

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

SEWAGE RETICULATION AND TREATMENT SYSTEM MANAGEMENT

SITE: Ingenia Holidays Merry Beach

ADDRESS: 46 MERRY BEACH ROAD, KIOLOA, NSW

CONTACT: 02 4457 1065 (phone); 02 4457 1412 (fax)

ENVIRONMENTAL PROTECTION LICENSE (EPL): EPL 5888

REVISION DATE: 06 July, 2023



1. Overview

This Pollution Incident Response Management Plan (PIRMP) has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009.

The PIRMP is required to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident (i.e. unlicensed discharge of partly treated effluent or sewage) involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

Ingenia Holidays Merry Beach's sewage management system is regulated by Environmental Protection License (EPL) 5888.

A copy of this PIRMP is available on the Merry Beach Caravan Park website (<https://www.ingeniaholidays.com.au/our-parks/new-south-wales/south-coast/merry-beach/>) and a hard copy is stored in the park office.

A site plan is provided in Attachment D.

Potential pollution hazards associated with the licenced activity include:

Water pollution: Escape of significant unlicensed sewage discharge to a watercourse or waterbody. Merry Beach is approximately 270 m east from the most likely pollution discharge point (sewage treatment plant STP and an unnamed mapped watercourse is located 45 m south of the STP.

Land pollution: Escape of significant unlicensed sewage discharge to land.

Air pollution: Escape of significant odours during unlicensed sewage discharge.

Due to site management controls, practices and procedures, there is a very low risk of a potential pollution incident.

2. Emergency Response Plan

THE FOLLOWING STEPS AND CORRECTIVE ACTIONS ARE TO BE IMPLEMENTED IMMEDIATELY FOLLOWING AN EVENT CONCERNING UNLICENCED SEWAGE OR EFFLUENT DISCHARGE.

STEP	ACTION/DETAILS	RESPONSIBILITY
Report of an unlicensed sewage discharge on grounds	Report may be received via Operations Manager, Manager, reception staff, guests or members of the public.	Staff / Guests / Public
1. Advise Manager/Owners of discharge immediately.	Advise: <ol style="list-style-type: none"> 1. Maintenance Manager: Peter Young on 0404455064, or Ros Making on 0409 916 284; and 2. Owner: Ingenia – Harry Brazil, Area Manager on 0477 297 020. using <u>voice to voice contact</u> (i.e. no voice message to be left).	Park staff / Maintenance Manager
2. Note the date and time of notification, name and contact details of person notified. Include details of discharge (location, nature, time etc.).	Information to be recorded in an Incident Report Form (Attachment A) and in park diary.	Park Manager
3. Attend discharge site and assess situation.	<u>Assess the Event</u> – Where sewage or effluent discharge are of a significant volume (i.e. >100L), remain uncontrolled, or have impacted an adjacent water body the event is considered ' <u>significant</u> '.	Park Manager or Maintenance Manager

STEP	ACTION/DETAILS		RESPONSIBILITY
4. Determine the cause of discharge to refine corrective action.	Source	Likely Cause	Park Manager or Maintenance Manager
	Pump station overflow	Pump failure	
	Rising main leak	Power failure	
	STP (sewage treatment plant) overflow	Pipe failure/burst Pipe failure Filter blockage	
5. If discharge has the potential to affect waterways or public contact areas, or if the volume is considered significant, external authorities to be contacted.	Notify external authorities as appropriate (note EPL number 5888): <ul style="list-style-type: none"> • Shoalhaven City Council Environmental Health Officers – 4429 3610 • EPA Pollution Line – 131 555 • EPA Queanbeyan Office – 6229 7002 • SafeWork NSW – 131 050 (although notification is required by legislation, assistance may not be required) • Fire and Rescue – 000 • Additional contact details: NSW Rural Fire Service, Nowra - 4424 4424 Where discharge has potential to affect public health: <ul style="list-style-type: none"> • NSW Department of Health (Wollongong Public Health Unit) – 4221 6700 		Park Staff
6. Isolate the public from the contamination.	Use safety fencing and signage as appropriate.		Park Manager or Maintenance Manager
7. Arrange water quality sampling if required.	Liaise directly with external authorities and agree on a sampling program if required.		Park Manager or Maintenance Manager

STEP	ACTION/DETAILS	RESPONSIBILITY
8. Contain the discharge where possible.	Turn off any contributing upstream pump stations and monitor wet well levels. Use temporary excavations, temporary bunds, straw bales or other sediment arresting materials to contain the spill.	Park Manager or Maintenance Manager
9. Deploy staff and equipment to rectify the problem.	<ul style="list-style-type: none"> • If failure due to power failure use onsite generators to operate pumps and transfer sewage to 120 KL flow balance tank (FBT). Balance tank has capacity to contain sewage for approximately 12 hrs at peak flow. • If required contact licensed contractors to pump out sewage from STP, FBT or pump stations as required. • If roadway affected deploy suitable traffic controls and diversions. • If pump station or STP failure (and cannot be rectified) contact electrical, plumbing or mechanical technicians as required. • If rising main failure (due to blockage, rupture or otherwise) contact plumber/maintenance staff (Peter Young on 0404 455 064). 	Park Manager or Maintenance Manager or Trained Grounds Staff
10. Retrieve solids onsite.	Place all solids or contaminated clean up materials in containers or bags for appropriate disposal at landfill site.	Park Manager or Maintenance Manager
11. Disinfect the site including gutters and downstream areas.	Disinfect affected areas as appropriate. In the event of a significant spill this should be undertaken in consultation with Council's Environmental Health Officer, NSW Health and/or NSW EPA.	Park Manager or Maintenance Manager together with Environmental Health Officer (if required)
12. Determine the extent of environmental impact/pollution.	Check and document extent of contamination travel (in drains, gutters, waterways etc.).	Environmental Health Officer or delegate ¹
13. Final inspection.	Check all public health issues have been adequately addressed prior to removal of access controls and recommencement of use of any impacted areas.	Environmental Health Officer or delegate ¹

STEP	ACTION/DETAILS	RESPONSIBILITY
14. Document Incident Report.	Complete a 'Pollution Incident Report' form (see, Attachment A).	Park Manager or Owner
15. Forward the Pollution Incident Report if required.	Forward the completed Pollution Incident Report to EPA Office within 7 days. Alternative instructions may be given by EPA Environment Officer during notification and follow up.	Park Manager or Owner
16. Review cause of failure and response procedures.	<p>Review cause of failure and assess likelihood of recurrence.</p> <p>Review system or process modifications able to be made to reduce likelihood of recurrence.</p> <p>Review efficacy of PIRMP and response processes and modify as required. Staff to be trained in any revisions to PIRMP protocol.</p>	Owner, Maintenance Manager and consultant
Response to substandard toilet flushing reuse effluent quality.	In the event that reuse effluent quality declines unacceptably.	Park staff / Duty Manager
1. If 'effluent quality decline' is limited to low available chlorine at the time of testing.	<ul style="list-style-type: none"> • Shut down effluent transfer pump from STP and supplement toilet flushing supply from other sources. • Check chlorine level in reuse tank and manually dose to achieve 2 mg/L. • Manually dose chlorine well and mix by agitation. • Retest after 30 minutes. • Repeat until acceptable free chlorine levels achieved, then reactivate effluent reuse system. • Check operation of dosing pump and chlorine availability. • Retest at next decant. If issue continues, increase chlorine dosing rate and test chlorine supply. • If further issues continue rest the system for 12 hours and continue until required levels are reached. 	Park staff / Park Manager / Maintenance Manager

STEP	ACTION/DETAILS	RESPONSIBILITY
2. If 'effluent quality decline' is observed in the chlorine dosing chamber such as reduced effluent clarity or excess solids	<ul style="list-style-type: none"> • Shut down effluent transfer pump from STP and supplement toilet flushing supply from other sources. • Manually dewater chlorine dosing chamber to irrigate well and wash down to remove excess sediment, etc. • Review STP performance to assess cause of out of specification effluent. • Check, clean and service filters. • Check STP sludge levels and desludge as required. • Check STP flow rates and optimise flow balance tank (FBT) operation. • Only reinstate effluent reuse to toilets once quality is acceptable. 	Park staff / Park Manager / Maintenance Manager
3. Documentation of effluent quality event	Complete a system maintenance and fault sheet (refer to Attachment C) and send to Martens & Associates for review and action planning.	Park staff / Park Manager / Maintenance Manager

Notes:

¹ Environmental Health Officer may delegate inspection requirements to Park Owner, Park Manager, Maintenance Manager or park staff at their discretion.

3. Training, Review and Testing

All staff are to be aware of this PIRMP and must be trained in its use and implementation. Staff training is to include procedures which minimise the risk of occurrence of a pollution incident. A register of PIRMP reviews and tests is to be maintained on the PIRMP Review Tracking Register (Attachment B).

This plan is to be reviewed every 12 months, with subsequent testing of the PIRMP. Testing of the PIRMP will be carried out to ensure the plan is realistic and can be implemented in a workable and effective manner. Testing of the PIRMP is generally carried out by verbal discussions and desktop simulations, supplemented by periodic practical exercise or drills.

This plan is to be reviewed in **July 2023**.

4. Inventory of Pollutants

No significant sources of pollution other than sewage and effluent are onsite and associated with the activity licenced by EPL #5888.

An inventory of chemicals kept onsite and relevant Material Safety Data Sheets are stored in the park office.

5. Safety Equipment

Personal protective equipment (PPE) is kept onsite for use by staff as required. PPE may include ear/hearing protection, goggles, rubber gloves, sun screen, apron or disposable overalls.

Materials such as straw bales or other sediment arresting materials are to be available for onsite use. Spill kits are to be kept onsite, with clear instructions attached.

6. Neighbour and Local Community Communication

Merry Beach has no immediate residential or commercial neighbours likely to be affected by a pollution incident.

In the case of an incident, warning signs for public/staff notification are available in the park office.

7. Incident Report

Refer to Attachment A for Merry Beach Caravan Park – Pollution Incident Report.

8. Maps

Refer to Attachment D for site plans including stormwater outlets, potential sewage discharge area(s).

9. Attachment A – Pollution Incident Report

Merry Beach Caravan Park – Pollution Incident Report

Is the event Minor (trivial) or Major?

<u>Minor</u> – pollution event is not significant, presents no threat to public health or risk of material harm to the environment.	
<u>Major</u> – any pollution threat or risk to public health or risk of material harm to the environment.	

Please record the following information.

Date and time of pollution incident		
Location of pollution incident		
Rainfall in the last 24 hours (mm)		
Weather conditions		
Cause of pollution incident		
Estimated quantity discharged		
Estimated duration of discharge		
Method of detection (i.e. visual, inspection, guest notification, etc.)		
Details of person who filled out this form		Date
		Position

Information regarding Major Pollution Incidents:

Please note contact details, name of person making contact and time of contact.

Park Contacts	Contacted (Y/N)	Name and Time of Contact
Park Manager: Ros Makings on 0409 916 284 and Maintenance Manager: Peter Young 0404 455 064 OR		
Owner: Ingenia – Harry Brazil, Area Manager on 0477 297 020.		

Park Manager / Owner to contact the following authorities immediately, noting [EPL 5888](#).

Authority	Contact Number	Name and Time of Contact
Shoalhaven City Council Environmental Health Officer	4429 3610	
EPA Pollution Line	131 555	
EPA Queanbeyan Office	6229 7002	
WorkCover NSW	131 050	
NSW Department of Health (Wollongong Public Health Unit)	4221 6700	
NSW Fire and Rescue	000	
NSW Rural Fire Service, Nowra	4424 4424	

If a **Major** pollution incident occurs, sampling may be required at point of discharge, and suitable points (i.e. 50 m) along affected waterway. Samples will be tested by an accredited NATA laboratory for appropriate criteria (e.g. faecal coliforms, *E. coli* etc.) using laboratory sampling jars and nitrile gloves.

Location of test samples	
Results of test samples	

Additional Information.

Possible pollutant or chemicals released into the environment	
Actions or procedures taken to rectify the problem and/or reduce the risk to human health and the environment	
Details of proposed measures to prevent reoccurrence of the pollution incident	
Name and contact number of witnesses, if required	

Signature of Merry Beach Authorised Representative

Date

Revised October 8, 2015
 Reviewed April 18, 2017
 Revised September 25, 2017
 Revised June 1, 2018
 Revised June 21, 2019
 Revised July 23, 2020
 Revised May 26, 2022
 Revised June 28, 2023

10. Attachment B – PIRMP Review Register

PIRMP Review Register				
Date	Personnel Involved	Position	Responsibility	Amendments Required
1 Sept 2015	Marty Mirtschin			
	Adrian Paine			
	Peter Young			
	Scott Binder			
28 March 2017	Dean Wallace			
	Peter Young			
	Grahame McIlwain			
	Scott Binder			
	Andrew Kinsella			
25 September 2017	Darren Wallace			
	Adrian Paine			
4 June 2018	Darren Wallace			
	Peter Young			
June 2019	David Jensen			
	Peter Young			
July 2020	Evan Davies			
	Kevin Brown			
	Peter Young			
July 2021	Emma Hettle			
	Peter Young			

July 2023	Emma Hettie			
	Peter Young			

11. Attachment C – System Maintenance and Fault Sheet – Sewage Treatment and Reuse Scheme

12. Attachment D – Site Map



KEY	
MERRY BEACH UNNAMED TRIBUTARY	
EFFLUENT IRRIGATION FIELDS	

REV	DESCRIPTION	DATE	DRAWN	DESIGNED	CHECKED	APPRVD
A	INITIAL RELEASE	20/06/2019	RK	MGD/CS	AN	AN

SCALE
0 10 20 30 40 50 60 70 80 90 100
A1 (A3) 1:1,000 (1:2,000) METRES

GRID ---
 DATUM MRL
 PROJECT MANAGER AN
 CLIENT MERRY BEACH CARAVAN PARK
 PROJECT NAME/PLANSSET TITLE MERRY BEACH CARAVAN PARK PIRMP
 MERRY BEACH CARAVAN PARK, MERRY BEACH ROAD, KIOLA, NSW
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CLIENT MERRY BEACH CARAVAN PARK
 PROJECT NAME/PLANSSET TITLE MERRY BEACH CARAVAN PARK PIRMP
 MERRY BEACH CARAVAN PARK, MERRY BEACH ROAD, KIOLA, NSW

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DRAWING TITLE				
SITE LAYOUT & IRRIGATION PLAN				
PROJECT NO.	PLANSSET NO.	RELEASE NO.	DRAWING NO.	REVISION
P1806838	PS01	R01	PS01-F200	A