

**altogether.**

**pollution incident response  
management plan.**



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## 1. introduction and purpose

This plan identifies Altogether Group's procedures and processes for the management potential and actual pollution incidents for all its schemes. It identifies how Altogether Group meets the requirements for Pollution Incident Response Management Plans (PIRMPs) under the POEO Act and the *Protection of the Environment Operations (General) Regulation 2009*.

This plan identifies how, for each of its schemes, Altogether Group:

- minimises the risk of a pollution incident occurring as a result of their activities,
- establishes and implements clear and effective notification, action and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately,
- has properly trained staff and up-to-date incident management information available to ensure the potential impact of a pollution incident is minimised.

## 2. associated plans, procedures and protocols

This plan is to be implemented in conjunction with the plans, procedures and protocols identified in the following table. Each scheme also has a scheme-specific Network Overflow Map and Local Water Centre Overflow Map to assist incident management processes.

**Table 1 Altogether level - associated plans, procedures and protocols**

Reference	Document
AG-ALL-AUS-MN-HSEQ-1415	<a href="#">Business Management Manual</a>
AG-WAT-NSW-PL-OPS-1233	<a href="#">Operations Environmental Management Plan (OEMP)</a>
AG-WAT-AUS-PL-OPS-1328	<a href="#">Sewage Management Plan (Sewage MP)</a>
AG-WAT-NSW-PL-OPS-2299	<a href="#">Recycled Water Irrigation Management Plan (RWIMP)</a>
AG-WAT-AUS-PL-OPS-1311	<a href="#">Recycled Water Quality Plan (RWQP)</a>
AG-WAT-NSW-PL-OPS-3175	<a href="#">Water Operations Safety Management Plan (WOSMP)</a>
AG-ALL-AUS-PL-INC-2301	<a href="#">Emergency Response Plan (ERP)</a>
AG-ALL-AUS-PL-INC-1266	<a href="#">Incident Management Plan (IMP)</a>
AG-WAT-NSW-PR-INC-1277	<a href="#">Incident Notification Protocol with NSW Health</a>
AG-WAT-NSW-PR-OPS-2561	<a href="#">Water Operations Incident Management, Reporting and Investigation Procedure</a>
AG-WAT-NSW-PR-OPS-2724	<a href="#">Responding to Sewage Overflows</a>
AG-WAT-NSW-PR-OPS-2669	<a href="#">Chemical Spill Response</a>
Licence number 20843	Box Hill Wastewater and Water Recycling Scheme Environment Protection Licence

## 3. hazard assessment

Relevant hazard and risk assessments including identification of controls are listed in the following table.

**Table 2 Altogether level – Hazard and risk assessments**

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENT
<p>Scheme Risk Assessment</p> <ul style="list-style-type: none"> <li>• A description of the hazards to human health or the environment associated with the activity</li> <li>• Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.</li> </ul>	<p>Scheme Risk Register (Protecht)</p>	<p>Scheme Risk Register (scheme-specific)</p>

## 4. potential pollutants

The register for chemicals including details of storage quantities is detailed in the following table.

**Table 3 Altogether level – Chemical registers**

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENT
<p>Bulk Chemical Schedule 11 Assessment</p> <ul style="list-style-type: none"> <li>• An inventory of potential pollutants on the premises or used in carrying out the relevant activity.</li> <li>• The maximum quantity of any pollutant that is likely to be stored or held at the premises.</li> </ul>	<p>Bulk Chemical Schedule 11 Assessment AG-WAT-AUS-RG-OPS-2896</p>	<ul style="list-style-type: none"> <li>• Hazardous Substances and Dangerous Goods Manifest</li> <li>• Workplace Substances Register</li> </ul>

Other potential pollutants include dust, sediment-laden water, sewage, drinking or recycled water, general solid waste and odour.

## 5. equipment and infrastructure

Equipment and infrastructure to minimise the risk to human health and the environment and to contain or control the impacts of a pollution incident at the premises are detailed within the documents listed in the following table.

**Table 4 Altogether level – pollution control equipment and infrastructure**

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENTS
<ul style="list-style-type: none"> <li>A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.</li> </ul>	Operations Environmental Management Plan (OEMP) AG-WAT-NSW-PL-OPS-1233	NR
	Responding to Sewage Overflows AG-WAT-NSW-PR-OPS-2724	
	Chemical Spill Response AG-WAT-NSW-PR-OPS-2669	

## 6. pollution incident response

Relevant requirements of *Guideline: Pollution Incident Response Management Plans (NSW EPA, March 2020)*.

- Details of the pre-emptive action to be taken to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity.
- The names, positions and 24-hr contact details of those key individuals who:
  - i) are responsible for activating the plan
  - ii) are authorized to notify relevant authorities
  - iii) are responsible for managing the response to a pollution incident.
- The contact details for each relevant authority.
- Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises.
- The arrangements for minimizing the risk of harm to any persons who are on the premises.
- A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.

*POLLUTION INCIDENT - An unplanned event that has, or has the potential to, result in damage to the environment. Eg chemical / fuel / oil spill, fire, contaminated material find (waste, asbestos), muddy water discharge to stormwater, excessive dust leaving property, excessive noise or odour, sewage spill.*

*Where an incident occurs that causes or has the potential to cause material harm to the environment (Crisis, Major Incident or Moderate Incident), the POEO Act requires you to notify 5 Agencies. Where any notifications are purely just to comply with the Act, ensure that this is made clear to the Agencies being notified (eg “your attendance is not required, we have the situation under control and if the event escalates we will contact you for assistance”). This is particularly relevant to NSW Fire and Rescue as when a call is made to 000 the nearest Fire and Rescue Team will be sent out. If it is a non emergency use the 1300 number.*

Pollution incident response actions including categorisation and notification requirements are identified in the following:

- Incident Management Plan (IMP)
- Water Operations Incident Management, Reporting and Investigation Procedure
- Incident Notification Protocol with NSW Health

For quick reference, details of agencies requiring notification are provided in the following table.

**Table 5 Altogether level – Pollution incident notification contacts**

ORGANISATION	INITIAL REPORTING REQUIREMENT	CONTACT NUMBER	FOLLOW-UP REPORTING
EPA	Verbal to environment line	131555	Email to; <a href="mailto:info@environment.nsw.gov.au">info@environment.nsw.gov.au</a> and <a href="mailto:metrowater.infrastructure@epa.nsw.gov.au">metrowater.infrastructure@epa.nsw.gov.au</a>
NSW Health	As per the <a href="#">Incident Notification Protocol with NSW Health</a>		
NSW Fire and Rescue	Emergency (response required)	000	000



ORGANISATION	INITIAL REPORTING REQUIREMENT	CONTACT NUMBER	FOLLOW-UP REPORTING
	Non Emergency	1300 729 529	1300 729 529
SafeWork NSW	Verbal by phone	131 050	131 050
Local Council	Refer to Scheme specific Stakeholder and Emergency Contact List		

## 7. neighbours

Table 6 Altogether level – location and contact details of neighbours

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENTS
<ul style="list-style-type: none"> <li>Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises</li> </ul>	<p>Location and contact details of all residents and commercial properties in the immediate vicinity of the premises are held by Altogether Group Retail. In the event of an incident requiring these properties to be contacted, the Incident Manager is to arrange via Zendesk.</p>	<p>NR</p>

## 8. map of the premises and surrounding area

Table 7 Altogether level – Maps of premises and surrounding area

RELEVANT PIRMP REQUIREMENT,	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENTS
<ul style="list-style-type: none"> <li>A detailed map showing the location of the premises to which the license relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.</li> </ul>	<p>Location and contact details of all residents and commercial properties in the immediate vicinity of the premises are held by Altogether Group Retail. In the event of an incident requiring these properties to be contacted, the Incident Manager is to arrange via Zendesk.</p>	<p>Network Overflow Maps (for Land Housing) and LWC stormwater drainage plans are maintained for each scheme and show the location of the premises, stormwater system and surrounding areas.</p> <p>High Rise Network Overflow Maps are not yet available.</p>

## 9. training

Table 8 Altogether level – Training

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENTS
<ul style="list-style-type: none"> <li>The nature and objectives of any staff training program in relation to the plan.</li> </ul>	<p>Training provisions are detailed in the following:</p> <ul style="list-style-type: none"> <li>Operations Environmental Management Plan (OEMP) (Section 3.4)</li> </ul>	<p>In addition, further training may be in place for a scheme. The link to details for which can be found in the Scheme Management Plan.</p>

## 10. testing and maintenance

Table 9 Altogether level – Testing and maintenance

RELEVANT PIRMP REQUIREMENT	GROUP LEVEL DOCUMENT REFERENCE	SCHEME SPECIFIC DOCUMENTS
<ul style="list-style-type: none"> <li>The dates on which the plan has been tested and the name of the person who carried out the test.</li> <li>The dates on which the plan is updated.</li> <li>The manner in which the plan is to be tested and maintained.</li> </ul>	<p>This plan will be tested (as per the Critical Document Review Calendar):</p> <ul style="list-style-type: none"> <li>At least every 12 months; and</li> <li>Within one month of a Crisis, Major or moderate incident occurring.</li> </ul> <p>Testing will be by assessing and reviewing the plan and making any necessary changes. Records of when the plan has been updated will be provided in the document issue record.</p>	NR

## document issue record

Revision	Date	Changes	Author	Approver
0.1	December 2020	Draft	G Thomas	
0.2	April 2021	Review by Altogether Group and changes incorporated	G Thomas	
0.3	May 2021	Further Internal Review		
1.0	5 July 2021	Document issued	G Thomas	A Killeen
2.0	27 June 2022	Annual testing and review: <ul style="list-style-type: none"> <li>• Moved this document issue record to end of document</li> <li>• Checked and updated hyperlinks and references</li> <li>• Updated reference to Scheme Risk Register which is now in Protecht</li> <li>• Changed 'Workcover' to SafeWork NSW to reflect agency changes</li> </ul>	S Loder	A Killeen
3.0	8 August 2022	Added reference to Box Hill Environmental Protection Licence 20843	S Schroeder	A Killeen
4.00	23 November 2022	Slight reformatting (brand colours etc)	E Austin	A Killeen
5.0	18 May 2023	Annual review – formatting alterations	E Mercado	S Schroeder