



Pollution Incident Response Management Plan

Goulburn Wastewater Treatment System

Licence 1742

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Table of Contents

1.0	Introduction	3
2.0	Purpose	3
3.0	Scope.....	3
4.0	Incident Reporting	7
4.1	Incident Definition	7
4.2	Legal Duty to Notify	8
4.3	Incident Reporting	8
	Chart – 1 Chemical Related incidents Flow Chart.....	10
	Chart – 2 Sewer Related incidents Flow Chart.....	11
4.4	Sampling of Incident	12
4.5	Stakeholder Communication	12
5.0	Description and Likelihood of Hazards	12
5.1	Chemicals Stored at the Site	12
5.2	Types of Hazards / Risks.....	13
5.2.1	Pump Station Overflows	13
5.2.2	Loss of Power at the Wastewater Treatment Plant.....	13
5.2.3	Storages Reaching Capacity	13
5.2.4	Break in the Rising Mains.....	14
5.2.5	Sewer Overflow in Reticulation System.....	14
5.2.6	Chemical Spill at WWTP	14
	Pollution Incident Reporting Form.....	16

1.0 Introduction

This pollution management response has been written for the Goulburn Water Treatment System to fulfil the requirement of preparing and implementing a pollution incident response management plan.

Under Part 5.7A of the *Protection of the Environment Operations Act 1997 (POEO Act)*, there is a requirement to prepare, keep, test and implement a pollution incident response management plan.

The objectives of the plan are to:

- Ensure comprehensive and timely communication about a pollution incident to staff controlling the system, the Environment Protection Authority (EPA), Water NSW, NSW Health, Goulburn Mulwaree Council, Fire and Rescue and Safe Work NSW.
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability

2.0 Purpose

The purpose of the plan is to:

- Outline how the risk of a pollution incident will be minimise and controlled through the identification of risks and the development of planned actions to minimise and manage those risks.
- Document the notification protocol to ensure comprehensive and timely communication about a pollution incident is provided to all relevant stakeholders.
- Ensure the risks associated with the activity are mitigated, to ensure the protection of workers, community and the environment.
- Ensure compliance with all legislative requirements.

3.0 Scope

The licence is for the Goulburn Wastewater Treatment System. This system includes:

- sewer pumping stations
- the network from the pump stations back to the treatment plant
- Wastewater Treatment Plant
- Effluent Irrigation Area

The Wastewater Treatment Plant is located at 54-70 Ross Street Goulburn. It is located on the confluence of the Wollondilly and Mulwaree Rivers.

The effluent irrigation area extends between Gorman Road, Murray Flats Road and Taralga Road. The Wollondilly River flows through the site.

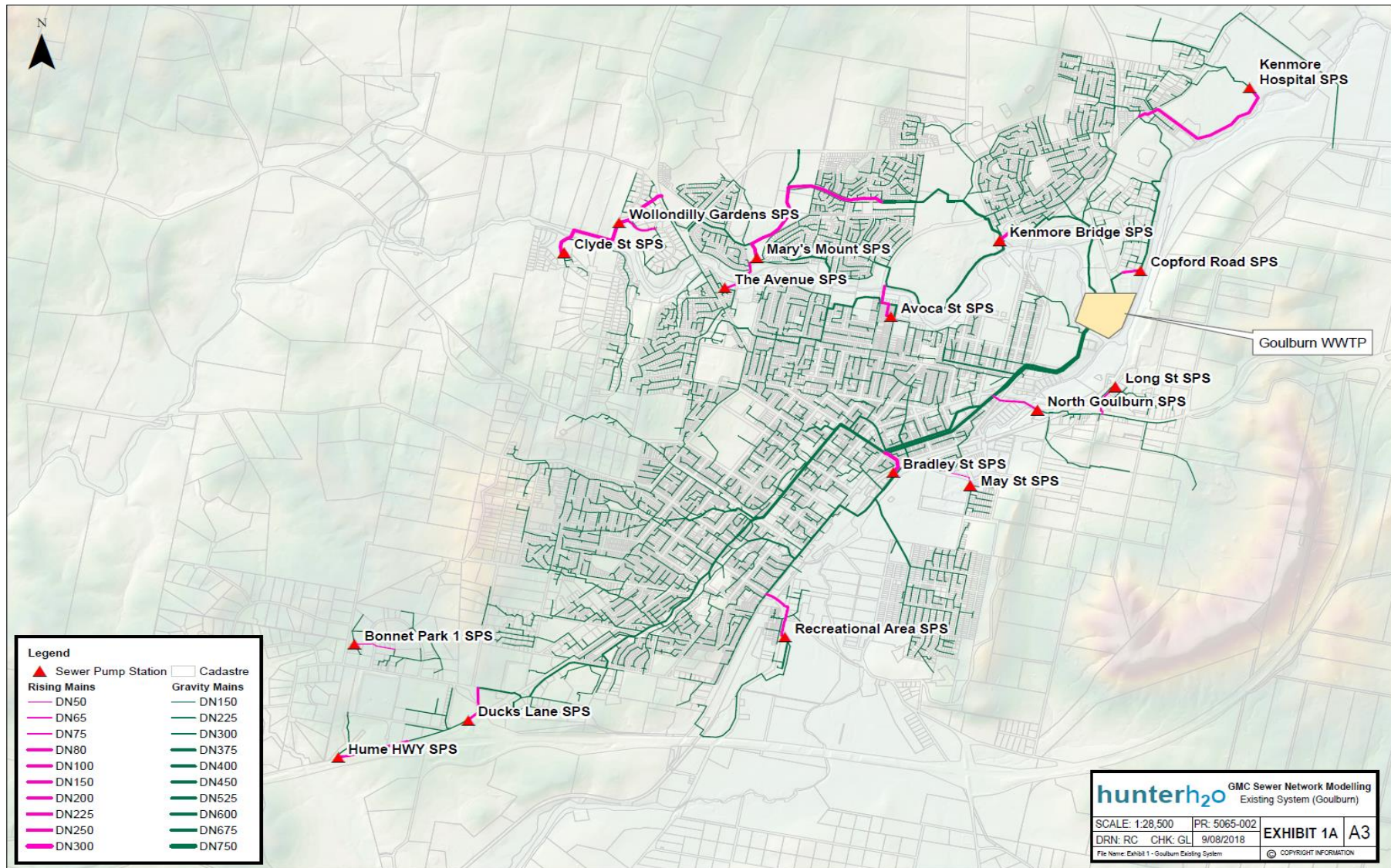
Figure 3.1 shows the location of the Wastewater Treatment Plant.



Figure 3.2 – Effluent Irrigation Area



Figure 3.3 – Goulburn Sewer network and SPS



4.0 Incident Reporting

4.1 Incident Definition

Pollution Incident

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

(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.

WHS Notifiable Incident

Some pollution incidents may also be classified as 'notifiable incidents' under WHS Law requiring Safe Work NSW to be notified. An incident can still be classified as a 'notifiable incident' even if the pollution is contained within the site without causing harm to the environment.

Under WHS Law a 'notifiable incident' is:

- (a) The death of a person
- (b) A 'serious injury or illness' or
- (c) A 'dangerous incident'

arising out of the conduct of a business or undertaking at a workplace.

'Notifiable incidents' may relate to any person – whether an employee, contractor or member of the public.

Only the most serious health or safety incidents are notifiable, and only if they are work related. They trigger requirements to preserve the incident site pending further direction from the regulator.

The WHS Law requires:

- (a) A 'notifiable incident' to be reported to Safe Work Australia immediately after becoming aware it has happened
- (b) If the regulator asks – written notification within 48 hours of the request, and
- (c) The incident site to be preserved until an inspector arrives or directs otherwise (subject to some exceptions)

Failing to report a 'notifiable incident' is an offence and penalties apply.

Dangerous incidents including 'near misses'

Some types of work related pollution incidents are classified as dangerous incidents and must be notified even if no-one is injured. Safe Work NSW must be notified of any pollution incident in relation to a workplace that exposes any person to a serious risk resulting from an immediate or imminent exposure to an uncontrolled escape, spillage or leakage of a substance.

If you are unsure about whether Safe Work NSW should be notified of a particular incident contact Councils Work Health and Safety Leader or Safe Work NSW for advice and further guidance. Contact details are provided below.

4.2 Legal Duty to Notify

It is the responsibility of all employees and contractors of Goulburn Mulwaree Council, who are engaged in any work activity on the Goulburn Wastewater Treatment System, to notify the Site Supervisor (or their delegate) of all environmental incidents and hazards that may result in an environmental incident or WHS notifiable incident, regardless of the nature or scale of the incident.

4.3 Incident Reporting

The responsible officer calling in the incident must ensure the Business Manager of Water Operations, Business Manager Infrastructure and Director of Utilities are also advised of the incident. For notifiable incidents Councils Work Health and Safety Leader must also be notified.

The following information must be recorded and reported to the relevant call centres:

1. The time and date of the incident
2. EPA Licence number of the facility, for all Goulburn WWTP and Goulburn Sewer Pump Stations the licence number is 1742.
3. The nature of the incident and the expected duration of the event (raw sewage, chemical spill etc)
4. The location of the incident and the place where the pollution is occurring or likely to occur;
5. The estimated quantity or volume of any discharge and the concentration of any pollutants involved;
6. The circumstances in which the incident occurred (flood, power failure etc);
7. The action(s) taken or proposed to deal with the incident and any resulting pollution or threatened pollution;
8. Details of any samples collected from the incident (all discharges to the environment will require collection and testing of samples);
9. Name and contact details of the person reporting the incident; and
10. Any other information requested.

Following initial calls to the required agencies a call back will usually be received within the following day from the EPA, Water NSW and NSW health requesting an email with further details of the incident.

For NSW Health – the contact person is Tabitha Holliday.

For GMC Environmental Services, Sarah Ainsworth (Business Manager Environment and Health) is the primary contact.

Environmental Incident

Any incident that may cause or threaten material harm to the environment shall be communicated to the following agencies immediately by the Waste Water Treatment Plant Supervisor (or their delegate) or the wastewater treatment plant on-call staff member in the Waste Water treatment Plant Supervisors absence:

- | | |
|--------------------------------------|-------------------------------------|
| 1. EPA Environment Line | 131 555 |
| 2. Water NSW Incident Line | 1800 061 069 |
| 3. NSW Health | 1300 066 055 or 0407 060 237 |
| 4. GMC Environmental Services | 4823 4454 |

For calls to Water NSW please ensure the operator is advised that the incident is within the Warragamba catchment where appropriate.

If unable to contact NSW Health through the above provided number an email should be sent as soon as possible by the Council officer calling in the incident to tabitha.holliday@health.nsw.gov.au advising of the incident.

WHS Notifiable Incident

Any incident that may result in a WHS notifiable incident shall also be communicated to the following agencies immediately by the Waste Water Treatment Plant Supervisor (or their delegate) or the wastewater treatment plant on-call staff member in the Waste Water treatment Plant Supervisors absence:

- | | |
|--|---------------------|
| 1. SafeWork NSW (for a WHS notifiable incident) | 131 050 |
| 2. Fire and Rescue (for large chemical spills) | 1300 729 579 |

Chart – 1 Chemical Related incidents Flow Chart

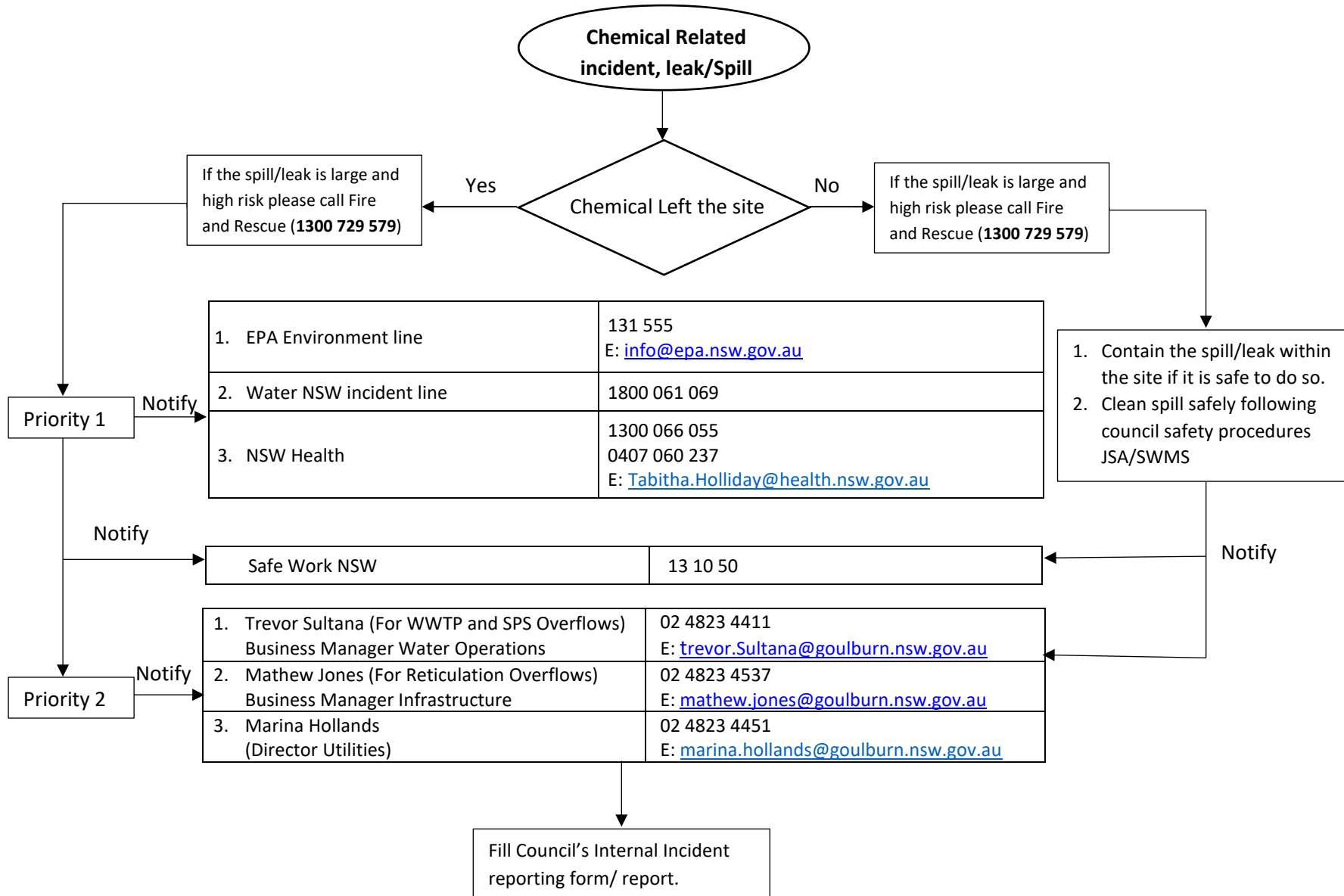
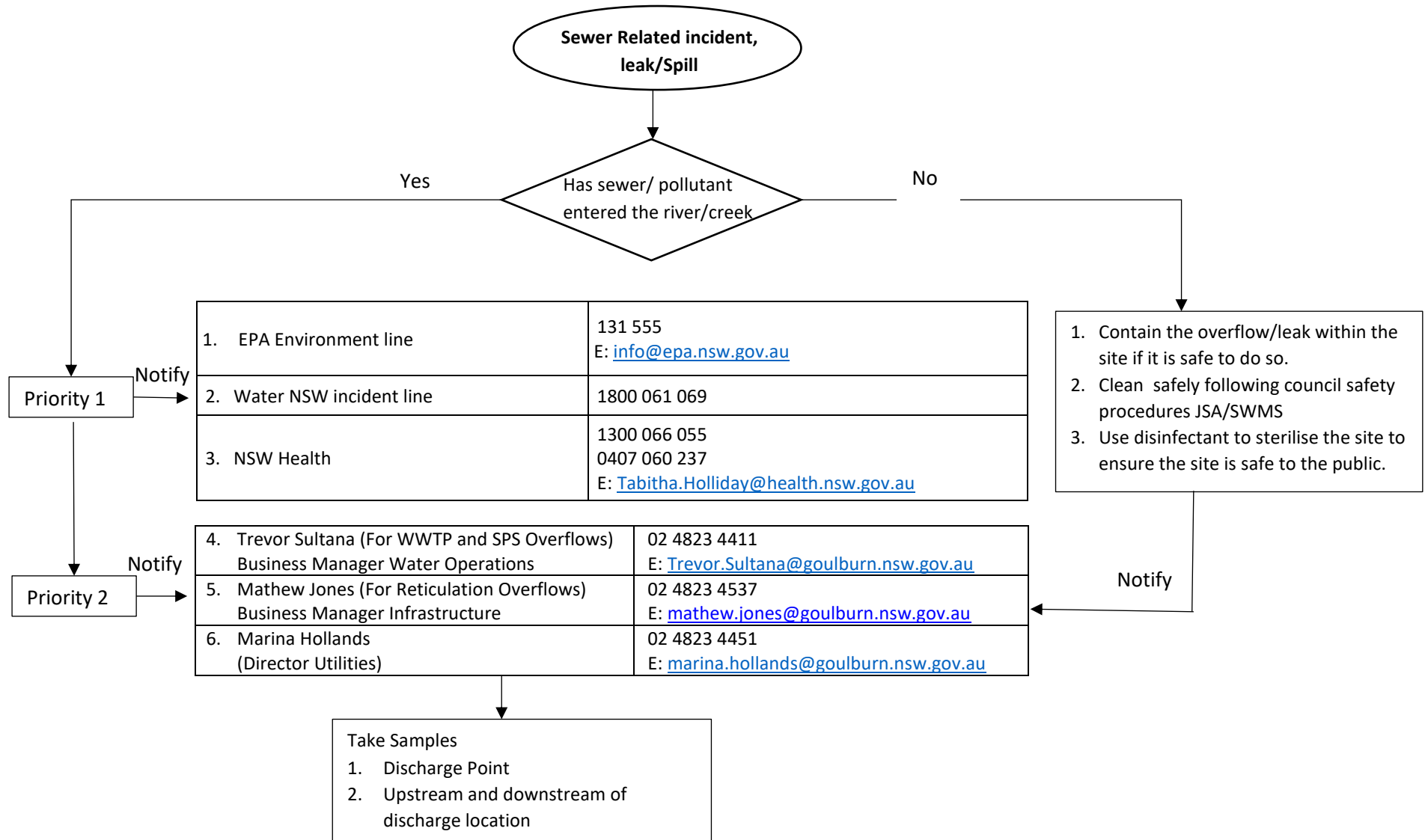


Chart – 2 Sewer Related incidents Flow Chart



4.4 Sampling of Incident

For all notifiable sewer overflow incidents samples must be collected as soon as possible at the discharge site as well as upstream and downstream of the discharge location, the samples collected must be sent to a NATA certified laboratory and tested for faecal coliforms.

For all notifiable chemical spill incidents to the environment advice should be requested from the EPA for required sample analysis.

The Council officer calling in the incident to the EPA is responsible for arranging sampling of the overflow. Councils Water Quality Officer can be contacted to assist.

4.5 Stakeholder Communication

The aim of stakeholder communication, following a pollution incident, is to ensure that people who may be potentially affected by the incident are notified. The aim is to advise potentially affected people of the event, what it means and how to avoid being affected by the incident. Mention will also be made of how Council has addressed the problem.

The requirement to notify downstream users and the method will be determined at the time of the event by Senior Council staff depending on the nature of the event. The EPA could direct Council to advise downstream users. Other regulatory organisations may also suggest that Council communicate specific events to the public.

Communication will be coordinated by Council's communications section. This may be in the form of media releases, radio interviews, signs, door knocking/letter box drops (for isolated areas) or notices on Council's website.

5.0 Description and Likelihood of Hazards

5.1 Chemicals Stored at the Site

The following bulk chemicals are stored at the site:

Storage Identifier	Storage Facility Type	UN Number	Proper shipping name	Class / Division	Packing Group	Max Capacity onsite	Typical Quantity	Tank Diameter
Sodium Hydroxide (Caustic Soda)	Above ground tank	1824	Sodium Hydroxide Solution	8	II	25 000 L	25 000 L	3.0m
Sodium Hypochlorite	Above ground tank	1791	Hypochlorite Solution	8	II	25 000 L	25 000 L	3.0m
Sulphuric Acid >51%	IBC	1830	Sulphuric Acid with more than 51% acid	8	II	1000L	1000L	
Citric Acid Solution	IBC	N/A	Citric Acid Solution	-	-	1000L	1000L	
Alum	above ground tank	N/A	Aluminium Sulfate, hydrated	-	-	50 000L	50 000L	2 tanks, 3.0m

Other chemicals are stored onsite in smaller quantities. A comprehensive list of chemicals can be found on the hazardous chemical register.

5.2 Types of Hazards / Risks

5.2.1 Pump Station Overflows

Pump stations could overflow in the event of:

- Pump failure
- Pump blockages
- Blockages in the main
- Power Outages

Most of the Goulburn Sewer Pump Stations discharge to an adjacent river.

Each pump station is configured with a series of alarms that are activated upon the filling of the well beyond normal operating levels. A series of alarms are activated by the telemetry to the operator giving time for the operator to visit the site and repair, unblock or replace the pump at the site before any sewage leaves the station. The only time sewage is discharged from the station under these circumstances is when the telemetry system is not functioning correctly and alarms have not been received by the operator.

Pump failures are dealt with by either unblocking the pump or arranging the immediate replacement of the pump with a spare pump that is stored for the majority of pump stations.

The Recreational Area SPS only has one pump within the wet well, with a spare pump stored on site. In the event that the pump within the wet well cannot function, Council staff can arrange for the spare pump to be installed.

Power outages are another issue that can lead to station overflows. Most of the larger pump stations have generators on site. These stations include Bradley Street, Kenmore Bridge, Avoca Street, Marys Mount, The Avenue, Copford Road, Recreation Area, North Goulburn, Ducks Lane and Hume Highway. These all turn on automatically when the power supply is lost at the site.

For the other pump stations without generators, a mobile generator is taken out to the site or a tanker is arranged to pump out the well.

5.2.2 Loss of Power at the Wastewater Treatment Plant

Power is required at the current wastewater treatment plant to ensure treated effluent is transferred to the storages at Gorman Road and internally at the Wastewater Treatment Plant.

In the event of a power failure at the plant, a diesel generator will engage and provide power to keep the site running.

5.2.3 Storages Reaching Capacity

GMC has approximately 40ML of storage at the Wastewater Treatment Plant and 740 ML of storage at Gorman Road. Unfortunately during severe wet weather events, this is not enough storage and overflows may be required.

There is no overflow point at Gorman Road so overflows need to be managed from the storm flow pond at Ross Street when required.

5.2.4 Break in the Rising Mains

A break in a rising mains could occur from any of the pump stations or in either of the mains between the treatment plant and the farm.

There are two rising mains from Ross Street to Gorman Road. The original main is a 375mm AC main and the newer main is a 375mm DICL. Two mains are used in unison to pump to the farm. One line could be turned off during dry weather for Council Crews to repair the break. During wet weather, a combination of turning off one main and pumping to the Ross Street storage dam would allow repairs to be performed.

The other rising mains around town would be dealt with by turning off the pump station in order to drain the main for repairs. A tanker would be arranged to pump sewage out of the station while the Council Crew repaired the main.

5.2.5 Sewer Overflow in Reticulation System

Sewer chokes and blockages in the reticulation system can cause overflows if not acted on quickly. Council carries out a maintenance program to clean and inspect sewer (gravity) mains to ensure that chokes and blockages can be avoided or detected before they become an issue.

Where blockages are unavoidable, Council staff attend to the emergency to unblock the main as quickly as possible to restore service to the main. Council staff are also available out-of-hours if an issue occurs. Where sewerage has overflowed, Council staff use disinfectant to sterilise the site to ensure the site is safe to the public.

5.2.6 Chemical Spill at WWTP

A chemical spill could occur at the Wastewater Treatment Plant due to failure of the fittings or structural failure of the tanks. For fitting or structural failure, the chemical storage area is surrounded with concrete bunding to contain the stored chemicals until clean up occurs. There are also smaller spill kits to use for any smaller spills onsite. There are numerous emergency showers onsite for use. All spills must be cleaned up in accordance with the MSDS for the chemical.

All major chemical spills that occur even if contained within the bunded areas are 'notifiable incidents' requiring Safe Work NSW to be contacted immediately.

Version Control

Date	Changes	Comments	Initial
13/12/2022	Change EPA contact	Change EPA contact from dane.graham@epa.nsw.gov.au to info@epa.nsw.gov.au	TS
22/11/2022	Minor spelling changes	Annual Review	TS
16/11/2022	Spelling Correction- Incident to Incident	Comment from WWTP Staff	
02/11/2022	Update contact details for EPA, remove email address for Water NSW	Annual Review	
15/12/2021	Formatting changes, addition of licence number details and flow charts for notification	Reviewed and updated in preparation for end of year closures.	
27/08/2021	Details of WHS notifiable incidents added	Changes made following leak of Sodium Hypochlorite tank in banded area.	
02/07/2020	Inserted sampling requirements for sewer overflows and updated NSW Health contact number	Updated following sewer overflow event on 28/05/2020	
20/05/2020	Updated following test run of chemical spill	Info on WWTP hazardous chemical register added.	
18/09/2019	Reviewed	New Wastewater treatment plant nearing completion, PIRMP will need to be reviewed after commissioning.	
18/09/2018	Changed	Wastewater treatment plant section updated to reflect new plant.	

Pollution Incident Reporting Form

Goulburn Wastewater Treatment System

EPA Licence Number 1742

Time and date of incident	
Name and contact details of person reporting the incident.	
The nature of the incident (raw sewage overflow from pump station, chemical spill etc)	
The location of the incident and the place where pollution is likely to occur (eg. May Street SPS power failure, raw sewage entering Mulwaree Ponds)	
The estimated volume of any discharge and the concentration of pollutants involved (If volume is unknown try and provide an estimate and advise of the pollutant type, raw sewage chemicals etc)	
Reason for the incident occurring (power failure, flooding etc)	
Actions being taken or proposed to be taken to deal with the incident (restoration of power, containment of spill, wait for flood waters to recede etc)	
Details of samples collected for testing from the incident	

Notification Record

Agency / Officer Notified	Date and Time of Notification	Comments
NSW EPA 131 555 info@epa.nsw.gov.au		
Water NSW 1800 061 069		
NSW Health 1300 066 055 or 0407 060 237 Tabitha.Holliday@health.nsw.gov.au		
GMC Environmental Services 48234454 sarah.ainsworth@goulburn.nsw.gov.au		
Safework NSW (only for a WHS notifiable incident) 131050		
Fire and Rescue (for large chemical spills) 1300 729 579		
Business Manager Water Operations Trevor Sultana 0418 480 557 trevor.sultana@goulburn.nsw.gov.au		
Director Utilities Marina Hollands 0417 140 204 marina.hollands@goulburn.nsw.gov.au		

Additional comments regarding the pollution incident:
