



November 2024

PIRMP

Pollution Incident Report Management Plan

Cowra Sewage Treatment Plant (STP)

EPL 3648

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Document History

Review History

| Rev No | Author | Reviewer | Approved for Issue | |
|--------|-------------|-------------------|--------------------|------------|
| | | | Approver | Date |
| 0 | D. Scott | G. Metcalfe | G. Metcalfe | 16/01/2013 |
| 1 | D. Scott | G. Metcalfe | G. Metcalfe | 27/03/2013 |
| 2 | D. Scott | K. Keliher | P. Ford | 06/11/2014 |
| 3 | D.Scott | K.Keliher | P .Ford | 22/07/2015 |
| 4 | S.Hayes | K.Keliher | P.Ford | 26/05/2016 |
| 5 | S.Hayes | K.Keliher | P.Ford | 19/05/2017 |
| 6 | S.Hayes | K.Keliher | P.Ford | 22/02/2018 |
| 7 | S.Hayes | P . Gregg | P.Ford | 15/01/2019 |
| 8 | S.Hayes | P. Ford | P.Ford | 2/10/2019 |
| 9 | S.Hayes | P. Ford | P.Ford | 9/9/2020 |
| 10 | S.Hayes | P. Ford | P.Ford | 27/9/2020 |
| 11 | S.Hayes | P. Ford | P.Ford | 27/9/2021 |
| 12 | G. Williams | M. Tedeschi | M. Tedeschi | 26/09/2022 |
| | | P. Ford | | |
| 13 | G Williams | P Ford P Gregg | J Chinomona | 09/11/2023 |
| 14 | G Williams | P Ford P Gregg | J Chinomona | 22/11/2024 |

PIRMP Testing and Update Register

| Date | Routine Testing | Routine Update | Copies Distributed |
|------------|--|-----------------------------------|--------------------|
| 06/11/2014 | | Update 2014 | Y |
| 18/08/2015 | Test – 2015 | | |
| 26/05/2016 | | Update 2016 | Y |
| 04/10/2017 | | Update 2017 | |
| 02/10/2019 | Test – 2019 | Updates 2019 | Y |
| 09/09/2020 | | Updates 2020 | Y |
| 27/09/2021 | Test 2021 | | |
| 29/09/2021 | | Update 2021 | Y |
| 20/09/2021 | Tested revised PIRMP prior to approval | Updated | Y |
| Sept 2022 | | Updated | Yes |
| 21/11/2024 | | Desktop revision with Plant Team. | |

1. Background

1.1 Water and Sewer Operations

1.1.1 Cowra Sewerage Treatment Plant (STP)

Cowra's Sewage Treatment Plant (STP) was commissioned in 2011, replacing the original facility built in the 1930s. The new plant operates on a process of intermittently decanted extended aeration (IDEA) with UV disinfection. Flows through this plant currently average approximately 2ML per day. The capacity of the plant is 14,800 EP. Effluent from this plant is able to be reused or discharged directly to the Lachlan River under licence from the NSW Environmental Protection Authority (EPA).

1.2 PIRMP Purpose

The licensed properties operate under the following Environment Protection Licences (EPL):

- EPL 3648 Cowra Sewage Treatment Plant

These EPLs are issued under Section 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) 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 POEO Act.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

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).

The PIRMP is held by the Infrastructure and Operations Directorate and is applicable to Council's sewerage operations at the Cowra STP. Council maintains separate PIRMPs for saleyards, landfill, water treatment and sewage operations.

2. Pollution Incident Response Planning

2.1 Risk Assessment

The main hazards which were identified for the licensed facilities are detailed in Table 1 along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks.

Table 1 - Hazards

| Location | Hazard | Control Measure/s | Consequence | Likelihood of material harm | Escalating Factors |
|----------|---|--|-----------------------------------|-----------------------------|--------------------|
| STP | Insufficient sewage treatment – overflow of STP | New STP with storage designed to manage inflows up to a 1 in 100 year rainfall event. Any overflow throughout the plant is pumped back to the beginning of the treatment process. Lagoon height logged weekly to maintain freeboard. STP connected to SCADA with alarms to STP Manager. Training of STP operators | Pollution of downstream waterbody | Low | Nil |

2.2 Potential Pollutants and Safety Equipment

Details of potential pollutants and safety equipment are provided in Table 2.

Table 2 - Inventory of Pollutants and Safety Equipment

| Potential Pollutant | Location | Maximum Quantity | Safety Equipment & Devices | Alarms |
|---------------------|----------|--------------------|--|--------|
| Caustic | STP | nil | Fire fighting equipment Glasses, safety boots and high vis vests Goggles and gloves Respirators | SCADA |
| Actizime M120S | | 1000L | | |
| Alphos | | 23,000L | | |
| Sewage | | 2ML/day (Variable) | | |
| Zetag | | 1000L | | |

2.3 Maps

Pollution incident response maps have been prepared to facilitate planning for incident response and provide readily accessible and accurate information to support the assessment of an incident and assist in the implementation of incident response procedures and clean up.

The following maps are provided within the enclosed Appendices:

- Cowra Locality Map;
- Features Map (Cowra STP)

2.4 Notifiable Incidents

2.4.1 POEO Act Definitions

The following definitions are provided in accordance with the POEO Act:

**Pollution
incident**
(Dictionary)

means 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.

(1) For the purposes of this Part—

(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

**Material
Harm**
(s. 147(1))

(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 only in the premises where the pollution incident occurs.

3. Incident Response

3.1 Immediate Notification Incident

3.1.1 Incident Response and Notification

As per the definition of an immediate notification incident in Section 2.4.1 and resulting from the risk assessment in Table 1, Council have identified the following incident related to their, sewer operations that requires immediate notification:

Council's procedures for responding to an immediate notification incident are outlined Image 1.

All internal and external contacts to be notified in the event of an incident are provided in Tables 3-4.

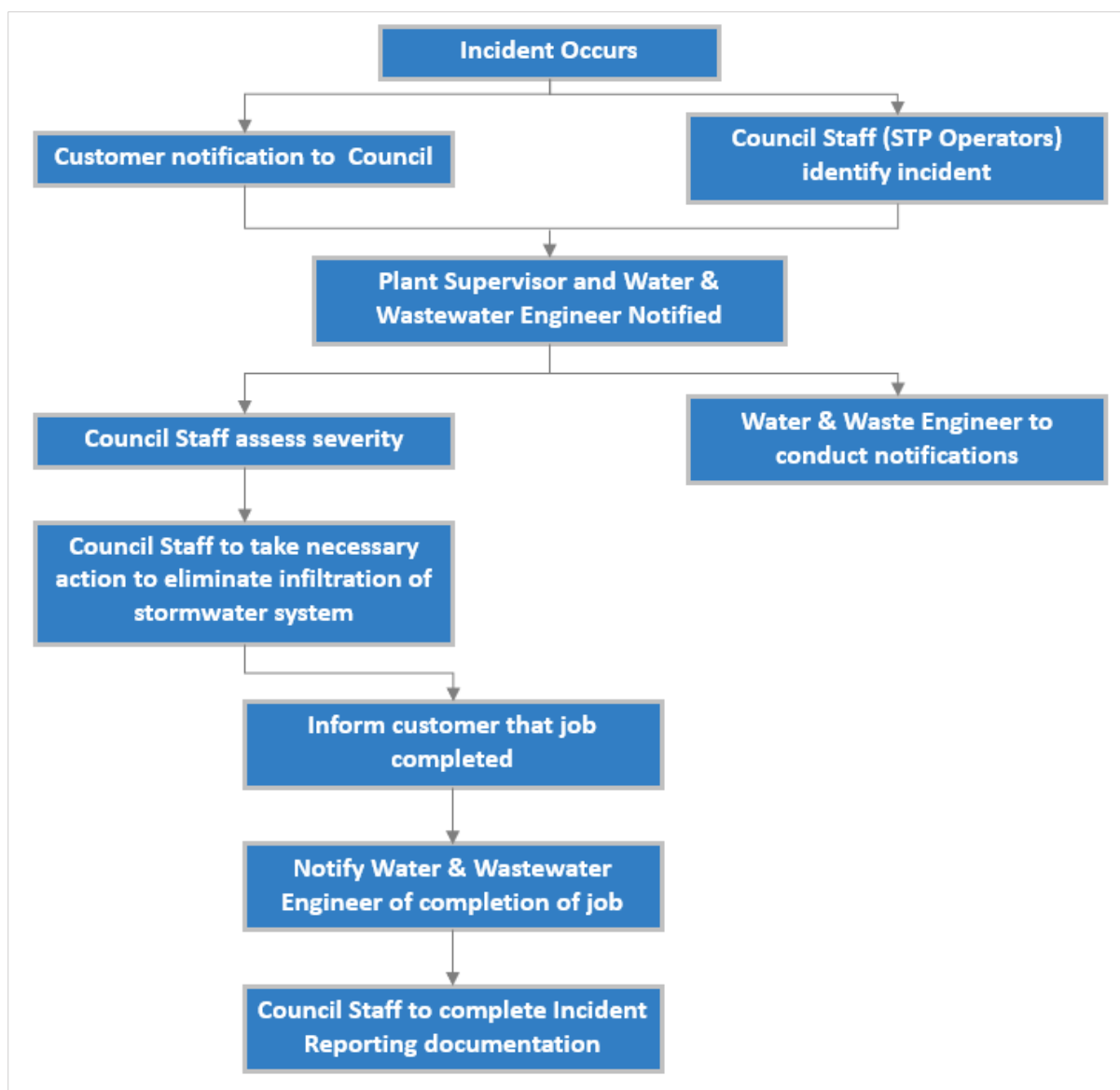


Image 1 - Incident Response Notification Process

Table 3 - Incident Contact Details (Internal)

| Name | Role | Contact Number |
|--------------------------------------|--|---------------------------|
| Peter Ford | Water & Wastewater Engineer | 6340 2104 0428 863 084 |
| Johnathan Chinomona | Manager - Cowra Works | 6340 2080 0427 083 843 |
| Paul Gregg | Plant Supervisor | 6340 2160 0428 674 238 |
| Dirk Wymer | Director Infrastructure and Operations | 0418 457 401 |
| Paul Devery | General Manager | 6340 2013 |
| Council Emergency/Afterhours Contact | | 6340 2000 0419 219 231 |
| Council Enquires and Complaints | | 6340 2000 |

Table 4 - Incident Contact Details (External)

| Organisation | Contact Number |
|---|---------------------------|
| Emergency Services (Police, Ambulance, Fire & Rescue*) | 000 |
| EPA Bathurst Regional Office | 131 555 6333 3800 |
| NSW Public Health On Call Public Health Officer Bathurst Regional Office | 0428 400 526 6339 5601 |
| SafeWork NSW | 131 050 |
| Fire & Rescue NSW* (Cowra) | 1300 729 579 |
| Rural Fire Service (Cowra) | 6363 6666 |
| NSW Department of Planning Industry and Environment Bathurst | 0428 443 790 |

3.1.2 Responsibilities

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

- On-Call STP Officer is responsible for actioning response to the incident.
- Water & Wastewater Engineer 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 shall determine the most appropriate means of contacting potentially affected community including:

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

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 EPLs, the licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

3.1.3 Notification of External Authorities

EPL 3648 requires details of sewage incidents be recorded. Where sewage or partially treated sewage is discharged from the premises as a result of a bypass of the sewage treatment plant, or an observed or reported overflow has occurred from the reticulation system, and overflow or a bypass may pose a risk to public health, the licensee is to promptly give appropriate notification to any parties that are likely to be affected, including:

- the potentially affected community;
- the NSW Health; and
- other parties as appropriate.

When the licensee notifies the NSW Health of a bypass or overflow incident, the licensee must also notify the EPA. Notifications are to be given as soon as practicable after the licensee or one of the licensee's employees or agents becomes aware of the incident, and must include all relevant information including the information required under the EPL.

4. Training and Review

4.1 Training

Personnel involved in sewer operations undertake a range of training to assist in the response to potential incidents and to test the adequacy of incident response procedures and plans.

Details of the PIRMP training and testing requirements is outlined in Table 5.

Table 5 - PIRMP Training

| Type of Training | Personnel Involved | Frequency | Records |
|---|--|--|--------------------|
| NSW Office of Water Part 1 – Waste Water Treatment Operations | STP Operators | Once | Human Resources |
| NSW Office of Water Part 2 – Advanced Treatment | STP Operators | Once | Human Resources |
| NSW Office of Water Waste Water Update Seminar | STP Operators | Tri- annually | Human Resources |
| Water Quality Analysis | WTP and STP Operators | On-the- job/DPI training | Human Resources |
| Confined Space | WTP, STP and Reticulation Operators | As required by training provider | Human Resources |
| Toolbox Meetings | Site staff | Daily | Minutes |
| Overflow Clean Up | All Sewer Staff | On-the-job | Nil |
| Site Induction | New Staff | Once | Records |
| Emergency Simulation | All Water/ Sewer Staff | Annual | Minutes |

4.2 PIRMP Review

The PIRMP will be reviewed when there is a material change to operations including but not limited to:

- Modification of EPL 3648;
- Changes in standard operating procedures referred to in this PIRMP;
- Change in legislative requirements; and
- Recommendations arising from an incident debrief, emergency drill or emergency simulation exercise.

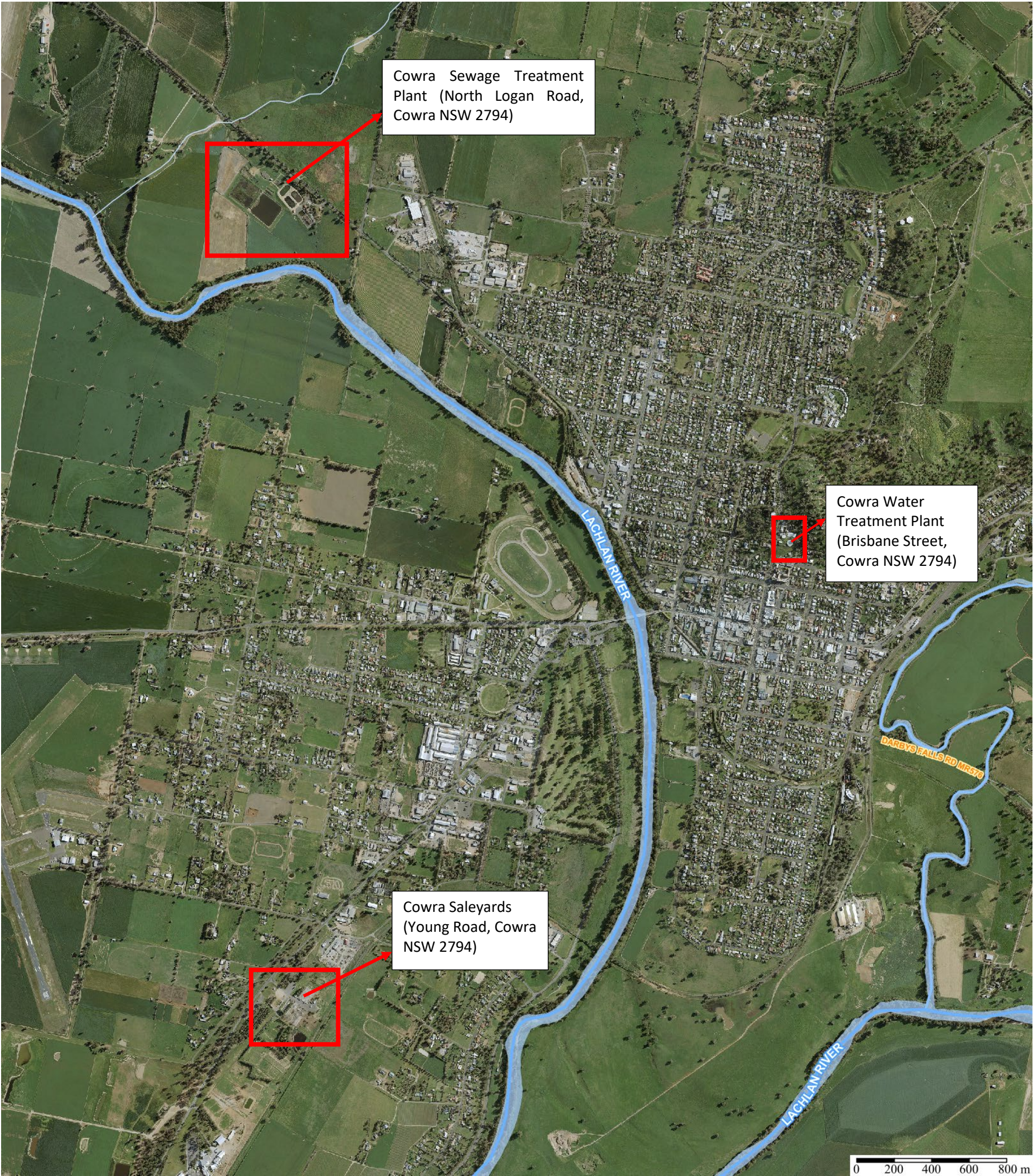
The responsibility for reviewing the PIRMP is the Manager Cowra Works.

An update of the PIRMP would trigger all staff to undergo refresher training as part of the relevant weekly toolbox meeting as per Table 5.

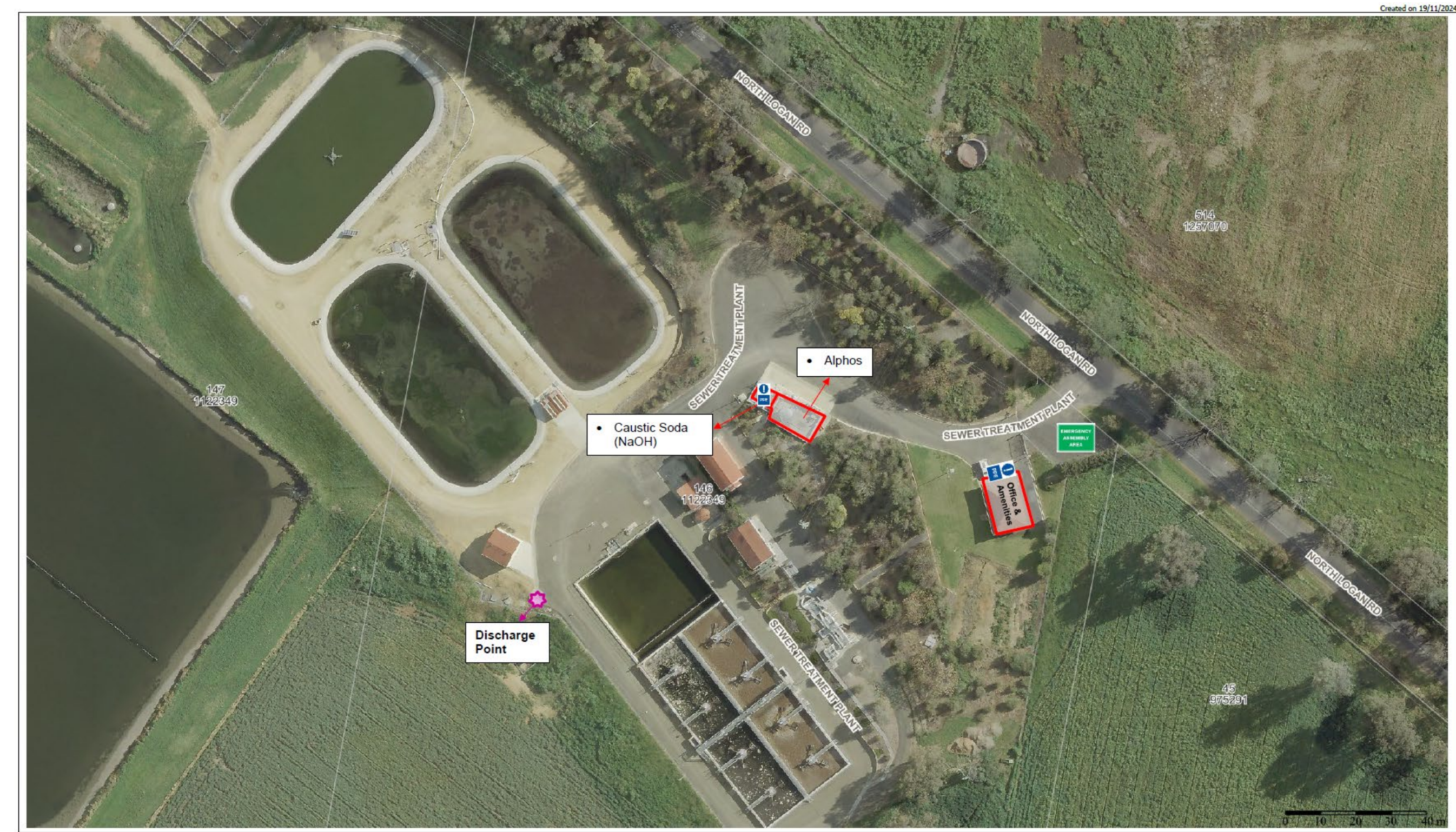
Schedule of Appendices


| Appendix Reference | Description | Page |
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| D | Memorandum to Staff (Summary of PIRMP Changes Cowra STP) | 14 |
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Appendix A (Map Overview of Sites – Cowra Layout)




Appendix B – Cowra STP Site Overview





Cowra Council
Private Bag 342
116 Kendal Street
COWRA NSW 2794
Ph: (02) 6340 2000
Web: www.cowracouncil.com.au

Important Notice!
This map is not a precise survey document. Accurate locations can only be determined by a survey on the ground.
This information has been prepared for Council's internal purposes and for no other purpose. No statement is made about the accuracy or suitability of the information for use for any purpose (whether the purpose has been notified to Council or not). While every care is taken to ensure the accuracy of this data, neither the Cowra Council nor the SS makes any representations or warranties about its accuracy, reliability, completeness or suitability for any particular purpose and disclaims all responsibility and all liability (including without limitation, liability in negligence) for all expenses, losses, damages (including indirect or consequential damage) and costs which you might incur as a result of the data being inaccurate or incomplete in any way and for any reason.
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Projection: # GDA2020 / MGA zone 55

Date: 19/11/2024

Drawn By: Grace Williams

Map Scale: 1:1000 at A3

Appendix C – PIRMP/Pollution Incident Report Form



Pollution Incident Management Plan

Sewage Treatment Plant

PIRMP / POLLUTION INCIDENT REPORTING FORM

INCIDENT NO: _____

DATE: _____

TIME: _____

DURATION OF INCIDENT: _____

NATURE OF INCIDENT: _____

TEMPERATURE: _____

WIND DIRECTION & SPEED: _____

RELATIVE HUMIDITY: _____

RAINFALL SINCE 9AM: _____

FIRE DANGER RATING: _____

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):

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

Name: _____

Position: _____

Signature: _____ Date: _____

Name: _____

Position: _____

Signature: _____ Date: _____

Appendix D – Memorandum to Staff (Update of PIRMP)

Memorandum



Cowra Shire Council
Private Bag 342
Cowra NSW 2794

Phone: 02 6340 2000
Fax: 02 6340 2011
council@cowra.nsw.gov.au
www.cowraregion.com.au

From: Water & Waste Water Engineer

Department: Operations and
Infrastructure

Date: 22/11/2024

Re: Summary of changes made to PIRMP – Cowra Sewage Treatment Plant

| | | | | |
|---------------------------------|-------------------------------------|---|---|---|
| <input type="checkbox"/> Urgent | <input type="checkbox"/> For Review | <input type="checkbox"/> Please Comment | <input checked="" type="checkbox"/> For Information | <input type="checkbox"/> Please Recycle |
|---------------------------------|-------------------------------------|---|---|---|

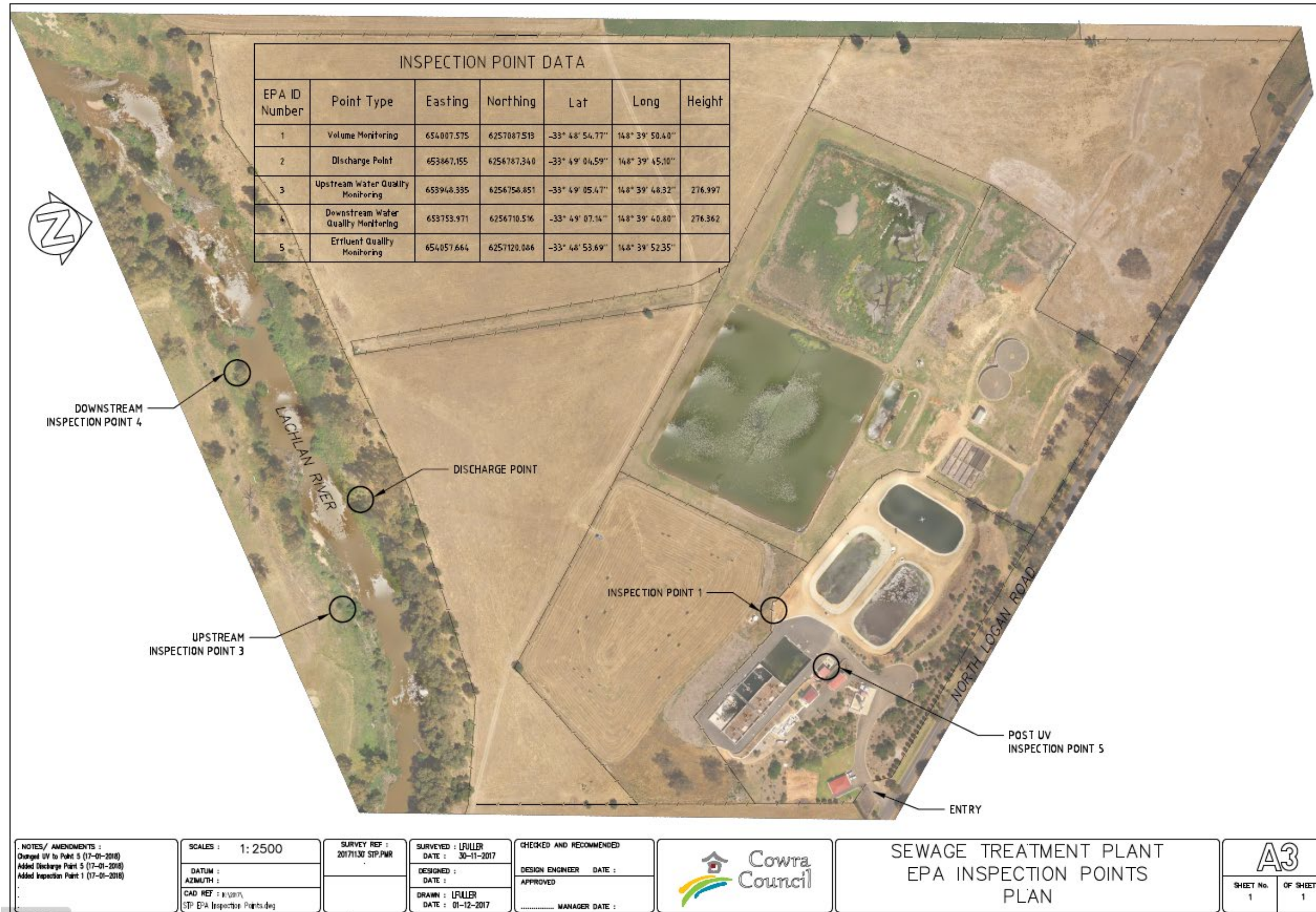
With regards to the changes made to this PIRMP document to meet the EPA compliance requirements for EPL 3648 changes are as follows:

- General administrative changes/updates to the PIRMP;
- Revision of Appendix B – Cowra STP Site Overview.

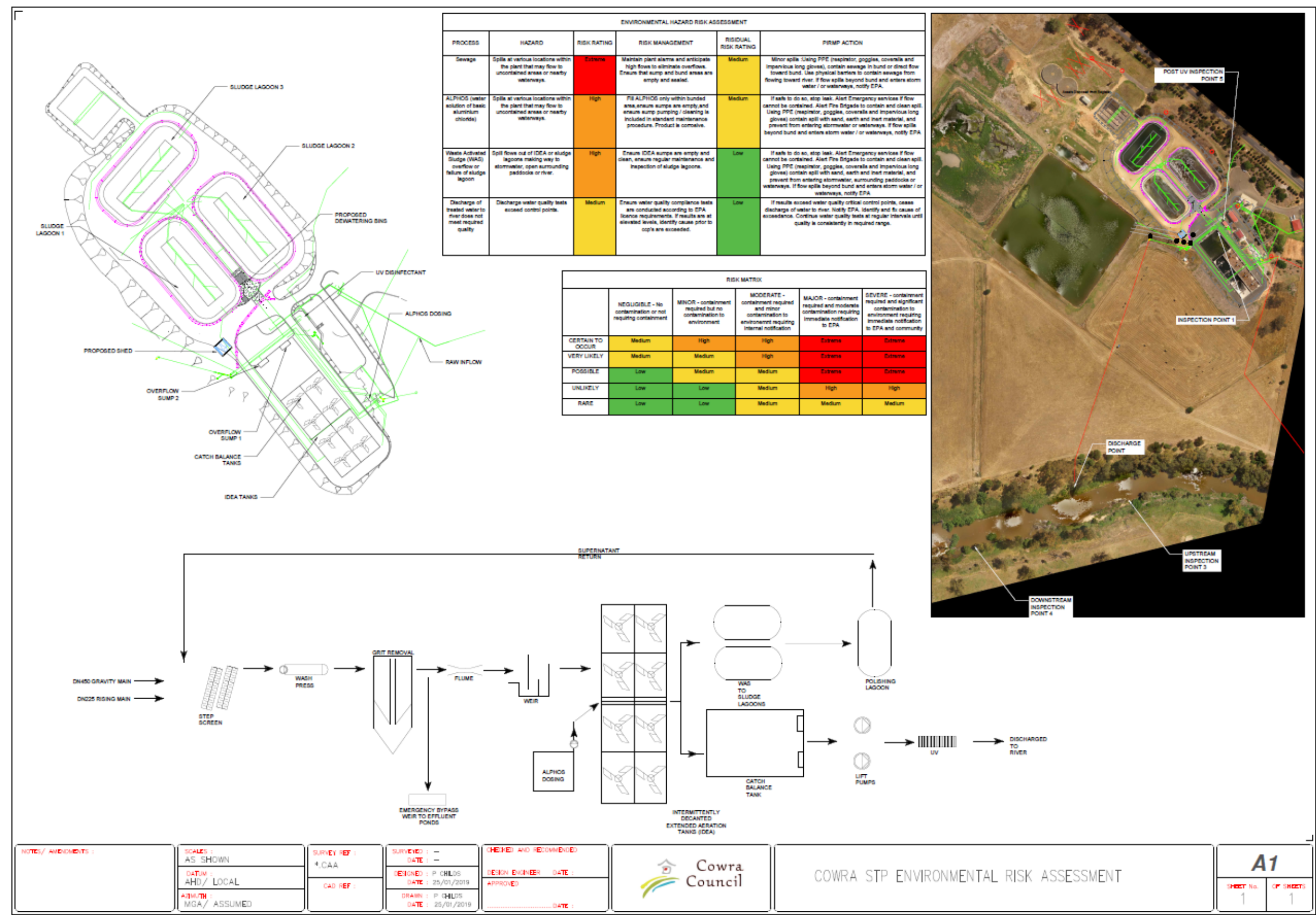
Jonathan Chinomona
(Manager Cowra Works)

Prepared by: Grace Williams (Project Manager - Cowra Works)

Appendix E - EPL 3648 – Cowra STP Inspection Points



Appendix F – Cowra STP Process Overview



NOTES/ AMENDMENTS :

SCALES : AS SHOWN
DATE : AHD/ LOCAL
AUTH : MGA/ ASSUMED

SURVEY REF : 4_CAA
CAD REF :

SURVEYED : -
DATE : -
DESIGNED : P. CHLOS
DATE : 25/01/2019
DRAWN : P. CHLOS
DATE : 25/01/2019

HEHEI AND RECOMMENDED
DESIGN ENGINEER :
DATE :
APPROVED
DATE :

Cowra Council

COWRA STP ENVIRONMENTAL RISK ASSESSMENT

A1

SHEET No. 1 OF SHEETS 1

