuation Assembly Point

Once the facility has been evacuated to the Primary or Secondary Evacuation Assembly Point and the presence of personnel and visitors confirmed, arrangements will be made by the **Urban Manager (WSC)** for Council Employees and contractor's staff to be transported / moved to a Post Evacuation Assembly Point which may, depending on time of day etc, be the **Council Offices** in **Fox Street Walgett**.

Incident debriefing and incident investigation will be undertaken at the Post Evacuation Assembly Point. Further management instructions will also be provided.

5. POLLUTION INCIDENT RESPONSE PROCEDURES

Appendices No 6 to 12 of this PIRMP contain instructions, (Standard Operating Procedures - SOP's), for facility employees / contractor's staff about actions to be taken for personal safety, and the procedures that are to be implemented to help guide management efforts during a pollution incident, such as:

- Sewage discharge (off-site) from STP or Reticulation network
- Effluent discharge (off-site) from STP
- Fire at STP
- Chemical spill / release to atmosphere
- Oil / fuel spill
- Biogas explosion at STP

6. POST POLLUTION INCIDENT ACTIVITIES

This section of the Pollution Incident Response Management Plan identifies actions to support Council and/or contractor's staff following a pollution incident and activities necessary to restore operations at the **Walgett Sewage Treatment Plant and associated reticulation network.**

*Note: For the purposes of this section, the location of an incident will determine the individual who is the '**relevant supervisor**' and is responsible for the actions required in each clause. For clarity the '**relevant supervisor**' for incidents within the:*

- ***STP** is the **Sewage Treatment Plant Operator in Charge (WSC)***
- ***Reticulation network** is the **Water & Sewerage Maintenance Supervisor (WSC)***

6.1Recovery Operations

The recovery of facility operations and services will depend on the extent of damage suffered by the facility.

The **Urban Manager (WSC)**, in collaboration with the **Director – Engineering/Techncial Services (WSC)** will need to prioritise activities that can be accomplished with available staff and resources.

Immediately following the emergency phase of an incident, the **Urban Manager (WSC)** will develop an operational recovery plan.

A pollution incident must be investigated as soon as possible following its occurrence. The investigation is designed to determine why the incident occurred and what precautions can be taken to prevent a recurrence.

The **Urban Manager (WSC)** is responsible for ensuring that an incident investigation is conducted following all pollution incidents that occur at the facility.

6.2 Incident Investigation (After Action Review)

6.2.1 Small Incidents

For small incidents, the **relevant supervisor** will normally conduct the investigation.

6.2.2 Major Incidents

For major pollution incidents where material harm to the environment is caused or threatened statutory authorities and emergency response agencies will generally be involved in conducting the investigation.

The **Urban Manager (WSC)** and **Director** - **Engineering/Techncial Services (WSC)** will assist the authorities as needed.

6.3 Documentation

Documentation of response activities is of critical importance following a pollution incident. All records and forms used during the incident to document activities must be retained for future reference.

Following a pollution incident or emergency situation, the **Urban Manager (WSC)** will have the responsibility for collecting all records and forms used during the incident. These will be used for several purposes, such as incident investigation, insurance claims and potential legal actions.

The **Urban Manager (WSC)** must prepare a report documenting activities that took place during a major pollution incident.

The report of the **Urban Manager (WSC)** and all related documentation will be submitted to the **Director - Engineering/Techncial Services (WSC)** for review and necessary follow-up actions.

The **Director** - **Engineering/Techncial Services (WSC)** will make any necessary follow up reports to the **EPA or other Agencies.**

6.4 Incident Impact Assessment

Following an incident, an assessment of impact that has occurred to the facility, the environment and equipment must be conducted.

The major goal of this assessment will be to determine the extent of damage to facilities and/or the environment resulting from the incident, and identify repairs or restoration that must be initiated to minimise further damage and restore the facility for operational use or to rehabilitate the environment.

The **Director - Engineering/Techncial Services (WSC)** will have the primary responsibility for conducting the damage assessment following an incident.

Assistance will be obtained as needed from facility employees and outside organisations, such as ecologists, engineers and clean up contractors.

6.4 Incident Debriefing

The purpose of incident debriefing is to inform employees about any hazards that may still remain on the facility property following the incident and to identify unsafe conditions that may still exist.

6.5 After Action Review & PIRMP Update / Amendment

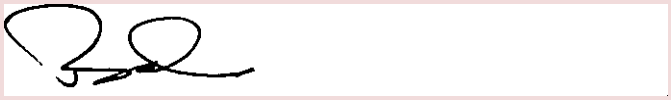
This will occur **within 30 days** of any pollution incident.

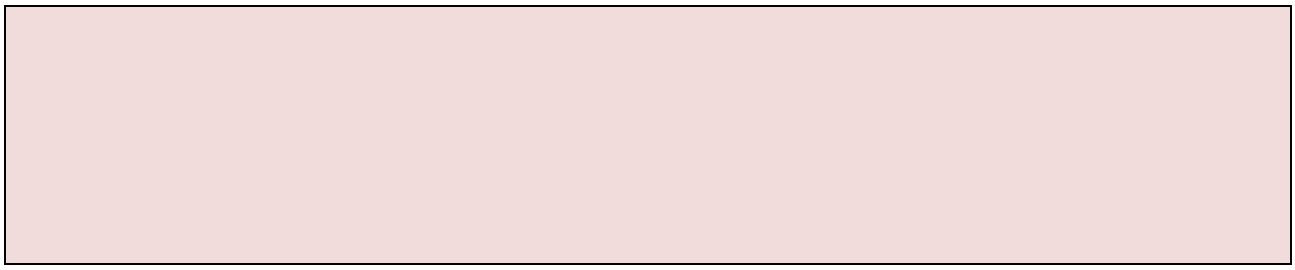
The After Action Review will analyse the actions that took place during the pollution incident (both good and bad) and will seek to identify opportunities to improve the effectiveness of the PIRMP, through Prevention, Preparation, Response and Recovery procedures in place for the facility.

The AAR findings will produce Actions to amend, modify or may determine no change requirements are necessary for the PIRMP.

END

APPENDIX 1: **PIRMP AMENDMENT NOTIFICATION FORM**

Following a review of the Pollution Incident Response Management Plan that was conducted on XXXX the plan has been updated.		
DISTRIBUTION • Master copy • Site copy • **Director Engineering/Technical Services (WSC)** copy		**DATE SENT / ISSUED:**
PAGE NUMBER	**PIRMP SECTION**	**DESCRIPTION OF CHANGE**
All	Entire document	Updated Cover Page & Revision History Updated references to Urban Manager Updated Table 7 - Contact Details Insert Appendix 16, 17 & 18 - Training & Testing the Plan & Attendee
MANAGEMENT AUTHORISATION: **DATED:**		
I acknowledge receipt of the amendments to this PIRMP and have incorporated these into the document for which I am responsible. **SIGNED:**  DATED: 17th APRIL 2023 **POSITION**: Director Engineering / Technical Services		



APPENDIX 2: STAFF & CONTRACTOR TRAINING

PURPOSE AND SCOPE:

To ensure the safe and effective operations management at the ***Walgett Sewage Treatment Plant and Reticulation network***, it is essential that all relevant staff receive training appropriate to their position, duties and level of responsibility.

The purpose of this procedure is to outline the minimum training requirements which are applicable to staff involved in these areas of operation.

PROCEDURE/STANDARD:

Staffing and training requirements shall be adequate to enable proper management and service delivery

Staff will undergo a variety of training to ensure an adequate level of skill and education is possessed to enable all tasks and activities to be carried out successfully. Training will be conducted in house, on the job or by external providers.

The guidance for specific training programs that are integral to the operation of Council's facilities is described below.

PROGRAM A - SITE ENVIRONMENT INDUCTION:

Key points to be covered in this program may include:

- environmental impacts of the facility
- pollution incident response
- hours of operation and site management
- environmental mitigation measures and controls
- record keeping and reporting
- evacuation procedures

This training would generally be provided by the ***Urban Manager (WSC)*** when new staff / contractors commence at a site. Ongoing "on the job" training will also be necessary.

PROGRAM B - FIRE FIGHTING

Key points to be covered in this program may include:

- Types of fires (e.g. oil, electrical)
- Determining responsibilities in the event of a fire (staff/fire brigade)
- Procedures for extinguishing fires
- Types/location and maintenance of fire fighting equipment
- Prevention of fires
- Procedures for communication in the event of fire

This training would be undertaken in the form of a toolbox talk and may include practical demonstrations. The training would be prepared and delivered by suitably qualified personnel (internal or external). Input may also be provided by officers of the local NSW Fire & Rescue Brigade or NSW Rural Fire Service

PROGRAM C - HAZARDOUS SUBSTANCES & DANGEROUS GOODS HANDLING

Key points to be covered in this program may include:

- Use and interpretation of Material Safety Data Sheets
- Identification of hazardous materials
- Handling of hazardous materials
- Labelling of containers
- Storage and transport of hazardous substances and dangerous goods
- Spill / leak management and basic first aid procedures
- Compatibility of materials.

This training would be provided by suitable service provider/s. Where required, additional input may be required from external WorkCover accredited WH&S consultants.

TRAINING RECORDS

A record of all training undertaken will be maintained at the ***Council's Offices*** and will be made available for inspection by authorised personnel.

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Impacts on the natural environment are minimised
- Operational issues identified
- Demonstrated operational competency
- Employees safety protected
- Health and safety of public / visitors / neighbours protected
- Meeting environmental goal

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Violations and/or fines from Regulatory Agencies
- Pollution of the environment
- Unresolved operational issues
- Injury/Death to employee
- Injury/Death to public / visitors

REVIEWED BY: **APPROVED BY:**

DATE: **DATE:**

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN TRAINING / COMPETENCY SUMMARY			
OPERATIONAL STAFF	**TRAINING / COMPETENCY STREAM**		
	PROGRAM A Environmental & General Safety Induction for Facility	**PROGRAM B** Fire Fighting & Emergency Incident response.	**PROGRAM C** Hazardous Substance & Dangerous Goods Management
NAME & POSITION	**DATE OF TRAINING COMPLETION**		
REVIEWED BY: DATE:	**APPROVED BY: DATE:**		

APPENDIX 3: PIRMP EXERCISE RECORD & EVALUATION FORM

FACILITY: WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK		
DATE:		
EMERGENCY SEQUENCE:	**TIME**	
Matters:	**Hours**	**Minutes**
Incident uncovered		
Assessment of significance		
Initiation of incident response/notification of incident		
Evacuation alarm sounded (if necessary)		
Incident control/remediation action commenced		
Evacuation commenced (if necessary)		
Warden checks for personnel present		
Evacuation completed (if necessary)		
Pollution contained		
Clean up commenced		
Clean up completed		
All clear given		
Pollution Incident Report Form completed		
Exercise terminated		
COMMENTS:		
1. Compliance with Standard Operating Procedures (SOP's)		
2. Competency of Employees assessment		
3. Time frames for response		
4. General Comments/Recommendations for action		
OBSERVER		
SIGNED: **DATE:**		

STANDARD OPERATING PROCEDURE (SOP)

APPENDIX 4: POLLUTION INCIDENT REPORTING & RECORDING

PURPOSE AND SCOPE

The purpose of this procedure is to define the pollution incident reporting requirements which are applicable to the operation of the ***Walgett Sewage Treatment Plant and Reticulation network.***

A pollution incident is defined as 'material harm to the environment' as described in section 147 of the Act. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred. A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which material harm is likely to occur.

Note

There is a duty to report pollution incidents under section 148 of the Protection of the Environment Operations Act 1997 (POEO Act) in addition to EPL condition R2 which reads "The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act. Notifications must be made by telephoning the Environment Line on 131 555.

Note

*Use **Attachment A** for general pollution incident reporting (not sewerage related - STP & Reticulation Network)*

*Use **Attachment B** for general unauthorised effluent discharge from the STP*

*Use **incident form contained in** the '**Sewerage Treatment Plant Bypass Emergency Response Plan**' for sewerage discharge / overflow reporting resulting from a bypass event at the STP*

*Use **incident form contained in** the '**Sewerage Overflow Emergency Response Plan**' for sewerage discharge / overflow reporting resulting from an incident in the reticulation area*

PROCEDURE/STANDARD

1. If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release as a first response, (sand bagging, application of spill kit, shutting off the source, construction of temporary bunds/dam etc). Guidance can be found by referring to the Operations Manuals, SOP within the PIRMP and the like.
2. If the incident presents an immediate threat to human health or property, Fire & Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted for emergency assistance - phone 000.
3. At an appropriate time, during an incident, a staff member shall record the following;
    - Type and nature of the incident (what happened)
    - Notification source and details
    - Details of the conversations that may ensue with staff, emergency services and authorities
    - Time events
    - Actions taken to mitigate the incident
    - Details of other actions during the course of the incident management

4. As soon as possible during an incident staff will notify the ***Urban Manager (WSC)*** of the incident and provide an update of the action initiated.
5. ***Urban Manager (WSC)*** to notify the EPA and other agencies in accordance with the protocols in this PIRMP in addition to any parties specified in other plans.
6. The ***Urban Manager (WSC)*** is to record the details of the incident on a Pollution Incident Notification Form within 24 hours of the incident commencing and advise the ***Director - Engineering/Techncial Services (WSC)*** at the earliest possible moment.
7. **Post Incident**

   Documentation of incident activities is of critical importance following the incident. All records and forms used during the incident to document activities must be retained for future reference.

   Following an incident, the ***Urban Manager (WSC)*** will have the responsibility for collecting all records and forms used during the incident. These will be used for several purposes, such as incident investigation, insurance claims and potential legal actions.

   The ***Urban Manager (WSC)*** must, within 24 hours of being notified of a pollution incident, prepare a report documenting activities that took place during the incident.

   The report and all related documentation, will be submitted to Council's ***Director - Engineering/Techncial Services (WSC),*** for review and necessary follow up actions.

   Where there is potential for litigation in relation to the incident the ***Director - Engineering/Techncial Services (WSC)*** shall prepare a written report for referral to the Council's legal representative

ATTACHMENTS / ADDITIONAL FORMS

A. Pollution Incident Report Form
B. Discharge / Overflow Reporting Form

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Details of incident are readily available including information regarding incident response activities
- Demonstrated operational competency
- Meeting environmental goal

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Violations and/or fines from Regulatory Agencies

REVIEWED BY: **APPROVED BY:**

DATE: **DATE**

POLLUTION INCIDENT REPORT FORM (A) General Pollution Incident at STP or Reticulation Area (Non Sewerage)	
DATE OF INCIDENT:	**TIME OF INCIDENT:**
NAME OF REPORTING PERSON	
LOCATION OF INCIDENT Where did it occur?	
TYPE and **QUANTITY** of **MATERIAL INVOLVED**	
Outline **ACTIONS** initiated **IN RESPONSE TO INCIDENT**	
Was it necessary to initiate the **MAJOR INCIDENT NOTIFICATION PROTOCOL**?	
Was the **COMMUNITY NOTIFICATION & COMMUNICATION PLAN** activated?	
Was **ACTION IN ACCORDANCE WITH SOPS**? If not - why?	
Is there a **NEED TO REVIEW SOP** in response?	
DATE and **TIME** of details provided to: **RELEVANT SUPERVISOR**	
OTHER MATTERS	
MANAGEMENT ACKNOWLEDGEMENT: DATED:	

POLLUTION INCIDENT REPORT FORM (B) Effluent Discharge - STP (Non-Bypass related)	
DATE OF INCIDENT:	**TIME OF INCIDENT:**
NAME OF REPORTING PERSON:	
DETAILS of **PERSON WITNESSING THE DISCHARGE** or overflow	
LOCATION of incident Where did it occur?	
DATE and **TIME** of **COMMENCEMENT OF** the **DISCHARGE**	
Assessed **VOLUME OF DISCHARGE** or overflow	
PERIOD OF time the **DISCHARGE** or overflow occurred (Start / finish)	
WEATHER CONDITIONS at the time of the discharge or overflow.	
DAILY RAINFALL (mm) on the **DAY OF THE DISCHARGE**. **RAINFALL** (mm each day) for the **WEEK PRIOR TO THE DISCHARGE**	
SAMPLING OCCURRED? (Yes / No)? Most recent **MONITORING RESULTS** of the chemical composition of the **discharge**.	Attach analytical results
Explanation **WHY & HOW** the **DISCHARGE OCCURRED**	
PLAN OF ACTION to **PREVENT** a similar **DISCHARGE**	
OTHER MATTERS	
MANAGEMENT ACKNOWLEDGEMENT: DATED:	

STANDARD OPERATING PROCEDURE (SOP)

APPENDIX 5: POLLUTION INCIDENT NOTIFICATION PROTOCOL

CALL '000* IF THE INCIDENT PRESENTS AN IMMEDIATE THREAT TO HUMAN HEALTH OR PROPERTY...

Fire & Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

THEN...

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. The 24-hour hotline for each authority is given when available:

EPA - phone Environment Line on	131 555
The Ministry of Health via the local Public Health Unit	(08) 8080 1499
The WorkCover Authority - phone	13 10 50
Council (Environmental Services) on	02 6828 6100
Fire & Rescue NSW (if not called initially)	1300 729 579

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

APPENDIX 6: EFFLUENT POND / TANK / CONTAINMENT RUPTURE RESPONSE

PURPOSE AND SCOPE

The purpose of this procedure is to define an incident response in the event of a discharge resulting from a rupture of a pond / tank / containment being detected or reported at the ***Walgett Sewage Treatment Plant***

PROCEDURE/STANDARD Discharge to adjacent waterways

Actions required in response to such events may vary and it will be the role of the ***STP Operator in Charge (WSC)*** to determine and initiate appropriate actions in the first instance

The following notes will form the basis of that decision making together with emergency exercises and desktop trials:

- Incidental / permitted under the EPL - NIL substantial addition actions; OR
- Confine sources of inflows to limit the spread of its effects without endangering personnel. Check process pumps are working or implement bypass process if appropriate.
- Consider construction of sand bag barriers or earth berms to contain or divert the flow and/or excavate temporary retention dams to withhold discharge if other contamination involved.
- Secure the affected area(s) by using barricades and bunting if necessary.
- Advise the ***Urban Manager (WSC)*** of all actions taken or proposed.

Urban Manager (WSC) may, among other actions relevant to the type and scale of incident:

- Use tanker trucks / pumps to return retained fluid to system once holding capacity is available.
- Notify neighbours who may be affected by the incident (where human health risk likely).
- Ensure a copy of the Pollution Incident Report Form is referred to ***Director - Urban Infrastructure Services (WSC)***

It is considered essential that all operators using the site are aware and understand the specific emergency and incident response requirements.

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Limit environmental damage
- Health and safety of public / staff protected

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Violations and/or fines from Regulatory Agencies

REVIEWED BY: **APPROVED BY:**

DATE: **DATE**

APPENDIX 7: ENVIRONMENTAL MONITORING

PURPOSE AND SCOPE

The environmental monitoring program ensures early detection and reporting of possible pollution of surface waters. Sampling locations, analytes and frequencies are identified in the EPL.

PROCEDURE/STANDARD

All environmental monitoring at the site occurs in accordance with the requirements of ***EPL 13056***.

WSC and its contractors observe NATA and other industry standards to sample, analyse and report findings to comply with specific EPL requisites and wider EPA public reporting requirements.

REPORTING

All results received shall be reviewed by the ***Urban Manager (WSC)*** and reported to the NSW Environment Protection Authority (EPA).

If any particularly non-conformant results are received they shall be reported to the EPA within 14 days from receipt of results from the Laboratory or as otherwise required by the EPL

All results must be ***published to the Council Web page*** within 14 days following receipt of results from the relevant Laboratory.

BENEFITS OF COMPLIANCE TO PROCEDURE:

- Impacts on the natural environment minimised
- Operational issues identified
- Demonstrated operational competency

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Violations and/or fines from Regulatory Agencies
- Pollution of the environment
- Unresolved operational issues

STANDARD OPERATING PROCEDURE (SOP)

APPENDIX 8: CHEMICAL SPILL RESPONSE

PURPOSE AND SCOPE

The purpose of this procedure is to define an incident response in the event of a chemical spill at the ***Walgett Sewage Treatment Plant and Reticulation network***.

Notes: Small spills would not normally not reach the threshold to be a 'pollution incident'

PROCEDURE/STANDARD

Actions required in response to such an event may vary and it will be the role of the ***Urban Manager (WSC)*** to determine and initiate appropriate actions. The following notes will form the basis of that decision making process.

- Depending on the scale of the spillage, it may be necessary to make first contact with emergency services by dialling 000 and advise of the type of emergency and the assistance needed (Fire Brigade - HAZMAT)
- Secure the affected area(s) by using suitable means such as barricades and bunting. Engage measures to restrict vehicles entering the site
- If necessary, initiate evacuation of staff and others that may be on site, including contractors
- Where possible, confine the incident and prevent the spread of its effects without endangering personnel. This may include building sand bag bunds, rotating the container or plugging the leak.
- For small spills, use the spill kit kept on site or vehicle, cover drains and/or place temporary bunding
- Advise the ***Urban Manager (WSC)*** of all actions taken or proposed.
- Provide any requested assistance to Emergency Services IF SAFE TO DO SO.
- Notify neighbours who may be affected by the incident.
- Report the details of the spill on an Incident Notification Report and refer to the **Urban Manager *(WSC)***

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Limit environmental damage
- Health and safety of public/visitors protected

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Extended environmental damage
- Injury/death to employee
- Injury/death to public / visitors
- Violations and/or fines from Regulatory Agencies

APPENDIX 9: STORAGE & HANDLING OF CHEMICAL / HAZARDOUS SUBSTANCES

PURPOSE AND SCOPE

The use of chemicals and hazardous / dangerous good and substances at the ***Walgett Sewage Treatment Plant and Reticulation network*** is ***extremely limited.*** Usage includes process & treatment chemicals in addition to paints, solvents, fuels and oils etc for maintenance of site equipment / plant and herbicides / pesticides for controlling pests.

The aim of this procedure is to assist in the identification, handling, storage and disposal of hazardous substances. It includes the use of labels and Material Safety Data Sheets (MSDS), provision of information and training to personnel as well as storage and disposal requirements for use of hazardous substances.

PROCEDURE / STANDARD

1. Purchase of Materials

When a hazardous substance is purchased the supplier must provide sufficient information to ensure that the substance can be handled, stored, transported, used, processed and disposed of safely. Full safety data in the form of a current approved MSDS must be provided by the supplier on the first occasion that a hazardous substance is supplied. The manufacturer shall review and revise the MSDS every five years as a minimum. Suppliers are required to provide MSDS on request.

Whenever possible a non hazardous alternative shall be selected. However where no such alternative is available the most suitable, but least harmful or dangerous, shall be considered.

2. Labelling of Hazardous Substances

Suppliers shall ensure that all containers of hazardous substances for use are appropriately labelled. Where a hazardous substance is decanted and not used or further processed immediately, the container into which the substance is decanted is labelled with the product name and risk and safety information (this does not apply to substances which are decanted and used immediately). Hazardous substance containers shall remain appropriately labelled until they are cleaned and no longer contain any hazardous substance. All containers shall be in suitable condition. Damaged, leaking or corroded containers must not be allowed to remain at the site.

3. Material Safety Data Sheets

Material Safety Data Sheets should contain the following information as a minimum:

- State if the product is classified as a hazardous substance
- Safety Equipment to be worn by the operator when using the substance
- Storage requirements including compatibility with other substances
- Requirements for transport and disposal
- Procedures for cleanup and disposal of spilt product and waste containers
- First aid procedures if the substance contacts skin, eyes, is swallowed or ingested

A register of MSDSs shall be maintained at the facility and made available for use by all employees at site. All MSDS shall be readily accessible to all employees with potential exposure to those substances.

4. Storage

Flammable goods need to be stored away from sources of ignition and spillage containment is required. Dangerous goods legislation requires segregation of different classes of dangerous goods and licensing is required when certain quantities are exceeded.

5. Handling Hazardous Substances and Dangerous Goods

- Hazardous substances delivered to the facility shall be immediately placed into designated storage areas located within the facility.
- PPE listed in the MSDS shall be used by staff whenever handling materials

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Employee's safety protected
- Health and safety of public / visitors protected
- Impacts on the natural environment are minimised

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Injury/Death to employee
- Injury/Death to public/visitors
- Violations and/or fines from Regulatory Agencies

REVIEWED BY: **APPROVED BY:**

DATE: **DATE**

STANDARD OPERATING PROCEDURE (SOP)

APPENDIX 10: FUEL / OIL SPILLS RESPONSE

PURPOSE AND SCOPE

To define the procedure for the containment, management and cleanup of fuel / oil spills at the ***Walgett Sewage Treatment Plant and Reticulation network***.

Notes: Small spills would not normally reach the threshold to be a 'pollution incident'.

PROCEDURE/STANDARD

Definitions

Fuel / oil spills refers to discharges of petroleum compounds, including petrol, diesel, lubricating oils, hydraulic oils, greases etc. Spillage of oils and fuels may arise from leaking machinery (e.g. burst hydraulic hoses) and spillage of liquids from containers stored at a site.

It is important to take prompt action to clean up any spilt oil or fuel to minimise the risk of accidents occurring and to prevent contamination of local waterways should the spilt fuel / oil enter the site drainage system.

Equipment available to clean up oil spills include oil absorbent pads, "kitty litter", oil absorbent booms and drain blocking pads. Additional materials may be obtained by contacting the Council's Store or Suppliers. This equipment or "spill kit" should be stored close to point of use or in a readily transportable form e.g. on a trailer or in a wheeled bin.

The steps in this procedure shall be as follows:

Depending on the scale of the spillage, it may be necessary to make first contact with emergency services by dialling 000 and advise of the type of emergency and the assistance needed (Fire Brigade - HAZMAT).

IF SAFE TO PROCEED:

1. For mechanical equipment, shut down the item of plant and plug the leak or crimp the hydraulic hose if possible and quickly. For leaking containers, address the source of the leak, but at all times, avoid contact with the material.
2. Isolate adjacent drainage points.
3. Dam and contain the spill using the contents of the spill kit.
4. Recover and absorb.

Once the source of the leak is established, undertake all efforts to prevent further flow, e.g. if leak is from an oil drum, roll drum so that leak areas is uppermost. If leak is from pipe from oil truck, close valves etc. All attempts should be made to plug the leak if safe to do so.

Stop all human and vehicular traffic through the spill area. Isolate sources of ignition and advise fire authorities (and licensing authorities). Mobilise fire extinguishers, if suitable.

Contain the spill as follows:

- Protect drains by forming barriers and sealing drainage grates (e.g. using strong plastic bags partially filled with sand or water). The absorbent socks and pillows can be used to block off drains allowing water to go through but trapping the oil. Absorbent material has limited capacity and needs to be replaced regularly.

- If possible stop the spill from spreading by deflecting the oil into another container.
- Form barriers using absorbent material and place on the edge of the spill (or use any other suitable and available materials, e.g. soil, sand).
- All used absorbent material is to be collected for disposal at a suitable landfill.
- If sufficient product exists, hand pumps should be used and product transferred to a suitable container (lined drums, skips or tankers).
- Avoid the use of electrical equipment / smoking that could be a source of ignition.

Reporting:

- Advise the ***Urban Manager (WSC)*** of all actions taken or proposed.
- Provide any requested assistance to Emergency Services IF SAFE TO DO SO.
- Notify neighbours who may be affected by the incident.
- Report the details of the spill on an Incident Notification Report and refer to the ***Urban Manager (WSC)***

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Employee's safety protected
- Health and safety of public / visitors protected
- Impacts on the environment are minimised

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Injury to employee
- Injury to public / visitors
- Environmental pollution
- Violations and / or fines from regulatory agencies

REVIEWED BY: **APPROVED BY:**

DATE: **DATE**

APPENDIX 11: FIRE WITHIN THE SEWERAGE TREATMENT PLANT

PURPOSE AND SCOPE

To define a procedure for responding to a fire that is detected at the **Walgett Sewage Treatment Plant**

PROCEDURE/STANDARD
Fire

1. Attempt to extinguish a small, controlled fire with equipment on site without endangering facility personnel and equipment. This may include the use of a fire hose reel, extinguisher , or isolating the source of the fire and smothering with suitable material or fire blanket

Note: If using a fire extinguisher, be sure to use the correct extinguisher for the fire type.

2. If in any doubt, evacuate area and immediately call '000' and request the presence of Fire & Rescue NSW. Provide all information required (i.e. your name, fire location, type, size etc).
3. As soon as possible notify the **Urban Manager (WSC)** of the incident and provide an update of the action initiated to date.
4. Keep all unauthorised people away from the area where the fire is burning.
5. Provide any requested assistance to Emergency Services IF SAFE TO DO SO.
6. Commence notification of Neighbours where offsite smoke / fire or pollution impact is likely.
7. Report the details of the fire on a Pollution Incident Notification Report and refer to the **Urban Manager (WSC)**

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Meeting environmental goal.
- Employee's safety protected
- Health and safety of public / visitors protected
- Minimise damage to public property

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Injury/death to employee
- Injury/death to public / visitors
- Damage to public property
- Violations and/or fines from Regulatory Agencies

REVIEWED BY:	**APPROVED BY:**
DATE:	**DATE**

STANDARD OPERATING PROCEDURE (SOP)

APPENDIX 12: FACILITY EVACUATION

PURPOSE AND SCOPE

To define a procedure covering the requirement to implement an Evacuation of the ***Walgett Sewage Treatment Plant*** in an acceptable manner.

PROCEDURE/STANDARD *Emergency Response*

1. Upon notification of an incident the ***Chief Warden*** (generally this would be the ***STP Operator in Charge (WSC)*** or other ***most senior staff member at the site***) determines the need for evacuation.
2. Chief Warden contacts by telephone the emergency services by dialling '000' providing all information they require (i.e. your name, incident type, size, etc.).
3. Chief Warden sounds the evacuation alarm (if present) or provides evacuation advice to all personnel and visitors on site.
4. The Chief Warden initiates measures to restrict vehicles entering the facility.
5. The Chief Warden determines safe evacuation routes and direct personnel and visitors to the Primary Evacuation area. Where necessary unlock gates on evacuation routes so as to provide for movement to the Primary Evacuation Point or a Secondary Evacuation Point.
6. The Chief Warden provides direction to Primary Evacuation Point.
7. Prior to leaving the facility the Chief Warden with the assistance of any area deputy / area wardens accounts for all personnel including checking of all work areas.
8. Upon arrival at the Primary Evacuation Point the Chief Warden is to;
   a) Confirm the presence or otherwise of all personnel/staff and visitors (as far as practical)
   b) Determine the suitability of the Primary Evacuation Area. If necessary initiate movement to Secondary Evacuation Point or Post Evacuation Assembly Area.
   c) Upon their arrival brief the emergency services including the status of facility personnel.
   d) Co-ordinate the movement of personnel to the Post Evacuation Assembly Area.
   e) Brief the **Urban Manager (WSC) or Director - *Engineering/Techncial* Services (WSC)** on the incident and provide an update of the action initiated to date.
9. The Chief Warden is to report the details of the event on an Incident Notification Report Form and refer to the ***Urban Manager (WSC).***

BENEFIT OF COMPLIANCE TO PROCEDURE:

- Meeting the legislative requirements.
- Improved safety for site staff, contractors and visitors

CONSEQUENCE OF NON-COMPLIANCE TO INSTRUCTION:

- Violations and/or fines from Regulatory Agencies
- Death or injury to site staff / visitors

REVIEWED BY: **APPROVED BY:**

DATE: **DATE**

EMERGENCY CHECKLIST FOR CHIEF WARDEN

Name of Chief Warden:	
Time at which potential emergency was raised:	
Location of potential emergency:	
Description of potential emergency:	
IF EMERGENCY IS DECLARED:	
Emergency declared	Time
ALERT signal activated (if available)	Time
Phone relevant Emergency Service on 000	Time
IF SITE EVACUATION IS NECESSARY:	
Evacuation signal activated / advice issued?	Time
Deputy/ Area Wardens report evacuation is complete:	

AREA	**WARDEN**	**AREA EVACUATED**	**COMMENTS**

ADVISED EMERGENCY SERVICE:	**TIME**

APPENDIX 13: COMMUNICATIONS RECIPIENTS SCHEDULE (NEIGHBOURS)

Not applicable.

APPENDIX 14: OPERATIONAL CHECKLISTS

WSC has a range of maintenance and operation works program which incorporates general operational functions for staff from Daily through to Annual actions across the operations covered by the EPL. These are 'living' operations guides and are not reproduced in the PIRMP.

The following Operational Checklists define the protocols for undertaking site inspection and audits at the **Walgett Sewage Treatment Plant and Reticulation network** with the aim of:

- minimising the likelihood of a pollution incident occurring
- identifying non-conformance with EPA licence conditions and to implement corrective actions where necessary
- identifying non-conformance with the **PIRMP** and the implementation of corrective actions

AUDITING AND INSPECTION PROGRAM - OVERVIEW		
TYPE OF AUDIT	FREQUENCY	RESPONSIBILITY
Site Inspection / General Operations and Maintenance Program compliance monitoring	Daily, weekly, monthly etc	**STP Operator in Charge (WSC)**
Operations Audit	Quarterly, six monthly	**Urban Manager (WSC)**
Environmental Audit	Annual	**Director - Engineering/Techncial Services (WSC)**

These operational Checklists are additional to the Works Programs for the operational areas covered by the EPL.

The inspection and auditing functions are to be undertaken in acc)ordance with the following requirements:

OPERATIONAL CHECKLIST - DAILY

WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK

Record and cleanup and evidence of fuel / lubricant contamination / spillage

Effluent ponds - No evidence of overflows noted or likely

Fuel containers and chemical storages - secured/not leaking/properly sealed / bunded

Perimeter fence line secure and intact (STP)

Record of Incidents or site complaints up to date

VERIFIED BY: STP Operator in Charge (WSC)

Satisfactory Unsatisfactory

DATE:

WEEKLY SITE INSPECTION CHECKLIST

WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK

DATE:							INSPECTED BY:	
ISSUE:	INSPECTION FREQUENCY AND ACKNOWLEDGEMENT					SATISFACTORY Y/N	ACTION TAKEN	COMMENTS
Hardstand areas, roads and chemical unloading zone free of obstructions	Weekly	Week 1	Week 2	Week 3	Week 4			
Stormwater infrastructure clear of debris, litter or sediment accumulations	Weekly / After rain	Week 1	Week 2	Week 3	Week 4			
Emergency spill kits and first aid kits on site and fully stocked	Weekly	Week 1	Week 2	Week 3	Week 4			
Perimeter fence line secure and intact (STP and Effluent Ponds / Utilisation Areas)	Weekly	Week 1	Week 2	Week 3	Week 4			
Weather Station Data being recorded / stored appropriately	Weekly	Week 1	Week 2	Week 3	Week 4			
Test dousing showers (if / when installed)	Weekly	Week 1	Week 2	Week 3	Week 4			

STP Operator in Charge (WSC)

Satisfactory Unsatisfactory

DATE:

QUARTERLY & SIX MONTHLY SITE AUDIT CHECKLIST					
WALGETT SEWAGE TREATMENT PLANT					
DATE:				**CONDUCTED BY:**	
ISSUE	**ACTIVITY FREQUENCY AND ACKNOWLEDGEMENT**		**SATISFACTORY Y/N**	**ACTION TAKEN**	**COMMENTS**
EPL Environmental Monitoring undertaken, evaluated and published to webpage within 14 days of receipt from Laboratory	Quarterly				
Fire Safety Certificate inspection undertaken for all essential fire safety equipment onsite.	Quarterly				
Conditions of EPA licence for facility being met	Quarterly				
Breathing Apparatus, PPE and response equipment checks undertaken to ensure maintenance has been affected in accordance with specified frequencies	Quarterly				
Incident reporting -entries correct and complete	Quarterly				
Register of weekly site inspections - current and complete	Quarterly				
Biogas venting (passive or forced) is maintained	Six Monthly				
Review of on-site emergency procedures against PIRMP undertaken	Six Monthly				
VERIFIED BY: Urban Manager (WSC) **DATE:**			Satisfactory Unsatisfactory		

ANNUAL EPL & PIRMP COMPLIANCE AUDIT					
WALGETT SEWAGE TREATMENT PLANT AND RETICULATION NETWORK					
DATE:				CONDUCTED BY:	
ISSUE	ACTIVITY FREQUENCY & ACKNOWLEDGEMENT		SATISFACTORY Y/N	ACTION TAKEN	COMMENTS
Review of EPL environmental monitoring records.	Annual				
Review of operational management documentation including PIRMP, SOPs, Risk registers	Annual				
Toolbox meeting with site staff to ensure an understanding of the PIRMP / EPL requirements are satisfactory	Annual				
Review of non-conformance reports, weekly inspection checklist, Quarter & Six monthly audits, Pollution Incident Records and PIRMP review (occurred as required)	Annual				
Identification and implementation of any improvements to the operation of the facility	Annual				
Annual monitoring reports prepared and submitted to EPA (annual return)	Annual				
VERIFIED BY: Director - Engineering/Techncial Services (WSC) Satisfactory Unsatisfactory DATE:					

APPENDIX 15: SITE SERVICES & INFRASTRUCTURE PLAN

Refer to Figures 2(a) and 2(b).

APPENDIX 16 PIRMP TRAINING AGENDA & ATTENDEES

Walgett Shire Council
Training in the Format and Use of a Pollution Incident Response Management Plan (PIRMP)

Tuesday 28th February 2023
Venue –Walgett Council Offices

1:00 pm – Welcome & Introduction

PIRMP - Background

- The importance of having good systems in place
- PIRMP – background and key components and responsibilities
- Pollution incident prevention, recognition and preparedness
- Pollution incident control and response
- Pollution incident procedures
- Record keeping and reporting

1:30-2:00 pm

Notification, communications and reporting

- Roles and responsibilities
- PIRMP maintenance and revision
- Notification and communications
- Safety of employees and facility users
- The protection of facility assets
- The management of pollution incidents

2:00-2:30 pm - Exercises

Testing the Plan

- Discussion on what constitutes a minor incident and what constitutes a major incident. How to respond to such incidents.
- Training obligations
- How to test and record the required response to a major pollution incident
- Desk top simulation exercises
- The role of the Regulator & EPA Investigations
- Post Incident Checklist

3:00- 3.30 pm

Review and Close

APPENDIX 17 PIRMP TRAINING ATTENDEE LIST

Walgett Shire Council

Training in the Format and Use of a Pollution Incident Response Management Plan (PIRMP)

Tuesday 28th February 2023
Venue – Walgett Council Offices

Attendees:

Name	Position	Signature
Grant Green	Water & Sewer	
Allan middleton	Water / Sewer	
DAVID RYAN	URBAN MANAGER	
David Lane	Waste Contractor	
Dasuni Alsiriyage	Waste, Environmental Compl	
Kimberley Talbot	Director	
dryan@walgettnsw.gov.au	0419 995 062	

Cavanagh Consulting

APPENDIX 18: PIRMP TRAINING SIMULATION EXERCISES

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN **SIMULATION EXERCISE # 1 WASTE - EVALUATION FORM**	
Location: Walgett Waste Facility	
RESPONSE SEQUENCE:	**TIME 2.00 pm** **DATE 28th February 2023**
Name and Position of those engaged in the simulation exercise	**COMMENTS**
Kimley Talbert - Director Environmental Services WSC David Ryan – Urban Manager Dasuni Algiriyage – Waste, Environmental and Compliance Officer Grant Green – Water & Sewer Allan Middleton – Water & Sewer David Lane – Waste Contractor	
Scenario # 1 ○ It's a Monday morning and you are on your way to work (say 6:30am) and get a call from the Police advising they've had an anonymous call saying they have noticed smoke coming from the Walgett Landfill. ○ You decide you better check it out before calling the fire brigade in case it's a hoax so you race out there (within the speed limit of course) to find exactly that. ○ The fire is in the tyre stockpile and appears to have not been alight for long however as you know tyre fires can spread quickly emit toxic fumes and can even lead to liquid run off that can lead to other consequences. ○ What do you do and in what order ?	
Assessment of significance	Minor but could spread quickly
Initiation of PIRMP Call Council's Supervising Officer and Contractor MD – advise of the situation	Refer to PIRMP Flow Chart Call 000 ask for Fire Brigade advise address and details Ensure gate remains secure to prevent public access Plant operator can safely divide away remaining tyres to prevent fire spreading and puch up soil bund around lower side of the pile on fire to prevent leachate spreading Report fire at the Landfill to the office so the public can be informed

	Fire brigade arrives and extinguishes the fire
Evacuation required ?	Initiate evacuation plan from immediate area only (barricade off main gate)
Clean Up undertaken	Remove burnt tyres and soil to Landfill
Incident notification to all agencies.	EPA Council GM
Incident control/remediation action commenced – • SOP Appendix • Neighbour notification • Web update • Media release	Refer to PIRMP – Plant operator can handle the clean up Additional media is not required
Pollution Incident Report Form completed	Prepare a written report and submit to the EPA in accordance with EPL condition Post incident review to be undertaken within one week of the incident
Simulation exercise concluded	2:50pm

COMMENTS

1. Compliance with PIRMP, including Standard Operating Procedures (identify areas that need to be addressed and list them)
    - Council to check Emergency Assembly Point and suitable signage
    - Council to check if Pollution Incident Flow Chart is displayed in the site office
2. Assessment of employee/contractor competency (identify improvements that need to be made and list them)
    - Staff and contractor were conversant with procedures and general knowledge of SOPs.
3. Time frames for response – (were they timely?)
    - N/A as theory only desktop simulation
4. General Comments/Recommendations for action, including changes to the PIRMP
    - PIRMP to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise (Appendix 1 – distribution) including changed Contacts names and numbers
    - Complete actions as per (1) and (2) above
    - Plant operator to ensure tyre stockpiles remain manageable and separated
    - Updated PIRMP to be issued and old copies destroyed

SIGNED (by assessor)

Date 13th April 2023

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN SIMULATION EXERCISE # 2 WASTE - EVALUATION FORM	
Location: Walgett Waste Facility	
RESPONSE SEQUENCE:	**TIME 2.50 pm** **DATE 28th February 2023**
Name and Position of those engaged in the simulation exercise	**COMMENTS**
Kimley Talbert - Director Environmental Services WSC David Ryan – Urban Manager Dasuni Algiriyage – Waste, Environmental and Compliance Officer Grant Green – Water & Sewer Allan Middleton – Water & Sewer David Lane – Waste Contractor	
Scenario # 2 ○ You are working at the Walgett Landfill and it is Friday afternoon and you've returned to the Landfill to reopen it after lunch (had to slip down town to run an errand). ○ Upon arrival you see a 20 litre drum dumped outside the gate. ○ It is on its side and has started leaking what appears to be engine oil. ○ A member of the public arrives behind you to drop off some rubbish and notices the spill. ○ What do you do?	
Assessment of significance	Minor
Initiation of PIRMP. Incident response/notification of incident (all "relevant" agencies)	Refer to PIRMP Who initiates plan? What are the roles and responsibilities? Who is the responsible person ? Attends the site and liaises with on-site contractor & makes phone calls to relevant agencies.
Evacuation alarm sounded (if necessary)	Not necessary
Incident control/remediation action commenced – • SOP 20 – Chemical or Oil Spill • Neighbour notification ? (only adjacent) • Landfill kept closed • Web update • Media release	Refer to PIRMP - Check SOP How are neighbours notified? Who does it? What are the messages? Minor incident so not required. Advise customer they'll need to wait until the site is clear or better still return in an hour Refer to Communications Recipients Schedule – not required

	Who is authorised to issue media statements - not required
Evacuation commenced (if necessary)	Barricade area
Warden checks for personnel present	Not necessary
Evacuation completed (if necessary)	Not necessary
Pollution contained - • Report situation to EPA • Report situation to main office	Form an earth bund Who reports and what is reported Who provides update to EPA and other agencies Neighbours - phone and give update Not necessary as spill is contained
Clean up commenced • Drums secured in a container • Plant operator load away container and contaminated sand to disposal cell	Obtain spill kit from shed Mop up excess oil
Clean up completed • Report back to EPA and main office.	Reopen the site
Pollution Incident Report Form completed	DES prepares a written report and submits it to the EPA in accordance with EPL condition Post incident review to be undertaken within one week of the incident
Simulation exercise concluded at (TIME)	3:20pm

COMMENTS

5. Compliance with PIRMP, including Standard Operating Procedures (identify areas that need to be addressed and list them)

6. Assessment of employee/contractor competency (identify improvements that need to be made and list them)

7. Time frames for response – (were they timely?) NA as theory only desktop simulation

8. General Comments/Recommendations for action, including changes to the PIRMP
   - PIRMP to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise (Appendix 1 – distribution)
   - Complete actions as per (5) and (6) above
   - Ensure spill kit is replenished
   - Updated PIRMP to be issued and old copies destroyed

SIGNED (by assessor)

Date 13th April 2023

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN SIMULATION EXERCISE # 3 STP - EVALUATION FORM	
Location: Walgett Sewage Treatment Plant (and system)	
RESPONSE SEQUENCE:	**TIME 3.15 pm** **DATE 28th February 2023**
Name and Position of those engaged in the simulation exercise	**COMMENTS**
Kimley Talbert - Director Environmental Services WSC David Ryan – Urban Manager Dasuni Algiriyage – Waste, Environmental and Compliance Officer Grant Green – Water & Sewer Allan Middleton – Water & Sewer David Lane – Waste Contractor	
Scenario # 3 ○ You are at the STP to do some general maintenance and go to the store room to get some fuel for the mower. ○ As you open the door you smell petrol and find a drum has been leaking and there's about 10 litres on the floor. ○ It's a very hot day and there's a very high fire danger. ○ You are the only person on duty. ○ What do you do?	High risk of fire due to the extreme weather conditions Small volume so staff can contain it
Assessment of significance	Minor (unless it ignites)
Initiation of PIRMP. Incident response/notification of incident (all "relevant" agencies)	Refer to PIRMP Who initiates plan? What are the roles and responsibilities? Who is the responsible person, makes phone calls to W&S staff. Who relevant agencies ?
Evacuation alarm sounded (if necessary)	Not necessary
Incident control/remediation action commenced – • SOP 20 – Chemical or Oil Spill • Neighbour notification • Web update • Media release	Refer to PIRMP - Are neighbours notified? If so who does it? What are the messages - Not required Refer to Communications Recipients Schedule Are any neighbours affected ? No Who updates the web? Not required Who is authorised to issue media statements ? Not required
Evacuation commenced (if necessary)	Not necessary

Warden checks for personnel present	Not necessary
Evacuation completed (if necessary)	Not necessary
Pollution contained within the shed - • Report situation to EPA • Report situation to main office	Who reports and what is reported Who provides update to EPA and other agencies
Clean up commenced	Remove all sources of ignition from within the shed including mobile phones W&S crew rectify the container and place it into a sealed container Obtain spill kit and mop up liquid Take container and kitty litter to Landfill for disposal on back of vehicle and take fire extinguisher in the vent of an emergency
Clean up completed • Report back to EPA and main office.	
Pollution Incident Report Form completed	Not required Post incident review to be undertaken within one week of the incident
Simulation exercise concluded at (TIME)	3:30pm

COMMENTS

9. Compliance with PIRMP, including Standard Operating Procedures (identify areas that need to be addressed and list them)

10. Assessment of employee/contractor competency (identify improvements that need to be made and list them)
    - Training of contractor and contractors staff required or develop a new SOP ?

11. Time frames for response – (were they timely?)
    - NA as theory only simulation

12. General Comments/Recommendations for action, including changes to the PIRMP
    - PIRMP to be updated to reflect improvements identified to address deficiencies exposed during the simulation exercise
    - Contacts list to be updated
    - Spill kit to be replenished
    - Fuel containers to be stored in cupboard
    - Updated PIRMP to be issued and old copies destroyed

SIGNED (by assessor)

Date 13th April 2023