Whitehaven

WHC-PLN-TAR_POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN - INTERNAL		
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Tarrawonga Coal Mine Pollution Incident Response Management Plan

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Acronyms used throughout the Document

EPA	-	Environmental Protection Authority
EPL	-	Environmental Protection Licence
PIRMP	-	Pollution Incident Response Management Plan
POEO Act	-	Protection of the Environment Operations Act 1997
POEO Regulation	-	Protection of the Environment Operations (General) Regulation 2022
NRAR	-	Natural Resource Access Regulator

1. Introduction

As the holder of Environment Protection Licence (EPL) 12365, Tarrawonga Coal Mine is required to comply with Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and Part 3A of the Protection of the Environment Operations (General) Regulation 2022 (POEO Regulation) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

The PIRMP must include the information detailed in section 153C of the POEO Act and clauses 71 and 72 of the POEO Regulation.

This PIRMP has been prepared to satisfy these legislative requirements and sets out the actions to be undertaken in the event of a pollution incident at Tarrawonga Coal Mine. The Plan outlines the procedures, responsibilities and response measures for managing pollution incidents and minimising potential impacts on human health and the environment.

The objectives of this PIRMP are to:

- ensure comprehensive and timely communication of pollution incidents to site personnel, the NSW Environment Protection Authority (EPA), other relevant authorities, and members of the community who may be affected by a pollution incident;
- minimise and control the risk of pollution incidents through the identification of hazards and implementation of appropriate mitigation and management measures;
- provide a framework for responding to pollution incidents in a manner that minimises impacts on human health and the environment; and
- ensure the Plan is appropriately maintained, tested and reviewed to confirm its accuracy, currency and suitability.

Tarrawonga Coal Mine is operated by a wholly owned subsidiary of Whitehaven Coal Limited (Whitehaven).

This PIRMP applies to the premises as defined under EPL 12365. Details of the EPL and licensed premises are provided in Table 1

Table 1 - Site Details

Site	Local Authority	EPL ID	Activity	Scale
Whitehaven Coal Mining Limited – Tarrawonga Coal Mine	Narrabri Shire Councils	12365	Coal Works	>2,000,000 T – 5,000,000 T handled
			Coal Mining	>2,000,000 T – 3,500,000 T produced

2. Site Hazards

The potential major hazards identified for the site, their causes, likelihood of occurrence and the relevant controls in place are detailed in Table 2.

Table 2 - Site Hazards

Hazard	Cause	Rank	Controls
Discharge of surface water above acceptable water quality criteria	Above average rainfall and inadequate storage and/or pumping capacity on site	Moderate	WHC_PLN_TAR_Water Management Plan. Regular review of discharge dam storage capacities; pumps on station to drain storage dams as required; flocculant available to settle out sediment in advance of controlled discharge; priority pumping from dams with reduced capacity for use by water carts ahead of predicted rainfall.
Discharge from unauthorised Dam (i.e. Pit Water)	Overfilling of unauthorised water storage (i.e. Pit) or failure of water storage dam.	Low	WHC_PLN_TAR_Water Management Plan. Water level signage; Operating procedure requiring observation of pit levels during active pumping.
Air Quality Impacts above air quality criteria	Inadequate dust suppression.	Moderate	WHC_PLN_TAR_75W Mod_Air Quality & Greenhouse Gas Management Plan. Visual review of dust on site to verify adequate dust suppression; Monitor real-time PM10 dust levels as compared to criteria; Weather station data to confirm wind speed/direction to assess if conditions are likely to be unfavourable.
	Unfavourable weather conditions.	Moderate	WHC_PLN_TAR_Blast Management Plan. Daily review of dust on site to verify adequate dust suppression; PM10 data to verify dust levels as compared to criteria; Weather station data to confirm wind /direction to assess if conditions are likely to be unfavourable.
Fume/Odour	Blasting at site results in generation of fume spreading off the lease area and onto neighbouring properties, or neighbouring mine sites/	Moderate	WHC_PLN_TAR_Blast Management Plan. Blasting contactor working on continuous improvement program, including measures to reduce potential for fume events; Sentries in place during every blast to monitor fume levels and assess appropriate response; Pre-blast risk assessment completed, and blast design gives due consideration to fume potential which is considered in product selection.
Hydrocarbon/chemical spills resulting in land and/or water contamination	Significant spill during transfer from service truck to plant item.	Moderate	WHC_PRO_Chemical and Hydrocarbon Spill. Service truck used with fuel/oil cells for fluid transfer; Spill Kits available on service truck; Operator training for services from the service truck.
	Rupture of IBC during transport.	Moderate	WHC_PRO_Chemical and Hydrocarbon Spill. All chemicals used on site are retained within a storage area that is either self-bunded (storage container) or is located within the oil farm and drains to oil/water separator. All chemicals delivered to site are accompanied by SDS.
Fire Outbreak	Significant spontaneous combustion of coal onsite or equipment or building on fire or bushfire causing off-site odour/fume.	Low	WHC_PLN_TAR_Emergency Response Control Plan. TAR_Fire and Explosion TARP All sites follow procedure for inspection of stockpiles for instances of spontaneous combustion. Procedures in place for spontaneous combustion if identified on site; Each site retains its own fire tender to manage any outbreak of spontaneous combustion and/or bushfire.

Hazard	Cause	Rank	Controls
Coal Spill	Significant spillage of coal from coal haulage truck on public road.	Moderate	All coal haulage trucks are required to have trailers covered prior to departure from site; Written procedure confirming requirement for covered trailers; Platforms provided at site for clean off of tarps prior to exit from site.
Waste	Unauthorised dumping of waste causing contamination of surface/groundwater and/or land contamination.	Low	WHC_PLN_TAR_Waste Management Plan. All products delivered to site require identification and notification to the Project Manager; No deliveries permitted by unauthorised vehicles; No access to the pit by unauthorised vehicles.

3. Inventory of Pollutants

Table 3 includes maximum inventories for major potential pollutants stored onsite.

Table 3 - Major Potential Pollutants Inventory

Pollutant Type	Location	Approx. Maximum Quantity
Diesel	Workshop and Service Cart	466,315 L
Oils and Lubricant	Workshop and Service Cart	6,000 L
Dust from Coal Stockpiles	ROM Pad and Crusher	Unknown
Saline Water	Pit – Mine water dams	288 ML
Blast Fume (NO2)	In-Pit	Unknown
Spontaneous Combustion (CO and SO2)	Coal Stockpiles	Unknown

Potential pollutants that can be generated by activities on site are listed in Table 4.

Table 4 - Potential Pollutants from Activities on the Premises

Pollutant Type	Location	Approx. Maximum Quantity
Sediment laden water	Discharge Points (Sediment Dams)	245 ML

4. Map

The map in Appendix 1 shows the location of the premises, the surrounding area that may be affected by a pollution incident, the location of pollutants on the premises, the location of any stormwater drains on the premises, and the discharge locations of stormwater to the nearest watercourse or water body.

5. Pre-emptive Actions

The following equipment and resources are available on site to minimise the risk of pollution incidents and support incident response activities:

- • Emergency spill kits, including absorbent materials and containment booms, are strategically located across the site and within mobile equipment to enable the prompt containment and clean-up of hydrocarbon and chemical spills.
- • Personal protective equipment (PPE) is available for the safe handling of chemicals and hazardous substances.
- • Fire extinguishers are installed on mobile equipment and at key site facilities.
- • Real-time dust monitoring equipment (PM10) provides continuous air quality information to assist in the management of mine-related dust impacts.
- • Earthmoving equipment is available to undertake containment, clean-up and remediation activities where required.
- • Oil/water separation infrastructure is installed within the workshop compound to capture and separate hydrocarbons from stormwater runoff.
- • Pumps are available to manage water levels within sediment dams and minimise the potential for uncontrolled discharges.
- • Water level markers are installed within water storages to assist with monitoring storage capacity and managing water levels.
- Actions undertaken to minimise risks to personnel on site include:
- • Provision and use of appropriate PPE, including gloves, respiratory protection, safety glasses, hard hats, steel-capped boots and long-sleeved clothing.
- • Implementation of emergency response procedures in accordance with the applicable Whitehaven Emergency Response Control Plan.
- • Installation and maintenance of emergency signage, including muster point locations and fire-fighting equipment identifiers.

- • Training, inductions and competency-based programs to ensure personnel understand their environmental and emergency response obligations.

6. Implementation of the Plan

6.1 Statutory Requirements

The PIRMP must contain at a minimum the requirements of Section 153C of the POEO Act and Clause 71 and 72 of the POEO Regulation, which corresponds with the information contained in Section 7 of this internal Plan.

6.1.1 Definitions

Under Part 5.7 of the POEO Act, it is a requirement that in the event of a pollution incident, notification is made immediately (promptly without delay) to the relevant authorities when material harm to the environment is caused or threatened.

Pollution is defined under the Act as:

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

Each of these types of pollution are defined in the Dictionary within the POEO Act.

The definition of a **pollution incident** is:

> *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 the notifies if there is a risk of '**material harm to the environment**' which is defined in section 147 of the POEO Act as:

a) *harm to the environment is material if:*
    i. *it involves actual or potential harm to the health and 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 $50,000 (or such other amount as it 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.*

It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

6.1.2 Employee and Company Notification Obligations

Under Section 148 of the POEO Act:

An employee must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority. "Employee" should be considered as any worker associated with the site.

Whitehaven, as the employer and/or occupier of the premises, must, after being notified by an employee or otherwise becoming aware of a pollution incident, immediately notify each relevant authority of the incident and all relevant information about the incident.

Whitehaven must take all reasonable steps to ensure that, if a pollution incident occurs in carrying on the activity of the employer or

occurs on the premises, as the case may be, the persons engaged by Whitehaven will, immediately, notify the employer or occupier of the incident and all relevant information about it.

In accordance with advice from the EPA, ensuring the safety of people at a site and containing a pollution incident to the maximum extent possible are critical. The decision on whether to notify should not delay immediate actions to ensure the safety of people or contain a pollution incident. However, incident notification should be made as soon as safe to do so.

6.2 Determination of Material Harm

Following initial emergency response actions, the site must immediately determine if the incident is notifiable by considering the requirements outlined in Section 6.1 above.

If notification is required, the processes to be followed are outlines in Section 7.

7. Notification and Communication Requirements

7.1 Internal

All workers must notify Whitehaven of a pollution incident in accordance with Section 148 of the POEO Act (Section 6.1.2).

In the event of an incident that requires an emergency response, the site's emergency management processes shall be implemented as per the Emergency Response Control Plan.

Note: measures should be taken to "control, contain, and clean up" a pollution incident. Containment of any spill should be undertaken if it is safe to do so, and immediately once contained (or if containment is not possible) the supervisor should be contacted to inform them of the incident.

7.2 External

If the incident presents an immediate threat to the human health or property, the site must contact 000 prior to any other action. Emergency services are the first responders and are responsible for controlling and containing incidents.

If the incident is determined to be notifiable under this Plan, and irrespective of whether emergency services have been contacted on 000, the site will contact the following authorities listed in Table as deemed relevant to the pollution incident.

Table 5 - Authorities to Contact

ID	Agencies	Contact Details
1	Environmental Protection Authority (NSWEPA)	131 555
2	Public Health Unit – Tamworth	(02) 6764 8000
3	Safework NSW	131 050
4	Local Government (Narrabri Shire Council)	Business hours: (02) 6799 6866 After hours/Emergency: 0429 911 111
5	Fire and Rescue NSW/Narrabri RFS FCC	1300 729 579 02 6792 3667
6	NSW Department of Planning and Environment	1300 420 596
7	Natural Resource Access Regulator (NRAR)	1800 633 362
8	Resource Regulator	1300 814 609

The following information must be provided in accordance with Section 150 of the POEO Act:

- The time, date, nature, duration and location of the incident,
- The location of the place where pollution is occurring or is likely to occur,
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- The circumstances in which the incident occurred (including the cause of the incident known),
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- Other information prescribed by the regulations.

In addition to the above agencies, notifications about the incident may also be required to be made outside of the requirements of this Plan. Additional notifications will be considered on a case-by-case basis and will generally be made to the regular Office of the relevant Department.

7.3 Community

The site may partake in an awareness campaign, or campaigns, for relevant neighbours and community members prior to any incidents occurring so that those individuals are prepared in the event of an incident occurring.

Where there is a known possibility of an unavoidable incident, precautions will be taken to provide prior warning to potentially affected landholders.

In the event of a notifiable pollution incident occurring, which impacts on neighbouring properties or the wider community, the affected landholder/s, neighbours and other community members who may be affected by the incident will be notified as soon as possible and informed as to any measures that could minimize the risk of harm as well as the control/containment and clean up mechanisms to be applied.

The type and frequency of follow-up correspondence on the incident will be determined on a case-by-case basis.

Details for neighbors and other relevant community members (contact details, location in relation to the site etc.) are provided in Appendix 2 of the internal plan.

Table 6 Includes details on the advice to the community in relation to specific incident events.

Table 6 - Advice to Community

Incident	Early Warning Mechanisms	Advice – Harm Minimisation
Air Quality – Visual Dust	Real-time dust monitor for management purposes and/or visual dust.	Remain inside with windows and doors until dust passes. Asthma sufferers should ensure they carry inhalers. In the event of a dust exceedance, residents to be provided with 'Mine Dust and You' NSW Health Fact Sheet.
Air Quality – Blast Fume/Spontaneous Combustion	Pre-blast notification.	Remain inside with windows and doors shut until air quality improves.
Water Discharge from unauthorised dam or above acceptable water quality criteria.	Monitor water levels in dams and weather forecast. Dewater dams as required. Monitor dams water quality.	Avoid consumption and/or use of affected/potentially affected waters until laboratory testing deems water suitable.
Fire outbreak	Inspect fire break before the dry-hot season or as required.	Remain indoors with windows shut to avoid smoke inhalation. If fire threatens property, evacuate to a safe location.

Incident	Early Warning Mechanisms	Advice – Harm Minimisation
Contamination of Soils or Water	Test and monitor according to monitoring program as required.	Avoid consumption/use of waters until they are deemed safe. Reduce/remove interaction with areas potentially affected by soil contamination.

8. Training

All workers at, or associated with, the site must be made aware of this Plan, where it is located if it is required to be accessed, and what their obligations are in relation to the Plan.

Testing of the Plan, as detailed in Section 129, is used as method of training relevant personnel on the requirements of the Plan. Training (in addition to testing the Plan) will be determined and undertaken as required.

9. Testing of the Plan

In accordance with Section 153E of the POEO Act, and Section 73(e-g), and 75 of the POEO Regulation:

- A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.
- The two usual methods of testing are undertaking desktop simulations and/or practical exercises or drills.
- Any such test is to be carried out:
    - Routinely at least once every 12 months;
    - Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates, following an incident that results in or has the potential to cause material harm. Assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Records of testing must be maintained and must include:

- Details of how the testing was undertaken (the method of testing, the scenario used etc.)
- The date(s) of testing
- Participants
- Any updates made/to be made to the Plan as a consequence of testing.

Records must be maintained in accordance with WHC-STD-Record Management.

10. Availability of the Plan

The Plan is to be made readily available:

To an authorised officer on request; and

At the premises (as minimum in hard copy in a readily accessible location) to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the Plan.

The abbreviated version of the Plan is to be made publicly available in a prominent position on the Whitehaven website.

To maintain privacy, contact details of specific individuals other than those of the agencies to be notified, should not be included in the website version of the Plan.

11. Document Review

The Plan must be reviewed and, if necessary, revised if one or any combination of the following occurs:

- At least once every 12 months following testing of the Plan;
- When potential pollutant inventories (in terms of type and/or quantity) change;
- When potentially polluting activities change; or
- Following a pollution incident that has triggered the Plan.

12. Responsibilities

Table 7 and Table 8 outline the roles and responsibilities in relation to this Plan. Each position must appoint a delegate who is able to perform these responsibilities in their absence. The delegate must clearly understand the responsibilities and other relevant personnel must be made aware of when the delegate is in place, who the delegate is and what their contact details are.

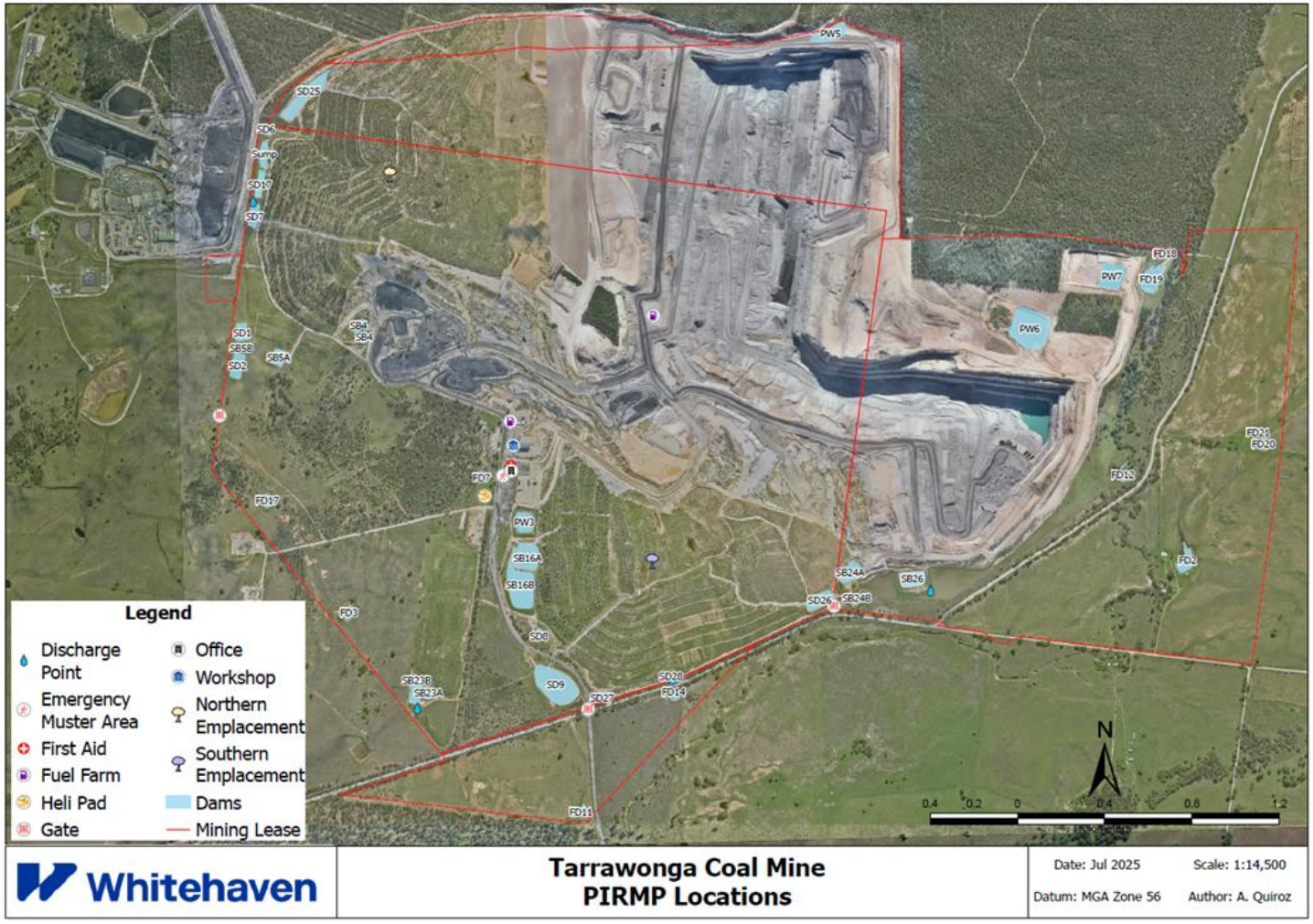
Table 7 – PIRMP Roles and responsibilities

Name	Responsibilities
Site Personnel and Contractors	• Be familiar with the PIRMP and emergency procedures. • Immediately report any pollution incident or potential pollution incident. • Implement initial containment measures where trained and safe to do so. • Follow instructions from supervisors and emergency responders. • Participate in training and testing exercises.
Operations Manager	• Ensure adequate resourcing (equipment and personnel) to implement the Plan. • Activating the Plan. • Managing the response to a pollution incident. • Implement required training and awareness for all workers. • Notifying and coordinating relevant authorities. • Ensure affected landholders and community members are notified. • Appoint a delegate ensuring they are appropriately trained to carry out responsibility of this Plan.
Environmental Superintendent	• Implement required training and awareness for all workers. • Ensure testing of the Plan is undertaken. • Activating the Plan. • Managing the response to a pollution incident. • Notifying and coordinating relevant authorities. • Notifying affected landholders and community members. • Maintain the internal and website versions of the Plan and ensure their availability.
Environmental Advisor/Officer	• Maintain the internal and website versions of the Plan and ensure their availability. • Coordinate testing of the Plan in consultation with relevant stakeholders. • Assist personnel with notification and incident response processes.
Production Superintendent	• Assist with notification and incident response processes. • Appoint a delegate and ensure they are appropriately trained to carry out responsibilities of this Plan.
Maintenance Superintendent	• Assist with notification and incident response processes. • Appoint a delegate and ensure they are appropriately trained to carry out responsibilities of this Plan.
Drill and Blast Superintendent	• Assist with notification and incident response processes. • Appoint a delegate and ensure they are appropriately trained to carry out responsibilities of this Plan.
Emergency Response Team	• Respond to incidents, contain pollutants and protect human health and the environment.

Table 8 – PIRMP Internal Contact List

Name	Position	24 hr Phone #
Matthew Sparkes	Operations Manager	
Matt Hollis	Environmental Superintendent	
Jesse Taylor	Production Superintendent	
Glenn Constable	Maintenance Superintendent	
John Neville	Drill and Blast Superintendent	

Appendix 1 – Premises Maps

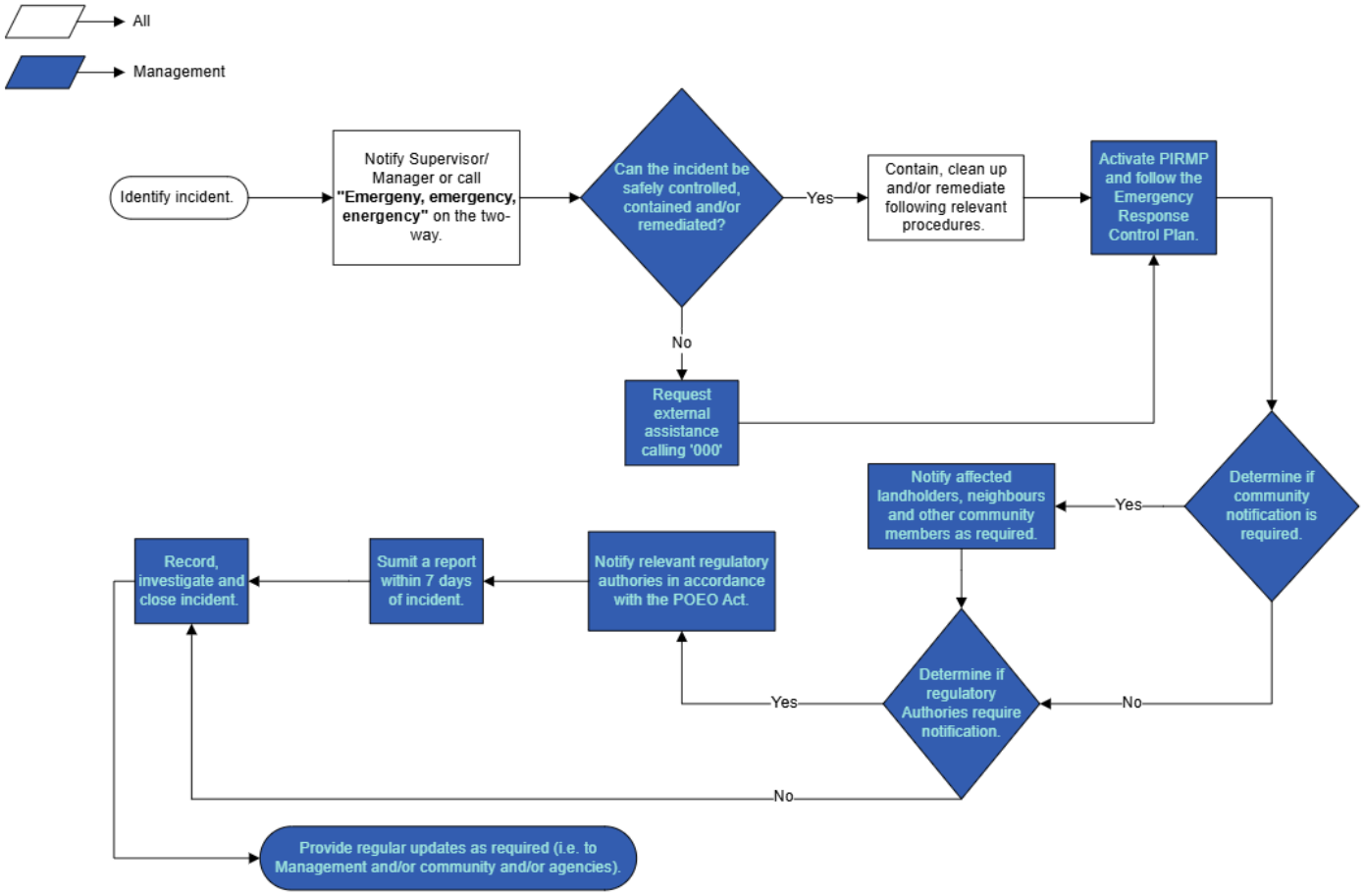


Appendix 2 – Landholders and Community Details

ID	Direction in Respect to Mine	Property	Contact	Phone Number
1	NNW	Boggabri Coal Mine		
2	NE	Leard State Forest		
3	NE	Green Hills (house)*		
4	NE	Sylvania/Coomalgah		
5	S	Ambardo*		
6	S	Callandar*		
7	S	Kyalla*		
8	S	Tarrawonga*		
9	S	Northam*		
10	S	Bungalow*		
11	SE	Braymont*		
12	SE	Templemore*		
13	SE	Bollol Creek Station (house)*		

*Indicates properties owned by TCM/Whitehaven Coal
Some properties are tenanted and are managed by agents. If unable to contact the above landowner/tenants, the agents are:
[1]

Appendix 3 – Actions to be taken during or immediately after pollution incident



Refer to Section 7.2 for notification requirements, agency contact details and community communication procedures.

Appendix 4 – Immediate Response for Specific Incidents

Air Quality

- Refer to the following:
  - TAR - Air Quality and Greenhouse Gas Management Plan (or latest version)
  - TAR - Blast Management Plan (or latest version)
  - WHC_PLN_OC_GOC_Spontaneous Combustion (or latest version)
- The Operations Manager in cooperation with the Site Environmental personnel will liase with the Group Manager - Environment (or delegate) to coordinate a response to the incident and determine environmental monitoring required.

Water Quality/Discharge

- Refer to the following:
  - TAR - Water Management Plan (or latest version)
- The Operations Manager in cooperation with the Site Environmental personnel will liase with the Group Manager - Water (or delegate) to coordinate a response to the incident and determine environmental monitoring required.

Chemical/ Hydrocarbon Spill

- Refer to the following:
  - WHC_PRO_Chemical and Hydrocarbon Spill Response (or latest version)
- The Operations Manager in cooperation with Site Environmental personnel will liase with the Group HSE team (or delegate) to coordinate a response to the incident and determine environmental monitoring required.

Fire

- The Emergency Coordinator and Fire Officer will coordinate the response in accordance with the WHC-PLN-OC-GOC-Emergency Control, WHC-PLN-OC-GOC-Fire or Explosion, and WHC-STD-OC-Fire Systems (or latest versions).
- Also refer to WHC_PLN_OC_GOC_Spontaneous Combustion (or latest version) in the case of Spontaneous Combustion.
- The Operations Manager (or delegate) will coordinate with the Rural Fire Service (if required) and provide assistance as requested.

Waste Disposal

- Refer to the following:
  - WHC-PLN-OC-GOC-Emergency Control (or latest version)
  - WHC_PLN_TAR_Waste Management Plan (or latest version)
- The Operations Manager in cooperation with Site Environmental personnel will liase with the Group HSE team (or delegate) to coordinate a response to the incident and determine environmental monitoring required.

Appendix 5 – Revision Table

Revisions	Revision Description	Author	Authorised by	Date
2.1	Updated fuel volume, removed PFAS and added PIRMP test information	M. Martin	C. Sullivan	Mar 2023
2.2	Updated contact and test information	M. Wright	M. Hollis	Sep 2024
2.3	Updated contact and test information, updated fuel volume, updated PIRMP location map	K. Boyton	M. Hollis	Jul 2025
2.4	Updated following EPL and POEO Regulation update. Updated into new internal template.	K. Boyton	M. Hollis	Jul 2026
2.5	Update of Operations Manager contact details	K.Boyton	M.Hollis	Sep 2026

Appendix 6 – PIRMP Test Table

Date	PIRMP Test Scenario	Facilitator	Participants
30 September 2022	Significant fume event from blasting.	M Martin	A Quiroz.
13 June 2023	Breach of bank of Pit Water Dam leading to uncontrolled discharge.	M Wright	A Quiroz, R George, A Rahman, S Payne.
3 June 2024	Wide variety of scenarios including plant fires and spills. Contacts require updating.	M Hollis	G Phillips, J Bennet, J Neville, R Geroge.
10 June 2025	Diesel/oil spill due to coal haulage truck rollover at site entrance, adjacent to creek crossing.	M Hollis	K Boyton, B Barnes, T Stocks, G Constable, C Martin, G Philip.
7 May 2026	Oil spill and fire in workshop due to hydraulic power pack leak.	M Hollis	J Taylor, G Constable, J Gill, D Sidhu