



Pollution Incident Response Management Plan

(in case of a pollution event refer to Figure 1)

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1. Introduction

The Pollution Incident Response Management Plan (PIRMP) outlines what the notification and reporting obligations are in response to a pollution incident. Holders of an environmental protection licence (EPL) must prepare and implement a PIRMP in accordance with Section 153A of the *Protection of the Environment Operations Act 1997* (POEO Act). The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2022 (POEO(G) Regulation). In summary, this legislation requires the following:

- the holders of EPLs 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 the POEO(G) Regulation (clause 72) and be in the form required by the POEO(G) Regulation (clause 71);
- licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act); licensees must test the plan at least every 12 months and after a pollution incident in accordance with the POEO(G) Regulation (clause 75); and
- 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 plan (section 153F, POEO Act).

As the holder of EPL 563, the Bulga Coal Complex, incorporating Bulga Open Cut and Bulga Underground, is required to comply with the POEO Act; as such, this document has been developed to satisfy the PIRMP requirements documented above. This PIRMP includes the details and procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment.

While this PIRMP outlines how incidents of material harm will be addressed appropriately, this plan also includes notification and reporting procedures for water pollution incidents. Those enacting the PIRMP for water pollution incidents are to be aware of their follow-up requirements under EPL 563 (revised 19 September 2024) in the event that an incident is deemed to not be material harm. All water pollution incidents as defined by Section 120 of the POEO Act must be reported to the relevant authority.

The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act (see Section 4.1).

1.1 Regulatory Requirements

Specific detail is required for inclusion in the PIRMP. **Table 1** lists information mandated under Section 153C of the POEO Act and clause 72 of the POEO (General) Regulation 2022 and details where this information is located in this document.

Table 1 - Document Directory

Section 153C	Detail Required	Location in PIRMP
(a)	The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to:	

Section 153C	Detail Required	Location in PIRMP
	<ul style="list-style-type: none"> (i) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates; (ii) The local authority for the area in which the premises to which the EPL relates are located and any area affected, or potentially affected, by the pollution; and (iii) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act). 	<p>Section 4.4</p> <p>Section 4.3</p> <p>Section 4.3</p>
(b)	A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant EPL to reduce or control any pollution.	Section 3
(c)	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.	Section 4.3
(d)	Any other matter required by the regulations	Section 1.3
Protection of the Environment Operations (General) Regulation 2022		
72 (a)	<i>A description of the hazards to human health or the environment associated with the activity to which the licence relates (the “relevant activity”).</i>	Section 1.3 Appendix G -
72 (b)	<i>The likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood.</i>	Section 1.3 Appendix G
72 (c)	<i>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>	Section 1.5
72 (d)	<i>An inventory of potential pollutants on the premises or used in carrying out the relevant activity.</i>	Section 1.4 Appendix B -and Appendix C -
72 (e)	<i>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>	Section 1.4 Appendix B
72 (f)	<i>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>	Section 1.3 Section 3 Appendix D -

Section 153C	Detail Required	Location in PIRMP
72 (g)	<i>The names, positions and 24-hour contact details of individuals who:</i> <i>(i) are responsible for activating the PIRM Pplan;</i> <i>(ii) are authorised to notify relevant authorities under section 148 of the POEO Act, and</i> <i>(iii) are responsible for managing the response to a pollution incident.</i>	Section 2.2
72 (h)	<i>The contact details of each relevant authority referred to in section 148 of the POEO Act.</i>	Section 4.3 Section 4.4
72 (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>	Section 4.4
72 (j)	<i>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>	Section 3
72 (k)	<i>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>	Appendix A Appendix B Appendix C Note: no stormwater drains are located on the premises
72 (l)	<i>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>	Section 3
72 (m)	<i>the nature and objectives of a staff training program in relation to the PIRM plan.</i>	Section 5.1
72 (n)	<i>the dates on which the PIRM plan has been tested and the name of the person who carried out the test.</i>	Appendix E -
72 (o)	<i>the dates on which the PIRM plan is updated.</i>	Section 7.1
72 (p)	<i>the way in which the PIRM plan must be tested and maintained.</i>	Section 5.2
74 (1)	<i>A PIRM plan must be made readily available—</i> <i>(a) to an authorised officer on request, and</i>	Noted

Section 153C	Detail Required	Location in PIRMP
	<p>(b) to a person who is responsible for implementing the PIRM plan at the premises—</p> <p>(i) to which the relevant licence relates, or</p> <p>(ii) where the activity takes place.</p>	
74 (2)	<p>A PIRM plan must be made publicly available in the following way within 14 days after it is prepared—</p> <p>(a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan,</p> <p>(b) if the person does not have a website—by providing a copy of the PIRM plan, without charge, to a person who makes a written request for a copy.</p>	<u>Management plans</u>
75 (1)	<p>A PIRM plan must be tested—</p> <p>(a) routinely at least once every 12 months, and</p> <p>(b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.</p>	Section 5.2
75 (2)	<p>The test must be carried out in a way to ensure the following—</p> <p>(a) the information included in the PIRM plan is accurate and up to date,</p> <p>(b) the PIRM plan is capable of being implemented in a workable and effective way.</p>	Section 5.2
75 (3)	<p>A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.</p>	Section 5.2

1.2 Site Details

Bulga Coal Management Pty Ltd is the holder of EPL 563 for the Bulga Coal Complex (BCC). BCC comprises two coal mining operations being the Bulga Open Cut and the Bulga Underground. The Coal Handling and Processing Plant (CHPP) and rail loading facility are located in the eastern side of the site. In May 2018, Bulga Underground Operations ceased mining and the mine was sealed in July 2018.

The surrounding area which may be impacted by a pollution incident occurring at the BCC in addition to the premises itself includes the following:

- Landholders adjacent to the mine complex (refer to **Appendix A**).

- Downstream water courses (including inundation areas and adjacent landholders) which subsequently flow into the Hunter River:
 - Nine Mile Creek;
 - Loders Creek;
 - Monkey Place Creek; and
 - Wollombi Brook.
- Nearby localities.

1.3 Major Hazards

The potential major hazards relevant to this PIRMP which have been identified for the BCC 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 (for example dam or pipeline failure);
- Blast fume (e.g. blast fume containing NOx) leaving the EPL boundary
- Climate change related events, such as natural disasters (bushfires, floods, or major storm events);
- Fire (for example spontaneous combustion fires associated with coal stockpiles); and
- Explosions (for example blasting activities).

The likelihood of environmental hazards occurring at the BCC has been captured through the Environment and Community Risk Assessment (ECRA), with the management of impacts prioritised according to the level of risk each aspect is assigned. The ECRA is conducted annually in accordance with **GCAA-625378177-2844 Risk Management**. Copies of the Annual ECRA are saved in CMO (or other HSEC IS Compliance System) and the full risk assessment in Protecht. A summary of the primary hazards, including consequence, likelihood, residual risk and controls are shown in **Appendix G -**.

The BCC implements a site specific risk procedure (**BULOC-1104430715-2200 Risk Management**) developed to help identify, assess and manage risks to persons, property, the environment and the community.

The identification, assessment and management of foreseeable catastrophic (core) hazards is undertaken in accordance with Glencore Protocol **GCAA-625378177-13271 Catastrophic Hazards**.

This process includes:

- Identifying foreseeable hazards associated with operations at the BCC;
- Assessing sustainable development risks using recognised analysis and evaluation methodologies; and
- Implementing controls necessary to eliminate or reduce identified catastrophic (core) risks in accordance with the established hierarchy of controls for environmental management.

1.4 Chemicals and Potential Pollutants

All chemicals at the BCC are included in a central register ChemAlert (Chemical Safety Management System) available on the site intranet. ChemAlert allows to maintain stock registers, generate reports

of hazardous or dangerous chemicals, track inventory, identify storage incompatibilities, store Safety Data Sheets (SDS) and Personal Protective Equipment (PPE) required, among others.

The facilities that store fuel, oil, hazardous chemicals and dangerous goods have been designed in accordance with *Australian Standard (AS) 1940 – 2017* and *AS 1596 - 2014*. Maximum inventories of hazardous materials at BCC are listed in the Notification of Hazardous Chemicals on Premises (Acknowledgement HAZNOT0001098) issued by SafeWork NSW; and also available in the ChemAlert Register.

Explosives at BCC are stored in licensed explosive magazines in accordance with NSW SafeWork requirements. The Licence to Store Explosives XSTR100095 covers the storage of these materials.

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

- Mine tailings;
- Mine water (extracted from both underground and open cut mine workings);
- Sediment laden surface water runoff from disturbed areas; and
- Effluent waste.

These materials are in a constant state of flux as a result of mining operations. Risks associated with these potential pollutants are incorporated into the risk register detailed above.

Appendix B and **Appendix C** display the location of potential pollutants including tailings dams, sediment dams, pipelines, and fuel storage locations.

1.5 Pre-emptive Controls

BCC implements a number of controls to manage the Major Hazards identified in **1.3 Major Hazards**. Some of the controls include, but are not limited to:

- All BCC employees and contractors receive emergency preparedness and response training during their site familiarisation induction;
- BCC maintains a dedicated emergency response team who undergo regular training and operational drills;
- BCC has accessible personal protective equipment for staff and contractors;
- Spill containment and control equipment includes:
 - emergency spill kits;
 - portable pumping equipment;
 - earth moving equipment;
 - floating booms;
 - erosion and sediment control materials; and
 - shipping containers stocked with sandbags.
- Fire control systems, including water carts;
- Fire suppression on relevant mobile and fixed infrastructure;
- Hydrocarbon and chemical storage as per relevant Australian Standards;
- Realtime leak detection and monitoring for high risk pipelines;

- Realtime water level monitoring and alarm capabilities on high risk dams; and
- Pre-blast environmental assessment process utilising predictive forecasting for blasting activities.

BCC has limited authority to undertake pollution management activities on private property, or outside the site boundary and in such cases where an incident requires a response outside of BCC owned land, BCC will liaise directly and provide appropriate assistance to the relevant authority and emergency services. **Appendix D** - display the general location of spill control and emergency response equipment.

2. Management and Responsibilities

2.1 Legal Duty to Notify

BCC employees and contractors are responsible for alerting management personnel to all environmental incidents or hazards which may result in an environmental impact, regardless of the nature or scale.

Notification responsibilities are detailed in the *POEO Act 1997* (Section 148), which encompasses all site personnel, including contractors and sub-contractors. These can be categorised broadly as:

- The duty of employee or any person undertaking an activity:
Any person engaged as an employee or undertaking an activity (at the BCC) must, immediately after becoming aware of any incident that is believed to cause or threaten to cause material harm to the environment, notify their relevant manager of the incident and all relevant information about it. This is to be undertaken as per **Section 4.3**; 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 pollution incident, must undertake notification to the appropriate regulatory authority of any “material harm incidents”, including relevant information. Notification shall be undertaken by the Environment and Community Manager or delegate as per **Section 4.3**.

2.2 PIRMP Management

The specific responsibilities associated with the management and implementation of the PIRMP are outlined in **Table 2**.

Table 2 - PIRMP Management Responsibilities

Name	Contact Details	Position	Responsibility
Ralph Northey	0418 439 874	Environment and Community Manager – Bulga Complex	Responsible for undertaking notification as defined in this PIRMP. Responsible for managing the response to a pollution incident. Responsible for arranging testing and updating of the PIRMP.

Name	Contact Details	Position	Responsibility
			Responsible for notification and training of PIRMP. Responsible for coordinating communications with affected community members.
Murray Gregson	0447 886 810	Operations Manager – Bulga Complex	Responsible for authorising the PIRMP and all subsequent updates. Responsible for providing adequate resourcing for implementation of the PIRMP. Authorised to liaise with the relevant authority. Implementation of the PIRMP.
Open Cut Dispatch	6570 2484		To provide assistance and alert other people who may be in the vicinity of any incident.

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 Fire and Rescue (000) if the incident presents an immediate threat to human health or property. Fire and Rescue NSW are the first responders, as they are responsible for controlling and containing incidents. Where there is no threat to human health or services, Fire and Rescue NSW must still be contacted for information purposes, but as the last point of contact as detailed in **Section 4.3**.

All possible actions should be taken to control the pollution incident in order to minimise health, safety and environmental consequences. These actions, to the maximum extent possible, aim to:

- Provide for the safety of people at and within the vicinity of the site; and
- Contain the pollution.

In accordance with **BULOC-1104430715-2299 Hazard and Incident Management Procedure**, the actions to be implemented at the BCC in the event of an incident include the following:

1. Secure the scene and contain the incident
2. Determine if notification is required – refer to **Figure 1**.
3. Gather information (i.e. environmental monitoring)
4. Determine the investigation level

5. Commence an ICAM (if required)
6. Review and classify information and determine actions
7. Complete actions
8. Trend analysis reports

The emergency and incident response procedure is outlined in **BULOC-1104430715-1210 Emergency Management Plan**. The Emergency Management Plan outlines the roles and accountabilities of key personnel in the event of an emergency. Contact details for the incident management team are available on sharepoint on the **BULOC-1104430715-475 Bulga Incident Management Team Contact List**.

Incident management at the BCC 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 visitors;
- 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; and
- Interact, as appropriate, with GCAA personnel.

With regards to the specific major hazards identified in **Section 1.3**, the following emergency procedures have been developed:

Spills (e.g. hydrocarbon, hazardous chemicals, tailings etc) resulting in land and or water contamination;

- **BULOC-1104430715-26364 Emergency Response Manual**; and
- **BULOC-1104430715-26087 North Pit Tailings and Return Water – Leaking Pipe – Trigger Action Response Procedure**

Major water discharge (for example dam failure);

- **BULOC-1104430715-28449 CHPP Surge Dam Safety Emergency Plan**;
- **BULOC-1104430715-28373 Northern Water Dam Dam Emergency Plan**;
- **BULOC-110430715-28448 Northern Tailings Storage Facility Emergency Response Plan**;
- **BULCX-2103827161-4402 Water Management Plan**; and
- **BULCX-2103827161-7624 Erosion and Sediment Control Plan**.

Fire (for example, spontaneous combustion fires associated with coal stockpiles) and explosions (for example blasting activities);

- **BULOC-1104430715-26364 Emergency Response Manual**;

- **BULOC-1104430715-730 Spontaneous Combustion Management Plan;**
- **BULOC-1104430715-3353 Fire and Explosion Management Plan;**
- **BULOC-1104430715-27253 Gas Drainage Fire and Explosion Management Plan;** and
- **BULOC-1104430715-28557 Reload Facility Management Procedure.**

All BCC employees and contractors receive emergency preparedness and response training during their site familiarisation induction. The BCC maintains a dedicated emergency response team who undergo regular training and operational drills. Controls of personal protective equipment and incident containment and control equipment are detailed in safety data sheets for chemicals of concern, the relevant management plan detailed above and in the risk assessment documents listed in **Section 1.3**. These include but are not necessarily limited to:

- emergency spill kits, which are stored adjacent to major fuel storage locations (as shown in **Appendix D**);
- portable pumping infrastructure;
- earth moving plant;
- floating booms and silt curtains; and
- erosion and sediment control materials.

The BCC 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. Notification Procedures

4.1 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 Section 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 \$10,000.00 (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 and Community Manager.

In the event of an incident, response and notification must be undertaken as per **Figure 1**, which contains the following important information:

- the local authority for the area in which the premises to which the EPL relates;

- the persons and authorities to be notified by Part 5.7 of the POEO Act; and
- the contact details of each relevant authority referred to in section 148 of the POEO Act.

After initial notification of any material harm incident, it will be the responsibility of the Environment and Community Manager to liaise with any authority listed in **Table 3** that requests additional information, or is providing directions for management of the material harm incident. This may include incident investigation reports and ongoing environmental monitoring results.

4.2 Reportable Water Pollution Incidents

As defined by Section 120 of the POEO Act, a reportable pollution of waters is placing in or on, or otherwise introducing into or onto, waters (whether through an act or omission):

- any matter, whether solid, liquid or gaseous, so that the physical, chemical or biological condition of the waters is changed;
- any refuse, litter, debris or other matter, whether solid or liquid or gaseous that is likely to make the water unclean, noxious, poisonous or impure, and detrimental to the health, safety or welfare of persons, animals, aquatic life, birds, or livestock;
- any matter that is of a prescribed nature, description or class that does not comply with any standard prescribed in respect of that matter; and
- placing any matter in or in a position where it may fall, descend, be washed into the path of water (creek, drain, gutter) thus polluting the waters.

‘Prescribed matter’ which the above definition has been based on can be found in **Appendix F** -.

Following a pollution of waters incident, the Environment and Community Manager/delegate must report the details as per condition R4 of EPL 563, schedule 5 condition 7 of SSD 4960 and schedule 6 condition 7 of DA 376-8-2003 through:

- Telephone communication to the EPA Environment Line on 131 555 immediately;
- Provide written details of the notification to the Department of Planning Infrastructure and Housing (DPHI) via the Major Projects Portal immediately; and
- Provide written details of the notification to the EPA at hunter.region@epa.nsw.gov.au within 7 days of notification.

4.3 Internal and External Notification

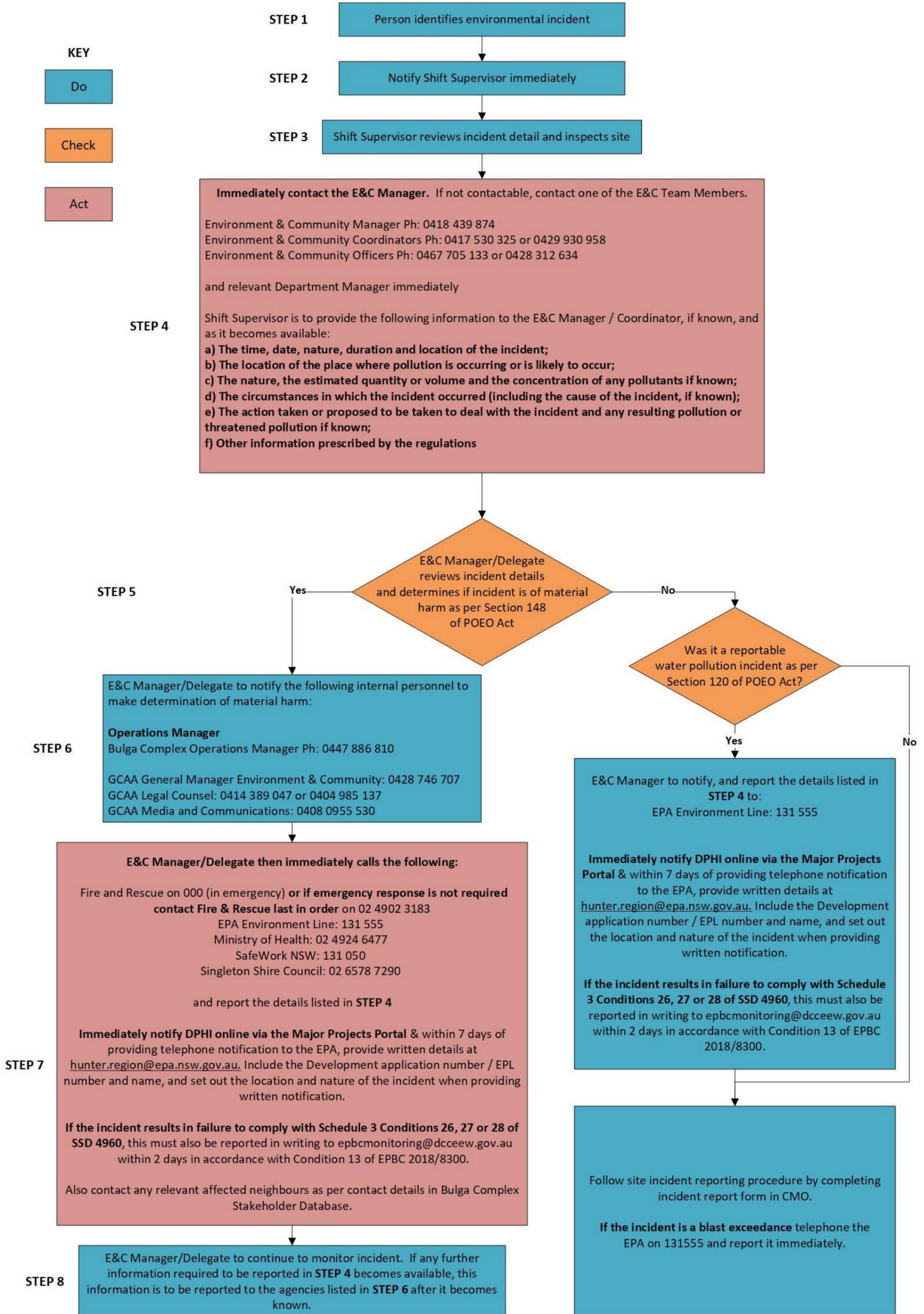
As discussed in **Section 2.1**, notification of an environmental incident is the responsibility of all site and contractor personnel. In the instance of identification of an environmental incident or hazard, personnel will report the issue immediately to their manager or Task Coordinator, who in turn shall report it immediately to the Environment and Community Manager, or any member of the environmental team. Immediately is taken to mean ‘promptly and without delay’¹.

¹ EPA, *Frequently Asked Questions Regarding the Duty to Notify of a Pollution Incident* (last updated 14 July 2021) <<http://www.epa.nsw.gov.au/legislation/poefaqsnofity.htm>>

Table 3 - Notification Contacts

Agency	Contact Details
Fire and Rescue	<p>If the incident presents an immediate threat to human health or property and emergency services are required: 000</p> <p>If emergency response is not required (contact Fire and Rescue last in order): (02) 4902 3183</p>
EPA	131 555
Ministry of Health	<p>Work Hours: (02) 4924 6477</p> <p>After Hours: (02) 4924 6477 (Diverts to John Hunter Hospital – ask for Public Health Officer on call)</p>
SafeWork NSW	13 10 50
Singleton Shire Council	(02) 6578 7290

Figure 1: Environmental Incident Response Notification Flow Chart



In the instance of identification of an environmental incident or hazard, the personnel will report the issue immediately to their Shift Supervisor/Task Coordinators, 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'. The decision on whether to notify of 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 so².

In addition to being detailed in this document, procedures for undertaking internal and external notification are included in:

- **BULCX-2103827161-3082 Environmental Management Strategy** (in Section 7);
- **BULOC-1104430715-2299 Hazard and Incident Management Procedure**; and
- **BULOC-1104430715-1210 Emergency Management Plan**.

4.4 Notification of Local Landholders and Community

Community notification shall be undertaken at the determination of the Environment and Community Manager and may be based on environmental monitoring results. Names and contact details of stakeholders, including local and downstream residents are included in the Consultation Manager database. 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 who may have been notified by the initial early warning. Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, Community Consultative Committee meetings, Bulga Coal Complex website, media statements or any other strategy as defined in the **BULCX-2103827161-7720 Social Performance Management Plan**.

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 on local landholders and the community;
- Site contact details; and
- Advice or recommendations based on the incident type and scale.

Should a blast fume cloud leave site and have the potential to impact on the village of Broke and surrounds, the Broke School (**02 6579 1040**) will be notified by the Environment and Community Manager to enable them to bring the children inside should it continue to move towards the Village.

Similarly should a Blast fume cloud leave site and have the potential to impact on the village of Milbrodale, the Milbrodale School (**02 6574 5163**) will be notified by the Environment and Community Manager to enable them to bring the children inside should it continue to move towards the Village.

Should a blast fume cloud leave site and have the potential to impact on the surrounding community a notification of the event will be posted on the Broke Notice Board Facebook page.

² EPA, *Frequently Asked Questions Regarding the Duty to Notify of a Pollution Incident* (July 2021) <<http://www.epa.nsw.gov.au/legislation/poefaqsnofity.htm>>

5. Training, Testing and Communication

5.1 Training

All personnel affected by the content of this document will receive instruction or explanation on the relevant parts of the document as per **BULOC-1447843615-2330 Training and Competency Management Plan**.

Incident management and emergency response shall be included in all GCAA Generic and Bulga Coal Complex site inductions.

Additionally, routine training exercises may be undertaken which involve the emergency response team responding to a simulated emergency, but may also include expanded simulations that involve other (or all) site personnel, the Bulga Incident Management Team and external response agencies (Ambulance, Fire, Mines Rescue etc).

All training records, including the name of the person undertaking training and date of training, shall be maintained in compliance with **BULOC-1104430715-2381 Document and Records Procedure**.

5.2 Testing, Review 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:

1. The PIRMP will be tested every 12 months 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.
2. A review of the PIRMP will occur every 12 months commencing from the date of authorisation by the BCC Environment and Community Manager. Contact details in this document must be kept current at all times.
3. The PIRMP will be tested and 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.

Records will be kept in accordance with **BULOC-1104430715-2381 Document and Records Procedure** and will be included in **Appendix E** - of this plan.

Information regarding testing includes:

- The manner in which the test was undertaken;
- Dates when this plan has been tested;
- The person who carried out the testing; and
- The date and description of any update of or amendment to the plan (**Section 7.1**).

5.3 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 Bulga Coal Environment and Community Manager) via the Bulga Coal Complex 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.

6. Accountabilities

Table 4 - Accountabilities for the PIRMP

Role	Accountabilities for this document
Operations Manager	<ul style="list-style-type: none"> Authorising the PIRMP and all subsequent updates Ensuring adequate resourcing for implementation of the PIRMP Authorised to liaise with relevant authorities
Environment & Community Manager	<ul style="list-style-type: none"> Undertaking notification as defined in this PIRMP Managing the response to a pollution incident Arranging testing and update of PIRMP Ensuring notification and training of PIRMP Coordinating communications with affected community members
Environment & Community Coordinator / Officer	<ul style="list-style-type: none"> Undertaking notification as defined in this PIRMP Coordinating the response to a pollution incident Facilitation of training provided to site personnel in the implementation of this PIRMP Communication of the requirements of this PIRMP to site personnel

7. 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.

7.1 Change Information

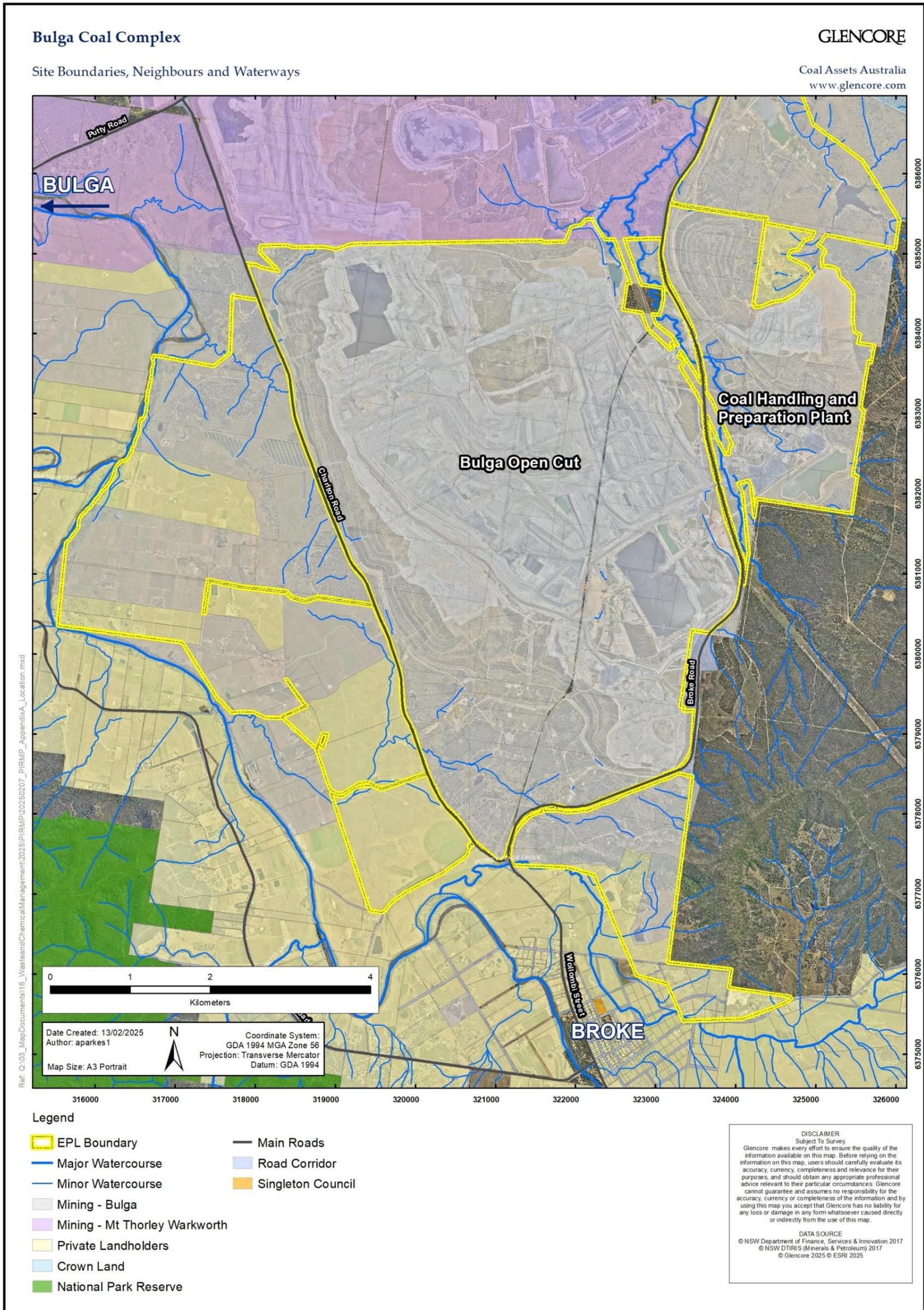
Full details of the document history are recorded in the document control register, by version. A summary of the current change is provided in **Table 5** below.

Table 5 - Change Information

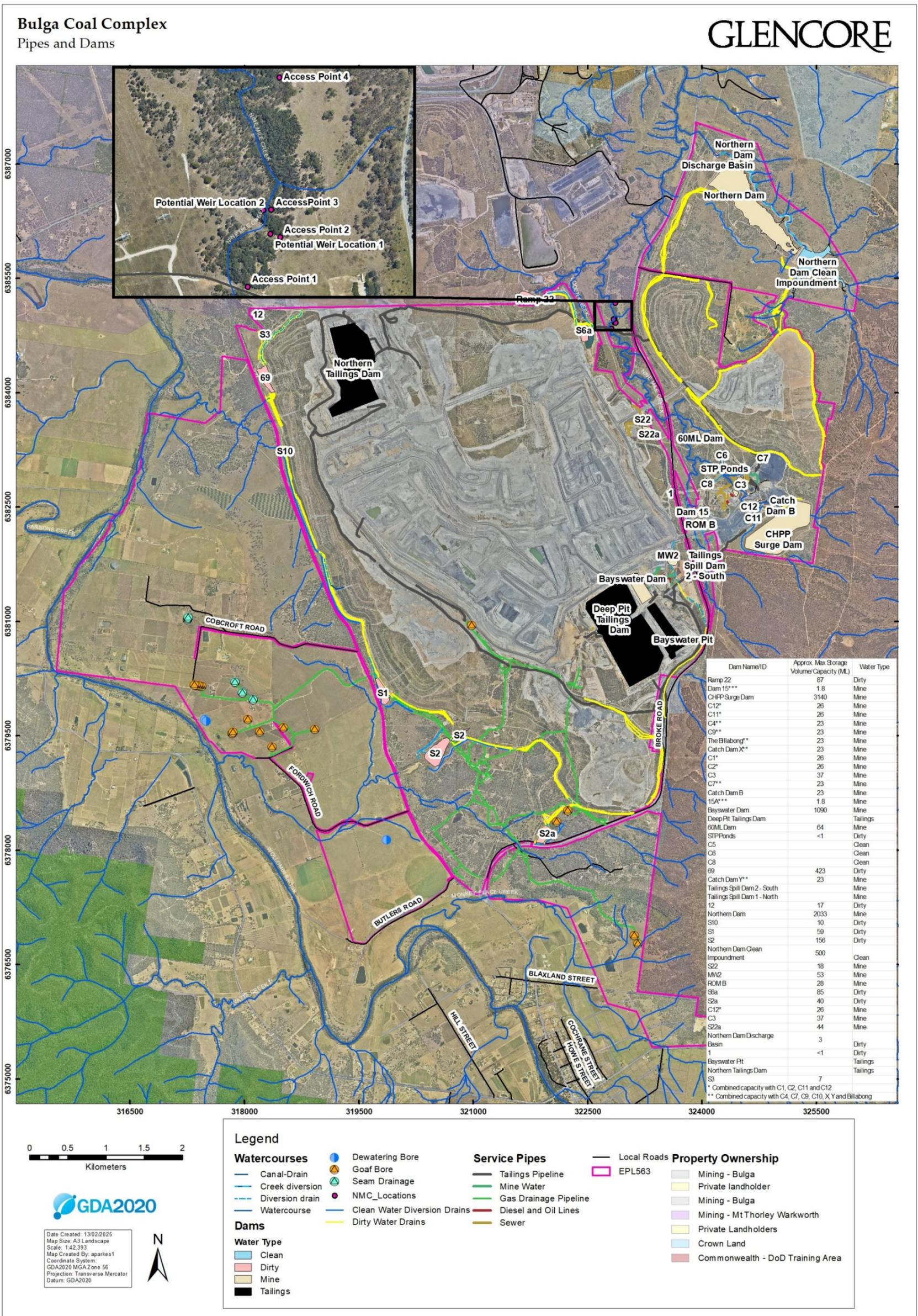
Version	Date	Review Team	Change Summary
5.0	14/10/2019	Sarah Moore Ralph Northey	Review following incident. Update of document references, content, maps and external contact details following the desktop review.
5.1	23/01/2020	Jake Hawkins	Added section 4.2 'Reportable Water Pollution Incidents', revised Figure 4.1 – Incident – Response – Notification – Flow chart, and operations manager details.
5.2	04/05/2020	Jack Caldwell	Review following incident. Internal contacts in Figure 4-1 were updated.
6.0	17/11/2020	Scott Wolfenden Ralph Northey	Revised environmental emergency response procedures and pollution source figures following annual test.
7.0	12/10/2021	Sarah Moore Ralph Northey	Put document into new sharepoint template. Update of document references, contact details and location maps following the desktop review.
8.0	22/06/2022	Sarah Moore Ralph Northey	Review following incident. Updated document references, contact details and location maps.
9.0	16/06/2023	Sarah Moore Ralph Northey	Update of document references, contact details and location maps following the desktop test. Also updated the flow chart.
10.0	11/06/2024	Fabio Perez Ralph Northey	Update of document references, contact details and location maps following the desktop test. Also updated the flow chart (Figure 1).
11.0	12/12/2025	Fabio Perez Ralph Northey	Major review. Update of document references, contact details and location maps following the desktop test. Also updated the flow chart (Figure 1).

Version	Date	Review Team	Change Summary
12.0	17/02/2025	Fabio Perez Ralph Northey	Major review. Update to align with POEO Regulation (2022) – Table 1 and review after EPA Audit. Added Section 1.5, Minor changes on Sections 1, 1.3 and 1.4. Fixed broke links to Sharepoint document. Updated Figure 1, Appendix B and C. Included Appendix D and G.
13.0	12/12/2025	Fabio Perez Ralph Northey	Minor review to update location of the new bulk fuel and lube/storage in Appendix C, and table with the records of PIRMP tests.

Appendix A - Site Location and Surrounding Areas

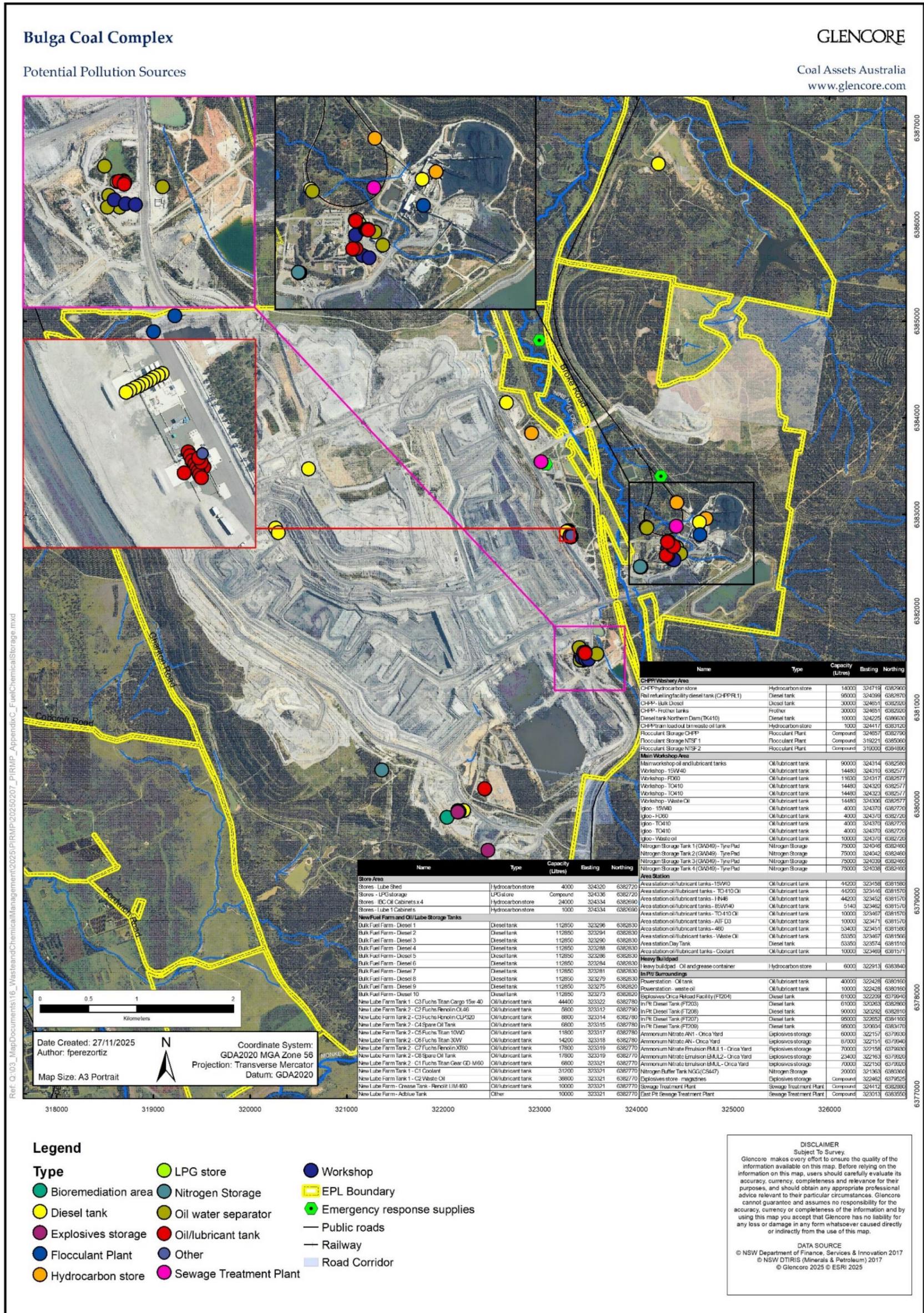


Appendix B - Potential Pollutant Sources – Pipelines and Dams

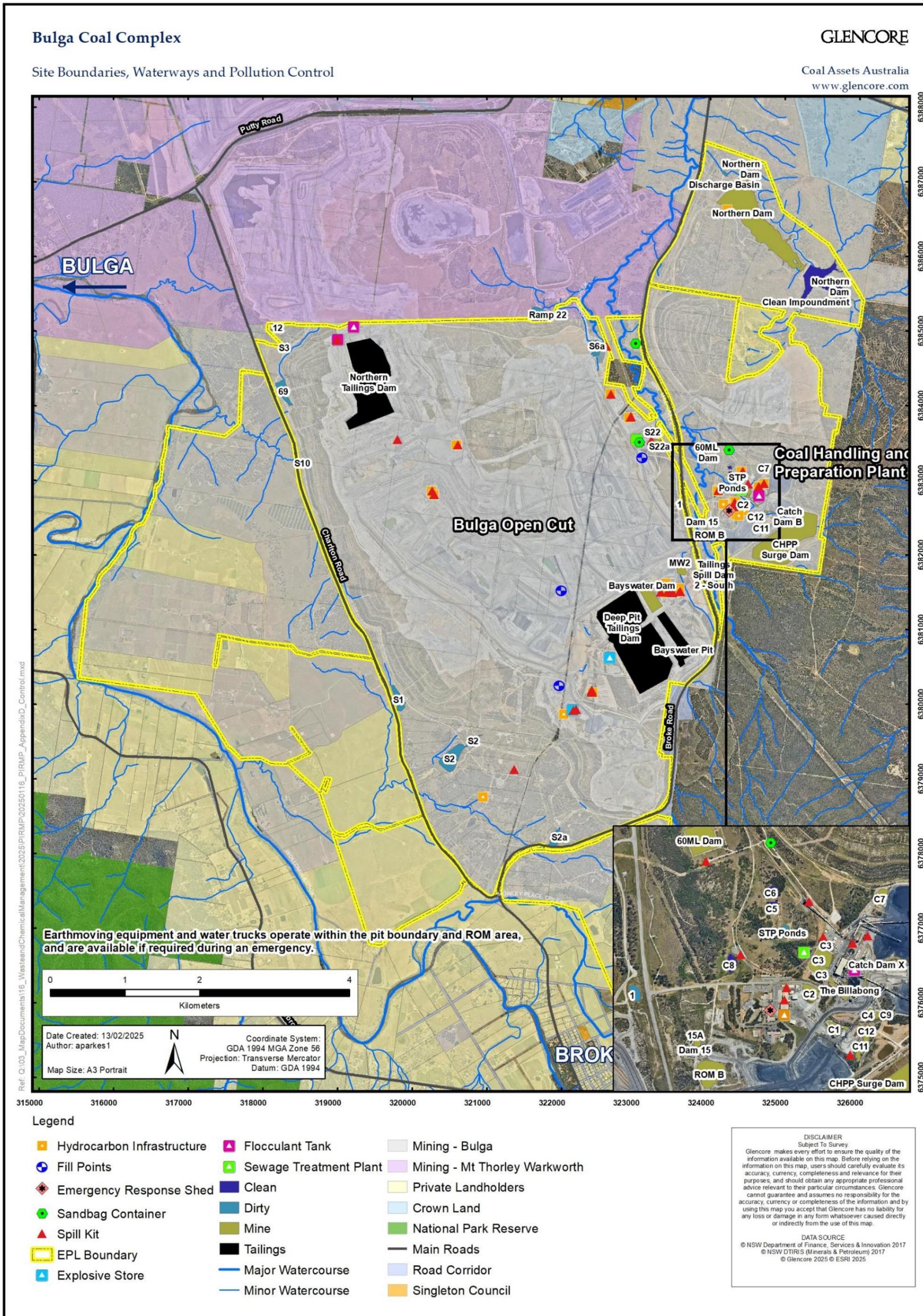


Ref: C:\03_Map\Documents\16_WasteandChemicalManagement\2025\PIR\PIR\20250207_PIRMP_AppendixB_PipesDams_v3.mxd

Appendix C - Potential Pollutant Sources – Fuel and Chemical Storage



Appendix D - Potential Pollutant Sources – Pollution Control



Appendix E - PIRMP Testing History

Date	Review Team	Nature of the Test	Actions
17/04/2019	Sarah Moore	Desktop review	Update of document references, contact details and maps following the desktop review.
14/10/2019	Sarah Moore Ralph Northey	Desktop review following incident	Review following incident. Update of document references, content, maps and external contact details following the desktop review.
04/05/2020	Jack Caldwell	Desktop review following incident	Update of internal contacts following the desktop review.
26/10/2020	Scott Wolfenden Ralph Northey	Environmental incident response simulation	Added reference to Northern Tailings Storage Facility Emergency Response Plan and revised potential pollution sources maps.
12/10/2021	Sarah Moore	Desktop Review	Update of template, document references, contact details and location maps.
22/06/2022	Sarah Moore Ralph Northey	Desktop Review following incident	Review following incident. Updated document references, contact details and location maps.
08/06/2023	Sarah Moore Ralph Northey	Desktop Review	Updated document references, contact details and location maps. Also updated the flow chart.
03/06/2024	Ralph Northey Fabio Perez	Desktop Review	Update of document references, contact details and location maps following the desktop test. Also updated the flow chart (Figure 1).
19/05/2025	Fabio Perez Ralph Northey	Desktop Review	Review of document references. Public documents, contact numbers. Update of the Emergency Contacts Register in Consultation Manager.

Appendix F - Prescribed Matter for the Pollution of Water

- a) animal matter of any description, including (but not limited to) carcasses of animals, parts or remains of animals, offal, flesh and bones,
- b) plant matter of any description, including (but not limited to) vegetable or fruit wastes, leaves, grass, trees, wood, sawdust, shavings, chips, bark or other forest products or refuse,
- c) ashes, soil, earth, mud, stones, sand, clay or similar inorganic matter,
- d) washings or spoil from any mineral processing or extractive operation, from any dredging operation or from any other industrial, agricultural or commercial activity,
- e) ballast,
- f) excreta, manure or urine, or any waste from an on-site human waste storage facility or treatment device or any matter that contains faecal coliform or faecal streptococci,
- g) matter of an infectious nature,
- h) scrap metal, glass, junk, paper, plastic, rubbish, vehicles or vehicle tyres, any industrial waste and any refuse of any other description,
- i) oil, grease or flammable liquid of any description,
- j) thermal waste (being any liquid which, after being used in or in connection with any activity, is more than 2 degrees Celsius hotter or colder than the water into which it is discharged),
- k) matter that causes biochemical or chemical oxygen demand,
- l) liquid that contains suspended or dissolved solids,
- m) gas other than oxygen,
- n) methylene blue active substance,
- o) matter that has a pH value of less than 6.5 or more than 8.5,
- p) any pesticide (within the meaning of the *Pesticides Act 1999*),
- q) radioactive substances or poisonous substances of any description,
- r) substances classified as dangerous goods under the Transport of Dangerous Goods Code (within the meaning of Schedule 1 to the Act),
- s) substances listed in Schedule 10 to the *Sydney Water Act 1994*.

Appendix G - Primary hazards from EC Risk Assessment

Hazards	Potential Maximum Consequence	Controls	Residual Risk - Consequence	Residual Risk - Likelihood	Residual Risk - Rating
Loss of containment causing land or water contamination offsite	3-Moderate	Alarms and cameras on dams and differential flow lines Water infrastructure design Maintenance and inspection regime Training Needs Analysis Protocols, Plans, Procedures and Permits Environmental Assessment and Monitoring Water Model Designated bioremediation facility Hydrocarbon infrastructure compliant to AS1940 Spill Kits/containers ChemAlert	3-Moderate	3-C - Possible	Medium
Mining operations generate unacceptable noise levels (including low frequency) that results in a non-compliance with licence criteria or results in a complaint	2-Minor	Noise Modelling and Monitoring Equipment Procurement Process Maintenance and inspection regime Protocols, Plans, Procedures and Permits Community Mitigation Agreements LOM Risk and Review Process Training Needs Analysis Environmental delays in operational budget	1-Negligible	5-A - Almost Certain	Medium

Hazards	Potential Maximum Consequence	Controls	Residual Risk - Consequence	Residual Risk - Likelihood	Residual Risk - Rating
Blasting operations generate a significant fume/dust/vibration that results in a non-compliance with licence criteria or results in a complaint	2-Minor	Quality control of blast products Blast Design, Modelling and Monitoring Infrastructure stabilisation Maintenance and inspection regime Camera Network Community Stakeholder Engagement Visually recorded blast shots	2-Minor	3-C - Possible	Medium
Land is cleared without appropriate approvals in place causing harm to flora or fauna	2-Minor	Fencing and signage GIS layers Training Needs Analysis Protocols, Plans, Procedures and Permits Maintenance and inspection regime	2-Minor	3-C - Possible	Medium
Mine traffic movements cause public nuisance or do not meet approval conditions	2-Minor	Workforce busses Community Stakeholder Engagement Vehicle wash-downs Staggered shift times with neighbouring mines Protocols, Plans, Procedures and Permits Training Needs Analysis	2-Minor	3-C - Possible	Medium
Visual impacts from mine cause public nuisance or do not meet approval conditions	2-Minor	Maintenance and inspection regime Infrastructure Location and Mine Design Protocols, Plans, Procedures and Permits Training Needs Analysis Community Stakeholder Engagement	2-Minor	3-C - Possible	Medium

Hazards	Potential Maximum Consequence	Controls	Residual Risk - Consequence	Residual Risk - Likelihood	Residual Risk - Rating
<p>Operations generate unacceptable dust levels that results in a non-compliance with licence criteria or results in a complaint</p>	<p>2-Minor</p>	<p>Community Mitigation Agreements Camera Network Maintenance and inspection regime Temporary rehabilitation Protocols, Plans, Procedures and Permits Training Needs Analysis Community Stakeholder Engagement Equipment Procurement Process Environmental delays in operational budget</p>	<p>2-Minor</p>	<p>3-C - Possible</p>	<p>Medium</p>