

# CULLEN VALLEY MINE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Shoalhaven Coal Pty Limited (Castlereagh Coal)
October 2025

#### **DOCUMENT REVIEW HISTORY**

Issue	Date	Description
1.0	5/02/16	Initial document prepared to meet the PIRMP guidelines.
2.0	13/12/17	Publish of Final Document.
3.0	20/12/18	Updated of PIRMP.
4.0	20/12/19	Review & update PIRMP
5.0	2/12/20	Review and Update
6.0	13/12/21	Review and Update
7.0	August 2023	Review and Update
8.0	December 2023	Review and Minor Update
9.0	19/12/2024	Review of PIRMP
10.	7/10/2025	Review and Update

#### **TESTING OF THE PLAN HISTORY**

Date	Description
25 November 2016	Light vehicle incident at CVM
13 December 2017	Excavator fuel line breakage at Cullen Valley Mine during earthworks on erosion control structures
12 December 2018	Spillage of oil from an excavator at the Invincible Pit Top
27 November 2019	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop
2 December 2020	Bushfire at Invincible Colliery.
13 December 2021	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop.
August 2022	Discharge from Dam 3 (Licensed Discharge Point 1) following a pump valve failure – potential EPL Licence threshold exceedances
18 December 2023	The simulation involved an engine oil spill incident and was conducted on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.
19 December 2024	Simulation of Service Truck Rollover
19 September 2025	Water Cart Oil Spill

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#### 1.0. INTRODUCTION

#### 1.1. Background

The purpose of the Cullen Valley Mine Pollution Incident Response Management Plan (PIRMP) is to:

- Provide direction to Castlereagh Coal personnel in responding to pollution incidents at Cullen Valley Mine operations;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Lithgow City Council, the Department of Planning & Environment, NSW Ministry of Health, Safe Work NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident at Invincible operations by identifying key risks and planned actions to minimise and manage those risks; and
- Detail the training requirements for this plan, identifying persons responsible for implementing it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

This Plan has been prepared in accordance with the NSW EPA Environmental guidelines: Preparation of Pollution Incident Response Management Plans which sets out specific requirements regarding the preparing, keeping, testing and implementation of these plans.

Cullen Valley Mine has an Environmental Protection Licence (EPL 10341), which covers the premises. The EPL outlines specific conditions for environmental monitoring and reporting.

#### 1.2. Ownership and Operations

Castlereagh Coal manages Cullen Valley Mine which is located approximately 125 kilometers (km) northwest of Sydney. Cullen Valley Mine is located to the north- west of the township of Cullen Bullen. The location of the site is within the regional locality are shown on Figure 1.

Cullen Valley Mine operates in accordance with Development Consent DA-200-5-2003 and EPL 10341.

Mining operations recommenced at Cullen Valley Mine in May 2023 following an extended period of care and maintenance. This PIRMP has been developed to ensure that the activities conducted at the Cullen Valley Mine do not result in adverse impacts on human health and the environment during mining operations.

#### 1.3. Definition of a Pollution Incident

The Protection of the Environment Operations Act 1997 (POEO Act) defines a pollution incident as:

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

Section 147 of the POEO Act outlines the meaning of 'material harm to the environment' as:

"(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."

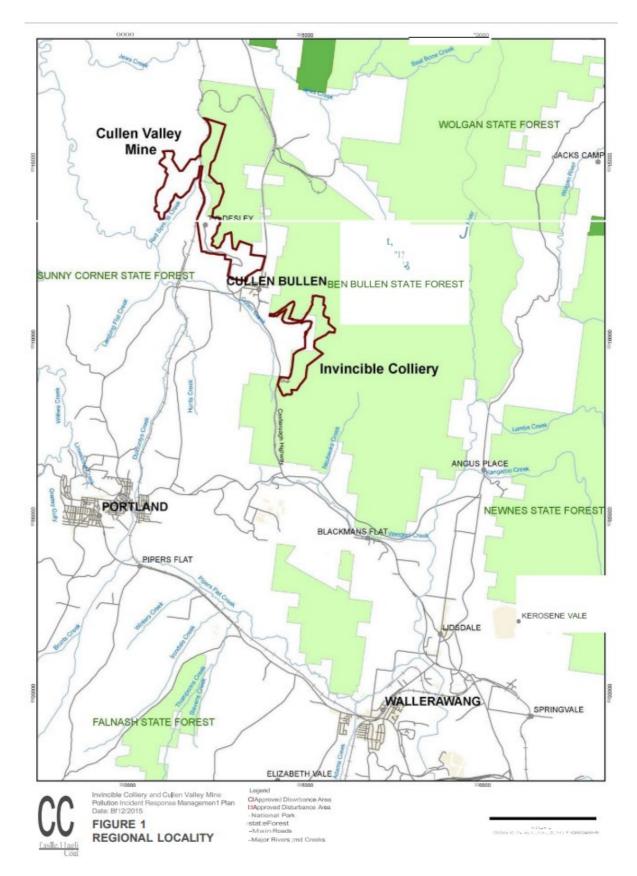


FIGURE 1: REGIONAL LOCALITY

# 1.4. Summary Of Commitments

The commitments made by Castlereagh Coal in relation to pollution incident response are summarised in **Table 1.** 

**TABLE 1: SUMMARY OF COMMITMENTS** 

No.	Commitment
1	Castlereagh Coal will report potential pollution incidents to relevant authorities immediately and notify the affected landowners and community as required.
2	Instructions outlining the key components of the PIRMP will be presented to all Castlereagh Coal staff and contractors.
3	The PIRMP will be tested on an annual basis and within one month after a reportable pollution incident.
4	All staff and contractors will receive the necessary training identified following the findings and outcomes of a pollution incident investigation.
5	The PIRMP will be made publicly available on the Castlereagh Coal website

#### 2.0. Legislative Requirements

#### 2.1. Protection of the Environment Operations Act 1997

The specific requirements for the PIRMP is set out in Part 5.7A of the POEO Act. In summary, this provision requires the following:

- The holder of an environment protection license must prepare a PIRMP that complies with Section 153A in relation to the activity to which the license relates
- A PIRMP must be in the form required and must include the information detailed in Section 153C and the regulations
- The PIRMP must be kept at the premises to which the license relates, or where the relevant activity takes place
- If a pollution incident occurs in the course of an activity and material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement the PIRMP.

#### 2.2. Protection of the Environment Operations (General) Regulation 2022

Additional requirements for PIRMP's are set out in Part 3A of the Protection of the Environment Operations (General) Regulation 2022 (POEO (G) Reg). In summary, this provision requires the following:

- The plan must be in the form required by Section 72
- The plan must include the additional matters outlined in Section 72
- The plan must be readily available to an authorised officer and at the premises and be accessible to the public as outlined in Section 74
- The PIRMP must be tested annually and within 1 month of a pollution incident in accordance with Section 75.

This PIRMP has been prepared to address legislative requirements as indicated in Section 3.1.

# 3.0. Pollution Incident Response Management Plan

#### 3.1. Structure of the PIRMP

The structure of the PIRMP in accordance with the information requirements of the POEO Act and POEO (G) Reg is outlined in **Table 2**.

TABLE 2: INFORMATION REQUIREMENTS OF THE PIRMP

Section	Requirement	PIRMP Section		
POEO Act				
	A pollution incident response management plan must be in the form required by the regulations and must include the following -			
	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:	Section 3.7		
	<ol> <li>the owners or occupiers of premises in the vicinity of the</li> </ol>			
	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	3000011 3.7		
	which the environment protection licence or the direction			
	under section 153B relates are located and any area			
Section 153C	affected, or potentially affected, by the pollution, and			
	iii. any persons or authorities required to be notified by Part			
	5.7			
	b) a detailed description of the action to be taken, immediately			
	after a pollution incident, by the holder of the relevant	Section 3.8		
	environment protection licence, or the occupier of the relevant			
	premises, to reduce or control any pollution,  c) the procedures to be followed for co-ordinating, with the			
	authorities or persons that have been notified, any action taken			
	in combating the pollution caused by the incident and, in	Section 3.8		
	particular, the persons through whom all communications are to	30000013.8		
	be made,			
	d) any other matter required by the regulations.	See below		
POEO (G) Regulation				
	For the Act, section 153C(d), the following matters must be included in a PIR	M plan -		
	a) a description of the hazards to human health or the			
	environment associated with the activity to which the licence	Section 3.2 and Appendix A		
	relates (the <i>relevant activity</i> ),			
	b) the likelihood of the hazards occurring, including details of			
	conditions or events that could, or would, increase the	Section 3.2 and Appendix A		
	likelihood,			
	c) details of the pre-emptive action to be taken to minimise or			
	prevent a risk of harm to human health or the environment	Section 3.2 and Appendix A		
	arising out of the relevant activity,			
Section 72	<li>an inventory of potential pollutants on the premises or used in carrying out the relevant activity,</li>	Section 3.3		
Section 72	e) the maximum quantity of a pollutant likely to be stored or held			
	at particular locations, including underground tanks, at or on the	Section 3.3		
	premises to which the licence relates,	30000113.3		
	f) a description of the safety equipment or other devices used to			
	minimise the risks to human health or the environment and to	Section 3.4		
	contain or control a pollution incident			
	g) the names, positions and 24-hour contact details of individuals			
	who—			
	(i) are responsible for activating the PIRM plan, and	Section 3.5		
	(ii) are authorised to notify relevant authorities under the Act,			
	section 148, and			

	(iii) are responsible for managing the response to a pollution			
	incident,  For the Act, section 153c(d), the following matters must be included in a PIRM plan -			
	h) the contact details of each relevant authority referred to in the Act, section 148,	Section 3.6		
	i) details of the mechanisms for providing early warnings and	Section 3.7 & 3.8		
	regular updates to the owners and occupiers of premises near	3ection 3.7 & 3.8		
	the premises to which the licence relates or where the			
	scheduled activity is carried on,			
	j) the arrangements for minimising the risk of harm to persons	Section 3.8		
	who are on the premises or who are present where the			
	scheduled activity is being carried on,			
	k) a detailed map, or set of maps, showing the location of the	Figures 2 & 3		
	premises to which the licence relates, the surrounding area likely			
Section 72	to be affected by a pollution incident, the location of potential			
Section 72	pollutants on the premises and the location of stormwater			
	drains on the premises,			
	l) a detailed description of how an identified risk of harm to	Section 3.8 & 3.9		
	human health will be reduced, including, as a minimum, by early			
	warnings, updates and the action to be taken during or			
	immediately after a pollution incident to reduce the risk, m) the nature and objectives of a staff training program in relation	Section 3.10		
	m) the nature and objectives of a staff training program in relation to the PIRM plan,	Section 3.10		
	n) the dates on which the PIRM plan has been tested and the name	Section 5.0		
	of the person who carried out the test,	3000011 3.0		
	o) the dates on which the PIRM plan is updated,	Section 5.0		
	p) the way in which the PIRM plan must be tested and maintained.	Section 5.0		
	A PIRM plan must be made readily available -			
	a) to an authorised officer on request, and	Section 4.0		
Section 74(1)	b) to a person who is responsible for implementing the PIRM plan			
3ection 74(1)	at the premises—			
	(i) to which the relevant licence relates, or			
2 11 -12	c) (ii) where the activity takes place.			
Section 74(2)	A PRMP plan must be made publicly available in the following way within 14			
	<ul> <li>a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan,</li> </ul>	Castlereagh Coal website and Section 4.0		
	b) if the person does not have a website—by providing a copy of	3600014.0		
	the PIRM plan, without charge, to a person who makes a written			
	request for a copy			
Section 74(4)	Personal information, within the meaning of the Privacy and Personal	Section 3.7		
	<u>Information Protection Act 1998</u> , is not required to be included in a PIRM			
	plan made available to a person other than an authorised officer.			
Section 75(1)	A PIRM plan must be tested—	Section 5.0		
	(a) routinely at least once every 12 months, and			
	(b) if a pollution incident occurred during an activity to which an			
	environment protection licence relates, which caused or threatened			
	material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring			
Section 75(2)	The test must be carried out in a way to ensure the following—	Section 5.0		
(a) the information included in the PIRM plan is accurate and up to date,		3.0		
(b) the PIRM plan is capable of being implemented in a workable and				
	effective way.			
Section 75(3)	A test carried out under subsection (1)(b) must assess the matters	Section 5.0		
	specified in subsection (2) in light of the incident			

#### 3.2. Risk Assessment

A risk assessment was conducted in accordance with Sections 72 a), (b) and (c) of the POEO (G) Reg to:

• Describe the hazards to human health and the environment

- Describe the likelihood of any such hazards occurring, and
- Outline pre-emptive control actions to be taken to minimize or prevent harm to human health or environment.

A summary of the risk assessment is presented in **Appendix A**. The risk assessment is reviewed as part of the annual review and test of the PIRMP.

#### 3.3. Inventory of Potential Pollutants

An inventory of potential pollutants stored and handled on the sites as well as the maximum quantity of each pollutant is provided in **Table 3**.

**TABLE 3: INVENTORY OF POTENTIAL POLLUTANTS** 

Pollutant	Storage Location	Maximum Quantity
Cullen Valley Mine		
None stored		

#### 3.4. Inventory of Safety Equipment

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 are outlined in **Table 4**.

**TABLE 4: INVENTORY OF SAFETY EQUIPMENT** 

Item	Storage Location	Calibration/maintenance requirements
	Mobile plant	Inspections and calibration as per manufacturer requirements
Spill kits	LV01, LV02, LV11	Monthly
Absorbent pads and booms	Spill kits	Monthly
Personal Protective Equipment	All personnel	Monthly
Material Safety Data Sheets	No chemicals stored on site	
First aid kits	All Light Vehicles	Monthly
Safety signage	Workshops	Monthly

#### 3.5. Site Contacts and Responsibilities

The contact details and responsibilities of relevant site personnel involved in managing pollution incidents are provided in **Table 5.** 

**TABLE 5: SITE PERSONNEL CONTACT DETAILS** 

Name	Position	Responsibility	24 hr Contact Details
		Responsible for implementing the PIRMP.	
		Responsible for managing the response to a pollution incident.	
Tim Haig	General Manager	Responsible for notifying relevant authorities.	
	Manager Engineering Mining	Responsible for notifying affected landowners and community.	0400 653 241
		Responsible for conducting response actions.	

#### 3.6. Regulatory Authority Contact Details

If an environmental incident presents an immediate threat to human health or property, the person conducting an activity that causes or observes a pollution incident will call '000' to notify Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service. The relevant authorities listed in **Table** 6 below will then be notified (except for Fire and Rescue NSW).

When material harm to the environment is caused or threatened and the incident does not present an immediate threat to human health or property, the relevant authorities listed in **Table 6** will be notified immediately. The Appropriate Regulatory Authority (ARA), either the Environmental Protection Authority or the local authority, will be contacted first.

**TABLE 6: REGULARITY AUTHORITY CONTACT DETAILS** 

Regulatory Authority	Key Contact	Contact Details
Environmental Protection Authority	Environment Line	131 555
Ministry of Health	Public Health Unit - Bathurst Office	Phone: (02) 6330 5880 After Hours: 0428 400 526
Safe Work NSW	Incident Notification Hotline	13 10 50
Local authority	Lithgow City Council	Phone: (02) 6354 9999
Fire and Rescue NSW	N/A	Emergency: 000 Wallerawang Fire Station: (02) 6355 1005

#### 3.7. Nearby Owners and Occupiers of Premises

Nearby receptors in the vicinity of Cullen Valley Mine include:

- Residential properties located within 500m of the lease boundaries
- The township of Cullen Bullen
- The Cullen Bullen Public School
- The Centennial Coal Ivanhoe North Coal Mine (not operating)
- The Glencore Coal Bale Bone Colliery (not operating)
- The Mount Piper Power Station (Energy Australia).

In the event of a pollution incident at the Cullen Valley Mine, the following processes for contacting affected landowners and the community will be implemented:

- When an incident occurs, Castlereagh Coal personnel will immediately contact the ARA
- Castlereagh Coal will consult with the ARA to determine if the community is to be notified of the pollution incident
- Castlereagh Coal will liaise with the ARA regarding the most relevant communication strategy (e.g. Castlereagh Coal website, media release, direct contact with those potentially impacted)
- The results and findings of the investigation pollution incident from the Cullen Valley Mine will be put on the Castlereagh Coal website when available.

Contact details of nearby receptors cannot be provided in publicly available documents under the provisions of the Privacy and Personal Information Protection Act 1998. In the event of an emergency, Castlereagh Coal will contact relevant landholders as required.

#### 3.8. Reducing Risk of Environmental Harm

An Environmental Risk Assessment has been prepared for the Cullen Valley Mine to ensure any potential environmental impacts are minimised. Appropriate environmental control measures have been identified commensurate with the potential impact of the activity. A summary of an environmental risk assessment conducted in 2017 to address the risks associated with potential environmental impacts from pollution incidents is included in **Appendix A**. The risk assessment is reviewed annually or upon a trigger-based event.

All staff and contractors will be inducted before commencing any work on site. The induction covers procedures for minimising the chance of a pollution incident occurring, managing a pollution incident and actions to be taken following a pollution incident.

All employees and contractors are informed on muster location points through the site inductions, signage and ongoing training. Key aspects of the PIRMP will be provided to all staff and contractors at induction. Training records are maintained by Castlereagh Coal at the Invincible site office.

#### 3.9. Actions to Minimise a Pollution Incident

The risk assessment contained in **Appendix A** identifies potential pollution incident scenarios at Cullen Valley Mine. For each potential pollution risk, there are a number of control measures outlined. Some general controls which are in place to reduce the likelihood of any pollution incident occurring include:

- Site Safety and Environmental Management Plans
- · Regular site inspections and maintenance
- Environmental monitoring
- Correct storage and waste management
- Training and awareness.

Castlereagh Coal will endeavour to ensure pollution incidents do not occur, however in a situation where a pollution incident is imminent and may potentially cause adverse impacts to human health or the environment, Castlereagh Coal will contact the necessary stakeholders, including employees, contractors, neighbours, and the ARA, to provide as much warning as possible.

#### **3.9.1.** Actions During a Pollution Incident

Castlereagh Coal is required under Section 148 of the POEO Act to report pollution incidents immediately to the regulatory authorities listed in **Table 6** after becoming aware of an incident.

In the event of a pollution incident, the person who has identified the incident should immediately contact the Mine Manager or Environmental Superintendent to ensure the relevant regulatory authorities are contacted. The person reporting the pollution incident should provide the following key details:

- Their name and contact details
- Location of the pollution incident or emergency
- Nature of the pollution incident or emergency
- Details of any assistance required.

The details of any emergency call or incident reporting will be recorded on the Duty Card System included in Appendix D of the Site Emergency Management Plan.

General control measures for managing a pollution incident include:

- Visually assess the situation (nature of substance; volume of substance, potential risks to human health and environment)
- Notify the Mining Engineering Manager immediately on becoming aware of a pollution incident
- Immediately notify the regulatory authorities listed in Table 6 if material harm to the environment is caused or threatened

- Undertake preliminary incident response to contain polluting substance and prevent further emissions, if safe to do so
- If safe and possible to do so, undertake clean-up measures to prevent further impacts from the pollution incident
- Take direction from regulatory authorities as required
- If required seek assistance from specialist consultants/contractors.

#### **3.9.2.** Actions Following a Pollution Incident

If a pollution incident occurs, there will be a detailed incident investigation and a report will be sent to all relevant regulatory authorities. An Incident Report Form will be completed. Within a month following a pollution incident, Castlereagh Coal will review and test the PIRMP. Castlereagh Coal will continue to liaise with the relevant regulatory authorities to reduce the likelihood of the pollution incident occurring.

All staff and contractors will receive the necessary training identified following the incident investigation and outcomes of the investigation. The key outcomes of the incident investigation will be communicated to all staff and contractors through toolbox talks and/or staff meetings.

#### **3.9.3.** Staff Training

The requirements of the PIRMP will be outlined in the site induction for all new employees and contractors. A toolbox talk outlining the key components on the PIRMP will be presented to all Castlereagh Coal staff and contractors. The objective of training will be to ensure all staff and contractors are aware of the key steps to manage a pollution incident. If a pollution incident occurs, refresher training will be delivered to staff and contractors.

### **4.0** Availability of PIRMP

A copy of this PIRMP (electronic and hard copy) is kept at Invincible Colliery until operations begin at Cullen Valley Mine. Castlereagh Coal will provide a copy to regulatory authorities upon request. The PIRMP is publicly available on the Castlereagh Coal website Castlereagh Coal – Information on Castlereagh Coal (ccoal.com.au)

# **5.0** Testing and Review of PIRMP

#### **5.1.** PIRMP Review

This PIRMP will be revised on an annual basis to ensure that the information included in the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner. The plan will also be tested within one month of any pollution incident. The revision status of the PIRMP since 2016 is included in **Table 7** below. It should be noted that the PIRMP was initially developed as a combined document for both Invincible Colliery and the Cullen Valley Mine. The document was separated into a PIRMP for each site in 2021 as mining at the Cullen Valley Mine and Invincible Colliery are separate sites with different risks.

**TABLE 7: REVISION STATUS** 

Revision No.	Date	Description	Details of update
1.0	5/02/16	Development of PIRMP	Development of PIRMP for Cullen Valley Mine
2.0	13/12/17	Review of PIRMP	Update to PIRMP to update site contacts, complete annual review of PIRMP as required by legislation and include PIRMP test documents as <b>Appendix B</b> .
3.0	20/12/18	Review of PIRMP	Update to the PIRMP to include general review of site contact and also to include PIRMP simulation, included in <b>Appendix B</b>
4.0	20/12/19	Review of PIRMP	Review of general PIRMP content and inclusion of the PIRMP test in <b>Appendix B</b> .
5.0	2/12/20	Review of PIRMP	Review of general PIRMP content, update of regulatory authority contact details and inclusion of the PIRMP test in <b>Appendix B</b> .
6.0	13/12/21	Review of PIRMP	Review of PIRMP; separate combined Cullen Valley Mine and Invincible Colliery PIRMP into separate documents.
7.0	August 2023	Review of PIRMP	Conduct a review and update of Cullen Valley Mine PIRMP following water release complaint / incident 12 June 2022 and EPA written response dated July 2022.
8.0	December 2023	Review of PIRMP	Conducted a simulation involved an engine oil spill incident on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.

9.0	19/12/24	Review of PIRMP	A review and update of the PIRMP following the PIRMP test on 19 December 2024. Minor changes were made and the adding of appendix detail the PIRMP activation forms.	
10.0	25/09/25	Review of PIRMP	A review and revision of legislation and the risk assessment along with minor changes to inventory and wording within the document.	

#### **5.2.** PIRMP Review Requirements

In accordance with legislative requirements, the PIRMP must be tested annually and within one month of a pollution incident in accordance with Section 98E. An overview of the PIRMP tests which have been undertaken previously in addition to the implementation of the PIRMP procedures in December 2023 and subsequent review and simulation are detailed in Table 8.

There have been no pollution incidents at the Cullen Valley Mine during the stand down period to date. However, the Castlereagh Coal PIRMP has been tested as required by a desktop simulation of a pollution incident and initiation of a response. The incident and response are reported in this PIRMP Test Report.

**TABLE 8: PIRMP TESTS** 

Date	Description	Outcome of assessment	
25 November 2016	Light vehicle incident at CVM	There were no deficiencies in procedures identified and no further review of the PIRMP was required	
13 December 2017	Excavator fuel line breakage at Cullen Valley Mine during earthworks on erosion control structures	was required. Site personnel and contractors	
12 December 2018	Spillage of oil from an excavator at the Invincible Pit Top	There were no deficiencies in procedures identified and no further review of the PIRMP was required in addition to the annual review of the PIRMP which was also undertaken in December 2018. A further review of the PIRMP is proposed to be undertaken prior to the commencement of mining operations at Invincible Colliery.	

Date	Description	Outcome of assessment
27 November 2019	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulators authorities was also undertaken during the review with regulatory authority numbers in the PIRMP confirmed as being correct.
2 December 2020	Bushfire at Invincible Colliery.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulatory authorities was also undertaken during the review with regulatory authority numbers in the PIRMP updated, including Safework NSW and Wallerawang Fire Station.
13 December 2021	Oil Spill due to equipment failure - Cullen Valley Mine Haul Road	There were no deficiencies in procedures identified and no further review of the PIRMP was required. Site personnel and contractors demonstrated a good understanding of PIRMP requirements.
August 2022	Discharge from Dam 3 (Licensed Discharge Point 1) following a pump valve failure — potential EPL Licence threshold exceedances	Post incident the Company reviewed its application of the PIRMP procedures and subsequent incident investigation and response to the NSW EPA. Personnel were found to have demonstrated an excellent understanding of PIRMP requirements and the application of related tools.
December 2023	The simulation involved an engine oil spill incident and was conducted on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulators authorities was also undertaken during the review with regulatory authority numbers in the PIRMP confirmed as being correct.
19 December 2024	Simulation of Service Truck Rollover	There were no deficiencies in procedures identified and a minor revision of the PIRMP was required. Personnel demonstrated a good understanding of PIRMP requirements. Personnel demonstrated a good understanding of PIRMP requirements including reporting of incident, site communications systems and general pollution incident response. There were

Date	Description	Outcome of assessment
		some improvement actions assigned for continual improvement.
19 September 2025	Water Cart Oil Spill	There were no deficiencies in procedures identified and a minor revision of the PIRMP was required. Personnel demonstrated a good understanding of PIRMP requirements including reporting of the incident, site communications systems and general pollution incident response. There were some improvement actions assigned to various personnel for continual improvement.

#### **APPENDIX A**

**Pollution Incident Risk Assessment** 

Cullen Valley Mine Colliery Risk Assessment – 2025 (Review)					
Issue	Potential Impact	Control Measures	Consequence	Likelihood	Risk Rating
Dirty water runoff from disturbed areas within site and unplanned discharges from licensed discharge points	Discharge of water offsite not in accordance with license conditions	Regular inspections of dam water levels. Transfers of water within the sediment dam systems where necessary.	Minor	Possible	Med
Hazardous substances spillage/leakage	Hazardous substances enter downstream waterways / land	Regular maintenance of plant and equipment and attendance to reports of leaks.  Regular inspections of spill kits.  Training/awareness of spill kit locations and spill response procedures.	Minor	Unlikely	Low
Sewage system spillage/leakage	Sewage effluent enters downstream waterways	No sewage on site	Minor	Unlikely	Low
Incorrect storage and handling of hazardous substances	Personal injury or ill- health on workers or community	PPE available and worn when handling hazardous substances.	Minor	Unlikely	Low

#### **APPENDIX B**

Forms for PIRMP Activation



# CULLEN VALLEY MINE PIRMP Form

Final

December 2024

#### **Document Status**

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
FINAL	Will Olson	19 <sup>th</sup> December 2024	Will Olson	December 2023

Information Item	Reponses to be provided to Appropriate Regulatory Bodies (EVENT FACTS)	Complete
Name of person making report to ARA		
Role of person making the report		
Name of person/s who witnessed or reported the event		
Location of the event? i.e. on the mine premises, State Conservation Area?		
What is the pollution incident?		
What was released?		
Where was it released?		
What volume was released?		
When was it released?	Time: to Date:	
How long was the release?	Time: to Date:	
Is it still being released?		
Is the chemical known to be toxic? (refer to SDS)		
Any known water quality results applicable to pollution incident?		
How has the source been controlled?		

Information Item	Reponses to be provided to Appropriate Regulatory Bodies (EVENT FACTS)	Complete
How has the release been contained?		
How is the release being cleaned up?		
Is this material registered to site? E.g. SDS		
What immediate actions taken to control the site?		