Pollution Incident Response Management Plan Volume 1 - Public Advice

Sewerage Services





POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN VOLUME 1 – PUBLIC ADVICE

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Revisions

Revision	Date	Checking	Author	Details
1 DRAFT	29/07/2016	MB in consultation with WOM, WSM	МВ	Implementation copy – internal review 1
1.2 DRAFT INTERNAL REVIEW	21/09/2016	MB in consultation with WOM, WSM, and NSC Env. Services representative	МВ	Implementation copy – internal review 2
1.3 FINAL COPY	29/11/2016	MB in consultation with WOM, WSM, and NSC Env. Services representative	МВ	Implementation copy for internet publishing
1.4 REVISION	15/11/2018	CHL	DR	Update details
1.5 REVISION	23/06/2020	Water Services Manager	ВА	Update details
1.6 REVISION	10/06/2021	Water Performance Reporting Officer	ТС	Update details
1.7 REVISION	05/06/2022	Water Performance Reporting Officer	SY	Update contact details and layout
1.8 REVISION	23/08/2024	Headworks Engineer	FV	Update Content

Circulation¹

Revision	Format	Hardcopy Access Location
Water Services Team	Hardcopy, Softcopy	NSC Depot, Sewer Treatment Plant Office
Local Emergency Management Committee (LEMC)	Hardcopy, Softcopy	NSC Administration, ECM
Customer Service Officers	Softcopy	NSC Administration, ECM
Community	Downloadable PDF	Council's website
ЕРА	Downloadable PDF	Council's website
ECM	Softcopy	Doc No:1500617

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 Management Plan
NA	Narrabri Township
NSC	Narrabri Shire Council
SNA	Narrabri (township) Sewerage Scheme
	Service Class = S = Sewerage, Community = NA = Narrabri
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
ORG	Overflow Relief Gully
SIO	Sewer Inspection Opening

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 sewage-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 <u>notify</u> the NSW EPA when such incidents cause or may cause <u>material harm</u>. 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 sewered 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:

- Procedure for Incident Response:
- 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 <u>not</u> 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

The entire team, from the Water Services Manager to the Water Services Operator, is responsible for the implementation of the Pollution Incident Response Management Plan. This involves ensuring compliance with relevant legislation and guidelines, coordinating response efforts, and maintaining regular updates and training to effectively manage pollution incidents.

Water Services Structure:



Duties and Responsibilities:

SN	Designation	Duties And Responsibilities		
1	Water Services Manager	Responsible for the overall implementation and update of the Pollution Incident Response Management Plan.		
2	Headworks Engineer	 Manages capital and operational works for the Council's wastewater collection and treatment infrastructure. Oversees and responds to pollution incidents related to sewer treatment plants and pump stations, ensuring appropriate measures are taken to mitigate and manage risks. 		
3	Operations Engineer	 Manages capital and operational works for the Council's wastewater reticulation system. Responsible for addressing pollution incidents associated with the wastewater reticulation network, including prompt response and 		



		coordination with relevant teams to contain and rectify issues.
4	Water Performance Reporting Officer	 Responsible for wastewater quality monitoring and sampling. Prepares the annual report and manages the EPA license requirements. Responsible for promptly reporting any pollution incidents to the Environmental Protection Authority (EPA) to ensure compliance and transparency.
5	Wastewater Treatment Plant Operators	 Directly oversees the operation and maintenance of the wastewater treatment plant, ensuring that all processes are functioning efficiently and in compliance with environmental standards. Provides immediate response and corrective actions in case of operational anomalies that could lead to pollution incidents.
6	Water Services Coordinators	 Responsible for the planning, operation, and maintenance of the wastewater reticulation network. Ensures that all aspects of the reticulation network are functioning effectively, and coordinates response efforts in the event of pollution incidents, facilitating swift restoration of normal operations.
7	Water Services Operators	 Supports the daily operations and maintenance of both wastewater and water supply systems. Monitors system performance and conducts routine checks to identify potential issues that could lead to pollution incidents.

In accordance with s153F of the PoEOAct, if a **pollution incident** occurs during 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 <u>EMPLAN</u> ⁵. 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.

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 PIRMP⁴ (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).

³ O - 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 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**

	Preparedness and Response					
Person	Daily Preparedness	For a <u>Pollution Incident</u> (P-I)	Critical Duties (P-I Management & Planning)			
All customers and the public.	 Keep NSC contact numbers handy (Appendix 5). Ensure premises comply with plumbing regulations (Appendix 3). 	 Avoid polluted areas. Contact a plumber for customerside faults. Report to Council for council-side faults and provide a verbal description. 	 Follow public advisories issued by the Council and comply with all safety directives. Engage in public awareness programs regarding sewer pollution incidents. 			
NSC Customer Service Agents	Be trained and familiar with the PIRMP, water industry competencies, and emergency procedures.	 Notify on-call staff and create Customer Service Requests (CSRs). Notify W&S Area Supervisor of non-trivial harm. 	 Log all customer contacts and actions during P-Is. Assist with the distribution of public notifications and handle customer inquiries on pollution incidents. Track incident trends. 			
Water Services Manager (WSM)	 Ensure PIRMP is tested and updated regularly. Oversee staff training and stakeholder consultations. Coordinate rapid response planning. 	 Ensure engineers complete required tasks. Contact EPA immediately if material harm occurs (PoEO Reg). Submit EPA report within 7 days post-incident.after the incident, provide EPA written report based on Appendix 1 – NSC Pollution Incident Form. Ensure contact with all relevant entities in Appendix 4 	 Oversee the entire P-I response and recovery process. Review and update the PIRMP annually or after significant incidents. Lead post-incident investigations and ensure lessons learned are applied. 			

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Water Services Engineers	 Ensure on-call staff and contractors have access to necessary equipment, including PPE. Perform routine inspections of the sewerage system. 	Notify W&S Operations Manager of material harm (non-trivial).	 Conduct root-cause analysis after incidents. Develop strategies to improve response times and reduce incident recurrence. Liaise with the Water Performance Reporting Officer to assess system performance.
Water Performance Reporting Officer	 Routinely monitor SCADA systems for alarms and early detection of incidents. Maintain all compliance and reporting data. 	 Notify Water Services Manager. Contact emergency services (Appendix 5). Coordinate landholder contacts. Complete Pollution Incident Form within 24 hours. 	 Analyse system performance data to predict and prevent potential P-Is Prepare detailed reports for internal and external stakeholders, including the EPA. Maintain and update incident tracking logs.
Water Services Coordinators	Ensure resources (e.g., vacuum trucks, pumps) are ready for rapid deployment. Develop maintenance schedules to prevent incidents.	 Ensure on-call operators complete assigned tasks. Communicate with affected persons. Complete NSC standard OHS Incident Form. 	 Supervise on-site operations during P-Is. Plan resource allocation to ensure timely response. Evaluate site-specific risks and mitigation strategies for future incidents.
NSC Water Services Operators	Be trained in PIRMP protocols, water industry competencies, and sewerage network operations. - Monitor infrastructure for signs of stress or malfunction.	 Respond via NSC's dedicated WPG for sewerage incidents. Notify W&S Area Supervisor of material harm. Secure the site and isolate pumps/equipment contributing to P-I. 	 Conduct site assessments during P-Is to mitigate further pollution. Implement real-time controls to contain and limit the spread of pollutants. Participate in debriefing and reporting sessions.

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 contamination and advise them to avoid activities such as swimming, fishing, shellfish 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 <u>**P-Is**</u> that cause <u>**material harm**</u> 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-brief³ is to be conducted for all such incidents. However, the Water Services Manager may also initiate debriefs for other incidents where they feel it is appropriate.

³ Emergency events may be emotionally traumatic.



Part C - Appendices Appendix 1 - NSC Pollution Incident Form

Date and Time of Incident		
Location		
Pollutants – Description, Quantity, Cond	centration	
Material Harm Caused – Include Costs		
Circumstances including cause if known	1	
EPA Verbal Contact – Dates, Times, Per	sonnel, EPA Directions	
Emergency Services Contact – Date, Tin	ne, Personnel, Emergency Service Respo	nse
Action taken or proposed		
Other relevant information (include all	Community notifications)	
Note – for more details, refer NSC stan	dard "INCIDENT FORM" that is complete	ed for all NSC incidents.
Reporting Officer <printed name=""></printed>	<signature></signature>	<date report="" signed=""></date>

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



APPENDIX 2 – KEY DEFINITIONS FROM POEO ACT 1997 4

Pollution Incident

pollution incident means

an incident or set of circumstances during (or because 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 <u>not trivial</u>, 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

⁴ 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 sewage⁵ 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 are collected and bunded on site.

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 <u>only</u> 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.

Also refer 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 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 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.

⁵ Comprises e.g. waste from toilets, bathrooms, laundries, and commercial trade waste.



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		
Man	Mandatory contacts:				
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		
NSC	NSC should also contact the following entities (as applicable) as soon as practical:				
6	Affected neighbours	Refer Community Notification 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	
The Courier (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) - EMPLAN	
Main – Eloise Chaplain	6799 6866
Deputy – Michael Cain	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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