

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Document Control					
Edition	Revision	Author	Comment	Date	Authorised by
					Jenna Marret & Andrew
1	Rev 0	ESR	Last review date on record	07/01/2014	Raal
1	Rev 1	Samantha Lloyd	Change of Format	10/06/2020	Jonathon Thompson
			Update of hazardous		
			chemical table and		
1	Rev 2	Laura Barnes	contacts details	22/06/2021	Michael Priest
			Update of hazardous		
			chemical table, maps and	09/06/2022	
1	Rev 3	Laura Barnes	contact details		Diana Barnes
			Update maps, contact		
1	Rev 4	Laura Barnes	details and appendix 1.	03/04/2023	Diana Barnes
			PRIMP triggered.		
1	Rev 5	Laura Newton	Reviewed, no updates	05/07/2023	Diana Barnes



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1.0 Quick Reference Guide

Please refer Appendix 1 for quick reference guide for reportable incidents.

2.0 Introduction

Peak Gold Mines is an underground metalliferous mine owned by Aurelia Metals Limited (Aurelia). The mine has two respective sites (New Cobar Complex and Peak Complex) in which this plan applies. The New Cobar Complex is located within CML 6, and Peak Complex is located within CML 8, approximately 3km and 10km respectively, southeast of Cobar in far west New South Wales (NSW) (Figure 1).

This Pollution Incident Response Management Plan (PIRMP) has been prepared in response to amendments to the Protection of the Environment Legislation Amendments 2011 as set out in Part 5.7A of the Protection of the Environment Act 1997 (POEO Act) in accordance with the Environmental Planning and Assessment Act 1979 (EPA Act). The purpose of this PIRMP is to detail:

- SPECIFIC measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire;
- INVENTORY of potential pollutants on site;
- MINIMUM safety equipment requirements;
- COMMUNICATION with the community;
- MINIMISING harm to persons;
- TRAINING and awareness of personnel; and
- REVIEW of the PIRMP through desktop trials / mock incidents.

The Company has numerous documents in place that complement the PIRMP and will also assist with pollution management. These include:

- Emergency Management Plan;
- Chemical Spill Form;
- Cyanide Response Protocol;
- Cyanide Spill Form;
- Dam Breach or Failure Form;
- Crisis Management Procedure;
- Waste Management Plan;
- Biodiversity and Land Management Plan;
- TSF Management Plan;
- Air Quality Management Plan;
- Waste Rock Management Plan; and
- Water Management Plan.



Environmental Management

This section describes the legal requirements, objectives and outcomes, personnel roles and responsibilities and the necessary training and awareness required to ensure the management and prevention of pollution incidents.

2.1 Legal and other requirements

As defined in the POEO Act, a 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 in circumstances involving only the emission of any noise".

A pollution incident is required to be reported if there is a risk of 'material harm to the environment', which is defined in Part 5.7 of the POEO Act and replicated in **Table 1**.

Duty to Notify Pollution Incidents			
147 Meaning of	(1) For the purposes of this Part:		
material harm to	(a) harm to the environment is material if:		
the environment	(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.		
148 Pollution	(1) Kinds of incidents to be notified:		
incidents causing	This Part applies where a pollution incident occurs in the course of an activity so that material		
or threatening	harm to the environment is caused or threatened.		
material harm to	(2) Duty of person carrying on activity to notify:		
be notified	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.		
	(3A) Duty of employee engaged in carrying on activity to notify:		
	A person engaged as an employee in carrying on an activity 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.		

Table 1: Requirements as per Part 5.7 of the POEO Act



	(3B) Duty of employer to notify:
	Without limiting subsection (2), an employer who is notified of an incident under subsection
	(3A) or who otherwise becomes aware of a pollution incident which is related to an activity of
	the employer, must, immediately after being notified or otherwise becoming aware of the
incident, notify each relevant authority of the incident and all relevant information	
(4) Duty of occupier of premises to notify:	
	The occupier of the premises on which the incident occurs must, immediately after the
	occupier becomes aware of the incident, notify each relevant authority of the incident and all
	relevant information about it.
	(5) Duty on employer and occupier to ensure notification:
	An employer or an occupier of premises 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 the employer or occupier will,
	immediately, notify the employer or occupier of the incident and all relevant information
	about it.
	(6) Extension of duty to agents and principals
	This section extends to a person engaged in carrying on an activity as an agent for another. In
	that case, a reference in this section to an employee extends to such an agent and a
	reference to an employer extends to the principal.
(7) Odour not required to be reported	
	This section does not extend to a pollution incident involving only the emission of an odour.
	(8) Meaning of "relevant authority"
	In this section: relevant authority means any of the following:
	(a) the appropriate regulatory authority;
	(b) if the EPA is not the appropriate regulatory authority—the EPA;
	(c) if the EPA is the appropriate regulatory authority—the local authority for the area in
	which the pollution incident occurs;
	(d) the Ministry of Health;
	(e) the SafeWork NSW; and
	(f) Fire and Rescue NSW.
149 Manner and	(1) If the regulations prescribe the manner or form of notifying pollution incidents under
form of	section 148, the notification is to conform to the requirements of the regulations.
notification	(2) Without limiting subsection (1), the regulations:
	(a) may require that verbal notification be followed by written notification; and
	(b) may provide that notification to a designated person or authority is taken to be
	notification to the relevant person or authority under section 148.



150 Relevant	(1) The relevant information about a pollution incident required under section 148 consists of		
information to be	the following:		
given	(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; and		
	(f) other information prescribed by the regulations.		
	(2) The information required by this section is the information known to the person notifying		
	the incident when the notification is required to be given.		
	(3) If the information required to be included in a notice of a pollution incident by subsection		
	(1) (c), (d) or (e) is not known to that person when the initial notification is made but		
	becomes known afterwards, that information must be notified in accordance with section		
	148 immediately after it becomes known.		
151 Incidents not	(1) A person is not required to notify a pollution incident under section 148 if the person is		
required to be	aware that the incident has already come to the notice of each person or authority required		
reported	to be notified.		
	(2) A person is not required to notify a pollution incident under section 148 if the incident is		
	an ordinary result of action required to be taken to comply with an environment protection		
	licence, an environment protection notice or other requirement of or made under this Act.		
151A EPA may	(1) This section applies to the occupier of premises where a pollution incident has occurred in		
require other	the course of an activity so that material harm to the environment is caused or threatened.		
notification of	(2) The EPA may direct a person to whom this section applies to notify such other persons of		
pollution incidents	the incident as the EPA requires.		
	(3) The direction is not required to be given in writing.		
	(4) The direction may specify the manner or form of notifying the pollution incident and the		
	information that must be provided.		
	(5) The direction may require that an initial verbal notification be followed by written		
	notification.		
	(6) A person must not fail to comply with a direction given under this section.		
	(7) This section does not extend to a pollution incident involving only the emission of an		
	odour.		
	(8) If a direction under this section is given to a person who is carrying out an activity, is		
	engaged as an employee in carrying out an activity, or is the employer of such a person, the		
	obligations under this section are in addition to, and not in derogation of, the obligations		
	under section 148 (except as provided by section 151 (1)).		
152 Offence	A person who contravenes this Part is guilty of an offence. Maximum penalty:		



	(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.	
153 Incriminating	(1) A person is required to notify a pollution incident under this Part even though to do so	
information	might incriminate the person or make the person liable to a penalty.	
	(2) Any notification given by a person under this Part is not admissible in evidence against the	
	person for an offence or for the imposition of a penalty.	
	(3) Subsection (2) does not apply to evidence obtained following or as a result of the	
	notification.	

A requirement for holders of an Environment Protection License (EPL) is to prepare, keep, test and implement a PIRMP. The PIRMP must comply with the requirements listed in (Table 2) (Part 5.7A of the POEO Act).

This Management Plan will be made publicly available within 14 days of finalisation.

Duty to Prepare and Implemen	t Pollution Incident Response Management Plans
153A Duty of licence holder to prepare pollution incident response management plan	The holder of an Environmental 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. Maximum penalty: (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.
153B EPA may direct other persons to prepare pollution incident response management plan	(1) The EPA may, in accordance with the regulations, require the occupier of premises at which industry is carried out to prepare a Pollution Incident Response Management Plan that complies with this Part in relation to activities at the premises.
	 (2) A person must not fail to comply with such a requirement. Maximum penalty: (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.
	 (3) The regulations may make provision for or with respect to: (a) the class or classes of premises, or industries carried out at premises, that may be the subject of a requirement to prepare a Pollution Incident Response Management Plan; and (b) the circumstances in which some or all premises within those classes may be the subject of a requirement to prepare a Pollution Incident Response
153C Information to be included in plan	A Pollution Incident Response Management Plan must be in the form required by the regulations and must include the following:

Table 2 Requirements as per Part 5.7A of the POEO Act



	(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.
	(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
	accurate of the relevant premises to reduce or control any pollution:
	(a) the presedures to be followed for an ordinating with the authorities or persons
	(c) the procedures to be followed for co-ordinating, with the authorities of persons
	that have been notified, any action taken in compating the pollution caused by the
	incident and the persons through whom all communications are to be made; and
	(d) any other matter required by the regulations.
153D Keeping of plan	A person who is required to prepare a Pollution Incident Response Management
	Plan under this Part must ensure that it is kept at the premises to which the
	relevant Environment Protection Licence relates, or where the relevant activity
	takes place, and is made available in accordance with the regulations. Maximum
	penalty:
	(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.
153E Testing of plan	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.
	Maximum nenalty:
	(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
	(h) in the case of an individual $-$ \$250,000 for each any the orientee continues, of
	further papalty of \$60,000 for each day the offence continues
1525 Implementation of plan	If a reliable incident accurs in the course of an activity so that material harm to
153F Implementation of plan	If a pollution incident occurs in the course of an activity so that material name to
	the environment (within the meaning of section 147) 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 this Part.
	Maximum penalty:
	(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.



2.2 **Objectives and Outcomes**

Table 3 lists the objective and outcomes for pollution incident management on the site.

Table 3: Objectives and Outcomes

Objective	Outcome
Make sure comprehensive and timely communication about a pollution incident is carried out with staff at the premises, the Environmental Protection Authority and other relevant authorities and any community	Development and implementation of a communication plan and correct execution of communication plan
members which may be impacted by the incident	
Minimise and control the risks of a pollution incident at	Develop a site-based risk / hazard assessment and
the site by identifying risks and develop actions to	mitigation measures
minimise and manage the risks	
Make sure the Pollution Incident Response	A comprehensive and up to date Pollution Incident
Management Plan is properly implemented and	Response Management Plan
identifies personnel responsible for implementing it,	
and ensuring that the plan is regularly tested for	
accuracy, currency and suitability	

2.3 Roles and Responsibilities

Table 4 lists the roles and responsibilities for the PIRMP.

Table 4: Roles and Responsibilities

Position	Accountable Task
General Manager	 Ensure the resources are available for the implementation of this Pollution Incident Response Management Plan; and Accountable for the overall environmental performance of the Project, including the outcomes of this Pollution Incident Response Management Plan.
Environment Advisor	 Ensure the implementation of this PIRMP; Ensure the onsite induction includes environmental awareness training; and Ensure managers and superintendents are provided with sound environmental advice to effectively manage their areas of responsibility.
All personnel	 Ensure adequate understanding of chemical storage, spill action plan, appropriate waste disposal and prevention of fires; Ensure sound knowledge of site emergency evacuation procedure; Report all pollution incidents to their supervisors and the Environment Advisor; and Seek environmental advice as required.

2.4 Competence and Awareness Training

All site personnel will conduct the site induction program before entering site.

The Emergency Response Team will be trained in handling hazardous material products and emergency response. Specific procedures for training employees in environmental safety and health are included in the Emergency Management Plan. This management plan is available to all site personnel.



3.0 Implementation of Pollution Management

3.1 Site Information

3.1.1 Site Details

The New Cobar Complex (located in CML 6) and Peak Complex (located in CML 8) are located on Hillston Road, Cobar, NSW. (figure 1).



3.1.2 New Cobar Complex

New Cobar Complex is situated in a rural area, bounded by private property and Crown Land (Figure 1).



Figure 1 The New Cobar Complex



3.1.3 Peak Complex

Peak Complex is situated in a rural area, bounded by private property and Crown Land (Figure 2).



Figure 2 Peak Mine Complex

3.1.4 Surrounding Sensitive Environments

No endangered ecological communities or populations were recorded or are predicted to occur within the surrounds of the complexes. There are no continual flowing creeks in or within the surrounds of the complexes.

3.2 Description and Likelihood of Hazards (Risk Analysis)

The major hazards which have been identified for the complexes are listed in (**Table 5**). The likelihood of these potential hazards occurring has been captured using the methodology defined in **Table 6** Table 6. Major pollution incidents have been based on worst case scenario, where all hard and soft management controls fail simultaneously. The likelihood of these events occurring and impacting on neighbouring properties or the local community is very rare however, the consequence would be major to catastrophic.



Table 5 Hazards and their likelihood

Locality	Hazard	Volume	Likelihood	Containment	Risk/Action
Peak Complex Explosive Magazine	ANFO	50KL	Rare	Bunded explosive magazine.	Risk: Potential for fire and explosion. Bunding/contained catchment will prevent liquid from leaving site. Action: Notify neighbouring community if a fire is present or if potential for explosion.
Peak Complex	Nitric Acid 70%	0.05KL	Rare	Covered Storage Area	Risk: If catastrophic failure of liquid chemicals occurred in the reagent storage area, chemicals
Reagents	Hydrated Lime	20KL			could potentially drain into the Process
Storage	Copper Sulphate Zinc Sulphate	30 Tonne 30 Tonne			Action: In case of fire or vaporisation of the
	Sodium Metabisulphate	30 Tonne			(Including Cobar Township) to be notified of the potential hazard. Sump is not to be pumped out into the RWD until chemical have been suitably
Peak Complex	Sodium Hydroxide	22KL	Rare	Concrete Bunded	neutralised or rendered harmless.
Mill	Hydrochloric	20KL			
Peak Complex Cyanide Bulk Tank – Reagent Storage	Cyanide Solution N.O.S	165KL Tank ~30KL Truck	Unlikely	Above ground cyanide tank. Tank is concrete bunded. Cyanide delivery bund at location. Cyanide delivery truck.	
Peak Complex Mill	Sodium Isobutyl Xanthate	4KL	Rare	IBC's	Risk: Supports combustion and may cause fire/explosion and toxic gas. Action: In case of fire/ explosion or vaporisation, area is to be evacuated. Notify neighbouring community if a fire is present or if potential for explosion. Only held onsite when required.
Peak Complex Mill	Oxygen Tank	45KL	Rare	Fenced Cylinder	Risk: Supports combustion and may cause fire/explosion. Action: In case of fire, area is to be evacuated. Notify neighbouring community if a fire is present or if potential for explosion.
Peak Complex Mill	Liquefied Petroleum Gas	15KL	Rare	Above Ground Tanks	Risk: Highly flammable substance. Action: If cylinder presents leaks, area is to be evacuated. In case of fire/explosion or vaporisation, notify neighbouring community.
	Diesel	85KL	Rare		



Peak Complex Fuel Bay	Waste Oil	15KL		Above ground tank with concrete bund.	Risk: Failure of bund or leakage during fuel/oil transfer could result in fuel/oil leaking into the Recycled Water Dam. No risk of release offsite in liquid form. Action: Stop water transfer from the RWD to all areas onsite until all hydrocarbons are removed. In case of fire, notify neighbouring community of the incident and smoke potential depending on wind direction.
Peak Complex Recycled Water Dam (RWD)	Contaminated Water	50400 KL	Rare	Earthen dam with rock lined spillway into the RWD Overflow dam	Risk: If dam wall became compromised water would overflow into the South Stock farm dam and potentially drain off site through natural drainage lines.
Peak Complex RWD Overflow	Contaminated Water	25900 KL	Rare	Earthen dam	
Locality	Hazard	Volume	Likelihood	Containment	Risk/Action
Peak Complex Netted Dam	Process Water	1900KL	Possible	Lined Dam, designed to overflow into RWD.	Risk: Cyanide levels in the dam normally range from 80mg/l to 200mg/l. Action: If Netted dam overflows, stop water transfer from the RWD to all areas onsite until detox has occurred.
Peak Complex TSF Decant Dam	Process Water	223,600KL	Unlikely	Earthen dam with wall. Capacity to return water to the Netted Dam. Designed to capture overflow from the TSF up to a 1:100y 72h rainfall event.	Risk: Water will potentially contain elevated levels of cyanide. If catastrophic failure would occur water would flow to the southwest to main drainage lines. The closest permanent residence is ~4km downstream. Action: Detox should be applied to the water. Notify neighbouring community of the incident.
Peak Complex Tailing Storage Facility (TSF)	Process water	223,600KL	Rare	Central discharged tailings dam. No ponding of water on dam. Southern and northern end of the facility have walls constructed of earth and tailings of which are rock armoured.	 Risk: Key risk is liquefaction, likely caused by excessive, long periods of rainfall and subsequent earthquake activity. Issues arising from the identified pressure may lead to wall failure. Action: Notify neighbouring community of the incident. Notify Dam Engineer. For additional information on the TSF refer to the TSF Operations and Maintenance Manual.
New Cobar Fuel Bay - surface workshop	Diesel	55KL	Rare	Above ground tank with concrete bund.	Risk: Failure of tank and bunk or leakage during fuel transfer may result in fuel leaking into NC4 dam. No risk of release off site in liquid form. Action: Stop water transfer from NC4 to the sediment cells until hydrocarbons are removed from the dam. In case of fire neighbouring community are to be notified of incident and smoke potential depending on wind direction.



New Cobar Explosive Magazine	ANFO	50KL	Rare	Bunded explosive magazine.	Risk: Potential for fire and explosion. Bunding/contained catchment will prevent liquid from leaving site. Action: If fire or explosive potential exists neighbouring community are to be notified of incident and smoke potential depending on wind direction.
New Cobar Young Australia Complex	Contaminated Water	131,300KL	Rare	Catchment Dam below Chesney historic workings.	Risk: In the event of dam failure, public access roads on Crown Land could be damaged or cut- off. Small potential for Kidman Way Highway to be impacted. Action: Cobar Shire Council, Crown Lands and neighbouring community to be notified.
New Cobar Spain's Dam	Contaminated Water	59,700 KL	Unlikely	Catchment Dam with Earthen Wall.	Risk: In the event of dam failure, public access roads on Crown Land could be damaged or cut- off. Small potential for Kidman Way Highway to be impacted. Action: Cobar Shire Council, Crown Lands and neighbouring community to be notified.

Table 6 Methodology used to determine likelihood

Occurrence (Likelihood)	Description
Rare	Will occur every +20 years. <5% likelihood.
Unlikely	Will occur once every 5-20 years. 5% to 25% likelihood.
Possible	Will probably occur at least once 2-5 years. 25% to 75% likelihood.
Likely	Will occur multiple times in a year. 75% to 95% likelihood.
Almost Certain	Will occur at least once or multiple times each year. >95% likelihood.



3.3 Inventory of Pollutants

3.3.1 Peak Site Hazardous Chemicals

Peak Site hazardous chemicals are detailed in Table 7. The storage location of each substance has been identified in Figure 4. All chemicals are accompanied by their Safety Data Sheets (SDS) as required by work, health and safety regulations.

Table 7 Peak Site Dangerous Goods, Hazardous Substances, and Chemical Reagents

Hazardous Substance	Storage ID	Storage Type	Location	X Coordinate	Y Coordinate	Typical Quantity (L)	UN No.
Diesel	DGL 20	Above Ground Tank	Peak (Fuel Bay)	393,428	6,507,101	85KL	3082
Waste Oil	DGL 4	Above Ground Tank	Peak (Fuel Bay)	393,421	6,507,098	15KL	None Allocated
Sodium Cyanide	DGL 19	Above Ground Tank	Peak (Mill)	393,385	6,507,149	165KL	3414
Hydrochloric Acid	DGL 8	Above Ground Tank	Peak (Mill)	393,427	6,507,208	20KL	1789
Caustic Soda	DGL 7	Above Ground Tank	Peak (Mill)	393,420	6,507,206	20KL	1719
Copper Sulphate	DGL 1	1 Tonne Bulk Bags	Peak (Mill)	393,262	6,507,148	30 Bags	3077
Liquefied Petroleum Gas	DGL 6	Above Ground Tank	Peak (Mill)	393,411	6,507,250	15KL	1075
Zinc Sulphate	DGL 1	1 Tonne Bulk Bags	Peak (Mill)	393,310	6,507,132	30 Bags	3077
Oxygen	DGL 18	Above Ground Tank	Peak (Mill)	393,432	6,507,167	45KL	1073
Hydrated Lime	DGL 5	Above Ground Tank	Peak (Mill)	393,332	6,507,172	20KL	None Allocated
Nitric Acid 70%	DGL 22	20L Container	Peak (Mill)	393,337	6,507,153	0.05KL	2031
Ammonium Nitrate	DGL23	Above Ground Tank	Peak (magazine pad)	393,103	6,507,845	50KL	2067
Sodium Metabisulphate	DGL 3	Above ground tank	Peak (Mill)	393,310	6,507,132	10KL	1759
Mixed solution	DGL 2	1 tonne bulk bags	Peak (Mill)	393,313	6,507,166	30 bags	2693



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Figure 3 Peak site Plan of hazardous substances



3.3.2 **New Cobar Hazardous Chemicals**

New Cobar hazardous chemicals are detailed in (**Table 7**). The storage location of each substance has been identified in **Figure 5**. All chemicals are accompanied by their Safety Data Sheets (SDS) as required by work, health and safety regulations.

Table 7 New Cobar Site Dangerous Goods, Hazardous Substances, and Chemical Reagents

Hazardous Substance	Storage ID	Storage Type	Location	X Coordinate	Y Coordinate	Typical Quantity (L)	UN No.
Diesel	DGL 24	Above Ground Tank	New Cobar (workshop)	391,509	6,512,104	55KL	3082
Ammonium Nitrate	DGL25	Above Ground Tank	New Cobar (magazine pad)	391,952	6,511,727	50KL	2067



Figure 5 New Cobar site plan of hazardous substances



4.0 **Pre-Emptive and Control Measures**

4.1 Health and Safety

Before responding to a pollution incident, health and safety risks are to be identified and assessed by suitably qualified personnel. Any relevant risk assessment that has been developed shall be followed in the event of an emergency. If the complexes are required to be evacuated as a result of a pollution event, relevant site evacuation procedures must be followed. The Peak Complex muster point is the Southern Carpark. The New Cobar Complex muster point in the administrative building carpark.

All health and safety issues will be managed by the Work, Health and Safety Advisor.

4.2 Spill Response

Figure 4 details the Peak Complex plan of hazardous substances, **Figure 5** details the New Cobar Complex plan of hazardous substances. The spill action plan for both sites is outlined in **Figure 6**.





First Person Response

Assess spill hazards and risks, if safe to do so, stop the spill if possible. Refer to MSDS and wear appropriate PPE

Shut off valves, pump tanks, plug inlets/outlets

Dike or redirect flows to a holding area Absorb with sand or other material

Excavate contaminated soils

Clean out sediment basins/bunds/oil traps

If area is unsafe, evacuate the area by following the Evacuation Plan. If anyone is injured call for assistance IMMEDIATELY

Notify the Environment Advisor, General Manager and other necessary management (Work, Health and Safety Advisor in case of evacuation or personal injury)

Environment Advisor

Ensure the spill is being managed If necessary, call for external assistance If required, notify external agencies Environmental Protection Authority Department of Planning, Industry and Environment Compliance and Resource Regulator

If required, take samples for analysis Take photos

Document spill details, conduct incident review Organise the removal of all recovered or contaminated material

If mining activities ceased due to the incident, determine if the mining operations can continue in a safe manner in consultation with Peak management and/or external government agencies

If necessary, provide written report to external agencies

Review Pollution Incident Response Management Plan

Replenish spill clan up material, if it has been deplenished through clean-up

Work, Health and Safety Advisor

Attend to any personnel safety incidents and organise further action if required (e.g. hospital)

Ensure all site personnel are accounted for in the case of an evacuation.

Figure 6 Spill Action Response Plan



4.3 Pollution Control Measures

Preventative and mitigation controls established at the site are detailed in the sections below.

4.3.1 Fuel

- All diesel fuel is stored in self bunded tanks;
- A compacted refuelling area is located adjacent to fuel tanks;
- All fuel storage is bunded to ensure 110% of the largest liquids stored can be captured within the bund;
- Spill kits are located at all fuel storages; and
- SDS are located either at the fuel storage or in the Emergency Services Offices.

4.3.2 Hazardous Chemical Storage of liquids

- Bund and cover all liquid storage areas ensure 110% of the largest liquids stored can be captured within the bund;
- Ensure chemicals have appropriate transport, handling, storage and application procedures to prevent chemical spillage;
- Store minimum volume of chemicals onsite as per requirement for the ongoing operation of the Mine;
- Personnel who use chemicals would be provided with the appropriate training in handling techniques;
- Ensure records are kept of water quality checks, discharges and any remedial actions taken;
- Where possible, install containment measures such as sandbags, booms, earth bunds or cut drains to capture and retain spilled material and prevent it from leaving site, entering watercourse or impacting on vegetation stands;
- The Emergency Response Team will be trained in clean-up of chemical / hazardous material spills.

4.3.3 Fire

Fires may be ignited as a result of truck accidents during transport of chemicals, vehicle collisions, equipment failure, use of electrical equipment, overhead power lines and grass fires in adverse weather conditions (hot and dry). Specific emergency response plans are detailed in the Emergency Management Plan. The below measures would be taken to minimise the risk of fires:

- Firefighting equipment is available on site to facilitate an immediate response to a fire incident and help ensure the safety of public and property including fire extinguishers in all vehicles;
- Equip personnel and vehicles involved in such activities with firefighting and safety gear;
- Construct fire breaks and tracks along the site boundary;
- Conducting regular reviews and inspections of firefighting equipment to ensure it is operational; and
- Site Mines Rescue Team will be trained in how to combat fires.





5.0 Emergency Response

5.1 Communication Plan

This section describes the communication plan to be undertaken with the relevant agencies (**table 9**) and community (**table 11**) in the event of a notifiable pollution incident that has the potential to cause harm to people or the environment.

5.1.1 Government Agencies

Table 8Error! Reference source not found. presents the agencies to be contacted in order and what stage in the event of a notifiable pollution incident. The Incident Notification Record Sheet (**Appendices 1**) is to be completed when notifying relevant agencies on the details of externally reportable incidents.

Trigger	Agency	Contact Details		
An incident that presents an immediate threat to human health or property.	Fire and Rescue NSW NSW Police NSW Ambulance Service	Call 000		
An incident that:does not require an initial	Environment Protection Authority	Environment Line 131 555		
 combat agency; or once the 000 call has been made. Notify the relevant authorities in the following order. 	NSW Health	Cobar District Hospital Phone (02) 6879 9500 Dubbo Base Hospital Phone (02) 6809 6809		
	SafeWork NSW	Phone 13 10 50		
	Cobar Shire Council	Business Hours (02) 6836 5888 After Hours 0419 281 115 (Peter Vlatko – General Manager)		
Agencies to be contacted	Agency	Contact Details		
depending on type of pollution incident:	Department of Planning, Industry and Environment – Resources Regulator	nswresourcesregulator@service- now.com 7-day report, under POEO act		
	Dams Safety NSW	(02) 9842 8073 or 0403 681 645		
	Natural Resources Access Regulator	1800 633 362		
	Crown Lands Division	(02) 6836 3018		
Note: Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for				

Table 8 Government Agency Contacts

Note: Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW.

5.1.2 **Community**

Table 9 presents the residents of neighbouring properties that are to be contacted in the event of an incident.

Table 9 Residents - Neighbouring Community Properties

Neighbouring Property Owners					
Neighbour	Nixon's Tank				
Langton's Lease	Merrises				
Mafeesh Station & Barrowvale	Steve Roberts block				
Dellavale Homestead					



5.1.3 Phases, Roles and Responsibilities

This section identifies the phases and responsibilities for the site personnel for the implementation of the emergency response procedures in the event of a notifiable pollution incident. Table 11 Key Management Responsibilities. In summary, the phases to be implemented include the following:

- Alert Phase Monitor incident;
- Stand by Phase Prepare state of readiness if incident has the potential to escalate;
- Call Out Phase Activate the emergency response procedures;
- Clean Up Phase Clean-up when area declared safe; and
- **Stand Down Phase** Deploy response and implement a de-briefing and review of the Hazardous Materials Management Plan and emergency response procedures.

Source of Risk	Method of Communication1	Warning Provided	Stage
Discharge of	Telephone	General warning to	Alert phase if pollution incident involves onsite
Hydrocarbons,	Text message	downstream residents	discharge only.
Chemicals or	Email	to avoid the use of	Operational phase if pollution incident involves
Reagents.	Letter box drop	water in creeks.	offsite discharge.
	Door knocking		Stand down phase when the incident has been
	Community		controlled and there is no harm present.
	Representatives.		
Discharge of	Telephone	General warning to	Alert phase if pollution incident involves onsite
chemical or saline -	Text message	downstream residents	discharge only.
laden water.	Email	to avoid the use of	Operational stage if pollution incident involves
	Letter box drop	water in creeks	offsite discharge.
	Door knocking	(depending on scale of	Stand down phase when the incident has been
	Community	discharge).	controlled and there is no harm present.
	Representatives.		
Discharge of	Telephone	General warning to	Alert phase if pollution incident involves onsite
sediment-laden	Text message	downstream residents	discharge only.
water	Email	to avoid use of water	Operational stage if pollution incident involves
	Letter box drop	in creeks if water	offsite discharge.
	Door knocking	appears cloudy.	Stand down phase when the incident has been
	Community		controlled and there is no harm present.
	Representatives.		
Discharge of	Public announcements	General warning to	Standby phase if evidence of failure of Tailings
Tailings material	- Radio	downstream residents	Storage Facility.
associated with a	- Television	to avoid the use of	Callout phase if actual failure of Tailings Storage
catastrophic failure	- Loudspeaker	water in creeks.	Facility.
of the Tailings	Telephone	Specific warning to	Clean-up phase once discharge stabilised.
Storage Facility.	Text Message	evacuate high risk	
	Email	properties (if	
	Letter box drop	required).	
	Door knocking		
	Community		
	Representatives.		
Discharge of	Telephone	General warning to	Alert phase if pollution incident involves harm
gaseous	Text message	Cobar township to	to people.

Table 10 Community Communication Plan

material/vaporisati	Email	keep windows and	Operational stage if pollution incident involves		
on.	Letter box drop	doors closed and	risk of harm to people.		
/	Door knocking	report any respiratory	Stand down phase when the incident has been		
	Community	symptoms.	controlled and there is no harm present.		
	Representatives.				
Discharge of	Telephone	General warning to	Alert phase if pollution incident involves		
particulate	Text message	Cobar residents	potential harm to people.		
material to air as a	Email	regarding higher dust	Operational stage if pollution incident involves		
result of the failure	Letter box drop	levels within the	harm to people.		
or under	Door knocking	vicinity of Peak Gold	Stand down phase when the incident has been		
performance of the	Community	Mines.	controlled and there is no harm present.		
proposed dust	Representatives.				
control measures.					
Note ¹ : The company has established a communication database identify individuals preferred method of communication.					

Table 11 presents the anticipated key management positions that will be responsible for any pollution incident response. All Health and Safety issues will be managed by the Health and Safety Advisor.

ROLES	PHASE	RESPONSIBILITY		
Position:	Alert	Must ensure adequate resources are available to enable implementation of		
General Manager		emergency response procedures.		
		Review and monitor reported incident.		
	Stand-By	Give direction to notify the responsible personnel of the incident and		
		prepare for a state of readiness if incident has the potential to escalate or is		
		a notifiable incident.		
	Call Out	Notify all relevant agencies (Table 8) of the detail of the pollution incident		
		Activate the community communication plan (Table 10).		
		Control the overall situation and coordinate activities and resources.		
		Determine the priority of actions of employees until agencies and		
		emergency services arrive and liaise with relevant agencies as required.		
		Ensure that perimeters are established and access to the site is control		
	Clean Up	Give direction to clean up the incident following advice that the area is declared safe.		
	Stand Down	Give direction to Stand Down following satisfactory management of the		
		incident.		
Position: Process	Alert	As soon as aware, advise the General Manager of a pollution incident.		
Manager or		Monitor reported incident.		
Delegate	Stand-By	Notify the responsible personnel of the incident and prepare for a state of		
		readiness if incident has the potential to escalate or is a notifiable incident		
	Call Out	If the General Manager cannot be contacted, activate the emergency		
		response procedures in the event of a pollution incident.		
		Notify all relevant agencies (Table 8) of the detail of the pollution incident.		
		Activate the community communication plan (Table 10).		
		Control the overall situation and coordinate activities and resources.		
		Determine the priority of actions of employees until agencies and		
		emergency services arrive and liaise with relevant agencies as required.		
Ensure that perimeters are established and access to the stuation and following confirmation that theClean UpMonitor the situation and following confirmation that the		Ensure that perimeters are established and access to the site is controlled.		
		Monitor the situation and following confirmation that the area is safe,		
		advise the General Manager.		

Table 11 Key Management Responsibilities

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	Stand Down	Give direction for a de-briefing and review of the emergency response		
		procedures.		
	General	Ensure that this Emergency Management Response is tested every 12		
		months.		
		Ensure this Pollution Incident Response Management Plan is reviewed as		
		identified in Section 7.0 .		
		Ensure a hard copy is retained on site.		
Position:	Alert	As soon as aware, advise the General Manager of a pollution incident.		
Environment		Monitor the reported incident.		
Advisor	Stand-By	Prepare for state of readiness when directed to by the General Manager.		
	Call Out	If neither the General Manager nor Processing Manager can be contacted,		
		activate the emergency response procedures in the event of a pollution		
		incident response.		
		Contact the community and implement the required warning system (Table		
		10).		
		Provide owners and occupiers of land updates of any spill incidents as		
		required.		
	Clean Up	Assist with clean-up of the incident when advised that area is safe.		
	Stand Down	Coordinate and manage de-briefing and review as directed by the General		
		Manager.		
	General	Ensure employees are competent in environmental management through training and awareness programs.		
		Ensure visitors and contractors are inducted and aware of emergency		
		pollution incident management procedures.		
		Take photos of the incident if considered safe to do so.		
		Ensure that all accidents, incidents and potential incidents are appropriately		
		investigated.		
All personnel	All	As soon as aware, advise supervisor of a pollution incident. In the absence		
		of the supervisor, advise the Environment Advisor. In their absence advise		
		the General Manager.		
		If safe to do so, undertake spill response procedures as outlined in Figure 7.		

5.2 Evacuation Plan

The following evacuation procedures will be implemented in the event of an incident that will cause harm to the environment and people:

- 1. Employers will be given notification either verbally or by mobile / two-way radio;
- 2. All employees will be evacuated to the carpark outside the surface facility area gate;
- 3. An employee will be assigned to the front of the property to keep out unauthorised persons;
- 4. The surface facility area gate will be locked after all employees have been accounted for; and
- 5. A sign will be placed on the front gate declaring the area contaminated.

6.0 Management Plan Monitoring and Review

6.1 Incident Reporting

In the event that an investigation concludes there are exceedances of the relevant trigger values which is directly attributed to activities associated with the complexes, the event will be reported without delay to the Environmental Protection Agency, Cobar Shire Council and the Resources Regulator. Depending on the nature of the incident, notification may be required to the Natural Resources Access Regulator,



Division of Water and/or the relevant Council. Within seven days of the incident, the company will submit a detailed written report.

Environmental incident reports must include the following information:

- The time, date, location, nature and duration of the incident;
- The location of the place where the environmental harm has, or is likely to occur;
- The potential and / or observed impacts of the incident;
- The circumstances in which the incident occurred (including the cause of incident, if known);
- The action taken or proposed to be taken to deal with the incident and any resulting environmental harm;
- Any actions that have, or will be, taken to deal with the incident and any resulting environmental harm; and
- Any actions that have, or will be, taken to prevent similar incidents from occurring in the future.

Additional Information (such as photos, monitoring data, plans etc.) should be included in the report if relevant.

6.2 Testing of plan

This management plan will be tested at least once every 12 months to ensure that the information contained within the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

The primary method for testing the plan will be via desktop simulations which will be supplemented by periodic exercises or drills.

7.0 Review

This management plan will be reviewed post every desktop simulation trial or once per annum.

8.0 Appendices

Appendix 1: Incident Notification Record Sheet



INCIDENT NOTIFICATION RECORD SHEET

(To be used when reporting incidents externally)

Date:	Time:	
Name of person notifying:		
Position of person notifying:		
Location of Incident:		

Nature of Incident (type of incident, estimated quantities/concentrations):

Circumstances which led to the incident (cause):

Actions being taken or proposed to be taken:

Other information provided:

Follow up required: Y / N

Details:



Authorities notified:

Trigger	Agency	Contact Details	Notified Y/N and
An incident that presents an immediate threat to human health or	Fire and Rescue NSW NSW Police NSW Ambulance Service	Call 000	time
An incident that: • does not require	Environment Protection Authority	Environment Line 131 555	
 an initial combat agency; or once the 000 call has been made 	NSW Health	Cobar District Hospital Phone (02) 6879 9500 Dubbo Base Hospital Phone (02) 6809 6809	
Notify the relevant	SafeWork NSW	Phone 13 10 50	
authorities in the following order.	Cobar Shire Council	Business Hours (02) 6836 5888 After Hours 0419 281 115 (Peter Vlatko – General Manager)	
	Agency	Contact Details	
Agencies to be contacted depending on type of pollution incident:	Department of Planning, Industry and Environment – Resources Regulator	nswresourcesregulator@service- now.com 7-day report, under POEO act	
	Dams Safety NSW	(02) 9842 8073 or 0403 681 645	
	Natural Resources Access Regulator	1800 633 362	
	Crown Lands Division	(02) 6836 3018	
Note: Complying with these not example, those that apply unde	ification requirements does not rer r other environment protection leg	nove the need to comply with any other obligations for inci islation or legislation administered by SafeWork NSW.	dent notification, for

Neighbouring properties notified (as per map location below):

Neighbour	Contact	Notified Y/N
Langton's Lease		
Mafeesh Station & Barrowvale		
Dellavale Homestead		
Nixon's Tank		
Merrises		
Steve Roberts block		
Doug Martin		



