Moonee WRP - PIRMP City of Coffs Harbour September 2024



Document Control

Document Controller: Water and Sewer Engineer

Date of last update: 2/09/24

Date of next update: 2/09/25

Version Control

Update	Date	Description	Prepared by	Approved by
1.0	25/05/20	Preparation of PIRMP in accordance with New Guideline March 2020	Andrew Miller	Angus Sharpe
2.0	15/03/21	Update following pollution incident (EPA Ref: C02833-2021)	Sam Towndrow	Andrew Miller
3.0	16/03/22	Reviewed	Matt Gittoes	Michael Lynch
4.0	27/04/23	Reviewed and updated contacts	Jason Rolff	Matt Gittoes
5.0	13/09/23	Updated Legislative Breach Register Notification Requirement	Max den Exter	Adam Wilson
6.0	2/09/24	Reviewed and updated contacts	Max den Exter	Jonathan Bell



Contents

Dod	cument Control	1
٧	/ersion Control	1
1.	Purpose	3
2.	Definition of a Pollution Incident	3
3.	Details of Environmental Protection Licence	4
4.	Notification of Relevant Authorities	4
5.	Description and Likelihood of Hazards	5
6.	Inventory of Potential Pollutants.	10
7.	Safety Equipment	10
8.	Communicating with the Public	11
8	3.1 Communicating with Neighbours	11
8	3.2 Communicating with the Local Community	12
9.	Minimising Harm to Persons on the Premises	12
10.	Actions to be Taken During or Immediately After a Pollution Incident	13
1	.0.1 Immediate Actions Following Sewer Overflow in the Reticulation System	14
1	.0.2 Immediate Actions Following a WRP Pollution Incident	14
11.	Staff Training	14
12.	Testing and Updating the PIRMP	15
App	pendix A – Maps	16
Ν	Лооnee WRP – Site Layout	17
Ν	Moonee WRP Site Evacuation Plan	18
Ν	Moonee Sewer Reticulation System	19
	Moonee Sewer Reticulation System – 1	20
	Moonee Sewer Reticulation System – 2	21
	Moonee Sewer Reticulation System – 3	22
	Moonee Sewer Reticulation System - 4	23
App	pendix B – Council Contact List	24
Δnr	pendix C – Coffs Harhour City Council Risk Assessment Matrix	25



1. Purpose

Coffs Harbour City Council holds an Environment Protection Licence (EPL 573) with the NSW Environment Protection Authority (EPA) for Moonee WRP. 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 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.

2. Definition of a Pollution Incident

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.

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm 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.'

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).



3. Details of Environmental Protection Licence

Table 3.1. Environmental Protection Licence Details

Environme	ental Protection Licence Details
Name of licensee:	Coffs Harbour City Council
	ABN 79 126 214 487
EPL number:	EPL 573
Premises name and address:	Moonee Water Reclamation Plant
	55 BUCCA ROAD
	BUCCA NSW 2450
Company or business contact details	Name: COFFS HARBOUR CITY COUNCIL
	Business hours contact number/s: 02 6648 4400
	After hours contact number/s: 02 6648 4000
	Email: coffs.council@chcc.nsw.gov.au
Website address:	www.coffsharbour.nsw.gov.au
Scheduled activity/activities on EPL:	Sewage treatment
Fee-based activity/activities on EPL:	Sewage treatment processing by small plants.
Responsible person: PIRMP activation	, Notifying relevant authorities and managing response to

Responsible person: PIRMP activation, Notifying relevant authorities and managing response to pollution incident.

Name: Jonathon Bell

Position or title: Water and Sewer Section Leader Business hours contact number/s: 02 6648 4889 After hours contact number/s:02 6648 4000 Email: jonathon.bell@chcc.nsw.gov.au

A complete council contact list can be found in Appendix B.

4. 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.

Note: Each authority does not need to be contacted for every pollution incident, only those that are relevant to the incident which has occurred.

Table 4.1 Relevant Authorities

Authority	Contact number
EPA	131 555
NSW Health, Mid North Coast	6588 2750 / 0428 822 805
SafeWork NSW, Coffs Harbour	13 10 50
CHCC EHO	6648 4665 / 6648 4000
Fire & Rescue NSW / Rural Fire Service	000
Solitary Island Marine Park	02 6691 0600
Coffs Harbour District Fisheries	6652 3977
National Parks, Coffs Harbour Office	02 6652 0900
Dolphin Marine Conservation Park	6659 1900



5. Description and Likelihood of Hazards

Table 5.1 provides a description of the hazards to human health or the environment associated with sewerage treatment. It also details the likelihood of each hazard occurring and pre-emptive actions taken to minimise or prevent harm to human health or the environment. Council has completed the below risk matrix in conjunction with the CHCC Risk Assessment Tool available in Appendix C.

Table 5.1 Description and likelihood of Hazards

Description of Hazard and Contributing Factors	Likelihood	Consequence	Risk	Pre-emptive actions	Response to Incident
Wet weather sewer overflow from the reticulation system due to excessive inflow and/or infiltration.	Almost Certain	Insignificant	Medium 11	I&I program Sewer jetting program Capital works renewal program Out of hours' staff roster	Council staff attend site and make safe. This may include the erecting of fences, signage, etc. Follow tasks outlined in section 10.
Dry weather sewer overflow from reticulation system due to choke, blockage or pipe failure.	Almost Certain	Minor	High 16	Sewer jetting program Capital works renewal program Out of hours' staff roster Telemetry system	Council staff attend site and clear blockage or repair pipe. Follow tasks outlined in section 10.
Dry weather sewer overflow due to rising main break	Likely	Moderate	High 17	Capital works renewal program	Shutdown affected sewer pump station.



				Out of hours' staff roster Telemetry system	Arrange tankers or bypass to manage incoming sewer. Council staff repair rising main. Follow tasks outlined in section 10.
Sewer Pump Station failure due to power outage	Likely	Minor	Medium 12	Portable generators. Onsite emergency storage. Telemetry System for early indication. Out of hours' staff roster (including on call fitter and electrician).	Monitor pump station on telemetry system. Organise generators for extended outage. Organise tankers to pump down pump station if required. Follow tasks outlined in section 10.
Sewer Pump Station failure due to electrical/mechanical breakdown	Likely	Minor	Medium 12	Mechanical/Electrical preventative maintenance program. Onsite emergency storage. Out of hours' staff roster (including on call fitter and electrician). Telemetry System.	Monitor pump station on telemetry system. Organise tankers to pump down pump station if required. Maintenance staff to attend site and rectify problem. Follow tasks outlined in section 10.



				Redundancy- All SPS have two pumps where only one is required to keep up with dry weather flows.	
Sewer pump station failure due to blockage in pumps	Likely	Minor	Medium 12	Redundancy- All SPS have two pumps where only one is required to keep up with dry weather flows. Mechanical/Electrical preventative maintenance program. Onsite emergency storage. Out of hours' staff roster (including on call fitter and electrician). Telemetry System.	Monitor pump station on telemetry system. Organise tankers to pump down pump station if required. Maintenance staff to attend site and rectify problem. Follow tasks outlined in section 10.
Bypass of Sewage Treatment due to Wet weather resulting in untreated or partially treated effluent discharge.	Unlikely	Minor	low 5	Telemetry system. Large wet weather storage for inflow diversion.	Notify re-use customers of incident, instruct them cease usage. Follow tasks outlined in section 10.



Bypass of Sewage Treatment due to power outage resulting in untreated or partially treated effluent discharge.	Unlikely	Moderate	Medium 9	Telemetry system. Generator onsite. Large wet weather storage for inflow diversion. Out of hours' staff roster (including on call fitter and electrician).	Notify re-use customers of incident, instruct them cease usage. Generator refuelled for prolonged outage. Follow tasks outlined in section 10.
Bypass of Sewage Treatment due to electrical/mechanical failure resulting in untreated or partially treated effluent discharge	Unlikely	Moderate	Medium 9	Telemetry system. Mechanical/Electrical preventative maintenance program. Ability to divert influent to wet weather storage. Out of hours' staff roster (including on call fitter and electrician).	Notify re-use customers of incident, instruct them cease usage. Maintenance staff to attend site and rectify problem. Follow tasks outlined in section 10.
Chemical Spill at Treatment Plant	Unlikely	Major	Medium 13	Chemical bunds and tanks have level alarms connected to SCADA. Chemical bunds provided for bulk chemical storage.	Maintenance staff contain and clean up spill as per the SDS. Follow tasks outlined in section 10.



Poor effluent quality due to failure of treatment process. This could be caused by poor quality raw sewage or illegal dumping.	Possible	Major	High 18	SDS and chemical manifesto available onsite. Trade Waste Monitoring program. Auto sampler on plant inlet works for influent quality benchmarking. Operational monitoring, processes for discharge of effluent/septic.	Notify re-use customers of incident, instruct them cease usage. Isolation/containment of contaminant and pump out where practical. Sewer staff to monitor treatment process and restore treatment process (re-seed etc.). Organise sampling of effluent as required by licence conditions. Follow tasks outlined in section 10.
Significant adverse environmental impact from irrigation in utilisation areas.	Likely	Minor	Medium 12	Re-use management plans. Site audits. Effluent quality monitoring.	Instruct re-use customer to cease usage. Follow tasks outlined in section 10.



6. Inventory of Potential Pollutants.

Table 6.1 details the chemicals stored at Moonee WRP to enable to sewer treatment process;

Table 6.1 Chemical Register

Chemical Name	Maximum Volume	Storage Method	SDS Location
Aluminium Sulphate	40,000L	Tank in Bund	Control Building
Sodium Hypochlorite	9,000L	Tank in Bund	Control Building
Diesel	750L	Generator fuel tank and bund	Control Building
Hydrated Lime	1000kg	Sludge room	Control Building
Polymer	1000kg	Sludge Room	Control Building

7. Safety Equipment

Table 7.1 is an inventory of the safety equipment which is readily available at Moonee WRP and sewer maintenance vehicles.

Table 7.1 Safety Equipment Register

Equipment	Location
Water Reclan	nation Plant
Ear/hearing protection	Sludge Room
Sun screen	Control Building
Apron/disposal overalls	Hypo Room
Rubber Gloves	Hypo Room
Safety glasses	Hypo Room
Gumboots	Amenities
Spill Kit	Laboratory
Steel capped Boots	Standard PPE
Gas monitor	Laboratory
Gas calibration equipment	Chemical loading areas
Emergency shower	Control building



First aid kit	
	Control Building Lunch Room
Bunds	Chemical storage areas
Alarms	Various
Fire blanket	Control Building Lunch Room
Fire extinguishers	Various – refer to maps
Fire detection	Various – refer to maps
Water & Sewerage retic	ulation response truck
Goggles/eye protection	On truck
Hearing protection	On truck
Apron/disposable overalls	On truck
Rubber gloves	On truck
Gumboots	On truck
Gas monitor	On truck
First aid kit	On truck
Fire extinguishers	On truck
Sun screen	On truck

8. Communicating with the Public

8.1 Communicating with Neighbours

The township of Moonee is approximately 2 km southeast of the Moonee WRP and the township of Emerald is approximately 4 km north of the Moonee WRP. These townships contain an extensive network of both gravity and pressure sewer pipelines and pump stations. Almost any property in these townships could be impacted by sewer overflow from the network. However, it is unlikely that any private property within the township would be impacted by an incident at the WRP.

The nearest neighbour from the Moonee WRP is approximately 500 metres uphill. There is nothing onsite that would create an emergency for any neighbours. If an incident were to occur at the WRP (such as a partially treated sewage overflow) the spill could make its way through bushland to the south of the plant and into tributaries of Skinners Creek, which joins Monee Creek.

If an incident did occur and any community members or neighbours were affected, then the processes listed in section 8.2 below would be implemented as required.



8.2 Communicating with the Local Community

This section details how the neighbours/community will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert).

Impacts on the community due to sewage network and treatment incidents are variable and depend on location, volumes of spills, weather, or other factors. Communication methods will be used on a case by case basis and in all situations Coffs Harbour City Council will attempt to provide early warning to directly affected premises by phone call or site visit. Early warning is to include details of what the incident is and how those affected can prepare and respond.

Where early warning is not possible Coffs Harbour City Council will provide notification and communication during and after an incident to advise those affected with information, advice and updates. Notification and communication methods will be determined on a case by case basis and the following methods may be used:

- Site visits/door knocking
- Phone calls
- Warning signs
- Media releases (radio/television/newspaper/internet/social media as required)
- Letter drops
- Other methods as the situation requires

In the event of a chemical or sewage spill into stormwater or waterway, Coffs Harbour City Council staff will go to prominent and/or high use areas of the affected waterway to advise users and erect signage. The signs are to warn water users of the contamination and advise them to avoid activities such as swimming, fishing, shell fish collection and boating until contamination has cleared.

Regular communication and notification is to be provided until the incident and clean-up of impacted site and affected areas has been complete (e.g. faecal coliforms have returned to background levels of <500cfu/100mL). Coffs Harbour City Council will take signs down and advise the public when regular activities can be resumed.

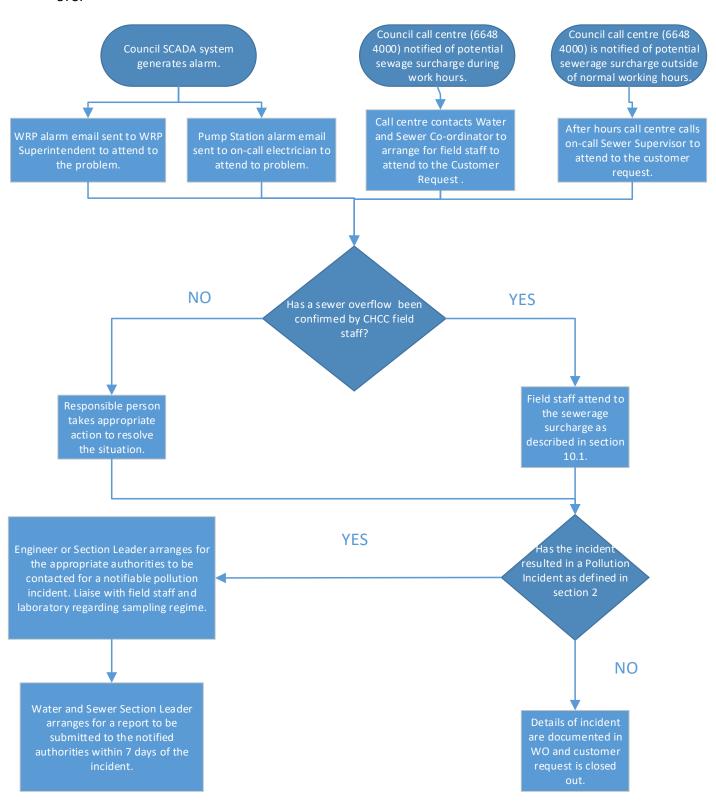
9. Minimising Harm to Persons on the Premises

There is a low risk of a pollution incident occurring on site that would harm the operational staff. PPE is provided for tasks involving exposure to raw/partially treated sewage. Hepatitis vaccinations are offered to all staff whose work involves potential contact with raw sewage. PPE and safety showers are provided for staff working with chemicals on site. In the event of an emergency, staff will gather at the Emergency Assembly Point.



10. Actions to be Taken During or Immediately After a Pollution Incident

The following flow chart details the procedure for responding to pollution incidents relating to EPL 573.





10.1 Immediate Actions Following Sewer Overflow in the Reticulation System

As soon as Coffs Harbour City Council is advised of a sewer overflow, operational staff will attend the site. Council staff will complete the following steps when attending to potential incident.

- 1. The source of the pollution shall be identified and isolated if possible.
- 2. Wastewater shall be prevented from contaminating additional land or water areas. This may require a bund where practicable.
- 3. The cause of the overflow will be rectified and the infrastructure returned to operation. This may involve clearing a sewer choke, pulling a pump or repairing a main.
- 4. If a Pollution Incident has occurred, attending staff will notify either the relevant Engineer or Section Leader, whom will then notify the relevant authorities and coordinate the incident recovery.
- Contaminated or possibly contaminated waterways shall be sampled (Laboratory sampling for faecal contamination) as soon as practical. Monitoring will continue until background levels of < 500 cfu/100ml.
- 6. Any pooling areas of wastewater will be removed via pump out or vacuum tanker where practical.
- 7. Any solid wastewater material which remains in open land or water areas shall be removed and disposed of to landfill.
- 8. Contaminated areas (not waterways) may be sprayed with a disinfecting agent in accordance with the manufacturer's instructions and Work Health and Safety considerations.
- 9. Depending on the extent and magnitude of the incident affected property owners, neighbours and the local community may be notified.

10.2 Immediate Actions Following a WRP Pollution Incident

As soon as the WRP Superintendent becomes aware of a potential overflow or pollution incident council staff will take the following steps.

- 1. Isolate or limit the source of pollution, wherever possible.
- 2. If a Pollution Incident has occurred, attending staff will notify either the relevant Engineer or Section Leader, whom will then notify the relevant authorities and coordinate the incident recovery.
- 3. Communicate with affected neighbours and the community, as required.
- 4. Implement remedial action, as appropriate and as required by the EPA.

11. Staff Training

The objectives of the training program shall be as follows:

- 1. To ensure that employees are knowledgeable of their roles and responsibilities concerning the plan.
- 2. To ensure that employees are knowledgeable of the plan's procedures to complete a safe and thorough response to pollution incidents.



3. To ensure that employees are knowledgeable of legislative requirements related to how pollution incidents are reported and managed.

All staff listed as contacts in Appendix B will be trained in this Pollution Incident Response Management Plan, and records of this training will be kept in Council's ECM system.

12. Testing and Updating the PIRMP

The PIRMP will be tested, reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring. Testing can be in the form of a desktop simulation or a practical exercise or drill.

Table 12.1 PIRMP Test Register

Date Tested	Participants	Details of test. Note: Testing must cover all components of the plan.	Outcomes of tests, including issues identified.	Next test date (within 12 months).
May 2020	Andrew Miller Angus Sharpe Sam Towndrow	Desktop simulation of effluent overflow at Moonee WRP.	No issues found.	May 2021
March 2021	Andrew Miller Samuel Hawkins Matthew Gittoes Sam Towndrow	Review and update following pollution incident (EPA ref: C02833-2021)	Procured new larger coloured signage to improve visibility. Response flow chart placed in vehicles for quick reference for reticulation staff	March 2022
March 2022	Michael Lynch Matt Gittoes	Desktop simulation of effluent overflow at Moonee WRP.	No issues found.	March 2023
March 2023	Sam Pinnuck Max den Exter	Desktop simulation of effluent overflow at Moonee WRP.	No Issues found	March 2024
March 2024	Jason Rolff Max den Exter	Desktop simulation of effluent overflow at Moonee WRP.	No Issues found	March 2025



Appendix A – Maps

Page left blank intentionally.

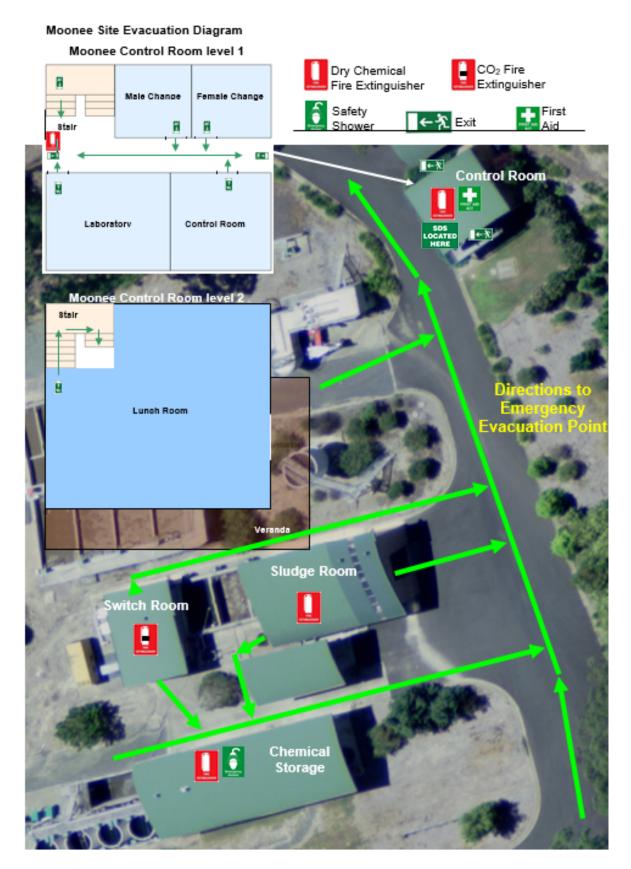


Moonee WRP - Site Layout





Moonee WRP Site Evacuation Plan



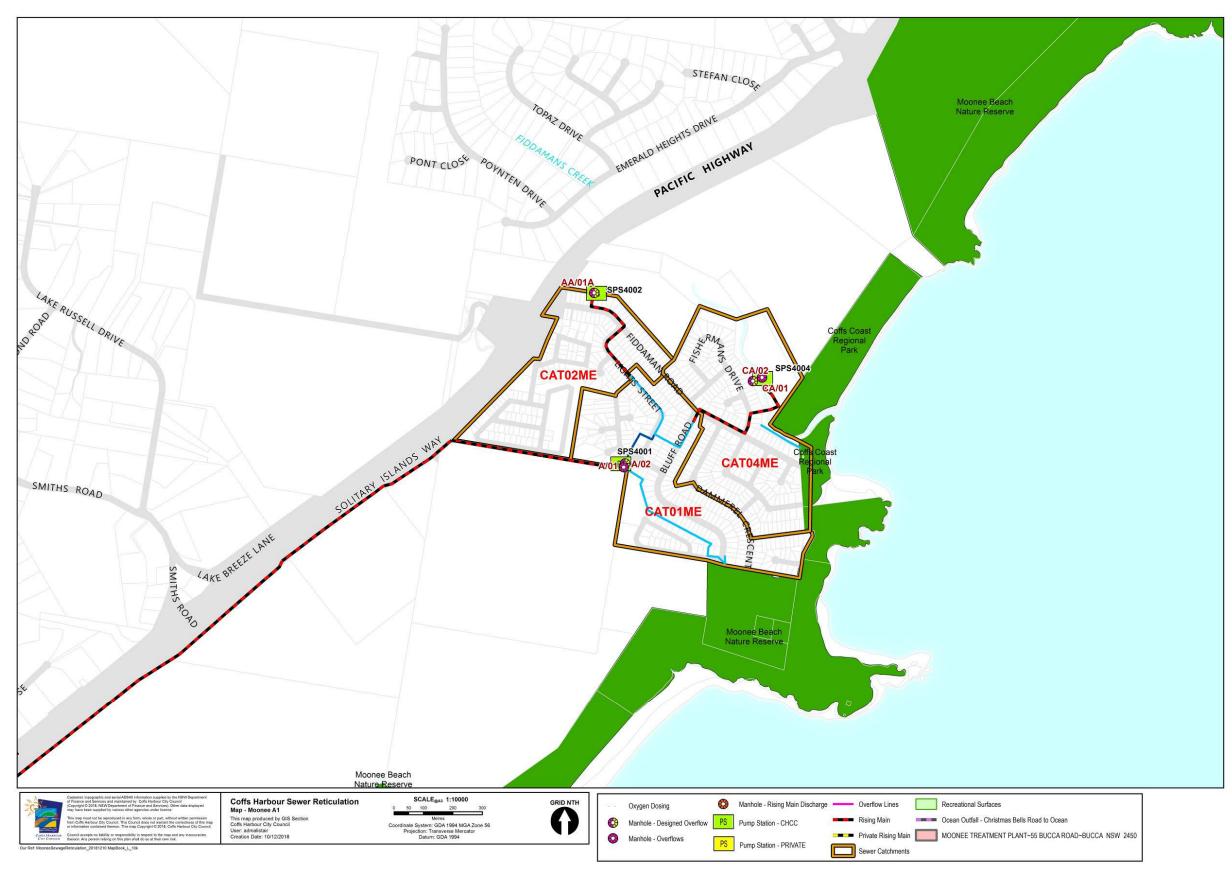


Moonee Sewer Reticulation System

Page left blank intentionally.

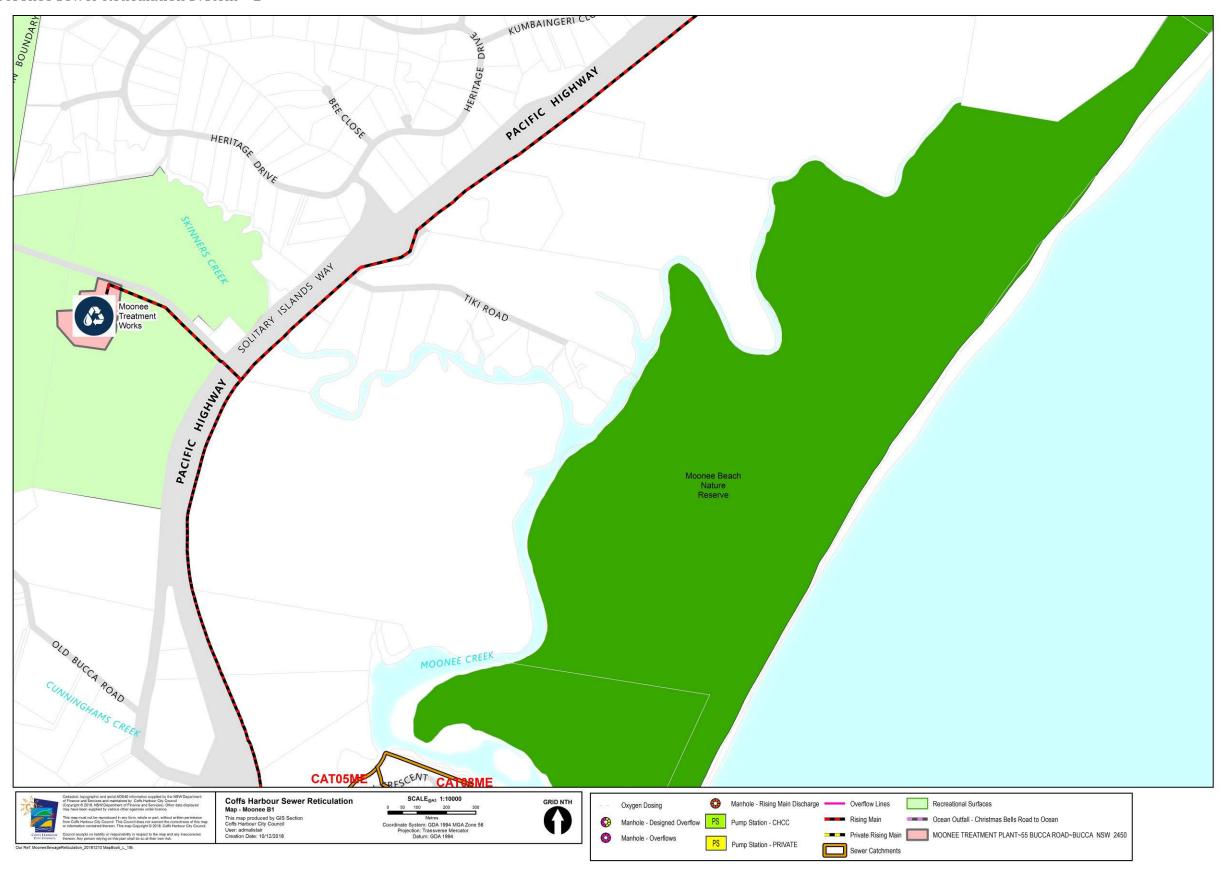


Moonee Sewer Reticulation System – 1



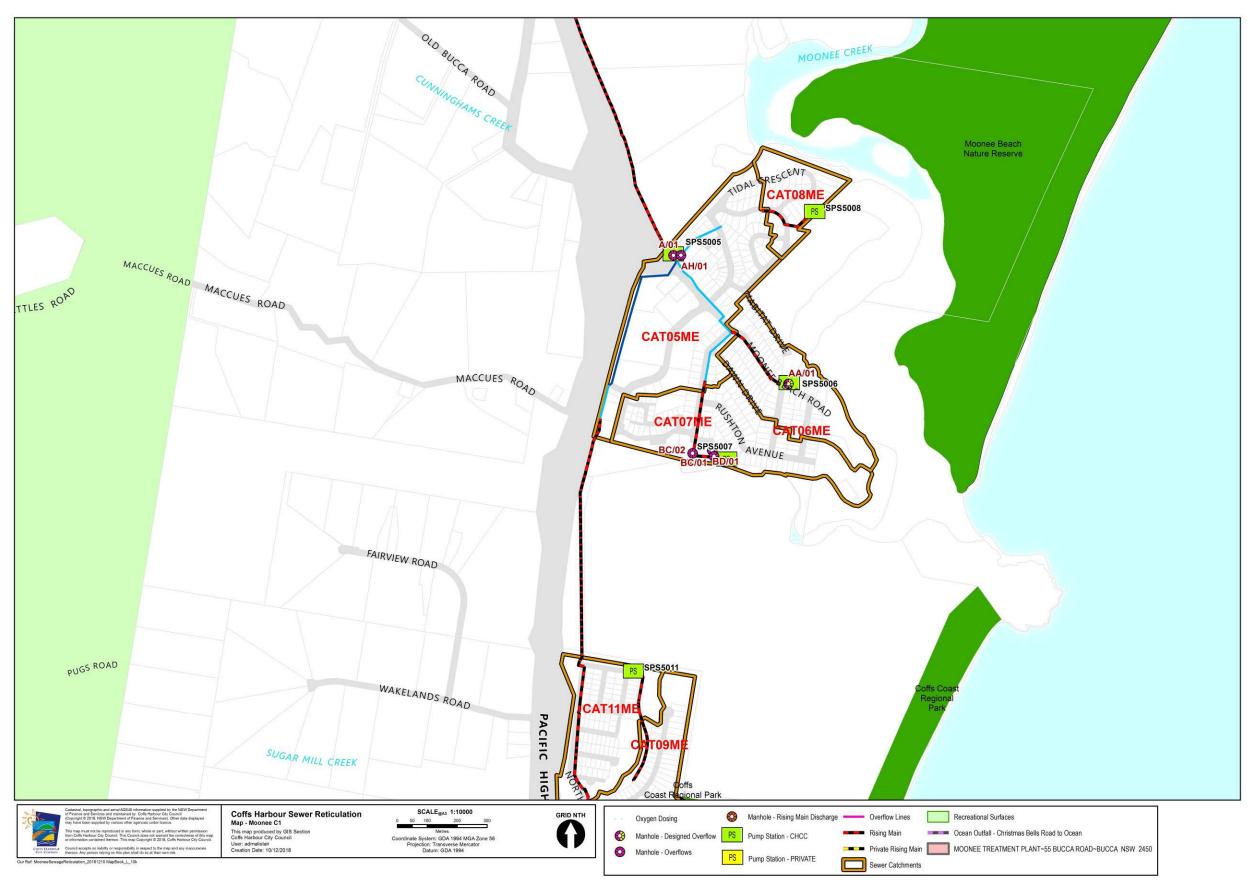


Moonee Sewer Reticulation System – 2



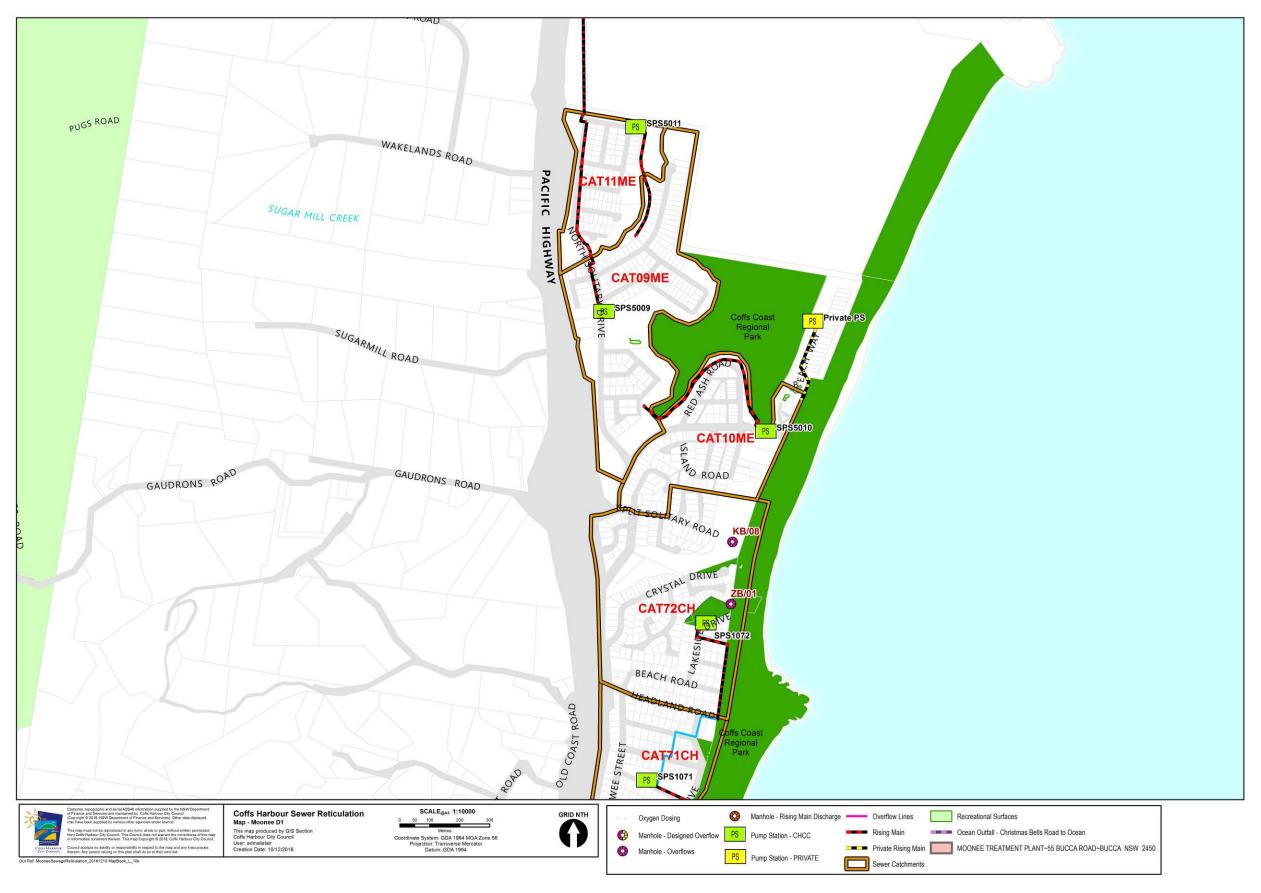


Moonee Sewer Reticulation System – 3





Moonee Sewer Reticulation System - 4





Appendix B – Council Contact List.

Name	Job Title	Contact Numbers	
Council Call Centre (24hrs)	Council Call Centre (24hrs)	02 6648 4000	
Jonathon Bell	Section Leader Water and	02 6648 4889	
	Sewer	0419 615 345	
Piers Everitt	Section Leader Mechanical and	02 6648 4455	
	Electrical Services	0409 159 741	
Matt Gittoes	Water and Sewer Engineer	02 6648 4453	
		0427 105 100	
Sam Pinnuck	Water and Sewer Engineer	0419 738 264	
Colin Cassell	Coordinator Maintenance	0427296922	
Roger Parkins	Supervisor Maintenance	0419 694 008	
	Repairs		
Jason Rolff	Superintendent WRP	0427 393 852	
	Woolgoolga		
Adam Henderson	Superintendent WRP Moonee	0427 956 394	
Warren Nazzari	Superintendent WRP Coffs	0418 670 449	
Benjamin Donkers	Leading Hand WRP	0429 815 219	
Ben Farrell	Leading Hand WRP	0419 633 647	



Appendix C – Coffs Harbour City Council Risk Assessment Matrix Page left blank intentionally.



CONSEQUENCE DEFINITIONS / TOLERANCE (SHADED BLUE)

C	OFFS HARBOUR CITY COUNCIL	
WHS	Risk Assessment To	ol

A Albert and market of				
Decision Escalation Protocol				
Residual Risk Rating	Action Required			
Extreme 23-25	This task shall not proceed. Unacceptable level of risk. Control measures would involve eliminating, substituting, isolating or engineering out the source of risk from the activity or equipment. If, after additional controls are put in place, the rating remains Extreme, the task shall not proceed.			
High 14-22	Unacceptable level of risk. If the consequence level is lower than Major, escalate to the Section Leader (or equivalent in business units) or their Delegate for further controls measures and decision making. If the consequence level is Major or Catastrophic, the task shall not proceed.			
Medium 6-13	Unacceptable level of risk. Escalate to the People Leader for further control measures and decision making			
Low 1-5	Acceptable level of risk. Accordingly, no further action is necessary. However, if there are controls which can be initiated that are easy and inexpensive, they can still be administered.			

LIKELIHOOD DEFINITIONS			
Frequency	Probability		
more than once in a year	> 50% chance		
once in 1 or 2 years	25% - 50%		
at least once in 2 – 10 years	10% - 25%		
less than once in 15 years	5% - 10%		
less than once in 20 years	<5%		

ool	Insignificant	Minor	Moderate	Major	Catastrophic
Strategic Objectives (e.g. Community Strat Plan & Delivery Prog objectives)	Negligible impact on strategic objectives	Manageable impact on strategic objectives	Variation to strategic objectives required	Requirement to revisit strategic objectives	Unable to deliver strategic objectives
Service Delivery / Operational (e.g. Operational & Business Plan objectives)	No noticeable impact on operational functions No noticeable impact on delivery of service to the community	Short-term disruption to operational functions Short-term impact on delivery of service to the community	Significant disruption to operational functions Significant delays to delivery of service to the community	Extended significant disruption to operational functions Extended significant delays to delivery of service to the community	Collapse of operational functions Total failure of service to the community
Financial	Loss of <\$25k or <2% of budget (whichever is less)	Loss of \$25k -\$249k or 2-5% of budget (whichever is less)	Loss of \$250k-\$499K or 5-10% of budget (whichever is less)	Loss of \$500k -\$1m or 10-25% of budget (whichever is less)	Loss of >\$1m or >25% of budget (whichever is less)
Environment & Heritage	Negligible environmental or heritage harm	Minor environmental or heritage harm within existing approvals and no compliance impact	Short term environmental or heritage harm and no compliance impact	Long term environmental or heritage harm and/or non-compliance	Irreparable long term environmental or heritage harm and compliance sanction
Environment & Heritage Compliance (Legal, Regulatory, Contractual)	No statutory or regulatory breach, no warning, no penalty Negligible legal consequences No breach of contract	Statutory or regulatory breach with warning issued Potential for litigation with likely favourable outcomes Contract breach with no impact	Statutory or regulatory breach and moderate fines Likely litigation with uncertain outcomes Contract breach with manageable penalties	Serious statutory or regulatory breach with fines and public exposure Litigation with probable negative outcomes Contract breach with penalties that cannot be absorbed within current budget	Significant statutory or regulatory breac resulting in staff dismissal Significant adverse judgement Contract breach with penalties that may result in significant damage to Council
Reputation	Adverse impact that can be remedied immediately	Adverse impact that is short-term	Adverse impact with potential for medium-term reputational and/or political damage	Impacts requiring long-term remedial attention Lasting damage to reputation and/or political standing	Irreversible political damage to brand and reputation
Human	Potential for injury or illness requiring first aid treatment	Potential for injury or illness resulting in medical attention	Potential for injury or illness resulting in medical attention and lost time	Potential for serious long-term injury or illness and/or hospitalisation and/or reportable incident report to regulators	Potential for death, permanent disability or ill-health

				Consequence		\longrightarrow
		Insignificant	Minor	Moderate	Major	Catastrophic
1	Almost Certain	Medium 11	High 16	High 20	Extreme 23	Extreme 25
QQ.	Likely	Medium 7	Medium 12	High 17	High 21	Extreme 24
ELIK	Possible	Low 4	Medium 8	High 14	High 18	High 22
Ĭ	Unlikely	Low 2	Low 5	Medium 9	Medium 13	High 19
1	Rare	Low 1	Low 3	Medium 6	Medium 10	High 15