



Pollution Incident Response Management Plan (PIRMP).

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

Biala Street, Gunning NSW 2581

Version 1.7: - 01 August 2024

Annual Review: - 01 July 2025

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Document Control			
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2	Craig Bindoff (March 2021)	Tom Baldwin	Glenn Lacey
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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 *NSW Protection of the Environment Operations Act 1997 (POEO 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 5 – Site Chemical Register**.

An Emergency Operational Procedure is contained in **Appendix 10** to assist Operators and Controllers to follow the steps required to respond to incidents involving spills.

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
 - Illegal dumping into sewer manholes.

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 7 – Risk assessments and actions.**

2.2 Incident Response

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

In all situations, notifications from the Public :

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

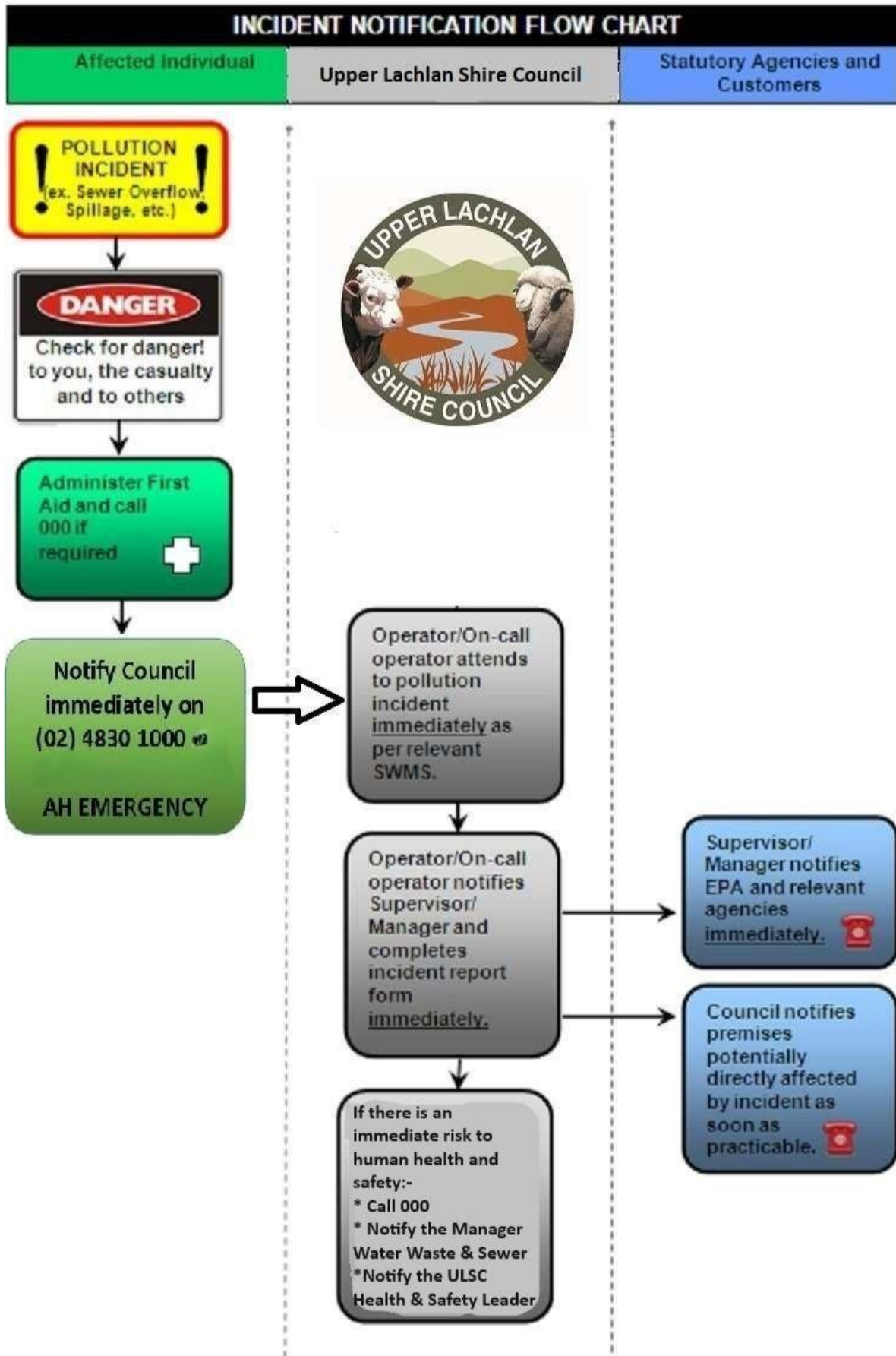
During working hours, these calls are taken by Customer Service staff at Upper Lachlan Shire Council.

If the call is after-hours, the call is redirected to a call center and the on-call operator is then contacted, who will inform appropriate personnel of issues and incidents.

ULSC operates a rostered on-call system for Water and Sewer Operators, ensuring that an experienced operator is on-call at all times. The on-call operator also has access to other qualified staff to assist in an after-hours emergency. The On-Call Water and Sewer Operator will ring the Manager Water, Sewer and Waste or Coordinator Water, Sewer and Waste should a call be directed to them.

The following flow chart is the ULSC Pollution Incident Procedure.

(Please note this flow chart is being updated to fully reflect the Emergency Operating Procedure contained in **Appendix 10**.)



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 and Sewer (**0492 442 694**).
3. Undertake reporting in accordance with the procedures listed in the ULSC Emergency Operating Procedure see **Appendix 11**
4. Report the incident to Health & Safety Leader (**0437 615 003**)
5. In the event of a major incident requiring more resources, the Manager Water Waste and Sewer may request assistance from the LEMO.

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) | 131 555 |
| 2. NSW Health Main | 1300 066 055 |
| 3. NSW Health Goulburn Office | (02) 4825 4944 |
| 4. NSW Health Goulburn Mobile (Tabitha Holliday) | 0407 060 237 |
| 5. Dept. Industry Regional Inspector (Chris Carlon) | 0419 624 576 |
| 6. SafeWork NSW | 131 050 |
| 7. ULSC WHS Coordinator | (02) 4830 1030 |
| 8. Fire & Rescue | 000 |

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

- | | |
|---|--------------------------|
| 1. Affected neighbours | Kept at Plant |
| 2. Fisheries Watch (for reporting illegal fishing and fish kills) | 1800 043 536 |
| 3. Chemical supplier | Refer to the MSDS |
| 4. Police Gunning | (02) 4824 9270 |

For details of other contacts that might be required see **Appendix 2 and 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:

- **Emergency Operating Procedure – Appendix 10**
- **Risk Assessments & Actions – Appendix 7**

SWMS and SWI's relating to the Emergency Operating Procedure are being redeveloped on the next license period in consultation with Water, Sewer and Waste Operators and the Health & Safety Leader.

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.

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:

- Site visits/door knocking
- Letter drops
- Warning signs
- Other methods as the situation requires, such as social media.

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 stock usage, swimming, fishing, and boating until contamination has cleared. Additionally, if the event occurred or was occurring during dry weather, Upper Lachlan Shire Council staff 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 e.g. local radio alert to restrict stock and domestic use access.
- Ensure that steps taken are noted in the Incident Log with time and date they were undertaken.

2.3.1 Incidents at the Sewerage Treatment Plant.

Gunning STP is located approximately 1.5 kilometres to the north-west of the town centre 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.

This may include an air pollution alert under PEPO due to the proximity of dwelling to the facility.

2.4 Incident Investigation.

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

- Forming the investigation team
- Co-coordinating the investigation

Ensure that steps taken are noted in the Incident Log with time and date they were undertaken.

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

2.5 Preventative Measures.

The following preventative measures are undertaken by ULSC to prevent or minimise pollution incidents throughout the year.

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
- Mechanical failure and level sensors
- 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 STP is attended daily and the following undertaken:

- Maintenance tasks;
- Check brush aerators;
- Clean screens and wash, dispose of rags;
- Plant performance data is checked and entered;
- Housekeeping issues that requiring attention;
- Vandalism and/or theft checks;
- Check all Alarms are working;
- Pump Station at Yass St and Grosvenor St checked for correct operation.

Weekly

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

- Check & clean Pasveer system;
- Maintenance of cables, ropes;
- Vegetation maintenance activities;
- Building maintenance activities;
- All other Pump Stations are checked for correct operation once or twice weekly.

Monthly to Annually

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

- Alarm testing – power fail, critical float;
- Valve operation in Pump Stations;
- EPA testing.

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

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

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

- Backup Batteries
- Fire Extinguishers
- Overflow Plugs - inspection
- Vermin/Insect Protection

- Change membrane on Oxygen Meter.
- All lifting equipment is tested.

Annually, the following tasks are undertaken:-

- Maintenance of gear boxes on decant;
- Check wire rope;
- Replace filter screens and oils.
- Pump performance testing (drop tests)
- Bund integrity
- Tree maintenance

Every **2 years**, the following tasks are undertaken:-

- Replacement of decant cables.

Every **5 years**, the following tasks are undertaken:-

- Replacement of decant rubbers.

ULSC has programs currently underway of:-

- Planned maintenance and replacement works;
- Smoke testing of failures to assess stormwater infiltration and condition of the asset where incidents have occurred;
- Update of Safety and Emergency Management procedures; and;
- Staff training.

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. Governing Legislation.

- EPA License No. 3110 Gunning Sewerage Treatment Plant
- 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 – Compulsory and Optional Downstream Landholders
- Appendix 3 – Gunning Sewerage Pump Station Schematic
- Appendix 4 - Map Gunning EPA License Monitoring Points
- Appendix 5 - Site Chemical Register
- Appendix 6 - Personal Protective Equipment
- Appendix 7 - Risk Assessments and Actions
- Appendix 8 – Additional Emergency Contacts
- Appendix 9 - Incident Notification Forms
- Appendix 10 – Emergency Operating Procedure

Appendix 1 - Site Plans Gunning Sewerage Treatment Plant



 <p>Upper Lachlan Shire Council PO Box 42 Gunning NSW 2581 Telephone: 02 6838 1883 Email: info@ulsh.nsw.gov.au</p>	<p>Important Notice! This map is not a professional survey. It is intended for information purposes only. The Council does not warrant the accuracy of the information for any purpose other than the purpose for which it was prepared. The Council is not responsible for any loss or damage caused by the use of this map. The Council is not responsible for any loss or damage caused by the use of this map.</p>		Drawn By:	Julia Wynn	<p>NSW Environmental Protection Agency Licence No. EPL 3110 Gunning Sewerage Treatment Plant Testing Points Map Scale: 1:2520 at A4</p>
			Projection:	GDA2020 / MGA zone 55	
			Date:	30/01/2024 2:11 PM	

Appendix 2- Downstream Landholder Notifications

The EPA requires ULSC notify downstream landholders for approximately 5km of river mileage. At 5.3km downstream of EPA Test Point 1, Meadow Creek Joins the Lachlan River, downstream of the ULSC Water Extraction Point. ULSC considers this junction to be the point to end the notification list.

Compulsory Notifications:-

Incidents from Gunning STP discharge into Meadow Creek then Meadow Creek Traverses private land until it reaches the Lachlan River.

Incidents from Yass Street Pump Station enter Meadow Creek then onto ULSC land and then as per the Gunning STP Notifications.

Incidents from Grosvenor St Pump Station enter Railway land then into a drain across private land

All downstream private landholders must be notified of a pollution event.



A Confidential list of landholders not published on ULSC's web site is available to Operators at Gunning STP and Crookwell ULSC Water Sewer & Waste Office. **This list is not published on ULSC's web site due to privacy requirements.**

Optional Notifications:-

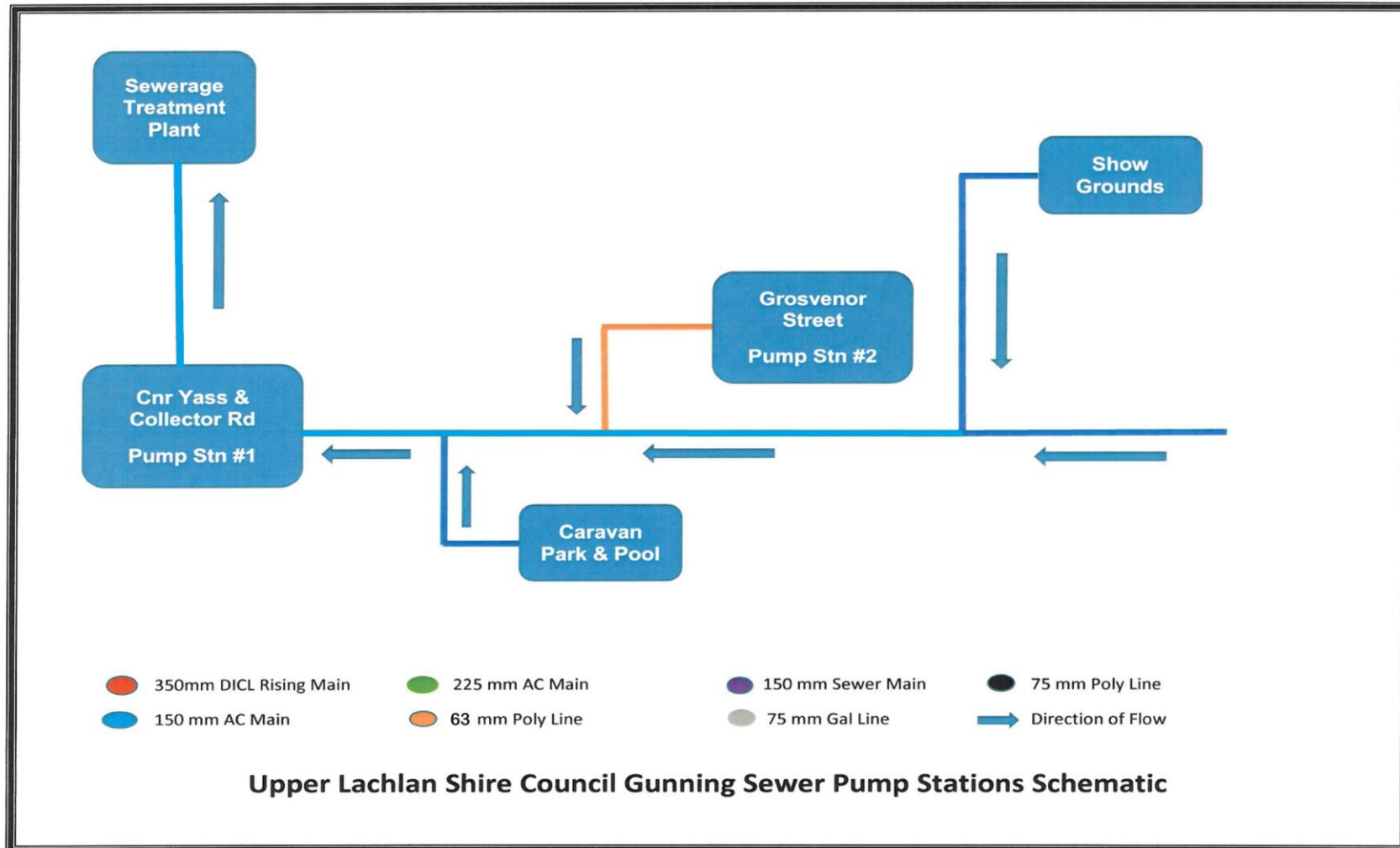
Due to Meadow Creek flowing through private land, there are no optional notifications.

Below is the map of lots adjacent to affected lots.





 <p>Upper Lachlan Shire Council PO Box 42 Gunning NSW 2581 Telephone: 02 4538 1000 Email: ouncil@upperlachlan.nsw.gov.au</p>	<p>Important Notice!</p> <p>This map is made to assist the community in understanding the location of the sewerage treatment plant and the sewerage system. It is not intended to be used as a legal document. 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 liability, loss or damage, whether direct or indirect, arising from the use of this map. The council is not responsible for any liability, loss or damage, whether direct or indirect, arising from the use of this map.</p>		Draw n By: Julia Wynn	<p>Gunning Sewerage Treatment Plant Adjacent Landholder Map Map Scale: 1:5038 at A4</p>
			Projection: GDA2020 / MGA zone 55	
			Date: 31/01/2024 12:34 PM	

Appendix 3 – Sewerage Pump Station Schematic.



Appendix 4 - Gunning EPA Monitoring Points



 <p>Upper Lachlan Shire Council PO Box 42 Gunning NSW 2581 Telephone: (62) 4838 1881 Email: info@upperlachlan.nsw.gov.au</p>	<p>Important Notice! This map is not a professional document. It is provided for information only and should not be used for any legal or financial purposes. 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. The Council is not responsible for any damage or loss resulting from the use of this map.</p>		<p>Drawn By: Julia Wynn Project: GDA2020 / MGA zone 55 Date: 30/01/2024 2:11 PM</p>	<p>NSW Environmental Protection Agency Licence No. EPL 3110 Gunning Sewerage Treatment Plant Testing Points Map Scale: 1:2520 at A4</p>
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Appendix 5 - Site Chemical Register.

Date of register: 01 January 2024

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 6 - Personal Protective Equipment List.

This section list the standard PPE items required.

All Incidents require the following equipment

- High visibility protective clothing and footwear
- Protective gloves – rubber to elbow and disposable nitrile
- Ear plugs
- Eye protection
- Face masks
- Reflective vests
- Sun hat and sun screen cream
- 4WD & Mobile Phone/2 way radio
- Spill, Signage & Barriers
- Disinfection equipment e.g. lime.

Additionally, the Sewerage Treatment Plant is to keep:

- Floatation vests
- Safety Boots (NOT Gumboots)
- Gas Monitor
- Spill kit

Additionally, the Sewerage system response truck is to keep:-

- Asbestos kit
- Apron/disposable overalls
- Gumboots

Please Note: - Gumboots are **not** to be used within the Sewerage Treatment Plant near deep water zones without a self-inflating floatation vest as they pose a safety risk to workers. Gumboots may be used away from deep water zones for wash downs, etc.

Appendix 7 - Risk assessments and actions

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

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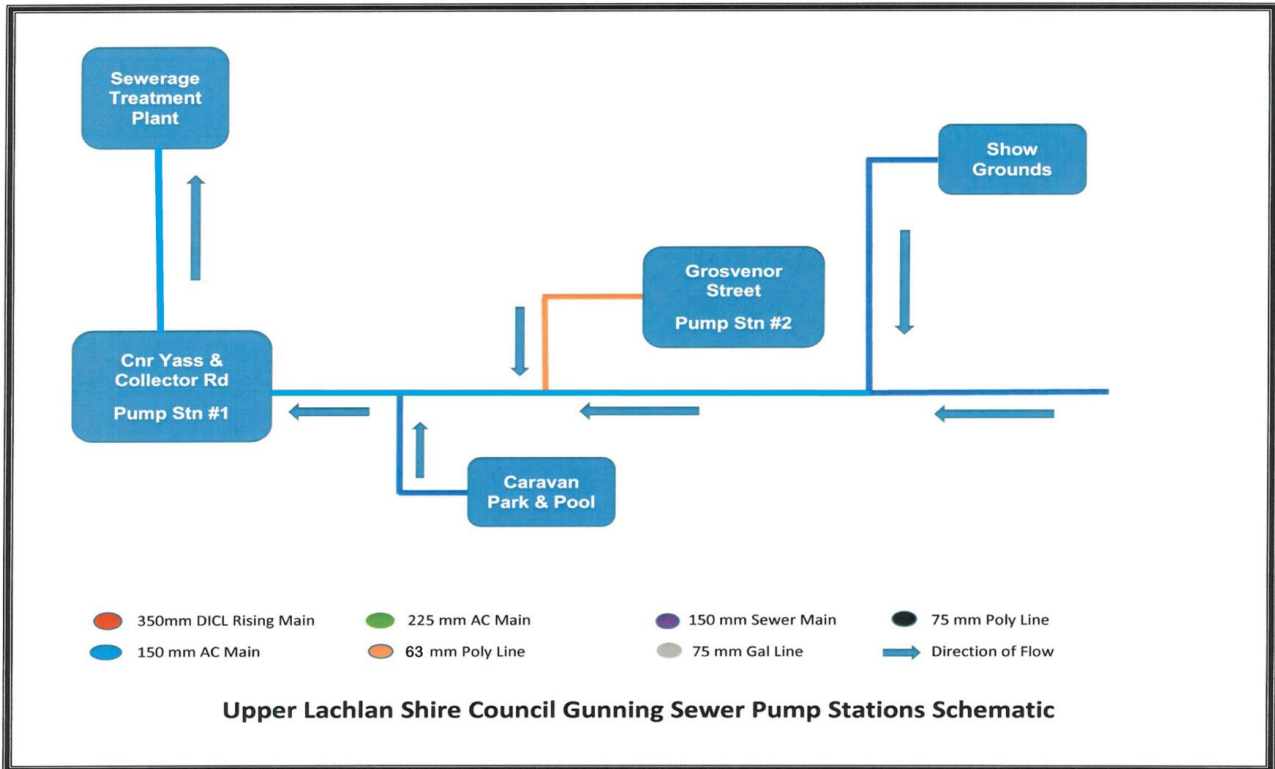
No	Risk	Impact	Risk LxC = Rating	Controls
CSS7	Sewage overflow due to Infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> ▪ Reasonably Old network ▪ Maintenance and renewal programs ▪ Pre-emptive measures see Section 2.5 Preventative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

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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"> ▪ Locate services prior to excavations ▪ Appropriate supervision of contractors ▪ Bypass systems
ULTP6	Sewage overflow (raw) due to SCADA/Communications failure	Land contamination, possibly enter a waterway	B2 = L	<ul style="list-style-type: none"> ▪ SCADA testing and alarming ▪ Pre-emptive measures see Section 2.5 Preventative Measures
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"> ▪ Maintenance and renewal programs ▪ Pre-emptive measures see Section 2.5 Preventative Measures
ULTP8	Sewage overflow (raw) due to excessive flows	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> ▪ Sewerage system maintenance to reduce infiltration and inflows ▪ Spare capacity in pump wells ▪ Overflow storage at the WWTP ▪ Bypass systems to overflow storage pond ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Preventative Measures
ULTP9	Sewage overflow (raw) due to Mechanical break down	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> ▪ Maintenance and inspection programs ▪ Spare capacity in pump wells ▪ Overflow storage at the WWTP ▪ Bypass systems to overflow storage pond ▪ Monitoring and maintenance ▪ Pre-emptive measures see Section 2.5 Preventative Measures
ULTP10	Sewage overflow (raw) due to Treatment plant blockage	Land contamination, possibly enter a waterway	A2 = L	<ul style="list-style-type: none"> ▪ Bypass systems ▪ Gross solid screening

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



Appendix 8 - Additional Emergency Contacts.

		<h2 style="margin: 0;">UPPER LACHLAN SHIRE COUNCIL</h2> <h3 style="margin: 0;">(02) 4830 1000</h3>
Organization	Contact Person Details (Name, position, etc.)	Telephone Number
Emergency Services	Fire, Police, Ambulance	000
Crookwell Police	33 Goulburn St, Crookwell NSW 2583	(02) 4832 1044
Gunning Police	Warrataw St, Gunning NSW 2581	(02) 4845 1244
Taralga Police	MacArthur St, Taralga NSW 2580	(02) 4840 2044
Crookwell Fire & Rescue	157 Goulburn St, Crookwell NSW 2583	(02) 4832 1601

Upper Lachlan Shire Council

Gunning Rural Fire Service	26 Nelanglo St, Gunning NSW 2581	000 or 1800 679 737
Taralga Rural Fire Service	Orchard Street, Taralga NSW 2580	000 or 1800 679 737
LEMO's Upper Lachlan Shire Council.	ULSC – Robert Johnson LEMO ULSC – Shelley Knight DLEMO	(02) 4830 1034 (02) 4830 1053
NSW Water	Sydney / Lachlan Water Management Area.	(02) 9338 6600 or 1300 722 468
Crookwell Health Care Centre	17 Kialla Road, Crookwell NSW 2583	(02) 4843 2500
Crookwell Hospital	Kialla Road Crookwell, NSW 2583	(02) 4837 5000 24 Hrs / 7 Days
Goulburn Hospital	130 Goldsmith St, Goulburn NSW 2580	(02) 4827 3111 24 Hrs / 7 Days
NSW Public Health (Goulburn)	Ms Tabitha Holliday tabitha.holliday@health.nsw.gov.au	0407 060 237
NSW Poisons Information Centre	Westmead Children's Hospital	13 11 26

Organization	Contact Person Details (Name, position, etc.)	Telephone Number
NSW Fisheries	5 O'Keeffe Ave, Nowra NSW 2541	(02) 4424 7400
ULSC Acting Director Environment & Planning	Simon Arkinstall	(02) 4830 1024
ULSC Manager of Water, Sewer & Waste	John Meere	0492 442 694
ULSC Media Officer		(02) 4830 1000
ULSC Health & Safety Leader	Leagh-Anne Cosgrove	0437 615 003

Appendix 9 – Incident Notification Forms



Upper Lachlan Shire Council – SEWER TREATMENT PLANT
RELEASE EXCEEDANCE NOTIFICATION

UL SC
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 2009.

DETAILS [Gunning - Location of Exceedance]					
Time of Sample		Date of Sample		Plant Location	Gunning STP
EPA LICENCE No.	3110	Name of Person Reporting			
PARAMETER EXCEEDED	RELEASE LIMIT	RESULT	YES	NO	
Biological Oxygen Demand	20 mg/L (maximum)				
Total Suspended Solids	30 mg/L (maximum)				
pH	6.5 – 8.5 (range)				
Faecal Coliforms (organisms)	200 cfu /100ml (maximum)				
Nitrogen (Ammonia)	5mg/L (maximum)				
Nitrogen Total	15 mg/L (maximum)				
Oil & Grease	10 mg/L				
Phosphorus (Total)	1 mg/L				
Chlorophyll-a	>100µg/L				
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 type="checkbox"/> Unknown <i>Provide Details Below.</i>			
<input type="checkbox"/> Operator error/experience	<input type="checkbox"/> Non-natural disaster event				

DETAILS [Type here]					
Time of Sample		Date of Sample		Plant Location	CROOKWELL STP
EPA LICENCE No.	1938	Name of Person Reporting			
PARAMETER EXCEEDED	RELEASE LIMIT	RESULT	YES	NO	
Biological Oxygen Demand	20 mg/L (maximum)				
Total Suspended Solids	30 mg/L (maximum)				
pH	6.5 – 8.5 (range)				
Faecal Coliforms (organisms)	200 cfu /100ml (maximum)				
Nitrogen (Ammonia)	5mg/L (maximum)				
Nitrogen Total	15 mg/L (maximum)				
Oil & Grease	10 mg/L				
Phosphorus (Total)	1 mg/L				



Upper Lachlan Shire Council – SEWER TREATMENT PLANT
RELEASE EXCEEDANCE NOTIFICATION

Chlorophyll-a	>100µg/L			
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 type="checkbox"/> Unknown <i>Provide Details Below.</i>		
<input type="checkbox"/> Operator error/experience	<input type="checkbox"/> Non-natural disaster event			
CORRECTIVE ACTIONS & ADDITIONAL INFORMATION.				
<p><i>ATTACH ALL TEST RESULTS AND PHOTOS, AS REQUIRED FOR EVENT REPORTING</i></p> <p><i>For exceedance in the Sewerage System, Test only Faecal coliforms at site & 500m U/S & D/S.</i></p> <p><i>Testing is undertaken during the event and for 2 weeks after the event has ceased, on Monday, Tuesday, Wednesday and Thursday.</i></p>				
AUTHORISATIONS / EPA REPORTING: (Office Use Only)				
Reporting Officer:		Date:		
Position:				
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				
Time:		Event / Log Reference:		
Follow-up:		Due Date:		
<p><i>Protection of the Environment Operations Act 1997.</i></p> <p>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 or CHIEF EXECUTIVE OFFICE UPPER LACHLAN SHIRE COUNCIL PO BOX 42, GUNNING NSW 2581</p>				

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 10 – Emergency Operational Procedure

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 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 EOP 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 or Maintenance.	Primary Incident Controller Overseeing the response to the incident to ensure WHS and POEO related issues are completed..
Health & Safety Leader	Manages WHS 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.

All Incidents require the following equipment

- High visibility protective clothing and footwear
- Protective gloves – rubber to elbow and disposable nitrile
- Ear plugs
- Eye protection
- Face masks
- Reflective vests
- Sun hat and sun screen cream
- 4WD & Mobile Phone/2 way radio
- Spill, Signage & Barriers
- Disinfection equipment e.g. lime.

Additionally, the Sewerage Treatment Plant is to keep:

- Floatation vests
- Safety Boots (NOT Gumboots)
- Gas Monitor
- Spill kit

Additionally, the Sewerage system response truck is to keep:-

- Asbestos kit
- Apron/disposable overalls
- Gumboots

Please Note: - Gumboots are **not** to be used within the Sewerage Treatment Plant near deep water zones without a self-inflating floatation vest as they pose a safety risk to workers. Gumboots may be used away from deep water zones for wash downs, etc.

Procedures.

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

- Locate the incident site;
- Don required PPE;
- Assess the site
 - If required, use gas monitor to test for noxious gasses;
- Isolate the Incident.
 - In the event of a pollution incident, the site must be isolated to prevent unauthorised entry.
 - Isolate the area with barrier boards, parafencing, witches hats, etc. This may be in the form of barrier boards and/or para-webbing 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.
 - Photograph the site
- Notify Manager Water Waste & Sewer (the Incident Controller) & Health & Safety Leader.
- Advise the Manager Water Waste and Sewer if Emergency Services are required.
- 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 e.g. clear the blockage
 - Initiate testing procedures
 - Prevent escalation of the incident.
- Advise downstream landholders as per Appendix 2 (list located at site).
- Advise EPA on 13 15 55
 - Record the Incident Number the EPA provides
- If livestock are likely to consume contaminated water, notify additional landholders where stock are involved.
- Notify Queanbeyan EPA Office and ask if they have any special requirements.
- Place warning signage.
- Initiate testing approximately 500m upstream, at the site, and approximately 500m downstream or just before another watercourse joins the affected watercourse.
 - Test required is faecal coliforms.
 - Samples are to be taken from a safe place.
 - Testing continues for 2 weeks post-event.
 - If the incident occurs on a weekend, samples can be stored in the STP sample fridge for 24 hours, but same day transport is preferred.
- Follow sewer safety procedures for PPE in relation to cleaning and disposal.
- Record all steps taken in the Incident Log.
- Prepare Release Exceedance Notice and return to the EPA within 48 hours.
- Initiate contaminated site clean-up.
- 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 bypassing 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. Use 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 an approved site. If the polluted material is of a toxic nature (e.g. chemical) then disposal will require the engagement of specialist service providers.

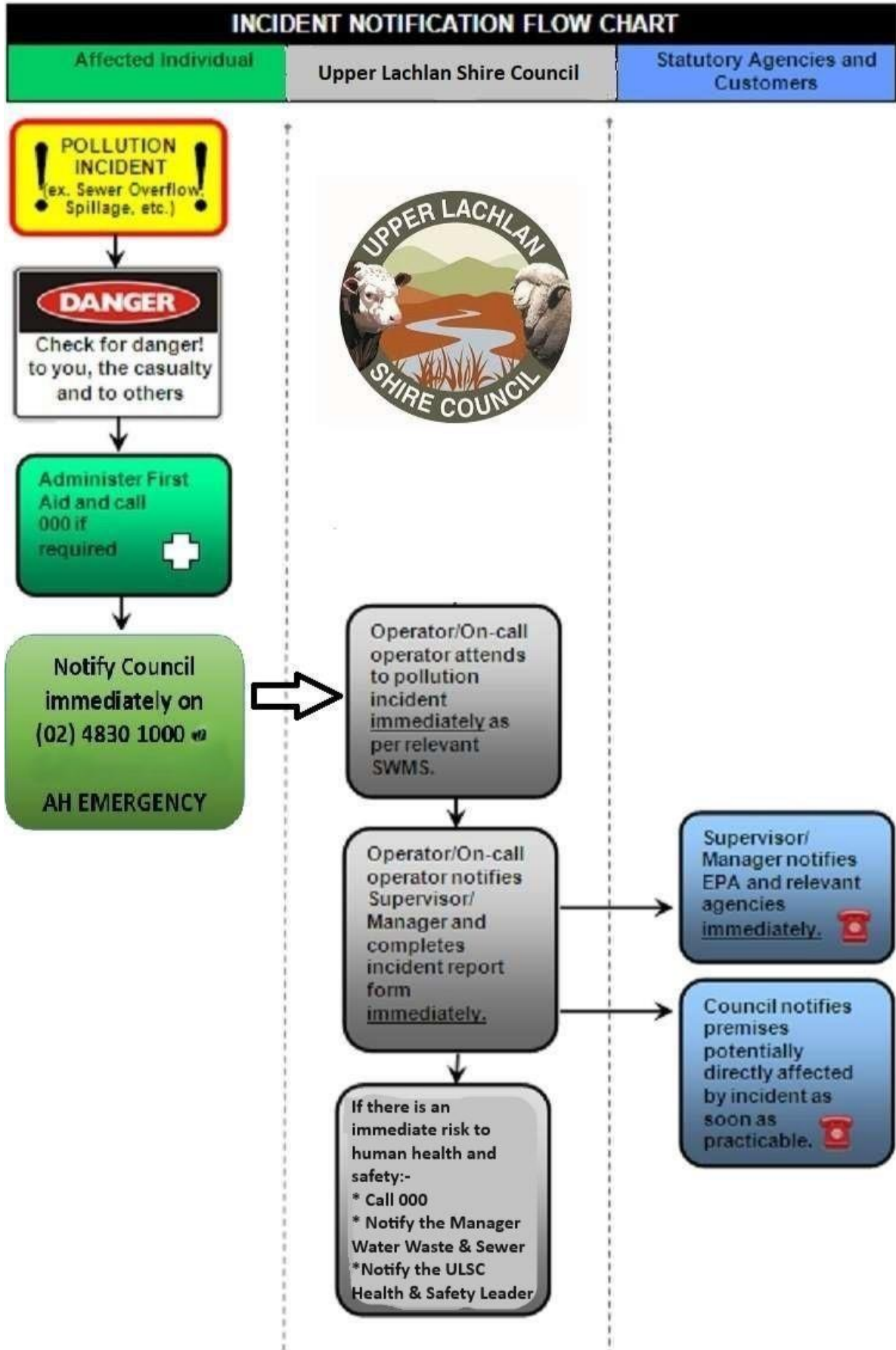
Records.

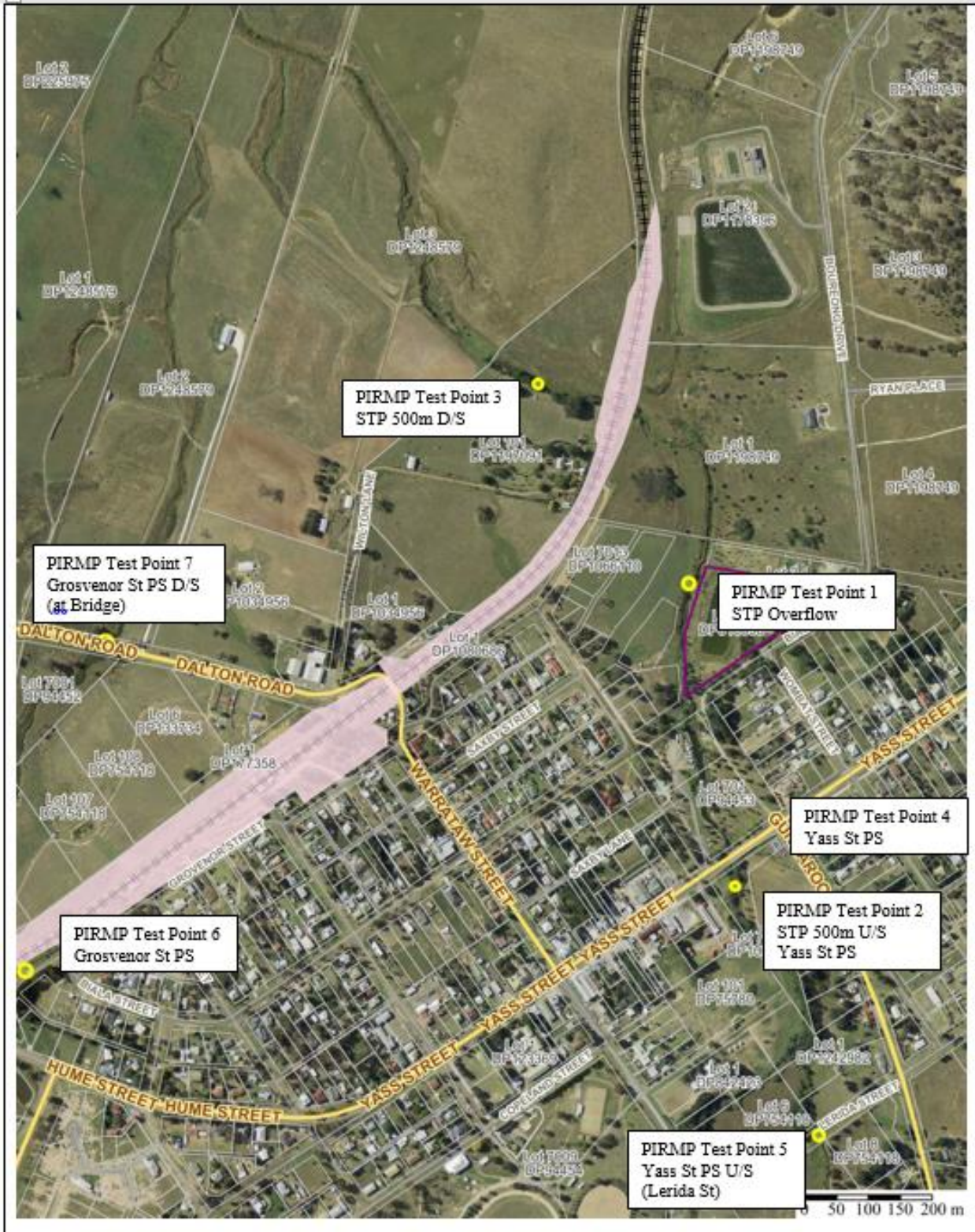
Timeline of Events:



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 that 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 9 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.





 <p>Upper Lachlan Shire Council PO Box 42 Gunning NSW 2581 Telephone: 02 4838 1881 Email: info@ulsc.nsw.gov.au</p>	<p>Important Notice! This map is not to be used for development, construction or other purposes. It is provided for information only. The Council is not responsible for any loss or damage arising from the use of this map. It is provided as a service to the community and is not intended to be used as a legal document. It is provided as a service to the community and is not intended to be used as a legal document.</p>		<p>Drawn By: S.M. 10/04 Project No: 2020/01, 2020/02 Date: 10/04/2020</p>	<p>PIRMP Test Points Use only the test point which relate to the spill site At the site US where available D/S at all times Tests to be done for 14 days post event Map Scale: 1:7976 at A4</p>
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References.

File Number	Description (File)	Status	Location
SWMS/SWI	Emergency Procedures	Pending	To be Re-Developed