SIMEC

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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Tahmoor Coal

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1 Background and Scope

The *Protection of the Environment Legislation Amendment Act 2011* was repealed and amended to the *Protection of the Environment Legislation Amendment Act 2014* (PELA Act) on 1 January 2015 resulting in changes to the *Protection of the Environment Operations Act 1997* (POEO Act). The key changes to the POEO Act are in regard to clarification of reporting and justice principles, however it also highlights the need to use GPS tracking when discarding of waste at licensed facilities.

The intent of the PELA Act is to improve the way pollution incidents are reported and managed. Provisions include a requirement for holders of Environment Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The specific requirements for PIRMP's are set out in Part 5.7A of the POEO Act and the *Protection of the Environment Operations (General) Regulation 2009* (POEO(G) Regulation). In summary, this legislation requires the following:

a) holders of an EPL must prepare a PIRMP (section 153A, POEO Act);

b) the plan must include the information detailed in the POEO Act (section 153C) and the POEO(G) Regulation (clause 98C) and be in the form required by the POEO(G) Regulation (clause 98B);

c) licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act);

d) licensees must test the plan at least every **12 months** and **after a pollution incident** in accordance with the POEO(G) Regulation (clause 98E); and

e) 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 1389, Tahmoor Coal Pty Ltd (Tahmoor Coal) is required to comply with the POEO Act, as such, this document has been developed to satisfy the PIRMP requirements documented above and **Table 1**.

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 is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act** (see **Section 6.1** of this document).

In May 2025 Tahmoor Coal received Development Consent SSD 8445-Mod-3 relating to 'Mod 3' of the Tahmoor South Project. Under the modification, Tahmoor Coal is authorised to extract an additional longwall panel (LW S7A) and increase the height of the existing reject emplacement area. This development consent is hereafter referred to as the 'Mod 3 Consent'.

2 Regulatory Requirements

Specific detail is required for inclusion in the PIRMP. **Table 1** lists information mandated under Section 153C of the POEO Act and clause 98C of the POEO(G) Regulation, and details where this information is located in this document.

Table 1 - POEO Act Requirements

Section 153C	Details Required	Location in document
(a)	The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to:	
	i. The owners or occupiers of premises in the vicinity of the premises to which the EPL relates,	Section 6.3
	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 6.2
	iii. Any persons or authorities required to be notified by Part 5.7 (of the POEO Act).	Section 6.2
(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 5.0
(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 6.2
(d)	Any other matter required by the Protection of the Environment Operations (General) Regulation 2009 (as set out below): 98C (1)(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity").	Section 3.2
	98C (1)(b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	Section 3.2
	98C (1)(c) 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.	Section 3.2
	98C (1)(d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity.	Section 3.3
	98C (1)(e) 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.	Section 3.3
	98C (1)(f) 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.	Section 5.0
	98C (1)(g)	Section 4.2

Section 153C	Details Required	Location in document
	The names, positions and 24-hour contact details of those key individuals who: a) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates, b) 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 c) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act).	Section 6.2
	98C (1)(h) The contact details of each relevant authority referred to in section 148 of the POEO Act.	Section 6.2
	98C (1)(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.	Section 6.3
	98C (1)(j) 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.	Section 5.0
	98C (1)(k) 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.	Appendices
	98C (1)(l) 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 that risk	Section 5.0
	98C (1)(m) The nature and objectives of any staff training program in relation to the plan.	Section 7.1
	98C (1)(n) The dates on which the plan has been tested and the name of the person who carried out the test.	Section 7.2
	98C (1)(o) The dates on which the plan is updated.	Section 7.2
	98C (1)(p) The manner in which the plan is to be tested and maintained.	Section 7.2

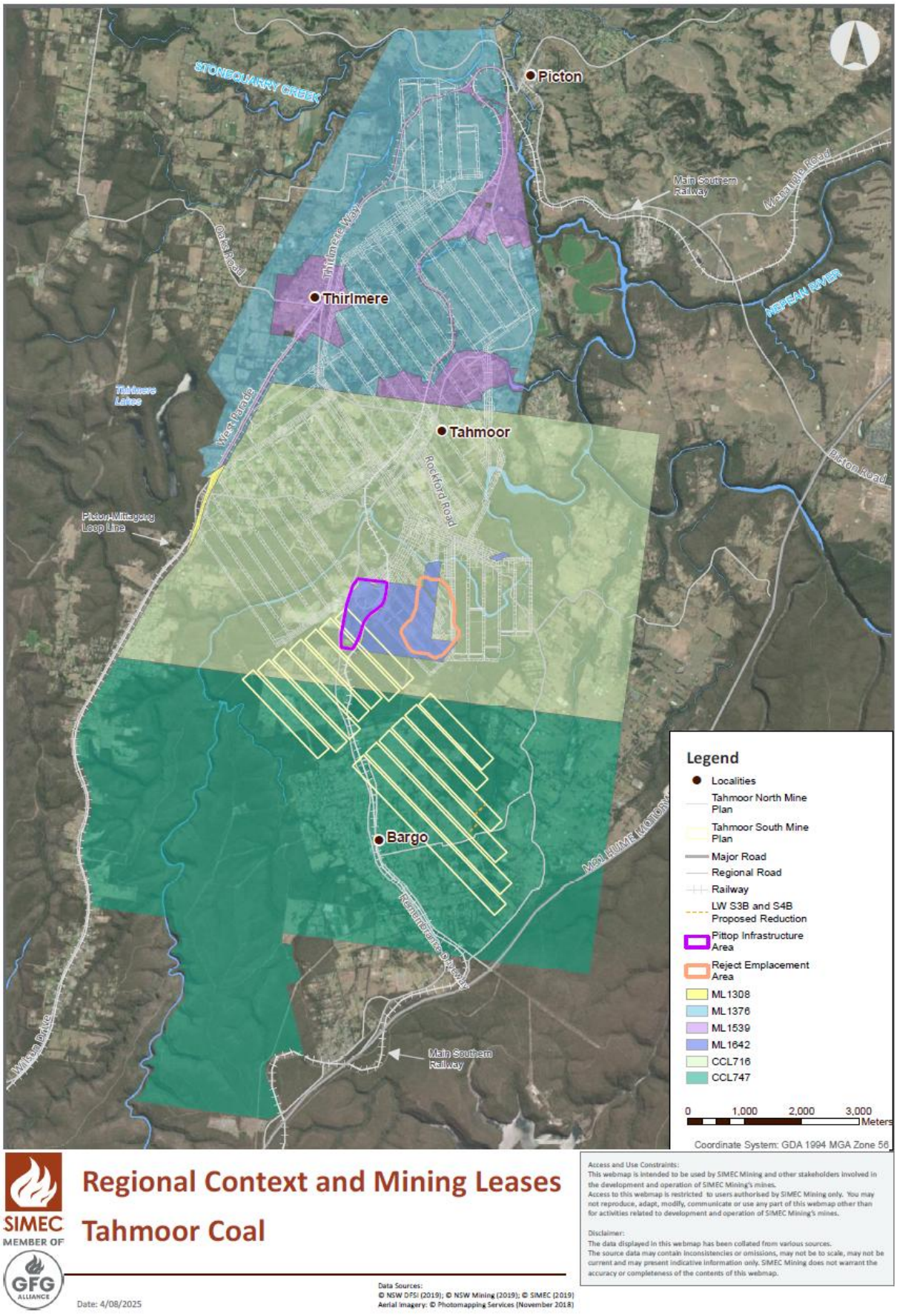


Figure 1 – Tahmoor Coal Mining Domains and Approved Boundaries

3 Premises Details

3.1 Site Details

Tahmoor Coal surface operations are located south of Tahmoor NSW, which is within the greater Sydney Basin - approximately 80 km southwest of Sydney. Tahmoor Mine is within the Wollondilly Shire Council (WSC) Local Government Area (LGA). (refer to **Appendix A**).

The surrounding area which may potentially be impacted by a pollution incident occurring at the Tahmoor Coal surface operations, may include the following:

- landholders adjacent to the mine (refer to **Appendix B**);
- a school approximately 360 metres east of the mine;
- a petrol station approximately 670 metres south east of the mine;
- downstream water courses (including inundation areas and adjacent landholders): Tea Tree Hollow and Bargo River; and
- nearby townships of Tahmoor, Bargo, Picton and Thirlmere (refer to **Figure 1**).

The mine site is predominately surrounded by bush and rural residential/farmlands. The site is enclosed by fencing, with a gap in the fencing at the north of the site to allow train access. The train rail loop is within the premises and connects to the Main Southern Railway Line corridor.

3.2 Major Hazards

The potential major hazards which have been identified for Tahmoor Coal include:

- spills (e.g. hydrocarbon, hazardous chemicals, etc) resulting in localised land contamination on the premises;
- spills (e.g. hydrocarbon, hazardous chemicals, saline or sediment laden water, etc) resulting in water contamination;
- major water discharge (e.g. via flooding or dam failure – refer to **Appendix D**); and
- fire.

The likelihood of environmental hazards occurring at the Tahmoor Coal has been captured through the Tahmoor Coal Environment and Community Broad Brush Risk Assessment (E&C BBRA), undertaken to align with *TAH-HSEC-00115 Aspects & Impacts (E&C BBRA) Procedure.* The purpose of the E&C 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. Once all identified aspects, impacts, risks and management controls have been identified, they are detailed in the E&C BBRA, and corrective actions assigned to individuals for completion as required.

Tahmoor Coal implements site specific risk management plans, including:

- TAH-HSEC-00133 Fire and Explosion Principal Hazard Management Plan.

The systematic identification, assessment and management of foreseeable catastrophic (core) hazards is undertaken, with the process including:

- identifying foreseeable hazards associated with operations at Tahmoor Coal;
- assessing Sustainable Development risks using recognised analysis and evaluation methodologies; and
- Implementing controls necessary to eliminate or reduce identified catastrophic (core) risks in accordance with the established hierarchy of controls for environmental management.

3.3 Chemical and Potential Pollutants

All chemicals at Tahmoor Coal are included on the ChemAlert Register, an online database accessed by personnel on the mine site. The Dangerous Goods Emergency Manifest is held in the Control Room (telephone: (02) 4640 0111) and located in a red box (HAZMAT box) at the entry of the premises at the main entry **Gate 1.** The main chemicals and potential pollutants held at Tahmoor Coal include:

- Explosives;
- Flammable gas;
- Flammable liquids;
- Diesel;
- Fire resistant hydraulic fluid;
- Corrosive substances; and
- Toxic substances.

All chemicals are accompanied by the relevant Material Safety Data Sheets as required by work health and safety regulations.

The maximum quantity of explosives stored on the premises is detailed in Tahmoor Coals Licence to Store Explosives (No. XSTR200005).

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
- have floors graded to a collection sump.

Explosives for underground operations are stored in licensed explosive magazines in accordance with Workcover requirements. The Dangerous Goods Licence covers the storage of these materials.

Potential pollutants created as part of mining operations, and thus excluded from the ChemAlert register, include:

- mine tailings within the Coal Handling Preparation Plant;
- mine water (extracted from underground workings);
- sediment laden surface water runoff from disturbed areas; and
- effluent waste from the sewage treatment plant.

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 E&C BBRA Risk Register as discussed above.

Appendix C displays the location of potential pollutants including tailings dams, underground tanks and fuel storage locations.

3.4 Meteorological and Seasonal Risks

Weather conditions can cause a number of additional risks associated with incident and pollution mitigation. Understanding seasonal weather patterns and trends is critical to implementing the correct mitigation controls to reduce the likelihood and severity of fire and flood events.

3.4.1 Flooding – La Nina (cool/wet weather phenomenon)

Before and during wet weather events it is essential to ensure the following is implemented:

- All sediment and erosion controls for unsealed or areas under construction/development are in good working order;
- Continually treat and remove stormwater from retention basins and dams according to licence conditions to maintain capacity;
- Keep bunds empty and take all measures to prevent them being filled with stormwater;
- Keep chemicals stored above areas that are prone to inundation; and
- Secure all loose items to prevent them coming into contact with floodwater.

3.4.2 Fire and Dust – El Nino (warm/dry weather phenomenon)

Before and during warm dry weather events it is essential to ensure the following is implemented:

- Ensure potential fuels for fire are management and reduced/removed as needed (chemical storage, waste storage, vegetation);
- Ensure dust suppression is utilised for internal roads and stockpiles;
- Ensure firefighting equipment is tested, tagged and in date; and
- Restrict activities which can be an ignition source (e.g. Hot works) during days of heightened risk (i.e. Total Fire Bans etc).

4 Management and Responsibilities

4.1 Legal Duty to Notify

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

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:

a) the duty of an employee or any person undertaking an activity:

- Any person engaged as an employee or undertaking an activity (at Tahmoor Coal) 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**; and

b) the duty of the employer or occupier of a premises to notify:

- An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake notification to the appropriate regulatory authority of any “material harm incidents”, including relevant information. Notification shall be undertaken by the Environment and Community Manager or General Manager as per **Section 5**.

4.2 PIRMP Management

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

Table 2 - PIRMP Responsibilities

Name	Contact Details	Position	Responsibility
Peter Vale	(02) 46 400 111	Executive General Manager – Coal Operations	The determination of a material harm incident will be made by the General Manager in consultation with the Environment and Community Manager. Authorised to liaise with the relevant authority.
Amanda Bateman	(02) 46400 025	Environment and Community Manager	Responsible for authorising the PIRMP and all subsequent updates. Responsible for ensuring adequate resourcing for implementation of the PIRMP. Authorised to liaise with the relevant authority. Responsible for undertaking notification as defined in this PIRMP. Responsible for managing the response to a pollution incident. Responsible for coordinating communications with affected community members.
Natalie Brumby	0447 213 676	Environment Specialist	Responsible for undertaking notification as defined in this PIRMP. Responsible for coordinating the response to a pollution incident. Facilitate site personnel in implementation of the PIRMP. Communication of the PIRMP to site personnel. Responsible for arranging testing and updating of the PIRMP. Responsible for ensuring notification and training of PIRMP.

5 Incident Management

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

In the case of an environmental incident, prior to any other action, the site must contact triple zero '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 (triple zero '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:

a) provide for the safety of people at and within the vicinity of the site; and

b) contain the pollution incident.

The actions to be implemented at Tahmoor Coal on the occasion of an incident include the following:

a) Secure the scene and contain the incident;

b) Gather information (i.e. environmental monitoring);

c) Determine the investigation level;

d) Commence an ICAM (if required);

e) Review and classify information and determine actions;

f) Complete actions; and

g) Trend analysis reports.

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

- TAH-HSEC-235 Emergency and Incident Control Plan;
- TAH-HSEC-00133 Fire and Explosion Principal Hazard Management Plan; and
- TAH-HSEC-00139 Incident and Hazard Management Plan.

Each management plan documents the roles and accountabilities of key personnel at each operation in the event of an emergency and the contact details for appropriate emergency services. The plans also provide designated evacuation points and procedures in the event of an emergency. Any changes to emergency procedures are documented and communicated to all personnel.

Emergencies, Crises and Business Continuity.

Incident management at Tahmoor Coal focuses on actions to:

a) secure and assign necessary tactical response resources, including equipment and/or personnel, to minimise the environmental impacts associated with the incident;

b) establish that tactical response operations are carried out in a safe, well-organised, legal and effective fashion;

c) provide for the safety and welfare of all responders, employees, contractors and visitors;

d) continuously assess the incident to determine the adequacy of tactical response operations and the need for assistance from the SIMEC Corporate Team;

e) manage stakeholders arriving at site;

f) minimise effects on people, the environment, property, production, and company reputation;

g) 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

h) interact, as appropriate, with SIMEC GFG personnel.

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

TAH-HSEC-00154 Pipeline Management:

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

TAH- HSEC-00369 Water Management Plan and the TAH-HSEC-00033 Surface Water TARP:

- major water discharge (for example dam failure);

TAH-HSEC-00133 Fire and Explosion Principal Hazard Management Plan:

- fire (for example spontaneous combustion fires associated with coal stockpiles);
- general emergency procedures;
- firefighting provisions;
- emergency provisions; and
- emergency escape system.

TAH-HSEC-235 Emergency and Incident Control Plan:

- events & communication logs;
- controlling access to site, including log of traffic;
- role accountabilities;
- evacuation from underground and/or surface buildings;
- specific emergency situations, as identified in risk assessments;
- critical incident stress management process; and
- debrief process after any emergency situation.

All Tahmoor Coal employees and contractors receive emergency preparedness and response training during their site familiarisation induction and refresher inductions every three (3) years. Tahmoor Coal maintains a dedicated emergency response team who undergo regular training and operational drills. Controls of personal protective equipment and incident containment and control equipment are detailed in the risk assessment documents listed in **Section 3.2**, this includes but is not necessarily limited to:

- emergency spill kits;
- portable pumping infrastructure;
- earth moving plant;
- floating booms and silt curtains; and
- erosion and sediment control materials.

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

6 Notification Procedures

6.1 Determination of Material Harm

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

a) involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or

b) results in actual or potential loss (including all reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment) or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations).

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

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

6.2 Internal and External Notification

As discussed in **Section 4.1**, 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 **Appendix G**.

The agencies must be contacted in the order outlined in **Table 3** below.

In the instance of identification of an environmental incident or hazard, the personnel will report the issue immediately to their **Supervisor** or the **Control Room** (**111** or **46400111** for external phone lines), who in turn shall report it to the Environment and Community Manager, or any member of the environmental team. Immediately is taken to mean 'promptly and without delay'. As per guidance provided by the EPA, the decision on whether to notify the incident in accordance with Part 5.7 of the POEO Act should not delay immediate actions to provide the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe to do so.

Table 3 - External Agency Notification

Agency	Contact Details
Fire and Rescue	000 (To be contacted first if fire or rescue services are required, otherwise contact last)
EPA	131 555
DPHI	(02) 4247 1800 (Wollongong Office)
NSW Ministry of Health	(02) 4924 6477 (ask for Public Health Officer on call)
SafeWork NSW	131 050
Wollondilly Shire Council	(02) 4677 1100 (office and after hours)
Resources Regulator	(02) 4063 6860 or 1300 814 609 if no answer

In addition to being detailed in this document, procedures for undertaking internal and external notification are included in the following Tahmoor Coal documents:

a) TAH-HSEC-00375 Tahmoor South - Environmental Management Strategy Management Plan (in Section 3.14.1); and

b) TAH-HSEC-00224 Notification of Environmental Pollution Incidents.

Record keeping of incident details, including investigations and outcomes, will be undertaken in accordance with *TAH-HSEC-00124 Document and Record Control Procedure*.

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

The EPA 'Frequently Asked Questions' webpage can be referenced for clarity in the event of an incident:

[1] EPA, *Frequently Asked Questions Regarding the Duty to Notify of a Pollution Incident* (March 2012) < 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

6.3 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 included in the Tahmoor Coal Stakeholder Register. The following notification methodology is proposed to be utilised as required:

a) early warnings - same day telephone notification to landholders whom may be affected by the incident over the subsequent 24-hour period; and

b) updates - follow up phone calls to all landholders whom 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, Tahmoor Coal website, media statements or any other strategy as defined in the *TAH-HSEC-00039 Stakeholder Engagement Plan*.

Priority will be granted to notification of sensitive premises in close proximity such as the local school.

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

a) type of incident that has occurred;

b) potential impacts local landholders and the community;

c) site contact details; and

d) advice or recommendations based on the incident type and scale.

7 Training, Testing and Communication

7.1 Training

All personnel affected by the content of this document will receive instruction or explanation on the relevant parts of the document as per:

- TAH-HSEC-00022 Tahmoor Training and Competency Management Plan.

Incident management and emergency response shall be included in all Tahmoor Coal site inductions.

A training exercise designed to test the adequacy of emergency preparedness and response will be undertaken at least once each year. Training exercises may involve the emergency response team responding to a simulated emergency, but may also include expanded simulations that involve other (or all) site personnel, the Emergency Management Team, Incident Management Team and external response agencies (Ambulance, Fire, Mines Rescue etc).

All training records, including the name of the person undertaking training and date of training, shall be maintained in compliance with:

- TAH-HSEC-00124 Document and Record Control Procedure.

7.2 Testing, Review & Maintenance

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

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

Records will be kept in accordance with:

- TAH-HSEC-00124 Document and Record Control Procedure.

and will be included in **Section 12** (Change Notification) of this plan. Information to be retained regarding PIRMP testing includes:

a) the manner in which the test was undertaken;
b) dates when the plan has been tested;
c) the person who carried out the testing; and
d) the date and description of any update of or amendment to the plan.

7.3 Availability of the PIRMP

The PIRMP shall be kept in written form at Tahmoor Coal 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 via the Tahmoor Coal 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.

8 Definitions

Table 4 – Definitions if terms included in this PIRMP

Term	Meaning
ChemAlert	Tahmoor Coal's chemical safety management system.
DPHI	Department of Planning, Housing and Infrastructure
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	The Protection of the Environment Operations Act 1997, the key piece of environment protection legislation administered by the EPA
Pollution Incident	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
Material Harm	Refer to section 6.1 of this document
Relevant Authority	Any of the authorities relevant to the pollution incident notification requirements as outlined in section 148(8) of the POEO Act 1997

9 Accountabilities

E&C management is regarded as part of the responsibilities of all employees and contractors at Tahmoor Coal. Specific information pertaining to the role, responsibility, authority and accountability of key personnel involved in environmental management at Tahmoor Coal is provided in **Table 5**.

Table 5 - Tahmoor Coal accountabilities for carrying out this PIRMP

Role	Accountabilities for this document
General Manager	Provide adequate environmental personnel/resources for implementation of this plan and associated plans.
Environment and Community Manager	Facilitate a process of managing overall compliance with regulatory requirements and undertake external reporting for legislative non-compliances as required. Determine adequate resources and funds are available to ensure the effectiveness of this procedure; and certify compliance and adherence to the EMS. Develop, implement and maintain the EMS. Liaise with relevant government authorities in relation to regulatory conditions and compliance issue.

Role	Accountabilities for this document
	Liaise with the community as required and as per the Stakeholder Engagement Strategy, including facilitation of Community Consultative Committee meetings.
All Managers	Activities under their control are to be undertaken in accordance with this EMS and associated management plans and site procedures. Manage environmental controls within their jurisdiction are operated and maintained in a proper and efficient manner. Report all environmental incidents and complaints in a timely manner
Environmental Specialist	Responsible for coordinating environmental compliance on-site including timely completion of monitoring and reporting in accordance with internal and external requirements. Sign off on the accuracy of reports and the suitability of recommendations. Develop, implement, review and maintain the EMS and system documents. Implement process for self-assessment audits. Assign persons responsible for completion of audit actions and set a due by date. Monitor that planned actions arising out of audits are implemented. Ensure all community complaints are addressed, investigated and appropriately managed as per site procedures, and reported internally as per internal requirements
All Coordinators/Specialists	Activities under their control are to be undertaken in accordance with this EMS and associated management plans and site procedures. Manage environmental controls within their jurisdiction are operated and maintained in a proper and efficient manner. Report all environmental incidents and complaints in a timely manner.
All persons	Activities under their control are to be undertaken in accordance with this EMS and associated management plans and site procedures. Manage environmental controls within their jurisdiction are operated and maintained in a proper and efficient manner. Report all environmental incidents and complaints in a timely manner

10 Review and Improvement

10.1 Audit

Audits of the ***Pollution Incident Response Plan*** shall be conducted in consultation with the Plan owner and nominated individuals and shall focus on the content and implementation.

Audits on the content shall consist of a determination of understanding of the ***Pollution Incident Response Plan*** by the individual's allocated responsibility under this plan.

Audits on the implementation shall consist of reviews of the safe working procedures and risk assessments developed to ensure safe operation of the ***Pollution Incident Response Plan***, they may also involve discussions with personnel involved in the management plan to determine understanding and compliance.

Should an audit of the Pollution Incident Response Plan determine that a deficiency is evident in the content or implementation; a corrective action must be developed and implemented. Actions will be assigned to a nominated individual and tracked in Tahmoor Coal's compliance management system.

The ***Environmental Specialist*** is responsible to verify that the nominated corrective action has been implemented by way of a follow up audit.

Any changes ***Pollution Incident Response Plan*** are to be managed and communicated to all personnel in line with the Change Management Process.

10.2 Review

This ***Pollution Incident Response Plan*** will be reviewed:

Event based: a review will be triggered following any event or finding that identifies an inadequacy in the ***Pollution Incident Response Plan***, risk assessment or associated documents to continue to effectively manage the identified hazard; a change to the workplace itself or any aspect of the work environment, a change to a system of work, a process or a procedure; or

Time based: in the absence of regular event-based reviews, a ***yearly*** review will be conducted to determine that there are not changes to the hazards and issued being managed in the ***Pollution Incident Response Plan*** and that they system and procedures detailed in the ***Pollution Incident Response Plan*** are being complied with.

If deemed appropriate, external service providers may be included in the review process. All reviews are to be documented.

11 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.

11.1 Related Document

Related documents, listed in **Table 6**, are internal documents directly related to or referenced from this document.

Table 6 - Internal documents relating to this PIRMP.

Number	Title
TAH-HSEC-00224	Notification of Environmental Pollution Incidents.
TAH-HSEC-00022	Training and Competency Plan.
TAH-HSEC-00235	Emergency and Incident Control Plan
TAH-HSEC-00133	Fire and Explosion Principal Hazard Management Plan
TAH-HSEC-00139	Incident and Hazard Management Plan
TAH-HSEC-00115	Aspects & Impacts (E&C BBRA) Procedure
TAH-HSEC-00154	Pipeline Management
TAH-HSEC-00375	Tahmoor South Environmental Management Strategy Management Plan
TAH-HSEC-00124	Document Control Procedure.
TAH-HSEC-00369	Water Management Plan and TARP.
	Dangerous Goods Emergency Manifest (ChemAlert).
	Stakeholder Register (Consult Manager)
TAH-HSEC-00001	License to store explosives

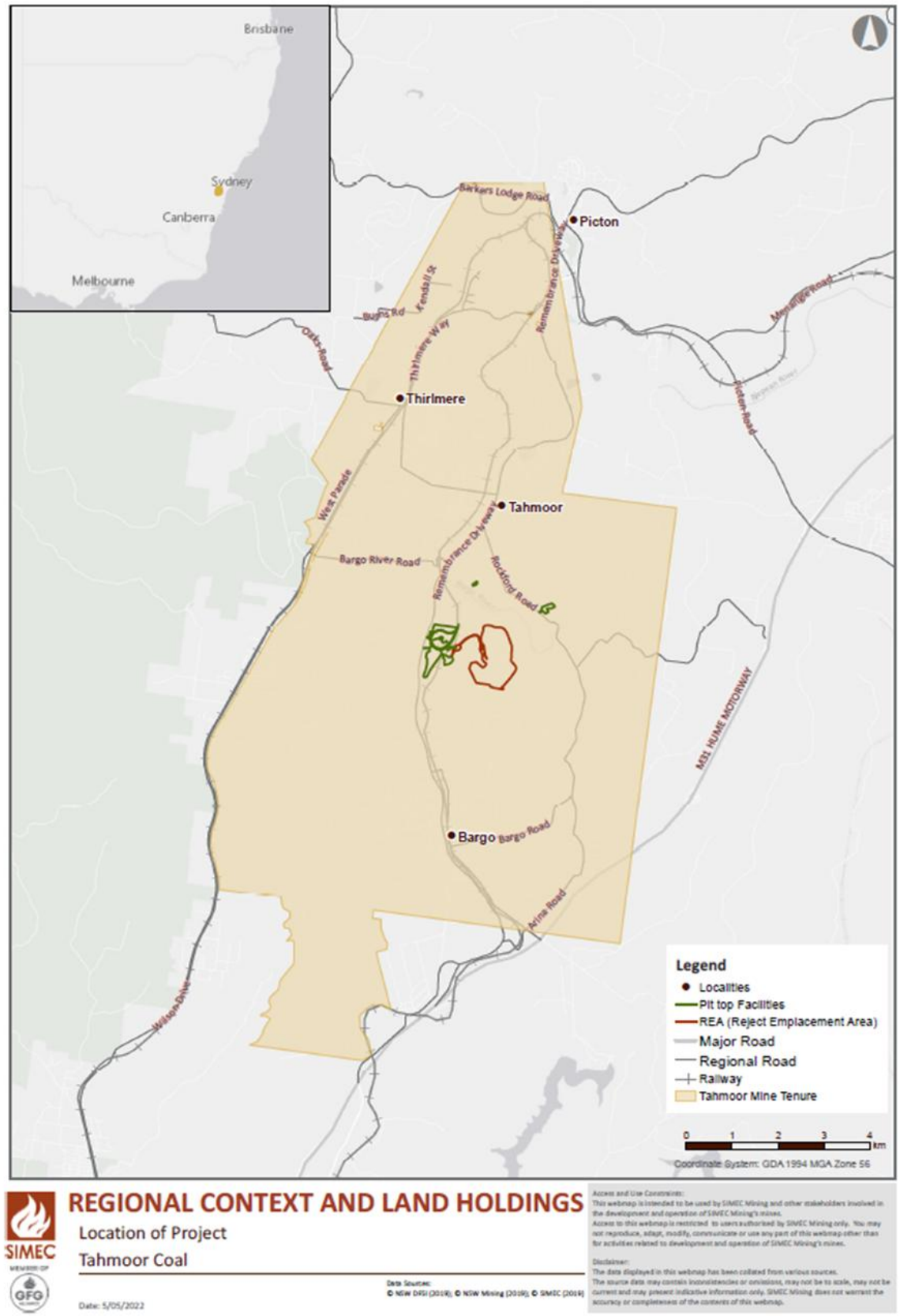
12 Change Information

12.1 Change Information

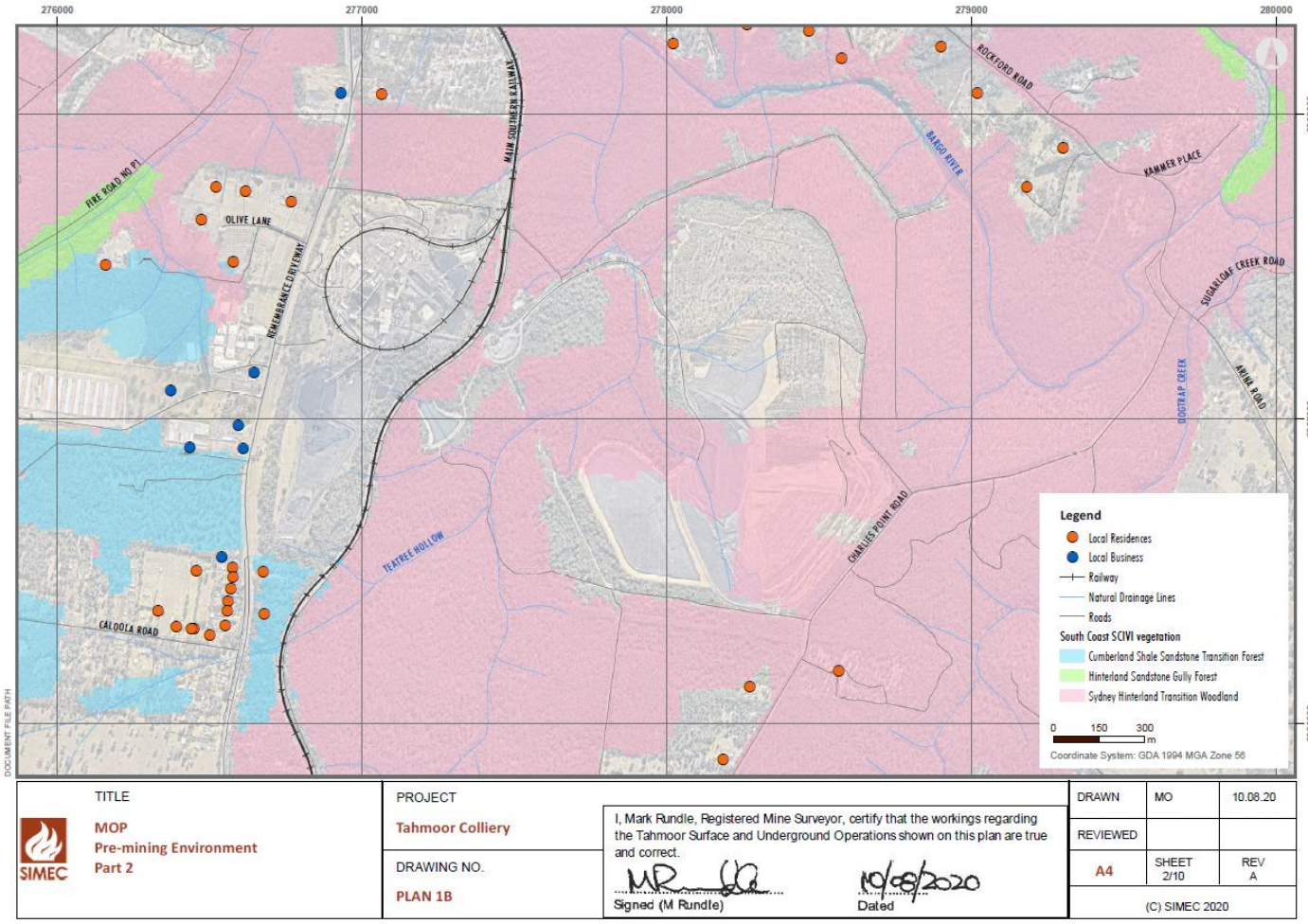
Table 7 - Document change information

Version	Date Reviewed	Review team (Consultation)	Change Summary
12.0	11th February 2020	Abby Uljanic	Document updated to new template. No change to document content.
14.0	11th May 2020	Fiona Robinson	Testing after incident. 2020 assessment.
15.0	2nd September 2020	Alex Parro, April Hudson	General review, remove Glencore references and standards.
16.0	22nd January 2021	Natalie Brumby, April Hudson	Reviewed in accordance with Condition 46 of DA67-98 (2020) following submission of the 2020 Independent Environmental Audit to DPIE. Updated Appendix E and Appendix G.
17.0	30th April 2021	Tom O'Brien, Natalie Brumby	Table 2 updated – Environmental Specialist contact details added Table 3 updated – DPIE contact details added Table 4 updated – DPIE definition added Implementation of NC REC 5 from the 2020 Independent Environmental Audit.
18.0	16th June 2021 26th November 2021	Tom O'Brien, Natalie Brumby	Review and added Section 3.4 Updated Figure 1, Appendix B,C and D. Removed Figure 2. Note: Test was conducted on 16 June 2021 following Foaming detected in Pit-top dam -initiated from hose disconnection from a bathhouse bodywash IBC. Internal notification process implemented successfully, and foam contained on site)
19.0	7th April 2022	Tom O'Brien, Natalie Brumby	Review following <20L Body wash spill in yard. Contained and PIRMP notification process successfully implemented.
20.0	19th August 2022	Tom O'Brien, Natalie Brumby	Review following foam found in dam. Contained and PIRMP notification process successfully implemented. Appendix A updated.
21.0	30th June 2023	Tom O'Brien, Natalie Brumby	Reviewed and tested on 30th June 2023. Internal notification process explained successfully from Control.
22.0	21st June 2024	Tom O'Brien, Natalie Brumby	Reviewed following test conducted on the 24th of May 2024. DPHI references amended following change of Department name.
23.0	3rd September 2025	Tom O'Brien	Review in accordance with Condition E7(d) following the approval of Modification 3 (on 26 May 2025) and Condition E7(b) following the submission of an annual review (on 30 September 2025).
24.0	9th April 2026	Natalie Brumby	Reviewed and contact information in Table 1 updated following Care and Maintenance Risk Assessment. Appendix C and D maps updated.

Appendix A – Tahmoor Coal site location and Land Holdings

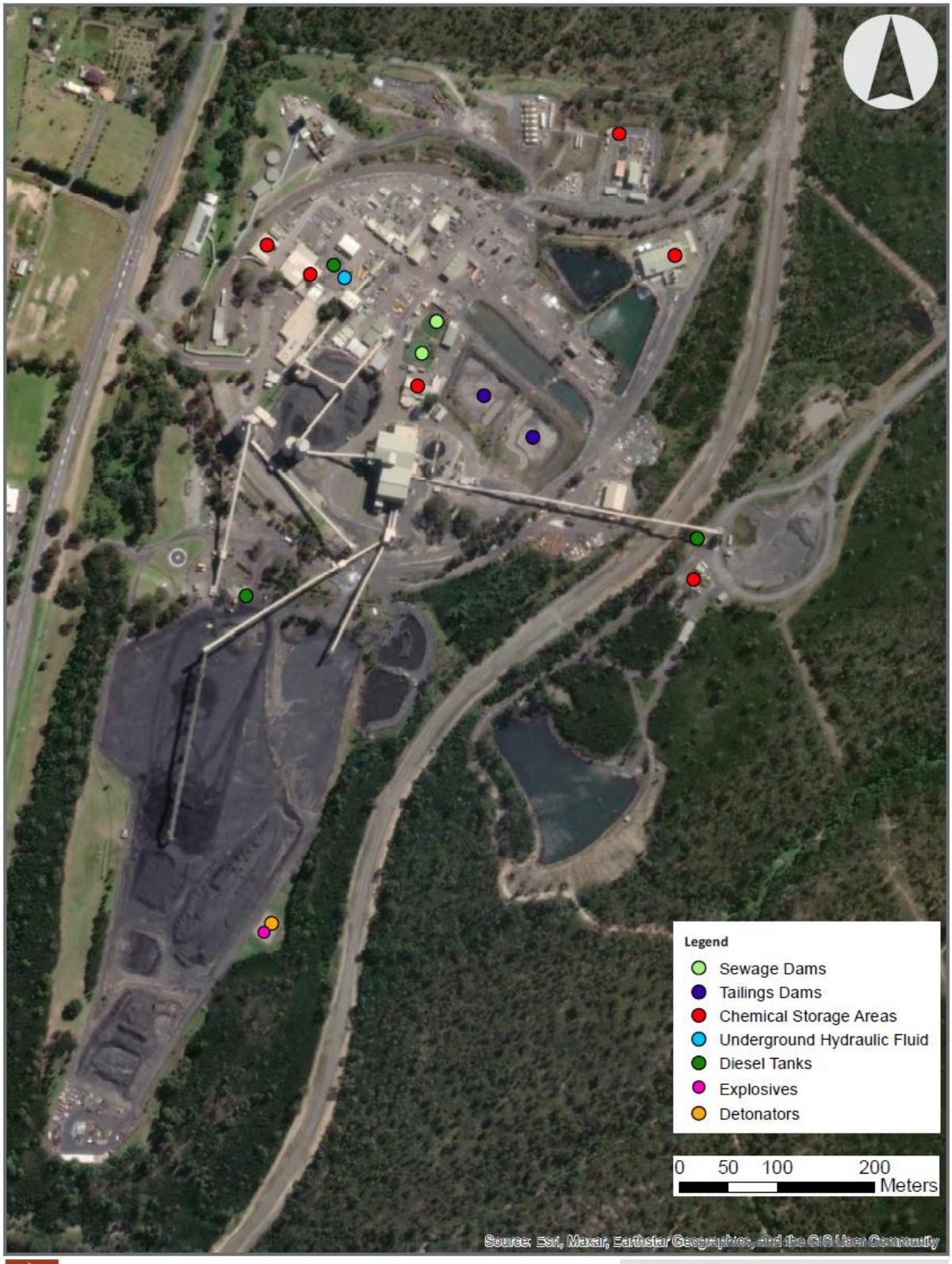


Appendix B - Neighbouring properties potentially impacted by a pollution incident



Uncontrolled when printed

Appendix C – Location of Potential Pollutants



Appendix D – Water Pathways – Pathways

SIMEC MEMBER OF GFG ALLIANCE

Tahmoor Coal
Dams, Drainage Lines and Monitoring Points

Date: 9/04/2026

Data Sources:
© NSW DFSI (2019)
© NSW Mining (2019)
© SIMEC (2019)

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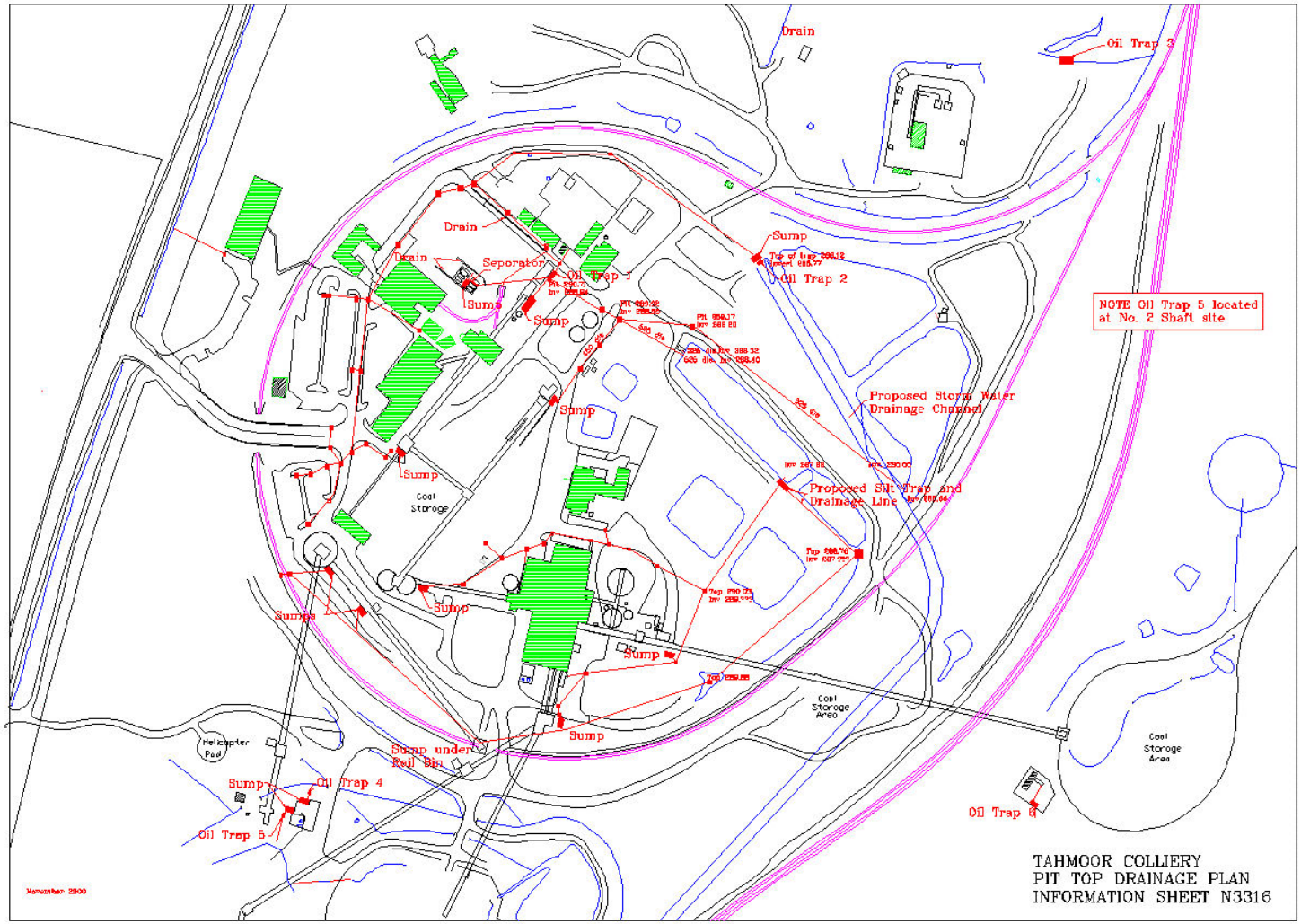
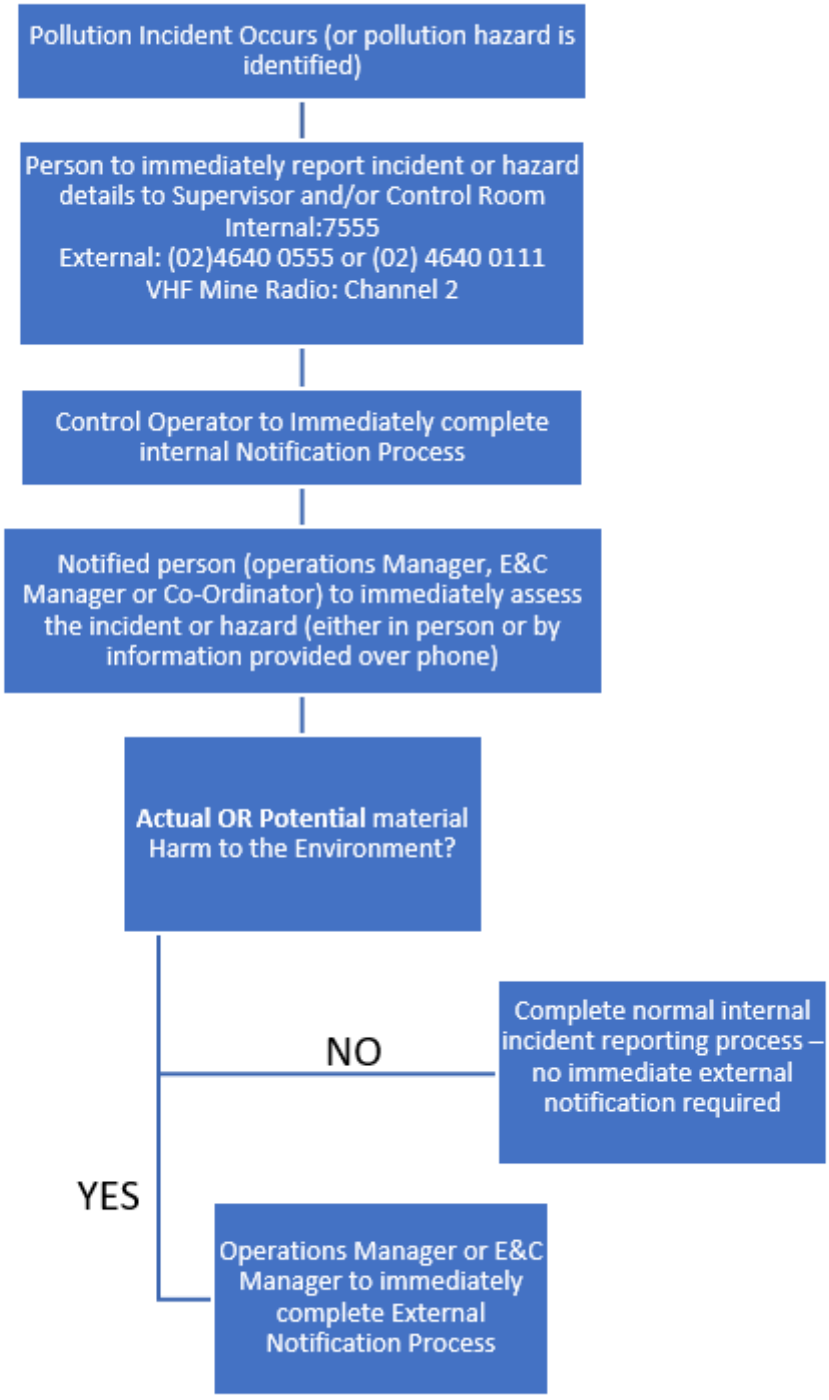
The source data may contain inconsistencies or omissions, may not be to scale, may not be current and may present indicative information only. SIMEC Mining does not warrant the accuracy or completeness of the contents of this webmap.

Appendix E – Water Pathways – Drains



Appendix F – Notification Flow Chart