



# Pollution Incident Response Management Plan

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# 1. Purpose

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The purpose of this Pollution Incident Response Incident Management Plan (**PIRMP**) is to describe the management, procedures and controls that will be implemented to manage pollution incidents at the United Wambo Open Cut Coal Mine (**United Wambo**).

# 2. Scope

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The PIRMP outlines the notification and reporting obligations for holders of an Environmental Protection Licence (EPL) in response to a pollution incident. As the holder of EPL 3141, United Collieries Pty Ltd (**United**) is required to prepare, keep, test and implement a PIRMP. The specific requirements for PIRMPs are set out in Part 5.7A of the *Protection of the Environment Operations Act 1997* (**POEO Act**) and Part 4 of the *Protection of the Environment Operations (General) Regulation 2022* (**POEO(G) Reg**). In summary, this legislation requires the following:

- holders of EPLs must prepare a PIRMP in accordance with s 153A of the POEO Act
- the plan must include the information detailed in s 153C of the POEO Act and cl 72 and cl 73 of the POEO(G) Reg and be in the form required by cl 71 of the POEO(G) Reg
- licensees must keep the plan at the premises to which the EPL relates in accordance with s 153D of the POEO Act
- licensees must test the plan at least every 12 months and after a pollution incident in accordance with cl 75 of the POEO(G) Reg
- if a pollution incident occurs in the course of an activity so that **material harm to the environment is caused or threatened** within the meaning of Part 5.7 of the POEO Act, licensees must immediately implement the PIRMP in accordance with s 153F of the POEO Act.

## 2.1 Site Details

United Wambo Joint Venture (**UWJV**) is a coal mining operation which operates under EPL 3141. UWJV is a joint venture between United (a joint venture between Abelsore Pty Limited (Glencore) (95 per cent) and the Mining and Energy Union (**MEU**) (five per cent)) and Wambo Coal Pty Limited (managed by Peabody). UWJV is located approximately 16 kilometres west of Singleton and approximately 8 kilometres south-east of Jerrys Plains in the Hunter Valley of New South Wales, see *Figure 2-1*.

The surrounding area, which may potentially be impacted by a pollution incident occurring at United Wambo in addition to the premises itself as shown in *Figure 2-2*, may include the following:

- landholders adjacent to the mine site
- downstream watercourses (including inundation areas and adjacent landholders): Redbank Creek and Wollombi Brook, both of which subsequently flow into the Hunter River
- Wambo and Hunter Valley Operations coal mines



Figure 2-1: Site Locality

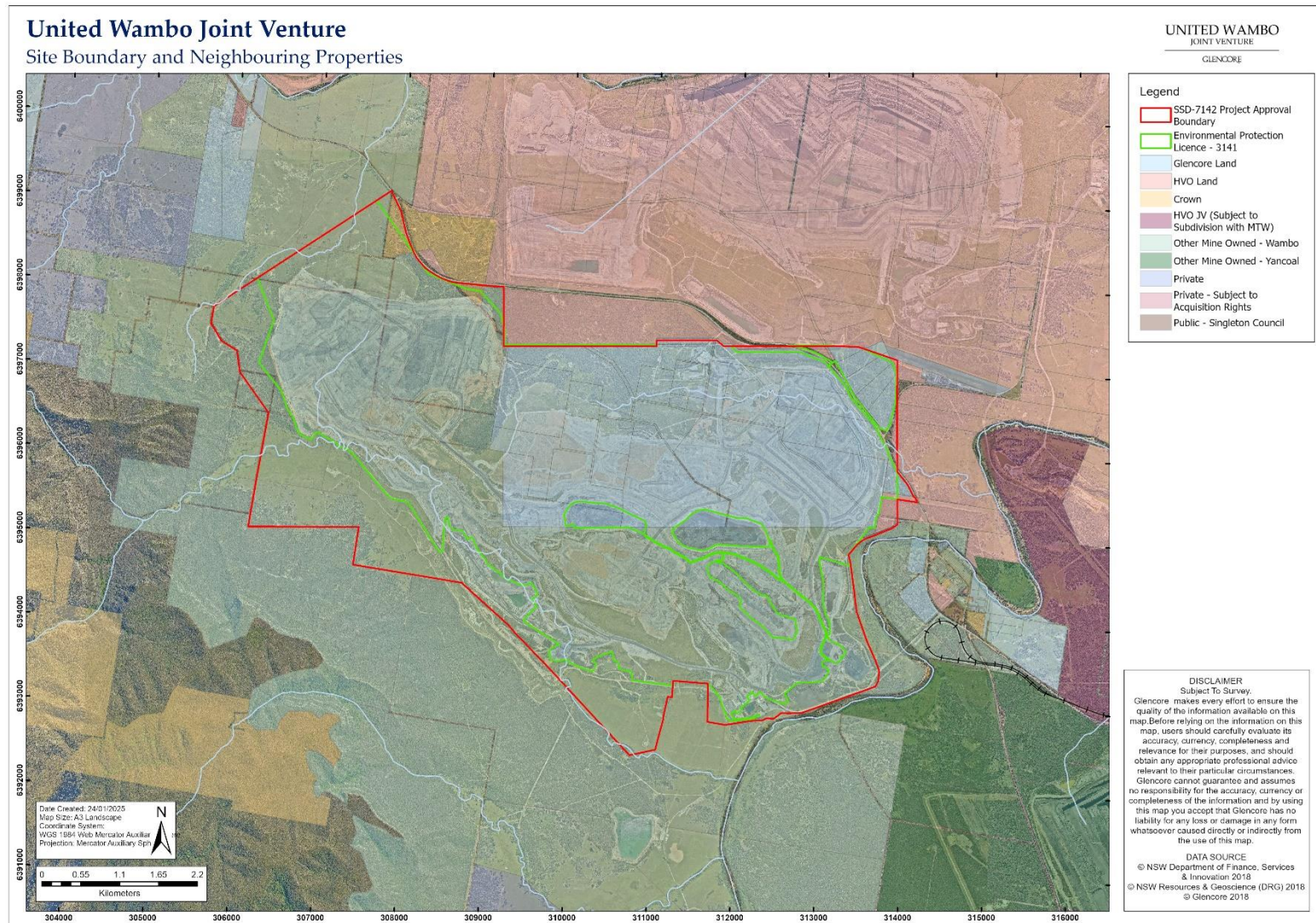


Figure 2-2: Site Boundary and Neighbouring Properties

## 3. Planning

### 3.1 Regulatory Requirements

Specific detail is required for inclusion in the PIRMP. **Table 3-1** lists information mandated under s 153C of the POEO Act, cl 72 and cl 73 of the POEO(G) Reg, and details where this information is located in this document.

*Table 3-1: Regulatory Requirements and Document Directory*

| Section/<br>Clause                                                        | Detail required                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Location in<br>document          |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| <b>Protection of the Environment Operations Act 1997</b>                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                  |
| <b>s 153C (a)</b>                                                         | The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to— the owners or occupiers of premises in the vicinity of the premises to which the EPL relates;<br><br>(i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and<br><br>(ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and<br><br>(iii) any persons or authorities required to be notified by Part 5.7, | <b>Section 4.6.2</b>             |
| <b>s 153C (b)</b>                                                         | A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Section 4.3</b>               |
| <b>s 153C (c)</b>                                                         | The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Section 4.6 and Section 7</b> |
| <b>Protection of the Environment Operations (General) Regulation 2022</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                  |
| <b>cl 72</b>                                                              | General licences—additional matters to be included in PIRM plan—the Act, s 153C<br><br>For the Act, section 153C(d), the following matters must be included in a PIRM plan—<br><br><i>(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),</i>                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Section 3.2</b>               |

| Section/<br>Clause | Detail required                                                                                                                                                                                                                                                                                                                 | Location in document                                                                                       |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
|                    | <i>(b) the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,</i>                                                                                                                                                                                    | <b>Section 3.2</b>                                                                                         |
|                    | <i>(c) details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of the relevant activity,</i>                                                                                                                                                         | <b>Section 3.2 &amp; Section 3.3</b>                                                                       |
|                    | <i>(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,</i>                                                                                                                                                                                                                  | <b>Section 3.3</b>                                                                                         |
|                    | <i>(e) the maximum quantity of a pollutant likely to be stored or held at particular locations, including underground tanks, at or on the premises to which the licence relates,</i>                                                                                                                                            | <b>Section 3.3</b>                                                                                         |
|                    | <i>(f) a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident,</i>                                                                                                                                                 | <b>Section 4.3</b>                                                                                         |
|                    | <i>(g) the names, positions and 24-hour contact details of individuals who—</i><br><i>(i) are responsible for activating the PIRM plan, and</i><br><i>(ii) are authorised to notify relevant authorities under the Act, section 148, and</i><br><i>(iii) are responsible for managing the response to a pollution incident,</i> | <b>Section 7</b>                                                                                           |
|                    | <i>(h) the contact details of each relevant authority referred to in the Act, section 148,</i>                                                                                                                                                                                                                                  | <b>Section 4.6.1</b>                                                                                       |
|                    | <i>(i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near the premises to which the licence relates or where the scheduled activity is carried on,</i>                                                                                                     | <b>Section 4.6.2</b>                                                                                       |
|                    | <i>(j) the arrangements for minimising the risk of harm to persons who are on the premises or who are present where the scheduled activity is being carried on,</i>                                                                                                                                                             | <b>Section 4.3</b>                                                                                         |
|                    | <i>(k) a detailed map, or set of maps, showing the location of the premises to which the licence relates, the surrounding area likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of stormwater drains on the premises,</i>                                   | <b>Figure 2-1, Figure 2-2 and Figure 3-1</b><br><br>Note: no stormwater drains are located on the premises |
|                    | <i>(l) a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,</i>                                                                        | <b>Section 4.3</b>                                                                                         |
|                    | <i>(m) the nature and objectives of a staff training program in relation to the PIRM plan,</i>                                                                                                                                                                                                                                  | <b>Section 4.1</b>                                                                                         |

| Section/<br>Clause | Detail required                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Location in document |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|                    | <i>(n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Appendix A -</b>  |
|                    | <i>(o) the dates on which the PIRM plan is updated,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Section 9.3</b>   |
|                    | <i>(p) the way in which the PIRM plan must be tested and maintained.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Section 6.2</b>   |
| <b>cl 73</b>       | <p><b>3 Additional matters to be included in PIRM plan—the Act, s 153C</b></p> <p><i>(1) For the Act, section 153C(d), the following must be included in a PIRM plan for a relevant licence—</i></p> <p><i>(a) the names, positions and 24-hour contact details of each individual who is—</i></p> <p><i>(i) responsible for activating the PIRM plan, or</i></p> <p><i>(ii) authorised to notify relevant authorities under the Act, section 148, or</i></p> <p><i>(iii) responsible for managing the response to a pollution incident,</i></p> | <b>Section 7</b>     |
|                    | <i>(b) the contact details of each relevant authority referred to in the Act, section 148,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Section 4.6.1</b> |
|                    | <i>(c) a community engagement protocol that includes procedures for notifying people living or working near a pollution incident and keeping them informed of relevant matters,</i>                                                                                                                                                                                                                                                                                                                                                              | <b>Section 4.6.2</b> |
|                    | <i>(d) details of pre-emptive action required to minimise or prevent a risk of harm to human health or the environment arising out of the activity, including, as a minimum, action that complies with the requirements set out in the Protection of the Environment Operations (Waste) Regulation 2014, clauses 70, 72 and 73,</i>                                                                                                                                                                                                              | <b>Section 3.2</b>   |
|                    | <i>(e) the nature and objectives of a staff training program in relation to the PIRM plan,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Section 4.1</b>   |
|                    | <i>(f) the date on which the PIRM plan is tested and the name of the person who carried out the test,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Appendix A -</b>  |
|                    | <i>(g) the method for testing and maintaining the PIRM plan.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Section 6.2</b>   |

## 3.2 Major Hazards

The potential major hazards which have been identified for United include:

- spills (e.g. hydrocarbon, hazardous chemicals, etc) resulting in land contamination
- spills (e.g. hydrocarbon, hazardous chemicals, saline or sediment laden water, etc) resulting in water contamination

- major water discharge (e.g. dam failure)
- fire

The likelihood of environmental hazards occurring at United has been captured through the **Environment and Community Broad Brush Risk Assessment** (E&C BBRA). The purpose of the E&C BBRA is to identify significant environment and community hazards across the site, the risk they pose to operations and the controls necessary to effectively manage them. Management of impacts is prioritised according to the level of risk each hazard is assigned. The E&C BBRA outlines the identified hazards, potential impacts, risks and the controls employed to manage them. The E&C BBRA is prepared and reviewed annually in accordance with **GCAA Risk Management Standard**.

United implements site specific management plans and standards that have been developed to manage specific risks to persons, property, the environment and the community, including:

- **Environmental Management Strategy**
- **Erosion and Sediment Control Plan**
- **Environmental Monitoring and Reporting Procedure**

The systematic identification, assessment and management of foreseeable catastrophic (core) hazards is undertaken utilising the adopted Glencore Sustainable Development Guideline for Catastrophic (Core) Hazard Management - **GCAA Catastrophic Hazards**.

This process includes:

- identifying foreseeable hazards associated with United
- assessing HSEC risks using recognised analysis and evaluation methodologies
- implementing controls necessary to eliminate or reduce identified catastrophic (core) risks in accordance with the established hierarchy of controls for environmental management

### 3.3 Chemicals and Potential Pollutants

All chemicals stored at United are accompanied by the relevant Safety Data Sheets (SDS) as required by **Work, Health and Safety Regulation 2025**. United has access, via the site intranet, to ChemAlert 2, which provides the site with up-to-date information on chemicals which may be found and/or used at United, including SDS.

The facilities that store fuel, oil and hazardous chemicals have been designed in accordance with *Australian Standard (AS) 1940 – 2017 and AS 1596 – 2014*. Maximum inventories of hazardous materials at United are listed in the Schedule 11 Hazardous Chemicals submitted to the Resources Regulator and contained in **Table 3-2**. The chemical storage system has been designed to incorporate:

- impervious walls and floors
- sufficient capacity to maintain 110% of the volume of the largest tank (or 25% of the total volume stored in all tanks, whichever is greater)
- walls not less than 250 mm high
- floors graded to a collection sump

*Table 3-2: Pollutant Register*

| Pollutant Type            | Location                  | Capacity                   |
|---------------------------|---------------------------|----------------------------|
| LPG                       | Cylinder Store            | 270kg                      |
| LPG                       | South MIA                 | 4,800kg                    |
| Diesel                    | Southern Fuel Farm        | 950,000L                   |
| Diesel                    | Southern MIA              | 31,000L                    |
| Diesel                    | United Crib Hut           | 220,000L                   |
| Diesel                    | Explosive Reload Facility | 59,280L                    |
| Ammonium Nitrate          | Explosive Reload Facility | 140,000kg                  |
| Ammonium Nitrate Emulsion | Explosive Reload Facility | 180,000kg                  |
| Oils and Grease           | South Oil Store           | 32,000L (32 x 1,000L IBCs) |
| Oils and Grease           | South Oil Store           | 223,600L                   |
| Oils and Grease           | In-pit Fuel Farm          | 10,000kg                   |
| Oils and Grease           | South Fuel Farm           | 10,000kg                   |

Potential pollutants created as part of mining operations thus, excluded from registers, include:

- mine water (extracted from underground and open cut mine workings);
- sediment laden surface water runoff from disturbed areas; and
- effluent waste.

Figure 3-1 displays the location of potential pollutants including sediment dams, and fuel storage locations.

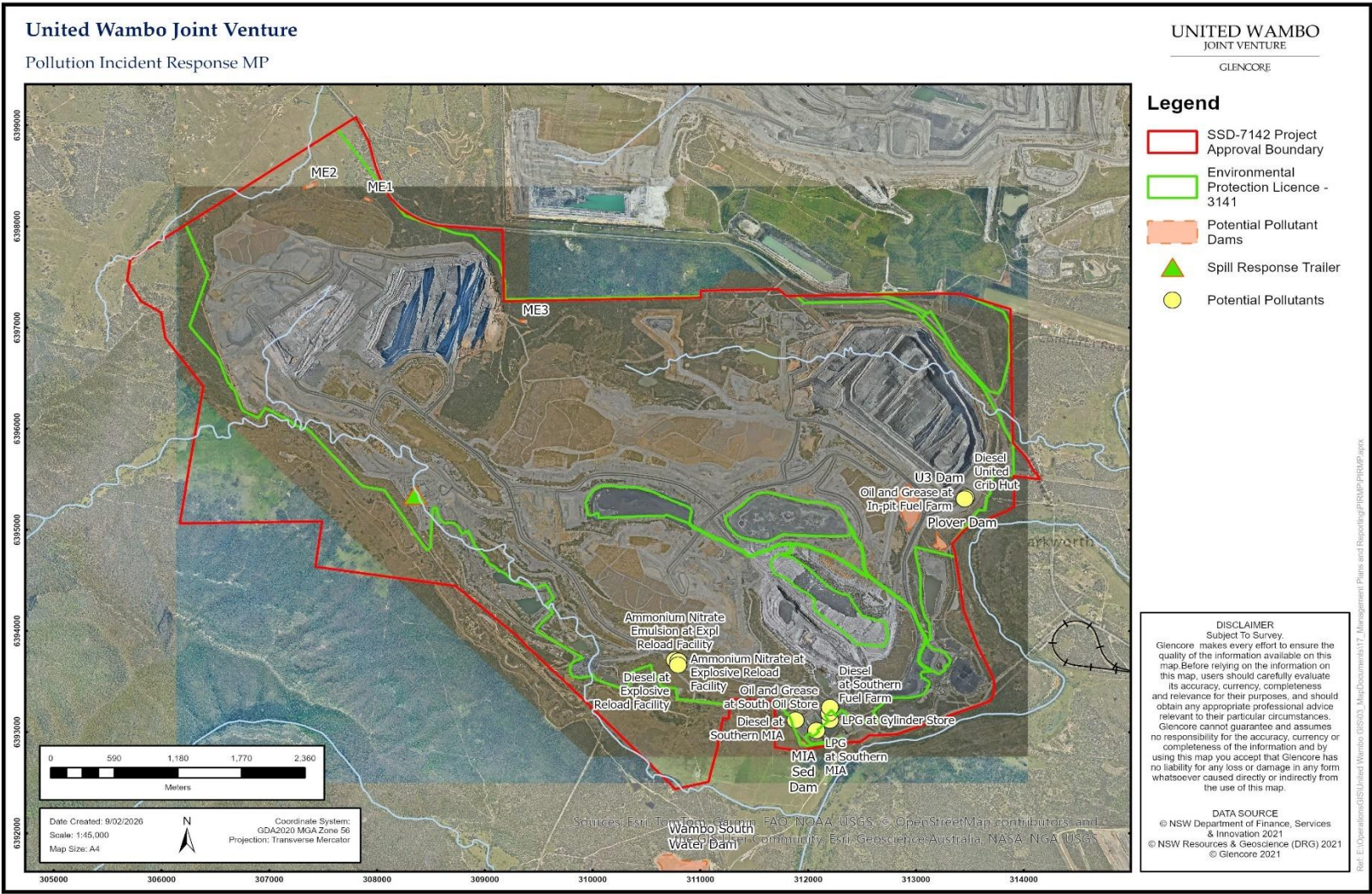


Figure 3-1 Potential Pollutant Locations

## 4. Implementation

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### 4.1 Training and Awareness

Effective implementation of this plan depends on the competency of the United Workforce and its Contractors.

Incident management, emergency response and the requirements of the PIRMP shall be included in all GCAA Generic Inductions and United Wambo Site Familiarisations.

Training is provided to relevant personnel in accordance with the site Training Needs Analysis and the Environmental Management Strategy (**EM Strategy**). For further details, refer to the **EM Strategy**.

### 4.2 Availability of the PIRMP

The PIRMP shall be kept in written form at the EPL premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) on request.

The PIRMP will be made publicly available within 14 days of finalisation (taken to be authorisation of the PIRMP by the Operations Manager) via the United website, in a prominent position and on a publicly available page.

No personal information (within the meaning of the Privacy and Personal Information Protection Act, 1998) will be made publicly available as part of the PIRMP.

### 4.3 Incident Management

A pollution incident is defined in the POEO Act as *“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”*.

In the case of an environmental incident, prior to any other action, the site must contact 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- provide for the safety of people at and within the vicinity of the site, and
- contain the pollution incident.

In compliance with **GCAA 6.0 Incident Standard**, the actions to be implemented at United Wambo on the occasion of an incident include the following:

- secure the scene and contain the incident
- gather information (i.e. environmental monitoring, photographs)
- determine the investigation level

- commence an Incident Cause Analysis Method (ICAM) (if required)
- review and classify information and determine actions
- complete actions
- trend analysis reports

Arrangements, including description and location of safety equipment for minimising risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident, are included in the following documentation:

- ***Emergency Management Plan***

The above management plan documents the roles and accountabilities of key personnel in the event of an incident.

Incident management at United Wambo focuses on actions to:

- secure and assign necessary tactical response resources, including equipment and/or personnel to minimise the environmental impacts associated with the incident
- establish that tactical response operations are carried out in a safe, well-organised, legal and effective fashion
- provide for the safety and welfare of all responders, employees, contractors and visitor
- continuously assess the incident to determine the adequacy of tactical response operations and the need for assistance from the GCAA Crisis Management Team
- manage stakeholders arriving at site
- minimise effects on people, the environment, property, production, and company reputation
- implement an environmental monitoring program to quantify impacts as a result of the incident as well as to be used as the basis to notify adjacent landholders and downstream water users as to whether avoidance or remediation measures are required
- interact, as appropriate, with GCAA personnel

With regards to the specific major hazards identified in **Section 3.2**, the following incident procedures and plans have been developed:

- ***Emergency Management Plan***
- ***Erosion and Sediment Control Management Plan***
- ***Spill Response Procedure***

All United Wambo employees and contractors receive emergency preparedness and response training during their site familiarisation induction. Controls of personal protective equipment and incident containment and control equipment are detailed in the risk assessment documents listed in **Section 3.2**. This includes but is not necessarily limited to:

- emergency spill kits
- portable pumping infrastructure
- earthmoving plant
- erosion and sediment control materials

United has limited authority to undertake pollution management activities on private property, or outside the site boundary and, in such cases, will liaise directly and provide appropriate assistance to the relevant authority and emergency services.

## 4.4 Determination of Material Harm

Following containment of the incident, immediate action must be taken to determine if the incident can be classified as a ‘**material harm incident**’, i.e. considered to be causing or threatening material harm. As defined by s 147 of the POEO Act, a **material harm incident** has occurred if the incident:

- involves **actual or potential harm** to the health or safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss (including all 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) or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations).

It is possible for a material harm incident to occur on land that is within the boundary of the EPL.

The determination of a material harm incident will be made by the Operations Manager in consultation with the Environment and Community Manager. If the Operations Manager is not available immediately, the determination will be made by the Environment & Community Manager.

## 4.5 Legal Duty to Notify

All United employees and contractors are responsible for alerting management personnel to all environmental incidents or hazards which may result in environmental harm or the potential to cause environmental harm, regardless of the nature or scale.

Notification responsibilities are detailed in s 148 of the POEO Act, which encompasses all site personnel, including contractors and sub-contractors. These can be categorised broadly as:

- the duty of an employee or any person undertaking an activity:  
Any person engaged as an employee or undertaking an activity (at the licensed premises) must, immediately after becoming aware of any potential incident, notify their relevant manager of the incident and all relevant information about it. This is to be undertaken as per **Section 4.6.1**; and
- the duty of the employer or occupier of a premises to notify:  
An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake immediate notification to the appropriate regulatory authority of any “**material harm incidents**”, including relevant information. Notification shall be undertaken by the Environment & Community Manager or Operations Manager as per **Section 4.6.1**.

## 4.6 Notification Procedures

### 4.6.1 Internal and External Notification

As discussed in **Section 4.5**, notification of an environmental incident is the responsibility of all site and contractor personnel.

In the instance of identification of an environmental incident or hazard, the personnel will report the issue immediately to their manager, who, in turn, shall report it to the Environment and Community Manager, or any member of the environmental team. 'Immediately' is taken to mean 'promptly and without delay'. **As per guidance provided by the EPA, the decision on whether to notify the incident in accordance with Part 5.7 of the POEO Act should not delay immediate actions to provide the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe to do so<sup>1</sup>.**

The agencies listed in **Table 4-1** must be contacted in the order outlined below.

After initial notification of any material harm incident, it will be the responsibility of the Environment and Community Manager to liaise with the authorities listed in **Table 4-1** or any authority that is providing directions for management of the material harm incident and provide any additional information that is required or requested. This may include incident investigation reports and ongoing environmental monitoring results. Within seven days of the occurrence of a material harm incident, a written report outlining the details and management of the incident is to be provided to the Department of Planning, Housing and Infrastructure (DPHI) as required by SSD 7142.

Table 4-1: External Contact Details

| Agency                                                                                 | Contact Details                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fire and Rescue                                                                        | 000<br>(To be contacted first if the incident presents an immediate threat to human health or property and emergency services are required, or contacted last if emergency response is not required)<br>(02) 49023083 |
| Environmental Protection Authority (EPA)                                               | 131 555 Environment Line                                                                                                                                                                                              |
| Ministry of Health                                                                     | 1300066055; or (02) 4924 6477 (after hours - ask for Public Health Officer on call)                                                                                                                                   |
| SafeWork NSW                                                                           | 13 10 50                                                                                                                                                                                                              |
| Singleton Council                                                                      | (02) 6578 7290 (office hours)                                                                                                                                                                                         |
| Extra reporting requirements required by Development Approval SSD7142 and Mining Lease |                                                                                                                                                                                                                       |
| Dept Planning, Housing and Infrastructure (DPHI)                                       | (02) 6575 3400, and also in writing on the DPHI Major Projects Website                                                                                                                                                |
|                                                                                        |                                                                                                                                                                                                                       |

<sup>1</sup> EPA, *Frequently Asked Questions Regarding the Duty to Notify of a Pollution Incident* (30 August 2017) <FAQs duty to notify of a pollution incident (nsw.gov.au)>

| Agency                                                                                  | Contact Details |
|-----------------------------------------------------------------------------------------|-----------------|
| Resources Regulator<br>Mining, Exploration and<br>Geoscience with Regional<br>NSW (MEG) | (02) 4063 6666  |

#### 4.6.2 Notification to Local Landholders and Community

Community notification shall be undertaken at the determination of the Environment and Community Manager. Names and contact details of stakeholders, including local and downstream residents, are included in the **United Wambo Stakeholder Register**. The following notification methodology is proposed to be utilised as required:

- early warnings: same day telephone notification to landholders whom may be affected by the incident over the subsequent 24-hour period
- updates: follow-up phone calls to all landholders whom may have been notified by the initial early warning. Updates may be provided to the broader local community in affected areas via information sheets or newsletters, Community Consultative Committee meetings, United website and media statements
- priority will be granted to notification of sensitive premises in close proximity

Information provided to the community will be relevant to the incident and may include the following details:

- type of incident that has occurred
- potential impacts local landholders and the community
- site contact details
- advice or recommendations based on the incident type and scale

## 5. Measurement and Evaluation

### 5.1 Compliance Management

Compliance is an ongoing process and is conducted in accordance with the **EM Strategy** – which provides the process for planning and executing a compliance assurance program. The main compliance management process conducted by United Wambo include:

- workplace interactions and planned task observations
- inspections
- audits
  - o validation of monitoring data
  - o internal audits
  - o external audits

For further details, refer to the **EM Strategy**.

## 5.2 Record Keeping

All environmental monitoring data is maintained in accordance with the **EM Strategy** and maintained on the premise for a period of four years.

Record-keeping of incident details, including investigations and outcomes, will be undertaken in accordance with **6.0 Incident Standard**.

## 6. Review and Improvement

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### 6.1 Review of Risk

The risks associated with a potential pollution incident at United are assessed on an annual basis and recorded in the E&C BBRA.

### 6.2 Testing and Maintenance

The testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Testing shall be undertaken in the following ways:

- the PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training requirements
- a review of the PIRMP will occur every 12 months commencing from the date of authorisation by the United Operations Manager. Contact details in this document must be kept current at all times
- the PIRMP will be reviewed within one month from the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to provide the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner

Information to be retained regarding PIRMP testing includes:

- the manner in which the test was undertaken
- dates when the plan has been tested
- the person who carried out the testing
- the date and description of any update or amendment to the plan

PIRMP testing to be conducted in accordance with **GCAA PIRMP Test Record**. Records of testing are recorded in **Appendix A - PIRMP Testing History** and dates and description of updates to this plan are recorded in **Table 9-3**.

## 7. Accountabilities

The specific responsibilities associated with the management and implementation of the PIRMP are outlined in **Table 7-1** below.

*Table 7-1: PIRMP Contact Details*

| Name           | Contact details         | Position                          | Responsibility                                                                                                                                                                                                                                                                                                                                         |
|----------------|-------------------------|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nick Slater    | Mobile:<br>0438 700 794 | Operations Manager                | Responsible for authorising the PIRMP and all subsequent updates<br><br>Responsible for ensuring adequate resourcing for implementation of the PIRMP<br><br>Authorised to liaise with the relevant authority                                                                                                                                           |
| Aislinn Farnon | Mobile:<br>0429 306 208 | Environment and Community Manager | Responsible for undertaking notification as defined in this PIRMP<br><br>Responsible for managing the response to a pollution incident<br><br>Responsible for arranging testing and updating of the PIRMP<br><br>Responsible for notification and training of PIRMP<br><br>Responsible for coordinating communications with affected community members |

## 8. Acronyms and Definitions

**Table 8-1:** summarises the acronyms and definitions relating to this PIRMP.

*Table 8-1: PIRMP Acronyms and Definitions*

| Term     | Description                                            |
|----------|--------------------------------------------------------|
| DPE      | NSW Department of Planning and Environment             |
| DPHI     | NSW Department of Planning, Housing and Infrastructure |
| EPA      | NSW Environment Protection Authority                   |
| EPL 3141 | Environment Protection Licence 3141                    |
| SSD7172  | Development Consent SSD7142                            |
| MIA      | Mine Infrastructure Area                               |
| ESCP     | Erosion and Sediment Control Plan                      |

## 9. Document Information

Relevant legislation, standards and other reference information must be regularly reviewed and monitored for updates and should be included in the site management system. Related documents and reference information in this section provides the linkage and source to develop and maintain site compliance information.

### 9.1 Related Documents

Related documents, listed in **Table 9-1**, are *documents* directly related to or referenced from within this document.

Table 9-1: Related Documents

| Number               | Title                                                             |
|----------------------|-------------------------------------------------------------------|
| GCAA-625378177-10317 | 11.01 Annual Environment and Community Risk Assessments Procedure |
| GCAA-625378177-9992  | 6.0 Incident Standard                                             |
| UWOC-1689771511-498  | Emergency Management Plan                                         |
|                      | Environment and Community Broad Brush Risk Assessment             |
| UWOC-1689771511-360  | Environmental Management Strategy (EM Strategy)                   |
| UWOC 1689771511-1084 | Environmental Monitoring and Reporting Procedure                  |
| GCAA-625378177-13271 | GCAA Catastrophic Hazards                                         |
| GCAA-625378177-2844  | GCAA Risk Management Standard                                     |
| UWOC-1796953183-3    | Erosion and Sediment Control Plan                                 |
| GCAA-625378177-10354 | PIRMP Test Record                                                 |
| UWOC-1689771511-961  | Spill Response Procedure                                          |
|                      | United Wambo Stakeholder Register                                 |

### 9.2 Reference Information

Reference information, listed in **Table 9-2**, is *information* that is directly referred to for the development of this document or referenced within this document.

Table 9-2: Reference Information

| Reference | Title                                                                             |
|-----------|-----------------------------------------------------------------------------------|
| NSW EPA   | Protection of the Environment Operations Act 1997 (POEO Act)                      |
| NSW EPA   | Protection of the Environment Operations (General) Regulation 2022 (POEO (G) Reg) |

| Reference   | Title                                                                                 |
|-------------|---------------------------------------------------------------------------------------|
| NSW EPA     | Environmental Guidelines: Preparation of Pollution Incident Response Management Plans |
| Legislation | Work Health and Safety Regulation 2025                                                |

## 9.3 Change Information

Details of the document history are recorded in the document control register, by version. A summary of the changes since the last EPL variation is provided in **Table 9-3**.

*Table 9-3: Change Information*

| Date of Update | Name of Personnel Undertaking Review | Summary of Changes<br>(Include brief detail and section number)                                                                                                      |
|----------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 15/03/2022     | Sean Pigott                          | Update following EPL variation (Dec 2021), SSD 7142 Mod 1 approval and incidents on 7 and 8 March 2022. Minor changes made.                                          |
| 13/03/2023     | Aislinn Farnon                       | Updated to change DPIE to DPE, removed Tailings Dams as they have been capped, Coffe Dam has been removed, updated all plans and pollutant register and minor edits. |
| 14/03/2024     | Aislinn Farnon                       | Updated to change DPE to DPHI, updated all plans, pollutant register and minor edits.                                                                                |
| 24/10/2024     | Aislinn Farnon                       | Updated Table 2-2, Table 5-1 and minor edits.                                                                                                                        |
| 24/01/2025     | Aislinn Farnon                       | Update to POEO(G) Reg 2022, document framework updated in line with ISO14001.                                                                                        |
| 04/02/2026     | Aasish Sabu Chitteth                 | Updated Table 3-2 Pollutant Register, Figure 3-1 Potential Pollutant Locations and minor edits.                                                                      |
| 12/02/2026     | Melanie Paul                         | Updated reference to Work Health and Safety Regulation to 2025 and added to section 9.2                                                                              |

## Appendix A - PIRMP Testing History

| Date       | Review Team          | Nature of the Test  | Actions                                                                                                                |
|------------|----------------------|---------------------|------------------------------------------------------------------------------------------------------------------------|
| 17/09/2020 | Sean Pigott          | Simulated Emergency | Simulated emergency conducted at United Wambo to test effectiveness of PIRMP. Deemed to be suitably followed.          |
| 02/02/2021 | Sean Pigott          | Desktop Review      | Review of PIRMP following incident on 4 January 2021. Minor changes made.                                              |
| 15/03/2022 | Sean Pigott          | Desktop Review      | Updated figures to show new EPL boundary, pollutant inventory and locations, reference documents, notifications table. |
| 13/03/2023 | Aislinn Farnon       | Desktop Review      | Updated to remove Tailings Dams and Coffey Dam and updated all plans and pollutant register.                           |
| 14/03/2024 | Aislinn Farnon       | Desktop Review      | Minor text edits, updated to change DPE to DPHI, updated all plans, pollutant register.                                |
| 24/01/2025 | Aislinn Farnon       | Desktop Review      | Update to POEO(G) Reg 2022, document framework updated in line with ISO14001.                                          |
| 04/02/2026 | Aasish Sabu Chitteth | Desktop Review      | Update to pollutants register and figure showing potential pollutant locations on site.                                |