

WEDDIN SHIRE COUNCIL

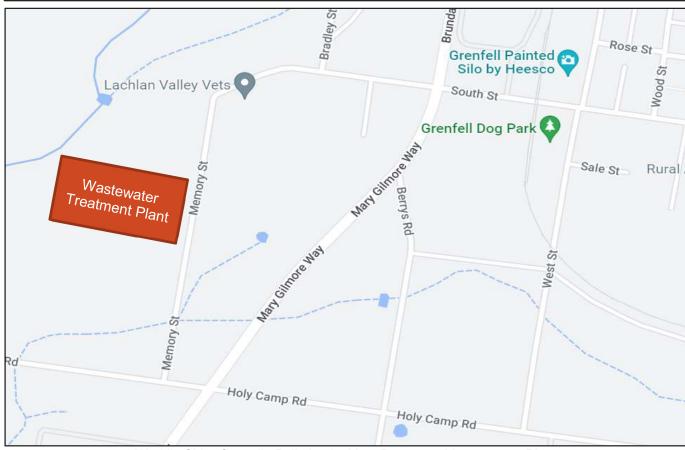
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

GRENFELL WASTEWATER
TREATMENT PLANT

8 September 2022

Grenfell Wastewater Treatment Plant





Weddin Shire Council - Pollution Incident Response Management Plan

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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN **LICENCE NUMBER: 001732**

Approved by: Linda Woods

Signature:

Lgwoods

Position/Title: Acting Director - Infrastructure

Services

Date: 8/09/2022

DOCUMENT CONTROL

1. Current Document

Version	Details	Endorsement Date
Version 1	Initial Issue	20 July 2022
version 2	After Overflow Reporting	8/9/2022
	to EPA on 30/8/22	

2. Next Review

Review	Details	Review Date
Next Review	As Required	
8/9/22	Overflow reporting to EPA on 30/8/22 due to rain event on 29/8/22 and partial PTAPS pump failure.	8/9/2022

1. BACKGROUND

Grenfell Wastewater Treatment Plant

Grenfell's Wastewater Treatment Plant (WTP) was commissioned in January 2022, replacing the original facility built in the 1930's. The new plant operates on a process of intermittently decanted extended aeration (IDEA) with UV disinfection. Flows through this plant currently average approximately 0.58 ML per day. The capacity of the plant is 2,000 EP. Effluent from this plant is able to be reused or discharged directly to the environment under licence from the EPA.

2. PURPOSE

Weddin Shire Council holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Weddin Shire Council - Wastewater Treatment Plant, Memory Street, Grenfell.

As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan is kept at the licensed premises and can be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan is also kept on a publicly accessible Council website. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

The licensed property operates under the following Environment Protection Licences (EPL):

EPL 001732 - Grenfell Sewage Treatment Plant

The EPL is issued under Section 55 of the *Protection of the Environment Operations Act 1997* by the NSW Office of Environment and Heritage (OEH). The EPLs contain requirements to report pollution incidents as outlined in condition R2:

Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

- R2.1 Notifications must be made by telephoning the Environment Line service on 13 15 55.
- R2.2 The licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

The introduction of the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) in February 2012 requires that holders of EPLs maintain a Pollution Incident Response Management Plan **(PIRMP)**.

3. ENVIRONMENT PROTECTION LICENCE (EPL) DETAILS

Name of licensee: Weddin Shire Council - ABN: 73 819 323 291 24

(including ABN)

EPL number: 001732

Premises name and address: Weddin Shire Council - Wastewater Treatment Plant

Memory Street, Grenfell

Company or business contact details: Name: Linda Woods

Position or title: Acting Director - Infrastructure

Services

Business hours contact number/s: (02) 6343 1212

After hours contact number/s: 0490859547

Email: mail@weddin.nsw.gov.au

Website address: www.weddin.nsw.gov.au

Scheduled activity/activities on EPL: Sewage treatment

Fee-based activity/activities on EPL: Sewage treatment processing by small plants

4. POLLUTION INCIDENT - PERSON/S RESPONSIBLE

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

PIRMP activation: Name of person responsible: Linda Woods

Position or title: Acting Director - Infrastructure

Services

Business hours contact number/s: (02) 6343 1212

After hours contact number/s: 0490859547

Email: linda@weddin.nsw.gov.au

5. POLLUTION INCIDENT - PERSON/S RESPONSIBLE, CONTINUED

Notification should be made by a person with an appropriate level of authority

Notifying relevant authorities:

within the company.

Name of person responsible: Linda Woods
Position or title: Acting Director - Infrastructure

Services

Business hours contact number/s: (02) 6343 1212

After hours contact number/s: 0490859547

Email: linda@weddin.nsw.gov.au

Managing response to pollution incident;

Name of person responsible: Linda Woods

Position or title: Acting Director - Infrastructure

Services

Business hours contact number/s: (02) 6343 1212

After hours contact number/s: 0490859547

Email: linda@weddin.nsw.gov.au

Name of second person responsible: Wassim

Wassef

Position or title: Water & Wastewater Engineer -

Infrastructure Services

Business Hours contact number: (02) 6343 1212

After hours contact number: 0455502295

Responsibilities

In the event of an immediate notification incident responsibilities for incident management are as follows:

- On Call WTP Officer is responsible for actioning response to the incident.
- Water & Wastewater Engineer (or designated officer) is responsible for notifying external authorities, potentially affected community and ensuring adequate resources are available for incident response.
- General Manager is responsible for liaising with the media.

The Water & Wastewater Engineer (or designated officer) shall determine the most appropriate means of contacting potentially affected community including:

- Door knocking
- Letterbox drops
- Phone
- Local media
- Signage

Information provided to the community would depend on the incident but could include:

- Description of the incident
- Status of incident
- Response actions
- Actions to minimise harm
- Likely duration

As per the EPL's, the licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

6. NOTIFICATION OF RELEVANT AUTHORITIES

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment. Relevant authorities include:

Note: The local Council and Public Health Unit will vary depending on the location of the pollution incident.

Fire & Rescue NSW Grenfell Rural Fire Service	Contact numbers: Contact number/s:	000 (02) 6343 1054
EPA	Contact number/s:	13 15 55
NSW Health Bathurst GW PHU (Greater Western)	Relevant Area Health Service: Contact number/s:	(02) 6339 5601
SafeWork NSW	Contact number/s:	13 10 50

Note: POEO Act Definitions of a Pollution Incident A pollution incident is defined by the POEO Act as:

An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises but it does not include an incident or set of circumstances involving only the emission of any noise.

Material harm is defined by the POEO Act as:

For the purposes of this Part:

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, it does not matter that harm to the environment is caused onlyin the premises where the pollution incident occurs.

7. NOTIFICATION OF NEIGHBOURS AND THE LOCAL COMMUNITY

Identified owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

1). Occupier of 13 Memory St, Grenfell, NSW

Contact by: Door knocking

2). Occupier of 15 Memory St, Grenfell, NSW

Contact by: Door Knocking / Phone

3). Occupier of 17Memory St, Grenfell, NSW

Contact by: Door knocking

4). Occupier of 36 Memory St, Grenfell NSW

Contact by: Door knocking / Phone

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified. 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.

Impacts on the community due to sewage distribution and treatment incidents are variable and depend on location, volumes of spills or other factors. Relevant communication methods will be used on a case by case basis and in all situations, Weddin Shire Council will attempt to provide early warning to directly affected premises (either upstream or downstream depending on tidal impacts where relevant) by phone call or site visit. Early warning is to include details of what the incident is, how those affected can prepare and respond, and provide important advice such as avoiding contact and use of affected waterways. Where early warning is not possible, Weddin Shire Council will provide notification and communication during and after an incident to advise those affected with information, advice and updates. Notification and communication methods will be determined on a case by case basis and the following methods may be used:

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

In the event of a sewage spill into stormwater or waterway, Weddin Shire Council 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 until contamination has cleared. contaminated land is to be disinfected, ponded sewage pumped out and faecal coliforms are to be monitored until background levels are reached. 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). Weddin Shire Council is to take signs down and advise the public that regular activities can be resumed by (as required):

- Phone calls
- Media releases (radio/newspaper/internet)
- Letter drops
- Other methods as the situation requires

8. DESCRIPTION AND LIKELIHOOD OF HAZARDS

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

The potential hazards to human health and the environment include:

- Sewage overflow (raw or partially treated) potentially caused by:
 - Storms (lightning/heavy rainfall/wind) causing power failure or infrastructure damage
 - Reticulation blockages impacting on sewer network
 - o Damage to reticulation (contractors or other damage during excavations, etc)
 - Infrastructure failure due to age
 - o SCADA/Communications failure, eg stop receiving (SMS) alerts from wetwell
 - Excessive flows due to heavy rainfall
 - Mechanical breakdown
 - Power outage
 - Treatment plant blockage
- Chemical spill potentially caused by:
 - Tank/storage failure
 - Delivery incident
 - Damage to chemical reticulation
 - Vandalism
 - Inappropriate chemical use
 - Bund failure
- Hydrogen Sulphide Gas Exposure
 - Confined space entry
 - Faulty equipment
 - Incorrect work practices

For details of the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood (see attached Appendix 1: Risk Assessment and Actions)

9. PRE-EMPTIVE ACTIONS TO BE TAKEN

Descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

Physical and preventative measures

Physical barriers (such as screening) are installed to prevent pollutants from entering the WTP. At Grenfell WTP, treatment process bypass is installed to prevent partially treated sewage spills due to overflow issues. Grenfell WTP has one wet well (SMS) alert system to alert the Wastewater

Treatment Plant Operator and the Director – Infrastructure Services of condition that the wet well reach 63% level.

Power failures can occur at any time and can be planned or unplanned interruptions. Essential Energy will notify the Works Supervisor (or designated officer) the power failure which will last for above two hours, and then the Wastewater Treatment Plant Operator will be notified by the Works Supervisor (or designated officer). When the WTP experiences a power failure lasting for two (2) hours or above, Wastewater Treatment Plant Operator will monitor the automatic change over generator kept on the premises.

Any manhole can overflow/surcharge due to a sewer choke at any time, this may cause a minor or major overflow/surcharge into the stormwater system. Sewers may also surcharge due to a blockage in the downstream pipes or lack of capacity especially in wet weather events. Council staff will attend the sewer chokes and contain the overflow and treat the pollutants.

Other pre-emptive actions to prevent, minimise and manage any pollution incidents at the treatment plant include:

- Carrying out preventative maintenance schedules on both the WTP and the wastewater network system
- Ensure spill Kits available onsite and chemical areas are bunded
- Site security

10.INVENTORY OF POLLUTANTS

Details of inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Location/Tank	Max. quantity	Contents	Comments
Aluminium Chlorohydrate - Bunded area opposite control room.	8,000L	Aluminium Chlorohydrate	Classified as Hazardous
Sodium Hypochlorite- Bunded area opposite control room.	3,000L	Sodium Hypochlorite	Classified as Hazardous
Unleaded Petrol - in storage shed	20L	Unleaded Petrol	Classified as Hazardous
Glyphosate - in Storage shed	20L	Phosphonomethyle	Classified as Hazardous

11. SAFETY EQUIPMENT

Safety equipment / other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

Personal Protective Equipment

This section lists the standard PPE items required.

Sewage Treatment Plant

The following items are to be kept at Grenfell WTP:

- Ear/hearing protection
- Gas monitor
- Sun screen
- Disposal overalls
- Rubber gloves
- Goggles
- Gumboots
- Steel capped boots

Sewerage Choke Removal

The following items are to be kept on the vehicle:

- Goggles/eye protection
- Hearing protection
- Disposable overalls
- Rubber gloves
- Gumboots

Other safety equipment to minimise the risk to the environment includes:

- Bunding kit for dangerous goods
- Spillage control kit
- Firefighting equipment
- Safety data sheets

12. COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

Weddin Shire Council will attempt to provide early warning to directly affected premises. Depending on the severity of the incident and the likelihood of impact on the community, a range of communications methods can be deployed during and after an incident. These include:

- Site visits/door knocking
- Phone calls
- SMS messages
- Emails (external and internal)
- Social media, website updates
- Media alerts
- Letter drop
- Warning signs
- Depending on the incident; WaterNSW has an early warning system to alert Water Licence Holders. WaterNSW can be contacted and request made for them to send an alert

Depending on the nature of the incident, Weddin Shire Council will liaise with NSW Health and DPIE to ensure best advice is given to the community. The advice will be given to the community either by phone call, email, SMS messages if individuals are directly affected; or by media alerts and social media post for advice to the general community. The community will be regularly updated by the same mediums as the situation evolves.

Depending on the incidents, specific warning signs may be erected near incident sites or near affected areas.

13. MINIMISING HARM TO PERSONS ON THE PREMISES

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- Ensure an emergency plan & chart are displayed in its site office detailing steps required in the case of an emergency and the location of its emergency evacuation point.
- Operators are trained and qualified to undertake the work
- Operators in training are actively supervised by qualified operators
- Contractors have completed induction and site induction/risk assessment
- Visitors are to sign in and out and visitors are accompanied by Weddin Shire Council staff
- PPE is supplied and kept in good condition
- Implement monitoring and preventative maintenance to reduce the potential for incidents at both the WTP and for the reticulation mains.

Details on regular operational/maintenance activities is provided below:

Activity	Frequency	
Wastewater Treatment Plant		
Operate the WTP as per operation and maintenance procedures	Daily	
Check wetwell pump via SMS alert	When cleaning with filling above 63% in wetwell	
Visual check of pumping operations of wetwell and balance tank pumps	Daily	
Clean pump areas	Daily (Wetwell)	
Service pumps	Annually/As required	
Electrical inspections of pump controls	As required	
Pump refurbishments	Determined by service reports	
Pump replacements/upgrades	Determined by service reports	
Calibrate gas monitor	Annually	
Reticulation		
CCTV inspections of mains	As per inspection program	
Mains rehabilitations	As per renewal program	

14. MAPS

A detailed set of maps (attached in appendix 2) showing the:

- location of the premises to which the licence relates
- location of any stormwater drains on the premises

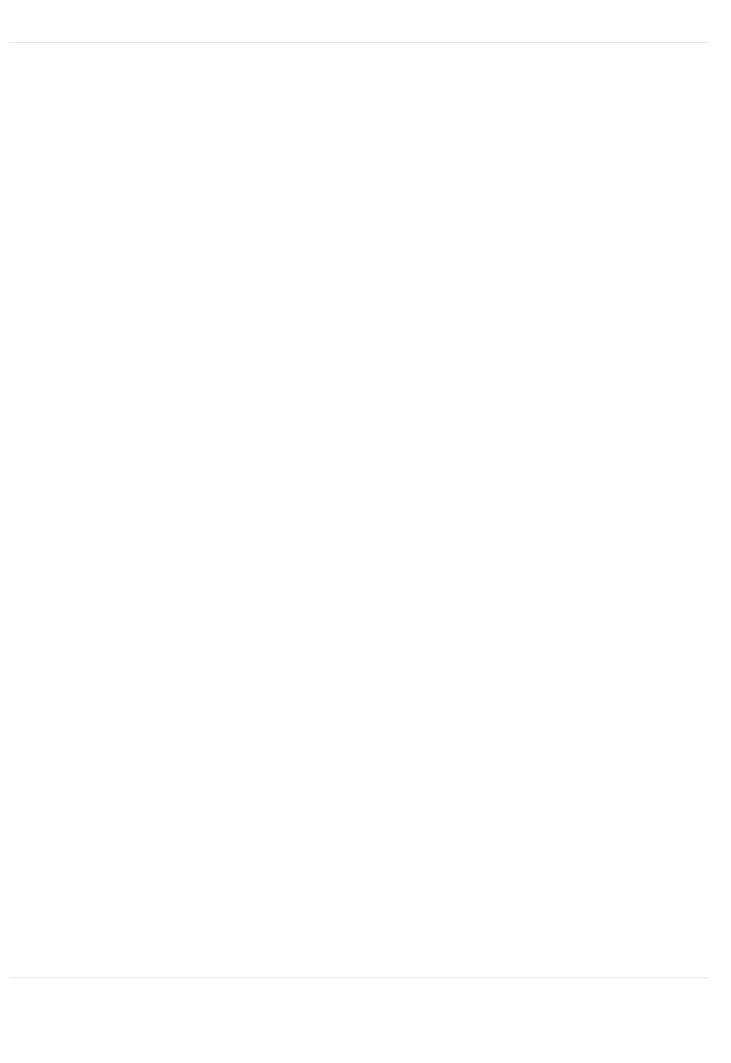
15. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

- 1. Assess and declare the incident based on the potential for it to escalate. Initial assessment looks at impact on
 - Customers
 - Community
 - Environment
 - Public Health
 - Safety
- 2. Notify the regulatory authorities:
 - NSW EPA Pollution Line, 13 15 55
 - NSW Health Water Unit
 - SafeWork NSW, 13 10 50
 - Fire & Rescue NSW
 - Other authorities depending on impact of material harm.
- Appoint Incident &/or Emergency Controller
 - Establish the Incident &/or Emergency Management team
 - Review initial situation analysis
 - Commence Incident Log and issue current situation report (can be verbally).
- 4. Manage the incident
 - Gather information
 - Conduct regular briefings for the Emergency Management Team and key stakeholders
 - Implement relevant plans and procedures
 - Implement communications protocols
 - Issue regular update reports (can be verbal) to relevant internal and external stakeholders
 - Review and monitor effectiveness of response
 - Maintain event records
- 5. Record the incident
 - Collate all event records
 - Debrief incident in accordance with business rules
 - Commence incident investigation
 - Update risk registers

Proposed action is detailed on flow chart below:





Initial Call Management

Pollution incident is identified either by the public or by Water and Sewer Operator.

If there is immediate threat to human health or properties, call triple zero (000) and follow emergency evacuation protocol as required.

Operator to advise supervisor immediately and **start isolating the site** to prevent un-authorised entry. If possible, contain the incident and prevent it from spreading without endangering staff and/or public. Remain upwind if incident involves smoke or fumes.

Operator and Supervisor will assess if the incident poses a risk of material harm to the environment as defined in section 147 of the POEO Act. Flowchart 2 can help with the assessment. Material Harm is defined as:

- i) involving actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- ii) resulting 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 the 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.

If the incident is identified as **NOT** posing a risk of material harm, contain the incident, clean up the area and prepare a minor (Near Miss) incident report (Appendix). In this instance, the PIRMP does not need to be activated.

If the incident is identified as **posing a risk** of material harm, Supervisor to advise Water and Sewer Process Coordinator and/or Manager Water and Sewer. The PIRMP must be **activated immediately**.

The following agencies MUST to be contacted as soon as possible:

- EPA on 13 15 55
- NSW Health Office

In case of major incident (potential or actual harm to human and the environment AND/OR assistance is required with clean-up from other agencies), the following agencies MUST ALSO be contacted as soon as possible:

- SafeWork NSW 13 10 50
- Grenfell Rural Fire Service (02) 6343 1054

Further authorities may need to be contacted as required see page 4 (notification of authorities, continued).

Incident Management

Engineering Director, to immediately appoint an Incident Controller. This staff member will be in charge of managing all aspects of the response to the incident.

Incident controller, with the help of internal and external technical advisors (DPIE, external contractors), is to devise the course of action to be taken to contain, repair and clean up the affected area. Incident Controller will also allocate resources (staff, equipment etc) required to be able to deal with the incident in a timely manner.

Incident Controller to contact Communication Team and Customer Services to advise of incident and request assistance with communication to the community as required. Incident Controller to organise contacting Stakeholders as required. The Incident Controller will regularly review the need for communications updates.

In the event of a chemical or sewage spill, Weddin Shire Council staff will go to prominent and/or high use areas, erect signage and advise users. The signs are to warn users of the contamination and advise them to avoid using the area until contamination has cleared.

Incident Controller to organise sampling as required and to advise.

Incident Controller to remind all staff involved in the incident to keep a timeline and record all actions taken during the incident.

Post Incident

Incident Controller is satisfied that the incident is under control, repairs have been done and clean up completed.

EPA and other agencies to be notified of incident completed as required.

Incident Controller to ensure that investigations into the incident, including root cause analysis, are done and report to EPA produced within seven (7) days.

16.STAFF TRAINING

Weddin Shire Council will implement the Pollution Incident Response Management Plan by training or providing information to relevant employees and contractors in relevant areas of the Plan. The nature and objectives of staff training is to relate to site personnel the importance of early notification of any incidents and spills to site supervisors and key personnel.

Training or information will be provided on the following:

- The contents and intent of this PIRMP,
- The roles and responsibilities of site staff in relation to this PIRMP
- Spill response procedures;
- General environmental awareness; and / or Hazardous materials awareness

All staff required to implement this plan and associated documents must have training in its use and be inducted into it. This is to ensure they are aware of the content, processes and requirements of this plan and can competently implement it if necessary. In the event of a significant incident, an investigation and debrief will be conducted, documentation updated (if required) and staff will be re-inducted. All incidents are to be registered into Council's filing system and training records will be kept.

The training exercise will involve all Water and Sewer staff who could potentially be involved in an actual incident.

A realistic scenario will be presented to staff who will need to highlight all steps that will be taken to:

- Activate the PIRMP
- Contain the incident
- Report the incident

- Advise the community (if scenario requires)
- Clean up and close the incident

17. TESTING AND UPDATING OF THE PIRMP

It is a legal requirement to test the plan every twelve (12) months and within one (1) month of any pollution incident.

Key site personnel and supervisors to participate in PIRMP tests which are used as practical training and can also be used to identify any potential gaps or areas for improvement for the PIRMP. A summary of the PIRMP test/drills undertaken at Weddin Shire Council is shown below.

Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing):

Testing of this plan is to be carried out to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.

There are two types of testing:

- Planned testing the plan is to be tested routinely at least once every calendar year and will be completed in conjunction with a review of the PIRMP document.
- Post-incident testing assessed as part of the debrief process.

Detail the dates on which the plan was updated: 15 July 2022

PIRMP Testing Details

Date tested 18/7/2022	Tested by Todd Osborne; Asher J. Woodrow ; Wassim Wassef; Evan Spalding Todd Osborne; Asher J	Details of test Desk top test; SCADA failure (involved: Evan Spalding from Alliance Automation [mailto:EvanS@allian ceautomation.com.au Desk Top test: Sodium Hypochlorite spillage	The SCADA system is currently configured to continue operating the plant on failure of the SCADA system. Issue is the SCADA server is a single point of failure of the system. It is recommended that standby SCADA server be on site. However, the SCADA server has currently 3 years on site next business day warranty. Sodium Hypochlorite is stored in a tank which is fully bunded. In case of tank	Next scheduled testing date (Planned to be within 12 months from current test):before July 2023
	Woodrow ; wassim Wassef	spillage.	bunded. In case of tank emptying, the bund has adequate capacity to contain the spill and no liquid can	

escape from the bund into the environment. Communication protocol for the notification of relevant authorities and notification of neighbours were implemented including evacuation of all personnel in the plant to go upwind of the spill to minimise harm to persons on the premises.

PIRMP Update Details

Date update occurred 20/07/22	Reason for update New WWTP	Details of updates New PIRMP	Plan is uploaded to website on 20/7/2022	Date of completion 20/07/22
8/9/2022	Overflow Incident reported to EPA on 30/8/22	Desk top and Field test of SCADA system to ensure pump operation with reduction in flow.	Overflow due to partial pump failure caused by partial blockage. Flow into the PTAPS can cause partial blockage of the duty/standby pumps resulting in reduction of pump flow rate without an alarm. This could cause potential overflow, especially in wet weather events. Reprograming of SCADA to ensure pump change over at low flow. Also drop level in PTAPS well when wet weather forecast.	

APPENDICES

Appendix 1 Risk assessments and Actions

No	Risk	Impact	Likeliho od	Controls
Sew	er Reticulation Mains		_ 	
1	Sewage overflow due to inflow/infiltration	Land contamination, possibly enter a waterway	UF = 5	>Reticulation maintenance and rehabilitation to reduce infiltrate and inflows >Monitoring and maintenance
2	Sewage overflow due to storm damaging infrastructure	Land contamination, possibly enter a waterway	VUF = 6	>Lightning protection >Site vegetation management to prevent damage to infrastructure >portable pumps > Pre-emptive measures
3	Sewage overflow due to reticulation blockages or damage	Land contamination, possibly enter a waterway	UF = 5	>Reticulation maintenance >High pressure cleaning of mains for repeat chokes >Monitoring and maintenance
4	Sewage overflow due to an external persons excavation hitting the sewers	Land contamination, possibly enter a waterway	UF = 5	>Provide underground service locations to external persons >Vacuum trucks (for clean-up) >Portable pumps (for clean-up)
5	Sewage overflow due to infrastructure failure (e.g. due to age)	Land contamination, possibly enter a waterway	VUF = 6	>Maintenance and renewal programmes
Sew	age Treatment Plant			
1	Sewage overflow (raw) due to heavy rainfall	Land contamination, possibly enter a waterway	VUF = 6	>Reticulation maintenance to reduce infiltration and inflows >overflow storage - bunded area >Bypass systems to overflow storage pond >Monitoring and maintenance
2	Sewage overflow (raw) due to reticulation blockages	Land contamination, possibly enter a waterway	VUF = 6	>Reticulation maintenance to reduce infiltration and inflows >Bypass systems to overflow to discharge point >Monitoring and maintenance
3	Sewage overflow (raw)	Land	UF = 5	>Locate services prior to excavations
	due to damage to	contamination,		>Appropriate supervision of contractors
	onsite reticulation (e.g. During excavations, etc.)	possibly enter a waterway		>Bypass systems
4	Sewer overflow due to Wetwell communication failure	Land contamination, possibly enter a waterway	UF = 5	>Testing and alarming >Monitoring of signal issues
5	Sewage overflow (raw) due to excessive flows	Land contamination, possibly enter a waterway	VUF = 6	>Reticulation maintenance to reduce infiltration and inflows >Bypass systems to overflow to discharge point >Monitoring and maintenance
6	Sewage overflow (raw) due to treatment plant blockage	Land contamination, possibly enter a waterway	VUF = 6	>Bypass systems

7	Chemical Spillage	Personal injury	LF=4	Bunded area for all chemicals, Trained operators and PPE worn.

Risk Assessment Matrix

	Likelihood - How likely is it to happen and How often?			
Consequences - How bad is it likely to be?	Very Likely could happen at any time VL	Likely could happen sometime L	Unlikely could happen, but rare U	Very Unlikely could happen, but probably never will VU
Extreme - Kill or cause permanent disability or ill health K	1	1	2	3
Major - Long term illness or serious injury S	1	2	3	4
Moderate - Medical attention and several days off work M	2	3	4	5
Minor - First aid needed F	3	4	5	6

(Adapted from RMS resources)

1 = top priority: do something immediately

6 = low priority: do something when possible

Appendix 2 Detailed	Maps of WTP	Including Site Drainage
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