

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

COBAR SEWERAGE TREATMENT SYSTEM

EPA LICENSE NO. 4324

KIDMAN WAY

COBAR NSW

PLAN DETAILS

Report Title: Pollution Incident Response Management Plan

Site Description: Cobar Sewerage System

Site Location: Kidman Way Cobar

License No. 4324

Site Owner: Cobar Shire Council

Council File: \$3-6

Plan Date: June 2022

Version: Version 5

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1. INTRODUCTION

This pollution incident response management plan (PIRMP) has been developed in accordance with the relevant requirements of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009* (POEO (G) Regs).

The PIRMP details:

- o Procedures for notifying a pollution incident to relevant persons;
- o Actions to be taken to reduce and/or control pollution; and
- o Procedures for coordinating those notified and any action taken in combating the pollution.

1.1 LEGISLATIVE REQUIREMENTS

In accordance with these legislative benchmarks, Cobar Shire Council has undertaken the following:

Task	Legislative Provision
Prepared a PIRMP	Section 153A of POEO Act
A PIRMP that includes information detailed in	Section 153C of POEO Act
POEO Act & Regulation	Clause 98C POEO (Gen) Regs 2009
A PIRMP that is in the form required by POEO	Clause 98B of POEO (G) Regs 2009
Regs	_

Following acceptance of this plan by NSW EPA, Council will implement the following:

Task	Legislative Provision
Locate the adopted PIRMP at the Cobar Sewerage Treatment Plant	Section 153D of POEO Act
Make the PIRMP available on Council's web site www.cobar.nsw.gov.au	Clause 98D(2) of POEO (G) Regs 2009
Test the plan in accordance with the POEO Regs	Clause 98C of POEO (G) Regs 2009
Implement the plan should a pollution incident occur	Section 153F of POEO Act
Review the plan should a pollution incident occur	Clause 98C(1)(o)
Test the plan and update the PIRMP	Clause 98 E 2(a)

2 SITE OVERVIEW

Cobar Sewerage Scheme (CSS) provides sewerage services to around 1,580 residential and 123 non-residential properties. Cobar SS consists of 83 km of gravity reticulation mains, 1.3 km of rising mains and four sewage pumping stations (SPS).

SPS1 (Ward Oval) pumps all sewage to the Cobar Sewage treatment plant, located to the south of town. The majority of Cobar's sewage gravitates to SPS1. There are three other SPS that have their own smaller gravity catchments, and sewage from these catchments is pumped to the SPS1 catchment. SPS2, 3, and 4 were all upgraded in 2021 to replace the pumps, pipework, and switchboard. A new pump well, emergency storage and rising mains were constructed for SPS3 in response to overflows at the SPS.

The Cobar sewage treatment plant, constructed in 1982, treats sewage by an aerated lagoon system. The design capacity of the STP is 8,000 EP.



Figure: Cobar Sewerage Treatment Plant aerial view

The treatment process consists of the process units:

- o Inlet works with screening and grit removal
- o 1 x aerated lagoon
- o 2 x facultative lagoons in parallel
- 5 x effluent polishing ponds in series
- 1 x treated effluent storage pond (Turkeys Nest)
- o 1 x emergency wet weather storage pond

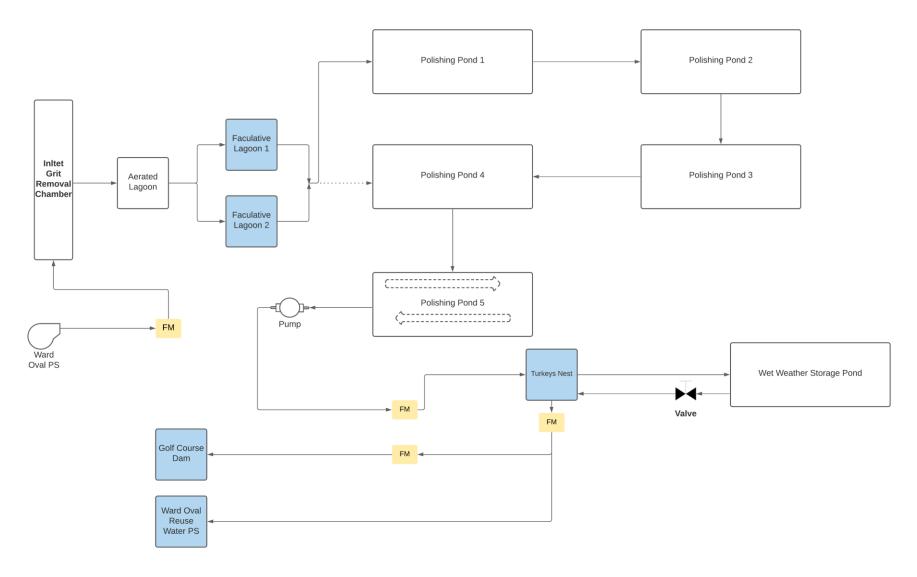


Figure: Design Of The Facility

3. DESCRIPTION OF HAZARDS

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:

- "(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 (or such other amount as is prescribed by the regulations), 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 DESCRIPTION AND LIKELIHOOD OF HAZARDS

In accordance with Clauses 98C (1) (a) & (b) of the POEO (G) Regs 2009 this plan is to include the following:

- (a) A description of the hazards to human health or the environment associated with the activity to which the license relates
- (b) The likelihood of any such hazards occurring, including details of any condition or events that could, or would, increase that likelihood

The following table summarises the description and likelihood of hazards associated with the activities conducted at the Cobar Sewerage Treatment System:

Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Wet weather overflow from the reticulation system during wet weather.	Low	Medium	Prolonged periods of heavy rain, heavy infiltration of stormwater into the sewer network
Dry weather overflow from the reticulation/pump station system during dry weather.	Low	High	Mechanical failure of plant and equipment. Infrastructure failure
Lagoon failure at the STP.	Medium	High	Prolonged periods of heavy rain, lack of pond and site maintenance and/or a mechanical failure of plant and equipment

Mechanical failure at the STP results in discharge of untreated sewage.	Low	High	Fire damage or poor maintenance of plant and equipment. Prolonged periods of heavy rain
Mechanical failure at the STP results in offensive odour from the premises.	Low	Low	Fire damage or poor maintenance of plant and equipment
Acts of vandalism or target of terrorist activity at the STP.	Low	Medium	Increased risk during hours of closure
Discharge pipeline breakage.	Low	High	Poor maintenance of plant and equipment. Flows exceeding pipe and pump capacity
Significant adverse environmental impact from irrigation in utilisation areas.	Low	Low	Human error. Lack of control and/or monitoring. Prolonged periods of heavy rain
Prolonged period of power loss	Low	High	Storms. Power lines damaged
Blocked sewer mains	Medium	High	Flushing of unapproved items. Fat/oil/grease drainage. Lack of utilising fat traps.

4. PRE-EMPTIVE ACTIONS TO BE TAKEN

In accordance with Clause 98C (1) (c) of the POEO (G) Regulation this plan is to detail appropriate and relevant 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 Cobar Sewerage Treatment Plant and System.

The following table summarises these pre-emptive actions in response to relevant risks:

Relevant Risk associated with this facility	Pre-Emptive Action/s
Fire	 Water storage with surface 50mm reticulation system with coverage of all areas Fire extinguishers at various locations around the buildings Security gates, and security fencing to discourage arson Maintaining machinery in good working order to minimise risk of sparks Vegitation management
Power failure at STP	 Maintain secondary effluent ponds empty and ready to contain overflows Site Operators carry out inspections to ensure plant and equipment are operating effectively and efficiently

Mechanical failure at STP	 Routine maintenance schedules Routine inspection of pumps and operating equipment Secondary effluent ponds empty and ready to contain overflows
Extended power failure at pump station(s)	 Maintain secondary effluent ponds empty and ready to contain overflows
Mechanical failure at pump station(s)	 Routine maintenance schedules. Routine inspection of pumps and operating equipment Telemetry monitoring Have standby replacement pumps on hand
Heavy rainfall	 Sewerage system maintenance and rehabilitation to reduce infiltration and inflows Spare capacity in lagoons Monitoring and maintenance
Sewer main breaks	 Routine maintenance of the system Access to a vacuum truck for emergency purposes.
Infrastructure failure (general)	 Maintenance and renewal programs Asset condition assessment Sewer relining program
Acts of vandalism or theft	 CCTV is installed A security fence to prevent unauthorised access

5. INVENTORY OF POLLUTANTS

In accordance with Clause 98C (1) (d) & (e) of the POEO (G) Regs this plan is to detail an inventory of potential pollutants on the premises or used in carrying out the relevant activity and the maximum quantity of any pollutant that is likely to be stored or held at particular locations or at the premises to which the license relates.

The premises subject to this license is a Sewerage Treatment Plant. Chemicals and potential pollutants are not stored on-site.

6. SAFETY EQUIPMENT & DEVICES

Pursuant to clause 98C (1) (f) of the Protection of the Environment Operations (General) Regulation 2009, 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 must be included in this plan.

The following table details this relevant safety equipment:

Type of Pollution Incident	Safety or other devices to contain or control a pollution incident
Fire causing damage to STP and sewage overflow	 Water storage with surface 50mm reticulation system with coverage of all areas Fire extinguishers at various locations around the buildings Security gates, security fencing to discourage arson Mobile phones to communicate with Council staff on-site whilst fighting a fire
Extended power failure causing STP to overflow	Overflow ponds empty and ready to contain overflows
Extended power failure causing pump stations to overflow	GeneratorsDiesel pump sets
Sewer main breaks	 Plant & equipment (backhoe, truck, etc) PPE Gas detector Harness Sandbags Disinfectant

7. CONTACT DETAILS

In accordance with Clause 98C (1) (g) & (h) of the POEO (G) Regs, this plan must include contact details of key individuals who are responsible for activating the plans and managing the response, including notification of relevant authorities and managing the response to a pollution incident.

The following table provides the order of notification, names, position titles and 24-hour contact details of the instrumentalities and individuals to be advised of pollution incidents:

	Authority Name	Individual Name/Position Title	24-hour contact details
1	NSW Environment Protection Authority	NSW Environment Protection Authority	131 555
2	Ministry of Health	Public Health Officer on call	6885 8666 (ask for Public Health Officer on call, or if no answer 0418 866 397)
3	Safe Work NSW	Dubbo Safe Work NSW Office	13 10 50
4	Emergency Services	NSW Fire and Rescue, Rural Fire Services, NSW Ambulance Service, NSW Police Force	000
5	State Emergency Services	Cobar State Emergency Services	132 500
6	Cobar Shire Council	After-hours emergency numbers	0417 413 816

7.1 HIERARCHY OF STAFF REPORTING

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

	People to Contact	Contact Details	lr	nstances where contact is warranted and why
1.	After Hours Call Out Phone	0417 413 816		All Contact relevant staff for a response
2.	Water and Sewer Team Leader	0491 944 569		All Organise staff and equipment to address the issue Invoke PIRMP
3.	Water and Sewer Coordinator	0459 840 536	•	Liaise with EPA Coordinate the repair and remediation
4.	Water and Sewer Graduate	0456 601 200	•	Assist Team Leader and liaise with Manager to see relevant protocols are being met
5.	Water and Sewer Manager	0438 925 682		When there are insufficient resources Contact Director and/or General Manager if required

6.	Director Infrastructure Services (Engineering)	02 68365826	•	When severe disruptions to services are likely Fire When there is a major repair cost
7.	General Manager	0419 281 115	•	When severe disruptions to services are likely Fire.

- 1. Initial reporting of an incident should be made to the Council's Water & Sewer Coordinator who is charged with the responsibility of organising staff and equipment to initially respond to any event.
- 2. If the Water & Sewer Coordinator is unavailable then the Water and Sewer Manager should be advised.
- 3. In the unlikely event that either of the above-named persons is unavailable then Director Infrastructure Services (Engineering) should be contacted as a last resort and the General Manager is to be advised of the incident status.

8. NOTIFICATION

The party who assumes the role of the first respondent from the above list is charged with the responsibility of notifying or directing other staff to notify the instrumentalities from the above and following (Part 7) Community list if it is considered they are or may be potentially affected.

8.1 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 is taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Other information prescribed by the regulations.

Notification is required by the site in charge 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.

9. COMMUNICATING WITH THE LOCAL COMMUNITY

The Cobar Sewage Treatment Facility is located approximately 2 kilometers from the center of Cobar. It is surrounded by sparse bushland in all directions. Access to the site is from Kidman Way.

There is an arid scrub buffer between the operable part of this site and Kidman Way of around 500 meters. The closest residential occupancy is also around 500 meters away.

The only type of pollution incident where communication is necessary to the neighbours is a large fire at the STP or an overflow of all effluent ponds onto neighbouring properties.

Depending on the severity of the incident and the likelihood of impact on the community, a range of communications methods can be deployed during and after an incident. These include:

- Site visits
- Phone calls
- SMS messages
- Emails (external and internal)
- Social media or website updates
- Media alerts
- Warning signs

Depending on the incident; WaterNSW has an early warning system to alert Water Licence Holders. WaterNSW can be contacted and a request made for them to send an alert.

Residents that are potentially or actually affected by a pollution incident are to be notified promptly after a pollution incident has been initiated. The contact details of surrounding businesses at the highest risk of being affected by a pollution event and additional support that can be called upon in.

The following table provides contact details and instances where contact must be made to communicate details of the incident to nearby properties and relevant persons:

People to Contact	Contact Details	Instances where contact is warranted
Cobar Bowling and Golf Club	(02) 6836 2214	Overflow Incident/Fire
Kevin (Smoko) Martin Farm	0439 211 227	Overflow Incident/Fire
Cobar Mining Contractors	0427 854 715	To provide support
Septic Sam	(02) 6884 4555	To provide support
Community	Via Councils Facebook page	Only if they are impacted
Crown Lands	1800 886 235	Overflow Incident/Fire

10. MINIMISING HARM TO PERSONS ON THE PREMISES

Pursuant to Clause 98C (1) (j) of the Protection of the Environment Operations (General) Regulation 2009, this plan is to detail 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.

In the event evacuation of the site is deemed necessary, the party in control is to sound an alarm to warn anyone in attendance to evacuate the site.

The assembly area is located near the empty area in front of the entrance to the Sewage Treatment Plant. The Warden is to determine the presence of everyone who may have been on the site at that time. Evacuation Plan of Cobar Sewage Treatment Plant is given below.

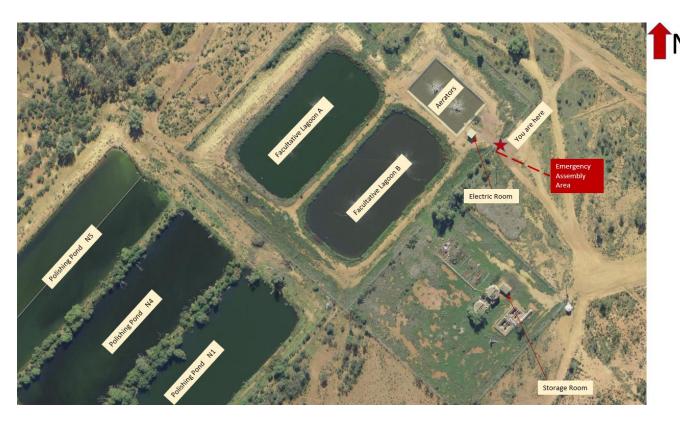


Fig: Evacuation Plan of Cobar Sewage Treatment Plant

11. MAPS

Pursuant to Clause 98C (1) (k) of the Protection of the Environment Operations (General) Regulation, this plan includes a detailed map or set of maps showing the location of the premises, 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. It should be noted that there are no stormwater drains on these premises.

Proximity to Cobar town-ship and adjoining property owners potentially to be impacted by pollution incident at the Sewerage Treatment Plant is given in the picture below.



Fig: Proximity of Sewage Treatment Plant to the Cobar town-ship

12. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

In accordance with Clause 98C (1) (I) of the POEO (G) Regs this plan must include detailed descriptions of the actions that will be taken by the licensee immediately after a pollution incident to reduce or control any pollution.

All site personnel with relevant training must make every effort to contain the pollution incident onsite, without putting themselves at risk of harm.

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher or fire hose.

A flow chart has been developed detailing the response procedure for pollution incidents at the Cobar Sewerage Treatment Plant. It also includes post-incident response.

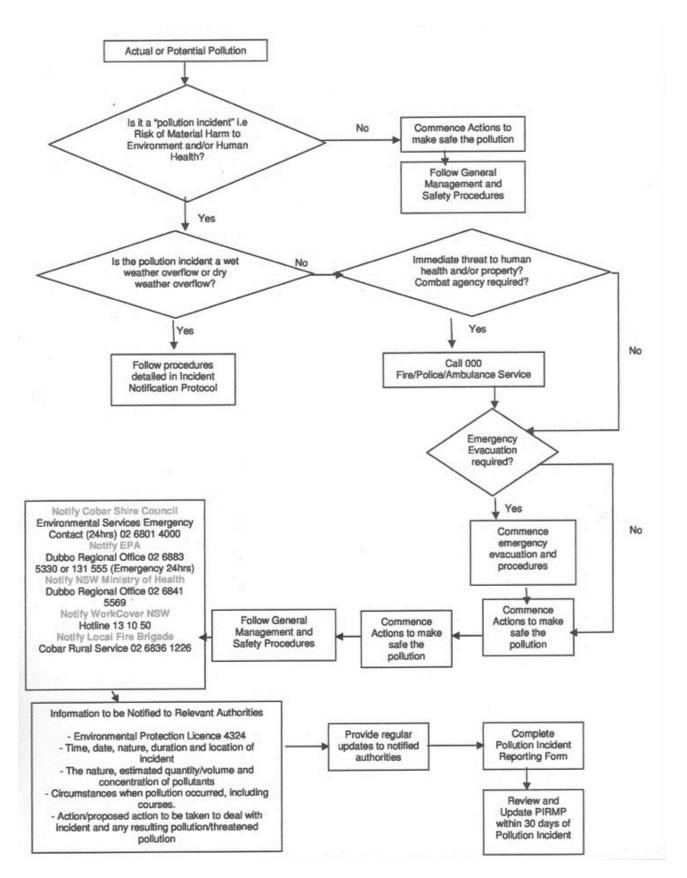


Fig: Document A - Pollution Incident Decision Flow Chart

13. STAFF TRAINING

Pursuant to Clause 98C (2e) of the Protection of the Environment Operations (General) Regulation this plan is to include details on the nature and objectives of any staff training program on implementing the plans.

For the implementation of this plan, meetings will be held between the Manager Water & Sewer and the following key Council staff:

- General Manager
- Director Engineering Services
- Water and Sewer Coordinator
- Water & Sewer Team Leader
- Water & Sewer Operators

The purpose of the meeting/s is to introduce each of these staff members to this plan and their obligations (if any) and advise where the location of the plan is held at the Sewage Treatment Plant.

Following this initial meeting, further meetings will be held with each of the aforementioned staff members following the annual test and review of the plan. The purpose of this meeting is to re-iterate the importance of the plan and to evaluate any shortcomings with the plan and any remedial actions.

The above training regime takes into consideration the size of the team related to Water & Sewer, the likelihood of pollution incidents at this facility and the expected level of risk associated with the operation of this facility.

Following each meeting, a record will be kept on Council file No. S3-6. This file is held in the Councils Administration building at 36 Linsley Street Cobar.

13.1 PLAN TESTING AND UPDATES

Pursuant to Clause 98C (1) (n-p) of the Protection of the Environment Operations (General) Regulation 2009 this plan is to provide details of the testing/maintenance of this plan and the date when this plan is updated.

This plan shall be tested annually from the date of the original implementation the plan. The plan will consist of a desktop simulation of the plan to evaluate the effectiveness of the plan and the accuracy of processes/details. The plan will also be tested from time to time with on-site mock exercises.

A record of the test will be maintained during and following the test and will include:

- The manner in which the plan was tested
- The date of the test/s
- Name of staff members who carried out the testing

Furthermore, this plan will be the subject of an annual review. Where changes are needed, the updates will be recorded. The following records will be captured following an update:

- Details of the update
- Date which the update was made
- Details of the staff members who carried out the review, update and peer review of the update

Furthermore, the plan will be tested within one month of a pollution incident occurring, in light of that incident, whether the information included in the plan is accurate and up to date, and whether the plan is still capable of being implemented in a workable and effective manner.

Version 4 of the PIRMP was reviewed and amended to ensure the quality, performance, reliability and accuracy of the PIRMP in 2022 by following PIRMP testing (See Section 14).

DATE	ITEM	DETAILS	OUTCOME
18/07/22	Test & Simulation	See Section 13 for details and staff attendees	Training
19/07/22	PIRMP updated	Following training and testing updated the PIRMP	PIRMP Accuracy
20/07/22	PIRMP updated	Review currency of PIRMP by Council staff	Version 4 Superseded
20/07/22	PIRMP updated	Change to various sections & update Contact details	Version 4 Superseded
25/07/22	PIRMP updated	Council amendments included in the final copy	Version 5 Finalised

14. SIMULATION EXERCISE DETAILS

14.1 TRAINING AND TESTING THE PLAN

Training in the Format and Use of a Pollution Incident Response Management Plan (PIRMP)

Date: 18th July 2022

Venue: Council Office Chamber

TIME	ACTIVITY	TASK	
1.00 pm	Welcome & Introduction To PIRMP	 The importance of having good systems in place PIRMP – background and key components and responsibilities Pollution incident prevention, recognition and preparedness Pollution incident control and response Pollution incident procedures Record keeping and reporting 	
2:00 PM	Notification, communications and reporting	 Roles and responsibilities PIRMP maintenance and revision Notification and communications Safety of employees and facility users The protection of facility assets The management of pollution incidents 	
2.45pm - 3:45pm	Testing the Plan	 Discussion on what constitutes a minor incident and what constitutes a major incident. How to respond to such incidents. Training obligations How to test and record the required response to a major pollution incident Desktop simulation exercises The role of the Regulator EPA Investigations Post Incident Checklist Review and Close 	
3:45pm - 4pm	Wrap-up and closure	Question and answer sectionReview on things learned	

14.2 TRAINING ATTENDEE LIST

NAME	SIGNATURE
Kim Greenwood - Water & Sewer Coordinator	M
Radhu Dileep - Graduate Engineer	Radi
Neil Thomas - Water & Sewer Leader	MedShorros
Daryl Jermyn - Water & Sewer attendant	Springer .
Leewayne Manns - Water & Sewer attendant	Leavaye Maris.
Stephen Wells - Water & Sewer attendant	Silica).
Brandon Jones - Water & Sewer attendant	
Peter Hosie - WTP operator	WW.
Llyod Mitchell - WTP operator	

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN SIMULATION EXERCISE - EVALUATION FORM

Facility: Sewerage Treatment System

RESPONSE SEQUENCE:	DATE: 18 th July 2022
POLLUTION INCIDENT	COMMENTS
Scenario 1 Cobar has met with a rainfall event of the century, where the area received heavy precipitation in a small amount of time. The partially treated sewage in the sewage treatment plant is flowing out of its processing unit.	
Assessment of significance	Minor incident
Initiation of PIRMP. Incident response/notification of incident (all "relevant" agencies)	Refer to PIRMP to see who initiates the plan? What are the roles and responsibilities of person? Call Water and Sewer Leader in charge and explain the situation Take note of the time, date, nature, duration and location of the incident Make Phone calls to relevant agencies
Evacuation alarm sounded (if necessary)	Not necessary
Incident control/remediation action commenced —	Investigate the site Notify supervisor of the findings in the site Use signage if required and keep the public away Check if need to organise a truck Check if sand-bag cover is required Assess damage to assets
Evacuation commenced (if necessary)	Not necessary

Warden checks for personnel present	Not necessary
Evacuation completed (if necessary)	Not necessary
Pollution contained –	Necessary actions to contain the pollution
	Take photographic evidence
	Report incident and situation to EPA
	Provide written report to EPA within 7 days
Clean up commenced	Take necessary self reporting
	Check if the disinfection is required

Scanario 2	
An outbreak of a new kind of virus in a water sample. Tests on Cobar water sewage Treatment Plant water raised an issue as the samples contain a mutated virus. It is unclear what kind of virus it is and how it affects human health.	
Assessment of significance	Major incident
Initiation of PIRMP	Notify higher officials
Evacuation alarm sounded (if necessary)	Not necessary
Incident control/remediation action commenced –	Pump back the sewage into treatment facility itself
	Don't allow it to spread
	Use necessary PPE while handling any samples like double gloves, mask, protective clothing
	Clean the clothes after work
	If sick, isolate and seek medical help
	Send samples to NSW health and seek help
	Refer to PIRMP and notify contacts as required
Evacuation commenced (if necessary)	Not necessary
Warden checks for personnel present	Not necessary
Evacuation completed (if necessary)	Not necessary
Pollution contained –	Report to EPA and NSW health
	Take orders from NSW health
Clean up commenced	Disinfect the area

APPENDIX

I. DETAILS OF THE INCIDENT FORM

Ensure Incident Report Form completed and actioned after every incident.

DE	TAIL REQUIRED	DETAILS PROVIDED
A.	The time, date, nature, duration and location of the incident	
В.	The location of the place where pollution is occurring or is likely to occur	
C.	The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known	
D.	The circumstances in which the incident occurred, including the cause of the incident, if known	
E.	The action is taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known	
F.	Other information prescribed by the regulations.	

II. AGENCY NOTIFICATION FORMS

AGENCY	DATE	TIME	AGENCY CONTACT PERSON	REFERENCE NUMBER	AGENCY COMMENTS OR FURTHER ACTIONS
NSW Environment Protection Authority (EPA) 131 555					
Ministry of Health 6885 8666 (Public Health Officer on call, or call 0418 866 397)					
Safe Work NSW 13 10 50					
Emergency Services 000					
State Emergency Services 132 500					
Cobar Shire Council 0417 413 816					

III. LANDHOLDER NOTIFICATION FORM

LANDHOLDER	DATE	TIME	AGENCY CONTACT PERSON	COMMENTS AND FURTHER ACTION