Pollution Incident Response Management Plan
Merimbula Sewage Treatment Plant
Princes Highway, Merimbula
Issue 8
26th August 2019
<table>
<thead>
<tr>
<th>Date</th>
<th>Reason for Amendment</th>
<th>Section No.</th>
<th>Page No.</th>
<th>Approved By</th>
</tr>
</thead>
<tbody>
<tr>
<td>21/05/15</td>
<td>Update to reflect current EPA plan requirements</td>
<td>All</td>
<td>All</td>
<td>Bruce Powell</td>
</tr>
<tr>
<td>03/06/15</td>
<td>Insert Record Amendment Sheet</td>
<td>1</td>
<td>2</td>
<td>Bruce Powell</td>
</tr>
<tr>
<td>03/06/15</td>
<td>Update contact numbers</td>
<td>5</td>
<td>22</td>
<td>Bruce Powell</td>
</tr>
<tr>
<td>17/06/16</td>
<td>Update agency contact numbers and response workflow</td>
<td>5, 6 &amp; 9</td>
<td>21-27</td>
<td>Bruce Powell</td>
</tr>
<tr>
<td>23/06/17</td>
<td>Review requested, with respect to inventory of pollutants, onsite equipment, agency contact numbers and response workflow.</td>
<td>3, 5, 6 &amp; 9</td>
<td>17-20, 21, &amp; 21-27</td>
<td>Bruce Powell</td>
</tr>
<tr>
<td>04/06/18</td>
<td>Update agency contact numbers and response workflow</td>
<td>5, 6 &amp; 9</td>
<td>21-27</td>
<td>Bruce Powell, Wouter van der Merwe, Myfanwy Appleton, Keith Hyatt, Jason Darcy, Naomi Maher</td>
</tr>
<tr>
<td>26/08/19</td>
<td>Reviewed</td>
<td>All</td>
<td>All</td>
<td>Bruce Powell, Wouter van der Merwe, Myfanwy Appleton</td>
</tr>
</tbody>
</table>
Contents

1. DESCRIPTION AND LIKELIHOOD OF HAZARDS
2. PRE-EMPTIVE ACTIONS TO BE TAKEN
3. INVENTORY OF POLLUTANTS
4. SAFETY EQUIPMENT
5. CONTACT DETAILS
6. COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY
7. MINIMISING HARM TO PERSONS ON THE PREMISES
8. MAPS
9. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT
10. STAFF TRAINING
11. AVAILABILITY OF PLANS
12. TESTING OF PLANS
13. IMPLEMENTING PLANS
### Table 1.1: Risk Analysis Matrix

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Consequences</th>
<th>Insignificant</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
<th>Catastrophic</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Image / Reputation</strong></td>
<td>Slight impact</td>
<td>Limited impact</td>
<td>Local area impact</td>
<td>State wide impact</td>
<td>National Impact</td>
<td></td>
</tr>
<tr>
<td>Slight effect</td>
<td>Minor on-site contamination</td>
<td>Major on-site contamination with potential for off-site contamination</td>
<td>Minor off-site contamination</td>
<td>Major off-site contamination</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Environment</strong></td>
<td>Slight Damage (&lt; $2K)</td>
<td>Component level replacement/repair ($2K - $8K)</td>
<td>Equipment level replacement/repair ($8K - $12K)</td>
<td>Multiple equipment replacements ($12K - $20K)</td>
<td>Massive widespread equipment damage ($20K +)</td>
<td></td>
</tr>
<tr>
<td><strong>Plant / Equipment</strong></td>
<td>First Aid Injury</td>
<td>Medical Treatment Injury</td>
<td>Lost Time Injury</td>
<td>Fatality</td>
<td>Multiple Fatalities</td>
<td></td>
</tr>
</tbody>
</table>

#### Level of Risk

- **E Extreme Risk** – Do not undertake Operation – re-evaluate proposed work methods
- **H High Risk** – Significant risk control measures to be implemented before works commence
- **M Moderate Risk** – Corrective action other than administrative controls may be needed
- **L Low Risk** – Managed by routine Procedures and Work Practices
<table>
<thead>
<tr>
<th>Activity</th>
<th>Aspect</th>
<th>Impact</th>
<th>Risk Rating /Score</th>
<th>Environmental Control Measure</th>
<th>Residual Risk/ Score</th>
<th>Monitoring</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation</td>
<td>Odours generated from STP at inlet works</td>
<td>Customer complaints</td>
<td>High 11</td>
<td>Routine monitoring and testing, daily inspection, SCADA system, paged alarms. Odour control devices installed as required.</td>
<td>Low 4</td>
<td>Daily inspection of inlet works operation and SCADA control</td>
<td>Notification of compliant to Treatment Works Coordinator. Review control methods. Discuss at weekly meeting.</td>
</tr>
<tr>
<td>Operations</td>
<td>Spillages of petrol, oils and other contaminants</td>
<td>Contamination of soils, groundwater and waterways. Contamination of biological process causing out of spec effluent being discharged to environment</td>
<td>M / 7</td>
<td>Compliance with Environmental Protection Act 1994 Chemicals stored in bunded containers and separated as per the Dangerous Goods requirements. Spill kits available at storage location and site of use. Plant and equipment to be well maintained and serviced to prevent oil leaks on site. Amounts greater than 40 litres of unleaded petrol not to be placed in storage together. SOP’s in place for handling of bulk chemicals, Emergency response, Spill Clean-up and training in these SOP’s to be provided.</td>
<td>L / 3</td>
<td>Informally daily monitoring Scheduled Safety inspections with BVSC WHS officer</td>
<td>Notification to Treatment Works Coordinator. of storage issues / spills. Review of control methods and discuss at weekly meeting.</td>
</tr>
<tr>
<td>Handling of Chemicals/ Storage of Dangerous Goods</td>
<td>Chemical spills</td>
<td>Contamination of soil, water quality, groundwater and surface water. Contamination of biological process causing out of spec effluent being discharged to environment</td>
<td>H / 13</td>
<td>Bund all chemical storage areas as per the Australian Standards. Spill kits available at storage location and point of use. Maintenance of the chemical dosing facility SOP in place for handling of bulk chemicals, Emergency response, Spill Clean-up and training in these SOP’s to be provided.</td>
<td>L / 5</td>
<td>Daily monitoring using SCADA systems Appropriate PPE as per MSDS worn and in good condition. Test Safety shower and eye wash weekly for operation and</td>
<td>Notification to Treatment Works Coordinator of storage issues / spills. Annual review of procedures, control methods and infrastructure.</td>
</tr>
<tr>
<td>Activity</td>
<td>Aspect</td>
<td>Impact</td>
<td>Risk Rating /Score</td>
<td>Environmental Control Measure</td>
<td>Residual Risk / Score</td>
<td>Monitoring</td>
<td>Action</td>
</tr>
<tr>
<td>-------------</td>
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<td>------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Operation</td>
<td>General waste</td>
<td>Deplete natural resources and creates excessive waste that needs appropriate disposal.</td>
<td>M / 7</td>
<td>Used Chemical Kits are returned to supplier for disposal and possible re-use.</td>
<td>L / 2</td>
<td>Regular review of waste tracking log sheets.</td>
<td>Notification to Treatment Works Coordinator</td>
</tr>
<tr>
<td></td>
<td>Grit and screening disposal</td>
<td>Attracts rodents to site – resulting in damage to electrical works</td>
<td>H / 11</td>
<td>Baiting process in place to control rodents that may be attracted to the site.</td>
<td>M / 7</td>
<td>Daily inspection of grit and screening facility to ensure area is clean and change bins at Narrung St as necessary.</td>
<td>Reported to the Treatment Works Coordinator</td>
</tr>
<tr>
<td></td>
<td>Grit disposal Eden, Merimbula &amp; Tura</td>
<td>No grit removal at inlet works resulting in reduced process capacity</td>
<td>High 11</td>
<td>R&amp;R works programs developed and delivered to clean out tanks in non-tourist times of the year</td>
<td>Low 3</td>
<td>Daily inspection of plant</td>
<td>Reported to the Treatment Works Coordinator</td>
</tr>
<tr>
<td></td>
<td>Fire: Fire originating on-site</td>
<td>Death, complete destruction of assets, emissions to atmosphere, contamination of surface water (due to</td>
<td>H / 13</td>
<td>Dispose of rubbish to licensed tips and do not burn rubbish on-site. Hot work FPP to be adhered to at all times and permits to be</td>
<td>M / 9</td>
<td>Smoke alarms and fire fighting equipment is tested</td>
<td>Review of work practices</td>
</tr>
<tr>
<td>Activity</td>
<td>Aspect</td>
<td>Impact</td>
<td>Risk Rating /Score</td>
<td>Environmental Control Measure</td>
<td>Residual Risk / Score</td>
<td>Monitoring</td>
<td>Action</td>
</tr>
<tr>
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<td>--------</td>
</tr>
<tr>
<td>Operation</td>
<td>Sludge management / Transfer of Bio Solids from Sludge Lagoons to Drying Beds at Bega / Bermagui / Tura / Tathra / Merimbula / Eden</td>
<td>Odour complaints from the public; Locate onsite contamination, unsightly.</td>
<td>M / 14</td>
<td>Note wind direction and strength (approx) when transferring to beds. Clean-up hard stands as soon as the contractor has finished loading truck to reduce odour and unsightly mess.</td>
<td>L / 5</td>
<td>Inspection of biosolids unloading area daily and clean as necessary, inspection. Complaints to be reported to Treatment Works Coordinator. Digestor Operation to be reviewed quarterly.</td>
<td></td>
</tr>
<tr>
<td>Operation</td>
<td>Bega / Eden / Tura / Merimbula - Harmful influent/ out of spec effluent</td>
<td>Contamination of biological process causing out of spec effluent being discharged to environment</td>
<td>H / 13</td>
<td>Emergency response plans are in place and need to be updated / reviewed annually.</td>
<td>L / 4</td>
<td>Daily monitoring of SCADA trends and on site Laboratory testing as per SOP Detection to be reported to Treatment Works Coordinator. Plant Manager to Inform Operations Manager-South</td>
<td></td>
</tr>
<tr>
<td>Operation</td>
<td>Bega / Merimbula / Eden Decant motor / gearbox / cable breaks resulting in solids carry over</td>
<td>Contamination of biological process causing out of spec effluent being discharged to environment</td>
<td>High 11</td>
<td>Critical spares kept on site – spare gearbox / motor and worm gear at Bega, replacement cables kept on site at Merimbula and Eden.</td>
<td>Moderate 7</td>
<td>Daily inspection of cables Detection to be reported to Treatment Works Coordinator r. Treatment Works Coordinator to inform Operations Manager-South</td>
<td></td>
</tr>
<tr>
<td>Operation</td>
<td>Blower failures - high ammonia</td>
<td>Contamination of biological process causing out of spec effluent being discharged to environment</td>
<td>High 14</td>
<td>Spare blowers kept at Bega for the MBR plants, 3 monthly inspections carried out by PM service provider.</td>
<td>Moderate 9</td>
<td>Daily inspection of plant, daily monitoring of SCADA trends and regular preventative maintenance activities Detection to be reported Treatment Works Coordinator. Treatment Works Coordinator to inform Operations Manager-South</td>
<td></td>
</tr>
<tr>
<td>Activity</td>
<td>Aspect</td>
<td>Impact</td>
<td>Risk Rating /Score</td>
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<td>Residual Risk/ Score</td>
<td>Monitoring</td>
<td>Action</td>
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<tr>
<td>----------</td>
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<td>-------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Operation| Chemical Substances         | Fume inhalation, skin or eye contact, spills | M / 7              | Storage in bunded containers on site.  
Up to date MSDS on site and MSDS Register maintained.  
Storage and use in accordance with MSDS specifications.  
PPE is used when handling chemicals.  
Personnel trained in Chemical Handling techniques.                                                                                     | L / 5                | Daily inspection of bunded areas.  
Review of controls and SOP.                                                                                                                | Notify issues to Treatment Works Coordinator.  
Re-training.                                                                                                                                   |
| Operation| Noise                       | Hearing damage                  | M / 7              | Hearing protection to be worn if occupying the following areas for more than 4 hours; near blowers and on SBR Basins at Narrung St  
Hearing protection to be worn on access platform on filter gallery and in the dewatering shed at all times at both Narrung St and Kooringal.  
Quietest equipment practicable selected for works.  
Maintenance of equipment to reduce noise generated through wear and tear.  
Hearing protection to be provided at all times and SWMS for hand tools to include hearing protection.                                                                 | L / 5                | Ongoing monitoring (during site walks etc)  
Biannual noise surveys to be conducted.                                                                                                       | Notify issues to Treatment Works Coordinator.  
Retraining.                                                                                                                                      |
| Operation| Biological (bacteria, viruses, | Deterioration in health, injury / fatality | H / 13             | Adequate washroom and lunchroom facilities will be provided.  
High risk personnel are recommended for relevant medical injections and training.  
First aid box and suitably qualified/competent first aid nominee to be on site during working hours.  
Emergency response procedures as per the site induction.  
Personal Protective Equipment to be provided and used where contamination present High risk areas for contact with a biological hazard are identified in site induction and any new areas identified in daily pre-start.  
SOP’s developed for works being conducted around these areas with                                                                 | L / 5                | Ongoing monitoring (during site walks etc)  
Annual review of induction.                                                                                                                  | Notify issues to Treatment Works Coordinator.  
Review control methods and retraining                                                                                                            |
<table>
<thead>
<tr>
<th>Activity</th>
<th>Aspect</th>
<th>Impact</th>
<th>Risk Rating /Score</th>
<th>Environmental Control Measure</th>
<th>Residual Risk/ Score</th>
<th>Monitoring</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation</td>
<td>Dust</td>
<td>Inhalation – Respiratory irritation</td>
<td>M / 7</td>
<td>If material is dry and dust is being generated water will be sprayed onto to minimise. Activities to be restricted if dust is unable to be suppressed.</td>
<td>L / 5</td>
<td>Ongoing monitoring (during site walks etc)</td>
<td>Notify issues to Treatment Works Coordinator. Review control methods and retraining</td>
</tr>
<tr>
<td>Outdoors</td>
<td>Non-Potable water taps.</td>
<td>Biological hazard, deterioration of health.</td>
<td>H / 13</td>
<td>All non-potable taps on site are to have signage installed and pipe work to the taps to be painted lilac. Site induction to reiterate the hazard of drinking this water.</td>
<td>L / 3</td>
<td>Regular inspections of sites to maintain signage.</td>
<td>Replace as required</td>
</tr>
</tbody>
</table>
### SECTION 3 – INVENTORY OF POLLUTANTS

<table>
<thead>
<tr>
<th>Product</th>
<th>Maximum Onsite Quantity</th>
<th>SDS Issue date</th>
<th>Class</th>
<th>Location on site, Storage area</th>
</tr>
</thead>
<tbody>
<tr>
<td>114559 – Ammonium Cell Test Method 4-80mg/l</td>
<td>19/06/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114558 – Ammonium Cell test Method 0.20-8mg/l</td>
<td>15/06/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114752 – Ammonium test 0.010-3mg/l</td>
<td>08/11/2017</td>
<td>8</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114540 – COD Cell Test Method 10-150mg/l</td>
<td>29/11/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114541 – COD Cell test method 25-1500mg/l</td>
<td>29/11/2017</td>
<td>9</td>
<td></td>
<td>All site/Lab</td>
</tr>
<tr>
<td>114542 – Nitrate Cell test Method 0.5-18mg/l</td>
<td>20/01/2014</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114773 – Nitrate test 0.20-20mg/l</td>
<td>20/01/2014</td>
<td>8</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114543 – Phosphate Cell Test Method .05-5mg/l</td>
<td>11/04/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114848 – Phosphate test Method DPD 0.010-6</td>
<td>31/08/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114547 – Nitrite Cell test Method 0.03 -2.30</td>
<td>22/06/2017</td>
<td></td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>100595 - Chlorine Cell test (free chlorine) Method DPD 0.03 - 6</td>
<td>20/01/2014</td>
<td></td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>100599 – Chlorine test (free and total Chlorine)</td>
<td>20/06/2017</td>
<td></td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114729 – Phosphate Cell test method 0.5-25mg/l</td>
<td>11/04/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>114537 – Nitrogen Cell test Method 0.5-15mg/l</td>
<td>11/04/2017</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>109475 – Buffer Solution - red</td>
<td>14/07/2017</td>
<td></td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>109477 – Buffer Solution – Green</td>
<td>19/12/2017</td>
<td></td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>101758 – Acid Capacity cell test 0.03 – 2.30mg/l</td>
<td>20/01/2014</td>
<td>9</td>
<td></td>
<td>All sites/Lab</td>
</tr>
<tr>
<td>Alum Sulfate Solution</td>
<td>15000L</td>
<td>18/04/2017</td>
<td></td>
<td>Bega/Tathra Shed</td>
</tr>
<tr>
<td>Caustic Soda – Liquid 5%-45%</td>
<td>15000L</td>
<td>09/06/2015</td>
<td>8</td>
<td>Bega/Tathra/Storage shed</td>
</tr>
<tr>
<td>No.</td>
<td>Description</td>
<td>Quantity/Units</td>
<td>Expiry Date</td>
<td>Corrosive</td>
</tr>
<tr>
<td>-----</td>
<td>---------------------------------------</td>
<td>----------------</td>
<td>-------------</td>
<td>-----------</td>
</tr>
<tr>
<td>20</td>
<td>Alphos</td>
<td>15000L</td>
<td>01/09/2017</td>
<td>8</td>
</tr>
<tr>
<td>21</td>
<td>Hypo – Liquid Pool Chlorine</td>
<td>2000L</td>
<td>14/03/2016</td>
<td>8</td>
</tr>
<tr>
<td>22</td>
<td>GOJO Antibacterial Foam Soap</td>
<td>1L</td>
<td>15/06/2016</td>
<td>3</td>
</tr>
<tr>
<td>23</td>
<td>Citric Acid</td>
<td>12x35kg bags</td>
<td>18/11/2014</td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Unleaded Fuel</td>
<td>10L/20L</td>
<td>06/05/2014</td>
<td>3</td>
</tr>
<tr>
<td>25</td>
<td>Diesel</td>
<td>150L</td>
<td>01/12/2015</td>
<td>9</td>
</tr>
<tr>
<td>26</td>
<td>Hydrated lime</td>
<td>30x25kg bags</td>
<td>01/02/2017</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Chlorine gas</td>
<td>280kg</td>
<td></td>
<td>2.3 toxic gas</td>
</tr>
<tr>
<td>28</td>
<td>Hypo – Liquid Pool Chlorine</td>
<td>9000L</td>
<td>14/03/2016</td>
<td>8</td>
</tr>
<tr>
<td>29</td>
<td>Hypo – Liquid Pool Chlorine</td>
<td>2000L</td>
<td>14/03/2016</td>
<td>8</td>
</tr>
<tr>
<td>30</td>
<td>Hypo – Liquid Pool Chlorine</td>
<td>10000L</td>
<td>14/3/2016</td>
<td>8</td>
</tr>
</tbody>
</table>
## SECTION 4 – SAFETY EQUIPMENT

<table>
<thead>
<tr>
<th>Item</th>
<th>Number</th>
<th>Location at Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrocarbon Spill Kits</td>
<td>1</td>
<td>Admin Office</td>
</tr>
<tr>
<td>Chemical Goggles, Gloves</td>
<td>1 pair/ 1 each</td>
<td>STP laboratory</td>
</tr>
<tr>
<td>Hard Hats, Vests, S/Glasses</td>
<td>&gt; 3 of each</td>
<td>Admin Office</td>
</tr>
<tr>
<td>First Aid Kits</td>
<td>1 + 1</td>
<td>Admin Office + Operator’s vehicle</td>
</tr>
<tr>
<td>Safety Eyewash</td>
<td>1</td>
<td>Chemical Dosing Area</td>
</tr>
<tr>
<td>Material Safety Data Sheets</td>
<td>1 binder</td>
<td>Admin Office</td>
</tr>
<tr>
<td>Fire Extinguishers</td>
<td>1 of each type</td>
<td>Admin Office (wet) &amp; Switch Room (dry)</td>
</tr>
</tbody>
</table>
SECTIONS 5, 6 & 9

- Contact Details
- Communicating with Neighbours and the Local Community
- Actions to be Taken During or Immediately After an Event

**SEWERAGE SYSTEMS**

**STEPS**

| Report of unlicensed sewage discharge | 1. Advise W&SS operator immediately | 2. Note time of notification, name and contact details of notifying person, location and nature of discharge | 3. Attend site and assess situation |

<table>
<thead>
<tr>
<th>Report may be received via:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- BVSC staff member</td>
</tr>
<tr>
<td>- Regulator (eg EPA)</td>
</tr>
<tr>
<td>- Member of public, via BVSC Customer Services or Well Done International (WDI)</td>
</tr>
</tbody>
</table>

**NOTES/RISKS**

- Refer to BVSC On-Call Duty Roster and advise W&SS Area On-Call operator by mobile phone.
  
  *(Person to person voice contact must be made – do not leave voice messages).*

Create Customer Request Management (CRM) for W&SS admin officer, with sub tasks for -

- i) Environmental Health, Building and Regulatory Services (EHB&RS) Manager, and
- ii) Responsible W&SS area team. W&SS field staff are to also note event details in personal diary, including CRM number when this is provided.

**W&SS Operator(s)**

***High priority to be given to achieving minimum response time***

Assess event - Where sewage overflows are of significant volume (i.e. >100L), or may remain uncontained, or have discharged to or adjacent to a body of water, the event is to be considered Significant.

>>> For all other events >>> move to step 8 >>>

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Owner: Bega Valley Shire Council       Page 13 of 23       Revision: 8, 10/06/2019
4. Advise BVSC Environmental Health Officer & W&SS Operations Supervisor & Manager

For Significant Events -

- Refer to on-call roster for Environmental Health Officer (EHO) and seek attendance.  

**Note - EHO notification and subsequent EHO response to the discharge must take place as a priority.**

- Notify Council’s Customer Care Officer immediately if the sewage discharge has affected the inside of a customer’s premises.

5. If discharge has potential to affect waterways, oyster beds or public contact areas or if volume discharged is significant. Notify external authorities immediately if discharge is affecting waterways/ oyster beds or has the potential to do so.

**Contact**

- EPA Pollution Line 131 555, then Option 1
- NSW Food Authority 1300 552 406, then Option 1 (Business Hours)
- NSW Food Authority - Shellfish Team Manager 0407 078 269 (After Hours)
- Safe Work NSW 131 050, then Option 2
- Fire & Rescue NSW 0414 379 117

And - where a waterway is potentially affected, contact -

- NSW Fisheries 02 6496 8200 (Business Hours, then leave a message if after hours).

And - where the discharge has the potential to affect public health, contact –

- Dept. of Health 1300 066 055 (24hrs). Will divert to nearest office or AH officer.

And - where shellfish beds may be also be affected, contact the local Shellfish Program Coordinator, as follows -

- Merimbula Lake – 0487 240 260 or 0477 585 245
- Pambula River – 6495 6704 or 0419 211 818
- Bermagui River –
- Twofold Bay – 6496 1116 or 0428 961 116
6. Notify Director, Assets and Operations
   Notify Director, Assets and Operations on 0418 227 558 if discharge is significant in terms of public health, environmental health, media interest or if the discharge has resulted in or likely to result in a beach or waterway closures.
   Director, Assets and Operations to notify General Manager and Councillors if required.
   O&A Director

7. Arrange Water Quality Samples if required
   Liaise direct with external authorities and agree on sampling program.
   BVSC Environmental Health Officer

8. Isolate public from contamination
   Use safety fencing and erect signage if required.
   Signage type, number and location to be agreed in consultation with EHO. Consider all likely points of site access for recreational and commercial site users.
   W&SS Operator and Environmental Health Officer

9. Contain discharge if possible
   Turn off any contributing upstream pump stations and monitor wet well levels. Use straw bales or other sediment arresting materials to contain spill.
   W&SS Operator

10. Deploy staff & equipment to rectify problem
    Call in mobile pumps/ Gensets and Vacuum Trucks as required
    - Cleanaway – 0429 921 664 / 6492 1664
    - Sapphire Waste Services – 0438 924 408
    - Essential Energy - 132 080, then option 5.
    W&SS Operator
    Deploy suitable traffic control, if roadway affected.
    Call in Tech Services electrical or mechanical technicians if any Sewerage pumping station fault cannot be rectified.
    Notify W&SS Treatment Operations Team if a sewer choke or high flow situation could be possible at the appropriate STP due to this problem.
    - On-Call STP operator – 0437 947 116, or where no direct voice contact,
    - Treatment Operations Supervisor – 0458 095 853
    - Treatment Operations Supt – 0427 418 911
11. Clear mains blockages if applicable
   Use jetting trailer as required. Sewer rods may only be used for lengths less than 8m. Adhere to safe work method statements and associated hygiene practices.
   W&SS Operator

12. Retrieve solids on site.
   Place all solids and contaminated clean up materials BVSC 200 micron (thick blue) plastic bags for disposal at BVSC landfill site.
   W&SS Operator

13. Disinfect site including gutters and downstream areas.
   Disinfect site including gutters and downstream areas. Where event declared significant, consult Environmental Health Officer for appropriate methods and extent of required disinfection.
   W&SS Operator/Environmental Health Officer

14. Determine extent of environmental impact/pollution
   Check for extent of contamination travel in drains and gutters.
   Double check for discharge to waterways.
   Environmental Health Officer

15. Final inspection
   Check all public health issues have been considered.
   Environmental Health Officer

16. Document incident
   Complete EHO action form template electronically and attach to CRM sub-task within 72 hrs. Forward CRM sub task to EHB&RS manager for review and closure.
   Complete FastField Sewer Choke form, within 72 hrs, and close CRM sub task if raised.
   Environmental Health Officer
   W&SS Operator

   Upon receipt of EHO, re-assign CRM to W&SS Operations Superintendent for review - and the issuing of an R3.3 report to the EPA where it is expected this will be required, or where it has been requested by the EPA.
   W&SS Admin

   Review of CRM and close out as described below.
   W&SS Operations Supt

17. Draft and issue EPA incident report if required and or requested.
   W&SS Operations Supt

   Reference details described within “Unlicensed Sewage Discharge Report” form.
Email details of incident to DOH where requested.

Report template located at Q:\ENG\Water and Sewerage Services\W&SS Operations\3. Safety & Emergency\3.12 Incident Reports\Unlicensed Sewage Discharge Events\Report Templates

Send a copy of incident report to EPA Queanbeyan (queanbeyan@epa.nsw.gov.au)

Send a copy of incident report to NSW Food Authority (contact@foodauthority.nsw.gov.au) and DOH (james.allwood@health.nsw.gov.au and peter.harrington@health.nsw.gov.au) on the next working day, where requested.

Environmental Health Officer
SEWAGE TREATMENT PLANT

If Incident occurs at an STP

Incidents where effluent is, or is likely to be discharged which may - or have potential to - cause material harm to the environment.

POEO Reporting Obligations are described within the following link:


Advise the NSW Office of the Environment & Heritage’s Pollution Line.
(obsigations described under POEO Act 1997).

Report the event to STP Licensor -

NSW EPA Pollution Line
- 131 555

Record EPA Event Number on event log and quote on report correspondence.

Advise W&SS Treatment Operations Management.

Notify W&SS Operations Supervisor 0458 095 853 or where unavailable, Treatment Operations Supt 0427 418 911. On Call Officer available on 0437 947 116

Commence Site Incident Log of all events, for preparation of the Incident Notification and preparation of R3.3 report where required.

Commence Site Incident Log

STP Operator/
STP Operations
Supervisor/
Operations Supt

STP Plant
Operations Staff

Treatment Plant
Operator
r/ Plant
Supervisor

W&SS
Operations
Manager / BVSC Duty
Officer / BVSC EHO.
Create a CRM with details of the event. Forward to actioned EHO for the addition of comments, before its return to the Treatment Supt for completion.

Treatment Supt to complete CRM and details for possible R3.3 report to EPA where required.

Treatment Adminstration
n/ Supervisor
EHO

Treatment Supt.
7. **MINIMISING HARM TO PERSONS ON THE PREMISES**

- Operators of BVSC Sewage Treatment Facilities are to initiate the attendance of Combat agencies in the first instance, to minimise risk to themselves or those in their care at the plant at the time of any incident.

- Operators are to ensure lone worker protocols are followed when working alone or attending or after hours on-call events.

- Only inducted, trained, experienced, competent staff may operate this plant.

- Operators are to ensure safety eyewash facilities at chemical storages have been checked for correct operation at the commencement of chlorine cylinder change, and otherwise, weekly.
8, 9  **MAP – MERIMBULA SEWAGE TREATMENT PLANT**

Owner: Bega Valley Shire Council  
Page 21 of 23  
Revision: 8, 10/06/2019  
UNCONTROLLED WHEN PRINTED
10. TRAINING REQUIREMENTS

10.1 PIRMP procedures

• Training in this procedure is to be undertaken at time of induction for all new employees, and for all existing employees, every 12 months.

• Contract staff and sub-contractors will be introduced to the requirements of the POEO Act with respect to reporting events that have the potential to cause material harm to the environment.

• Records of training in this and subsequent versions of this procedure will reside on the corporate training database.

• Testing of this procedure will occur annually.

10.2 Operator Competence

• All operators of BVSC Treatment Plants undertake Water Industry Operations / Water Industry Treatment Certificate III training, and additional competence and safety training as required.

11. AVAILABILITY OF PLANS

• A copy of this plan is maintained at the licensee’s premises. It is readily available to those responsible for its implementation and to an authorised officer on request.

• Required sections of the plan are publicly available within 14 days of each review and are available on the Bega Valley Shire Council website. The plan includes procedures for contacting the relevant authorities including the EPA,
12. **TESTING OF PLANS**

- This plan shall be tested routinely once every 12 months, where incident frequency does not require use of the plan within a shorter time period.
- This plan will be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates to assess, in the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

13. **IMPLEMENTING PLANS**

- All operations staff responsible for the operations and maintenance of Sewer assets within the catchment area prescribed by the Environmental Protection licence to which this PIRMP pertains, are reminded of their responsibilities under the POEO Act, as follows –

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

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