




Greater Hume Shire

simply greater



**Greater Hume
Pollution Incident Response
Management Plan**

Walla Walla Sewage Treatment Plant

Document Control		Pollution Incident Response Management Plan		 Greater Hume Shire <small>simply greater</small>	
		Walla Walla Sewage Treatment Plant			
		July 2013			
Document Register Number: WS.STRAT.0002.002					
Rev No	Date	Revision Details	Author	Reviewer	Approver
1	7 August 2013	First Edition	Manager Water and Sewer	Director Engineering	General Manager

Prepared By:
 Greater Hume Shire Council
 With Assistance From
 Daryl McGregor Pty Ltd, Engineering Consultants
 Strategies for a Water Efficient Future

Document Status and Release Information




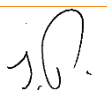
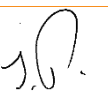
Daryl McGregor Pty Ltd
 ABN 63 119 722 093
 641 Macauley Street
 Albury NSW 2640 Australia
 T: 61 2 6041 6403
 F: 61 2 6041 6403
 M: 0417 271 618
 E: darylm@bigpond.com

Client:	Greater Hume Shire Council
Project No:	1057/13A
Document Title:	Pollution Incident Response Management Plan – Walla Walla STP

Copyright/ Disclaimer

This document is and shall remain the property of Daryl McGregor Pty Ltd. The document may only be used for the purposes for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.

Document Status

Rev No.	Prepared By		Reviewer		Approved for issue	
	Name	Date	Name	Signature	Signature	Date
0 - Draft	D. McGregor	16/07/13	D. McGregor			17/07/13
1 - Final	D. McGregor	18/07/13	D. McGregor			18/07/13
2 - Revised	T. Plunkett	22/09/16	T. Plunkett			29/09/16

Executive Summary

This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflects the requirements specified in the Environment Protection Authority's (EPA's) *Guidelines: Preparation of Pollution Incident Response Management Plans, March 2012*.

It identifies the hazards to the environment associated with the Walla Walla Sewage Treatment Plant and its operations; provides pre-emptive measures to reduce such hazards, details the essential contact and communication mechanisms in the case of an incident.

The PIRMP also details:

- Procedures for notifying a pollution incident to relevant persons;
- Actions to be taken to reduce and/or control pollution; and
- Procedures for co-ordinating those notified and any action taken in combating the pollution.

Maps and information about the training of staff and testing of the plan are also included.

The structure of the plan is in accordance with the requirements set out in part 5.7A of the POEO Act and the Protection of the Environment (General) Amendment (Pollution Incident Response Management Plans).

This plan will also be utilised by Greater Hume Shire Council as an effective review and planning tool in managing Council's licence obligations and to enhance Council's environmental management.

It will complement Council's Environmental Management Plans and Emergency Response Plans.

This page is intentionally left blank.

Table of Contents

1.0	Introduction	4
1.1	Purpose of Report	1
1.2	Definition of a Pollution Incident.....	1
1.3	Walla Walla STP's EPA Licence	1
1.4	Treatment Plant Details	2
2.0	Descriptions of Hazards to Human Health or the Environment and Likelihood of Occurrence ...	4
2.1	Potential Pollution Incidents	4
2.2	Likelihood of Occurrence.....	4
3.0	Pre-Emptive Actions to Minimise Risk to Human Health or the Environment.....	8
4.0	Inventory of Pollutants and Details of Storage Locations	11
5.0	Description of Safety Equipment or Other Devices Used to Minimise Risk and To Control a Pollution Incident	12
6.0	Contact Details.....	13
6.1	Definition of Pollution Incident	13
6.2	Notification of Pollution Incident	13
6.3	List of Those Authorised To Notify Relevant Authorities Under Section 148 Of POEO Act ...	16
7.0	Communication with Neighbours and Local Community.....	17
	19
9.0	Actions to be Taken During or Immediately After a Pollution Incident, Including Early Warnings, Updates and Actions to be Undertaken by the Media	20
10.0	Staff Training	21
11.0	Making Plans Available.....	22
12.0	Testing Plans Once Every 12 Months.....	23
13.0	Appendices	24
13.1	Appendix A: Risk Assessment Matrix	24
13.2	Appendix B: Pollution Incident Reporting Form	27
13.4	Appendix C: PIRMP Testing and Update Registersand Update Register.....	29
13.5	Appendix D: Staff Training Register	30
13.6	Appendix E: Site Plan	31

This page is intentionally left blank.

1.0 Introduction

1.1 Purpose of Report

Changes to the Protection of the Environment Operations Act 1997 (POEO Act) came into force on 29 February 2012. The changes effectively require licence holders to develop, implement and formally test Pollution Incident Response Management Plans (PIRMPs) for each of their licensed activities.

The requirements are set out in part 5.7A of the POEO Act and details are contained in the Protection of the Environment (General) Amendment (Pollution Incident Response management Plans). This PIRMP has been prepared in accordance with those requirements.

Greater Hume Shire Council intends not only to implement this PIRMP for Walla Walla Sewage Treatment Plant (STP), but also to use it as an effective review and planning tool in managing Council's licence obligations and to enhance Council's environmental management.

It will complement Council's Environmental Management Plans and Emergency Response Plans.

1.2 Definition of a 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 1997:

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."

1.3 Walla Walla STP's EPA Licence

The Walla Walla Sewage Treatment Plant operates under EPA Licence No. 2563. The licence authorises Council as the operator and licence holder to discharge up to 550 kl/day of treated effluent.

The treatment plant provides tertiary treatment via a pasveer channel which provides extended aeration (activated sludge) treatment; and effluent is reused at the St Paul's Lutheran College School ovals, agricultural paddocks and gardens.

1.4 Treatment Plant Details

Walla Sewerage Scheme was constructed in 1981. It services 253 residential assessments, 34 non-residential assessments and covers an area of 82ha within the Walla Walla urban area. The sewerage scheme comprises approximately 0.73km of rising mains, 8.6km of reticulation pipelines, four sewage pump stations and the Walla Walla Sewage Treatment Plant.

The Walla Walla Sewage Treatment Plant (Walla Walla STP) consists of a pasveer channel, two sludge lagoons, intermediate pond and two tertiary effluent ponds. The pasveer channel capacity is a 1,000 EP (1000 persons channel).

The pasveer channel provides activated sludge treatment process of the raw sewage influent operating in the intermittent extended aeration mode. As an extended aeration system with a sludge age in excess of 20 days it produces an aerobically digested sludge as well as a high quality effluent.

Effluent is currently held in a 30 day effluent pond which provides tertiary treatment (aerobic process) sunlight (UV) disinfection and further settlement of solids. Effluent is discharged under licence to an additional 15 day effluent pond and then to a 10ML reuse storage dam constructed in 2001 as part of an effluent reuse scheme. This scheme provides treated effluent to an adjacent private school and any excess effluent not required by this scheme overflows under licence to the adjacent Petries Creek.

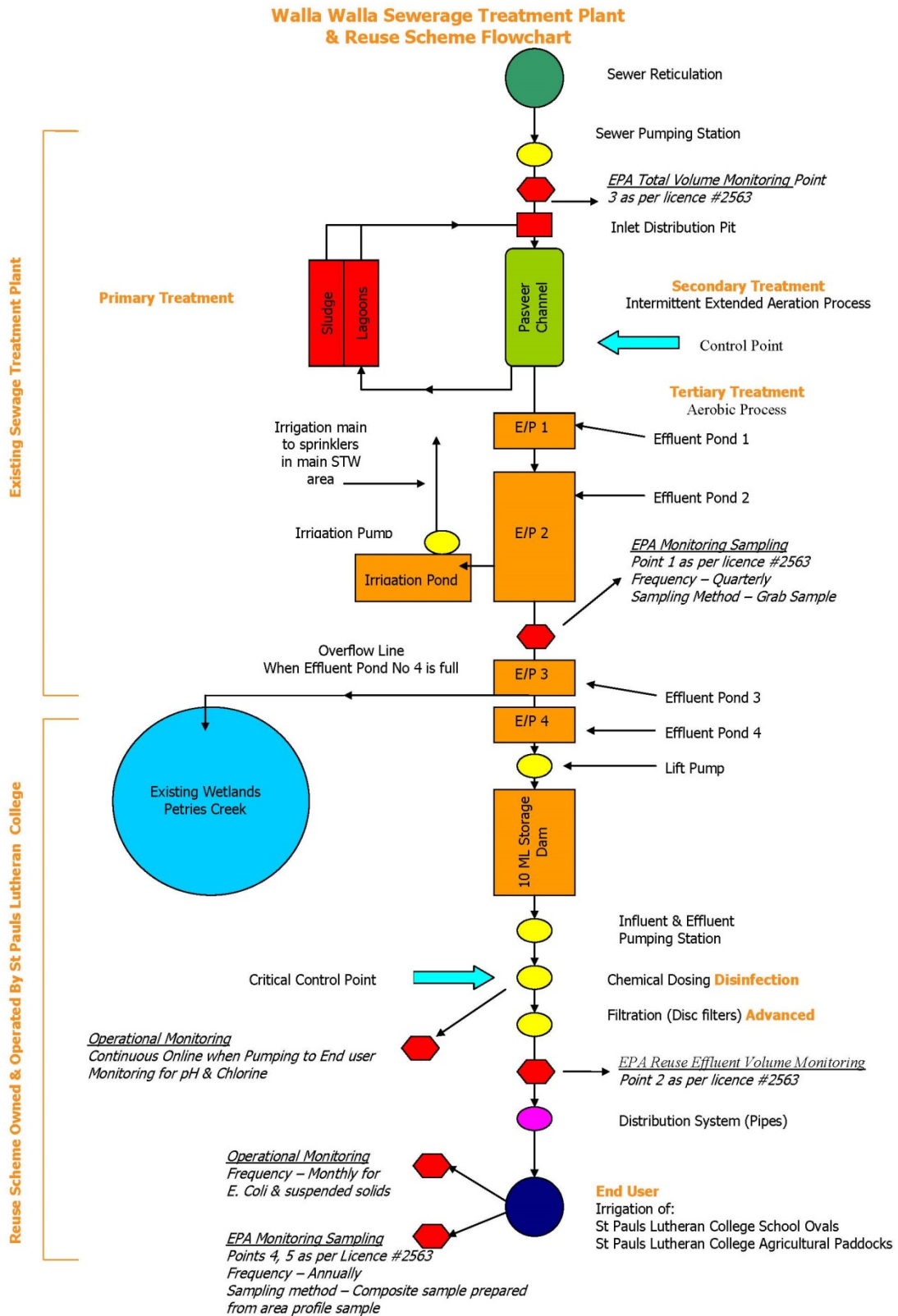


Walla Walla Sewerage Reuse Scheme

The Walla Walla Sewerage Reuse Scheme was constructed in 2001. It comprises approximately 1.82km of reuse supply mains and 1 reuse treatment plant located on St Paul's College land adjacent to the Walla Walla STP. It pumps effluent from a 10ML storage dam through a series of disc filters then is chemically dosed for PH correction and disinfection. It is then pumped to three locations for irrigation which are St Paul's College pastures north east of storage dam and two sporting ovals located at the college site, corner Pioneer Drive and Klemke Avenue, Walla Walla. The reuse scheme is owned and operated by St Paul's College and jointly monitored by college staff and Greater Hume Shire Council staff.

A schematic of the Walla Walla STP treatment system is shown in Figure 1 on page 3.

Figure 1: Walla Walla STP Flowchart



2.0 Descriptions of Hazards to Human Health or the Environment and Likelihood of Occurrence

2.1 Potential Pollution Incidents

The potential main hazards to human health or the environment – i.e. 'Pollution Incidents' - associated with the activities undertaken at this site include the following:

- Wet weather overflow from the reticulation system **during wet weather**;
- Dry weather overflow from the reticulation system **during dry weather**;
- Wet weather bypass at the Walla Walla STP which may occur when untreated sewage bypasses the sewage treatment process and discharges to the environment **during wet weather**;
- Dry weather bypass at the Walla Walla STP which may occur when untreated sewage bypasses the sewage treatment process and discharges to the environment **during dry weather**;
- Pond failure at the Walla Walla STP;
- Mechanical failure at the Walla Walla STP resulting in discharge of untreated sewage;
- Mechanical failure at the Walla Walla STP resulting in offensive odour from the premises;
- Inadequate chemical storage and/or chemical handling;
- Acts of vandalism or target of terrorist activity at the Walla Walla STP;
- Discharge pipeline breakage;
- Exceed EPA discharge limits; or
- Significant adverse environmental impact resulting from irrigation in utilisation areas.

Other potential hazards include:

- Inappropriate sludge handling and/or disposal
- Structural failure of treatment units resulting in release of untreated or partially treated sewage
- Failure of pump(s) resulting in release of sewage or effluent to the environment
- Uncontrolled release of gases or odours
- Flooding of process units or storage ponds resulting in release of pollutants to the environment
- Illegal dumping of pollutants into the sewerage system
- Staff coming into contact with raw sewage or partially treated sewage
- Public coming into contact with raw sewage or treated effluent.

2.2 Likelihood of Occurrence

Each of the hazards is listed in Table 1 on page 5 and their likelihood of occurrence defined. The Risk Assessment Matrix used to derive the likelihood of occurrence is appended in *Appendix A*.

Table 1: Pollution Incident Classification, Risk Assessment and Contributing Factors

Risk	Description	Consequence	Likelihood	Contributing factors	Overall Risk Rating
Overflows and Bypasses					
	Wet weather overflow from the reticulation system during wet weather.	Moderate	Rare	Prolonged periods of heavy rain, heavy infiltration of stormwater into the sewer network.	Low
	Dry weather overflow from the reticulation system during dry weather.	Moderate	Rare	Mechanical failure of plant and equipment. Infrastructure failure.	Low
	Wet weather bypass at the Walla Walla STP and is when untreated sewage bypasses the sewage treatment process and discharges to the environment during wet weather.	Moderate	Unlikely	Prolonged periods of heavy rain, lack of maintenance and/or a mechanical failure of plant and equipment.	Medium
	Dry weather bypass at the Walla Walla STP when untreated sewage bypasses the sewage treatment process and discharges to the environment during dry weather.	Moderate	Unlikely	Lack of infrastructure maintenance and/or a mechanical failure of plant and equipment.	Medium
	Pond failure at the Walla Walla STP.	Minor	Rare	Prolonged periods of heavy rain, lack of pond and site maintenance and/or a mechanical failure of plant and equipment.	Low
	Mechanical failure at the Walla Walla STP results in discharge of untreated sewage.	Major	Rare	Fire damage or poor maintenance of plant and equipment. Prolonged periods of heavy rain.	Medium
	Flooding of process units or storage ponds resulting in release of pollutants to the environment.	Moderate	Rare	Prolonged periods of heavy rain, lack of pond and site maintenance and/or a mechanical failure of plant and equipment.	Low

Risk	Description	Consequence	Likelihood	Contributing factors	Overall Risk Rating
Odours					
	Mechanical failure at the Walla Walla STP results in offensive odour from the premises.	Moderate	Unlikely	Fire damage or poor maintenance of plant and equipment.	Medium
	Uncontrolled release of gases or odours.	Moderate	Unlikely	Poor maintenance; process and/or equipment failure.	Medium
Chemicals					
	No chemicals are used or stored at the Walla Walla STP.				
Vandalism					
	Acts of vandalism or terrorist activity at the Walla Walla STP.	Major	Rare	Increased risk during hours of closure.	Medium
Pipe failure					
	Discharge pipeline breakage.	Moderate	Rare	Poor maintenance of plant and equipment. Flows exceeding pipe and pump capacity.	Low
Structural failure					
	Structural failure of treatment units resulting in release of untreated or partially treated sewage.	Major	Rare	Poor maintenance or design; overloading of plant; vandalism or other attack on the plant.	Low
	Failure of pump(s) resulting in release of sewage or effluent to the environment.	Moderate	Unlikely	Poor maintenance, electrical failure.	Medium

Risk	Description	Consequence	Likelihood	Contributing factors	Overall Risk Rating
Licence Exceedence					
	Exceed Environment Protection Licence (EPL) discharge limits to the environment.	Minor	Unlikely	Prolonged periods of heavy rain overloading of plant; mechanical failure of plant and equipment; treatment process failure.	Low
Irrigation Activities					
	Significant adverse environmental impact from irrigation in utilisation areas.	Minor	Unlikely	Human error. Lack of control and/or monitoring. Prolonged periods of heavy rain.	Low
Sludge Handling					
	Inappropriate sludge handling and/or disposal.	Minor	Unlikely	Human error. Prolonged periods of heavy rain.	Low
Trade Waste					
	Illegal dumping of pollutants into the sewerage system.	Major	Rare	Poor implementation of Trade Waste Policy.	Medium
Staff Contact With Pollutants					
	Staff coming into contact with raw sewage or partially treated sewage.	Moderate	Rare	Inappropriate work practices and carelessness.	Low
Public Contact With Pollutants					
	Public coming into contact with raw sewage or treated effluent.	Moderate	Unlikely	Poor site management and supervision.	Medium

3.0 Pre-Emptive Actions to Minimise Risk to Human Health or the Environment

Council undertakes a number of pre-emptive actions to minimise risk to human health and the environment. These are described below:

1. Effluent and Sewage Overflows

Wet weather and dry weather overflows from the sewerage reticulation system are low risk events as determined in the Risk Assessment (Table 1 above).

Staff maintain the system on a daily basis and all blockages in the system are cleared promptly.

In times of high wet weather flows, there is the potential for the capacity of the Treatment Plant to be exceeded, resulting in overflows. This is considered unlikely, with a medium overall risk rating (refer Table 1 above). Influent can be diverted directly to the storage lagoons in the event of extreme wet weather events.

Pond failure is an extremely unlikely event. The storages are regularly inspected to ensure there are no leaks and staff maintains all facilities at the Walla Walla STP on a daily basis.

Mechanical failure at the Walla Walla STP has been assessed as a medium overall risk (refer Table 1 above). Independent assessment of the plant is carried every five years as part of the mandatory asset valuation process. Any structural issues can be actioned at that time. Plant operators are fully trained and they inspect and monitor the plant daily.

Flooding of the process units or storage ponds is a low risk hazard. The State Emergency Service has Emergency Management Plans in place to warn of any impending flood. The dilution level of any overflow during an extreme event will significantly reduce the impact of any pollutants released.

2. Odours

The risk of odours resulting from mechanical failure of plant and equipment or uncontrolled release of gases has been assessed as medium risk events. Council staff maintain all plant and equipment at the Walla Walla STP on a continuous basis and any faulty equipment is either repaired or replaced.

Process failures are mitigated by the on-going monitoring of the plant by Council's trained operators.

3. Storage of Chemicals

No chemicals are used or stored at the Walla Walla STP.

4. Vandalism

The Walla Walla STP is securely fenced and is patrolled by Council staff.

5. Pipe and Structural Failures

An independent assessment of Council's assets is carried out every five years as part of the mandatory asset valuation process. Any issues with pipes, pump stations and other infrastructure can be actioned at that time. Council's maintenance staff are fully trained and they regularly inspect all sewerage infrastructure.

6. Licence Exceedence

On-going monitoring of the treatment processes and sampling and testing of effluent mitigate the risks associated with licence exceedence. If any testing indicates an exceedence, irrigation of effluent would cease until the problem with the treatment plant was corrected.

7. Irrigation Activities

On-going monitoring of the treatment processes and sampling and testing of effluent mitigate the risks associated with reuse of effluent at the nominated irrigation sites. If any testing indicates an exceedence, irrigation of effluent would cease until the problem with the treatment process was corrected.

8. Sludge Handling

All sewage sludge is stored and disposed of on site, thus minimising the risk of contaminants moving off site.

9. Trade Waste

Council has a Trade Waste Policy in place which prevents the discharge of;

- organochlorine weedicides, fungicides, pesticides, herbicides and substances of a similar nature
- organophosphorus pesticides and/or waste arising from the preparation of these substances
- any substances liable to produce noxious or poisonous vapours in the sewerage system
- radioactive substances
- organic solvents and mineral oil
- any flammable or explosive substance
- chromate from cooling towers
- natural or synthetic resins, plastic monomers, synthetic adhesives, rubber and plastic emulsions
- rain, surface, seepage or subsoil water
- solid matter
- any substance assessed as not suitable to be discharged into the sewerage system
- waste that contains pollutants at concentrations which inhibit the sewage treatment process.

10. Personnel Coming Into Contact With Raw Sewage

Council has in place Work Place Health and Safety documentation at the Walla Walla STP and staff are trained in all aspects of workplace health and safety.

Treatment plant operators are required to have designated inoculations to protect them.

There is no public access to the Walla Walla STP.

Site visitors are given the appropriate induction before proceeding on a tour of the plant and care is taken by staff to ensure that they are not exposed to any risk of contact with the raw sewage or treated effluent.

11. Public Contact With Raw Sewage Or Treated Effluent

Treated effluent is utilised at the wetlands and at the two irrigation sites.

Irrigation of the effluent is controlled by Council's Site Management Plan which restricts public access to the sites during irrigation and for a period after irrigation ceases.

Access to the wetlands is also restricted and the precautions discussed in 10. above apply.

4.0 Inventory of Pollutants and Details of Storage Locations

1. Chemicals

No chemicals are stored at the Walla Walla STP.

2. Sewage Effluent

Treated effluent is stored at the Walla Walla STP at the following locations:

- a) the Effluent Ponds (1, 2, 3 and 4)
- b) the 10 ML Storage Dam
- c) the Wetlands.

Raw sewage passes through the treatment process with minimum storage time.

5.0 Description of Safety Equipment or Other Devices Used to Minimise Risk and To Control a Pollution Incident

The Walla Walla STP building is protected from fire by fire extinguishers.

Personal protective equipment (PPE) is provided for on-site staff which consists of overalls, rubber boots, chemical goggles, face shields, safety shoes, elbow-length impervious gloves, splash aprons and air supplied respirators.

6.0 Contact Details

6.1 Definition of 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 1997:

- 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, 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."*

6.2 Notification of Pollution Incident

Notification Speed of Response

The requirement for notification of a pollution incident has changed from 'as soon as practicable' to 'immediately'. In short, 'immediately' means 'promptly without delay', but it does not mean undertaking notification ahead of doing what is necessary to make safe.

Notification of Relevant Authorities

If the pollution incident is a wet weather overflow, dry weather overflow, wet weather bypass or dry weather bypass procedures need to be followed in Council's *PRP 101 Incident Notification Protocol, August 2012*.

In all other pollution incident cases and where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Site Supervisor:

Relevant Authorities to be Notified

1. Emergency Call Services
 - Emergency Hotline Number (24 hours) 000*

***The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number.**

2. Greater Hume Shire Council
 - Greater Hume Shire Council Water and Sewerage 0408 691 637
3. The Environment Protection Authority (EPA)
 - Albury Regional Office 02 6022 0600
 - Emergency Hotline Number (24 hours) 131 555
4. NSW Ministry of Health (via Public Health Units)
 - Albury Regional Office 02 6841 5569
 - Public Health Officer on Call (24 hours) 0418 866 397
5. WorkCover NSW
 - Hotline Number 131 050
6. Fire and Rescue NSW
 - Walla Walla Fire Brigade 02 6029 8202
 - Rural Fire Service Control Centre 02 6051 1511
7. SES Walla Walla 02 6029 8866

If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the Site Supervisor is still required to contact the above except for dialling 000.

Key Council staff contact details are listed in Table 2 on page 15

Table 2: Key Council Staff Contact Details

Name	Job Title	Contact No.	Qualification/Competencies
Thomas Plunkett	Manager Water and Sewer	02 6029 8588 0427 480 915	1A – Trickling Filters and Oxidation Ponds (PWD) 1B – Activated Sludge and Aerated Lagoons (PWD) Confined Space Entry.
Paul Day	Water and Sewer Overseer	0458 058 389	Part 1. Waste Water Treatment Operations (OOW) In training Part 2. Advanced Treatment (OOW) In training Confined Space Entry.
Jeremy Head	Water and Sewer Operator	0407 018 572	Part 1. Waste Water Treatment Operations (OOW) Part 2. Advanced Treatment (OOW) In training Confined Space Entry Chemical Handling.
Trent Brown	Water and Sewer Operator	0417 487 899	Part 1. Waste Water Treatment Operations (OOW) In training Part 2. Advanced Treatment (OOW) In training Confined Space Entry Chemical Handling.
Mark Nichols	Water and Sewer Operator	0417 487 899	Part 1. Waste Water Treatment Operations (OOW) Part 2. Advanced Treatment (OOW) Confined Space Entry Chemical Handling.
Colin Summers	Water and Sewer Operator	0429 076 196	Certificate 111 in Waste Water Operations(NRT) Part 2. Advanced Treatment (OOW) Confined Space Entry Chemical Handling.
Emergency On Call Phone	Water and Sewer Operators	0408 691 637	N/A.

6.3 List of Those Authorised To Notify Relevant Authorities under Section 148 of POEO Act

Name	Position	Mobile No. (1st point of contact)	Landline 2nd point of contact
Greg Blackie	Director Engineering	0419 249 357	02 6029 8588
Thomas Plunkett	Manager Water and Sewer	0427 480 915	02 6029 8588

7.0 Communication with Neighbours and Local Community

Figure 2 Location of Walla Walla STP and Proximity to Residences on Page 18

Shows the location of surrounding and adjacent residents and their proximity to the Sewage Treatment Plant (*nearest properties are identified by a house symbol*).

The procedure for providing early warnings and regular updates to the owners and occupiers of premises which may be affected by an incident is:

STEP 1:

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours.

STEP 2:

The first step in contacting neighbours is to telephone or doorknock any area that may be impacted by an incident. In the case of a plant failure, the impacted area would include all downstream users of the water source.

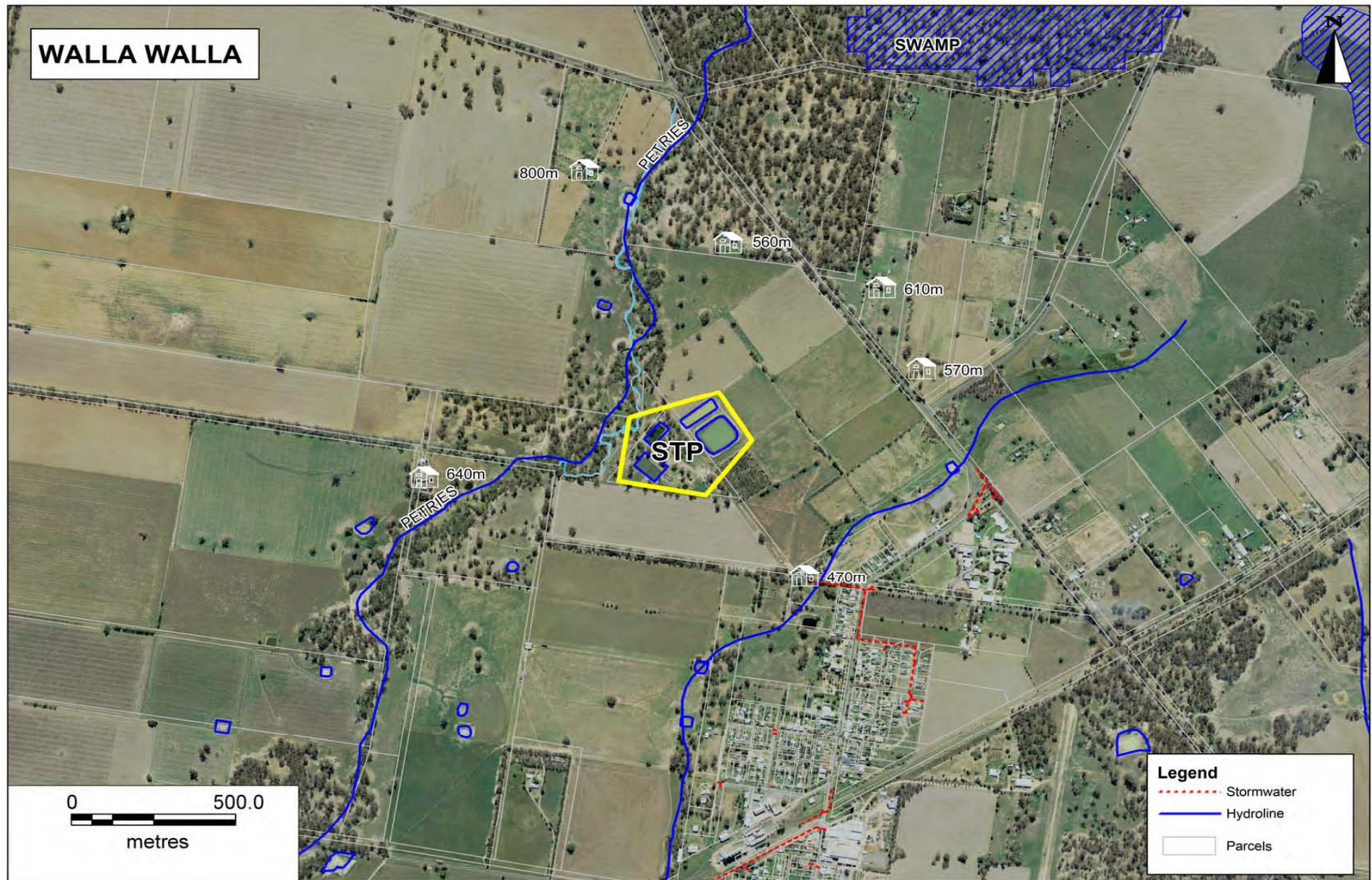
In the case of an odour issue, the affected area would include all adjacent and surrounding properties.

STEP 3:

If wider communication is required with the local community, this will be achieved through local radio stations (ACE Radio 2AY, Star FM The River, ABC Goulburn Murray) and Council's website (www.greaterhume.nsw.gov.au).

Location of the Walla Walla STP and proximity to residents is shown in Figure 2 on page 18.

Figure 2: Location of Walla Walla STP and Proximity to Residences



8.0 Arrangements to Minimise Risk of Harm to Persons on the Premises Should an Incident Occur

In the event of a pollution incident occurring, all site contractors and other Council staff will be mustered by Council site staff to the Emergency Assembly Point adjacent to the site entrance, after which they will be safely evacuated from site where appropriate. It is a condition of entry that in the event of an emergency, both site contractors and staff must adhere to directions given by the Site Supervisor.

Figure 3: Photos of Signage to Warn the Public of Hazards



9.0 Actions to be Taken During or Immediately After a Pollution Incident, Including Early Warnings, Updates and Actions to be Undertaken by the Media

Actions to be taken during or immediately after a pollution incident include:

- I. Isolate the source of pollution, wherever possible.
- II. In the event of an overflow situation, effluent can be diverted directly from the inlet works to the Effluent Reuse Storage Dam and/or the Wetlands. The effluent would be highly diluted, thereby minimising risks.
- III. Notify the manager Water and Sewer.
- IV. Continue to isolate the pollution wherever possible.
- V. Notify the relevant Statutory Authorities listed under Section 6.2 above.
- VI. Communicate with affected neighbours and the community, as required, in accordance with Section 7 above.
- VII. Implement remedial action, as appropriate and as required by the EPA.
- VIII. Complete and submit Incident Reporting Form (as included in Appendix B).

10.0 Staff Training

All Walla Walla STP operators are skilled and fully trained.

Qualifications are all current and staff training records are maintained by Council's Human Resources Officer and are available in the corporate data base.

All existing Walla Walla STP staff will be required to read and to sign to the effect that they have read and understood this PIRMP.

New members of Walla Walla STP staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All Walla Walla STP staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner.

In particular:

- staff must be capable of using the fire-fighting equipment;
- staff must be capable of identifying potential pollution incidents; and
- staff must be familiar with the requirements and procedures contained within this PIRMP.

Staff competency will be monitored through audits, public complaints and pollution incident reports.

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to familiarise site personnel with the requirements of this management plan. A register of staff training can be found in Appendix D which must be kept on site and updated regularly.

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

11.0 Making Plans Available

A copy of the PIRMP will be available at the Walla Walla STP and will be available on Council's website:

www.greaterhume.nsw.gov.au/councilservices/watersewerage/tabid/128/default.aspx



12.0 Testing Plans Once Every 12 Months

The PIRMP is a living document required to be reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received, the old version will be replaced in its entirety. A register for updating and testing the PIRMP can be found in Appendix C and must be kept on site and updated regularly.

Copies of the revised PIRMP will be distributed to all relevant staff.

Testing of the PIRMP will be implemented by Council, involving a desktop test of the plan involving all Walla Walla STP staff.

13.0 Appendices

13.1 Appendix A: Risk Assessment Matrix

Risk Assessment and Management - Methodology

Risk Assessment has been carried out using the following Framework and Matrix

Table 1: Determination of Risk Likelihood

Rating	Descriptor	Description
1	Rare	The event may occur only in exceptional circumstances – for example 1 in 100 years or greater.
2	Unlikely	The event could occur at some time but is not usually experienced – for example 1 in 30 years.
3	Possible	The event might occur at some time over a 4-10 year period.
4	Likely	The event will probably occur at least once every 1-3 years.
5	Almost Certain	The event is expected to occur in most circumstances or at least once a year.

Table 2: Determination of Risk Consequence

Rating	Classification	Operations		Stakeholders		Environment
		Health and Safety	Operations	Service Delivery	Stakeholder and Legal	Environmental impact
1	Insignificant	No injuries (includes minor scratches and abrasions and bruises) or impact on public health.	Consequences are dealt with by routine operations, corrective action.	Negligible impact on service delivery.	Stakeholder indifference. No legal significance.	Insignificant impact on the environment (no lasting effect, limited damage to minimum area of low significance).
2	Minor	Minor injuries requiring first aid or public health impacts.	Consequences could threaten the efficiency or effectiveness of some aspects of operations. No loss of production or services.	Minor corrective action required to restore service delivery for local customers.	Stakeholder aware of issue. Minor legal and non-compliance issues remedied by prompt attention.	Minimal impact on environment (contained on site and or minor short/medium term damage to small area of small significance).
3	Moderate	Medical treatment required (workforce) or minor public health impact.	Consequences would lead to a review and changed ways of operating. Significant loss of production or service.	Service restored after major intervention but within performance indicator levels.	Stakeholder actively expressing dissatisfaction Moderate breach of policy or regulation leading to low level investigation or penalties.	Off-site environmental impacts or community interest in impacts. Moderate short/medium term widespread impacts.
4	Major	Extensive injuries, sickness or alarm for public health.	Consequences would lead to a significant review and changed ways of operating. Serious loss of production or services.	Service delivery interrupted failing performance indicators. Could be recurring in nature.	Stakeholder alarm or grave concern. Serious breach of policy or regulation and exposure to court imposed penalties.	Environmental damage with legal action likely. Serious widespread medium/long term impacts.
5	Catastrophic	Major injury or death of worker or public.	Consequences would result in a significant review and changed ways of operating. Major loss of production or services.	Major failure to service delivery and considerable time to restore. Could be ongoing in nature.	Enraged stakeholder or external intervention ordered by government. Serious litigation with prosecution and serious penalties.	Extreme environmental event with prosecution certain. Very serious long term effects on a significant environment.

Table 3: Determination of Overall Inherent Risk Rating Using Risk Matrix

Likelihood	Consequence				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Almost Certain 5	High	High	Extreme	Extreme	Extreme
Likely 4	Medium	High	High	Extreme	Extreme
Possible 3	Low	Medium	High	High	Extreme
Unlikely 2	Low	Low	Medium	High	High
Rare 1	Low	Low	Low	Medium	High

1	Low
2	Low
3	Low
4	Low
5	Medium
6	High
7	High
8	Extreme
9	Extreme
10	Extreme

13.2 Appendix B: Pollution Incident Reporting Form

Pollution Incident Reporting Form

Incident No:		Time:	
---------------------	--	--------------	--

Date:		Duration of Incident:	
--------------	--	------------------------------	--

Nature of Incident:

Weather Conditions:

The Location of the Place Where Pollution is Occurring or is Likely to Occur:

The Nature, the Estimated Quantity or Volume and the Concentration of any Pollutants Involved (if known):

The Circumstances in Which the Incident Occurred, Including the Cause of the Incident (if known):

Pollution Incident Reporting Form

The Corrective Action Taken or Proposed to be Taken to Deal with the Incident and Any Resulting Pollution or Threatened Pollution (if known):

Has Council Been Notified?	Yes	No
Has Environment Protection Authority (EPA) Been Notified	Yes	No
Has NSW Ministry of Health (via Public Health Units) Been Notified?	Yes	No
Has WorkCover NSW Been Notified?	Yes	No
Has Local Fire and Rescue NSW Been Notified?	Yes	No
Has EPA Directed Council to Notify Neighbours?	Yes	No
If Not, Has Council Voluntarily Notified Neighbours?	Yes	No

Signature.....

Date.....

Site supervisor, Greater Hume Shire Council

Signature.....

Date.....

Water operations Engineer, Greater Hume Shire Council

13.4 Appendix C: PIRMP Testing and Update Register

PIRMP Testing and Update Register				
Date	Routine testing	Routine Update	Post incident Updates	New Copies Distributed to:
29/10/2013	Completed	N/A	N/A	N/A
30/10/2014	Completed	N/A	N/A	N/A
11/05/2015	Completed	N/A	N/A	N/A
18/07/2016	Completed	N/A	N/A	N/A
4/01/2017	N/A	Yes. Update key Council staff contacts	N/A	To key Council staff & premises
17/01/2017	Completed	N/A	N/A	N/A
14/08/2017	Completed	N/A	N/A	N/A

13.6 Appendix E: Site Plan

