

Snowy Monaro Regional Council

Pollution Incident Response Management Plan



Record of Versions

Version	Date Published	Reason for Amendments	Author or Document Owner
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1. Purpose

Snowy Monaro Regional Council (Council) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for multiple wastewater and water systems. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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

A written copy of this plan must be kept at each site, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

This plan summarises the information from Council's numerous specific PIRMPs to meet requirements for a publicly available plan containing the information required under Section 153C of the POEO Act and clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009.

1.1 What is a pollution incident?

'Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.' - Dictionary of the POEO Act.

1.2 When does notification need to be given of a pollution incident?

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm 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.'

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).

Section 148 of the POEO Act sets out additional pollution incident notification requirements.

Snowy Monaro Regional Council empowers all individuals, employees or otherwise, to report pollution incidents, or suspected pollution incidents, to the EPA hotline on 131 555 and to the 24-hour Council hotline on 1300 345 345 if they notice a pollution incident or believe adequate action is not being taken.

1.3 Timing of notification

Notification needs to be given to the relevant authorities listed in 3.1 immediately – immediately meaning promptly and without delay.

2. Environment Protection Licence (EPL) Details

In accordance with the POEO Act, Snowy Monaro Regional Council has prepared 7 EPL specific PIRMPs detailing the procedures to be followed in the event of pollution incidents in each area of operation. PIRMPs have been produced for the following wastewater or water systems highlighted in the table below.

Treatment Facility	Licence Number
Adaminaby STP	450
Berridale STP	456
Bombala WTP	1640
Bombala STP	1752
Cooma STP (The Glen)	6368
Jindabyne STP	773
Nimmitabel STP	1392

For any operational faults or incidents involving Council's Assets, contact Council 24/7 on **1300 345 345**.

3. Pollution Incident – Person/s Responsible

Responsibility	Responsible Person
Activation of the PIRMP	Manger Water and Wastewater Operations
Notifying relevant authorities	Quality and Compliance Officer Water and Wastewater Operations
Managing response to the pollution incident	Wastewater Supervisor for relevant area of operations

3.1 Notification of relevant authorities

Department	Contact Details	When to Contact?	Who will initiate Contact?
Fire and Rescue NSW/Rural Fire Service	Phone: 000 (First notification)	If there is an immediate threat to life, or a threat to property that requires emergency services to attend	First on scene, or any staff member that deems a threat is present
NSW Environmental Protection Authority (EPA)	Phone: 13 15 55 Email: info@epa.nsw.gov.au	As soon as possible, if the requirements of 1.1 and 1.2 are met	Quality and Compliance Officer or any staff member who is deems the requirements of notifying are met
Public Health Unit NSW	Local Environmental Health Officer 1300 066 055 Email: MLHD-EH-PHU@health.nsw.gov.au	As soon as possible, if the requirements of 1.1 and 1.2 are met	Quality and Compliance Officer
NSW Department of Primary Industries - Water Service NSW	Phone: 1300 081 047	If there is significant pollution or harm to waterways	Quality and Compliance Officer
SafeWork NSW	Phone: 13 17 00	If potential harm or impact to state roads e.g. Monaro Highway	Quality and Compliance Officer
SafeWork NSW	Phone: 13 10 50	If there is a serious injury or illness, a death or a dangerous incident/near miss contact WHS Manager to liaise with Safe Work	Work Health Safety Manager
Snowy Hydro Limited	Phone: (02) 6453 2888 Email: info@snowyhydro.com.au	If there is existing or potential harm or impact on Snowy Hydro assets	Quality and Compliance Officer

3.2 Notification of local community

All neighbouring and downstream properties that may be effected by the pollution incident should be notified immediately. In the first instance, notification should take place via a door knock, phone call, email or SMS. If neighbouring and downstream properties will be impacted by the pollution event, or work crews in the area, property owners should be updated as necessary through door knocks, phone call, emails or SMS.

List of all neighbouring properties and those 5km downstream of each site are included in the appendix of each PIRMP.

4. Pollution Incident

Hazards to human health or the environment associated with the activity to which the licence relates:

4.1 Hazards to human health or environment

List of hazards to human health or the environment, including pre-emptive actions to be taken.

Hazard to human health or environment	Conditions that may increase likelihood of hazard occurring	Pre-emptive actions to minimize or prevent any risk to health or environment
Raw or semi-treated wastewater entering watercourse from the sewage treatment site	<ul style="list-style-type: none"> High-rainfall events Structural failure Failure of mechanical/electrical equipment Failure of power supply Bushfire 	<ul style="list-style-type: none"> Telemetry system to generate alarms for electrical, mechanical and power supply failures Daily operator process inspections and testing Maintenance program for mechanical and electrical equipment Diversion of effluent for emergency storage at some sites
Raw sewage overflow from the sewage system	<ul style="list-style-type: none"> Blockage Damage Mechanical failure Loss of power Electrical failure Bushfire 	<ul style="list-style-type: none"> Telemetry system to generate alarms for electrical and power supply failures Daily operator process inspections and testing Emergency overflow storage at some sites
Chemical Spill from the sewage treatment site	<ul style="list-style-type: none"> Broken pipe or pump Electrical failure Accident Bushfire 	<ul style="list-style-type: none"> Chemicals are contained within bunded areas

4.2 Communicating with neighbours and the local community

Noise

In the unlikely event of planned works that will generate noise that could cause a disturbance to residents in the vicinity of any treatment site, a letter drop will take place before the work informing residents of the date and time of the work and contact details should they have any questions or concerns.

Odour

In the unlikely event of planned work happening will generate odour that could cause a disturbance to residents in the vicinity of any treatment site, a door knock or letter box drop will take place before the work informing residents of the date and time of the work and contact details should they have any questions or concerns.

Discharge to the river

In the event of raw or semi-treated sewage being discharged into a waterway, Snowy Monaro Regional Council will contact downstream properties by a door-knock, phone call, email or SMS to impacted property owners.

4.3 Minimising harm to person on the premises

Snowy Monaro Regional Council has comprehensive workplace health and safety procedures to minimise the risk of harm to workers at the premises including the issuing of PPE, chemical handling procedures, manual handling procedures, confined space entry procedures, and signage. Every worker and visitor is inducted into the site and is expected to comply with all reasonable direction from Snowy Monaro Regional Council staff. All workers are expected to make themselves familiar with and comply with Council's policies, procedures, guidelines and reporting processes available on-site and on Council's intranet.

5. Actions to be taken during or immediately after a pollution incident

5.1 Staff actions

Responsible Person	Actions
Staff attending the incident	<ol style="list-style-type: none"> 1. Assess the incident <ul style="list-style-type: none"> • Call 000 if there is an immediate threat to life or property that requires emergency services to attend • Assess whether it is a pollution incident causing harm to the environment as defined in 1.1 and 1.2 of this document 2. Notify Supervisor <ul style="list-style-type: none"> • Initiate activation of PIRMP 3. Assess the situation <ul style="list-style-type: none"> • Prioritise the safety of yourself and others • Provide first aid and tend to the welfare of staff and public • Make the area safe • Estimate quantity of spill and the possible source and make up of pollutants • Take photographs 4. Stop the spill <ul style="list-style-type: none"> • Stop the spill at the source if possible • Shut-down, bypass or make-safe affected assets 5. Contain the Spill <ul style="list-style-type: none"> • Prevent the spill from entering the environment and stormwater using onsite and Council assets and engage external assets if necessary • Assess the extent of the spill and begin containment and clean up • Ensure all parties are inducted onto site and have appropriate PPE 6. After the incident <ul style="list-style-type: none"> • Complete a log of actions with photographs
Water & Wastewater Supervisor	<ol style="list-style-type: none"> 1. Assess the incident <ul style="list-style-type: none"> • Make sure the site is safe for workers and public (call 000 and/or WHS Manger if there is immediate threat to life or safety) • Take photographs to document the overflow/spill • Determine the cause of the failure or spill • Estimate time until return of services • Note any environmental concerns • Estimate the extent of work to be carried out and if any hazards exist • Determine PPE required • Determine any Manual Handling issues • Determine any Traffic Control Methods/issues as required • Complete appropriate forms • Determine potential time of repairs and assess staff capabilities and availability including potential fatigue 2. Notify Manager Water and Wastewater Operations <ul style="list-style-type: none"> • Liaise with Manager Water & Wastewater to identify who else needs to be contact to provide assistance in managing the incident response – Senior Engineer and/or Senior Technical Officer 3. Notify Compliance Officer Water and Wastewater

	<ul style="list-style-type: none"> • Advise if any authorities have already been notified and liaise to organise further notification of authorities • Discuss with Compliance officer what water sampling may be required as part of step 7 <ol style="list-style-type: none"> 4. Enable staff to assess, stop and contain the spill 5. Advise manager if there is any damage to private property <ul style="list-style-type: none"> • Health & Environment Department to organise an inspection either to assist with assessing the clean-up or to assess internal plumbing (when internal overflow) 6. Follow water sampling procedures for sewer overflows and/or chemical spills <ul style="list-style-type: none"> • Liaise with Compliance Officer for location and frequency 7. Recovery <ul style="list-style-type: none"> • Inspect the site at the completion of the clean-up • Identify procedure and necessary equipment to maintain level of service to customers • Conduct necessary repairs and replacements • Complete log of actions taken, including photographs
<p>Quality and Compliance Officer Water and Wastewater Operations</p>	<ol style="list-style-type: none"> 1. Determine whether the spill could have any environmental or public health consequences 2. Contact relevant authorities as per Part 3.1 of this document <ul style="list-style-type: none"> • Report incident to NSW EPA and request call back if assistance is required • Keep relevant authorities informed and engage assistance wherever necessary 3. Initiate water sampling procedures <ul style="list-style-type: none"> • Confirm with Wastewater/Water supervisor the location and frequency of sampling • Provide support to Wastewater/Water Supervisor or staff attending incident to ensure sampling is taken in accordance with procedures as soon as practical and safe to do so • Create Chain of Custody (COC) form for sampling 4. Inspect the site at the completion of clean up – take photos 5. Recovery <ul style="list-style-type: none"> • Complete and submit relevant reports to notified authorities • Schedule debrief session and PIRMP test within one month of the incident
<p>Senior Technical Officer Water & Wastewater Senior Engineer Water & Wastewater</p>	<ol style="list-style-type: none"> 1. Provide a supporting role as required by in assisting staff both onsite and offsite 2. Enable staff to assess, stop and contain the spill <ul style="list-style-type: none"> • Support Supervisor and staff to engage necessary internal and external assets • Assist staff with any photographs and documentation of the incident 3. Recovery - Ensure service delivery will continue and repair and replacement is completed as necessary 4. Inspect the site at the completion of the clean-up
<p>Manager Water and Wastewater Operations</p>	<ol style="list-style-type: none"> 1. Fully activate PIRMP if deemed necessary and has not been activated prior 2. Inform Council's Executive Leadership Team 3. Support supervisor and staff to engage necessary internal and external assets

4. Engage governance if private property has been damaged
 - Contact Council's Health & Environment Department to organise an inspection or assist with assessing the clean-up or assess internal plumbing (where there is an internal overflow)
5. Ensure required sampling and photographs have been taken and documentation made
6. Inspect the site or view photographs at the completion of clean up

5.2 Coordinating with authorities

The Manager Water and Wastewater Operations will coordinate communication with Council's Executive Leadership Team.

The Quality and Compliance Officer Water and Wastewater will coordinate communication with the NSW EPA, NSW Health, NSW DPI, Snowy Hydro, and Service NSW as outlined in Part 3.1.

The Work Health Safety Manager will coordinate communication with SafeWork NSW, if required, as outlined in Part 3.1.

The Senior Engineer and the Technical Officer of Water and Wastewater are to provide a supporting role to the area supervisor who will manage the pollution incident response.

5.3 Communication

All communication with external bodies not involved in the pollution response should be reviewed by Snow Monaro Regional Council's Communications Team. Any further enquiries from neighbouring properties or the general public should be directed to the Water and Wastewater Operations Team on 1300 345 345.

6. Staff training

An annual desk top or practical training exercise will be conducted with the staff responsible for the management and operation of the PIRMP. A record of the exercise including the names of participants and issues raised will be maintained for each exercise and used to initiate improvements in the PIRMP.

7. Testing and updating of the PIRMP

The individual PIRMPs are tested and reviewed annually and within one month of an incident requiring an activation of a PIRMP.