



Charlotte Pass Pollution Incident Response Management Plan

Charlotte Pass Snow Resort Pty Ltd

Version 2020.0 – July 2021



CHARLOTTE PASS SNOW RESORT PTY LTD POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
LICENCE NUMBER: 1591

Approved By: Angela Murdoch, General Manager
Rolf Klicker, Environmental Services Manager

Date: 17/07/21

PURPOSE:

Charlotte Pass Snow Resort Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the *Charlotte Pass Village Sewerage Treatment Plant*. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the *Protection of the Environment Operations (General) Regulation 2009*.

This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the *Protection of the Environment Operations (General) Regulation 2009*.

Environment Protection Licence (EPL) Details

Name of licensee: (including ABN)	Charlotte Pass Snow Resort Pty Ltd ABN 40 001 261 892
EPL number:	1591
Premises name and address:	Charlotte Pass Sewerage Treatment Plant Spencers Creek Road Charlotte Pass, NSW 2627
Company or business contact details	Name: Rolf Klicker Position or title: Environmental Services Manager Business hours contact number/s: 02 6457 4247 After hours contact number/s: 0459 772 335 Email: rolf.klicker@charlottepass.com.au
Website address:	http://www.charlottepass.com.au
Scheduled activity/activities on EPL:	Sewage treatment processing by small plants, > 20 - 100 ML annual maximum volume of discharge
Fee-based activity/activities on EPL:	Sewage treatment processing by small plants, > 20.00-100.00 ML annual maximum volume of discharge

Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

PIRMP activation	Name: Rolf Klicker Position or title: Environmental Services Manager Business hours contact number/s: 02 6457 4247 After hours contact number/s: 0459 772 335 Email: rolf.klicker@charlottepass.com.au
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Name: Michael Hopkins
Position: Assistant to the Environmental Services Manager
Business hours contact number/s: 02 6457 4247
After hours contact number/s: 0418 439 026
Email: didi.hopkins@charlottepass.com.au

Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

Name: Rolf Klicker
Position or title: Environmental Services Manager
Business hours contact number/s: 02 6457 4247
After hours contact number/s: 0459 772 335
Email: rolf.klicker@charlottepass.com.au

Name: Angela Murdoch
Position: General Manager
Business hours contact number/s: 02 6457 4247
After hours contact number/s: 0419 413 718
Email: amurdoch@charlottepass.com.au

Managing response to pollution incident

Name: Rolf Klicker
Position or title: Environmental Services Manager
Business hours contact number/s: 02 6457 4247
After hours contact number/s: 0459 772 335
Email: rolf.klicker@charlottepass.com.au

Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Fire & Rescue NSW / Rural Fire Service

Contact number/s:

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EPA	Contact number/s:	131 555
NSW Health	Relevant Area Health Service:	Goulburn
	Contact number/s:	02 4842 1840 02 4825 4944
SafeWork NSW	Contact number/s:	131 050
National Parks and Wildlife Service (Local Authority for Kosciuszko National Park)	Contact number/s:	02 6450 5531
Snowy Hydro	Contact number/s:	02 9278 1888

Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

- Arlberg Ski Lodge
- Burrawong Lodge
- Jerrabomberra Lodge
- Kosciuszko Alpine Club
- Knockshannoch Ski Lodge
- Pygmy Possum Lodge
- Southern Alps Ski Club
- Spencers Creek Lodge
- Snowbird Lodge
- TarGanGil Lodge

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):

During the winter months the tenants of the lodges and all staff living on premises will be notified of an incident directly affecting them. They will be directed by the Environmental Services Manager (or his on-duty equivalent) to comply with all instructions given by emergency services and other environmental agencies. The same would be applicable during summer months, although the tenancy of the village is much lower making communication faster and easier.

Communication will be by means of a door-to-door operation by the Senior Management team (General manager, Mountain Operations Manager and Environmental Services Manager).

Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

Risk assessments of the facility have concluded that in the event of a discharge or spillage of wastewater to the environment there would be insignificant consequences to public and operational staff health but could have major environmental consequences.

Event	Hazard	Likelihood	Environmental Consequence	Action Taken
Major failure of the electrical energy or electricity supply or associated cabled and equipment	Untreated or raw sewerage discharged to Spencers Creek Bog	Low/Rare	Potentially Major	Activate emergency power. Activate spill cleanup procedure
Major failure of equipment due to mechanical problems	Untreated or raw sewerage discharged to Spencers Creek Bog	Low/Rare	Potentially Major	Activate emergency power. Activate spill cleanup procedure
Major structural failure, damaged wastewater structures or underground pipes	Untreated or raw sewerage discharged to Spencers Creek Bog	Low/Rare	Potentially Major	Activate emergency power. Activate spill cleanup procedure
Massive inundation of water as a result of flooding rain and major snowmelt	Untreated or raw sewerage discharged to Spencers Creek Bog	Low/Rare	Potentially Major	Mitigate by activating wastewater allocation procedure prioritising tank-space

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

The likelihood of the above hazards are very low, but the consequences could be significant. The combination of design, construction, contingency planning and maintenance should result in a facility where overflows occur only in exceptional circumstances. (eg: a catastrophic electrical or equipment failure, massive inundation due to environmental factors such as flooding rain combined with large scale snow-melt or the unlikely event of an earthquake damage the storage tanks or concrete lagoon walls).

Even in the result of a spill over, the natural perched bog would act as a major dampener to slow the flow of wastewater before it reaches Spencers Creek. Through natural biological processes as well as prolonged exposure to UV radiation from sunlight, any or all of the waste would be most likely reduced to 'in-licence' levels before it reached the creek.

Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

All possible pre-emptive actions should be undertaken, as outlined below in the 'Actions' section below.

Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Location/Tank	Max. quantity	Contents	Comments
Settling Tanks	800 Litres	Ferric Oxide	
Settling Tanks	10 x 20kg base	Lime	
Settling Tanks		DAP	
Settling Tanks		Urea	
Settling Tanks		Blood & Bone	
Fuel Tanks		Diesel	
Concrete Bund	1,000 litres	Ferrous Chloride Solution	Dangerous Goods Code: NOHSC 10005

Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

- Sets of Breathing Apparatus - Located in the STP Plant Office.
- Confined spaces equipment, including Harnesses, lanyards, lifelines – Located in both the STP Plant Office and Resort Workshop.
- Spill Sock, 40m length – Located in both the STP Building and Resort Workshop.
- Sewer Cleaning Equipment – Located in the STP building.
- 2 x Waste Water Pumps – Located at both the STP and Resort Workshop.
- Pressure Washers – Located at the Resort Workshop.
- Portable Generators (Towable) – Located at the Resort Workshop.
- Backup Generator – Located adjacent to the Pump Well Building.
- 5 x Snow Guns – Located adjacent to the Kosciuszko Chalet Hotel.
- 2 x Snow Cats (Vehicles) – Located at the Resort Workshop.
- 1 x Crane Cat (Vehicle) – Located at the Resort Workshop.
- 3 x Spill Kits – Located at the STP, Pump Well Building and Resort Workshop.

External Resource Providers

- Simmons & Bristow (Brisbane) - Operational support, specialist engineering advice – 07 3343 3800
- Aspect Process Services Pty Ltd (Narooma) - Wastewater treatment processes advise and support – Adrian Ridgley, 0407 663 008
- Rolf Klicker (QLD) - Wastewater treatment process & specific CPSR STP treatment and mechanical operations support – 0467 238 640
- Snowfields Plumbing (Jindabyne) - Truck mounted vacuum pump 9m3 capacity, blocked drain 'jetta', excavator, skilled labour – Todd Preston, 0421 110 780
- VanGlen Services (Jindabyne) – Truck mounted vacuum pump – 02 6456 7037, 0429 809 995
- Fieldtech Industries (Jindabyne) – Truck mounted vacuum pump – Steve Fields, 02 6456 4110, 0428 409 669
- National Parks & Wildlife Service (Jindabyne) – Advice & assistance based on operational experience at Perisher Valley – Ryan Petrov, 02 6457 4444
- ALS Environmental Division Water Resources Group (Fyshwick) – Water Sampling & Reporting – 02 6202 5401

Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried out:

During the winter months the tenants of the lodges and all staff living on premises will be notified of an incident directly affecting them. They will be directed by the Environmental Services Manager (or his on-duty equivalent) to comply with all instructions given by emergency services and other environmental agencies. The same would be applicable during summer months, although the tenancy of the village is much lower making communication faster and easier.

Communication will be by means of a door-to-door operation by the Senior Management team (General manager, Mountain Operations Manager and Environmental Services Manager).

Develop any specific information that could be provided to the community, so it can minimise the risk of harm:

Information Sheets will be developed in the event of an incident occurring that provide clear, timely and relevant information to ensure the community is well informed.

Minimising harm to persons on the premises

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- All people on-site are required to follow the relevant directions and guidance of resort staff, under the ultimate supervision of the Environmental Services Manager (or his delegated representative).
- Ensure all appropriate safety measures are identified and undertaken during any site visit
- Follow all relevant Company Policies & Procedures.

Maps

Location of the Charlotte Pass Sewerage Treatment Plant



- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of any stormwater drains on the premises.

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).

Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

- Obtain detail of spill & location
- Obtain contact detail of person reporting spill
- Notify Environmental Services Manager, who in turn is to immediately contact the General Manager
- Carry out worksite risk assessment
- Assess incident/take photos to document the spill determine the cause of failure/spill
 - Electrical failure
 - Mechanical Failure
 - Blockage
 - Structural Failure
- Estimate of time to return plant to service
- Consider and attempt to mitigate (where possible) any possible environmental concerns
- Determine Extent of work to be carried out and if any hazards exist (eg: phone/power cables, gas &/or water, storm water drains, etc)
- Determine if additional resources/materials are required (eg: personnel, barricades, sandbags, sludge pump, etc)
- Conduct Work Health Safety risk assessment
- Hand out PPE if required
- Deal with any potential manual handling issues
- Review and manage relevant Traffic control issues
- Note prevailing weather and obtain 5-day Weather Forecast
- Complete appropriate paperwork (eg: Confined Space Entry Permit, traffic control plan, safe work methods statement and Environmental Control Plan)
- Carry out site induction and/or toolbox meeting for all workers involved with the incident on the site so everyone is aware of their responsibilities and what work is to be carried out

Immediate notification of all relevant authorities by the Environmental Services Manager or General Manager.

Develop 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:

In addition to the steps outlined above, the following would also be reviewed and implemented (if required):

- Confirm if minor incident that can be managed by CPSR staff and local contractors
- Confirm if major incident requires the services of an accredited emergency pollution incident management company
- Implement Traffic Control Plan and pedestrian management plan
- Implement environmental controls by placing absorption/containment barriers, sandbags between the STP and environment
- Implement sampling and testing plan

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

Minor Incident

- Engage a local contractor if required and commence pollution prevention/mitigation measures as required. Continue the process until such time as the surcharge ceases and the failure is corrected. Then commence clean up, disinfection and incident reporting procedures.

Major Incident

- In the event that local resources are unable to contain and manage the spill, maintain all reasonable attempts to use available vacuum pumps to remove waste from the pump well and drainage system and continue with spill containment and clean up until an external resource is engaged and arrives on site.

Minor and Major Incident

- At the completion of clean up and remediation works undertake a site inspection to confirm successful decontamination
- Remove all temporary works and traffic control signs
- Undertake a debriefing with all staff and contractors and provide relevant authorities (including EPA and NPWS) all required information.

Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

Senior Management are to follow relevant procedures outlined in the PIRMP and contact appropriate authorities at the first available opportunity.

Identify the person/s through whom all communications are to be made:

All communication should be directed through the General Manager in the first instance, or in their absence (or by delegated authority) the Environmental Services Manager.

Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

Annual field training and a testing of the PIRMP will be conducted with staff responsible for the management and operation of the PIRMP. Appropriate staff training, as well as testing of the PIRMP also occurs during the normal operations of CPSR's environmental risk reduction procedures, including period when staff are carrying out higher risk activities (such as fuel transfers or the sludge removal).

Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

The Plan will be tested and maintained via the conduct of an annual desktop simulation at the commencement of each snow season. This is to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner.

PIRMP testing details

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
June 2020	Damien Berkery, Environmental Services Manager	Desktop simulation, as part of Seasonal Induction training for relevant staff	Document to be updated in conjunction with Plant Operating Manual over coming months	June 2021

May 2021	Damien Berkery ESM	Desktop simulation	June 2022
July 2021	Rolf Klicker Angela Murdoch	Desktop simulation, seasonal Induction Training for Relevant Staff	June 2022

PIRMP update details

<i>Date update occurred</i>	<i>Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)</i>	<i>Details of updates (nature of changes to PIRMP)</i>	<i>Date the updated version uploaded to website (if applicable)</i>	<i>Date of completion</i>
01/12/20	Document Re-Write	Total Update and use of new document format	TBC	TBC
17/07/21	Contact Update	In resort contact – change of person	July 2021	July 2021