



# **Pollution Incident Response Management Plan Summary**

## **Prospect Water Filtration Plant**

**Environment Protection License No. 4458**

Site Location: Northern End of Cowpasture Road  
Wetherill Park NSW 2164

Phone: 02 9756 2716

## Introduction

Degrémont Pty Ltd operates under the business name, *SUEZ Water & Treatment Solutions*.

SUEZ's culture is underpinned by a vision for a workplace free of injury, illness and environmental incidents, with a goal of "No Injuries - Ever". The vision is supported by senior management's commitment to a policy of protecting people and the environment as the highest priority of all business objectives, while ensuring customer expectations are met or exceeded.

The company is committed to managing its business in an environmentally sensitive and sustainable manner and to preventing pollution for the benefit of its employees, clients and the community. Environmental impacts are considered during the company's decision making process and at all stages of service delivery. We promote an attitude of environmental care with individual responsibility for the environment and pride in our environmental performance. All managers, employees and contractors are accountable for environmental protection and made aware of their environmental responsibilities and obligations to comply with the law and SUEZ's environmental policy.

Compliance with environmental laws is seen as a minimum requirement and, where possible, we continually improve our operations to minimise or eliminate adverse environmental effects.

As such, the operation of the Prospect Water Filtration Plant (PWFP) is performed in a manner that ensures our aims and policies are met. To support our endeavour, we have implemented, maintain and continuously improve a management system that is certified to ISO 14001 to identify, monitor and control environmental risks arising from the PWFP operation. The performance of the management system is regularly reviewed and human, physical and financial resources are provided meet the aims and objectives of our policies.



## Prospect Water Filtration Plant

The Prospect Water Filtration Plant (PWFP) treats drinking water to meet quality and quantity criteria defined in a contractual agreement with the Sydney Water Corporation. It was opened in 1996 and has a capacity of 3000 ML/day, supplying up to 85% of Sydney's population. The plant was built under a 25 year Build, Own and Operate contract between the Sydney Water Corporation (SWC) and the Prospect Water Partnership (PWP); SUEZ Pty Ltd manages and operates the plant on behalf of the PWP.

The PWFP is located at Wetherill Park, approximately 35 kilometres west of Sydney's central business district. It is situated on land gazetted to SWC in an unpopulated buffer zone surrounding the Prospect Reservoir. The site covers an area of approximately 34 ha. Prospect Reservoir borders the northern boundary, while rural and industrial areas border adjacent Sydney Water land to the south.



The plant uses chemicals in the water treatment process, involving the addition of flocculants and pH adjustment chemicals prior to filtration. The filtered water is fluoridated and disinfected with chlorine and ammonia. The chemicals used for the treatment process are transported to the site in road tankers and unloaded into bulk storage containers located on the site.

## Management Systems

To support our health and safety, quality and environmental policies, SUEZ maintains and continuously improves its management system to identify, monitor and control risks arising from our operations. SUEZ uses a certified integrated management system which has been implemented across its water and wastewater operations in Australia and New Zealand. The management system used at the Prospect Water Filtration Plant (PWFP) is a mature system that is certified to the following standards:

- AS/NZS 4801:2001 and OHSAS 18001: 2007 Occupational Health and Safety Management Systems
- AS/NZS ISO 14001:2004 Environmental Management Systems – Certificate AU04/2470, certified since Sept 2000;
- AS/NZS ISO 9001:2008 Quality Management Systems – Certificate AU94/0126; certified since May 1994.



## Environment Protection License

The PWFP has an Environment Protection License (No. 4458) which is subject to administrative conditions which authorise and regulate discharges to Prospect Creek, subject to an effluent quality program. Since the plant was built there have been no breaches of the licence.

Amendments to the Protection of the Environment Operations Act 1997 (commencing 29 February 2012) require licensees to prepare, implement and test pollution incident management plans. At the PWFP, these requirements have been met via existing systems, plans and controls.

## Identification of Potential Pollution Events

SUEZ has an established system that is used to identify and assess potential pollution incidents utilising the risk assessment process. Plans and controls have been identified and established to minimise the risks and consequences of these to acceptable levels and are reviewed periodically to ensure their effectiveness.

## Risk Mitigation of Potential Pollution Events

Risk mitigation of potential pollution events takes place via engineering controls, monitoring and plans.

Engineering controls include:

- Containment of chemical spills/leaks into areas where neutralisation or off-site removal can take place;
- Equipment and systems to monitor chemical areas;
- Emergency shutdown and neutralisation systems that are automatically activated from monitoring equipment

Monitoring takes place via the plant's SCADA (Supervisory Control and Data Acquisition) system which permits monitoring and control of the operation, as well as displaying alarms. Pager hardware relays alarms generated by the SCADA system to the plant operator.

Plans describe how pollution events will be managed to minimise the effects inside and outside the site via the timely application of defined procedures by trained personnel. They have been developed in consultation with employees, emergency services and stakeholders.

## Pollution Incident Response

Pollution incident response at the PWFP is managed by the Incident Management Plan (IMP). The aim of the IMP is to control or limit any effect that an incident, including pollution or potential pollution events, may have on or off-site by describing the resources and systems in place to manage these incidents, including:

- Details of site hazards;
- The incident response and management process;
- Notification requirements;
- Incident Response Procedures (IRP's) for specific incident/emergency scenarios, such as chemical spills and fires;
- Safety equipment and emergency resources in place;
- The re-organisation and recovery process to ensure that normal operations can be resumed;
- Information, knowledge, skills and equipment that can assist Emergency Services with the management of an emergency.

The incident management process utilised at SUEZ sites takes place in four phases:

PHASE	ELEMENTS
<b>Identification</b>	An emergency is identified and the alarm raised.
<b>Response</b>	Response actions take place in parallel rather than sequentially, minimising the impact of the emergency; these being: <ol style="list-style-type: none"> <li>1. The safety of personnel (isolation of incident area, evacuation, rescue, first aid);</li> <li>2. Establishment of the Incident Management Structure;</li> <li>3. Assessment/investigation of the incident;</li> <li>4. Classification of the incident and notifications.</li> </ol>
<b>Stabilisation</b>	Objectives and strategies are developed resulting in an action plan being implemented to combat the incident. Progress is continually re-assessed.
<b>Recovery</b>	Incident condition is eliminated and incident closed reporting, investigation and notifications, debrief, lessons learnt.

The incident management phases and the actions in each phase are detailed in the IMP and are supported by Incident Response Procedures (IRPs) which have been developed for potential emergency situations

Incidents are classified based on assessment variables such as whether sufficient plant resources can manage the incident, or the extent of the impact of the incident (i.e. localised, site and off-site). The classification determines the notification and reporting requirements and the incident management structure formed. The roles and responsibilities of each incident management member is defined in the management system.

Incidents classified as major (an “emergency”) instigate SUEZ’s Crisis Management Plan which describes SUEZ Australia’s management of the incident externally (e.g. with stakeholders), within the company and at the plant. Depending on the incident, a Crisis Management Team may be set-up and roles assigned for incident management functions as described in the plan.



**SYDNEY WATER CORPORATION**

Pollution release – Air emissions and stormwater releases to Prospect Reservoir and Prospect Creek

Violation of Environment Protection License 4458

Community notification and the management of potential or actual pollution events arising from the PWF that may have off-site consequences are coordinated by the Local and District Emergency Management Committees who have Emergency Management Arrangements in place. The committees have representatives from Fire & Rescue NSW, Fairfield Council, Department of Health, Ambulance, Police, SES and the Local and District Emergency Management Officers and are charged with emergency management planning/consequence management at a local level within the local community. Local and District Emergency Management Officers have copies of the IMP and IRP's, along with the Material Safety Data Sheets for the process chemicals stored on-site, which have been used for the development of response plans by the committees.

Consultation with Local and District Emergency Management Committees and Officers, along with their participation in pollution incident simulations ensures that the consequence management both on and off-site is effective and coordinated.

## Management of Plan

SUEZ's management system is based on improvement and includes the following main elements:

- Scheduled audits and procedural reviews that ensure that the plan and response procedures are adequate and equipment is in place to mitigate the hazards and risks associated with pollution events.
- Corrective action/preventative action and incident investigation processes that include undertaking a root cause analysis, the identification, assignment and management of actions, and reviewing their effectiveness once completed. The process also ensures that findings are shared and lessons learned;
- Training in pollution incident response, ensuring that staff are familiar with required actions and assigned roles in incidents, as well as the hazards and risks associated with particular incident scenarios.
- Scheduled emergency simulations involving stakeholders such as the Emergency Services and the Local or District Emergency Management Officers.
- Hazard identification and risk assessment process as a means of identifying hazards, assessing probabilities and consequences of incidents, implementing risk mitigation measures and evaluating their effectiveness.