

# MANGOOLA OPEN CUT

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GLENCORE



## Pollution Incident Response Management Plan

**Number:** MANOC-1772150304-1830

**Owner:** Coordinator – Environment & Community

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*Uncontrolled unless viewed on the intranet*

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# 1. Introduction

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## 1.1 Background and Scope

The **Protection of the Environment Legislation Amendment Act 2011** (PELA) received assent on 16 November 2011 resulting in changes to the **Protection of the Environment Operations Act 1997** (POEO Act). The intent of the PELA is to improve the way pollution incidents are reported and managed. Provisions include a requirement for holders of Environmental Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). 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 12894, Mangoola Coal Pty Ltd (Mangoola) is required to comply with the POEO Act; as such, this document has been developed to satisfy the PIRMP requirements documented above. This document also details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. **The notification of environmental incidents under this PIRMP are 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 5.1).**

## 1.2 Regulatory Requirements

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

## 1.3 Definitions

### Emergency

An emergency is a situation that is developing, or has developed, that poses a threat to Life, the Environment and Property, which necessitates immediate action.

### Pollution Incident

Pollution incident means an incident or set of circumstances during or as consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which

a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

- a) harm to the environment is material if:
  - i it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - ii it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Table 1-1 – Compliance reference to information mandated under Section 153C of the POEO Act and clause 98C of the POEO (G) Regulation

Section 153C	Detail Required	Location in Document
(a)	The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to:	Section 5.3
	(i) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates, and	Section 5.2
	(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	Section 5.2
	(iii) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act)	
(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 4.0
(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 5.2
(d)	Any other matter required by the Protection of the Environment Operations (General) Regulation 2022 (as set out below):	Section 2.2
	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>	
	72 (b) <i>The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.</i>	Section 2.2
	72 (c) <i>Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.</i>	Section 4.2
	72 (d)	Section 2.4

Section 153C	Detail Required	Location in Document
	<i>An inventory of potential pollutants on the premises or used in carrying out the relevant activity.</i>	
	72 (e) <i>The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.</i>	Section 2.4
	72 (f) <i>A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.</i>	Section 4.0
	72 (g) <i>The names, positions and 24-hour contact details of those key individuals who:</i> <i>(i) are responsible for activating the plan, and</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 3.2 Section 5.2
	72 (h) <i>The contact details of each relevant authority referred to in section 148 of the POEO Act.</i>	Section 5.2
	72 (i) <i>Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.</i>	Section 5.3
	72 (j) <i>The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.</i>	Section 4.2 Section 4.0
	72 (k) <i>A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.</i>	Figure 2-3
	72 (l) <i>A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk.</i>	Section 4.2 Section 4.0
	72 (m) <i>The nature and objectives of any staff training program in relation to the plan.</i>	Section 6.1
	72 (n) <i>The dates on which the plan has been tested and the name of the person who carried out the test.</i>	Section 6.2 Appendix B

Section 153C	Detail Required	Location in Document
	72 (o) <i>The dates on which the plan is updated.</i>	Section 6.2 Appendix B
	72 (p) <i>The way the plan is to be tested and maintained.</i>	Section 6.2 Appendix B

## 2. Premises Details

### 2.1 Site Details

Mangoola, an open cut coal mine, is located near Wybong, approximately 20 kilometres west of Muswellbrook and approximately 10 kilometres north of Denman in the Upper Hunter Valley of New South Wales (refer to **Figure 2-1**).

This plan also includes the Mangoola Coal Continued Operations Project (MCCO). The MCCO Project was approved by the NSW IPC on 26 April 2021. Additional to this, the Federal Minister for Environment granted approval for the MCCO Project under section 130(1) and 133(1) of the Environment Protection and Biodiversity Conservation Act 1999 on 1 October 2021.

The surrounding area which may potentially be impacted by a pollution incident occurring at Mangoola, in addition to the premises itself may include the following:

- landholders adjacent to the mine site (refer to **Figure 2-2**);
- downstream water courses (including inundation areas and adjacent landholders): Sandy Creek, Big Flat Creek, Wybong Creek, Anvil Creek, Reedy Creek, and the Goulburn and Hunter Rivers; and
- Nearby townships of Denman, Sandy Hollow and Muswellbrook (refer to **Figure 2-3**).

### 2.2 Major Hazards

The potential major hazards which have been identified for Mangoola 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;
- blast fume (e.g. blast fume containing NOx) leaves EPL Boundary;
- major water or tailings discharge (for example dam failure);
- fire (for example spontaneous combustion fires associated with coal stockpiles); Explosions (e.g. blasting activities);
- Climate Change related events, such as natural disasters (bushfires, floods or major storm events); and
- Unauthorised access/ sabotage of infrastructure.

## 2.3 Risk Management

The likelihood of environmental hazards occurring has been captured through the Broad-Brush Risk Assessments (BBRA) undertaken annually. The purpose of the BBRA is to identify significant environment and community aspects and impacts 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 aspect is assigned. These documents are prepared and reviewed in accordance with **GCAA-625378177-2844 Risk Management** and **MANOC-1772150304-4333 Risk Management**.

The systematic identification, assessment and management of foreseeable catastrophic (core) hazards is undertaken utilising the adopted GCAA Sustainable Development Guideline for catastrophic (core) hazard management **GCAA-625378177-13271 Catastrophic Hazards** and the procedure for catastrophic (core) hazard assurance monitoring **GCAA-625378177-9980 13.0 Assurance**.

This process includes:

- identifying foreseeable hazards associated with operations at Mangoola;
- assessing Health Safety Environment and Community (HSEC) risks using recognised analysis and evaluation methodologies; and
- implementing controls necessary to eliminate or reduce identified catastrophic risks in accordance with the established hierarchy of controls for environmental management.

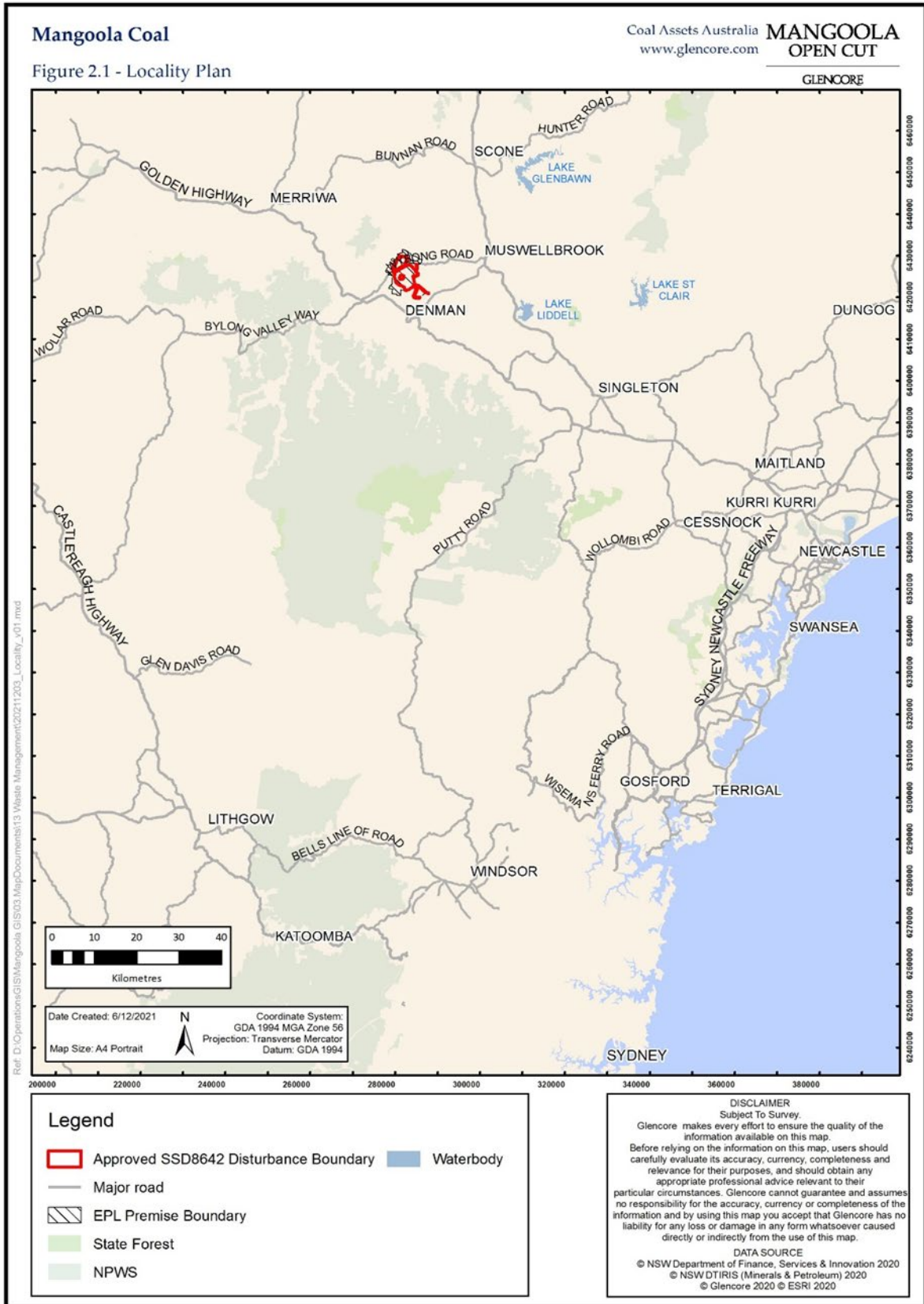


Figure 2-1 – Locality Plan

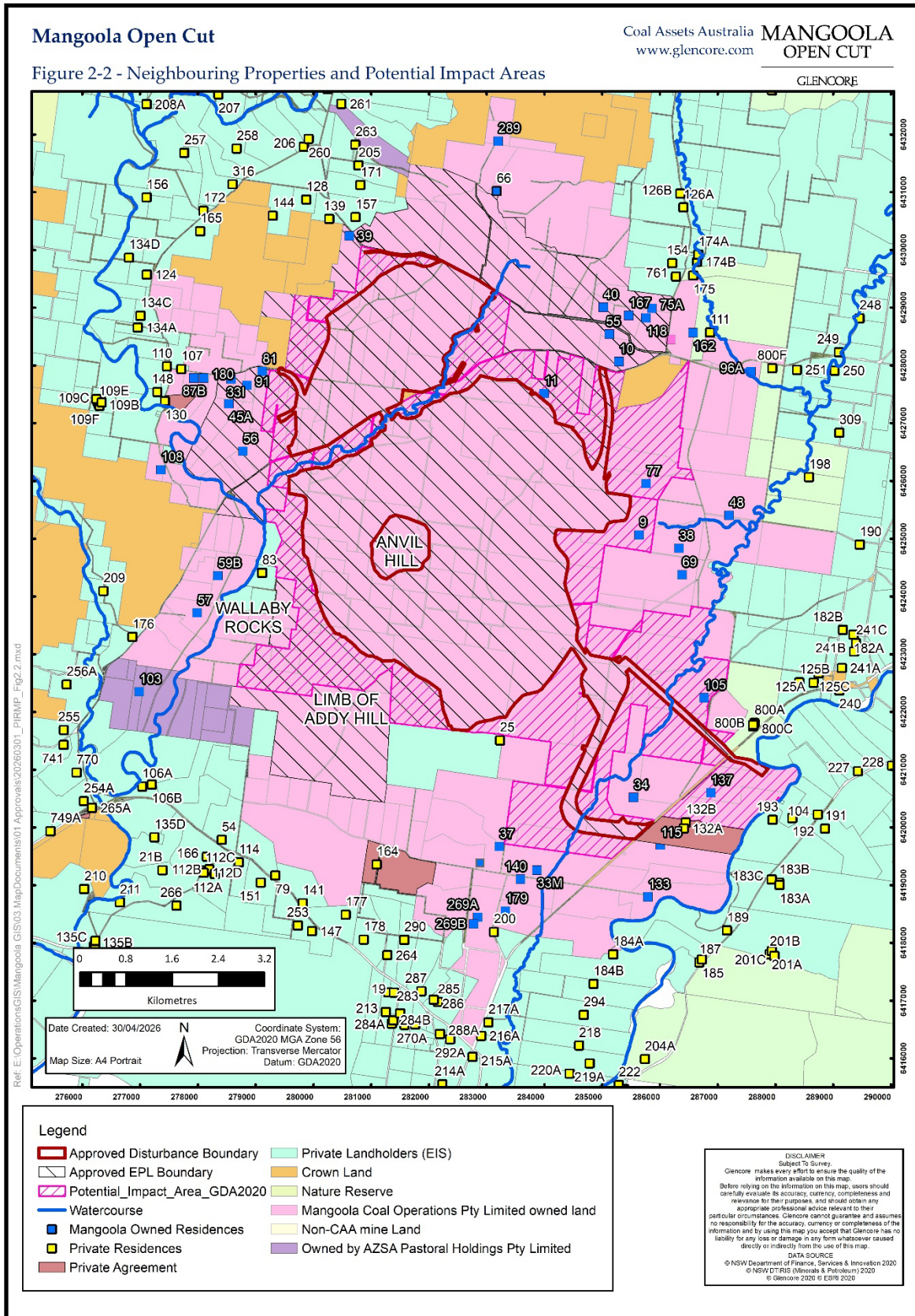


Figure 2-2 – Neighbouring properties and potential impact areas

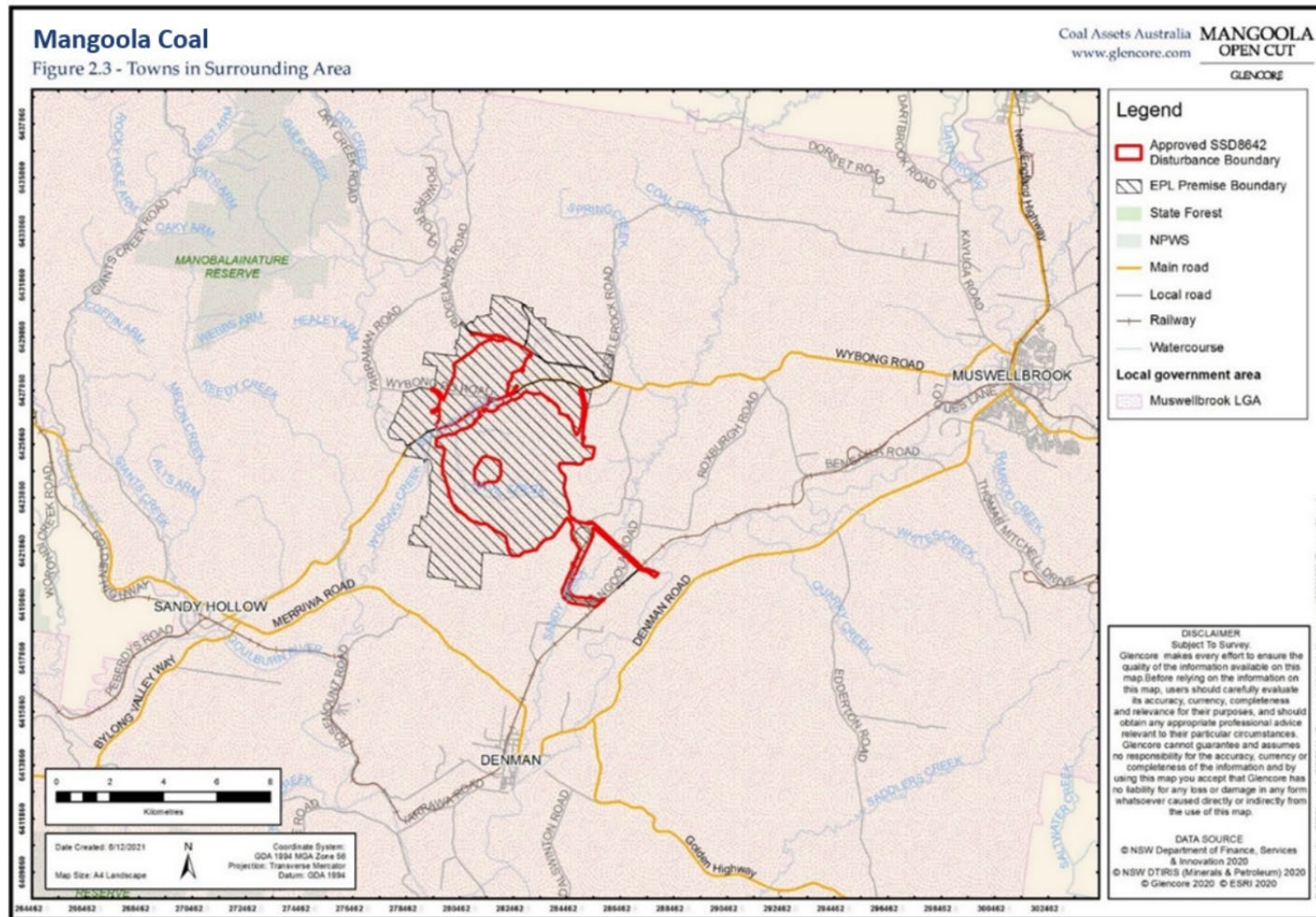


Figure 2-3 – Towns in surrounding area

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## 2.4 Chemicals and Potential Pollutants

The Mangoola **MANOC-1772150304-2296 Hazardous Substances and Dangerous Goods Procedure** details the control methods to manage the potential risk posed by exposure to hazardous substances and dangerous goods within the workplace, to avoid injury or illness to persons and damage to the environment and equipment/plant.

All chemicals at Mangoola are included on 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.

Explosives at Mangoola 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.

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 Mangoola are listed in the Chemalert register.

The facilities that store fuel, oil and hazardous chemicals have been designed in accordance with **Australian Standard 1940 – 1993**. The system has been designed to incorporate:

- impervious walls and floors;
- sufficient capacity to maintain 110% of the volume of the tank (or 110% volume of the largest tank where more than one tank is stored in the bund);
- walls not less than 250 mm high; and
- floors graded to a collection sump.
- Maximum inventories for bulk fuels and oils onsite are contained in Table 2 1 below.

*Table 2-1– Maximum inventories for fuels, flocculant and oils onsite bulk stored*

Pollutant Type	Location	Capacity
Diesel	Workshop	683,000L
Oil	Workshop	34,200L
Oil	Workshop	34,200L
Oil	Workshop	19,190L
Oil	Workshop	14,700L
Oil	Workshop	14,750L

Pollutant Type	Location	Capacity
LPG	Admin Car Park	7,500L
Diesel	Explosive Magazine Area	60,000L
Diesel	Train loadout provisioning facility	100,000L
Oil	Train loadout provisioning facility	4,000L
Flocculent	CHPP and Tailings Dam 4	28,000L

Explosives for surface operations are stored in accordance with WorkCover requirements. The Dangerous Goods Licence (No XSTR100218) covers the storage of these materials.

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

- mine tailings;
- sediment laden surface water runoff from disturbed areas; and
- effluent waste.

These material quantities are in a constant state of change as a result of mining operations. Potential inventories of sediment laden water, saline mine affected water and effluent waste are included in **Table 2-2**.

*Table 2-2– Maximum inventories for sediment laden water, saline mine affected water and effluent waste*

Pollutant Type	Location	Potential Maximum Capacity
Raw Water	Raw Water Dam; Seepage collection sump; and Sandy Creek Farm Dam 1 & 2	2.5 GL; 0.01 ML; and 2.6 ML
Saline Water	Pit Water Dam	1.7GL
Saline Water	Transfer Dam	40.2 ML
Tailings	Tailings Dam 1 ( <i>capping in progress</i> )	1.8 GL
Tailings	Tailings Dam 2 ( <i>capping in progress</i> )	4 GL
Tailings	Tailings Dam 4	11.1 GL
Tailings	Tailings Dam 4 - Decant	251
Sediment laden water	NOOP	49 ML
Sediment laden water	South Pit North	6.7 ML
Sediment laden water	South Pit South	8.4 ML
Sediment laden water	NAR	20.3 ML
Saline Water/ Sediment	Rail Loop	28 ML
Saline Water/ Sediment	CHPP	25 ML
Saline Water/ Effluent	Administration	190,000 L
Sediment laden water	MNSD1	88.2 ML
Sediment laden water	MNSD2	80 ML

Risks associated with these potential pollutants are incorporated into the site’s BBRA.

Figure 2.4 displays the location of potential pollutants at the premises.

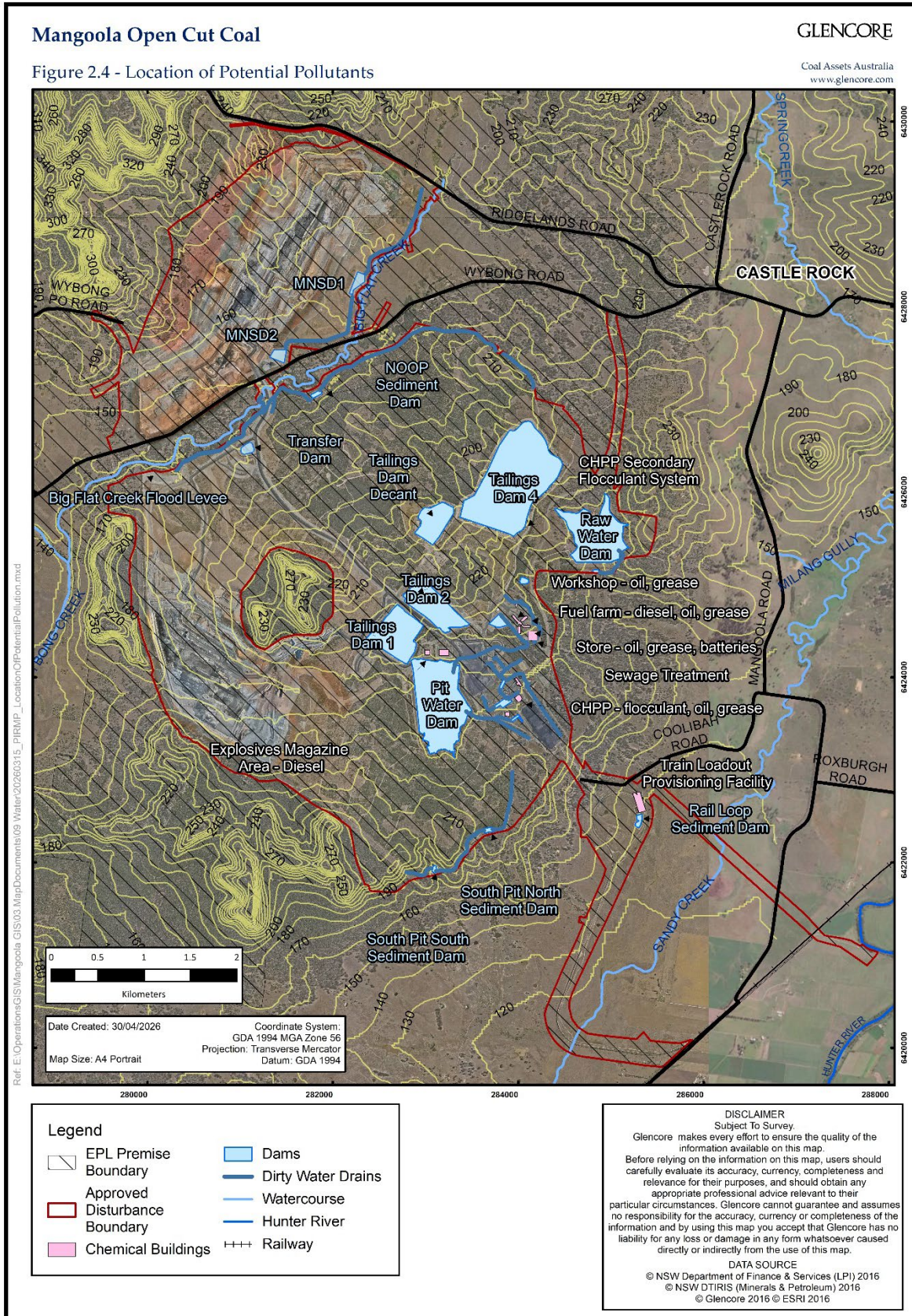


Figure 2-4 Location of Potential Pollutants

## 3. Management and Responsibilities

### 3.1 Legal Duty to Notify

All Mangoola employees and contractors are responsible for immediately alerting their supervisor to all environmental incidents or hazards which may result in environmental harm, regardless of the nature or scale. Immediately is taken to mean 'promptly and without delay'.

Notification responsibilities are detailed in the POEO Act (Section 148), 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 Mangoola) 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 5.2**; 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) of a potential pollution incident, must undertake notification to the appropriate regulatory authority of any "material harm incidents", including all relevant information. Notification shall be undertaken by the Environment and Community Manager or Operations Manager as per **Section 5.2**.

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>.

### 3.2 PIRMP Contact Details

The specific responsibilities associated with the management and implementation of the PIRMP is outlined in **Table 3-1**.

*Table 3-1– PIRMP Management Responsibilities*

Name	Contact details	Position	Responsibility
<b>Jacob Hundertmark</b>	Office: 02 6549 5501  Mobile: 0421 990 800	Operations Manager	Responsible for authorising the PIRMP and all subsequent updates  Responsible for ensuring adequate resourcing for implementation of the PIRMP  Liaise with the relevant authority
<b>Robyn Ellis</b>	Mobile: 0407 348 270	Environment and Community Manager	Responsible for undertaking notification as defined in this PIRMP

<sup>1</sup> EPA, Frequently Asked Questions Regarding the Duty to Notify of a Pollution Incident (14 July 2021) <https://www.epa.nsw.gov.au/Licensing-and-Regulation/Legislation-and-compliance/about-the-poeo-act/protection-of-enviro-leg-amendment-act-2011/faqs-duty-to-notify-pollution-incident>

Name	Contact details	Position	Responsibility
			<p>Responsible for managing the response to a pollution incident</p> <p>Responsible for arranging testing and updating of the PIRMP</p> <p>Responsible for ensuring notification and training of PIRMP</p> <p>Responsible for coordinating communications with affected community members</p>
<b>Annemieke Grosser</b>	Mobile: 0498 466 560	Environment and Community Coordinator	<p>Responsible for assisting notification as defined in this PIRMP</p> <p>Responsible for coordinating the response to a pollution incident</p> <p>Facilitate site personnel in implementation of the PIRMP</p> <p>Communication of the PIRMP to site personnel</p>

## 4. Incident Management

In compliance with **MANOC- 1772153034-4297 Incident and Hazard Management**, the actions to be implemented at Mangoola in the event of an incident include the following:

1. Secure the scene and contain the incident.
2. Gather information (i.e. environmental monitoring).
3. Determine the investigation level.
4. Commence an Incident Cause Analysis Method (if required).
5. Review and classify information and determine actions.
6. Complete corrective/preventative actions.
7. Trend analysis reports.

Emergency protocols including description and location of safety equipment, actions 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 **MANOC-1772150304-615 - Emergency Response Control Plan**.

Incident management at Mangoola 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 Glencore Coal Assets Australia (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.

## 4.1 Emergency Response

With regards to the specific major hazards identified in *Section 2.2*, emergency procedures have been incorporated into relevant site management plans and procedures as described below:

### 4.1.1 Spills

This includes spills (e.g. hydrocarbon, hazardous chemicals, etc.) resulting in land and/or water contamination.

#### **MANOC-1772150304-615 Emergency Response Control Plan**

This procedure covers all high potential emergency situations identified in Mangoola's First Aid and Emergency Response Risk Assessment, which includes:

- Medical/First Aid Emergency;
- Vehicle Collision/Incident;
- Fire - Infrastructure/Machinery/Bushfire;
- Chemical Spill/Environmental Emergency;
- Protestors;
- Electric Shock;
- Explosives

### 4.1.2 Blast Fume Exposure

#### **MANOC-1772150304-757 Blast Fume Management Procedure**

This procedure covers the management and response measures related to a potential and actual Blast Fume event. The scope of this procedure outlines measures required to determine if someone has been exposed to fume and what actions should be taken to respond.

### 4.1.3 Major Water Discharge

Major water discharge which includes, for example, dam failure.

#### **MANOC-1772150304-49 Inrush Principal Hazard Management Plan**

The Mangoola Coal Inrush Principal Hazard Management Plan includes control measures specific to potential inrush hazards, including:

- Spontaneous combustion;

- High wall/low wall failure;
- Failure of a surface storage bin or tank;
- Dam failure; and;
- Flooding.

#### 4.1.4 Fire

Fire includes, for example, spontaneous combustion fires associated with coal stockpiles.

##### **MANOC-1772150304-60 Fire and Explosion Principal Hazard Management Plan**

The Fire and Explosion Management Plan provides direction to mine personnel so that the hazards associated with Fire & Explosion potential are identified, evaluated, eliminated or controlled to an acceptable level.

##### **MANOC-1772150304-4291 Mangoola Coal Bushfire Management Plan**

The Bushfire Management plan includes an assessment of fire risks and assets, identifies practical management strategies to reduce the risk of fire to life and property, methods to reduce fire ignition potential, and to prevent the spread of fire within and beyond the site.

#### 4.1.5 Unplanned Explosions

##### **MANOC-1772150304-6075 Emergency Response – Fire, Explosion and Lightning Procedure**

The Emergency Response – Fire, Explosion and Lightning Procedure details the controls in place for major hazards, including:

- Inappropriate emergency response plan;
- Inadequate firefighting equipment and resources; Ineffective communications Evacuation plans, and muster points not known or monitored;
- Bulk Explosive Trucks and Shot Firers Vehicles;
- Empty Bulk Fuel Tankers and External Common Carriers;
- Explosives Magazine and/or Reload facility;
- Bulk L.P.G and Fuel Farms; and
- Inadequate security arrangements.

## 4.2 Pre-emptive Controls

Mangoola implement a number of controls to manage the Major Hazards as identified in **Section 2.2**. Some of these controls include, but are not limited to:

All Mangoola employees and contractors receive emergency preparedness and response training during their site familiarisation induction.

Mangoola maintains a dedicated emergency response team who undergo regular training and operational drills;

Mangoola has accessible personal protective equipment for staff and contractors;

- Spill containment/control equipment including:
  - emergency spill kits;

- portable pumping infrastructure;
  - earth moving plant;
  - floating booms and silt curtains; and
  - erosion and sediment control materials.
- Fire control systems, including water carts;
  - Fire suppression on relevant mobile and fixed infrastructure;
  - Hydrocarbon and chemical storage as per relevant Australian Standards;
  - Real time leak detection and monitoring for high-risk pipelines;
  - Real time water level monitoring and alarm capabilities on high-risk dams; and
  - Pre-blast environmental assessment process utilising predictive forecasting for blasting activities.

Mangoola Coal 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 Mangoola owned land, Mangoola will liaise directly and provide appropriate assistance to the relevant authority and emergency services.

## 5. Notification Procedures

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### 5.1 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**' as described in *Section 1.1*.

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.

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

### 5.2 External Notification

As discussed in *Section 3.1*, notification of an environmental incident is the responsibility of all site and contractor personnel. In the event of an incident, response and notification must be undertaken as per *Figure 5.1*.

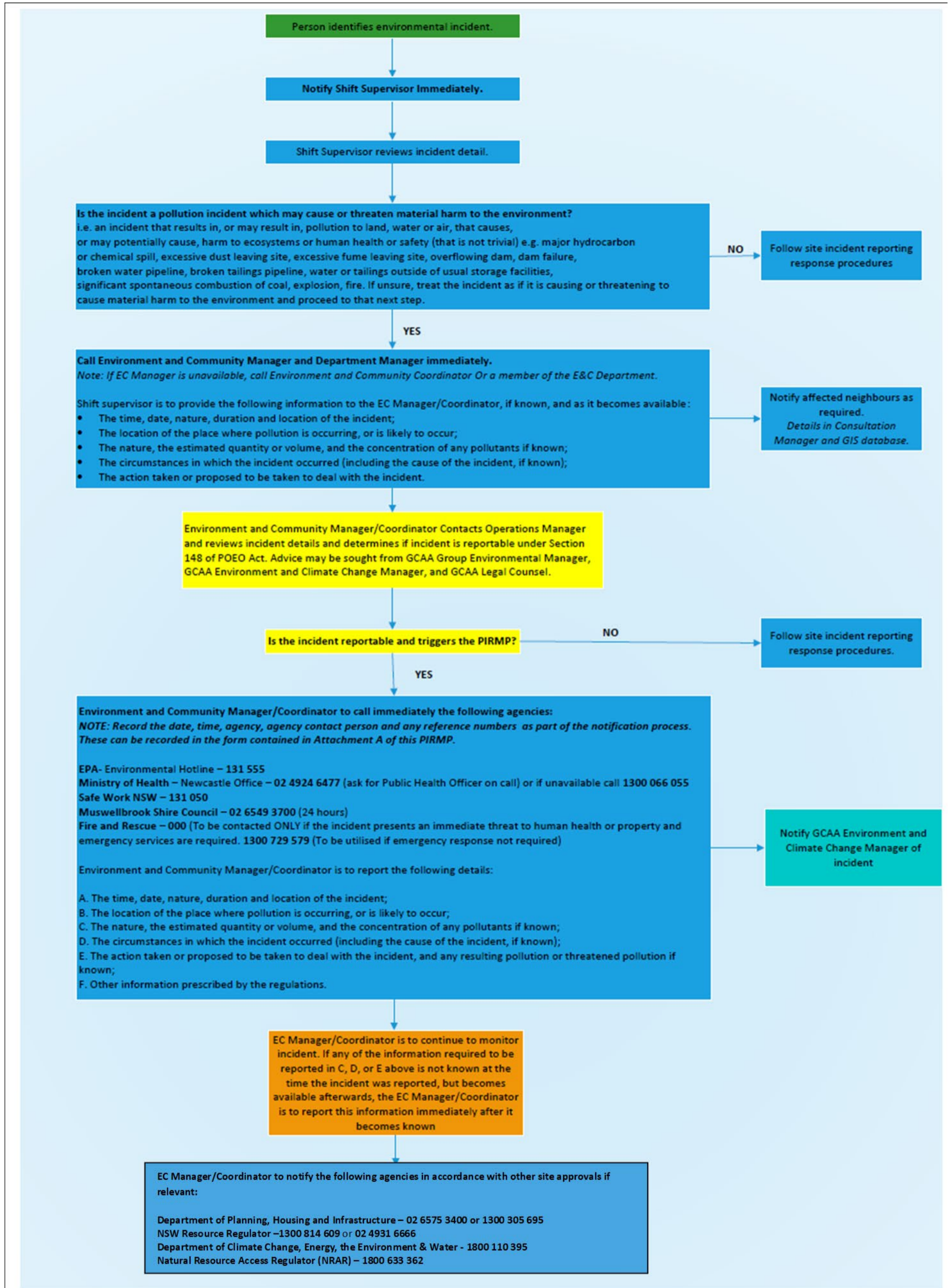


Figure 5-1 – Incident Responses and Notification Process

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 addition to being detailed in this document, procedures for undertaking internal and external notification are included in the documents as noted in *Section 4.1*.

### 5.3 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 held in the Consultation Manager database and the Mangoola Geographical Information System (GIS). The following notification methodology is proposed to be utilised as required:

- early warnings: same day telephone or SMS notification to landholders who may be affected by the incident over the subsequent 24-hour period; and
- if residences cannot be contacted, a representative will be sent to the residence should it be safe to do so;
- 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, Mangoola website, media statements or any other strategy deemed appropriate.

Priority will be granted to notification of sensitive premises in close proximity such as schools, pre-schools, nursing homes and hospitals.

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; and
- advice or recommendations based on the incident type and scale.

## 6. Training, Testing and Communication

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### 6.1 Training

Training on this document will be undertaken as per **MANOC-2083857530-1248 Training and Competency Management System**.

Incident management and emergency response shall be included in all GCAA Generic and Mangoola site inductions.

### 6.2 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 will include all components of the plan, including training requirements. Testing shall be undertaken in the following ways:

1. Testing is taken to be either a desktop review or
2. A practical environmental emergency drill.

PIRMPs must be tested routinely at least once every 12 months and within one month of any pollution incident occurring. The review will be undertaken in light of the incident or test, to ensure 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 **MANOC-1772150304-1435 Document Control Standard**. Information to be retained regarding PIRMP testing includes:

- The manner in which the test was undertaken (desktop/practical);
- Date(s) when the plan has been tested;
- The person(s) who carried out the testing;
- The date and description of any update of or amendment to the plan.

PIRMP Test Record **Attachment B** provides further detail on the recent PIRMP test.

### 6.3 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 Operations Manager) via the Mangoola 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.

## 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 Related Documents

Related documents, listed in **Table 7-1** below, are internal documents directly related to or referenced from within this document.

*Table 7-1 – Related documents*

Number	Title
<u>MANOC-1772150304-4333</u>	Risk Management Standard
<u>MANOC-1772150304-2296</u>	Hazardous Substances and Dangerous Goods Standard
<u>MANOC-1772150304-615</u>	Emergency Response Control Plan
<u>MANOC-1772150304-4652</u>	Environmental Management Strategy
<u>MANOC-1772150304-49</u>	Inrush Principal Hazard Management Plan
<u>MANOC-1772150304-6075</u>	Emergency Response – Fire, Explosion and Lightning Procedure
<u>MANOC-1772150304-4291</u>	Bushfire Management Plan
<u>MANOC-1772150304-55</u>	Explosives Control Plan
<u>MANOC-1772150304-757</u>	Blast Fume Management Procedure
<u>MANOC-1772150304-4297</u>	Incident and Hazard Management
<u>MANOC-2083857530-1248</u>	Training and Competency Management System
<u>MANOC-1772150304-1435</u>	Document Control Standard
<u>MANOC-1772150304-60</u>	Fire and Explosion Management Plan
	Mangoola Environment and Community Risk Assessment
<u>GCAA-625378177-13271</u>	Catastrophic Hazards Protocol

### 7.2 Reference Information

Reference information, listed in **Table 7-2** below, is *information* that is directly referred to for the development of this document.

*Table 7-2 – Reference information*

Reference	Title
NSW EPA	Protection of the Environment Operations Act 1997 (POEO Act)
NSW EPA	Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation)
NSW EPA	Environmental Guidelines: Preparation of Pollution Incident Response Management Plans
NSW EPA	Protocol for industry notification of pollution incidents

Reference	Title
NSW EPA	Protection of the Environment Legislation Amendment Act 2011

### 7.3 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 below.

Table 7-3 – Change information

Version	Date	Reviewer	Change Details
1.0 – 17.0	12/11/2012 – 17/12/2020	As per version history	New document – as per version history
18.0	17 December 2020	Nathan Lane	Update following PIRMP test undertaken 17 December 2020 Inclusion of TD3 Void in Section 2.3
19.0	4 August 2021	Nathan Lane	Update with change of Operations Manager from Nick Slater to Jacob Hundertmark
20.0	9 September 2021	Nathan Lane Mitchell Green Cameron Eckersley	Update with change of Environment and Community Manager from Nathan Lane to Acting Environment and Community Manager Mitchell Green. Update with change of Environment and Community Coordinator from Mitchell Green to Acting Environment and Community Coordinator Cameron Eckersley.
21	8/12/2021 (added to Sharepoint)  Approved by Acting Ops Manager 7/12/21	Mitchell Green Annemieke Grosser Tim Haig	Updated reference to POEO regulation – Section 131. Included MCCO project areas to site overview and mapping. Updated pollutant table with MCCO sediment dams Updated all maps with EPL boundary Updated contact details of personnel
22	13/12/2021  Approved by Jacob Hundertmark 17/12/2021	Mitchell Green Damien Ryba Annemieke Grosser Jack Clare Rhys Wilson Jacob Hundertmark Sarah Mostyn	Added Jason Martin as PIRMP MCCO contact. Updated test information to a table format and updated date.
23	Approved by Jacob Hundertmark 6/1/2022	Annemieke Grosser Mitchell Green Sam Palmer	Added Sam Palmer as PIRMP Environment and Community Manager Contact. Amended Mitchell Green’s title. Removed Annemieke Grosser from contacts.
24	6/10/2022	Scott Ellerton	Updated contact details (replace Mitchell Green with Scott Ellerton). Minor formatting updates.
25	Feb 2023		Updated contact details (replace Mitchell Green with Scott Ellerton). Minor formatting updates. Note: Metadata dates manually overwritten to align with DPI approval - A Russell

Version	Date	Reviewer	Change Details
26	Feb 2023		Updated contact details (removed Scott Ellerton & replace with Robyn Ellis)
27	May 2023	Robyn Ellis Sam Palmer	Full review of document. Updated contact details Minor formatting updates.
28	Jan 2024	Ali Haidar Robyn Ellis	Full review of document. Updated contact details in Table 3.1 and other minor formatting updates
29	Feb 2025		Full Review of document Updated to reflect updated Regulation Minor formatting updates Update contact details
30	March 2026	Annemieke Grosser Robyn Ellis	Full review of document following annual test. Review of Agency contacts Updated maps

## Appendix A - PIRMP Notification Form

### A.1 Details of Incident

Detail Required	Detail Provided
A. The time, date, nature, duration, and location of the incident (including Lease and review reporting requirements);	
B. The location of the place where pollution is occurring or is likely to occur;	
C. The nature, the estimated quantity or volume and the concentration of any pollutants if known;	
D. The circumstances in which the incident occurred (including the cause of the incident, if known);	
E. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution if known;	
F. Other information prescribed by the regulations.	

## A.2 Agency Notifications

Agency	Date	Time	Agency Contact Person	Reference Number	Agency comments or further action
EPA – Environmental Line – 131 555					
Ministry of Health – Newcastle Office – 02 4924 6477 (ask for Public Health Officer on call) or if unavailable call 1300 066 055					
SafeWork NSW (formerly WorkCover) – 131 050 – Option 1					
Muswellbrook Shire Council – 02 6549 3700 (24 hrs)					
Fire and Rescue – 1300 729 579 ( <i>Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.</i> )					
<b>Additional as per other Project Approvals:</b>					
Department of Planning, Housing and Infrastructure – 02 6575 3400 or 1300 305 695 Email: compliance@planning.nsw.gov.au/Portal					
NSW Resource Regulator –1300 814 609 (operates 24/7) or 02 4063 6666					
Department of Climate Change, Energy, the Environment & Water -					

**Number:** MANOC-1772150304-1830  
**Owner:** Coordinator – Environment & Community

**Status:** Approved  
**Version:** 30.0

**Effective:** 30/03/2026  
**Review:** 30/03/2027

Agency	Date	Time	Agency Contact Person	Reference Number	Agency comments or further action
environment.compliance@dceew.gov.au or call 1800 110 395 (9 am - 5 pm)					
Natural Resource Access Regulator (NRAR) (urgent water compliance matters only) – 1800 633 362 or nrar.enquiries@nrar.nsw.gov.au					



# Appendix B - PIRMP Test Record Form

## PIRMP Test Record Form

COAL ASSETS  
AUSTRALIA

GLENCORE

Instructions			
<p>As required in the Protection of the Environment Operations (POEO) Act 1979, each operations Pollution Incident Response Management Plan (PIRMP) must be tested within 30 days of an incident causing or threatening material harm to the environment occurring.</p> <p>GCAA's NSW operations are required to test their PIRMP within 30 days of any reportable environmental incident to the EPA or DPE. In addition to this requirement all PIRMPs must be tested annually, either through a desktop analysis or an environmental emergency drill.</p>			
PIRMP Test Record			
Person completing this record:	Annemieke Grosser		
Is the PIRMP being tested as a result of an incident?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Incident Date:		CMO Event ID:	
Is the PIRMP being tested as part of an environmental emergency drill?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Emergency Drill Date:	02/03/2026	CMO Event ID:	2026030456.0
Description of incident:			
<p>Desktop Test Scenario: On Monday 2<sup>nd</sup> March, sediment laden water discharged from the MNSD2 sediment dam, across Wybong Road and into Big Flat Creek. This was following a heavy rainfall event (~150mm received in 2 hours). It was found the pump had a cracked housing and was not operational at the time. A plan was in place to swap pump out week commencing 2/3/26 with the replacement pump sitting nearby but no crane available to position it in place. The rain event of this magnitude was not forecast and was generated by a slow-moving storm cell. Dam level sensor and cameras were not operational due to relying on pump circuit for power (which was isolated due to pending pump swap).</p>			
Is the PIRMP readily available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are all procedures associated with the PIRMP readily available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are all procedures associated with the PIRMP current?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Is all internal contact information in the PIRMP correct (including appendices)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Is all external contact information in the PIRMP correct (including appendices)? <i>See action</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Has the stakeholder register been reviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>If yes, when was the stakeholder register reviewed?</p> <p>11/02/2026 – mine owned tenants (latest always available through commercial team)                  24/11/2025 – Private residences (via mitigation register – updated quarterly). Also checked as part of Annual Stakeholder Engagement Plan development.</p>			

Number: GCAA-625378177-10354

Owner: Manager-Environment and Climate Change

Status: Approved

Version: 5.0

Effective: 10/04/2024

Review: 10/04/2027

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Uncontrolled unless viewed on the intranet

**PIRMP Amendments or updates**

Please list below any amendments or updates required in the PIRMP as a result of this testing.

Action	Responsible	Completed	Due
The Agency details listed in the Protocol for industry notification of pollution incidents are included and correct.  Review additional agency details for name changes.  Consider adding additional agencies for consistency with other Environmental Approvals/Plans (or reference to other agency notification considerations).	A. Grosser	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	30/03/2026
Annual update required for PIRMP post approval of this PIRMP test. Full Review + test outcomes considered.	A. Grosser	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	30/03/2026
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

Actions from this review that cannot be completed immediately must be captured in CMO action tracking to ensure completion.

**Test Record Sign off**

Person Completing the Testing:	Annemieke Grosser	Date:	02/03/2025
Approval of Testing:	Robyn Ellis <i>Ows</i>	Date:	03/03/2025
Operations Managers Approval:	Jacob Hundertmark <i>Jace</i>	Date:	10/03/2025

This record form, once completed and approved, must be published on the site Intranet and attached to the CMO Event Record to ensure the record is stored securely