



STRATFORD COAL MINE Pollution Incident Response Management Plan

STRATFORD COAL MINE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



Revision Status Register

Section/Page/ Annexure	Revision Number	Amendment/Addition	Author	Distribution	Date
All	12-787-R-002	Original	SCPL	EPA	28/08/2012
All	12-787-R-003	Revision following Annual Audit	SCPL	EPA	13/01/2014
All	12-787-R-004	Revision following Annual PIRMP Audit 2015	SCPL	EPA	November 2014
All	12-787-R-005	Revision following Annual PIRMP Audit 2015	SCPL	EPA	November 2015
All	12-787-R-006	Revision following Annual PIRMP Audit 2017	SCPL	EPA	August 2017

August 2017

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1 INTRODUCTION

Yancoal Australia Limited (YAL) is an Australian coal producer with exploration and mining operations in NSW, Queensland and WA. YAL operate two open cut mines, Stratford and Duralie in the Gloucester Basin in NSW.

Stratford Coal Pty Ltd (SCPL), a wholly owned subsidiary of Yancoal Australia Limited, operates the Stratford Coal Mine. SCPL is located in the Gloucester Valley approximately 1.5 kilometres east of Stratford village and 2 kilometres north of Craven village, New South Wales (NSW). The Stratford Coal Mine (SCM) has been in continuous operation since 1995 and has involved open cut mining and processing of coal from the Main pit and several smaller satellite pits (Bowens Road West, Roseville, Roseville Extension, Roseville West and Bowens Road North pits), within the Stratford mine leases at the Stratford Coal Handling and Preparation Plant (CHPP).

SCPL was granted Development Consent for the Stratford Open Cut Coal Project (the Project) under Section 75J of the New South Wales (NSW) *Environmental Planning and Assessment Act 1979* (EP&A Act) on 21 December 1994 (the Development Consent).

The Project comprises continuation, upgrade and extension of open cut coal mining operations. The Approved open cut mining Project layout with areas of potential impact is shown in **Figure 1**.

1.1 PURPOSE AND SCOPE

The Pollution Incident Response Management Plan (**PIRMP**) has been prepared by SCPL. SCPL hold two Environment Protection Licences (**EPL**), EPL 5161 for the Stratford Coal Mine and EPL 11745 for the Bowens Road North Coal Project, 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 2009*(**Regulation**). The EPLs cover the following scheduled activities:

1. EPL 5161 - Coal Works and Mining for Coal (Stratford)
2. EPL 11745 – Coal Works and Mining for Coal (Bowens Road North)

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

- a system designed to manage any possible pollution incidents to which EPL 5161 / 11745 relate;
- 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 relationship of this PIRMP to the Stratford Environmental Management Structure is shown on **Figure 2**.

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1.2 DEFINITION OF A POLLUTION INCIDENT

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.

1.3 REPORTING AN INCIDENT

SCPL will report any exceedances of its EPLs 5161 / 11745 in accordance with Part 5.7 of the POEO Act and relevant conditions of EPLs 5161 / 11745. Pollution incidents that are considered to cause or have the potential to cause material harm to the environment (see definition in **Section 3**) or be within the range of the defined threshold for material harm will be reported to the relevant authorities in the PIRMP flowchart (available **Appendix C** and **Section 4**). Any licence exceedances are to be reported immediately to the relevant authority as described in **Section 7.1** and the other listed agencies where required. Information relating to the pollution incident that is unknown in the first notification instance, and later becomes known, must be given to the relevant authority immediately.

1.4 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 notification process of the PIRMP.
- Section 5: Describes how Stratford Mine 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 review and improvement of environmental performance.
- Section 13: Provides a Contingency Plan to manage any unpredicted impacts and their consequences.
- Section 14: Outlines the management and reporting 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 / 11745 relates and implemented in the case of an incident. In accordance with Clause 98E of the Regulation it 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 review 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 / 11745 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. Permanent Mining Contractors on site will also be provided a copy of 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 to:

- **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;
- **Permanent Mining Contractors** – hardcopy or on the 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 and EPL 11745;
- i) the conditions of the 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 / 11745 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 PIRMP (section 153F, POEO Act).

Please note in accordance with the *POEO Act, Section 147* the meaning of ‘*material harm to the environment*’ is:

(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.’

Section 148of the POEO Act, requires that a person carrying on the activity must, immediately after the person becomes aware of the incident; 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 7
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>	Risk Assessment in Appendix A
Likelihood of hazards occurring - <i>POEO Act Section 153C (d)</i>	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 Section 98C(1)(c)</i>	Risk Assessment in Appendix A
Inventory of potential pollutants - <i>POEO Act Section 153C (d) and POEO Reg 98C(1)(d) and (e)</i>	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>	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 2
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 Stratford Coal Mine 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	Date of Issue	Date of Expiration	Comments
Mining Leases Stratford: No. 1360 No. 1409 No. 1447 No. 1521 No. 1538 No. 1528 No. 1577	21/12/1994 07/01/1997 01/04/1999 24/09/2002 25/06/2003 20/01/2003 01/03/2006	21/12/15 07/01/2018 01/04/2020 24/09/2023 25/06/2024 20/01/2024 01/03/2027	<ul style="list-style-type: none"> Copies of the mining leases are available for review at the Stratford Coal office or at www.stratfordcoal.com.au.
Mining Operations Plans (MOPs)	November 2016	31/12/2018	<ul style="list-style-type: none"> The Stratford MOP has been revised and updated on several occasions. Most recently on 31/8/2017.
Development Consent Stratford (incl. Roseville) DA 23-98/99 Bowens Road North DA39-02-01	19/12/1994 25/7/2001	31/12/2019 31/12/2014	<ul style="list-style-type: none"> A copy of the Development Consent is available for review at the Stratford Coal office or at www.stratfordcoal.com.au. Since approval of the Stratford Coal Mine in December 1994 and commencement of operations at the Stratford Mine Project in 1995, a number of Modifications to Consent have occurred.
Environment Protection Licences EPL 5161 EPL 11745	09/01/2001 16/12/2002	Valid until suspension	<ul style="list-style-type: none"> The EPL's have had a number of Variations issued since their initial granting Latest Annual Return submitted to the Environment Protection Authority.
Bore Licences: 20BL169101 20BL169102 20BL169103 20BL169104 20BL169400 20BL167932 20BL167416 Piezometer network MW1 to MW9 (20BL168399)		28/09/2014 28/09/2014 13/06/2015 28/09/2014 31/07/2017 Perpetuity Perpetuity Perpetuity Perpetuity	<ul style="list-style-type: none"> Issued to cover groundwater extraction as a result of the active mining area. Monitoring bore network
Surface water licences: 20SL022591 20AL204410 20AL204396		Perpetuity Perpetuity 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 if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened SCPL must notify the relevant authorities. As part of the Stratford Coal Mine Site Induction, all personnel and contractors will be trained in PIRMP responsibilities and emergency procedures for an incident response. Following an environmental incident the Environment and Community Superintendent must be contacted immediately to determine the risk to the environment (see Flowchart in **Appendix C**). Pollution incidents (as defined in **Section 3**) must be reported immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover 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 be given to the relevant authority immediately.

Licence exceedences that are reportable but are not considered to cause material harm (as described in **Section 3**) are to be reported to the relevant authority as described in **Section 7.1** and also to other agencies as assessed

Condition R2.2 of EPL5161 / 11745 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.

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:

- Notification in conjunction with emergency services.
- Notification via Stratford Coal Website (www.stratfordcoal.com.au)
- Personnel will notify specific residences that have the potential to be impacted by a pollution incident.

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 Yancoal Emergency Management Plan 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 Yancoal Emergency Management Plan 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 3**) is caused or threatened, the person carrying out the activity must immediately implement this 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 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.

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7 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 PIMRP using the Authorities Notification Form in **Appendix B**.

Further, in accordance with *Section 153C of the POEO Act 1997*, the action to be taken immediately after a pollution incident 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.

7.1 STATUTORY NON-COMPLIANCES & MINOR INCIDENTS

If the environmental incident has exceeded a licence condition and is unlikely to pose a threat to the environment that constitutes the definition as described in **Section 3** of this PIRMP, the relevant authority must be notified in accordance with the EPL and further notification to other agencies as required.

In the event that the incident is deemed by the Environmental and Community Superintendent to be unlikely to pose a threat to the environment that constitutes the definition as described in **Section 3** of this PIRMP and is not a licence exceedance, then the following steps are to be undertaken.

1. Assess best clean up procedures for each incident based on product type and site issues in coordination with the Operations Manager or relevant supervisor.
2. Remove contaminated soil, wastewater and used spill equipment to an appropriate place within the licensed premises for licensed waste disposal and/or remediation.

7.2 INCIDENT FOLLOW UP ACTIONS

Subsequent to an incident, either material (Section 3) or minor (Section 7.1), the following must be undertaken:

- Undertake further monitoring/ testing if required.
- Complete incident report.
- Organise restocking of spill equipment.
- Complete government reports, as necessary.
- Implement corrective actions to avoid reoccurrence.
- Test the PIRMP within one month of the incident.

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

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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 3**). 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 Stratford Coal Mine. 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 Stratford Coal Mine 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 3** 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 3**) 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 3**, (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

SCPL has a procedure for introducing new chemicals to site using the 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).

The Risk Assessment has evaluated the 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 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 Coal Incident Report Form on CMO.

10.1 HOW IDENTIFIED RISKS TO HUMAN HEALTH 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 Yancoal Emergency Management 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.

Administrative Controls

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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 require all relevant Stratford Coal 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 to mitigate the effects from these events through the use of best practices and employee training. Further, storage dams on site have been built to withstand 1:100 year flood events and are regularly inspected.

10.1.3 SAFETY EQUIPEMENT / 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 Emergency Management Principal Control Plan for full detail of the emergency resources and equipment at SCM. On-Site Emergency Resources and devices include:

- Emergency First Aid Room;
- 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;

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- 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

Employees, contractors and visitors shall be familiarised with the conditions of the PIRMP:

- Initially, as part of 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 Stratford Mine Site 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 if a discharge to the sewer or stormwater is involved;
- 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 REVIEW

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.

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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, Stratford Coal Mine 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 (CMO) 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

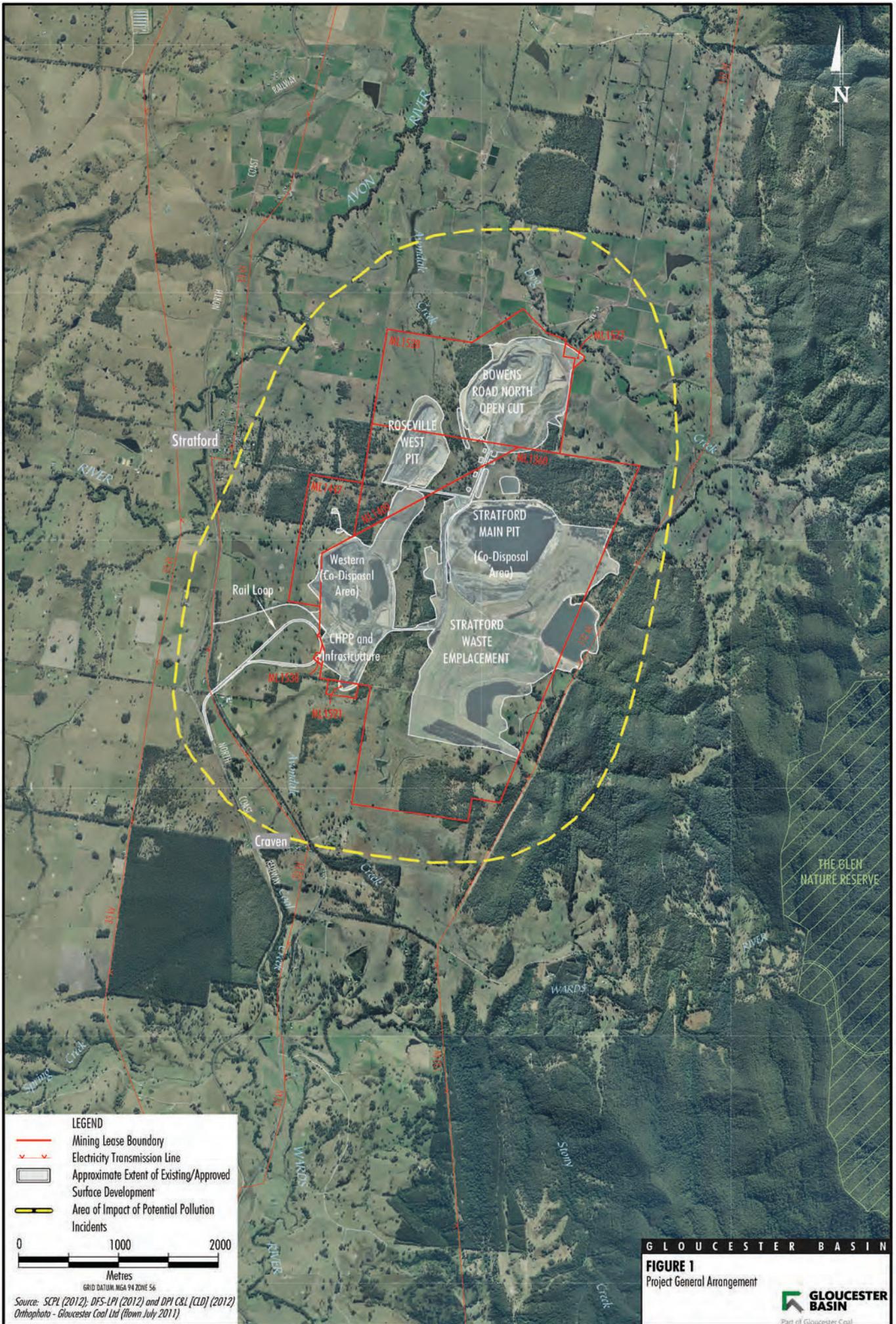
A protocol for the managing and reporting of complaints has been developed as a component of SCPL's Environmental Management Strategy.

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 SCPL's Environmental Management Strategy.

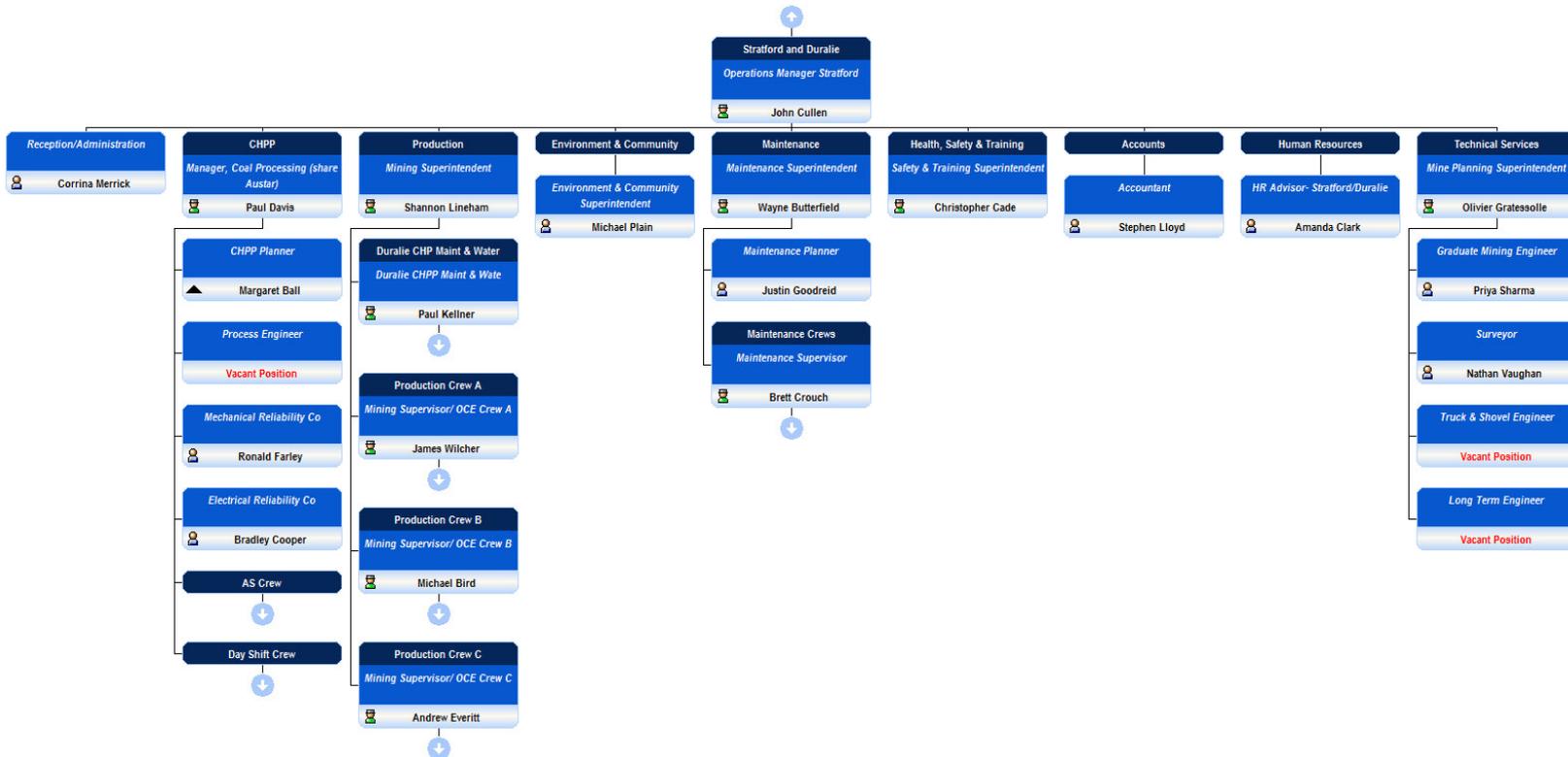
FIGURES
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Stratford and Duralie



Spill Response Kit Locations



Stratford Mine

Legend

▲ Spill Kit

APPENDIX A
PIRMP RISK ASSESSMENT

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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)		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)		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)		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)		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. 12-787-R-006	
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):
9) MAXIMUM REASONABLE POTENTIAL FOR POLLUTION FROM THESE CIRCUMSTANCES:
10) INITIAL REMEDIAL ACTIONS TAKEN:
11) NOTIFICATION PROVIDED TO (name and position):
12) OTHER INFORMATION



Stratford Coal Mine

Pollution Incident Response Management Plan

PIRMP Authorities Notification Form

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	Pollution Line 131 555
NSW Minister for Health	(02) 4924 6477 (diverts to John Hunter Hospital) ask for Public Health Officer on call
NSW Fire and Rescue	000 (Emergency) (02) 6558 1703 (Gloucester Fire Station)
Workcover NSW	Switchboard 13 10 50
MidCoast Council (Gloucester Office)	(02) 6538 5250

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

Incident scenario:

Audit:

TEST	PASS (yes/no)	Comments
Did the personnel assess the risks involved and clear the area if safe to do so?		
Did the personnel check the MSDS and 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?		
Did the control room fill out the Pollution Incident Notification Form?		
Did the control room immediately contact the person authorised to activate the PIRMP and notify authorities?		
Did the person who was authorised to activate the PIRMP notify the person responsible for implementing the response?		
Did the person notifying the authorities know who to contact and where this information is available?		
Was the response for activating the PIRMP done so in a timely manner?		
Was the response effective in containing the pollution?		

Results of audit (include requirements for further training):

Personnel Knowledge Check Scenario

NAME OF PERSONNEL BEING TESTED:

POSITION:

Testing of the PIRMP:

TEST	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 an 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:

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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. 12-787-R-006	
Document ID: Pollution Incident Response Management Plan	

**POLLUTION INCIDENT RESPONSE
FLOW CHART**

- Person involved in incident to complete
- OCE or Supervisor to complete
- E&C Manager to complete

Pollution Incident Occurs

Assess Risks

- Deliver 'First Aid' if persons are injured & ensure safety of people.

Isolate Spill Source and Contain

- Remove ignition sources—flames, sparks, smoking.
- If safe to do so, stop the spill & turn off equipment.
- Prevent spills to waterways and soil - use spill kits, absorbent material and earth mounds.

Notify OCE/Control Room or Supervisor

- By two-way radio- **Channel 1 or 3 or Mobile 0448 584 219.**
- State "Emergency Emergency Emergency".
- Follow instructions from OCE. Notify emergency services if required.
- Complete INCIDENT NOTIFICATION FORM.

Notify Person Authorised to Activate the PIRMP

- Environment and Community Superintendent – Michael Plain - **0428 255265**

Notify Operations Manager

- Operations Manager— John Cullen - **4999 5108 or 0407 342 798**
- Complete AUTHORITIES NOTIFICATION FORM.

Environment &Community Department Notify EPA Pollution Line 131 555

Major Pollution Incident Advice

- Confirm the incident response required with 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 8800
- WorkCover NSW** 13 10 50 (Switchboard)
- MidCoast Council** (02) 6591 7222

Implement Response

- Follow Incident Response Procedure.

Implement Response

- Follow instructions of authorities contacted and **Yancoal Emergency Management Principal Control Plan (refer CMO).**

APPENDIX D
PIRMP
POTENTIAL POLLUTANT INVENTORY &
MAXIMUM CHEMICAL STORAGE QUANTITIES

Stratford Coal – Pollution Incident Response Management Plan	
Revision No. 12-787-R-006	
Document ID: Pollution Incident Response Management Plan	

Stratford Coal Mine

Pollution Incident Response Management Plan

POTENTIAL POLLUTANT INVENTORY &

MAXIMUM CHEMICAL STORAGE QUANTITIES (>1000 L)

Chemical	Capacity	Location	Status
Sediment Laden Water		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 Fuel Farm	In use
Transmission Fluid (TFC460)	12,000 L	SCPL Workshop	Not in use
Transmission Fluid (TFC430)	12,000 L	SCPL Workshop	Not in use
Transmission Fluid (TFC410)	1,000 L	SCPL Workshop	Not in use
Engine Oil (15W40)	12,000 L	SCPL Workshop	Not in use
Diesel	10,000 L	Stratford CHPP	In use
Concentrated Flocculent	10,000 L	Stratford CHPP	In use
MET Froth	20,000 L	Stratford CHPP	In use
Coarse Lime	200 T	Stratford CHPP	In use
Meadow Lime	60 T	Stratford CHPP	In use
Hydrate Lime	14 T	Stratford CHPP	In use
Magnetite	125 T	Stratford CHPP	In use