

Pollution Incident Response Management Plan Volume 1 - Public Advice

Sewerage Services

Updated June 2020



NARRABRI SHIRE
DISCOVER THE POTENTIAL

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

VOLUME 1 – PUBLIC ADVICE

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Revisions

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Circulation¹

Revision	Format	Hardcopy Access Location
Water Services Operators	Hardcopy	SNA.TP01 and Operations Depot
W&S Operations Manager (WOM)	Intranet & Hardcopy	Operations Depot
Water Services Manager (WSM)	Intranet & Hardcopy	NSC Administration
Local Emergency Management Committee (LEMC)	Intranet & Hardcopy	NSC Administration
Customer Service Officers	Intranet	
Community	Internet	
EPA	Internet	
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The initial plan was prepared by *LMB Aqua* for *Narrabri Shire Council (NSC)*. Updates have been provided by *Narrabri Shire Council Water Services Division*

Thanks, is extended to the NSC Water and Sewerage personnel who contributed to this document.

¹ Pursuant to PoEO Act s153D, and PoEO Reg s98D. This includes requirement to circulate updated copies within 14 days of change(s) to this document.

Abbreviations

PIRMP	Pollution Incident Response Plan
NA	Narrabri Township
NSC	Narrabri Shire Council
SNA	Narrabri (township) Sewerage Scheme
	<i>Service Class = S = Sewerage, Community = NA = Narrabri</i>
STP	Sewage Treatment Plant
PDWF	Peak Dry Weather Flow
PWWF	Peak Wet Weather Flow
PoEO Act	Protection of the Environment Operations Act 1997
PoEO Reg	Protection of the Environment Operations (General) Regulation
P-I	Pollution Incident (definition below)
W&S	Water and Sewerage

Key Definitions

Catchment(s)	Tract(s) of land related to sewage and/or stormwater flows upstream and downstream of a particular point in the subject sewerage network.
Hazard(s)	set of substances that may be harmful to people or the environment and could result in a P-I
Material Harm ²	Environmental harm as defined in s147 of the PoEO Act. Material harm is notifiable pursuant to s148 of PoEO Act. Refer Appendix 2 – Key definitions from PoEO Act 1997
Pollution Incident ²	(P-I) As defined in PoEO Act 1997. Refer Appendix 2 – Key definitions from PoEO Act 1997

² The legislative definition is included for convenience in of this PIMRP.

Part A – Overview for Volume 1

Introduction

This document is a concise reference for Council operational staff, contractors and the general community for prevention and response for sewerage-related ***pollution incidents***. Such incidents may be in the form of a sewage spill from a *gravity sewer* or pressure *rising main*, an overflow from a domestic *overflow relief gully* (ORG) or *service-connection inspection opening* (SIO), or potentially a chemical spill at a sewerage facility. Sewage comprises domestic and trade-waste.

Narrabri Shire Council (NSC) is responsible for operation and maintenance of sewerage schemes in the townships of Narrabri, Wee Waa and Boggabri. The environment in which these schemes exist is considered from a ***catchment*** perspective. Despite diligent management, it is recognised sewerage-related ***pollution incidents*** may invariably occur within these catchments.

Relative to statutory requirements, NSC is required to *prepare-for* and *respond-to* such sewerage-related ***pollution incidents***.

NSC is to notify the NSW EPA when such incidents cause or may cause ***material harm***. Preparation and response is addressed relative to the level of ***risk*** attached to individual pollution incidents.

A **PIRMP is mandatory** for the Narrabri township sewerage scheme. A PIRMP is not required NSC's other sewerage schemes, but NSC has voluntarily expanded this PIRMP to include its other schemes for consistency of operation and service for its community.

Focus of this PIRMP

This PIRMP documents NSC's pertinent Operational Protocols for ***pollution incidents*** including:

- the procedure for ***Incident Response***;
- the manner of ***community notification***;
- ***clean-up*** after a ***pollution incident***;
- when and how an ***incident investigation*** will occur;

This applies to the areas of operation below.

PIRMP Area of Operations

This volume of the PIRMP pertains to the following NSC sewerage scheme(s):

1. **SNA** – Narrabri (township);
2. **SBO** – Boggabri; and
3. **SWW** – Wee Waa.

Third-Party Transported Waste IN TRANSIT is Not Included

This PIRMP does not cover the spillage of liquid waste or chemicals from the vehicles of third-party carriers outside NSC sewerage facilities. Such carriers are separately responsible under legislation for safe transport of these substances.

Implementation and Maintenance of This Plan

NSC's Water Services Manager is responsible for the implementation and maintenance of this plan. Such implementation and maintenance is done in accordance with legislation and the relevant guideline.

In accordance with s153F of the PoEOAct, if a ***pollution incident*** occurs in the course of an activity so that ***material harm*** is caused or threatened, the person carrying on the activity must immediately implement this PIRMP.

Legislation

This PIRMP is pursuant to the following NSW legislation:

- PoEO³ Act 1997; and the
- PoEO (General) Regulation 2009.

This PIRMP has been prepared with reference to the PIRMP Guidelines⁴.

Linkages

The processes in Volume 1 are intended to integrate with ***NSW Emergency Management Arrangements***.

At a local level this PIRMP links to NSC's EMPLAN⁵. The EMPLAN may require review to reflect this version of NSC's **PIRMP**, and may also require review when the PIRMP is updated. Council's Local Emergency Management Officers (ref. Appendix 5) will co-ordinate such review.

Training, Testing and Update of the PIRMP

These details are covered in PIRMP Volume 2.

³ PoEO - Protection of the Environment Operations

⁴ From the 2012 Guidelines, the specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation).

In summary, this provision requires the following:

- All holders of environment protection licences **must prepare a PIRMP**⁴ (section 153A, PoEO Act);
- The plan **must include the information** detailed in:
 - the PoEO Act (section 153C); and
 - be in the form required by the PoEO(G) Regulation (clause 98B);
- Licensees **must keep the plan at the premises** to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, PoEO Act);
- Licensees **must test the plan** in accordance with the PoEO(G) Regulation (clause 98E).

⁵ <http://www.narrabri.nsw.gov.au/emergency-risk-management-1120.html>

Part B - Operational Protocols

Contact details

Residents and contractors witnessing a **sewage-related pollution incident** are requested to contact NSC as set out in Appendix 5

Incident Preparedness and Response

Ideally, the aim should be to **prevent** the occurrence of **pollution incidents (P-I)**. NSC’s operational goal is to prevent pollution incidents through effective *asset management and operations and maintenance practices*.

However, **pollution incidents (P-I)** may still occur from time to time and as such it is important to minimise the impact through rapid response. This can be achieved through:

- Public awareness; and
- NSC staff education and training;
- NSC having ready and rapid access to appropriate resources.

Relevant responsibilities and actions are given in Appendix 5

P-I PREPAREDNESS AND RESPONSE

Person	Daily Preparedness	For a <i>Pollution Incident (P-I)</i>
All customers and the general public.	Keep NSC contact numbers handy –Appendix 5 Ensure premises are compliant with plumbing regulations. Refer Appendix 3 for important details about <u>ORGs and the SIO!</u>	<ul style="list-style-type: none"> • <u>Avoid access</u> to the polluted area • <u>Contact a plumber</u> for customer-side faults. • <u>Contact Council</u> via the relevant number in Appendix 5 to alert Council and seek advice if considered to be council-side faults. Be prepared to provide a verbal description.
NSC Call-centre staff	Be trained & familiar with this PIRMP, water industry competencies	<ul style="list-style-type: none"> • Notify on-call staff and log job(s); • Immediately notify the W&S Area supervisor of actual or expected material harm⁶ i.e. non-trivial
NSC on-call sewerage operators (rostered)	Be trained & familiar with this PIRMP, water industry competencies, & operation of the sewerage network. Routinely monitor SCADA for alarms.	<ul style="list-style-type: none"> • Respond via NSC’s dedicated WPG⁷ for sewerage Pollution Incident Response and as otherwise directed by the W&S Area Supervisor; • immediately notify the W&S Area Supervisor of actual or expected material harm⁸ i.e. non-trivial; • secure the site as necessary, and arrange to isolate pumps / equipment that may contribute to the P-I
NSC W&S Area Supervisor	Training etc. as per on-call operators. Ensure SCADA and auto-dialler is routinely	<ul style="list-style-type: none"> • Immediately notify the W&S Operations Manager of actual or expected material harm⁸ i.e. non-trivial;

⁶ HEALTH/SAFETY NOTE: if it is evident there is actual or imminent threat to human health or safety, immediately contact the WOM and/or WSM who may initiate NSC’s EMPLAN response via LEMOs.

⁷ NSC Work Process Guideline (a standard operating procedure within NSC’s Integrated Management System)

⁸ HEALTH/SAFETY NOTE: if it is evident there is actual or imminent threat to human health or safety, immediately contact the WOM and/or WSM who may initiate NSC’s EMPLAN response via LEMOs.

Person	Daily Preparedness	For a <i>Pollution Incident (P-I)</i>
	tested and serviced – refer WPG. Ensure resources such vacuum trucks, portable pumps, and clean-up kits are ready for rapid response.	<ul style="list-style-type: none"> ensure on-call operator has completed the above tasks & ensure extra assistance is provided as necessary <i>and as otherwise directed by the W&S Operations Manager</i>; inspect the site and communicate with effected persons as directed by the Water Services Manager; Complete NSC standard OHS <i>INCIDENT FORM</i> I10/18071
W&S Operations Manager (WOM)	Ensure on-call staff and contractors are trained and have ready access to all relevant serviced equipment on trucks including all PPE.	<ul style="list-style-type: none"> Immediately notify the Water Services Manager; contact emergency services as per Appendix 5; <i>co-ordinate</i> landholder-contact as per this PIRMP; complete Appendix 1 – NSC Pollution Incident Form within 24h after the <i>P-I</i> is over, and other information as directed by the Water Services Manager.
Water Services Manager (WSM)	Ensure this PIRMP is tested as set out in Volume 2, and that staff are trained and prepared for rapid response, and that stakeholders are educated and consulted within reason.	<ul style="list-style-type: none"> ensure the W&S Operations Manager has completed the above tasks, and ensure extra assistance is provided if necessary; for <i>P-I</i>s that cause material harm ensure EPA is contacted <u>immediately</u>⁹ relative to s101 of the PoEO Reg (i.e. telephone contact to number in Appendix 5 as soon as aware, then any significant updates until the <i>P-I</i> is over). Then with 7 days after the incident, provide EPA written report based on Appendix 1 – NSC Pollution Incident Form; ensure contact with all relevant entities in Appendix 4

Note: Only the W&S Operations Manager or Water Services Manager shall communicate with Emergency services.

Community Notification

Impacts due to pollution incidents are variable and depend on location, volumes involved or other factors. As such, communication methods will be used on a case by case basis.

The following methods may be adopted:

- Phone calls
- Media releases (radio/television/newspaper/internet/social media as required)
- Site visits/door knocking
- Letter drops
- Warning signs
- Other methods as the situation requires

In the event of a chemical or sewage spill into stormwater or waterway, NSC staff are to go to prominent and/or high use areas of the affected waterway and erect signage. The signs are to warn water users of the

⁹ PoEO Act s148 requires immediate notification of all relevant information to each relevant authority, and PoEO (General) Regulation s101 details the immediate notification, 7 days for written reporting, and use of EPA Environmental Line

contamination and advise them to avoid activities such as swimming, fishing, shell fish collection and boating until contamination has cleared. If the event occurred or was occurring during dry weather, NSC staff are to attend popular sites and advise users directly.

NSC will attempt to provide early warning to directly affected premises by phone call or site visit. 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)
At that point NSC will remove signs and advise the community using the adopted methods.

Council maintains details of known overflow points for sub-catchments.

Response for Non-Trivial Harm that is a Threat to Human Health or Safety

If there is an actual or imminent threat to human health or safety, immediately contact the WOM and/or WSM who may initiate NSC's EMPLAN response via Local Emergency Management Officers - LEMOs (Appendix 5).

If evacuation is necessary, LEMOs will contact the police, who have authority to evacuate. (Refer EMPLAN).

Clean-up

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

Incident investigation

All **P-Is** that cause **material harm** shall be investigated. For all other incidents, the Water Services Manager (with guidance from review personnel) will decide whether an incident investigation will be conducted.

When an **incident investigation** is required, the Water Services Manager is responsible for:

- Forming the investigation
- Co-ordinating the investigation

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

A de-brief¹⁰ is to be conducted for all such incidents. However, the Water Services Manager may also initiate de-briefs for other incidents where they feel it is appropriate

¹⁰ Emergency events may be emotionally traumatic.

Part C - Appendices

Appendix 1 – NSC Pollution Incident Form

Date and Time of Incident
Location
Pollutants – Description, Quantity, Concentration
Material Harm Caused – Include Costs
Circumstances including cause if known
EPA Verbal Contact – Dates, Times, Personnel, EPA Directions
Emergency Services Contact – Date, Time, Personnel, Emergency Service Response
Action taken or proposed
Other relevant information (include all Community notifications)
Note – for more details, refer NSC standard “INCIDENT FORM” that is completed for all NSC incidents.
Reporting Officer
<div style="display: flex; justify-content: space-between;"> <Printed Name> <Signature> <Date report signed> </div>

Form based on PoEO Act s150 - Note: Attach additional sheets as necessary and number each page.

APPENDIX 2 – KEY DEFINITIONS FROM POEO ACT 1997 ¹⁰

Pollution Incident

pollution incident means

an incident or set of circumstances during (or as a consequence of) which there is (or likely to be) a **leak, spill** (or other escape or deposit) **of a substance** as a result of which **pollution** has **occurred**, or is **occurring**, or is **likely to occur**.

(Note: it **does not include** incidents “involving only the emission of any noise”)

Material Harm

s147 - Meaning of material harm to the environment

(1) For the purposes of (PoEO Act Part 5.7 - Duty to notify of pollution incidents):

(a) harm to the environment is material if:

(i) it involves **actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial**,

or

(ii) it results in **actual or potential loss or property damage** of an amount, or amounts in aggregate, **exceeding \$10,000** (or such other amount as is prescribed by the regulations),

and

(b) loss includes the **reasonable costs and expenses** that would be incurred in taking all reasonable and practicable measures **to prevent, mitigate or make good harm to the environment**.

(2) For the purposes of this Part (5.7 Duty to notify of pollution incidents), it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs

¹⁰ Protection of the Environment Operations Act 1997

Appendix 3 – About Sewerage Schemes

The townships of Narrabri, Boggabri and Wee Waa are mainly serviced by way of a *conventional gravity sewerage*. Narrabri township also some estates connected via *pressure sewerage*.

“Sewers” to transport and treat “sewage”

In each sewerage network, domestic and commercial sewage¹¹ is discharged to the Council sewer via a service connection which is the dedicated council connection point to the Council sewer. The sewage typically flows via these sewers under the force of gravity to *pump stations* from which the sewage is pumped via *rising mains* by to a *sewage treatment plant*. At the sewage treatment plant wastewater is treated to become *recycled water* of a quality that is acceptable for re-use, and a soil known as *biosolids* is also produced for re-use.

Low points where overflows most likely occur

Sewage overflows may occur in any location where a sewer network is located, but some locations have a higher likelihood and a higher impact than other based on their position in catchments.

Due to the long distance and the shape of terrain, low points exist in the network where sewage is most likely to discharge in the event of a sewer blockage or excessive rainfall infiltration event. Such low points will mostly include the sewage pump stations and the sewage treatment plant. Sometimes lowest points may be at manholes located beside watercourses.

Devices on Customer premises

Overflow Relief Gullies (ORGs)

Overflow-relief-gullies (ORGs) exist outside of buildings as a defined point of sewage discharge in the event of a downstream fault either in the customer’s on-site drainage, or in the downstream municipal network. ORG’s are intended to prevent backup of sewage into buildings. These devices must remain compliant with Australian Standard AS3500 which specifies the location and geometry for effective operation. They should be at least 75 mm above surrounding ground level unless in a pavement that directs a sewage overflow and stormwater away from the ORG without ponding. Customers must not direct stormwater into ORGs. The ORG grate should not be covered by any object.

Service-connection Inspection Opening (SIO)

The SIO is a vertical pipe with a cap located at the place where the customer sewer connects to the town sewer. The SIO belongs to the customer. The SIO is only for inspection and maintenance. The SIO must remain compliant with the relevant diagram in *NSC’s Sewer Junction Connection Policy* which depicts the location and geometry of SIOs. They must remain visible and accessible.

Customers to be aware of SIOs and ORGs but not interfere

Customers are encouraged to be aware of the location of SIOs and ORGs on their premises, and to understand how they work BUT must not interfere with these devices. If unsure, a registered plumber may be engaged to assist with this advice. Contact NSC customer service or visit NSC’s website for information.

Refer also Appendix 7 – Council Sewer Junction Connection Policy.

Pressure sewerage

Narrabri township possesses a number of estates serviced by pressure-sewerage system collecting sewage pumped from each premise. There are still ORGs on each premise the but there is no SIO. Instead of the SIO there is a “E/One” grinder pump station owned by the customer. The pump station pumps into a Council pressurised

¹¹ Comprises e.g. waste from toilets, bathrooms, laundries, and commercial trade waste.

pipe shared by a number of customers, which in turn discharges into an adjacent downstream gravity sub-catchment. *Refer also NSC's Pressure Sewer Connection Policy.*

Treatment Chemicals

Lime is dosed at NSC's sewage pump stations for odour control and used for clean-up of overflows. Deodoriser is used at the main sewage pump station. Safe handling procedures ensure public and employee safety

Appendix 4 – NSC Contact of third parties

ID	Entity	Number	Caller
<i>Mandatory contacts:</i>			
1	EPA Environment Line (provide written report within 7 days)	131 555	WSM
2	NSW Health	1300 066 055	WSM
3	Work Cover	131050	WOM
4	NSC Environmental Health Officer (EHO)	(02) 6799 6855	WSM
5	Fire & Rescue	000	WOM
<i>NSC should also contact the following entities (as applicable) as soon as practical:</i>			
6	Affected neighbours	Refer <i>Community Notification</i> below.	WOM
7	Fisheries (fish kills, disease)	1800 043 536	EHO
8	Chemical supplier	Refer to the MSDS	WOM
9	Other Emergency Contacts	Refer Appendix 5 – EMERGENCY CONTACTS	As applicable.

Appendix 5 – Emergency Contacts

Ambulance	000
Station – 66 Gibbons St, Narrabri	131 233
Fire Brigade	000
Rural Fire Service	000
Police Stations	000
State Emergency Services (SES)	132 500
Hospital	
Roads & Maritime Services (RMS) - General Enquiries	13 22 13
Electricity	
Essential Energy	13 23 91
Media	
<i>The Courier</i> (Newspaper)	6792 1011
Radio 2 Max FM 91.3	6792 4884
Radio ABC New England Northwest	1300 648 222 (talkback only)
WiRes (Wildlife Rescue)	13000 WIRES
	13000 94737
Animal Care	
Narrabri Veterinary Clinic	6792 4388
Workcover	131 050
Narrabri Office	6792 8720
Local Emergency Manager Officers (LEMO) - <u>EMPLAN</u>¹²	
Main – Darren Raeck	6799 6866
Deputy – Merle Westendorp	6799 6866
Narrabri Shire Council Engineering services Business hours (8.35AM to 5PM) incidents and faults and general enquiries	6799 6866
After-hours contact Public holidays and after-hours incidents and faults.	0429 911 111

¹² EMPLAN - Narrabri Shire Local Emergency Management Plan

Appendix 6 – RESTRICTED LISTING Emergency Contacts – NOT FOR PUBLIC USE

NARRABRI SHIRE COUNCIL DOCUMENT NUMBER 431054

Appendix 7 – Council Sewer Junction Connection Policy

NARRABRI SHIRE COUNCIL DOCUMENT NUMBER 1331809

Document located on Narrabri Shire Council Web Site at:

<http://www.narrabri.nsw.gov.au>



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