

STRATFORD MINING COMPLEX Pollution Incident Response Management Plan

STRATFORD MINING COMPLEX

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



Revision Status Register

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1 INTRODUCTION

Stratford Coal Pty Ltd (SCPL), a wholly owned subsidiary of Yancoal Australia Limited (Yancoal), owns the Stratford Coal Mine (SCM), which is located approximately 100 kilometres (km) north of Newcastle, New South Wales (NSW). SCPL also owns the Bowens Road North Open Cut (BRNOC), located to the immediate north of the SCM. The SCM and BRNOC are collectively referred to as the Stratford Mining Complex (SMC).

Yancoal also owns the Duralie Coal Mine (DCM), which is located approximately 20 km south of the SMC. Prior to the closure of the DCM in December 2021, run-of-mine (ROM) coal from the DCM was transported by rail to the SMC for processing and export.

The SMC was in continuous operation between 1995 and 2024. Mining activities approved under the SCM Development Consent and the BRNOC Development Consent were suspended in mid-2014, however, the export of product coals continued under the SCM Development Consent. The Development Consent SSD-4966 for the Stratford Extension Project (SEP) was granted on 29 May 2015 and involved the extension and continuation of mine operations at the SMC¹.

In July 2024 the SMC transitioned into mine closure with the cessation of mining operations and is undertaking rehabilitation activities including bulk earthworks.

Rehabilitation at the SMC has been undertaken progressively over the life of the mine, with overburden emplacements and backfilled pits shaped and rehabilitated as areas become available.

A full SEP description, including baseline data and a history of operations, is provided in the SMC Rehabilitation Management Plan and SEP Project EIS.

The general arrangement of the approved SMC is provided in **Figure 1**.

CURRENT STATUS OF THE STRATFORD MINING COMPLEX

SCPL has commenced the mine closure phase following the cessation of mining operations and coal processing activities of run-of-mine (ROM) coal in July 2024.

Key activities of the mine closure phase include:

- Undertaking technical studies and site investigations to address closure knowledge gaps and develop detailed decommissioning and rehabilitation execution plans that will deliver optimal rehabilitation outcomes at the site;
- Infrastructure decommissioning and demolition;
- Bulk rehabilitation earthworks (which may include blasting to achieve final landform design);
- Revegetation of final landform in accordance with the Rehabilitation Management Plan;
- Removal of all mining fleet, major earthworks fleet and drilling fleet from the SMC; and
- Refinement of monitoring programs and environmental management plans to reflect rehabilitated site.

This Pollution Incident Response Management Plan (PIRMP) applies to all aspects associated with mine closure and rehabilitation at the SMC including offset areas and buffer lands.

Accordingly, following the completion of rehabilitation earthworks, SCPL would seek the NSW Department of Planning, Housing and Infrastructure's (DPHI's) (previously the Department of Planning,

¹ A copy of the Development Consent (and other statutory State and Federal licenses and approvals) is available on the Stratford Coal website (www.stratfordcoal.com.au).

Industry and Environment (DPIE)) agreement and approval of redundancy of this PIRMP and associated conditions in SSD-4966.

1.1 PURPOSE AND SCOPE

The Pollution Incident Response Management Plan (**PIRMP**) has been prepared by SCPL, in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997* (**POEO Act**) and Part 3A of the *Protection of the Environment Operations (General) Regulation 2022* (**Regulation**). SCPL hold Environment Protection Licence (**EPL**), EPL 5161 for the Stratford Mining Complex. The EPL covers the following scheduled activities:

1. EPL 5161 - Coal Works and Mining for Coal (Stratford)

The objectives of the PIRMP are to provide SMC personnel and the local community, with:

- a system designed to manage and report any potential pollution incidents to which EPL 5161 relates;
- chemical, physical and toxicological information regarding potential site contaminants and/or hazardous substances that may be encountered in the event of a pollution incident;
- information regarding the main exposure pathways of potential site contaminants or hazardous substances they may encounter during possible pollution incidents; and
- practical methods to eliminate or reduce potential pollution incidents to 'as low a level as is practicable'.

The SMC Environmental Management Structure is shown on **Figure 2**.

1.2 DEFINITION OF A POLLUTION INCIDENT AND MATERIAL HARM

The POEO Act defines a **'pollution incident'** as being:

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

The POEO Act defines **'pollution'** in the following terms:

'pollution' means:

- (a) water pollution, or
- (b) air pollution, or
- (c) noise pollution, or
- (d) land pollution.

Note:

water pollution or **pollution of waters** means:

- (a) 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, or
- (b) placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any refuse, litter, debris or other matter, whether solid or liquid or gaseous, so that the change in the condition of the waters or the refuse, litter, debris or other matter, either alone or together with any other refuse, litter, debris or matter present in the waters makes, or is likely to make, the waters unclean, noxious, poisonous or impure, detrimental to the health, safety, welfare or property of persons, undrinkable for farm animals, poisonous or harmful to aquatic life, animals, birds or fish in or around the waters or unsuitable for use in irrigation, or obstructs or interferes with, or is likely to obstruct or interfere with persons in the exercise or enjoyment of any right in relation to the waters, or
- (c) placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter,

and, without affecting the generality of the foregoing, includes:

- (d) placing any matter (whether solid, liquid or gaseous) in a position where:
 - (i) it falls, descends, is washed, is blown or percolates, or
 - (ii) it is likely to fall, descend, be washed, be blown or percolate,

into any waters, onto the dry bed of any waters, or into any drain, channel or gutter used or designed to receive or pass rainwater, floodwater or any water that is not polluted, or

- (e) placing any such matter on the dry bed of any waters, or in any drain, channel or gutter used or designed to receive or pass rainwater, floodwater or any water that is not polluted, if the matter would, had it been placed in any waters, have polluted or have been likely to pollute those waters.

waters means the whole or any part of:

- (a) any river, stream, lake, lagoon, swamp, wetlands, unconfined surface water, natural or artificial watercourse, dam or tidal waters (including the sea), or

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- (b) any water stored in artificial works, any water in water mains, water pipes or water channels, or any underground or artesian water.

air pollution means the emission into the air of any air impurity

land pollution or **pollution of land** means placing in or on, or otherwise introducing into or onto, the land (whether through an act or omission) any matter, whether solid, liquid or gaseous:

- (a) that causes or is likely to cause degradation of the land, resulting in actual or potential harm to the health or safety of human beings, animals or other terrestrial life or ecosystems, or actual or potential loss or property damage, that is not trivial, or
- (b) that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter, but does not include placing in or on, or otherwise introducing into or onto, land any substance excluded from this definition by the regulations.

The POEO Act, Section 147 defines the meaning of '**material harm to the environment**' as being:

(1) For the purposes of this Part:

(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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

1.3 STRUCTURE OF THE PIRMP

The PIRMP is structured as follows:

Section 2:	Describes the review and update of the PIRMP.
Section 3:	Outlines the statutory requirements applicable to the PIRMP.
Section 4:	Outlines the pollution incident notification process of the PIRMP.
Section 5:	Describes how SCPL will communicate any incidents with the community.
Section 6:	Outlines the responsibilities and duties of personnel.
Section 7:	Outlines how an incident will be reported to the authorities.
Section 8:	Discusses the potential pollutants on site.
Section 9:	Inventory of Potential Pollutants.
Section 10	Outlines the process for the risk assessment undertaken.
Section 11:	Describes how training will be managed.
Section 12:	Describes the annual audit and testing of the PIRMP.
Section 13:	Provides a Contingency Plan to manage any unpredicted impacts and their consequences.
Section 14	Outlines the management and reporting of complaints.
Section 15	Describes how SCPL will deal with any non-compliance of statutory requirements.
Section 16	Figures and Appendices

2 PIRMP REVIEW AND UPDATE

The PIRMP must be at all times kept at the premises to which EPL 5161 relates and be implemented in the case of an incident. In accordance with Clause 98E of the Regulation the PIRMP must be tested every twelve (12) months, and within one (1) month of any pollution incident.

If necessary after every test, the PIRMP will be revised to the satisfaction of the NSW Environmental Protection Agency (EPA), to ensure the PIRMP is updated on a regular basis and to incorporate any recommended measures to improve environmental performance.

The PIRMP is to be reviewed and updated as required if one or any combination of the following occurs:

- annually; or
- when a potential pollutant or chemical is introduced to the site that may be stored in quantities that may cause a pollution incident; or
- when a potentially polluting activity that may cause a pollution incident changes or commences on the premises to which EPL 5161 relate; or
- when a regulating authority requests the PIRMP to be updated.

The revision status of this PIRMP is indicated on the title page of each copy. The distribution register for controlled copies of the PIRMP is described in **Section 2.1**.

2.1 DISTRIBUTION REGISTER

In accordance with Clause 98D of the Regulation, SCPL will make the PIRMP publicly available on the Stratford Coal website. A hard copy of the PIRMP will also be maintained at the Stratford Coal Mine site and will be provided to all personnel responsible for implementing the PIRMP.

SCPL recognises that various agencies have different distribution requirements, both in relation to whom documents should be provided to and in what format. The following details how the PIRMP will be distributed:

- **NSW EPA** - electronic and hard copy;
- **Stratford Coal Mine employees** - local computer network access will be able to view the controlled electronic version of this PIRMP on the company local area network (intranet) and Stratford Coal website; and
- **Public** - available on the Stratford Coal Website.

Please note that SCPL will not be responsible for maintaining uncontrolled copies beyond ensuring the most recent version is maintained on Stratford Coal Mine computer system and the Stratford Coal website.

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3 STATUTORY REQUIREMENTS

SCPL statutory obligations for its operations are contained in:

- i) the conditions of EPL 5161;
- i) the conditions of the NSW Development Consent;
- ii) relevant licences and permits, including conditions attached to mining leases; and
- iii) other relevant legislation.

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Regulation. In summary, these require the following:

- section 153A of the POEO Act, requires all holders of environment protection licences (EPLs) to prepare a Pollution Incident Response Management Plan (PIRMP) by 1 September 2012.
- the PIRMP must include the information detailed in the Section 153C of the POEO Act and be in the form required by the POEO(G) Regulation (clause 98B).
- SCPL must keep the PIRMP at the premises to which the EPL5161 relates in accordance with section 153D of the POEO Act.
- SCPL must test the PIRMP in accordance with Clause 98E of the Regulation.
- if a pollution incident occurs in the course of an activity so that *material harm* to the environment is caused or threatened, SCPL must immediately implement the PIMRP (section 153F, POEO Act).

Section 148 of Part 5.7 of the POEO Act, requires that a person carrying on the activity must, immediately after the person becomes aware of a pollution incident causing or threatening material harm to the environment; notify each relevant authority of the incident and all relevant information about it.

The requirements for SCPL's PIRMP are identified in **Table 3-1**.

Table 3-1 Pollution Incident Response Management Plan Requirements

Requirement	PIRMP Section
Notification Procedures - <i>POEO Act Section 148, 149</i>	Section 4 and 5 and Flow chart in Appendix C
Action to be taken following a pollution incident- <i>POEO Act Section 153C (b) and POEO Reg 98C (1)(l)</i>	Risk Assessment in Appendix A and Section 4 and Appendix C
Procedures for coordinating with the EPA, Local Council, Ministry of Health, WorkCover Authority and Fire and Rescue NSW - <i>POEO Act Section 153C (c)</i>	Flow chart in Appendix C , Pollution Incident Notification Form and Authorities Notification Form in Appendix B
Description of hazards to human health or environment associated with the relevant activity - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(a) and (b)</i>	Section 10 and Risk Assessment in Appendix A
Likelihood of hazards occurring - <i>POEO Act Section 153C (d)</i>	Section 10 and Risk Assessment in Appendix A
Pre-emptive actions to minimise or prevent risk of harm to human health or environment - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(c)</i>	Section 10 and Risk Assessment in Appendix A
Inventory of potential pollutants - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(d) and (e)</i>	Section 9 and Hazardous Chemical Inventory in Appendix D
Maximum quantity of pollutant to which the licence relates - <i>POEO Act Section 153C (d)</i>	Hazardous Chemical Inventory in Appendix D
Safety equipment to minimise the risks to human health or environment - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(f)</i>	Section 10.1.3 and Figure 3
Names, positions and contact details - <i>POEO Act Section 153C (d)</i>	Flow chart in Appendix C
Contact details of each relevant authority - <i>POEO Act Section 148 and POEO Reg 98C(1)(g) and (h)</i>	Flow chart in Appendix C
Early warning mechanisms for people off-site - <i>POEO Act Section 153C(a),(d) and POEO Reg 98C(1)(i)</i>	Section 5
Arrangements for minimising risk of harm to persons on the premises - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(j)</i>	Risk Assessment in Appendix A
Training - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(m)</i>	Section 10
Testing of PIRMP - <i>POEO Act Section 153C (d), and Section 153E POEO(G) Reg (CI 98E)</i>	Section 12
Updating of PIRMP - <i>POEO Act Section 153F and POEO(G) Reg 98E</i>	Section 2 and Section 12
Manner in which PIRMP is tested and maintained - <i>POEO Act Section 153C (d)</i>	Section 2 and Section 12 and Pollution Incident Response Management Plan Audit Appendix B
Detailed maps - <i>POEO Reg 98C (1)(k)</i>	Figures 1, 2 and 3

3.1 LICENCES, PERMITS AND LEASES

In addition to the above legislative requirements, all activities at or in association with the SMC will be undertaken in accordance with the following licences, permits and leases which have been issued or are pending issue (**Table 3-2**).

Table 3-2 List of Current Consents, Lease and Licences

Instrument	Relevant Authority	Date of Grant	Duration of Approval
Development Consent (SSD-4966)	Department of Planning, Housing and Infrastructure (DPHI) (previously the Department of Planning, Industry and Environment (DPIE)).	29/05/2015	The Applicant may carry out mining operations on the site until 31 December 2025.
ML1528	Resources Regulator	20/1/2003	21 years from renewal on 30/07/2023.
ML1447	Resources Regulator	1/4/1999	21 years from renewal on 14/03/2023.
ML1409	Resources Regulator	7/1/1997	21 years from renewal on 07/01/2018.
ML1577	Resources Regulator	1/3/2006	21 years.
ML1360	Resources Regulator	22/12/1994	21 years from renewal on 21/12/2015.
ML1538	Resources Regulator	25/6/2003	21 years from renewal on 31/08/2023.
ML1521	Resources Regulator	24/9/2002	21 years from renewal on 24/09/2023.
ML 1733	Resources Regulator	8/4/2016	21 years.
ML 1787	Resources Regulator	05/06/19	21 years.
Environment Protection Licence (EPL) 5161	NSW Environment Protection Authority (EPA)	9/1/2001	Until the licence is surrendered, suspended or revoked. The licence is subject to review every three years.
Exploration Authorisation (AUTH) 311	Resources Regulator	14/10/2013	Expired and called on 17 September 2024.
AUTH 315	Resources Regulator	14/10/2013	Renewed 21/12/2022 for period up to 18 January 2027.
Monitoring and test bore licences	DPIE-Water	Various	Various.
WAL 41534	NSW Government Water (previously DPIE-Water)	18/04/2018	Perpetuity.
WAL 41535	NSW Government Water	14/12/2017	Perpetuity.
WAL 41536	NSW Government Water	14/12/2017	Perpetuity.
WAL 41537	NSW Government Water	22/01/2018	Perpetuity.
WAL 41538	NSW Government Water	22/01/2018	Perpetuity.

3.2 FAILURE TO COMPLY

All aspects of the PIRMP **must** be complied with. All requirements are outline in **Table 3-1**. Penalties are outlined in **Table 3-3**.

Table 3-3 Penalties for not complying with the POEO Act

Requirement	Description	Maximum Penalty
Notification	A person who contravenes Part 5.7 of the POEO Act (duty to notify pollution incidents) is guilty of an offence.	(a) in the case of a corporation— \$2,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues, or (b) in the case of an individual— \$500,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues.
Preparation of the PIRMP	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.	(a) in the case of a corporation— \$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or (b) in the case of an individual— \$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.
Compliance	The EPA requires the occupier of premises at which industry is carried out to prepare a PIRMP that complies with Part 5.7A (Duty to prepare and implement pollution incident response management plans) of the POEO Act in relation to activities at the premises	(a) in the case of a corporation— \$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or (b) in the case of an individual— \$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.
Keeping of PIRMP on premises	A person who is required to prepare a PIRMP under Part 5.7A (Duty to prepare and implement pollution incident response management plans) of the POEO Act must ensure that it is kept at the premises to which the relevant environment protection licence relates.	(a) in the case of a corporation— \$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or (b) in the case of an individual— \$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.
Testing of the PIRMP	A person who is required to prepare a PIRMP under Part 5.7A (Duty to prepare and implement pollution incident response management plans) of the POEO Act must ensure that it is tested in accordance with the regulations.	(a) in the case of a corporation— \$1,000,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues, or (b) in the case of an individual— \$250,000 and, in the case of a continuing offence, a further penalty of \$60,000 for each day the offence continues.
Implementation of the PIRMP	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 13 of the PIRMP) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by Part 5.7A (Duty to prepare and implement pollution incident response management plans) of the POEO Act.	(a) in the case of a corporation— \$2,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues, or (b) in the case of an individual— \$500,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues.

4 NOTIFICATION OF POLLUTION INCIDENTS

The *POEO Act, Section 148*, requires that a person carrying on the activity must, immediately after the person becomes aware of a pollution incident causing or threatening material harm to the environment; notify each relevant authority of the incident and all relevant information about it.

SCPL will report any pollution incidents or exceedances of EPL 5161 in accordance with Part 5.7 of the POEO Act and relevant conditions of EPL 5161. Pollution incidents that are considered to cause or have the potential to cause material harm to the environment (see definition in **Section 1.2**) will be reported immediately to the relevant authorities in the PIRMP flowchart (**Appendix C** and **Section 4**).

The procedure to follow in the event of an incident is described in the PIRMP flowchart in **Appendix C**. Following an incident, the Environment & Community Superintendent must be contacted immediately to determine the risk to the environment (see Flowchart in **Appendix C**). Pollution incidents (as defined in **Section 1.2**) that cause or threaten material harm to the environment must be reported immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council as described in the flow chart in **Appendix C**. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. Information relating to the pollution incident that is unknown in the first notification instance, and later becomes known, must also be given to the relevant authority immediately.

Minor pollution incidents or statutory non-compliances which are not considered to cause material harm to the environment (as described in **Section 1.2**) are to be reported to the Environment & Community Superintendent and notified to relevant authority as described in **Section 4.2** and any other agencies where required.

4.1 REPORTING REQUIREMENTS

The relevant information to be provided to the EPA about a pollution incident required under *section 150 of the POEO Act*, consists of the following:

- (a) the time, date, nature, duration and location of the incident,
- (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 involved, 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.

This information will be recorded in the **Pollution Incident Notification Form** and submitted / communicated to the Person Authorised to Activate the PIRMP. The Person Authorised to Activate the PIRMP will complete the notifications using the **Authorities Notification Form** in **Appendix B**.

Further, in accordance with *Section 153C of the POEO Act 1997*, the appropriate action to be taken immediately after a pollution incident is identified, must be implemented for that particular pollution incident. Incident response advice from the authorities notified is to be enacted upon in liaison with the relevant authorities.

4.2 MINOR INCIDENTS & STATUTORY NON-COMPLIANCES

Any minor pollution incidents or statutory non-compliances unlikely to pose a threat to the environment that constitutes the definition as described in **Section 1.2** of this PIRMP, will be reported to the Environment & Community Superintendent and notified to the relevant authority in accordance with EPL

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5161 and further notification to other agencies as required by the SMC Environmental Management Strategy (EMS).

In the event that an incident is deemed by the Environmental & Community Superintendent to be unlikely to pose a threat to the environment that constitutes the definition as described in **Section 1.2** of this PIRMP, then the following steps are to be undertaken.

1. Complete incident report form.
2. Assess best clean-up/response procedures for each incident based on the nature of the incident, product type and site issues in coordination with the E&C Superintendent or relevant supervisor.
3. Remove and contaminated material or sources of pollution, including used spill control equipment, to an appropriate place within the licensed premises for licensed waste disposal and/or remediation.

4.3 INCIDENT RESPONSE AND FOLLOW UP ACTIONS

The procedure to follow in the event of an incident is described in the PIRMP flowchart in **Appendix C**.

In accordance with *Section 153C of the POEO Act 1997*, the appropriate action to be taken immediately after a pollution incident is identified, must be implemented for that particular pollution incident. Incident response advice from the authorities notified is to be enacted upon in liaison with the relevant authorities.

Subsequent to an incident, either material (**Section 4**) or minor (**Section 4.2**), the following must be undertaken:

- implement actions to reduce or control any further pollution/environmental impacts.
- undertake further monitoring/ testing if required.
- complete incident report (Appendix B).
- implement any necessary clean-up and remediation measures.
- complete government reporting requirements and any follow-up reporting, as necessary.
- record and implement corrective actions to avoid reoccurrence of incident.
- organise restocking of any incident management or spill control equipment.
- review the effective implementation of the PIRMP.
- test the PIRMP within one month of the incident.

5 COMMUNICATING WITH THE COMMUNITY

SCPL takes a risk based approach to the management of all risks associated with pollution incidents. Having assessed these risks SCPL asserts that the following community notification procedures are adequate:

- person Authorised to Activate the PIRMP will immediately notify specific residences/sensitive receivers that have the potential to be impacted by a pollution incident.
- notification in conjunction with authorities and emergency services, as necessary.
- notification via Stratford Coal Website (www.yancoal.com.au/our-sites/stratford), as necessary.

Where an early warning of an incident is necessary, notification to the community will include instructions for mitigation of the pollution incident, such as to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water in creeks or rivers affected, or likely to be affected, by a pollutant discharge. The procedures outlined in the Stratford Coal Emergency Management Principal Control Plan and Emergency Response Procedure are to be followed when notifying the community of any pollution incidents.

Specific residents that have the potential to be impacted by a pollution incident will be provided regular updates as information becomes available during and following the incident. The procedures outlined in the Emergency Response Procedure are to be followed when notifying the specific residents of additional information regarding a pollution incident.

6 RESPONSIBILITIES AND DUTIES

If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment (within the meaning outlined in **Section 1.2**) is caused or threatened, the person carrying out the activity must immediately implement this PIRMP and notify the person authorised to activate the PIRMP. In the event that the person authorised to activate the PIRMP is not able to be contacted, the person notifying the incident must complete the Pollution Incident Notification Form (**Appendix B**) and use the Authorities Notification Form (**Appendix B**) and notify authorities in accordance with *Section 148 (3) of the POEO Act*. The flowchart in **Appendix C** outlines the key steps in responding to a Pollution Incident.

Requirement	Responsible person
Notification Procedures - <i>POEO Act Section 148, 149</i>	Section 4 and 5 and Flow chart in Appendix C
Duty to implement this PIRMP.	The person carrying out the activity who becomes aware of an incident
Duty to immediately notify supervisor and Person authorised to activate the PIRMP.	The person carrying out the activity who becomes aware of an incident
Duty to complete the Pollution Incident Notification Form .	The person carrying out the activity who becomes aware of an incident
Person authorised to activate the PIRMP	Environment & Community Superintendent or Operation Manager
Duty to complete the Authorities Notification Form and notify all relevant authorities immediately.	Environment & Community Superintendent or Operation Manager
Duty to implement incident response measures	In accordance with Stratford Coal Emergency Management Principal Control Plan

7 WRITTEN REPORTING REQUIREMENTS

The manner and form of notifying pollution incidents is described under *section 150 of the POEO Act*.

SCPL will provide written reports following the initial notification of any pollution incidents in accordance with the conditions of. EPL 5161. Condition R2.2 of EPL 5161 states that the licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Further, Condition R3 of EPL 5161 provides the information which is required to be provided in the written report. EPL 5161 Condition R3.3 states a written report which includes any or all of the following information:

- the cause, time and duration of the event;
- the type, volume and concentration of every pollutant discharged as a result of the event;
- the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;

- d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- g) any other relevant matters.

8 POTENTIAL POLLUTANTS

Various substances have the potential to become a pollutant if it is of a sufficient quantity and / or is impacting a sensitive environmental or community receptor. SCPL has employed a risk based approach in the development of the PIRMP to ensure that all substances that have the potential to cause material harm are assessed prior to use (within the meaning outlined in **Section 1.2**). This PIRMP has not included in the pollution incident risk assessment, chemicals that are essentially benign in nature and / or are stored in such low quantities that they pose a low risk to cause a pollution incident as defined in the POEO Act.

A range of chemicals are utilised at the SMC. They are used for a number of purposes including but not limited to cleaning and machinery maintenance. The majority of the chemicals stored on site are in small quantities. Due consideration is given to appropriate storage of chemicals. A list of potential pollutants and the maximum quantities stored on site is available in **Appendix D**.

Chemicals (including fuels) with large volumes stored at the SMC are contained within a bunded area on a concrete sealed surface. Potential pollutants and chemicals that are stored on site that have the potential to cause a major incident as defined in **Section 1.2** have been included in the Risk Assessment in **Appendix A**. Other chemicals stored on site that are considered a low risk of causing a pollution incident (as defined in **Section 1.2**) due to the quantities stored on site, are not included in the Risk Assessment.

In addition to chemical and fuel storage on site, environmental emergencies such as flooding or dam failure (sediment and water storage) and serious vehicle incidents are identified within the Risk Assessment (**Appendix A**).

SCPL takes all due care to manage risks, however, the risk based approach accounts for potential failure in the management measures and assesses the possible consequence if these measures fail. Chemicals or activities that may have the potential to cause a pollution incident as defined in **Section 1.2**, (if the management measures fail) are deemed a 'high risk' or 'extreme risk' and are highlighted in yellow.

9 INVENTORY OF POTENTIAL POLLUTANTS

A list of hazardous substances and the maximum quantities stored on site is available in **Appendix D**.

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10 RISK ASSESSMENT

The Risk Assessment in **Appendix A** has evaluated the potential pollution incidents and likelihood of the pollutant causing harm and the severity of that harm. It has been undertaken in conjunction with those who have the potential to be affected by the pollutant.

In preparing the Risk Assessment, the following activities were undertaken:

1. Evaluate the likelihood of a spill occurring and the likely severity of that spill, using the risk assessment matrix to assign a risk rating (Yancoal Formal Risk Assessment Template).
2. Identify the factors that may be contributing to the risk.
3. Where available, review health and safety information that is relevant to the particular hazard (such as Codes of Practice, WorkCover guidelines and Safety Data Sheets).

The risk assessment methodology used to undertake the risk assessment is outlined in the Yancoal Risk Assessment Standard on Intalex.

SCPL has a procedure for introducing new chemicals to site using Chemaalert, which requires a high level review of the potential risks associated with the introduction to site of the chemical being assessed. Where this high level assessment indicates that it is warranted, the Risk Assessment in the PIRMP will be updated (i.e. where the chemical approval process identified that the chemical is potentially harmful enough).

10.1 HOW RISKS TO HUMAN HEALTH AND THE ENVIRONMENT CAN BE REDUCED

Once risks have been assessed, action must be taken by SCPL personnel (in consultation with other staff, Contractors/Subcontractors, and in some cases, clients) to eliminate or control risks. Whilst the most effective action is to eliminate risks, this is not always possible, so control measures must be implemented according to the hierarchy of control (see below). The Stratford Coal Emergency Management Principal Control Plan outlines the Procedures and Controls for risks associated with an emergency on site.

The Hierarchy of Control will assist in determining the most appropriate course of action to control the risk identified in the Hazard report form. The Hierarchy of Control ranks risk control strategies from the most effective to the least effective. Not all strategies will be practicable and a combination of strategies may be needed to achieve the best protection.

Eliminate the risk (most effective)

Examples of elimination strategies are:

- removing chemicals that are not necessary to operations so that unnecessary high risk chemicals are no longer present on site.

Minimise the risk

a. Substitution

This is achieved by replacing hazardous substances / chemicals with those that are safer.

b. Modification

This is achieved by modifying the workplace or work practices.

c. Isolation

Use of isolation strategies such as redesigning the workspace (e.g. the use of appropriate barriers), to create exclusion zones to prevent harm to workers and others that can potentially be caused by chemicals etc.

Engineering Controls

This is achieved by using mechanical solutions to control the risk such as bunding and concrete sealed surfaces.

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Administrative Controls

Examples of administrative controls are:

- training.
- increasing supervision of staff.
- implementing safe work practices and standard operating procedures.
- job rotation.

Personal Protective Equipment (PPE) (least effective)

Personal protective equipment is the least satisfactory solution to risks as it does not address the hazard but merely provides a shield to protect the employee. It should only be used when it is not reasonably practicable to address the risk any other way or to supplement other risk strategies.

Personal protective equipment and clothing must be:

- carefully selected and appropriate for the task.
- correctly fitted and comfortable to wear.
- always worn where indicated/instructed.

Examples of personal protective equipment are:

- gloves, safety glasses, protective footwear, ear plugs.

10.1.1 PREEMPTIVE ACTIONS TO REDUCE RISK OF HARM

The Risk Assessment contained in **Appendix A** describes how pre-emptive actions can reduce the risk of harm. As required, all relevant SMC personnel and contractors are trained in the appropriate use of safety equipment and devices to minimise possible incidents.

10.1.2 EVENTS THAT MAY INCREASE THE LIKELIHOOD OF AN INCIDENT OCCURRING

The risks outlined in **Appendix A** may be increased in the case of extreme weather conditions (i.e. floods, wind storms, etc.) or human error. Stratford Coal operates under a risk based approach and provides management measures to mitigate the effects from these events through the use of best practices and employee training.

10.1.3 SAFETY EQUIPMENT / DEVICES TO MINIMISE RISK

Activities must be carried out in a competent and responsible manner. This includes the handling, movement and storage of material and substances used to carry out the activity and the transport and disposal of waste generated by the activity. All plant equipment installed at the site or used in connection with the activity is maintained in a proper and efficient condition and operated in a proper and efficient manner.

Refer to the Operations Emergency Response Control Plan and Emergency Response Procedure for full detail of the emergency resources and equipment at SMC. On-Site Emergency Resources and devices include:

- Emergency First Aid Room;
- Emergency Response Team
- Emergency Response Team Equipment (ERT Container and Fire Trailer);

- Fire Fighting Equipment (Hydrants, Reels, Extinguishers, Water Trucks with Cannon and Foam Generation Capability, Self-contained 1000 Litre Water Trailer);
- First Aid Kits;
- Spill Kits;
- Eye Wash Stations;
- Body Wash Station / Safety Showers;
- Mine Site Compliant Light Vehicles (containing fire extinguisher and first aid kit and used to transport personnel and material as required during an emergency); and
- Mobile Lighting Plants.

Off-site emergency resources may also be required to be sourced for an onsite emergency. Stratford Coal currently has an Emergency Response Team (ERT), the members of which are all trained in Mines Rescue and incident/emergency response.

An approved and certified contractor inspects all spill kits monthly and provides a report on the condition of the spill kits and if any replacements are required. **Figure 3** shows the locations of the spill kits and devices for the site.

11 TRAINING

All Staff, employees, contractors and visitors shall be familiarised with the conditions of the PIRMP:

- initially, as part of site induction training;
- then, by periodic refresher training; and
- if there are amendments to these Conditions.

Training in the content of the PIRMP and assessment competency will be conducted as part of the SMC Induction. SCPL staff training for the PIRMP requires the following:

- awareness of the potential for harm to people and the environment from the materials held on-site;
- information on the sensitivity of the environment surrounding the site;
- the environmental responsibilities of SCPL;
- use of the correct personal protective equipment and any appropriate and/or necessary health and safety training;
- reporting procedures if there's a risk of surface water, groundwater or land contamination;
- reporting to the environmental manager of all pollution incidents;
- safe and correct use of all spill clean-up equipment or pollution prevention structures and/or devices on site;
- safe handling and legal disposal of contaminated materials and wastes resulting from an incident, including:
- arrangements for using specialist contractors and services; and
- appropriate and safe decontamination.

12 PIRMP AUDIT AND TESTING

In accordance with POEO(G) Regulation (clause 98E), SCPL will test the PIRMP annually.

The PIRMP must be tested in accordance with the PIRMP Testing Procedure (see **Appendix B**) and results of the test communicated to relevant staff identifying any non-compliance during the testing procedure. Non-compliances are to be followed up immediately and rectified.

Testing should also be carried out within one (1) month of any pollution incident occurring in the course of an activity to which the licence relates. In light of the incident it should be assessed whether the information included in the PIRMP is accurate and up to date and that the PIRMP plan is capable of being implemented in a workable and effective manner. The PIRMP is to be subject to constant review and up to date with contemporary practices and procedures.

12.1 PERFORMANCE INDICATORS

The performance indicator criteria for the PIRMP are:

- the PIRMP is tested every twelve (12) months, and within one (1) month of any material pollution incident (in accordance with Section 98E of the POEO(G) Regulation);
- in accordance with Section 98D of the POEO(G) Regulation, SMC will make the PIRMP publicly available on the Stratford Coal website; and
- the PIRMP is effectively activated if a material harm pollution incident occurs.

The following table considers the requirements of the performance of the PIRMP.

Performance Indicator	Completed (Yes/No)	Undertaken / authorised by	Date
Annual review / audit of PIRMP			
No non-compliant results within audits of PIRMP			
PIRMP available on website			
Following any pollution incidents was the PIRMP implemented successfully			

The results of the testing are to be kept in a PIRMP Performance Register including any requirements for changes to the PIRMP.

12.2 DOCUMENT CONTROL

This document will be a controlled document on the Company Intranet (Intelex) in a suitable format. The Site Health and Safety Coordinator is responsible in ensuring that the most current documents are available.

13 POTENTIAL CONTINGENCY MEASURES

In the event that monitoring of the PIRMP indicates that a non-compliance or issue with implementation of the PIRMP has been identified, SCPL will conduct an investigation, and identify and assess potential rectification measures. Potential rectification measures could include:

- an audit of the PIRMP, including existing management measures;
- identification of potential system improvements such as staff training; and
- the conduct of additional monitoring or review (e.g. increase in frequency) to inform the proposed contingency measures.

14 COMPLAINTS

A protocol for the managing and reporting of complaints has been developed as a component of the SMC Environmental Management Strategy (EMS).

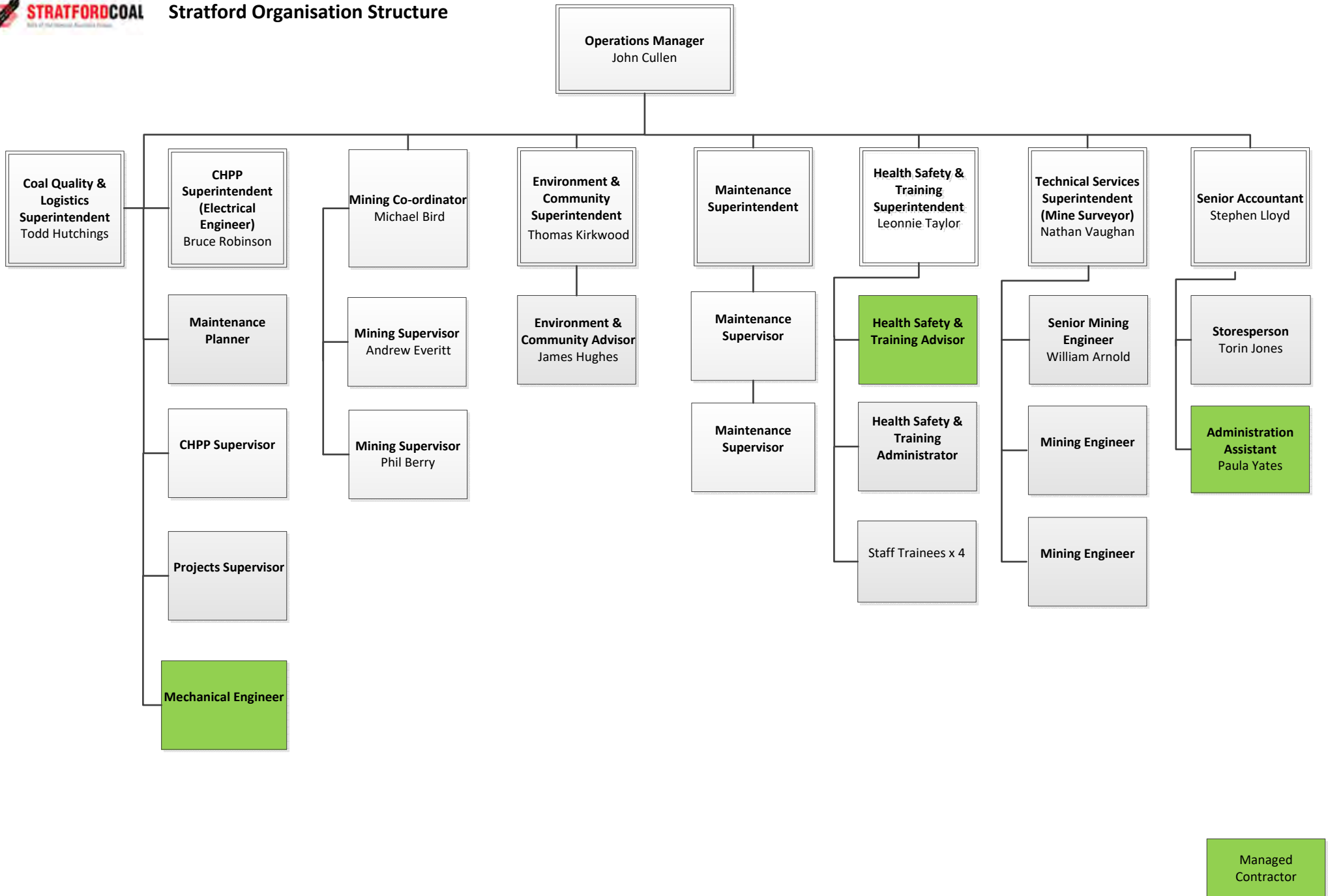
15 NON-COMPLIANCES WITH STATUTORY REQUIREMENTS

A protocol for the managing and reporting of non-compliances with statutory requirements has been developed as a component of the SMC Environmental Management Strategy (EMS).

FIGURES

1-3

Stratford Organisation Structure





APPENDIX A

PIRMP RISK ASSESSMENT

Stratford Coal – Pollution Incident Response Management Plan		
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STRATFORD COAL MINE - PIRMP RISK ASSESSMENT TABLE

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
Liquid Petroleum Gas	May be accidentally left open or mishandled for gas to be released	Air	Air	B	2	12 (M)	Personnel are trained in the use of LPG and in emergency response procedures.	B	2	12 (M)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
Diesel	Diesel tank may leak over a period of time unnoticed or have its integrity compromised and fail	Surface water	Local Creek	B	4	21 (E)	Fuel storage is in suitable container in bunded area located in dirty water area that reports to Parkers Pit. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures. There is a bioremediation facility on site for contaminated soil.	D	4	14 (H)	Follow the Flowchart in Appendix C to activate the PIRMP.
			Nearby residents	D	4	14 (H)	Fuel storage is in suitable container in bunded area located in dirty water area that reports to Parkers Pit. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	E	4	10 (M)	
		Groundwater	Groundwater aquifer	B	4	21 (E)	Fuel storage is in suitable container in bunded area located in dirty water area that reports to Parkers Pit. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	D	4	14 (H)	
		Soil	Local creek	D	3	9 (M)	Fuel storage is in suitable container in bunded area located in dirty water area that reports to Parkers Pit. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures. There is a bioremediation facility on site for contaminated soil.	E	3	6 (M)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
Oil/Fuel Water Separator	May overflow during large wet weather events	Surface water	Local creek	B	2	12 (M)	Separator is located within a dirty water area, drainage reports to on site prescribed dam. Concrete bunded area and personnel are trained in the use of spill kits and emergency response procedures. Routine inspections of separator are conducted.	D	2	5 (L)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	C	2	8 (M)	Separator is located within a dirty water area, drainage reports to on site prescribed dam. Concrete bunded area and personnel are trained in the use of spill kits and emergency response procedures. Routine inspections of separator are conducted.	E	2	3 (L)	
		Groundwater	Groundwater aquifer	C	2	8 (M)	Separator is located within a dirty water area, drainage reports to on site prescribed dam. Concrete bunded area and personnel are trained in the use of spill kits and emergency response procedures. Routine inspections of separator are conducted.	E	2	3 (L)	
		Soil	Groundwater aquifer/Local creek	D	2	5 (L)	Separator is located within a dirty water area, drainage reports to on site prescribed dam. Concrete bunded area and personnel are trained in the use of spill kits and emergency response procedures. Routine inspections of separator are conducted.	E	2	3 (L)	
Paints (stored in work shed)	May be spilt within the work shed or when used on site	Surface water	Local Creek	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	E	2	3 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	
		Soil	Groundwater aquifer	E	2	3 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
		Groundwater	Local creek	E	2	3 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	
Hydraulic Oil - Failure in Machinery	Failure in machinery causing a spill to the environment	Surface water	Groundwater aquifer	B	2	12 (M)	Spill kits available and personnel are trained in the use of spill kits and emergency response procedures. Bioremediation facility on site.	C	2	8 (M)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Local creek	B	3	17 (H)	Spill kits available and personnel are trained in the use of spill kits and emergency response procedures. Bioremediation facility on site.	C	3	13 (H)	
Hydraulic Oil	May be spilt within the work shed or when used on site	Surface water	Local creek	C	2	8 (M)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	C	2	8 (M)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	D	2	5 (L)	
		Soil	Groundwater aquifer	C	2	8 (M)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use. Bioremediation facility available on site.	D	2	5 (L)	
		Groundwater	Local creek	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	
Absorbents (spent oil spill material)	Incorrect disposal	Surface water	Local creek	C	2	8 (M)	All contaminated material is disposed of in appropriate containers supplied or in bioremediation area. Spill kits available with personnel appropriately trained in their use.	D	2	5 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	D	2	5 (L)	All contaminated material is disposed of in appropriate containers supplied or in bioremediation area. Spill kits available with personnel appropriately trained in their use.	E	2	3 (L)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
Gear Lubricant	May be spilt within the work shed or when used on site	Surface water	Local Creek	C	2	8 (M)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	C	2	8 (M)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	
		Soil	Groundwater aquifer	C	2	8 (M)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	
		Groundwater	Local creek	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
Grease	May be spilt within the work shed or when used on site	Surface water	Local Creek	C	2	8 (M)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
		Soil	Groundwater aquifer	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
		Groundwater	Local creek	D	2	5 (L)	Stored in chemical workshop that has a concrete cap. Stored in low quantities and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
Water Storage Dams	May overflow during extreme wet weather events or have its integrity compromised and fail	Surface water	Local creek	A	2	16 (H)	Dams have large storage capacity and are monitored regularly. Personnel are trained in emergency response procedures	C	2	8 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	A	1	11 (M)	Dams have large storage capacity and are monitored regularly. Personnel are trained in emergency response procedures	C	1	4 (L)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
		Groundwater	Local creek	D	1	2 (L)	Dams have large storage capacity and are monitored regularly. Groundwater is monitored regularly. Personnel are trained in emergency response procedures	D	1	2 (L)	
Fuel supply trucks (diesel) in the event of a road accident (ON YANCOAL MINING LEASE)	May have an accident whilst entering the site and have fuel released to the environment	Surface water	Local Creek	C	3	13 (H)	Speed limits on road ways, trained drivers, vehicles regularly inspected and maintained.	D	3	9 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	C	3	13 (H)	Speed limits on road ways, trained drivers, vehicles regularly inspected and maintained.	E	3	6 (M)	
		Soil	Groundwater aquifer	C	3	13 (H)	Speed limits on road ways, trained drivers, vehicles regularly inspected and maintained.	D	3	9 (M)	
		Groundwater	Local creek	D	3	9 (M)	Speed limits on road ways, trained drivers, vehicles regularly inspected and maintained.	E	3	6 (M)	
Coal trains leaving the surface facilities area (whilst still on Yancoal property)	May have an accident leaving the surface facilities area (whilst still on Yancoal property)	Surface water	Local creek	D	4	14 (H)	Speed limits on rail lines, limited nearby receptors, ballast regularly checked and cleaned	E	4	10 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	D	3	9 (M)	Speed limits on rail lines, limited nearby receptors, ballast regularly checked and cleaned	E	3	6 (M)	
		Soil	Groundwater aquifer	D	3	9 (M)	Speed limits on rail lines. Unlikely to penetrate to groundwater aquifer through the soil profile	E	3	6 (M)	
		Groundwater	Local creek	D	3	9 (M)	Speed limits on rail lines. Unlikely to penetrate to groundwater aquifer through the soil profile	E	3	6 (M)	
Sewage	May back up during extreme wet weather events or have a pipe leak or burst or over irrigation.	Surface water	Nearby residents	C	4	18 (H)	Fully enclosed pipeline. Regular inspection and maintenance program. Spill kits available in the event of a sewage back up.	D	3	9 (M)	Any overflows, leaks or broken pipes report immediately to Environment Manager.
			Local creek	C	4	18 (H)	Fully enclosed pipeline. Regular inspection and maintenance program. Spill kits available in the event of a sewage back up.	D	4	14 (H)	
		Groundwater	Local creek	C	3	13 (H)	Fully enclosed pipeline, groundwater monitored therefore any leaks may be detected early. Regular inspection and maintenance program	D	3	9 (M)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
			Groundwater aquifer	C	2	8 (M)	Fully enclosed pipeline, groundwater monitored therefore any leaks may be detected early. Regular inspection and maintenance program	D	2	5 (L)	
Effluent removal trucks (possible onsite accident)	May have an accident leaving the surface facilities area (whilst still on Yancoal property)	Surface water	Nearby residents	C	3	13 (H)	Speed limits on road ways. Personnel are trained in the use of spill kits and emergency response procedures.	D	3	9 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Local creek	C	4	18 (H)	Speed limits on road ways. Personnel are trained in the use of spill kits and emergency response procedures.	D	4	14 (H)	
		Groundwater	Local creek	D	3	9 (M)	Speed limits on road ways. Personnel are trained in the use of spill kits and emergency response procedures.	E	3	6 (M)	
			Nearby residents	D	2	5 (L)	Speed limits on road ways. Personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
Flocculants (storage)	An extreme rain event may wash flocculants into water diversion drains. Further, high winds may impact the air quality on site.	Surface water	Local creek	C	2	8 (M)	Reports to Parker's Pit storage dam. Spill kits available. personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan.
			Nearby residents	D	2	5 (L)	Reports to Parker's Pit storage dam. Spill kits available. personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	
			Groundwater aquifer	D	2	5 (L)	Reports to Parker's Pit storage dam. Spill kits available. personnel are trained in the use of spill kits and emergency response procedures.	D	2	5 (L)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
		Groundwater	Local creek	D	2	5 (L)	Reports to Parker's Pit storage dam. Spill kits available. personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
Diesel Trucks On Site	On site trucks for filling machinery - possible accident and spill released to the environment.	Surface water	Local creek	C	3	13 (H)	Spill kits available. Personnel are trained in the use of spill kits and emergency response procedures. Employment of qualified personnel.	D	3	9 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	D	3	9 (M)	Spill kits available. Personnel are trained in the use of spill kits and emergency response procedures. Employment of qualified personnel.	D	3	9 (M)	
			Groundwater aquifer	D	3	9 (M)	Spill kits available. Personnel are trained in the use of spill kits and emergency response procedures. Employment of qualified personnel.	D	3	9 (M)	
		Soil	Groundwater aquifer	C	3	13 (H)	Spill kits available. Personnel are trained in the use of spill kits and emergency response procedures. Employment of qualified personnel. Bioremediation facility on site.	D	3	9 (M)	
		Groundwater	Local creek	D	3	9 (M)	Spill kits available. Personnel are trained in the use of spill kits and emergency response procedures. Employment of qualified personnel.	E	3	6 (M)	
Stockpiles / ROM Areas / Crusher - slumps, and excessive runoff, large rain events	There may be slumps, and excessive runoff, large rain events that could possibly enter the clean water separating drain/	Surface water	Local creek	B	4	21 (E)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site. Routine monitoring and pumping at Parker's Pit.	D	4	14 (H)	Report any overflows that are not diverted to storage dams and channels to Environmental Manager. Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	B	4	21 (E)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site. Routine monitoring and pumping at Parker's Pit.	D	4	14 (H)	
		Soil	Groundwater aquifer	C	4	18 (H)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site. Routine monitoring and pumping at Parker's Pit.	D	4	14 (H)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
		Groundwater	Local creek	C	4	18 (H)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site. Routine monitoring and pumping at Parker's Pit.	D	4	14 (H)	
Sediment Dams - overflows and accidentally releases	May overflow during extreme wet weather events or have its integrity compromised and fail	Surface water	Local creek	A	2	16 (H)	Runoff from operational areas are intercepted and channelled to containment storage across the site. Dams have been designed as per the 'Blue Book' and are maintained in accordance with Site Management Plans. Personnel are trained in pumping and emergency response procedures and dams are dewatered within 10 days of a run-off generating rainfall event.	C	2	8 (M)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	A	1	11 (M)	Runoff from operational areas are intercepted and channelled to containment storage across the site. Dams have been designed as per the 'Blue Book' and are maintained in accordance with Site Management Plans. Personnel are trained in pumping and emergency response procedures and dams are dewatered within 10 days of a run-off generating rainfall event.	C	1	4 (L)	
		Groundwater	Local creek	D	1	2 (L)	Runoff from operational areas are intercepted and channelled to containment storage across the site. However, in the case of flood events ponding may cause excessive leaching to groundwater. Dams have been designed as per the 'Blue Book' and are maintained in accordance with Site Management Plans. Personnel are trained in pumping and emergency response procedures and dams are dewatered within 10 days of a run-off generating rainfall event.	D	1	2 (L)	
Unleaded Petrol		Surface water	Local Creek	C	2	8 (M)	Stored on concrete bund and in low quantities. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	C	2	8 (M)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan.
			Nearby residents	D	2	5 (L)	Stored on concrete bund and in low quantities. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
		Groundwater	Local creek	D	2	5 (L)	Stored on concrete bund and in low quantities. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
		Soil	Groundwater aquifer	D	2	5 (L)	Stored on concrete bund and in low quantities. Spill kits available and personnel are trained in the use of spill kits and emergency response procedures.	E	2	3 (L)	
Potential Acid Forming Material Stockpiles	Heavy rain events may cause the material to enter water diversion drains or pond outside of cell.	Surface water	Local creek	B	4	21 (E)	Liming of stockpiles, personnel are trained in contingency plans for heavy rain events	D	4	14 (H)	In the case of a heavy rain event check that no ponding of material has occurred outside of the cells. If there has been ponding and potential leaching through the soil follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	B	4	21 (E)	Liming of stockpiles, personnel are trained in contingency plans for heavy rain events	D	4	14 (H)	
		Groundwater	Local creek	C	4	18 (H)	Liming of stockpiles, personnel are trained in contingency plans for heavy rain events	D	4	14 (H)	
Potential Acid Forming Material encrusted in disused pipelines and bursting of pipes	Heavy rain events may cause the material to enter water diversion drains or pond outside of cell.	Surface water	Local creek	C	3	13 (H)	Runoff from operational areas are intercepted and channelled to containment storage across the site. Storage dams and sediment ponds are regularly tested for pH. Liming of rejects.	D	3	9 (M)	If pH in storage dams or sediment ponds are low (acidic), follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	D	3	9 (M)	Runoff from operational areas are intercepted and channelled to containment storage across the site. Storage dams and sediment ponds are regularly tested for pH. Liming of rejects.	D	3	9 (M)	
		Groundwater	Local creek	D	3	9 (M)	Runoff from operational areas are intercepted and channelled to containment storage across the site to prevent ponding and infiltration to groundwater. Liming of rejects.	D	3	9 (M)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
Stockpiles lime - runoff, large rain events	Heavy rain events may cause the material to enter water diversion drains	Surface water	Local creek	B	2	12 (M)	Not stored in high quantities and placed on concrete pads. Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site.	D	2	5 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan
			Nearby residents	D	2	5 (L)	Not stored in high quantities and placed on concrete pads. Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site.	E	2	3 (L)	
Hydrochloric Acid	Possible spill inside work shed	Surface water	Local creek	D	2	5 (L)	Stored in bunded area in stainless steel containers and limited to 25 litre containers. PPE used for clean ups, Spill kits available following spill.	E	2	3 (L)	Report to Environmental Manager as outlined in PIRMP flowchart. Follow Spill procedure outlined in Yancoal Emergency Management Plan.
		Groundwater	Local creek	D	2	5 (L)	Stored in bunded area in stainless steel containers and limited to 25 litre containers. PPE used for clean ups, Spill kits available following spill.	E	2	3 (L)	
Reject Line	Damaged or burst pipes combined with heavy rain events may cause the material to enter water diversion drains	Surface water	Local creek	B	4	21 (E)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site.	D	4	14 (H)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Groundwater aquifer	D	4	14 (H)	Diversion of waters to Parker's Pit storage dam. Runoff from operational areas are intercepted and channelled to containment storage across the site.	E	4	10 (M)	
Bushfires	Bushfires may encroach onto property with coal and chemicals possibly being set alight	Air	Nearby residents	B	4	21 (E)	Bushfire Management Plan in place. Back burning undertaken regularly, fire breaks slashed, chemicals stored in enclosed areas.	C	4	18 (H)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
		Surface water	Local creek	C	4	18 (H)	Bushfire Management Plan in place. Back burning undertaken regularly, fire breaks slashed, chemicals stored in enclosed areas.	E	4	10 (M)	

Potential Pollutant	Description of Hazard	Potential Release Pathway (Media)	Potential Receptor Pollution Risk	Inherent Risk			Pre-emptive / Management Actions	Managed Risk			Pollution Incident Response
				Likelihood	Consequence	Risk		Likelihood	Consequence	Risk	
			Nearby residents	C	4	18 (H)	Bushfire Management Plan in place. Back burning undertaken regularly, fire breaks slashed, chemicals stored in enclosed areas.	E	4	10 (M)	
			Groundwater aquifer	D	4	14 (H)	Bushfire Management Plan in place. Back burning undertaken regularly, fire breaks slashed, chemicals stored in enclosed areas.	E	4	10 (M)	
Blasting - fume and dust plumes	Blasting may have the potential to cause fume and dust plumes	Air	Nearby residents	A	4	23 (E)	Blast Management Plan in place. Blasts are controlled and conducted by suitably trained personnel.	C	4	18 (H)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Local creek	C	3	13 (H)	Blast Management Plan in place. Blasts are controlled and conducted by suitably trained personnel.	D	3	9 (M)	
Dirty water diversion drains breach	Breach in the integrity of the diversion drains may cause a release to the environment	Surface water	Local creek	B	3	17 (H)	Diversion drains are regularly checked and cleaned out to prevent breaches. personnel are trained in emergency management procedures.	C	3	13 (H)	Follow the Flowchart in Appendix C to activate the PIRMP. Follow the procedure outlined in Section 7.2
			Nearby residents	B	3	17 (H)	Diversion drains are regularly checked and cleaned out to prevent breaches. personnel are trained in emergency management procedures.	C	3	13 (H)	
		Groundwater	Local creek	C	3	13 (H)	Diversion drains are regularly checked and cleaned out to prevent breaches. personnel are trained in emergency management procedures.	D	3	9 (M)	
			Nearby residents	C	2	8 (M)	Diversion drains are regularly checked and cleaned out to prevent breaches. personnel are trained in emergency management procedures.	D	2	5 (L)	

APPENDIX B

POLLUTION INCIDENT NOTIFICATION FORM

PIRMP AUTHORITIES NOTIFICATION FORM

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN AUDIT

Stratford Coal – Pollution Incident Response Management Plan		
Revision No. R-013		
Document ID: Pollution Incident Response Management Plan		



Stratford Coal Mine

Pollution Incident Response Management Plan

Pollution Incident Notification Form

1) INCIDENT DATE & TIME:
2) REPORTED DATE, TIME, NAME & POSITION:
3) INCIDENT LOCATION:
4) ACTIVITY BEING UNDERTAKEN AT THE TIME OF INCIDENT:
5) WHO WAS INVOLVED IN THE INCIDENT:
6) INCIDENT DESCRIPTION & CIRCUMSTANCES (provide accurate information only, if some parameters (i.e. chemical type) are unknown DO NOT SPECULATE):
7) TYPE OF INCIDENT (injury/damage/near miss/environmental):
8) EXTENT OF / POTENTIAL FOR POLLUTION (i.e. quantity of spill, duration if known):
9) MAXIMUM REASONABLE POTENTIAL FOR POLLUTION FROM THESE CIRCUMSTANCES:
10) INITIAL REMEDIAL ACTIONS TAKEN:
11) NOTIFICATION PROVIDED TO (name and position):
12) OTHER INFORMATION



Pollution Incident Response Management Plan

PIRMP Authorities Notification Form

December 2024 update

DATE:
NAME & POSITION:
SITE NAME:
SITE TYPE:

This form is to be used in conjunction with the Pollution Incident Notification Form.

The following authorities **MUST** be contacted following an incident (as described in **Section 4** of the Pollution Incident Response Management Plan):

Authority	Contact details
Environment Protection Agency (EPA)	Pollution Line 131 555 , select Option 1
NSW Health	(02) 4924 6477 (diverts to "Hunter New England Population Health"), select Option 4
NSW Fire and Rescue	Emergency Line 000 Gloucester Fire and Rescue NSW (02) 6541 9903
Safe Work NSW	Switchboard 13 10 50 , select Option 2 to report a notifiable event or Option 1 to report a death
MidCoast Council	Main Office (02) 7955 777 Active 9am – 4pm weekdays

The following information MUST be provided to the relevant authorities:

- Time ☐
- Date ☐
- Nature of Incident (i.e. spill of unknown chemical, dam release with unknown properties etc.) ☐
- Duration of Incident (i.e. how long ago did it occur if known) ☐
- Location of Incident (i.e. Metropolitan Coal Mine – underground, surface etc.) ☐
- Location where pollution is likely to occur (**IF KNOWN, DO NOT SPECULATE**) ☐
- Estimated quantity of any pollutants involved (**IF KNOWN, DO NOT SPECULATE**) ☐
- Concentration of any pollutants involved (**IF KNOWN, DO NOT SPECULATE**) ☐
- Actions being undertaken to control spill ☐



An audit of the effectiveness of the Pollution Incident Response Management Plan (PIRMP) must be undertaken annually with the outcomes of the audit logged on this document and reported in the PIRMP Performance Register. There are two types of audits that can be used for the review, a major incident mock scenario or an audit of personnel knowledge of the PIRMP. The person undertaking the audit will decide the most appropriate method of audit to be carried out.

Audit Scenario Type

- ## Major Incident Mock Scenario

[illegible]

Incident scenario:

Audit Review: Major Incident Mock Scenario

TEST	PASS (yes/no)	Comments
Did the personnel correctly identify the incident?		
Did the personnel assess the risks involved and clear the area if safe to do so?		
Did the personnel identify chemicals and check the SDS label for spill response (if applicable)?		
Did the personnel put in place any controls to prevent further spillage or losses?		
Did the personnel involved then notify the Control Room/Supervisor?		
Was the Pollution Incident Notification Form completed?		
Did the control room/supervisor immediately contact the person authorised to activate the PIRMP?		
Did the person notifying the authorities know who to contact and where this information is available?		
Did the person who was authorised to activate the PIRMP notify the person responsible for implementing the response?		
Was the response for activating the PIRMP done so in a timely manner?		
Was the response effective in containing any further pollution?		

Results of audit (include requirements for further training):

--

Personnel Knowledge Check Scenario

NAME OF PERSONNEL BEING TESTED:

POSITION:

Testing of the PIRMP:

QUESTION	Answer	PASS (yes/no)
Are you familiar with Pollution Incident Response Management Plan?		
What is the procedure to follow after a pollution incident has occurred?		
Who should you notify in the event of a pollution/ environmental incident?		
Who should you notify if the person above is unavailable?		
Where are copies of the PIRMP located?		
Do you know where Safety Data Sheets (SDS) are located?		
Where is the nearest spill control equipment located in your work area?		

Results (Office use only):

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AUTHORISED:

SIGNED:

DATE:

APPENDIX C

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN FLOW CHART

Stratford Coal – Pollution Incident Response Management Plan		
Revision No. R-013		
Document ID: Pollution Incident Response Management Plan		

Pollution Incident Response Flow Chart

Stratford Coal Mine



Person involved in incident to complete

OCE or Supervisor to complete

E&C Superintendent to complete

Pollution Incident Occurs

Assess Risks

- Make the area safe - prevent further harm
- Deliver 'First Aid' if persons are injured and ensure safety of people

Isolate Pollution/Spill Source and Contain

- Remove pollution or ignition sources - materials/objects, chemicals, flames, sparks, smoking etc
- If safe to do so, stop the pollution/spill and turn off equipment
- Prevent further pollution to waterways/land/air - use spill kits, absorbent material and earth mounds

Notify OCE/Shift Supervisor

- By two-way radio - **Channel 1 (CHPP), 2 (Open Cut)** or phone **Mick Bird 0429 633 657**
- State "Emergency Emergency Emergency"
- Follow instructions from OCE/Shift Supervisor and notify emergency services if required
- Complete **POLLUTION INCIDENT NOTIFICATION FORM**

Notify Person Authorised to Activate the PIRMP

- Environment and Community Superintendent - **Thomas Kirkwood 0437 174 781**

Notify Operations Manager

- Operations Manager - **John Cullen 0459 149 450**
- Complete **AUTHORITIES NOTIFICATION FORM**

Environment and Community Department Notify **EPA Pollution Line 131 555**

Major Pollution Incident Advice

- Confirm the incident response required with the EPA?
- Determine whether license exceedance/pollution incident requires further notification?
- Are the relevant authorities required to be notified?

YES

NO

Notify Relevant Authorities

- **NSW Minister for Health** (02) 4924 6477, ask for Public Health Officer
- **NSW Fire and Rescue** 000 (Emergency) or **Gloucester Fire Station** (02) 6558 1703
- **SafeWork NSW** 13 10 50 (Switchboard)
- **MidCoast Council** (02) 6538 5250

Implement Response

Follow Incident Response Procedure and advice from E&C Superintendent

Implement Response

- Follow instructions of authorities contacted and **Yancoal Emergency management Principal Control Plan** (refer Intalex) and **Incident Response Procedure**

APPENDIX D

PIRMP POTENTIAL POLLUTANT INVENTORY & MAXIMUM CHEMICAL STORAGE QUANTITIES

Stratford Coal – Pollution Incident Response Management Plan		
Revision No. R-013		
Document ID: Pollution Incident Response Management Plan		



STRATFORDCOAL

Part of the Yancoal Australia Group

Stratford Coal Mine

Pollution Incident Response Management Plan

POTENTIAL POLLUTANT INVENTORY & MAXIMUM CHEMICAL STORAGE QUANTITIES (>1000 L)

CHEMICAL	CAPACITY	LOCATION	STATUS
Sediment Laden Water	N/A	Sediment Dams and Dirty Water Drains	Storage in use – Potential for generation
Dust	N/A	Exposed areas	Potential for generation
Blast Fume	N/A	Active blasting areas	Potential for generation
Diesel	220,000 L	SCPL Workshop Fuel Farm	In use
Waste Oil	12,000 L	SCPL Workshop	In use
Engine Oil (15W40)	17,000 L	SCPL Workshop	In use
Transmission Fluid (TFC460)	10,000 L	SCPL Workshop	In use
Transmission Fluid (TFC430)	17,000 L	SCPL Workshop	In use
Coolant	6,500 L	SCPL Workshop	In use
Hydraulic Fluid (HN46)	6,500 L	SCPL Workshop	In use