

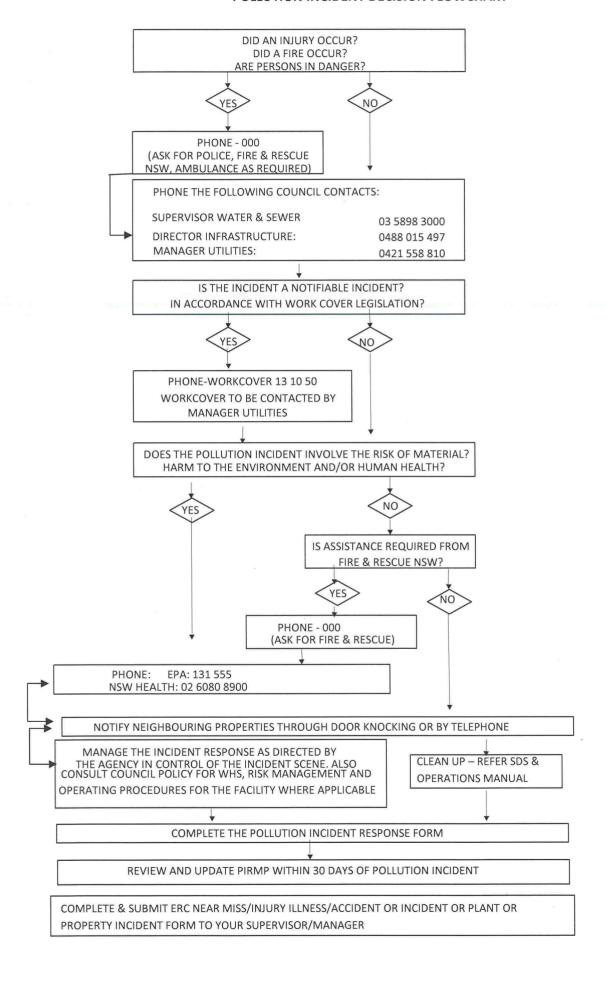
# Pollution Incident Response Management Plan

Deniliquin Sewage Treatment System

EPA License: 1694

June 2024 (v12)

#### POLLUTION INCIDENT DECISION FLOWCHART



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#### 1. INTRODUCTION

Council was notified by the EPA in January 2012 of the following (as set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation)):

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act);
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO (G) Regulation (clause 98B);
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act);
- Licensees must test the plan in accordance with the POEO (G) Regulation (clause 98E); and
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

This document sets out Council's response to pollution incidents for EPA Licence 1694.

# 2. DETAILS OF PREMISES

The details of the premises for which this Pollution Incident Response Management Plan (PIRMP) relates to is defined in Section A2 of EPA Licence 1694, as follows:

Deniliquin Sewage Treatment System Calimo Street Deniliquin NSW 2710

The nearest cross street is Macauley St

# **GPS Co-ordinates**

Easting	Northing	Longitude WGS84	Latitude WGS84		
313255.193	6065507.844	144.940128	-35.536491		

#### **Premises Details:**

Lots 497, 498 DP722049, Lots 2 & 3 DP1213955, Lots 347, 348 DP756325, Lot 3 DP855869, Lot 527 DP822986 & Lot 489 DP721980

The premises also include the reticulation network and pumping stations owned and operated by the licensee that is associated with the sewage treatment plant (s) identified above.

For Pump Station locations see Appendix F

# 3. DEFINITION OF POLLUTION INCIDENT

The definition of a pollution incident is:

"pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise. "

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 as:

- 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.

Industry is required to report pollution incidents *immediately* to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

# 4. POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

A risk assessment and analysis for pollution incidents at the Deniliquin Sewage Treatment System is included in **Appendix A**. This includes:

- Description of potential pollution incidents;
- Risk assessment for these potential incidents based on likelihood and impact; and
- Contributing factors that may lead to the incident occurring.

#### 5. POLLUTION INCIDENT RESPONSE DECISION FLOW CHART

A flow chart detailing the decision-making process regarding pollution incident responses is included at the start of this document. The flowchart provided for all staff involved in a pollution incident as to their, and Council's, legislative and regulatory responsibilities.

All staff involved with the Deniliquin Sewage Treatment System shall be trained in the use and requirements of this flow chart.

A copy of the flow chart and contact details shall be placed in the following locations:

- Office at the Deniliquin Sewage Treatment Plant;
- At each Sewage Pump Station; and
- In each of the Services Section vehicles.

#### 6. NOTIFICATION OF POLLUTION INCIDENT

Where the pollution event incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the site supervisor or staff member responsible for the site at the time of the incident:

# **NOTIFICATION OF RELEVANT AUTHORITIES**

# a. Emergency Call Services

# • Emergency Hotline Number (24 hours)

000

The site supervisor or staff member responsible for the site should call **000** if the incident presents an immediate threat to human health and/or property and a combat agency is required. They are then to notify all other parties noted below including NSW Fire and Rescue via a local telephone number.

### b. Edward River Council

•	Supervisor Water & Sewer	03 5898 3000
•	Manager Utilities	0421 558 810
•	Director Infrastructure	0488 015 497
•	Duty Sewage Treatment Plant Operator	0419 439 805

# c. Environmental Protection Authority

Emergency Hotline (24 hours)

131 555

•

# d. NSW Ministry of Health (via Public Health Units)

•	Albury Regional Office	02 6080 8900
•	Public Health Officer (24 hours)	02 6080 8900

Ask for Public Health Officer on call

#### e. WorkCover NSW

Hotline Number

13 10 50

# f. Fire and Rescue NSW

Fire and Rescue NSW

000

# 7. NOTIFICATION OF POLLUTION INCIDENT REPORTING FORM

A copy of the Pollution Incident Reporting Form is attached in Appendix B of this document.

# 8. INVENTORY OF POTENTIAL POLLUTANTS

A list of potential pollutants found on the premises is included in **Appendix C** of this document.

# 9. SAFETY EQUIPMENT AND INFRASTRUCTURE USED TO CONTAIN OR CONTROL IMPACT OF POLLUTION INCIDENT

A list of safety equipment and infrastructure provided as part of the Deniliquin Sewage Treatment System and used for the control and containment of pollution incidents is included in **Appendix D** of this document.

# 10. NAME AND CONTACT DETAILS OF OWNERS AND OCCUPIERS OF PREMISES IN THE VICINITY

Details of properties in the vicinity of the Sewage Treatment Plant and pump stations may be sourced directly from Council's intranet/GIS system.

Council staff shall contact residents during a pollution incident by door knocking at the discretion of the combat authority or Council's Director Technical Services.

# 11. STAFF TRAINING

Training shall be provided to relevant staff that work as part of the Deniliquin Sewage Treatment System in the implementation of this PIRMP. A register of staff that have been trained is included in **Appendix E** of this document.

### 12. TESTING OF THE PIRMP

Testing of the PIRMP shall be conducted on a yearly basis as a desktop exercise with scenarios based on the site conditions.

Safety equipment noted in this PIRMP shall be inspected yearly as part of the testing procedure.

Records of the tests shall be included in **Appendix G** of this document.

# 13. INCIDENT/ACCIDENT REPORTING FLOW CHART

Complete and submit ERC near Miss/Injury, Illness/Accident or Incident, Plant or Property Incident form to your Supervisor/Manager

# **APPENDIX A**

POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table A1 – Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Sewage Treatment Plan	<u>t</u>		
Wet weather bypass at the Sewage Treatment Plant (STP) and is when untreated sewage bypasses the sewage treatment process and discharges to the environment.	Low	High	Prolonged periods of heavy rain, lack of pond and site maintenance and/or mechanical failure of plant and equipment.
Dry weather bypass at the Sewage Treatment Plant (STP) and is when untreated sewage bypasses the sewage treatment process and discharges to the environment.	Very Low	High	Lack of pond and site maintenance and/or mechanical failure of plant and equipment.
Pond failure at the STP.	Low	Low	Prolonged periods of heavy rain, lack of pond and site maintenance and/or 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.
Inadequate chemical storage.	Very Low	Very Low	Human error. Chemical fire accelerated by high winds, dry weather, periods of prolonged
Acts of vandalism or target of terrorist activity at the STP.	Low	Medium	Increased risks during hours of closure.

Discharge pipeline breakage.	Low	Low	Poor maintenance of plant and equipment. Flows exceeding pipe and pump capacity.
Exceed License discharge limits to the environment	Low	Low	Prolonged periods of heavy rain and mechanical failure of plant and equipment.
Significant adverse environmental impact from irrigation in utilisation areas.	Low	Low	Human error. Lack of control and/or monitoring. Prolonged periods of heavy rain.
Sewage Pumping St	ations		
Mechanical failure at the SPS results in discharge of untreated sewage.	Low	High	Fire damage or poor maintenance of plant and equipment. Prolonged periods of heavy rain resulting in long run times.
Mechanical failure at the SPS results in offensive odour from the premises.	Low	Low	Fire damage or poor maintenance of plant and equipment.
Power Outage	Medium	Medium	Maintenance, equipment failure, Utility network failure.
Acts of vandalism or target of terrorist activity at the SPS.	Low	Medium	Increased risks during hours of closure.
Reticulation			
Broken Mains Pipe	Low	Low	Increased risk during hours of closure. Public response activates duty callout personnel.
Wet weather overflow from the reticulation system during wet weather	Refer to Council's policy regarding Sewer Overflows.	Refer to Council's policy regarding Sewer Overflows	Refer to Council's policy regarding Sewer Overflows
Dry weather overflow from the reticulation system.	Refer to Council's policy regarding Sewer Overflows	Refer to Council's policy regarding Sewer Overflows	Refer to Council's policy regarding Sewer Overflows

# **APPENDIX B**

NOTIFICATION OF POLLUTION INCIDENT REPORTING FORM

POLLUTION INCIDENT REPORTING FORM	Page 1 of 5
Incident No:	Time:
Date:	Duration of Incident:
Weather Conditions:	
Temperature:°C	Wind Speed:km/hr
Relative Humidity:%	Wind Direction:
Fire Danger Rating:	Rainfall since 9am:mm
Location of Incident:	
Nature of Incident:	
Description of the Incident:	
Actions taken to contain/manage the Incident:	
,	
Were photos taken: Yes ☐ No	☐ Were samples taken: Yes ☐ No ☐
Details of Person Reporting the Incident:	
Name:	Phone Contact:
Section:	Date:

POLLUTION INCIDENT REPORTING FORM							of 5		
Immediate Action by Supervisor/Manager									
1.	Require assistance from other agencies to contain, isolate or clean up:	Yes		No		Not sure			
	If "Yes" call 000 immediately								
2.	Pose any actual or potential harm to human health that is not trivial:	Yes		No		Not sure			
	Is it located within 100m of a school, childcare of	centre, a	aged (	care ho	me, l	nospital′	?		
	<ul> <li>Could it impact on users of public areas such as</li> </ul>	s ovals,	reser	ves, w	aterw	ays?			
	<ul> <li>Could the impact spread and potentially harm of</li> </ul>	ccupan	ts of r	nearby	prope	erties?			
3.	Pose any actual or potential harm to ecosystems that is not trivial:	Yes		No		Not sure			
	<ul> <li>Could the incident flow/impact on a water body or drainage system?</li> </ul>								
	Could the incident flow/impact on environmentally sensitive land?								
4.	Result in actual or potential loss or property damage of an amount over \$10,000.	Yes		No		Not sure			
If you answered <b>'Yes' to any of the above</b> then the incident should be considered as a notifiable pollution event'. There is a <b>duty to notify</b> the EPA, Ministry of Health, WorkCover and Fire and Rescue NSW immediately after becoming aware of a pollution incident where material harm is caused or threatened. Failure to do so is an offence (Protection of the Environment Operations Act 1997).									

Please refer to Pollution Incident Decision Flow Chart and Section 6 of this document for contact details.

# POLLUTION INCIDENT REPORTING FORM

NSW Health - Local Public Health Unit Call 02 6080 8900 Ask for Public Health Officer on duty					
Contacted: Yes   No  Reason not contacted:					
Name of PHU Representative:					
Time and Date: PHU Ref #:					
Actions required by PHU:					
WorkCover Authority Call 13 10 50					
Contacted: Yes   No  Reason not contacted:					
Name of WorkCover Representative:					
Time and Date: WorkCover Ref #:					
Actions required by WorkCover:					
Fire & Rescue NSW Call 000					
Contacted: Yes   No  Reason not contacted:					
Name of Fire & Rescue Representative:					
Time and Date: Fire & Rescue Ref #:					
Actions required by Fire & Rescue:					

Edward River Council						
Supervisor Water & Sewer: 03 5898 3000						
Contacted:	Yes		No		Reason not contacted:	
Manager Utili	ties: 04	121 558	8 810			
Contacted:	Yes		No		Reason not contacted:	
Director Infras	structur	e: 048	8 015	497		
Contacted:	Yes		No		Reason not contacted:	
General Mana	ager: 0	3 5898	3000			
Contacted:	Yes		No		Reason not contacted:	
Neighbour N	otificat	ion				
Has Council k agency / EPA		rected	to cont	acted	neighbours by a combat	Yes □ No □
Has Council v	Has Council voluntarily contacted neighbours? Yes ☐ No ☐			Yes □ No □		
<u>Name</u>			Address	Contact Method		
				*******		
	•••••					
				*****		

# POLLUTION INCIDENT REPORTING FORM

Page 5 of 5

Preliminary Investigation:
Notes from Discussions with relevant operational staff:
Any further observations or comments by Supervisor / Manager:
Details of Appropriate Section Supervisor/Manager Reporting the Incident:
Name: Phone Contact:
Section: Date:

# **APPENDIX C**

LIST OF POTENTIAL POLLUTANTS THAT MAY BE FOUND ON THE PREMISES

Chemical / Pollutant	Location	Quantity
Raw Sewage	Sewage Treatment Plant	1.7 ML
Hydrated Lime	Sewage Treatment Plant	200kg
Raw Sewage	Sewage Pumping Station	3000 L
Hydrated Lime	Sewage Pumping Station	50 kg

# **APPENDIX D**

LIST OF SAFETY EQUIPMENT AND INFRASTRUCTURE USED AS PART OF THE DENILIQUIN SEWAGE TREATMENT SYSTEM

Location	Description of Safety Equipment or Infrastructure
Sewage Treatment Plant	Safety Equipment
	There is no safety equipment available at the Sewage Treatment Plant. There is trailer with safety equipment available from the depot.
Pump Stations	Safety Equipment
	There is no safety equipment available at the Sewage Pumping Stations. There is trailer with safety equipment available from the depot.
Reticulation	Safety Equipment
	There is trailer with safety equipment available from the depot.

# **APPENDIX E**

STAFF TRAINING REGISTER

I CERTIFY THAT I HAVE BEEN INSTRUCTED IN THE PROCEDURES REQUIRED FOR EDWARD RIVER COUNCIL'S RESPONSE TO POLLUTION INCIDENTS AS REQUIRED UNDER THE PROTECTION OF THE ENVIRONMENT LEGISLATION AMENDMENT ACT 2011:

SIGNATURE OF STAFF MEMBER PROVIDING				200							5	
NAME OF STAFF MEMBER PROVIDING TRAINING	COOK	Cook	COOK	Cook	COOK	COOK	Ceok	Cook	COOK	Cook	COOK	
NAME ( MEMBER TRA	MARK COOK	MARK	MARK	MARK	MARK	MARK	MARK	MARK	MARK	MARK	MARK	100
SIGNATURE	It livere	Adgin Coodear	Margan	1 State	Michaelol		22	April.	A	GWY	8	
NAME	Jerohyu Lelangum	3 doesn Cadler	Joshua Larcombé	Logan Leipe	Mighander	13/5/24 Nalela Mayohua	Cory Theored	Allen Band	Mosey Baracy	G.HIRRM 5/	Shaper Williams	
DATE	23/5/24	23/5/2024, 3docu (	23 5 2024	13/05/24	23 11. 24 1	23/5/24	23/5/24	23/5/24	23/5/24	23/5/24	23/5/24	

ADDENDIVE	
APPENDIX F	
APPENDIX F  LOCATION OF SEWAGE PUMP STATIONS	
LOCATION OF SEWAGE PUMP STATIONS	
LOCATION OF SEWAGE PUMP STATIONS	

# LOCATION OF SEWAGE PUMP STATIONS AND TREATMENT FACILITY

Identifier	Physical Location	Nearest Intersection	Easting	Northing	Longitude (WGS84)	Latitude (WGS84)
(Private)	Adiacent to 140 Crispe St	Hetherington St and Crispe St	315043.857	6064877.963	144.959703	-35.542503
(Private)	Adjacent to Aero Club Rooms at Airport	Wirraway Dr and Mcknight Dr (Airport Dr)	314024.234	6063587.275	144.948165	-35.553942
(Private)	Saleyards Rd	Cobb Hwy and Saleyards Rd	314738.711	6064138.463	144.956169	-35.549109
P/S 01	Opposite 101 Macauley Street	Henry St and Macauley St	314533.192	6066347.914	144.954409	-35.529162
P/S 02	59 Decimus St	Poictiers St and Decimus St	314244.653	6067414.716	144.951473	-35.519495
P/S 03	Opposite 124 Burton St	Sloane St and Burton St	313572.559	6067141.412	144.944002	-35.521831
P/S 04	1 Butler St – Maclean Beach Caravan Park	Charlotte St and Butler St	315133.679	6067429.683	144.961275	-35.519526
P/S 05	Memorial Dr – Memorial Park Opposite Rovers Club Rooms	Golf Club Rd and Memorial Dr	316299.221	6065944.556	144.973785	-35.533125
P/S 06	81 Hunter St	Harfleur St and Hunter St	315424.164	6065534.939	144.964045	-35.536654
P/S 07	Ricemill Rd – Within Ricemill Boundary	Saleyards Rd and Ricemill Rd	313461.925	6064634.822	144.942206	-35.544397
P/S 08	Packenham St	Chamberlian Ct and Packenham St	315803.835	6064459.918	144.967986	-35.546411
P/S 09	Opposite 170 Hyde St	Victoria St and Hyde St	317133.593	6066862.359	144.983190	-35.525009
P/S 10	Adjacent to 351 Evans St	Lackington St and Evans St	316061.526	6066705.931	144.971337	-35.526220
P/S 11	At the Back of Property 422 Hay Rd (Cobb Hwy)	Robinson St and Victoria St	316394.073	6067738.510	144.975237	-35.516977
P/S 12	Opposite 274 River St (Pound St)	Yarra St and River St	317239.676	6066409.361	144.984257	-35.529110
P/S 13	Near Airport – Access via Saleyards Rd	Cobb Hwy and Saleyards Rd	314257.393	6063914.409	144.950811	-35.551038
P/S 15	Next to Airport Terminal Building	Wirraway Dr and Mcknight Dr (Airport Dr)	314119.877	6063524.378	144.949205	-35.554527
P/S 16	Maclean Beach near public toilets	Charlotte St and Butler St	315020.018	6067579.993	144.960056	-35.518150
P/S 17	Ross St	Burchfield Av and Ross St	315892.734	6064811.266	144.969046	-35.543262
P/S 18	Ochtertyre St (Wakool Rd)	Old Racecourse Rd and Ochtertyre St (Wakool Rd)	313614.720	6066272.189	144.944267	-35.529672
P/S 19	Davidson St – Edward River Oval	Smart St and Davidson St	315589.740	6066600.242	144.966113	-35.527085
P/S 20	Lilly St	River St and Lilly St	317916.668	6065699.915	144.991561	-35.535628
P/S 21	Adjacent to Basketball Stadium	Ochtertyre St (Cobb Hwy) and Wirraway Dr	314148.070	6065110.465	144.949880	-35.540240
P/S 23	Harrison St – Waring Gardens Park	Edwardes St and Harrison St	315260.904	6066186.496	144.962394	-35.530752
P/S 24	Dick St	Hetherington St and Dick St	315253.570	6064579.280	144.961947	-35.545233
P/S 25	Calimo St – Overflow Pump Station	Macauley St and Calimo St	313312.999	6065412.600	144.940743	-35.537361
P/S 26	Calimo St – Treatment Plant	Macauley St and Calimo St	313223.500	6065573.040	144.939794	-35.535898
P/S 27	72 Russell St	Russell St & Poictiers St	314651.758	6066729.798	144.955803	-35.525742
Barham Rd	Leetham Rd	Barham Rd and Leetham Rd	310539.820	6063254.690	144.909667	-35.556279
Houseboat	Charlotte St – Houseboat Pump Station on River	Hardinge St and Charlotte St	315475.285	6066669.358	144.964867	-35.526441
Treatment Plant					¥	

Calimo St

Version: 12

Macauley St and Calimo St

-35.536491

144.940128

313255.193 6065507.844

June 2024

APPENDIX G			
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PIRMP TEST RECORDS AND UPDATE REGISTER			
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# PIRMP TESTING AND UPDATE REGISTER

VERSION	DATE	TEST OR UPDATE	LAST INCIDENT DATE	SUPERVISOR'S ADVISED DATE	DETAILS
_	14 July 2014	Update			Issue of Version 1 of PIRMP.
1.7	02 June 2016	Test & Update			Desktop Test. Contact details updated
2	2 June 2016	Test & Update	N/A	N/A	Desktop Test. Contact details updated
8	24 October 2016	Test & Update	24 October 2016	24 October 2016	BELOW
The Dick St the STP sto	Pump Station had ockpile. EPA and NS	The Dick St Pump Station had a broken discharge pipe due the STP stockpile. EPA and NSW Health were both notified.	pipe due to ground m h notified.	ovement. This was repaired	pipe due to ground movement. This was repaired and the contaminated soil removed to notified.
4	7 June 2017	Test & Upgrade	N/A	N/A	Desktop test. Contact details updated
2	29 May 2018	Test & Upgrade	N/A	N/A	Desktop test. Contact details updated
				* 5	
9	19 June 2019	Test & Upgrade	A/A	N/A	Desktop test. Pump Station details updated as per below.
Private pum	np station at Saleya	Private pump station at Saleyards Road no longer		in service as this property is connected to low pressure sewer system.	ssure sewer system.
		5			

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2	22 August 2019	Test & Update	22 August 2019	29 October 2019	See below
The Hunter contaminate	The Hunter St Pump Station had a broken dischar contaminated soil removed and stored within the	ય a broken discharg	ge pipe due to ground TP site. EPA and NS\	The Hunter St Pump Station had a broken discharge pipe due to ground movement at the inlet works contaminated soil removed and stored within the STP site. EPA and NSW Health were both notified.	rge pipe due to ground movement at the inlet works to the STP. This was repaired and the STP site. EPA and NSW Health were both notified.
ω	11 June 2020	Test & Update	N/A	N/A	Desktop test and update of contact and premises details
0	11 June 2021	Test & Update	N/A	N/A	Desktop Test. Contact details updated (See below)
Macauley S excavated a	Macauley St sewer rising main damaged during excavated and both disposed of at the STP site	damaged during ex	cavation works in Ma	cauley St. The effluent was p	Macauley St sewer rising main damaged during excavation works in Macauley St. The effluent was pumped out and contaminated soil excavated and both disposed of at the STP site
10	15 June 2022	Test & Update	N/A	N/A	Desktop test and update of contact details. Pump station details updated (See below)
Addition of 1	new pump station in	Addition of new pump station installed at 72 Russell St	III St		
1	08 June 2023	Test & Update	N/A	N/A	Desktop test and update of contact details.
12	00 June 2024	Test & Update	N/A	N/A	Desktop test and update of contact details. Addition of ERC incident report form. (See below)
Rain event network. Hy	Rain event in Nov 23 which caused flash flooding network. Hydro vac of sewer network where requi		around central and we ed and affected pump	Rain event in Nov 23 which caused flash flooding around central and west areas of Deniliquin township. Council stanetwork. Hydro vac of sewer network where required and affected pump stations manually controlled as necessary	around central and west areas of Deniliquin township. Council staff monitored the sewer red and affected pump stations manually controlled as necessary

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# **APPENDIX H**

INCIDENT/ACCIDENT REPORTING FLOW CHART



# Section A - PERSON INVOLVED

Near Miss / Injury Illness/ Accident or Incident OR

**Plant or Property Incident** 

TO BE REPORTED TO
OR
REPORT GIVEN TO

# **Section C - SUPERVISOR**

Supervisor to check all information is correct before submitting document to Head Office

# **Section C - MANAGER**

Manager to Complete Form with Name Position,
Dates and Investigation Requirements.
Sign off Form.

SEND TO WHS / RISK OFFICER
WITHIN 24 HRS