



TOMINGLEY
GOLD OPERATIONS PTY LTD
(A wholly owned subsidiary of Alkane Resources Ltd)

Tomingley Gold Project

Pollution Incident Response Management Plan

Table of Revisions

Revision Number	Revision Date	Prepared By	Approved By:	Comments
Revision 1	Nov 2012	Colleen Measday	Michael Sutherland	Submission for Information
Revision 2	Jan 2014	Mark Williams	Sean Buxton	Annual Review
Revision 3	February 2015	Mark Williams	Sean Buxton	Annual Review
Revision 4	November 2015	Mark Williams	Sean Buxton	Review
Revision 5	September 2016	Mark Williams	Sean Buxton	Review following MOD 3
Revision 6	October 2018	Mark Williams	Simon Parsons	Review
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1. INTRODUCTION AND SCOPE

This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997* to facilitate correct response to a pollution incident at Tomingley Gold Operations (TGO).

The PIRMP also minimises the risk of a pollution incident by identifying and pre-emptively managing potential pollution hazards.

The PIRMP does not detail the procedure for treatment of injured persons or remediation of the environment following a pollution incident.

Tomingley Gold Project is located immediately south of the township of Tomingley. The site is bisected by the Newell Highway. The land is flat and with the Gundong Creek diversion lying in the western portion of the site.

1.1 DEFINITIONS

1.1.1 Pollution incident

The POEO Act 1997 defines a pollution incident as:

“...pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill, or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

1.1.2 Material harm to the environment

Harm to the environment is considered material if:

1. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
2. It results in actual or potential loss of property damage of an amount or amounts in aggregate exceeding \$10,000 (or such other amount as is prescribed by the regulations); and
3. 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.

Harm to the environment includes direct or indirect alteration of the environment with the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

2. IMMEDIATE RESPONSE INFORMATION

2.1 ACTIONS TO BE TAKEN DURING A POLLUTION INCIDENT

In the event of a pollution incident the following actions will be taken:

Ensure Personal Safety. Assess the necessity for evacuation. If evacuation is required then evacuation will be undertaken in accordance with Site Specific Procedure - Emergency

Undertake emergency response other than evacuation.

Contact the Appropriate Regulatory Authorities (ARA).

Take direction from ARA if provided.

If safe and possible to do so, undertake immediate measures to prevent further impacts from the pollution incident.

If required seek assistance from specialist consultants/contractors.

These actions are discussed in more detail below.

2.1.1 Ensure TGO Personnel Safety

If a pollution incident occurs the first priority is to ensure personnel safety. Visually assess the situation and if there is significant risk to human health, undertake proceedings to evacuate the site.

If evacuation is not required, the area shall be isolated and segregated to prevent personnel coming in contact with the incident. Barriers are to be erected, and other isolation measures implemented where available.

If possible to isolate the release by turning off valves safely, this should be carried out.

The area supervisor is to be informed so that senior management can also be advised.

Two-way radio will be used for communication on site during construction and operations. This method of communication will be used to alert personnel working on site of the occurrence of a pollution incident. It is a fast and effective way to communicate so that personnel can ensure their personal safety.

Contact details for relevant TGO personnel are presented in Table 1.

2.1.2 Notification of Authorities

Immediately after TGO is aware of a pollution incident the Emergency Controller as defined in the Site Specific Procedure – Emergency will notify authorities according to the following protocol:

Call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, NSW Police and NSW Ambulance Service. These are the first responders and responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

The EPA

Department of Planning and Environment

The Ministry of Health (via the local Public Health Unit)

Resource Regulator NSW

Narromine Shire Council

Fire and Rescue NSW

Contact details for relevant authorities are presented in Table 2. The information required to be notified is as follows:

The time, date, nature, duration and location of the incident,

The location of the place where pollution is occurring or 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),

The action taken and proposed to be taken to deal with the incident and any resulting pollution or threatening pollution, if known,

Any other information prescribed by regulations.

TGO has a **Duty to notify** the relevant authorities **immediately** if there is a risk of *material harm to the environment*. Any information required that is not known at the time of the incident can be notified when it becomes known.

*Failure to notify in accordance with the Act carries a maximum penalty of \$2 million.

2.1.3 Notification of Neighbours

Neighbours will be contacted directly via phone if there is a risk that a pollution incident may harm their safety or property. Contact details for TGO's immediate neighbours are presented in Table 3.

2.1.4 Consultation of Safety Data Sheets (SDS)

Where a pollutant has an SDS, it shall be consulted to obtain information to assist with pollution incident response, including:

Toxicity, human health impacts and potential environmental impacts;

Containment, clean-up and disposal information specific to the pollutant; and

Appropriate PPE to be worn during handling.

TGO SDS registers are kept at available via the (web-based) Chemwatch program, department offices and chemical storage areas.

2.2 CONTACT DETAILS

Table 1 – Tomingley Gold Operations Key Contacts

KEY CONTACT	POSITION	CONTACT DETAILS (24Hrs)
Ken Bermingham	WHS & Environment Manager	0417 167 532
James Didovich	Processing Manager	0439 923 418
Simon Parsons	General Manager Operations	0458 135 829

Table 2 – Appropriate Regulatory Authorities - Contact Details

Regulatory Authority	Key Contact	Contact Details
NSW Environmental Protection Authority	Dubbo Office – Joshua Loxley	EPA Pollution Line 131 555
Resource Regulator		1300 814 609
NSW Ministry of Health	Public Health Unit – Environmental Health Officer	02 6841 5569 (Dubbo Office)
Narromine Shire Council	General Manager	124 Dandaloo Street Narromine NSW 2821

		(02) 6889 9999	
Fire, Police, Ambulance		000	
Other authorities to be notified depending on the incident impacts are described below and will be contacted if the pollution incident is a threat to the feature.			
Feature	Regulatory Authority	Key Contact	Contact Details
TGO mine lease ML 1648	Division of Resources and Energy	Amy McKenzie – Inspector Environment (BH) or Compliance and Enforcement Department (AH)	T: 02 6360 5336 (BH) or 02 4931 6401 (AH)
Newell Highway	Roads and Maritime Services	Suzie McKay Network and Safety Manager	T: 131 700 - Traffic Incident reporting T: 131782 – Regional Contacts 51-55 Currajong St Parkes NSW 2870
Gundong Creek diversion, (creek west of TGO)	DPI - Water	Tim Baker (Dubbo Office) Senior Planning & Assessment Coordinator	(02) 68417403 M 0428162097

Table 3 – Neighbours contact details

Neighbour	Distance	Key Contact	Contact Details
NORTH			
40 Myall Street, Tomingley (closest resident to site)	300m	Christine Sonter	0427 699 246
38 Myall Street, Tomingley (2nd house from the site)	350m	Stephen Whatsford	0466352292
36 Myall Street, Tomingley (3rd house from the site)	400m	Elaine Buckley	02 6869 3240
“Harts Cottage” Genanegie Street, Tomingley	350m	Christine and Barry Unger	02 6885 1544 0439 975 084
SOUTH WEST			
“Dunoon” McNiven Lane, Tomingley	2km	Max and Anne McNiven	02 6869 3257
EAST			
“Ellerslie” Thornycroft Road, Tomingley	1.7km	Brad Pugh	0432348456
SOUTH			

Neighbour	Distance	Key Contact	Contact Details
"Rosewood"	2.5km	Graham and Lynne Hando	02 6869 3210 0401 473 006
NORTH WEST			
"Lily Vale"	2km	Sally and Wes Bouchier	02 6869 3215 0429 010 957

2.3 SITE MAP



3. ACTIONS FOLLOWING A POLLUTION INCIDENT

3.1 CLEAN UP AND RECOVERY

Following a pollution incident key personnel will develop a clean-up and recovery plan. It may be possible to undertake this using resources on site or depending on the situation may require the engagement of emergency services or professional clean-up crews with breathing apparatus and sophisticated recovery plant.

3.2 INCIDENT REPORT

Following a pollution incident TGO will undertake a comprehensive investigation of the event and complete and Incident Report (template in Appendix 2). Within 7 days of the incident this report will be issued to authorities.

4. PRE-EMPTIVE ACTIONS TO MINIMISE POLLUTION INCIDENT RISK

The following actions have been implemented to minimise pollution incident risk.

- A Pollution Incident Risk Assessment has been undertaken and is included in Appendix 1. This assessment allows TGO to identify the risks associated with activity, put management measures in place to reduce the likelihood of any significant risks occurring and therefore minimise the likelihood of a pollution incident.
- Administrative controls in relation to the carrying out works adjacent to dirty and clean water drainage structures – Red Zone Works Authorisation Site specific Procedure and Trigger Action Response Plans (TARP's) – Pre Rain Inspections Site Specific Procedure
- Regular inspection of the integrity of dirty water containment and drainage structures, chemical bunding, pipelines, containers and workshop areas allows TGO to identify any potential for an incident due to wear and tear or physical damage on a regular basis. This combined with regular maintenance helps to minimise the likelihood of an incident.
- Staff training via toolbox talks in the storage and handling of liquids, clean-up of spills and emergency procedures helps to minimise the likelihood of an incident occurrence and prevents a small issue escalating into an incident.
- In addition to this PIRMP, TGO operates using a comprehensive Environmental Management Strategy and Safety Plan. These plans help to ensure that TGO operations are undertaken with full consideration and management of the risks involved and ensures that we operate in a planned, practiced way using correct standards and procedures.

4.1 INVENTORY OF POTENTIAL POLLUTANTS

The table below provides an indicative inventory of the potential pollutants on site.

Table 6 – Inventory of potential pollutants

Product	Location	Maximum Quantity
Diesel Fuel	Mining Contractor Yard	200,000 litres
Lubricants	Processing Workshop	3000 litres
Lubricants	Contractors Workshops (Emeco)	23000 litres
Lubricants	Contactors Workshop (Maxfield)	3000 litres
Sodium Cyanide	Reagents Compound	180,000 litres
Sodium Hydroxide	Reagents Compound	54,000 litres
Hydrochloric Acid	Reagents Compound	25,000 litres
Sodium Metabisulphite	Reagents Compound	20,000 litres
Copper Sulphate	Reagents Compound	20,000 litres
LPG	LPG Storage Area	4 x 6750 litre tanks
Ammonium Nitrate	Magazine Yard	70 tonnes
Ammonium Nitrate Prill	Magazine Yard	24 tonnes
Gasser Solution	Magazine Yard	2000 litres
Process Residue	Residue Storage Facility (RSF)	3.82Mm ³
Supernatant Water	Residue Storage Facility (RSF)	14ML
Process water	Process Water Dam	10,000,000 litres
Mining impacted water	Central Storage Dam (RSF water)	162.5ML
Mining impacted water	Central Storage Dam (dirty water cell)	78,200 Litres
Sediment Basin 1	West of processing plant	20,200,000 litres
Sediment Basin 2	South West corner of residue storage facility	5,200,000 litres
Sediment basin 3	South of magazine	10,700,000 litres
Sediment Basin 4	South of Waste Rock Emplacement 3	34,000,000 litres
Sediment Basin 5	North of Caloma 1 pit	9,700,000 litres
Sediment Basin 7	South West of Caloma 2 pit	4,600,000 litres

4.2 INVENTORY OF SAFETY EQUIPMENT AND MEASURES

Table 4 – Equipment available on site during mining operations to help in the event of a pollution incident

Product	Location	Purpose
Spill Kit	Process Plant	Control of minor spills
SDS Registers	Administration Offices, workshops	Provide data on chemicals
First Aid Kits	Administration Offices, vehicles	For administering first aid
Fire Extinguishers	Scattered all through process plant and buildings, all vehicles	Control of any minor fire
Water Cart with fire cannon and foam capability	Mining area	Control of larger fires
Fire Hydrants	Fire ring main around plant	Control of larger fires
Oxy-Viva	Process Plant	Cyanide poisoning equipment
Emergency Shower	Process Plant	For administering first aid

Table 5 – Pollution control measures for the site

Product	Storage Facility
Diesel Fuel	Self bunded enclosure.
Lubricants	In dedicated cabinets, or in site containers, so that all minor spills do not reach the environment.
Sodium Cyanide	Bunded enclosure to 110% of entire vessel storage volume with impervious floors and walls. Tanker unloading area has an impervious apron, with drainage back to main storage bund.
Sodium Hydroxide	Bunded enclosure to 110% of entire vessel storage volume with impervious floors and walls. Tanker unloading area has an impervious apron, with drainage back to main storage bund.
Hydrochloric Acid	Bunded enclosure to 110% of entire vessel storage volume with impervious floors and walls. Tanker unloading area has an impervious apron, with drainage back to main storage bund.
Sodium Metabisulphite	Bunded enclosure to 110% of largest vessel storage volume with impervious floors and walls.
Copper Sulphate	Bunded enclosure to 110% of largest vessel storage volume with impervious floors and walls.
LPG	Certified storage vessels to Australian codes and standards
Mine Impacted waters	Sediment Basins compliant with 10 Day interval requirements of the Landcom Managing Urban Stormwater: Soils and Construction – “The Blue Book”

5. TRAINING

The following training will be undertaken to ensure that the PIRMP is well understood and that all staff are familiar with the requirements of the plan and the key steps to manage a pollution incident:

- The requirements of the PIRMP will be included as part of the TGO General Induction.
- TGO Managers, Superintendents and Supervisors will be made aware of the requirements of the PIRMP.

6. ACCESS TO THE PIRMP

A hard copy along with the EPL will be kept at the front counter in the administration building.

An electronic copy will be kept in the TGO controlled documents register:

T:\Tomingley_Gold_Operations\07_TGO_Controlled_Document_Register\01_Controlled_Documents_Register\04 Management Plans\02 Environment & Community

The PIRMP is also available on the project website www.alkane.com.au

7. TESTING OF THE PIRMP

The PIRMP will be tested annually, with the first test being undertaken within the first 6 months of construction and annually thereafter.

Testing of the PIRMP will include:

- A desktop review of the plan to ensure that the information is accurate and up to date.
- A drill exercise to simulate one of the potential incidents identified within the risk assessment in Appendix 1.

As it is a requirement of the legislation, this plan will also be tested within one month of any pollution incident occurring on site.

Table 7 - Register for Testing the PIRMP

Date of Test	People Involved	Comments/Outcomes
18 December 2014	Safety Manager, Environment and Community Manager, processing personnel.	A mock evacuation and desktop scenario (Cyanide Spill) was conducted on the 18 th of December for the processing department. The evacuation of the plant was undertaken in under five minutes with all persons accounted for. A debrief of the exercise was conducted and learnings will be incorporated into the evacuation process. The evacuation also formed part of the compliance program for testing of the TGO Pollution Incident Response Management Plan (PIRMP).
21 May 2015	Operations Manager, Safety and Training Manager, Environment and Community Manager, Processing Superintendent, Administration Supervisor	A mock scenario where high levels of WAD Cyanide measured in the RSF causing bird deaths. And injury to an employee.

2 December 2017	Mining Manager, Environment and Community Manager, Environmental Officer.	The plan was tested as part of the response to the dirty water discharge from sediment basin 1. The plan was assessed as being satisfactory with all relevant contact information and responses being current.
17 October 2018	Environment and Community Manager and Environmental Officer.	The plan was tested as a part of the response to the discharge of dirty water to the clean water drain as a result of internal erosion in the separation levee. All contacts remained valid. Environmental Officer acted as the Emergency controller and implemented actions in accordance with the plan. TGO staff and contractors were tasked with stopping flow of water and pumping dirty water from temporary bunds.
14 August 2019	Processing Manager, WHS & Environment Manager and Environmental Coordinator	The plan was tested as part of the response to a process water spill resulting in potentially contaminated groundwater. The plan was assessed as being satisfactory, with only a few minor amendments, the inclusion of some additional risks and an update of contact details required.

8. LEGAL REQUIREMENTS AND CONSULTATION

The Protection of the Environment Legislation Amendment Act 2011 introduced changes designed to improve the way pollution incidents are reported and managed in NSW. The changes apply to the holders of Environmental Protection Licences.

The requirements for PIRMP are set out in Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act 1997) and the Protection of the Environment Operations (General) Regulation 2009. In summary these provisions require that:

- all holders of an Environment Protection Licence prepare, implement and test a PIRMP;
- the plan includes the information detailed in the POEO Act 1997 (section 153C). These requirements are reproduced in Table 1;
- the plan must be kept at the premises to which the Environment Protection Licence relates.

Table 8 – Requirements for a PIRMP, Section 153C (d) Protection of the Environment Operations Act 1997

Clause Number	Requirement	Section in this Plan
98 C (1) a	A description of the hazards to human health or the environment associated with the activity to which the licence relates	Appendix 1
98 C (1) b	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Appendix 1
98 C (1) c	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.	Section 4

Clause Number	Requirement	Section in this Plan
98 C (1) d	An inventory of potential pollutants on the premises or used to carry out the relevant activity	Section 4.2
98 C (1) e	The maximum quantity of any pollutant that is likely to be stored or held at particular locations including underground tanks at or on the premises to which the licence relates	Section 4.2
98 C (1) f	A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident	Section 4.1
98 C (1) g	The names positions and 24 hour contact details of those key individuals who; <ul style="list-style-type: none"> • Are responsible for activating the plan • Are authorised to notify relevant Authorities under section 148 of the Act • Are responsible for managing the response to the pollution incident 	Section 2.2
98 C (1) h	Contact details of each relevant authority referred to in section 148 of the act.	Section 2.2
98 C (1) i	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of the premises in the vicinity of the premises to which the licence relates	Section 2.1.3
98 C (1) j	The arrangements for minimising the risk of harm to any persons who are present where the scheduled activity is being undertaken	Section 2.1.1
98 C (1) k	A detailed map showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of pollutants	Figure 2.3

Clause Number	Requirement	Section in this Plan
	on the premises, and the location of stormwater drains on the premises,	
98 C (1) l	A description of how any identified risk of harm to human health will be reduced, including as a minimum, means of early warnings, updates and the action to be taken during or immediately following a pollution incident to reduce the risk,	Appendix 1 and Section 2.1
98 C (1) m	The nature and objectives of any staff training program in relation to the plan,	Section 4.1
98 C (1) n	The dates on which the plan has been tested and the name of the person who carried out the test,	Table 4
98 C (1) o	The dates on which the plan is updated,	Table of Revisions
98 C (1) p	The manner in which the plan is to be tested and maintained,	Section 5
Other Requirements of the plan		
	<p>Availability of the plan. The plan is to be available to an authorised officer on request and on the premises to which the licence relates or where the activities take place and to any person who is responsible for implementing the plan</p> <p>The plan is to be made publicly available within 14 days of its preparation in a prominent location on a publicly accessible website of the person who is required to prepare the plan</p>	Section 6
	<p>Testing of the plan is to be carried out in such a manner as to ensure information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.</p> <p>The test is to be carried out at least once every 12 months and within one month of any pollution incident occurring in the course of an activity to which the licence relates so as to</p>	Section 7

Clause Number	Requirement	Section in this Plan
	assess, in the light of an incident, whether 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.	

Appendix 1

Pollution Incident Risk Assessment

Risk Assessment
Risk Rating Matrix

Likelihood	Consequences				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A (Almost Certain)	H	H	E	E	E
B (Likely)	M	H	H	E	E
C (Possible)	L	M	H	E	E
D (Unlikely)	L	L	M	H	E
E (Rare)	L	L	M	H	H

Consequence of Occurrence: 1 = Insignificant; 2 = Minor; 3 = Moderate; 4 = Major; 5 = Catastrophic

Likelihood of Occurrence: A = Almost Certain; B = Likely; C = Possible; D = Unlikely; E = Rare

Risk Rating: E = Extreme; H = High; M = Moderate; L = Low

Risk Source	Unmitigated Risk Ranking	Mitigation	Consequence of Occurrence if Mitigated	Likelihood of Occurrence if mitigated	Residual Risk Rating
Pollution of groundwater due to major hydrocarbon spill	3C=H	Training on hydrocarbon management, adequate bunding, spill kit available	3	E	M
Pollution of surface water due to a major hydrocarbon spill	3C=H	Training on hydrocarbon management, adequate bunding, spill kit available	3	E	M
Initiation of fire on the mine site and spread to adjoining properties	5C=E	Fire breaks between mine and houses, firefighting equipment on site, procedures for storage and usage of flammable materials	3	E	M
Sewage Spill causes impact to human health, surface water or ground contamination	5D=E	Use a licensed contractor to service toilets, do not locate toilets near surface water, empty toilets regularly	5	E	H

Risk Source	Unmitigated Risk Ranking	Mitigation	Consequence of Occurrence if Mitigated	Likelihood of Occurrence if mitigated	Residual Risk Rating
Cyanide Spill causes damage to human health	5D=E	Training of staff on cyanide management, adherence to cyanide code of practice, using a licensed contractor to transport cyanide,	5	E	H
Discharge during heavy rainfall causing erosion and sediment impact to the environment	3C = H	Preparation and implementation of sedimentation and erosion control plan and regular maintenance of control measures	2	D	L
Dust emissions causing impact to human health	3C = M	Use water carts for dust suppression during construction, vehicles to stick to designated haul roads, monitoring of weather forecast and modification of activities if there is wind in the direction of the Tomingley Village.	2	C	M

Risk Source	Unmitigated Risk Ranking	Mitigation	Consequence of Occurrence if Mitigated	Likelihood of Occurrence if mitigated	Residual Risk Rating
Tailings wall failure	5C = E	Routine inspections Designed in accordance with relevant regulations Annual independent review Trained personnel in dam surveillance	5	E	H
Contaminated slurry spill outside bunded area	5A = E	Bunded facility Flow alarms Routine inspections Trained Personnel Mill control system	3	D	M

Note: Incidents involving light and noise are not defined as "Pollution Incidents" by the EPA.

Appendix 2

Incident Report – Template



TOMINGLEY
GOLD OPERATIONS PTY LTD
(A wholly owned subsidiary of Alkane Resources Ltd)

Incident Report

Date Report Raised			
Raised By			
Date of Incident			
Description of Incident			
Corrective Action		Completed By	Due Date
Preventative action		Completed By	Due Date
Incident Report Closed out By:	Signed by Issuer		
Comments	Date		