



LMS NSW Facilities: Integrated Pollution Incident Response Management Plan (PIRMP)

Prepared by LMS ENERGY Pty Ltd

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Document Control

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1. Purpose of the Integrated Pollution Incident Response Management Plan

1.1. Introduction

This Integrated Pollution Incident Response Management Plan (PIRMP) was developed to comply with the *Protection of the Environment Operations Act 1997* (POEO Act), section 153A, using guidance provided in the *NSW EPA Guideline: Pollution Incident Response Management Plans*. This is an overarching document, summarising:

- LMS’ licenced NSW facilities with PIRMP obligations.
- Agency contact details (local, state and national).
- PIRMP testing, training and review.
- Public pollution data (i.e., notification procedures and monitoring data).
- Site-specific documents such as Emergency Response Plans (ERPs), Operational Environmental Management Plans (OEMP) and Procedures (Section 4.2).

The management of pollution related environmental impact risk must comply with all relevant Environment Protection Licence (EPL) legislative requirements, in accordance with LMS’ Environmental Policy and the ISO14001 certified environmental management system (EMS).

Note that detailed pollution incident procedures are included in location-specific ERPs, which are available in hard copy at each LMS facility.

This Integrated PIRMP is publicly available on LMS’ external website.

1.2. Applicable Facilities

Table 1 provides a list of LMS’ NSW sites, corresponding EPL references and contact details for the relevant Local Council and NSW Health offices which may need to be contacted in the event that a pollution incident occurs or is threatened to occur.

Table 1 LMS NSW Facilities, EPL Numbers and Local Authorities

LMS Facility	EPL	Local Council
Buttonderry (Wyong)	20059	Central Coast Council 1300 463 954
Eastern Creek	12569	Blacktown City Council (02) 9839 6000
Lucas Heights	6345	Sutherland Shire Council (02) 9710 0333
Raymond Terrace	21775	Port Stephens Council (02) 4988 0255
Summerhill	13059	Newcastle City Council (02) 4974 2000

1.3. Definitions

The following terms are used in this Integrated PIRMP and the site-specific ERPs for each LMS facility:

- **Chemwatch:** Chemical safety management system to maintain an updated SDS register for hazardous substances held at each LMS facility.
- **ELMO:** Employee learning and development software which includes environmental training.
- **ERP:** Emergency Response Plan. Site specific plan for dealing with emergencies including first aid and environmental incidents. Includes information on procedures and contact details.
- **Material harm to the environment:**
 - (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 \$50,000¹ (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.
- **OEMP:** Operations Environmental Management Plan. Site specific plans on the environmental management plans put in place on an operational level.
- **Pollutant:** Any substance which may cause harm to the environment or human health if released from site.
- **Pollution incident:** 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.
- **SDS:** Safety Data Sheet.
- **SkyTrust:** LMS' incident reporting and investigation management system.

1.4. State/National Agencies

Where a notifiable pollution event takes place which causes or threatens to cause material harm to the environment, it is understood that event is required to be reported immediately² to the following authorities (Table 2):

- The EPA, and any other regulatory authority.
- Fire and Rescue NSW (if incident requires assistance from the emergency services due to resulting health or fire concern).
- SafeWork NSW (if incident involves a health or safety related aspect which is deemed notifiable by either authority).
- The relevant local council.

¹ Except for Lucas Heights, which is \$10,000 as per the Development Consent (Reference: SSD-79933225).

² Immediately: *Promptly and without delay.*

Table 2 State and national agency contacts

Authority	Contact
NSW Environmental Protection Authority (Pollution Hotline)	131 555
Fire & Rescue (National)	000 (Emergency)
Fire and Rescue NSW	000 (Emergency) 02 9265 2999 (General Enquiries)
NSW Rural Fire Service	000 (Emergency) 1800 NSW RFS (1800 679 737) (Bush Fire Information Line)
Safe Work NSW	131 050

2. Integrated Pollution Incident Response Management Plan (PIRMP)

Table 3 below provides a cross-reference to the PIRMP requirements outlined under the *NSW EPA Guideline: Pollution Incident Response Management Plans* and how LMS' has addressed the requirements.

The relevant internal references (ERP, OEMP, Procedures) and external references (statutory requirements) are listed at Section 4.

Table 3 Cross-reference to PIRMP requirements in detail

EPA Pollution Incident Response Management Plan Guideline Requirements	LMS Energy Reference
2.1 Form the PIRMP must take. <i>Section 71(a) and 74(1) of the General Regulation.</i>	<p>This Integrated PIRMP is in written form and is available at the premises via a QR code so it can be provided to an authorised EPA officer on request.</p> <p>The site specific PIRMP forms part of the site specific Emergency Response Plan (ERP) and can be found within the controlled document.</p>
2.2.1. Implementing the PIRMP. <i>Section 153F of the POEO Act</i>	<p>If a pollution event occurs that causes or threatens to cause material harm to the environment, this Integrated PIRMP and the site-specific PIRMPs within the ERPs listed at Section 4.2 must be implemented. It is understood by LMS personnel (via induction training) that it is an offence to not implement the PIRMP in such an event.</p>
2.2.2. Making the PIRMP publicly available. <i>Section 153D of the POEO Act and section 74(1) and 74(2) of the General Regulation</i>	<p>This Integrated PIRMP is in written form and is available publicly through the LMS website.</p> <p>Site specific PIRMP's are found within the ERPs, which is displayed in a prominent location within the site office.</p>
2.2.3. Testing the PIRMP. <i>Section 75(1)(a) and 75(1)(b) of the General Regulation</i>	<p>This Integrated PIRMP shall be tested annually either through a desktop scenario or practical scenario. A practical scenario will occur annually at an LMS facility on a rotational basis. Where practicable, PIRMP drills will include staff from nearby LMS facilities to share learnings and improve practices.</p> <p>This Integrated PIRMP shall also to be tested within one month of a reportable pollution incident. Activation of the PIRMP during a pollution incident does not constitute a test.</p> <p>PIRMP test results shall be maintained within the LMS database to include the information outlined at section 2.5 of the <i>NSW EPA Guideline: Pollution Incident Response Management Plans</i>.</p>
2.3.1. Description and likelihood of hazards. <i>Section 72(a) and 72(b) of the General Regulation.</i>	<p>The site-specific OEMPs include a risk assessment, outlining the likelihood of hazards before and after controls are put in place through a risk matrix.</p> <p>The determination of risks considers the impact and likelihood of harm to human health and the environment.</p>
2.3.2. Pre-emptive actions. <i>Section 72(c) of the General Regulation.</i>	<p>The site-specific OEMPs include a risk assessment which details the controls put in place for identified hazards and includes their effectiveness at mitigating risk.</p> <p>Pre-emptive actions include (but is not limited to) the storage and handling procedures of substances handled on site, auditing procedures and preventative maintenance procedures.</p>

EPA Pollution Incident Response Management Plan Guideline Requirements	LMS Energy Reference
	<p>The pre-emptive actions are based on industry standards and best practice, as well learnings from internally reported hazards, near-miss incidents and incidents.</p>
<p>2.3.3. Inventory of pollutants. <i>Section 72(d) and 72(e) of the General Regulation.</i></p>	<p>A register of substances held on each site can be found within the Chemwatch system, accessible via QR codes found on site.</p> <p>This register maintains an up-to-date Safety Data Sheet (SDS) of all chemicals stored on site. The Chemwatch system is maintained by the LMS Safety Team with regular reviews to ensure that all substances are adequately represented.</p>
<p>2.3.4. Safety equipment. <i>Section 72(f) of the General Regulation.</i></p>	<p>The location of safety equipment can be found within each site-specific ERP. This includes firefighting equipment, safety showers, spill response equipment and first aid equipment.</p> <p>The G7 PR551 procedure outlines the safety requirements of gas monitoring safety equipment via the G7 device.</p> <p>Up-to-date safety data sheets for all substances are found within Chemwatch.</p> <p>All personnel on site must wear PPE as outlined by exterior signage and must be inducted and appropriately trained for any task they are conducting.</p> <p>Spill kits shall meet the LMS standard and contain heavy duty gloves and eye protection and are checked monthly during site inspections.</p>
<p>2.3.5. Contact details. <i>Sections 153C(a) and 148 of the POEO Act and section 72(g) of the General Regulation.</i></p>	<p>Each site-specific ERP contains the 24-hour contact details of the individuals who are responsible for activating the PIRMP and are authorised to notify the relevant authorities.</p> <p>The relevant authorities' contact details can be found in each site-specific ERP, as well as this Integrated PIRMP and include the EPA, Fire and Rescue NSW, SafeWork NSW and the relevant local council (Table 2).</p> <p>All LMS staff are responsible for activating the PIRMP upon becoming aware of a pollution incident occurring or threatening to occur.</p>
<p>2.3.6. Communicating with neighbours and the community. <i>Section 72(i) of the General Regulation.</i></p>	<p>In accordance with the POEO Act, emission testing results for licensed facilities shall be made available to the public via LMS' website.</p> <p>If an environmental event occurs that requires notifying neighbours, the Environment & Compliance team will ensure that all affected parties are notified. The Environment or Compliance Supervisor will determine the most appropriate method of notification.</p>
<p>2.3.7. Minimising harm to people on the premises. <i>Section 72(j) of the General Regulation.</i></p>	<p>Each site-specific ERP contains safety information, procedures, an emergency evacuation plan and the locations of emergency facilities such as hospitals.</p> <p>Staff are trained to deal with emergency incidents and PPE requirements are upheld in accordance with the individual needs of each site.</p>
<p>2.3.8. Maps. <i>Section 72(k) of the General Regulation.</i></p>	<p>Detailed maps are included in each site-specific ERP including annotated aerial imagery of the site denoting site access and location</p>

EPA Pollution Incident Response Management Plan Guideline Requirements	LMS Energy Reference
	<p>of the LMS facility within the site. Site layout plans can also be found within each ERP.</p> <p>Maps showing the transport route to the nearest medical facility are also found within each ERP. Maps found within the ERP will detail the safety equipment including fire extinguishers and safety showers.</p> <p>Each site will have an approved Stormwater Management Plan (SMP) and an Erosion and Sediment Control Plan (ESCP), which will detail overland flow and key stormwater infrastructure features.</p>
<p>2.3.9. Actions to be taken during or immediately after a pollution incident. <i>Section 72(l) of the General Regulation and section 153C of the POEO Act.</i></p>	<p>The LMS Spill Response Procedure – PR84 details the actions taken in response to a pollution incident.</p> <p>These actions include the safety requirements, assessment and management of the incident and follow up procedure including the reporting and debriefing of the incident.</p> <p>Incidents shall be reported into SkyTrust for internal management and investigation.</p>
<p>2.3.10. Staff training. <i>Section 72(m) of the General Regulation.</i></p>	<p>LMS staff receive formal and informal training in pollution incident management. Formal training involves LMS and site inductions, as well as awareness training through ELMO. Informal training is also conducted by site personnel when needed.</p> <p>Training in the form of toolbox talks and environmental alerts keeps LMS staff up-to-date on changing requirements and procedures with relevant staff being required to read and sign an acknowledgement of the training module.</p> <p>Environmental training includes spill response, General Environmental Duty (GED) training and awareness of reporting thresholds and site license requirements. Staff are trained in the management of pollution incidents involving sensitive receptors.</p> <p>PIRMP drills are used as training in the usage of spill equipment and regulatory requirements.</p>
<p>2.3.11. Testing and updating the PIRMP. <i>Sections 72(n), 72(o) and 72(p) of the General Regulation.</i></p>	<p>Each LMS facility will undergo an annual PIRMP test. This testing may be in the form of a practical drill, or a desktop scenario. The practical drill will occur at one (1) LMS facility, with the location changing on a rotational basis.</p> <p>Where practicable, PIRMP drills will include staff from nearby LMS facilities to share learning and improve PIRMP practices. All staff present on site are expected to participate in the testing, unless the site supervisor deems otherwise.</p> <p>Testing of the PIRMP will occur within one (1) month of a reportable pollution incident. Activation of the PIRMP cannot be considered a test.</p> <p>Test records shall be maintained within the LMS database and will be submitted to the EPA upon request. Information included on the testing includes the type of test, date tested, personnel involved, a description of the test and any findings which require follow-up.</p> <p>If significant changes are made to the LMS facility, a review and test of the PIRMP should be undertaken. As this PIRMP is an overarching</p>

EPA Pollution Incident Response Management Plan Guideline Requirements	LMS Energy Reference
	document covering all LMS facilities in NSW, a review will also occur if LMS acquires or surrenders any licensed facilities in NSW.
2.4 Specific requirements for trackable waste transport licences and licences for environmentally hazardous chemicals – non-premises based	Not applicable to LMS operations.
2.5. Demonstrating compliance with PIRMP requirements.	<p>Records of changes to this Integrated PIRMP will be maintained with version number and changes recorded. Superseded versions of the Integrated PIRMP to be held within the LMS database.</p> <p>Details of the Integrated PIRMP including test records will be stored within the external system and will include the nature of the dates, participants, nature of test and findings. All documents related to the PIRMP including site specific ERP's and test records will be presented to the authorised EPA officer upon request.</p> <p>This document will be publicly available as per the EPA requirement.</p>
2.6. Penalties for non-compliance with PIRMP requirements	<p>It is understood by LMS that it is an offence for a corporation with a licensed activity to:</p> <ul style="list-style-type: none"> • Fail to develop a PIRMP or to fail in keeping the PIRMP on the licensed facility. • Fail to test the PIRMP in accordance with the regulations. <p>Maximum penalty for the above offences are:</p> <ul style="list-style-type: none"> • \$2,000,000 for corporations and \$240,000 per day for continuing offences. • \$500,000 for individuals and \$120,000 per day for continuing offences. <p>It is understood by LMS that it is an offence if the PIRMP is not implemented, so that material environmental harm is caused or threatened. Maximum penalties for this are:</p> <ul style="list-style-type: none"> • \$4,000,000 for corporations and \$480,000 per day for continuous offences. • \$1,000,000 for individuals and \$240,000 per day for continuous offences.

3. Document Revision

As required under the *NSW EPA Guideline: Pollution Incident Response Management Plans*, this Integrated PIRMP shall be reviewed at least annually by LMS.

Other triggers for review and update of this Integrated PIRMP outside of the required review cycle may include, but not be limited to:

- Within one month of any pollution incident occurring which caused or threatened material harm to the environment.
- Following the issue of project approvals and licences required to comply with PIRMP obligations.
- Changes to relevant legislation or project licences.

- Significant changes to operational methods or site conditions that require a revision of site-specific documents (i.e., ERP, OEMP and Procedures).

4. References

4.1. External

Guideline: Pollution Incident Response Management Plans. NSW EPA, 2026
ISO14001:2026 International Standard for Environmental Management Systems
<i>Protection of the Environment Operations Act 1997</i>
<i>Protection of the Environment Operations (Clean Air) Regulation, 2022</i>
<i>Protection of the Environment Operations (General) Regulation, 2022</i>
<i>Protection of the Environment Operations (Noise Control) Regulation, 2017</i>
<i>Protection of the Environment Operations (Waste) Regulation, 2014</i>
Requirements for Publishing Pollution Monitoring Data. NSW EPA, 2013

4.2. Internal

DOCUMENT NO:	DOCUMENT NAME:
C000	MASTER DOCUMENT LIST
PR551	G7 (Gas Monitor) Procedure
PR84	Spill Response Procedure
20054-RG-010	Lucas Heights Emergency Response Plan
20054-RV-002	Lucas Heights Operations Environmental Management Plan
20040-RG-007	Buttonderry Emergency Response Plan
20040-RG-004	Buttonderry Operations Environmental Management Plan
20026-RG-003	Eastern Creek 2 Operations Environmental Management Plan
20026-RG-007	Eastern Creek 2 Emergency Response Plan
20048-RG-010	Raymond Terrace Emergency Response Plan
20048-RG-007	Raymond Terrace Operations Environmental Management Plan
20014-RG-009	Summerhill Emergency Response Plan
20014-RG-005	Summerhill Operations Environmental Management Plan