



HOLIDAY & RECREATION PARK

Pollution Incident Response Management Plan for Sewerage Settlement Ponds EPA Licence No. 4471

PREPARED BY:

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Introduction

The objective of this plan is to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
- 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.

Legislative requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation).² In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).

Definition of 'pollution incident'

The definition of a pollution incident is:

- pollution incident 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.

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.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

'Immediately' has its ordinary dictionary meaning of promptly and without delay.

These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

There are new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.

Description and likelihood of hazards

The main hazard to human health or the environment associated with the sewerage settlement ponds (SSP) and pump station at Wyangala Waters is a spill or overflow of effluent.

The likelihood of an effluent spill at Wyangala Waters is considered low, however there are circumstances or events that would increase the likelihood of a spill occurring.

These include a peak visitation overloading the ponds, the failure of containment levees or significant rain events during peak visitation periods and a failure of the sewerage pumps.

Given the size of the SSP and management operations at Wyangala Waters, other potential hazards are limited, as no chemicals or waste materials (apart from effluent) are stored at the site.

There are no sensitive environments near the site such as a densely populated area, school, hospital or water body that would increase the risk of environmental or health impacts of a pollution incident. Additionally, there are no facilities near the site which handle dangerous or explosive materials which could be impacted by a pollution event.

Pre-emptive actions to be taken

Pre-emptive actions which have been, and continue to be implemented at Wyangala Waters SSP include:

- Construction and maintenance of an earth bund around the ponds to prevent stormwater entering the site, or in the event of an effluent spill within the absorption trench area, containment of the spill.
- Quarterly maintenance and annual checks of the SSP
- Installation and maintenance of public exclusion fencing and signage surrounding the SSP area and subsurface irrigation areas.
- Warning bells and lights on the pump station in case of pump failure.

Inventory of pollutants

The primary pollutant at the site is effluent. The maximum quantity of effluent that can be stored at the site is:

- 1800m³ (pond 1)
- 85m³ (pond 2)
- 180 m³ (pond 3)
- 130 m³ (pond 4)
- Approx. 96 m³ at the pump station

Safety equipment

Personal protective equipment (PPE) is located on site for staff to use, together with appropriate job safety analysis prepared for operation and maintenance of the SSP. Items available to staff include elbow length PVC gloves, eye protection, masks and training. Minimising harm to persons on the premises

In the event of a pollution incident the following procedures will be followed to minimise harm to persons on the premises:

- Maintenance of signage and exclusion fencing around the SSP and effluent disposal areas.
- The erection of temporary exclusion fencing and pollution notification signage if the pollution incident affects areas beyond the existing public exclusion areas.
- Wyangala Waters staff must notify village residents of the pollution event and exclusion requirements from the pollution area to minimise harm.

- In the event of a catastrophic pollution event involving mass effluent spillage the site may require evacuation.

Actions to be taken during or immediately after a pollution incident

In the event of a leakage from the SSP, certain options are available to ensure an environmental pollution event does not occur, or is minimised.

Options available:

1. Temporary retention of sewage at the main pump station.
2. Primary holding tank can be pumped out by a contractor and disposed of off-site. Please refer to emergency contact table at the end of document for pump-out contractors.

If the ponds fail, effluent will flow over ground along the western side of the site. The topography in the area directly adjacent to the SSP is gently sloping and naturally vegetated beyond the pond area. Given this, the potential risk of material harm to the environment is considered low. However, in the event of the ponds failing, Option 1 (temporary retention of effluent at the main pump station) and or Option 2 (emergency pump-out) should be implemented until the problem is rectified.

In the event of a pump failure, notify guests to restrict sewer use and contact pump maintenance contractor (contact details located within emergency contact list)

In the event of a significant effluent spill an emergency pump-out contractor (contact details located within emergency contact list) will be engaged to deploy spill containment equipment, clean up the spill with waste disposal tankers, remove waste from the site and dispose at an approved waste disposal facility.

Staff training

Staff involved in the management of Wyangala Waters will be trained in incident management. Training involves toolbox talks on incident management procedures in the event of a pollution threat or incident, together with simulated incident exercises. Relevant staff will be made familiar with this document and its location will be readily available. Records of training exercises will be kept on site.

Implementing plans

If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment is caused or threatened, the person carrying out the activity must immediately implement any pollution incident management response that has been developed in this document to meet the requirements of the Protection of the Environment Operations Act 1997 (POEO Act).

Relevant Authorities' Notification Order

1. EPA 13 1555
2. Cowra Shire Council 02 6340 2000
3. WorkCover 13 10 50
4. NSW Crown Holiday Park Trust 02 4967 2233

Emergency Contact List

- Polpure 0418 63 4433 (for sewerage pumpout)
- Pump maintenance Felton's Pump & Repair Specialists (02) 6341 1535 0448 075 048