



# Pollution Incident Response Management Plan (PIRMP).

## **EPA Licence No. 3110 Gunning Sewerage Treatment Plant and Sewerage System.**

**Biala Street, Gunning NSW 2581**

Version 1.6: - 30 January 2024

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# Upper Lachlan Shire Council

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## 1. Introduction

This plan has been developed to document the processes required to prepare for and respond to pollution incidents for the Gunning Sewerage Treatment Plant (STP) and associated sewerage system (EPA Licence No. 3110) and ensure that hazards to the environment, human health and safety are reduced, if not eliminated. It has been prepared in accordance with the requirements of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) and reflects the requirements specified in the Environment Protection Authority's Guidelines: Preparation of Pollution Incident Response Management Plans, March 2012.

### 1.1 Scope

This Pollution Incident Response Management Plan applies to Gunning STP (EPA Licence No 3110). For site plans, refer to **Appendix 1 – Site Plans**.

## 2. Pollution Incident Response Management Plan

Gunning Sewerage system which currently serves the town consists of conventional; gravity sewer reticulation and pumping stations for collection of sewage and its transport to the main Pumping Station for subsequent pumping to the Sewerage Treatment Plant (STP). During sewage treatment, chemicals and by-products are produced which, if they are spilt or incorrectly managed, may contaminate the environment or threaten human health. A register of the chemicals is contained in **Appendix 2 – Site Chemical Register**.

## 2.1 Potential Incidents

The potential hazards to the environment include:

- Sewage overflow (raw or partially treated) – potentially caused by:
  - Storms (lightning/heavy rainfall/wind) causing power failure or infrastructure damage
  - Sewerage system blockages
  - Damage to sewerage system (contractors or other damage during excavations etc.)
  - Infrastructure failure due to age
  - SCADA/Communications failure
  - Excessive flows
  - Mechanical break down
  - Power outage
  - Treatment plant blockage
- Chemical spill – potentially caused by:
  - Tank/storage failure
  - Delivery incident
  - Damage to chemical system
  - Vandalism
  - Inappropriate chemical use
  - Bund failure

Community alert and notification in the event of a spillage impacting on a water way **Section 2.3 Community Notification.**

A detailed assessment of risks is provided in **Appendix 4 – Risk assessments and actions.** For detail on actions to reduce risks see **Section 2.5 Preventative Measures** and **Appendix 5 – Action plans to minimise harm.**

## 2.2 Incident Response

This section details the response requirements in the event of an incident.

In all situations:

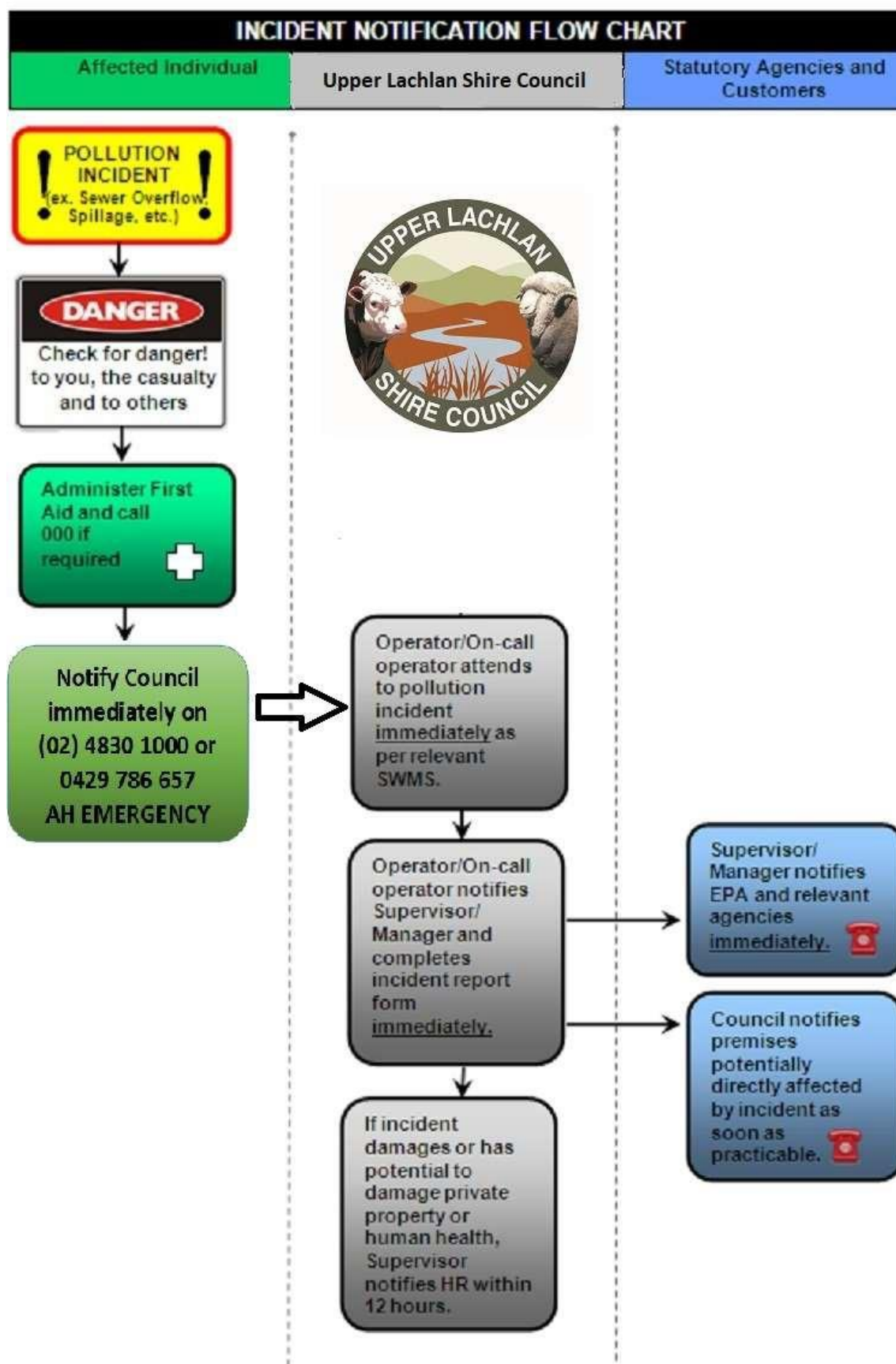
**The 24-hour emergency number for Upper Lachlan Shire Council  
is (02) 4830 1000.**

During working hours, these calls are taken by staff at the Upper Lachlan Shire Council Customer Service Centre. If the call is after hours, the call is redirected to a call centre and the on-call operator is then contacted, who will inform appropriate personnel of issues and incidents.

ULSC operates a rostered on-call system, ensuring that an experienced operator is on-call at all times. The on-call operator may also receive alarms from pump stations or the STP via the telemetry system. The telemetry system utilises the SMS mobile phone network to advise the on-call operator of critical alarms. The on-call operator also has access to other qualified staff to assist in an afterhours repair or emergency.

ULSC Pollution Incident Procedure can be seen in the following flow chart.

# Upper Lachlan Shire Council



## 2.2.1 Human Health or Safety Incident

If there is immediate threat to Human health or Safety, call triple zero “000” (“112” if using a mobile) and implement the following process:

1. If required, evacuate the site.
2. Contact Manager Water, Sewer & Waste **(0429 442 694)**.
3. Undertake reporting in accordance with the procedures listed in the ULSC WHS Hazard Incident Reporting Guidelines see **Appendix 7**
4. Report the incident to Human Resources WHS Unit **(0437 615 003)**.

## 2.2.2 Pollution Incident

During a pollution incident which involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, Upper Lachlan Shire Council must notify the following authorities immediately:

- |   |                       |
|---|-----------------------|
| 1. EPA Environment Line (written report to be provided within 7 days) | <b>131 555</b>        |
| 2. NSW Health Main  | <b>1300 066 055</b>   |
| 3. NSW Health Goulburn Office   | <b>(02) 4825 4944</b> |
| 4. NSW Health Goulburn Mobile (Tabitha Holliday)                      | <b>0407 060 237</b>   |
| 5. Dept. Industry Regional Inspector (Chris Carlon)                   | <b>0419 624 576</b>   |
| 6. SafeWork NSW   | <b>131 050</b>        |
| 7. ULSC WHS Coordinator   | <b>(02) 4830 1030</b> |
| 8. Fire & Rescue  | <b>000</b>            |

Upper Lachlan Shire Council should also consider contacting the following as soon as practical:

- |   |                          |
|---|--------------------------|
| 1. Affected neighbours  | <b>Kept at Plant</b>     |
| 2. Fisheries Watch (for reporting illegal fishing and fish kills) | <b>1800 043 536</b>      |
| 3. Chemical supplier  | <b>Refer to the MSDS</b> |
| 4. Police Crookwell   | <b>(02) 4823 1044</b>    |

For details of other contacts that might be required see **Appendix 8**

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

- Manager Governance **(02) 4830 1000**

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

- **Upper Lachlan Shire Council SWMS- Emergency Procedure, see Appendix 8.**
- **Standard Operation Procedure - Appendix 10 SOP.**



## 2.3 Community Notification.

Impacts on the community due to sewage distribution and treatment incidents are variable and depend on location, volumes of spills or other factors. Communication methods will be used on a case by case basis and in all situations Upper Lachlan Shire Council will attempt to provide early warning to directly affected premises (*either upstream or downstream depending on impacts where relevant*) by phone call or site visit. Early warning is to include details of what the imminent incident is, how those affected can prepare and respond, and provide important advice such as avoiding contact and use of affected waterways.

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

- Phone calls – Appendix 8 contains contact details for properties adjacent to the River that may use river water.
- Site visits/door knocking
- Letter drops
- Warning signs
- Other methods as the situation requires

Ensure this notification is recorded in the incident log.

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

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

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

- Phone calls
- Letter drops
- Other methods as the situation requires

### 2.3.1 Incidents at the Sewerage Treatment Plant.

Gunning STP is located approximately 1.5 kilometres to the north-west of the town of Gunning. The Gunning STP discharges to a wet land. The closest residential buildings to the site are located less than 30m south of the facility, which is less than the desirable minimum buffer distance of 400 metres. If an incident did occur and any community members or neighbours were affected, then the processes listed in **Section 2.2 Incident Response** would be implemented as required.

## 2.4 Incident Investigation.

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

- Forming the investigation team
- Coordinating the investigation

Note: Council WHS Unit has incident procedures and documentation which should be used when conducting the investigation.

A de-brief is to be conducted for all emergency incidents within 72 hours. However, the responsible manager may also initiate de-briefs for other incidents where they feel it is appropriate.

Ensure all steps are documented in the incident log for audit purposes.

## 2.5 Preventative Measures.

### 2.5.1 Physical and preventative measures.

First priority for pre-emptive measures is to eliminate substances that can become potential pollutants. If this is not possible, physical barriers should be installed to prevent pollutants from entering the environment such as bunding and spill drainage containment. At Gunning STP, all chemical storages are bunded to ensure that if the storage fails the pollutant is contained and treatment process bypasses are installed to prevent partially treated sewage spills due to sewerage system issues. Additionally, the sewerage system, pump stations, and Gunning STP have multiple alarm systems to alert operators of conditions that may result in incidents, which include:

- High level alarms
- Communication failure
- Chemical bund alarms
- Motor issue alarm
- No flow/high flow alarms

In the event that these systems fail, Upper Lachlan Shire Council has portable bypass pumps, generator and other containment options available.

## 2.5.2 Preventative monitoring and maintenance.

Upper Lachlan Shire Council uses monitoring and preventative maintenance to reduce the potential for incidents at the STP. These separated in the following timeframes:

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

### ***Daily***

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

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

### ***Weekly***

For the sewerage system and associated pump stations staff are to conduct weekly pump station checks.

### ***Monthly to Annually***

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

- Alarm testing – power fail, critical float

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

- All valve operations - exercising, maintenance. Automatic valve operator is located at Kennedy Street SPS.

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

- Backup Batteries
- Fire Extinguishers
- Overflow Plugs - inspection
- Remove grit with suck truck - Vacuum Truck
- Stink Pipe - cartridges and whirly bird - inspection
- Sump Pumps - Dry Well PS's
- Vermin/Insect Protection

The following is to be checked or conducted annually:

- Lopping and pruning of trees surrounding PS's
- Painting
- Pump Performance Testing (Drop Tests)
- Team Training - New Technologies and Upgrades
- CCTV and Jetting for repeat chokes
- Tree removal where there are repeat chokes
- Inspection and mowing of pipeline easements
- Condition assessment of above ground rising mains
- Bund integrity (STP)

Other checks include manhole inspection, maintenance, repair and resealing (as required) and inspecting and exercising Overflow Flaps (after heavy rainfall).

## 3. Training.

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

All, documentation, desktop exercises, drill debriefs and incident records are to be registered into Council's electronic record management system- "TRIM," and training records will be sent to Human Resources for filing on personnel records.

## 4. Responsibility.

Upper Lachlan Shire Council's Manager- Water and Sewer is responsible for the implementation of this Plan.

## 5. References.

- EPA NSW Environmental Guidelines: Preparation of pollution incident response plans
- Local Government Act 1993
- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations (General) Regulation 2009
- Public Health Act 1991
- Water Administration Act 1986

## 6. Glossary.

Term	Definition
PIRMP	Pollution Incident Response Management Plan
ULSC	Upper Lachlan Shire Council – The Council
PPE	Personal Protective Equipment
SOP	Standard Operating Procedure
SWMS	Safe Work Method Statement
GUN STP	Gunning Sewerage Treatment Plant
EPA	Environmental Protection Authority
DLEMO	Deputy Local Emergency Management Officer
LEMO	Local Emergency Management Officer
POEO	Protection of the Environment Operations Act 1997 (NSW)
PS	Pump Station
SES	State Emergency Services
SPS	Sewer Pump Station
SOP	Standard Operating Procedure
STP	Sewerage Treatment Plant
SWMS	Safe Work Method Statement
WHS	Work Health Safety
WHA Act.	Work Health Safety Act 2011



## 7. Appendices.

- Appendix 1 - Site Plans
- Appendix 2 – Gunning Town Map
- Appendix 3 – Gunning Sewerage Pump Station Schematic
- Appendix 4 - Site Chemical Register
- Appendix 5 - Personal Protective Equipment
- Appendix 6 - Risk assessments and actions
- Appendix 7 - Action plans to minimise harm
- Appendix 8 – Upper Lachlan Shire Council SWMS- Emergency Procedure
- Appendix 9 - ULSC OHS Hazard Incident Reporting Guidelines
- Appendix 10 - Additional Emergency Contacts
- Appendix 11 – ULSC Exceedance Notification Report Form
- Appendix 12 - Incident Notification
- Appendix 13 - SOP



## Appendix 1 - Site Plans Including Sampling Points. Gunning Sewerage Treatment Plant



 <p>Upper Lachlan Shire Council PO Box 42 Gunning NSW 2581 Telephone: 62 6038 1880 Email: <a href="mailto:info@upperlachlan.nsw.gov.au">info@upperlachlan.nsw.gov.au</a></p>	<p><b>Important Notice!</b> This map is not a precise survey instrument. It is intended for general information only and should not be used for any purpose other than that for which it was prepared. The Council is not responsible for any errors or omissions in this map. The Council is not responsible for any damage or loss resulting from the use of this map. The Council is not responsible for any damage or loss resulting from the use of this map.</p>		<p>Drawn By: Julia Wynn Projection: GDA2020 / MGA zone 55 Date: 30/01/2024 2:11 PM</p>	<p><b>NSW Environmental Protection Agency Licence No. EPL 3110 Gunning Sewerage Treatment Plant Testing Points</b> Map Scale: 1:2520 at A4</p>
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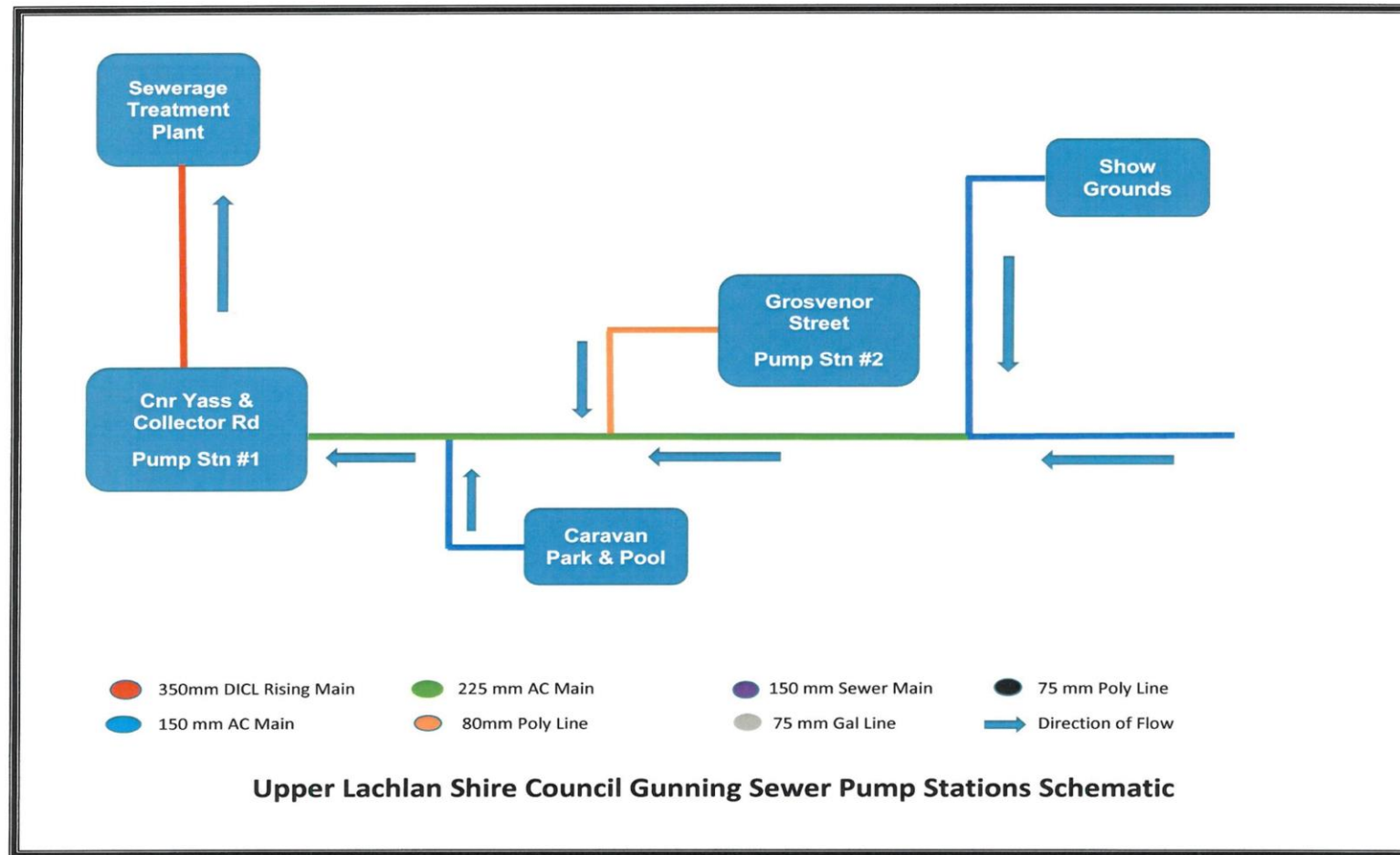


## Appendix 2 – Gunning Town Map.





## Appendix 3 – Sewerage Pump Station Schematic.



## Appendix 4 - Site Chemical Register.

Date of register: January 2021

Folder Reference	Chemical Name	Manufacturer	MSDS Issue Date	Maximum Volume of Chemicals Stored	Location Where Chemical is Stored
1	Wastewater	Gunning Township	01/06/2015	4. Megalitres	Sewerage Treatment Plant
2	Raw Sewerage	Gunning Township	24/06/2004	4 Megalitres	Sewerage Treatment Plant
3	Alpha SP 320	Castrol	7/10/2020	5 litres	Chemical Dosing Room Bunded
4	Hydrated Lime	Adelaide Brighton Cement	15/06/2017	60 kg	Chemical Dosing Room Bunded
5	Premium Heavy Duty Grease	Castrol	14/02/2018	4.5 kg	Workshop

## **Appendix 5 - Personal Protective Equipment List.**

This section list the standard PPE items required.

### **Sewerage Treatment Plant**

The following items are to be kept at the Crookwell STP:

- Ear/hearing protection
- Life rings
- Sun screen
- Rubber Gloves
- Safety glasses
- Gumboots
- Steel capped Boots

### **Sewerage system response truck**

The following items are to be kept on the sewerage system response truck:

- Asbestos kit
- Goggles/eye protection
- Hearing protection
- Apron/disposable overalls
- Rubber gloves
- Gumboots

## Appendix 6 - Risk assessments and actions

No	Risk	Impact	Risk LxC = Rating	Controls
<b>Gunning Sewerage system</b>				
CSS1	Sewage overflow due to heavy rainfall	Land contamination, possibly enter a waterway	C2 = M	<ul style="list-style-type: none"> <li>Sewerage system maintenance and rehabilitation to reduce infiltration and inflows</li> <li>Spare capacity in pump wells</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> <li>See also Appendix 7 - Action plans to minimize harm</li> </ul>
CSS2	Sewage overflow due to power failure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Lightning protection</li> <li>Backup generators</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
CSS3	Sewage overflow due to storm damaging infrastructure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Lightning protection</li> <li>Sight vegetation management to prevent damage to infrastructure</li> <li>Portable pumps</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
CSS4	Sewage overflow due to sewerage system blockages or damage	Land contamination, possibly enter a waterway	C2 = M	<ul style="list-style-type: none"> <li>Sewerage system maintenance</li> <li>Sewer Jetting program (high pressure cleaning of mains for repeat chokes)</li> <li>Spare capacity in pump wells</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
CSS5	Sewage overflow due to an external person's excavation hitting the sewers	Land contamination, possibly enter a waterway	C2 = M	<ul style="list-style-type: none"> <li>Provide underground service locations to external persons</li> <li>Telemetry designed to pick up a change in inflows</li> <li>Vacuum trucks (for clean-up)</li> <li>Portable pumps (for clean-up)</li> <li>SCADA testing and alarming</li> </ul>
CSS6	Sewage overflow due to SCADA/Communications failure	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Monitoring of SCADA signal issues</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>

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No	Risk	Impact	Risk LxC = Rating	Controls
CSS7	Sewage overflow due to Infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Reasonably Old network</li> <li>Maintenance and renewal programs</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
CSS8	Sewage overflow due to Mechanical breakdown/dual pump failure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Telemetry monitoring</li> <li>Maintenance and inspection programs</li> <li>Spare capacity in pump wells</li> <li>Portable pump to bypass site and vacuum truck to maintain flows</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
<b>Gunning Wastewater Treatment Plant</b>				
ULTP1	Sewage overflow (raw) due to heavy rainfall	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Sewerage system maintenance to reduce infiltration and inflows</li> <li>Spare capacity in pump wells</li> <li>Overflow storage at the WWTP</li> <li>Bypass systems to overflow storage pond</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP2	Sewage overflow (raw) due to storm (lightning/wind) causing power failure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Lightning protection</li> <li>Backup generators</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP3	Sewage overflow (raw) due to storm (lightning/wind) causing infrastructure damage	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Lightning protection</li> <li>Sight vegetation management to prevent damage to infrastructure</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP4	Sewage overflow (raw) due to sewerage system blockages	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Sewerage system maintenance</li> <li>Spare capacity in pump wells</li> <li>Overflow storage at the WWTP</li> <li>Bypass systems to overflow storage pond</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>

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No	Risk	Impact	Risk LxC = Rating	Controls
ULTP5	Sewage overflow (raw) due to damage to onsite sewerage system (e.g. during excavations etc.)	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Locate services prior to excavations</li> <li>Appropriate supervision of contractors</li> <li>Bypass systems</li> </ul>
ULTP6	Sewage overflow (raw) due to SCADA/Communications failure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>SCADA testing and alarming</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP7	Sewage overflow (raw) due to Infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> <li>Maintenance and renewal programs</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP8	Sewage overflow (raw) due to excessive flows	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Sewerage system maintenance to reduce infiltration and inflows</li> <li>Spare capacity in pump wells</li> <li>Overflow storage at the WWTP</li> <li>Bypass systems to overflow storage pond</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP9	Sewage overflow (raw) due to Mechanical break down	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Maintenance and inspection programs</li> <li>Spare capacity in pump wells</li> <li>Overflow storage at the WWTP</li> <li>Bypass systems to overflow storage pond</li> <li>Monitoring and maintenance</li> <li>Pre-emptive measures see Section 2.5 Preventative Measures</li> </ul>
ULTP10	Sewage overflow (raw) due to Treatment plant blockage	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> <li>Bypass systems</li> <li>Gross solid screening</li> </ul>
ULTP11	Chemical spill due to Tank/storage failure	Land contamination, possibly enter a waterway	B2 = M	<ul style="list-style-type: none"> <li>Bunding</li> <li>Alarms</li> <li>Inspection and maintenance of tanks</li> </ul>
ULTP12	Chemical spill During delivery	Land contamination, possibly enter a waterway	B2 = M	<ul style="list-style-type: none"> <li>SWMS</li> <li>PPE</li> </ul>

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No	Risk	Impact	Risk LxC = Rating	Controls
ULTP13	Chemical spill due to Damage to chemical system	Land contamination, possibly enter a waterway	A3 = M	<ul style="list-style-type: none"> <li>Locate services prior to excavations</li> <li>Appropriate supervision of contractors</li> <li>Bypass systems</li> <li>Shut off valves for chemicals</li> </ul>
ULTP14	Chemical spill due to Vandalism	Land contamination, possibly enter a waterway	A3 = M	<ul style="list-style-type: none"> <li>Site security fences</li> </ul>
ULTP15	Chemical spill due to Bund failure	Land contamination, possibly enter a waterway	B3 = M	<ul style="list-style-type: none"> <li>Bund inspections</li> <li>Annual bunding tests</li> <li>Maintenance and renewal</li> </ul>
ULTP16	Chemical truck incident outside of bundled area	Land contamination, possibly enter a waterway	B3 = M	<ul style="list-style-type: none"> <li>Only use transport companies with evidence of driver licensing and training</li> <li>Operator onsite during deliveries (or at minimum direct contact with deliver in exceptional circumstances)</li> </ul>

Likelihood	Consequences	Rating		Likelihood				
A <b>IMPROBABLE</b> - May occur only in exceptional circumstances	1. <b>INSIGNIFICANT</b> - No injuries, minimal level of pollution, Employee grievances dealt with on site, Loss <5% of job cost, service, business failure resulting in delay < 1 week and costs, plant/equipment loss < \$1,000	L = Low	Consequence	A	B	C	D	E
B <b>REMOTE</b> - Could occur at some time	2. <b>MINOR</b> - First aid treatment, limited/localised impact, Employee grievances dealt with by senior management, loss 5-10% of job cost, business failure resulting in delay < 1 month and costs, plant/equipment loss < \$10,000	M = Medium	1	L	L	L	M	H
C <b>OCCASIONAL</b> - Might occur at some time	3. <b>MODERATE</b> - Medical treatment & several days off work, significant pollution requiring outside assistance, Employee grievances taken to the union, loss 10-20% of job cost, non-compliance with legislation/Licence conditions, business failure resulting in delay < 3 months and costs, plant/equipment loss < \$50,000	H = High	2	L	L	M	H	V
D <b>FREQUENT</b> - Will probably occur in most circumstances	4. <b>MAJOR</b> - long term illness/serious injury, significant pollution requiring outside assistance & long term environ damage, threatened industrial action, loss 20-70% of job cost, loss of production capability, order placed on Council by Authorities, business failure resulting in delay < 6 months and costs, plant/equipment loss < \$100,000	V = Very High	3	M	M	H	V	X
E <b>CONTINUOUS</b> - Is expected to occur in most circumstances	5. <b>CATASTROPHIC</b> - Death or permanent disability/illness, serious permanent environmental damage, Actual industrial action, loss >70% of job cost, potential prosecution by Authorities, business failure resulting in delay > 6 months and costs, plant/equipment loss > \$100,000	X = Extreme	4	H	H	V	X	X
Refer also to Councils Hazards, Risks and Controls Guidelines			5	V	V	X	X	X

## Appendix 7 - Action plans to minimise harm.

To address the risk of sewer overflows, Upper Lachlan Shire Council has a number of management actions comprising of one or more of the following:

- Further detailed Investigations of very high and extreme risks
- Planned Maintenance of Existing Assets
- Planned Renewal of Existing Assets
- Telemetry Monitoring of the WWTP and Sewage Pumping Stations
- Continuous Improvement of Sewerage System Operations
- Emergency Response Procedure to Power Failures
- Incident Response Protocol

## Appendix 8 – Upper Lachlan Shire Council SWMS- Emergency Procedure.

### Specific Incident: Fuel / Chemical Spills / Raw sewage:

1. Eliminate the source of the spill immediately – if it is safe to do so.
2. Contain the spill. Use the material in the spill kit to contain the spill and control the flow as necessary.
3. If required stop the spill from entering any stormwater or water course by blocking entry point inlets.
4. After referring to the relevant MSDS, clean up the spill quickly, even small ones, as they can easily flow into stormwater drains or be washed there by rain.
5. Take used Absorbent materials (loose or contained) to a licensed disposal station/facility.

### General Incident:

These procedures relate to emergencies that may occur on site at the depot or any remote site that you are at.

Emergencies can include: Fuel leak/spillage, Chemical Spill, Work or traffic accident, personnel illness or violence incident.

1. Identify the type of incident and its severity EG: is it an Accident, Abuse, Dry Weather Sewage Overflow, Fuel or Chemical spillage, Fire or explosion.
2. Are people at risk, how many and who.
3. If possible, identify chemicals involved EG: name or UN/Class.
4. For Vehicle Accidents, Fires or HAZMAT Spills notify the emergency services: phone – **000** or **112** for mobiles.  
(Note: this number can be used on mobiles even when there is no signal showing)
5. For Storm and tempest emergency situations phone **132500** SES if they cannot be raised phone **000**.



6. Inform the Manager or Coordinator Water, Sewer & Waste of all incidents immediately.
7. Clear the area of personnel and control traffic as required. Employees are to proceed to a safe area (site compound or Muster area) so they can be accounted for.
8. Remain upwind of the incident scene if it is a sewage, chemical or fuel spill involving smoke or fumes.
9. Where possible, confine the incident and prevent the spread of its affects without endangering personnel.
10. Move to high ground if flooding occurs and remain until everyone is accounted for.
11. Notify potentially affected residents.
12. Assist injured people if safe to do so.
13. If safe to do so use fire extinguishers to bring fire under control. Under no circumstance attempt to extinguish fires involving hazardous substances.
14. Obey instructions from Emergency Services personnel.

**The impact of emergencies includes:**

- *Danger or threat to people's health or safety*
- *Environmental damage*
- *Damage or threat to property*
- *Storm / Tempest and Floods*

## Appendix 9 - ULSC WHS Hazard Incident Reporting Guidelines.

1. Identify the type of incident and its severity EG: is it an Accident, Abuse, Fuel or Chemical spillage, Fire or explosion
2. Operator completed a ULSC **WHS 001a Accident/Incident/Near Miss Report** within 12 hours. This can be found on Council's Website.
3. Operator informs either one of the following supervisors:
  - a. Manager- Water, Sewer & Waste **0429 442 694**
  - b. WHS Officer **0437 615 003**
  - c.
4. Supervisor reports incident to the Environmental Protection Authority on **131 555**
5. Record all steps in the Incident Log.

## Appendix 10 - Additional Emergency Contacts.





## UPPER LACHLAN SHIRE COUNCIL

**(02) 4830 1000**

Organization	Contact Person Details (Name, position, etc.)	Telephone Number
Emergency Services	Fire, Police, Ambulance	<b>000</b>
Crookwell Police	33 Goulburn St, Crookwell NSW 2583	<b>(02) 4832 1044</b>
Gunning Police	Warrataw St, Gunning NSW 2581	<b>(02) 4845 1244</b>
Taralga Police	MacArthur St, Taralga NSW 2580	<b>(02) 4840 2044</b>
Crookwell Fire & Rescue	157 Goulburn St, Crookwell NSW 2583	<b>(02) 4832 1601</b>
Gunning Rural Fire Service	26 Nelanglo St, Gunning NSW 2581	<b>000 or 1800 679 737</b>
Taralga Rural Fire Service	Orchard Street, Taralga NSW 2580	<b>000 or 1800 679 737</b>
LEMO's Upper Lachlan Shire Council.	ULSC – Robert Johnson LEMO ULSC – Shelley Knight DLEMO	<b>(02) 4830 1034 (02) 4830 1053</b>
NSW Water	Sydney / Lachlan Water Management Area.	<b>(02) 9338 6600 or 1300 722 468</b>
Crookwell Health Care Centre	17 Kialla Road, Crookwell NSW 2583	<b>(02) 4843 2500</b>
Crookwell Hospital	Kialla Road Crookwell, NSW 2583	<b>(02) 4837 5000</b> 24 Hrs / 7 Days
Goulburn Hospital	130 Goldsmith St, Goulburn NSW 2580	<b>(02) 4827 3111</b> 24 Hrs / 7 Days
NSW Public Health (Goulburn)	Ms Tabitha Holliday tabitha.holliday@health.nsw.gov.au	<b>0407 060 237</b>
NSW Poisons Information Centre	Westmead Children's Hospital	<b>13 11 26</b>

Organization	Contact Person Details (Name, position, etc.)	Telephone Number
NSW Fisheries	5 O'Keeffe Ave, Nowra NSW 2541	<b>(02) 6391 3100</b>
ULSC Director Environment & Planning	Simon Arkinstall	<b>(02) 4830 1024</b>
ULSC Manager of Water, Sewer & Waste	John Meere	<b>0429 442 694</b>
ULSC WHS Coordinator	Leagh-Anne Cosgrove	<b>(02) 4830 1030</b>
ULSC Media Officer	Chris Gordon	<b>(02) 4830 1000</b>

## Appendix 11 - Exceedance Notification for Sewerage Treatment Plant.



Upper Lachlan Shire Council – SEWER TREATMENT PLANT

### RELEASE EXCEEDANCE NOTIFICATION

<p><i>ATTACH ALL TEST RESULTS AND PHOTOS, AS REQUIRED FOR EVENT REPORTING</i></p>			
<b>AUTHORISATIONS / EPA REPORTING: (Office Use Only)</b>			
<b>Reporting Officer:</b>		<b>Date:</b>	
<b>Position:</b>			
EPA Report Phone: 131 555 or South East – Queanbeyan Office (02) 6229 7002 (9:00am – 5:00pm) E-mail notifications and correspondence to; queanbeyan@epa.nsw.gov.au			
<b>Time:</b>		<b>Event / Log Reference:</b>	
<b>Follow-up:</b>		<b>Due Date:</b>	
<i>Protection of the Environment Operations Act 1997.</i>			

Once completed please send this form and any attachments either:  
In person at your local Upper Lachlan Shire Council Office  
or e-mail to [council@upperlachlan.gov.au](mailto:council@upperlachlan.gov.au) or  
CHIEF EXECUTIVE OFFICE  
UPPER LACHLAN SHIRE COUNCIL  
PO BOX 42, GUNNING NSW 2581



Upper Lachlan Shire Council – SEWER TREATMENT PLANT

## RELEASE EXCEEDANCE NOTIFICATION

ULSC	
Received Date:	
Entered By:	
TRIM Doc ID:	

Upper Lachlan Shire Council is collecting information supplied on this form in accordance with the *Protection of the Environment Operations Act, 1997*. Information will be accessed by persons who have been authorised to do so. Information will not be given to any other person or agency unless required by law. Personal information is handled in accordance with the *Privacy Information Act 2000*.

DETAILS					
Time of Sample		Date of Sample	20/11/2023	Plant Location	CROOKWELL STP
EPA LICENCE No.	1938	Name of Person Reporting	David Scott		
PARAMETER EXCEEDED	RELEASE LIMIT	RESULT	YES	NO	
Biological Oxygen Demand	20 mg/L (maximum)	8			
Total Suspended Solids	30 mg/L (maximum)	42			
pH	6.5 – 8.5 (range)	10.9			
Faecal Coliforms (organisms)	200 cfu/100ml (maximum)	6			
Nitrogen (Ammonia)	5mg/L (maximum)	<0.1			
Nitrogen Total	15 mg/L (maximum)	7.96			
Oil & Grease	10 mg/L	<1			
Phosphorus (Total)	1 mg/L	0.7			
Chlorophyll-a	>100µg/L	380			
Volume / Mass Limit	>8,078 ltrs./ day (Point 2)				
EXCEEDANCE CAUSE:					
<input type="checkbox"/> Equipment failure	<input type="checkbox"/> Telemetry failure	<input type="checkbox"/> Algal Bloom (>100µg/L)			
<input type="checkbox"/> Weather event / Infiltration	<input type="checkbox"/> Excess plant demand	<input checked="" type="checkbox"/> <u>Unknown</u> Provide Details Below:			
<input type="checkbox"/> Operator error/experience	<input type="checkbox"/> Non-natural disaster event				
CORRECTIVE ACTIONS & ADDITIONAL INFORMATION.					

## Appendix 12 - Incident Notification for sewerage spill or overflow.

### Incident Notification for sewerage spill or overflow

PLACE YOUR  
COUNCIL LOGO HERE

Dear  DATE   
Overflow at  EPA Ref #   
EPA Licence #  of  Sewerage Scheme.

Following our initial telephone call, we are advising you in writing (Refer to R4 of Licence) of more details of a sewage spill or overflow that Council experienced at  am/pm on

The overflow was caused by

Once Council staff became aware of the overflow, the EPA and  were notified immediately and corrective measures were put in place.

(Refer to Condition M9) of Licence, requires that Council record the following details in relation to each observed or reported overflow from the reticulation system and from the sewage treatment plant:

- a) The location of the overflow:
- b) The date, the estimated start time and estimated duration of the overflow:
- c) The estimated volume of the overflow (litres):
- d) A description of the receiving environment of the overflow:
- e) Classification as a dry or wet weather overflow:
- f) The probable cause of the overflow:
- g) Any actions taken to stop the overflow happening:
- h) Any action taken to clean up the overflow:
- i) Any actions taken to prevent the overflow happening again:

Additionally, sampling was undertaken at  and the results of these samples are attached.

Yours faithfully,

NAME  SIGNATURE  DATE

APPROVED BY  GROUP  DOCUMENT ID  VERSION   
ISSUED  REVISED  STATUS  PAGE

## Appendix 13 – SOP.

### Standard Operational Procedure to cover the areas of concern in the event of a Pollution Incident Response.

#### Purpose.

The purpose of this SOP is to detail the correct actions for securing a site where a pollution incident has occurred and the preventative measures to be undertaken to minimise the risk of the incident escalating.

#### Scope.

This procedure applies to sites where

- a pollution incident has occurred

This procedure is intended to be used by staff who are generally familiar with the water and sewer systems managed by Council.

As a pollution incident can vary widely in nature the SOP is primarily focused on providing an orderly thought process as the management of the event unfolds.

#### Responsibilities.

Role	Responsible for
Water and Wastewater staff.	Responding to pollution incidents, performing corrective action tasks, reporting responses to the relevant person or authority.
Manager / Supervisor - Treatment and or Maintenance.	Primary Incident Controller Overseeing the response to the incident to ensure WHS and POEO related issues are addressed.
WHS Officer	Manages WHS and Human H&S Training of Incident Response personnel.
ULSC Environmental Coordinator	In the case of a large incident, investigates non compliances.
Coordinator Water Sewer and Waste	Post Incident Auditor and Incident Observer. Review and Management of Incident Management Plans. Public Safety Plans and associated documents. Training of Incident Response personnel.
ULSC Local Emergency Management Coordinator (LEMO)	LEMO may be required in the event of a large incident to Incident Control

## Key Safety Plant/Equipment and PPE.

- Protective clothing and footwear
- Protective gloves
- Ear plugs
- Reflective vests
- Sun hat and sun screen cream
- 4WD & Mobile Phone/2-way radio

## Procedures.

In the event of an incident, the following steps are to be undertaken: -

- Isolate the Site.
  - In the event of a pollution incident the site must be isolated to prevent unauthorised entry. This may be in the form of barrier boards and/or parawebbing fence. The site once defined will be attended by an authorised Council employee until the incident is addressed and the site made safe.
- Apply First Aid if required to any injured or contaminated persons.
- Remove any persons or animals from potential harm.
- Preserve the site.
  - Ensure the site is preserved for incident investigation.
- Notify Incident Controller & WHS Officer.
- Notify Emergency Services.
- Control the pollution incident. Manage the incident until such time as the spill ceases and is made safe.
  - Shut down pumps,
  - Apply bund,
  - Apply appropriate control methodology
  - Initiate testing procedures
  - Prevent escalation of the incident.
- Advise downstream landholders.
- Advise EPA.
- Follow sewer safety procedures post incident for PPE.
- Record all steps taken in the Incident Log.
- Prepare Release Exceedance Notice and return to the EPA within 48 hours.
- Initiate post incident testing and monitoring.
- Initiate contaminated soil removal procedure.
- Hold an all-responding ULSC personnel de-brief within 72.
- Prepare a Lessons Learned document.
- Send all documentation to the Incident Auditor for compliance audit and document review.

## Communication.

- Notify management. Alert any immediate neighbors of the potential hazard.
- When completed communicate with the various stakeholders to let them know the incident has been managed and is no longer a threat.



## Preventing an Escalation.

1. In the event the pollution is made worse by the operation of a pump station then the pump station is to be shut down or if this is not possible then the pollution site to be by-passed using up-stream and down-stream manholes (in the case of sewerage surcharge) and portable pumping equipment. If by-passing is not practical, then consider engaging the use of a tanker to transport any liquids to a suitable disposal location.
2. **Bunding:** To prevent contaminating surrounding areas appropriate bunding must be put in place as soon as it is safe to do so. These can be in the form of earthen bunds using the material on site. Using sand bags, hay bales, black plastic or HAZCHEM socks, to contain the polluting material or substance. Once the incident is controlled any polluted material is to be collected and disposed either at the landfill or the sewer treatment plant. If the polluted material is of a toxic nature (e.g.: chemical) then disposal will require the engagement of specialist service providers.

## Records.

### Timeline of Events:

1. Ensure the course of events and critical decisions are recorded during the management of the incident. These may only be in the form of dates, times and dot points which will act as memory stimulants when a formal report is completed.
2. If the incident is a sewerage surcharge, then complete the "Incident Notification ".  
**See Appendix 13 of this PIRMP.**

### Clean Up:

1. Ensure a thorough clean-up of the area is carried out once the incident is rectified
  - a. For sewer surcharge disinfect the affected area.
  - b. For toxic chemicals remove and bag the affected soil and back-fill with new material
  - c. Remove all signage and barrier fencing.

## References.

File Number	Description (File)	Status	Location
SWMS	Emergency Procedures	Current	See <a href="#">Appendix 9</a> of the PIRMP