

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

JOHN GILBERT WATER TREATMENT PLANT AND
RETICULATION SYSTEM

PREPARED FOR:

DUBBO REGIONAL COUNCIL

JUNE 2025

Report Title:	<i>Pollution Incident Response Management Plan</i>
Project:	<i>John Gilbert Water Treatment Plant and Reticulation System</i>
Client:	<i>Dubbo Regional Council</i>
Report Ref.:	<i>PIRMP Dubbo</i>
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Change History

Date	Details of Changes	Version
03/03/2025	Contact Details Updated	2.2
25/06/2024	Contact Details and Information Testing Session Updated	2.1
08/06/2022	Document Reviewed and Formatting Updated	2.0
16/06/2021	Document Reviewed	1.7
20/05/2020	Document Reviewed	1.6
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12/02/2019	Document Reviewed – Contact Details Updated	1.4
16/03/2018	Document updated to address EPA audit findings	1.3
29/08/2017	Document Reviewed – Dubbo Regional Council	1.2
19/05/2016	Document Reviewed – Western Plains Regional Council	1.1
20/08/2012	Original Document	1.0

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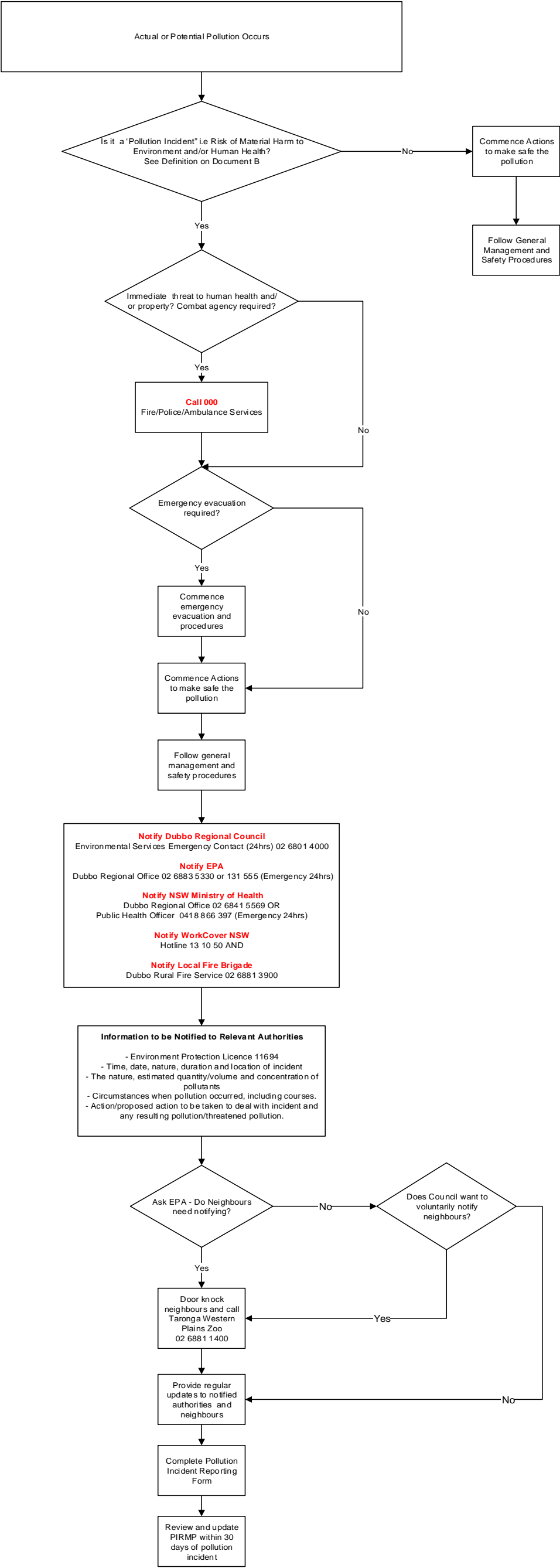
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1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table 1.1 – Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Chemical leak or spillage	Low Refer to Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010	High Refer to 'Potential Danger to Personnel' on page 2 of Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010	Human error, lack of site maintenance and/or a mechanical failure of plant and equipment. Chemical fire accelerated by high winds, dry weather, prolonged periods of high temperatures and low humidity. Refer to 'Hazards and Incidents' on page 3 of Emergency Response Plan for the John Gilbert Water Treatment Plant Chlorination System, November 2010
Rupture of process vessels	Low	Low	Lack of site maintenance and/or a mechanical failure of plant and equipment.
Failure of sludge drying pond results in discharge to environment	Low	Low	Lack of pond maintenance
Failure of backwash pond results in discharge of backwash to environment	Low	Low	Lack of pond maintenance
Malfunction of plant and machinery results in discharge to environment	Low	Low	Fire damage or poor maintenance of plant and equipment.
Acts of vandalism or target of terrorist activity at the WTP	Low	Medium	Increased risk during hours of closure. Increased fire risk during sustained periods of hot and dry weather.

2.0 DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART



3.0 DOCUMENT B – POLLUTION INCIDENT EMERGENCY CONTACT DETAILS

3.1 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.”*

3.2 NOTIFICATION OF POLLUTION INCIDENT

3.2.1 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.

3.2.2 Notification of Relevant Authorities

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:

Notification of Relevant Authorities	
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. Dubbo Regional Council	
• Dubbo Regional Council Environmental Services (24 hour Emergency Hotline Number)	02 6801 4000
3. The Environment Protection Authority (EPA)	
• Dubbo Regional Office	02 6883 5330
• Emergency Hotline Number (24 hours)	131 555
4. NSW Ministry of Health (via Public Health Units)	
• Dubbo Regional Office	02 6841 5569
• Public Health Officer on Call (24 hours)	0418 866 397
5. WorkCover NSW	
• Hotline Number	13 10 50
6. Fire and Rescue NSW	
• Dubbo Rural Fire Service	02 6881 3900**
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 follow that outlined above except for dialling 000.	

3.2.3 Information to be Notified

Under section 150 of the *POEO Act 1997*, the information about a pollution incident that must be notified to relevant authorities is:

- The time, date, nature, duration and location of the incident;
- 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 action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Other information prescribed by the regulations.

Notification is required by the Site Supervisor immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

3.2.4 EPA Powers of Direction & Notification of Neighbours

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 3.2.2**.

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.

Council would notify neighbours by 'door knocking' every neighbouring property identified on enclosed Site Plan **01A_EV02**. The only exception to this being the neighbouring property of Taronga Western Plains Zoo who would be notified by a telephone call as detailed in **Table 2.1** below. A summary of the neighbour notification procedure is provided in **Document A** – Pollution Incident Decision Flow Chart in **Appendix A**.

Table 2.1 – List of Neighbours to be Notified

Contact Name	Contact Name	Contact Name	Contact Name
General Enquiries	Taronga Western Plains Zoo Obley Road Dubbo NSW 2830	Tel: 02 6881 1400	Contact by telephone.
n/a	Various residential properties	n/a	Door Knock – see drawing 01B_EV02 for details.

3.2.5 Dubbo Regional Council Contact Details

The following Council officers are directly responsible for the overall management of the WTP and, if considered necessary, can be contacted by relevant authorities in the event of a pollution incident:

John Gilbert Water Treatment Plant

- | | |
|--|--------------|
| • Bec Eade, Manager Operations Water Supply and Sewerage | 0418 121 512 |
| • Srinie Yeepe, Water and Sewer Treatment Engineer | 0436 618 227 |
| • On Call Technician | 02 6801 4598 |

Dubbo Reticulation System

- | | |
|---|--------------|
| • Bec Eade, Manager Operations Water Supply and Sewerage | 0418 121 512 |
| • Hendrik Gouws, Water Operations Specialist Reticulation | 0436 608 918 |
| • Jason Naveau, Reticulation Coordinator – West | 0428 401 151 |

4.0 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):

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:..... Site Supervisor, Dubbo Regional Council	Date:.....
Signature:..... Manager Water Supply and Sewerage, Dubbo Regional Council	Date:.....

5.0 PIRMP TESTING & UPDATE REGISTER

Date	Routine Testing	Routine Update	Post Incident Updates	7 New Copies Distributed?

6.0 STAFF TRAINING REGISTER

Date	Staff Member	Brief Description of Training Task

Pollution Incident Response Management Plan

Of John Gilbert Water Treatment Plant.

On 19 June 2025.



Purpose:	To familiarise staff with the PIRMP procedure and to test the process.
Overview:	<p>Discussed the PIRMP and the procedures to follow in the event of a pollution incident with all staff present.</p> <p>The notification speed of the incident were discussed, as per PIRMP and Management Staff on site will make sure of SAFTY FIRST and that include to stop the overflow. Once that is done, notify the EPA of incident and the clean-up procedure /plan.</p> <p>Follow procedure of notifications as outlined in PIRMP. Make sure to complete relevant documents and submit to management for EPA report.</p>
Desk Top Testing - Scenario:	<p>A chlorine gas delivery has arrived, the truck parks and while unloading the last container the driver drops it, landing on the road and a small leak is detected from the valve. This causes the container to leak chlorine gas within the grounds of the JGWTP.</p> <p>It is a windy day (Westerly, towards the Macquarie River) and there are two contractors onsite conducting electrical works at the JGWTP.</p>

Staff's Response on Scenario:

- 1) Check windsock to determine wind direction and determine safe evacuation meeting point away from chlorine gas leak.
- 2) Staff will have contact details of contractors and tell them to move to the appropriate evacuation point as per site induction. As leak is currently moving west tell contractors to approach assembly point from the south or north.
- 3) Ensure the driver is safe.
- 4) A qualified (chlorine handling) technician should have been present in appropriate PPE including breathing apparatus. Technician to assess the severity of the leak, check tap and shut off or minimise/contain leak if possible.
- 5) If unable to contain leak call 000 and notify DRC chain of command (Water and Sewer Treatment Engineer, Manager Operations Water Supply and Sewerage)
- 6) Notify EPA, NSW Health, WorkCover NSW and Local Fire Brigade. Ask EPA if necessary to notify neighbouring properties.
- 7) Contact IXOM for advice.
- 8) Continue monitoring windsock for any direction changes.
- 9) Council incident report to be completed.
- 10) Complete EPA incident PIRMP Form and submit.

Information and Testing Session of

Pollution Incident Response Management Plan

Of John Gilbert Water Treatment Plant.

On 19 June 2025.



Comments and observations

Participants were familiarised with the PIRMP in order to respond to the pollution incident scenario presented. The discussion exercise was successful in testing the PIRMP.

Participants discussed and confirmed their roles in relation to the scenario and pollution incident response.

Attendee list attached separately.

ATTENDANCE LIST



Training/Testing:	Pollution Incident Response Management Plan - 2025
Date:	19 June 2025
Venue:	Dubbo Water Treatment Plant
Time:	10:30 PM
Provider:	DRC

Name	Position	Signature
Srinivas Yeepi	Water and Sewer Treatment Engineer	
Glenn Clifford	Water Treatment Team Leader	
Prince Chandravelil Varghese	Treatment Technician	
Jordan Killorn	Water/Wastewater Treatment Assistant	Sick Leave
Ishan Pramaraaja	Treatment Technician	
Alezier Roldan	Treatment Technician	
Salim Sazzad	Treatment Technician	
Sai Parameswaran	Water and Sewer Quality Specialist	