

HUNTER VALLEY OPERATIONS

Plan

Pollution Incident Response Management Plan

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1 Purpose

As the holder of Environmental Protection Licence 640, HVO is required to comply with Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

The Pollution Incident Response Management Plan (PIRMP) 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). Appendix A - outlines where the required information can be found in this document.

The PIRMP sets out actions that need to be taken in the event of an environmental emergency at HVO.

The objectives of the PIRMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment and Operations Act 1997 (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

2 Training

All relevant personnel will receive training or instruction on the relevant parts of this document. New starters receive information as part of their induction process. Training records are maintained.

In addition, routine training exercises involving key personnel across each site may be used to test the PIRMP.

3 Testing, Review and Maintenance

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

1. The PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure.
2. A review of the PIRMP will occur every 12 months.
3. 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.

The Environment & Community Manager must approve all changes to this plan.

4 Availability of PIRMP

The PIRMP will be made publicly available within 14 days of finalisation (taken to be authorisation of the PIRMP by the Environment and Community Manager) via the Hunter Valley Operations website:

<https://insite.hvo.com.au/document-library>

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.

The PIRMP is maintained as an internal controlled document. Electronic copies are managed electronically within the site's Site Document Register (SharePoint) and the HVO Insite page, which can be accessed by the public at the following address:

<https://insite.hvo.com.au/document-library/management-plans-hvo>

5 Incident Response

In the case of an incident, that presents an immediate threat to the health and safety of people or threat to property the emergency notification procedure shall be enacted.

1. Ensure the immediate safety of everyone.
2. Notify:
 - a. By radio – Press RED button on radio, then press PTT Key (Push to Talk) to speak;
 - b. By telephone – 2222 or (02) 6570 0222
3. Say - **EMERGENCY, EMERGENCY, EMERGENCY**
4. Then state clearly
 - a. Your name;
 - b. Nature of the emergency;
 - c. Location of emergency; and
 - d. What assistance is required.
5. Control Room Operator will:
 - a. Notify Emergency Services Officer (ESO) on duty;
 - b. Notify Mining Shift Supervisor;
 - c. Await further instructions from the ESO and Mining Shift Supervisor.
6. If required, evacuate the area and assemble at your emergency muster point.

Where practicable, immediate actions should be taken to control and contain the pollution incident to mitigate any potential impact.

Incidents that happen at site will vary in the severity of the impact they create. Most can be handled as part of normal operational procedures and will not require escalation to an emergency.

Where there is no immediate threat to the health and safety of people or threat to property the event must be immediately communicated to the individual's supervisor. The supervisor or incident reporter must then immediately notify a member of the Environment & Community team, to ensure that any impact is appropriately managed and an assessment made as to whether the event is notifiable under the PIRMP.

Figure 1 outlines the process of responding to a pollution incident under emergency and non-emergency situations.

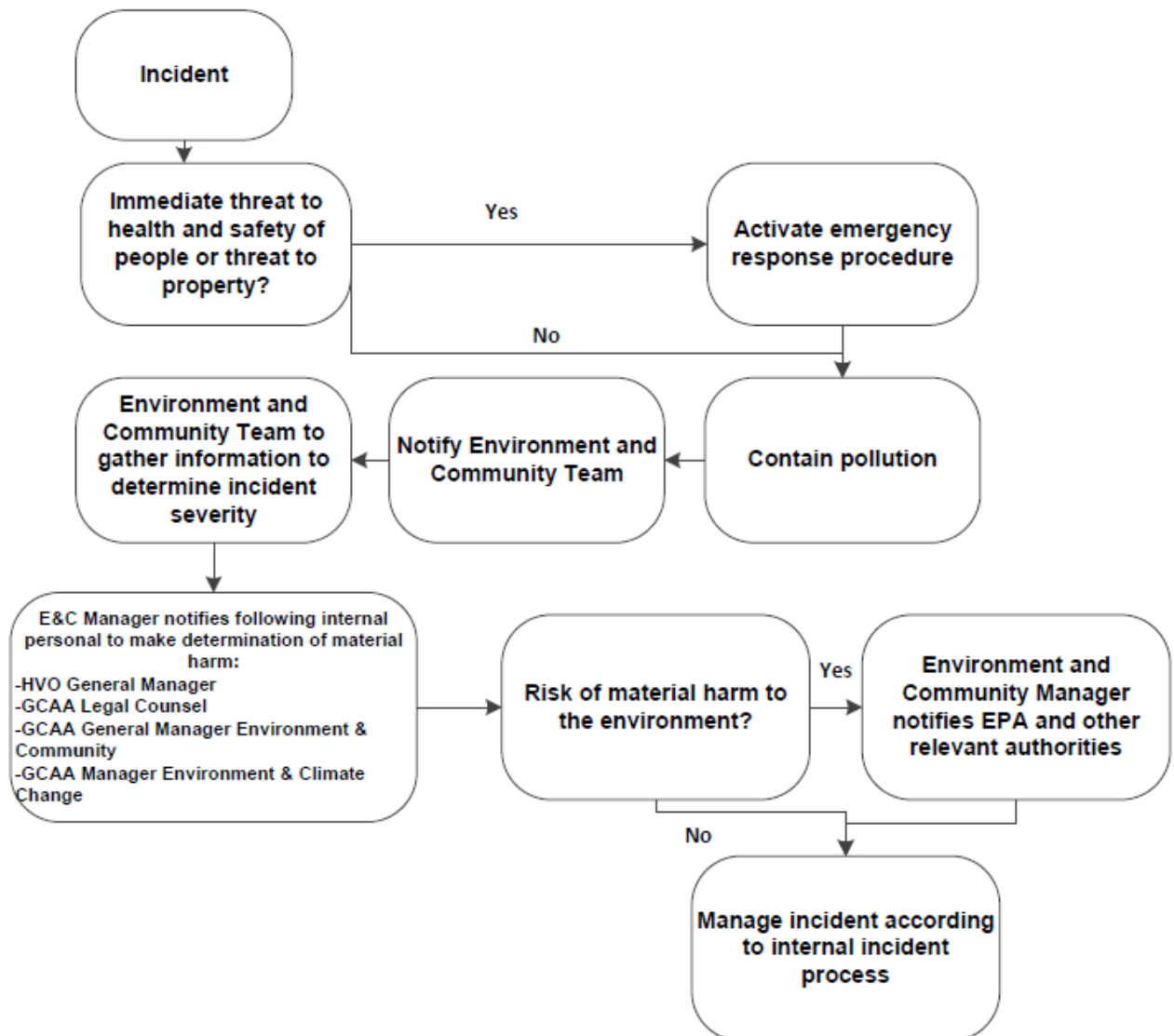


Figure 1 – Pollution Incident Response Process

5.1 Incident Response Scenarios

An incident causing offsite discharge of water pollutants is the most likely scenario to threaten risk of material harm to the environment requiring activation of the PIRMP.

Discharge of water pollutants has the potential to occur via the following scenarios:

- Hazardous Substance Spills; and
- Failure of Tailings or Water Storage Facilities.

5.1.1 Hazardous Substances Spill

HVO stores and uses quantities of hazardous substances, as listed in SafeWork Notifications of Dangerous Goods on Premises. Substances include, but are not limited to, fuels and lubricants used for equipment or machinery, waste materials or wastewater and chemicals used in cleaning or production processes.

The potential for an unplanned hazardous substance spill to cause material harm is present only if the spill has occurred in close proximity to the site tributaries and could not be contained on site through the emergency response procedures.

5.1.2 Failure of Tailings or Water Storage Facilities

Failure of storage facilities that contain tailings and poor quality water (including effluent and high sediment loads) has the potential to result in offsite water pollution.

Water storages at HVO, which have potential to spill offsite, include:

- Dam 9W;
- Dam 11N;
- Dam 15S;
- Dam 16S;
- Dam 19S;
- Dam 23S;
- Dam 28S;
- Dam 14W;
- Dam 16W;
- Dam 15N;
- Dam 16N;
- Dam 17N;
- Dam 18N;
- Hunter Valley Load Point Sump;
- Newdell Load Point Sump 060;
- Newdell Load Point Sump 070;
- Bayswater Creek Dam;
- Hunter River Bridge Sediment Sumps;
- Howick Truck Wash Dams;
- Active Tailings Dams

Failure of any of the dams leading to offsite flow may occur as a result of:

- Contents exceeding storage capacity and spilling from the dam
- Failure of water infrastructure linked to the dam (i.e. Pipes, valves, pumps and spillways)
- Major embankment failure

The potential for material harm offsite if a dam failure occurs is in changes to the Flow Rate, Total Suspended Solids, Electrical Conductivity, or pH of the receiving waters.

6 Notification to Neighbours and Community

NO EMERGENCY DETAILS TO BE RELEASED TO UNAUTHORIZED PERSONS (e.g. MEDIA) WITHOUT GENERAL MANAGER'S PERMISSION

Communicating with neighbours and the local community is an important element in managing the response to any incident. Early warnings and regular updates (during and post incident) are to be provided (after appropriate internal approval) to the owners and occupiers of premises who may be affected by an environmental incident occurring at Hunter Valley Operations. A current register of near neighbours and residents is kept internally and will be used to inform the necessary people of a pollution incident.

Communication mechanisms may include incident notifications placed on the HVO website, the use of telephone calls or SMS, as appropriate to the circumstances. The most appropriate communication mechanism will be employed based on the particular details of the incident, such as time of day, incident severity, available communication mechanisms and persons directly or immediately affected by the incident.

Examples of the notification advice for pollution incident scenarios are provided in Table 1.

Table 1 - Notification to Neighbours and Community: Examples of Information That May Need to be Communicated.

Potential Pollution Emergency	Stakeholders to be notified	Key message	Possible Communication Mechanism During an Incident	Possible Communication Mechanism Post Incident
Hazardous Substance Spill	<ul style="list-style-type: none"> • Near neighbours • If road closures are required – likely traffic such as emergency services and school buses. 	<ul style="list-style-type: none"> • Avoid incident zone 	<ul style="list-style-type: none"> • Phone call /SMS • Website notification 	<ul style="list-style-type: none"> • Website notification • Phone call/SMS
Failure of Tailings or Discharge Dam	<ul style="list-style-type: none"> • Downstream neighbours • If road closures are required – likely traffic such as emergency services and school buses 	<ul style="list-style-type: none"> • Relocate livestock and equipment • Keep clear of creeks and waterways • Do not use water from the local creeks until further notice 	<ul style="list-style-type: none"> • Phone call /SMS • Website notification 	<ul style="list-style-type: none"> • Website notification • Phone call/SMS

7 Dangerous Good Inventory

Table 2 - Hydrocarbon and on-site Explosives Inventory at Hunter Valley Operations

Facility	Class	Max. Storage Capacity per facility (L)	Number of Facilities
Diesel tank	C1	105,000	6
Combustible liquids tank	C1	600,000	1
Diesel tank	C1	95,000	3
Diesel Tank	C1	70,000	1
Combustible liquids tank	C1	10,000	1
Combustible liquids tank	C1	30,000	1
Diesel tank	C1	40,000	1
Diesel tank	C1	110,000	6
Diesel tank	C1	55,000	18
Petroleum Liquefied Gases tank	C1	75,000	1
Ammonium Nitrate Emulsion	5.1	80,000 (Kg)	3
Ammonium Nitrate	5.1	55,000 (Kg)	2

Material Type	Total Quantity On Site
Explosives	350,000 (Kg)
Hydrocarbons	3,390,000 L

8

Maps

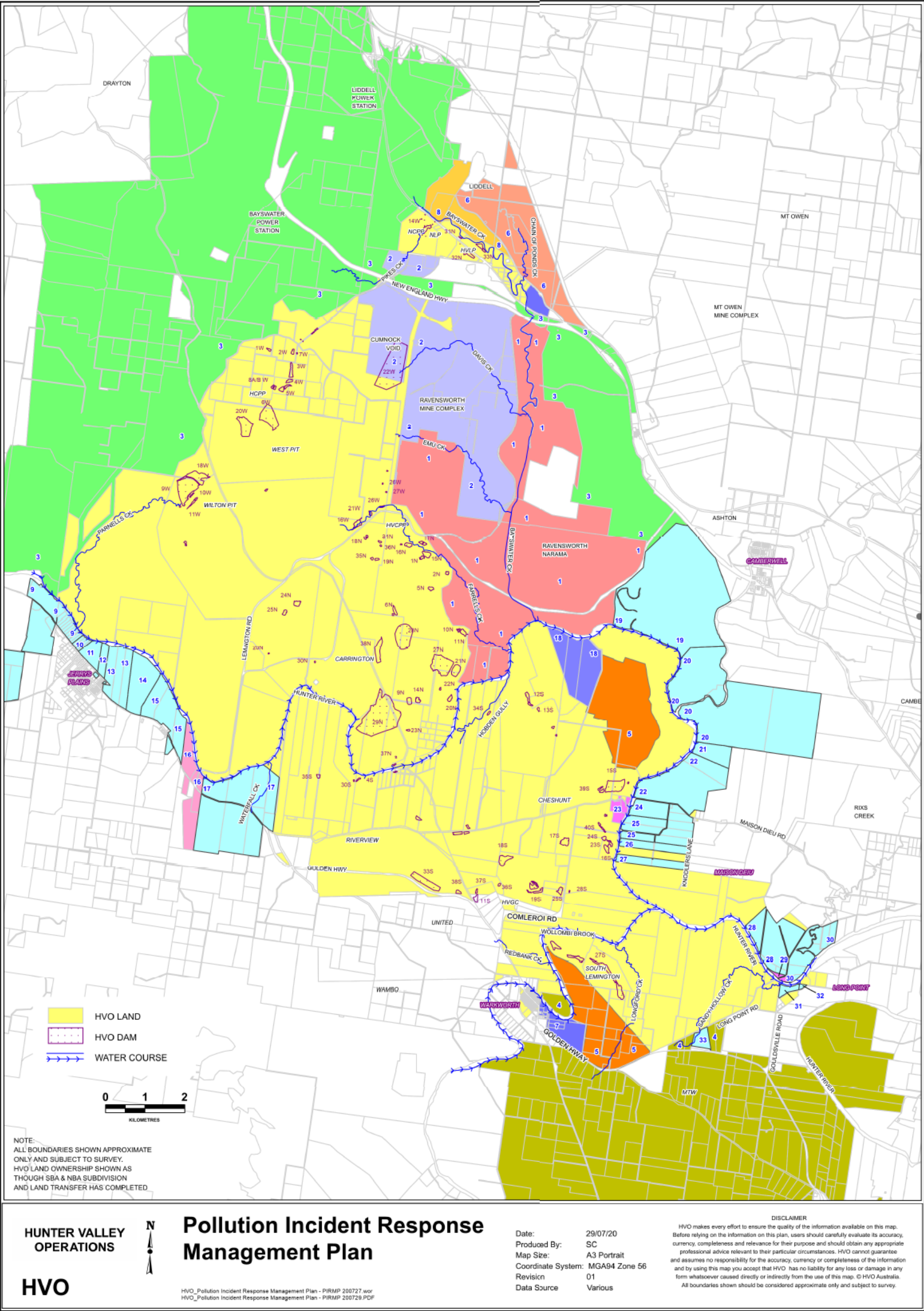


Figure 2 - Reference for managing the likely impacts of environmental pollution incidents at HVO.



Figure 3 - Hazardous Chemicals Bulk Storage Location

9 Contact Information

9.1 HVO Contact Numbers

Role	Contact Number
Environment & Community Officer	0455 782 292
Environmental & Community Coordinator	0427 701 534
Environment & Community Manager	0428 494 452
Dispatch	02 6570 0192

Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) requires the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify relevant authorities when material harm to the environment is caused or threatened. The decision on whether to notify of the incident in accordance with Part 5.7 of the POEO Act should not delay immediate actions to provide the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe to do so.

Firstly, call 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 require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

- Environment Protection Authority
- Ministry of Health via the local Public Health Unit
- SafeWork NSW
- Singleton Shire Council
- Fire and Rescue NSW

In addition, the following agencies will be contacted in accordance with other site approvals if relevant:

- Department of Planning Industry and Environment
- Department of Planning and Environment Resource Regulator

9.2 PIRMP Notification Contacts

Department	Contact Details
Environment Protection Authority (EPA):	Phone Environment Line on 13 15 55 (NSW only)
Fire and Rescue NSW	1300 729 579
The Ministry of Health via the local Public Health Unit: Newcastle Office	(02) 4924 6477 Fax (02) 4924 6048 <i>After Hours Contact:</i> (02) 4924 6477 (diverts to John Hunter Hospital) - ask for Public Health Officer on call
SafeWork NSW	13 10 50
Singleton Shire Council	(02) 6578 7290
Muswellbrook Shire Council	(02) 6549 3700 Council After Hours: Ph. 6549 3700.
Department of Planning Industry and Environment	02 6575 3400 or 1300 305 695
Department of Planning and Environment Resource Regulator	02 4063 6666
Emergency Services (only in an emergency)	000

10 Accountabilities

The roles and responsibilities related to an environmental incident under the PIRMP are detailed below in Table 3.

Table 3 – Accountabilities related to an environmental incident

Roles	Accountabilities
All employees and contractors	<ul style="list-style-type: none"> Contain pollution where possible. Immediately notify Supervisor of an environmental pollution incident
Supervisors	<ul style="list-style-type: none"> Immediately notify Environment & Community team of the incident.
Environment & Community Coordinator	<ul style="list-style-type: none"> Coordinating the response to a pollution incident. Coordinate training provided to site personnel in the implementation of this PIRMP. Communication of the requirements of this PIRMP to site personnel. Assist the Environment and Community Manager during site inspections with EPA and other agencies Arrange testing and review of the PIRMP as required.
Environment & Community Manager	<ul style="list-style-type: none"> In accordance with Section 5, make a determination as to whether the incident (as defined in section 147 of the POEO Act) is notifiable to external agencies. Managing the response to a pollution incident. Undertake notifications to EPA and external agencies as defined in the PIRMP. Facilitate site inspections with EPA and other agencies. Coordinating community notifications as defined in the PIRMP.
HVO General Manager	<ul style="list-style-type: none"> Providing adequate resourcing for implementation of the PIRMP. Authorised to liaise with relevant authorities. Authorise communications to public and media.

11 Definitions

Name	Definition
Emergency	<ul style="list-style-type: none"> An emergency is a situation that is developing, or has developed, that poses a threat to Life the Environment and Property, which necessitates immediate action.
Pollution Incident	<ul style="list-style-type: none"> 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. A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as: <ul style="list-style-type: none"> harm to the environment is material if: <ul style="list-style-type: none"> it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or 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 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. HVO shall report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. Notification to EPA follows an assessment of the severity of an incident and initial containment of any pollution.

12 Document Information

12.1 Reference Information

Reference
HVO Acknowledgement of Notification of Dangerous Goods on Premises 2014
HVO Chemicals Register- ChemAlert
Protection of the Environment Operations Act 1997 (POEO Act)
Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation)

12.2 Change Information

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

Version	Date	Review Team	Details of Change
1	30 August 2012	Environmental Specialist – Chris New	Original
2	22 August 2013	Environmental Specialist – Chris New	Annual Review
3	30 December 2014	Environmental Specialist – Chris New	Annual Review Minor changes to internal response system. Addition of PIRMP testing record. Updates to Dangerous Goods inventories and locations to reflect audit findings in the Environmental Protection Authority (EPA) 2013 Compliance report.
4	27 January 2016	Environmental Specialist – Chris New	Annual review and update
5	10 January 2017	Environmental Specialist – Chris New	Annual review
6	3 May 2017	Environmental Specialist – Chris New	Updated to incorporate findings from EPA Dam Safety Audit
7	13 November 2017	Environmental Advisor – Daniel Solomon	Updated document to Yancoal template
8	21 December 2017	Environmental Specialist – Andrew Hodge	Annual Review
9	27 August 2018	Environment & Community Coordinator – Dominic Brown	Update to HV Operations Format. Update following PIRMP Activated - May 2018.
10	1 February 2019	Environment & Community Coordinator – Dominic Brown	Annual Review. Update following PIRMP Activated – October 2018.
11	11 April 2019	Environment & Community Coordinator – Dominic Brown	Update template Update following PIRMP Activated – March 2019

Version	Date	Review Team	Details of Change
12	31 July 2019	Environment & Community Coordinator – Dominic Brown	Inclusion of Appendix A -
13	30 July 2020	Environment & Community Officer – Merri Bartlett	Annual Review
14	06/11/2020	Environment & Community Coordinator – Keith Simkin	Update of Section 12.3

12.3 Testing History

Testing	Date	Description	Coordinator
1	October 2013	Annual testing of PIRMP	Senior Advisor Emergency Services
2	19 September 2014	Annual testing of PIRMP	Senior Advisor Emergency Services
3	19 November 2015	Annual testing of PIRMP	Senior Advisor Emergency Services
4	3 May 2017	Annual testing of PIRMP	Senior Advisor Emergency Services
5	14 December 2017	Annual testing of PIRMP	Senior Advisor Emergency Services
6	10 October 2018	Annual testing of PIRMP	Health Safety and Training Manager
7	3 September 2019	Annual testing of PIRMP	Health Safety and Training Manager
8	30 July 2020	Desktop based testing of PIRMP	Environment & Community Officer

Appendix A - PIRMP Document Register

Section/ Clause Requirement		Location within PIRMP
POEO Act 1997 no 156	A pollution incident response management plan must be in the form required by the regulations and must include the following:	
153C (a)	The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and (iii) any persons or authorities required to be notified by Part 5.7,	Part 6 and 9
153C (b)	A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,	Part 5
153C (c)	The procedures to be followed for coordinating, 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,	Part 5
153C (d)	Any other matter required by the regulations.	See below
POEO (G) Regulation		
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),	Part 5
98C (1) (b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	➤ Site Risk Register (<i>Located on Site Intranet - SharePoint</i>)
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,	➤ Site Risk Register (<i>Located on Site Intranet - SharePoint</i>)
98C (1) (d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity,	➤ Chemicals Register (Chemalert)
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,	➤ Chemicals Register (Chemalert)
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,	➤ <u>HVOOC-1797567310-1823 Hazardous Substances and Dangerous Goods Procedure (SharePoint)</u> ➤ <u>HVOOC-1797567310-1018 CNA Hydrocarbon Management Plan (SharePoint)</u>
98C (1) (g)	The names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and	Part 9

Section/ Clause Requirement		Location within PIRMP
	(ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident,	
98C (1) (h)	The contact details of each relevant authority referred to in section 148 of the Act,	Part 9
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,	Part 6
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,	Part 5
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,	Part 8
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,	Part 1
98C (1) (m)	The nature and objectives of any staff training program in relation to the plan,	Part 1
98C (1) (n)	The dates on which the plan has been tested and the name of the person who carried out the test,	Part 1
98C (1) (o)	The dates on which the plan is updated,	Part 1
C (1) (p)	The manner in which the plan is to be tested and maintained.	Part 1