

# Annual Environmental Management Report



1<sup>st</sup> July 2018 to 30<sup>th</sup> June 2019

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AUTHORISED BY Kurt Baumgart, General Manager

Date Authorised: 30.7.19



1.0	Title Block .....	8
2.0	STATEMENT OF COMPLIANCE .....	9
3.0	INTRODUCTION .....	10
	<b>3.1 Purpose</b>	<b>10</b>
	<b>3.2 Scope</b>	<b>10</b>
	<b>3.3 Background</b>	<b>10</b>
	<b>3.4 Objectives</b>	<b>14</b>
	<b>3.5 Environment Management</b>	<b>14</b>
	<b>3.6 Terminal Contact</b>	<b>15</b>
	<b>3.7 Actions Arising From Previous AEMR Review</b>	<b>15</b>
4.0	ADMINISTRATIVE CONDITIONS .....	15
	<b>4.1 Obligation to minimize harm to the Environment</b>	<b>16</b>
	<b>4.2 Terms of Approval</b>	<b>16</b>
	<b>4.3 Limits on Approval</b>	<b>17</b>
	<b>4.4 Management Plans / Monitoring Programs</b>	<b>17</b>
	<b>4.5 Surrender of Consents</b>	<b>17</b>
	<b>4.6 Structural Adequacy</b>	<b>18</b>
	<b>4.7 Demolition</b>	<b>18</b>
	<b>4.8 Operation of Plant &amp; Equipment</b>	<b>18</b>
	<b>4.9 Dispute Resolution</b>	<b>18</b>
5.0	SPECIFIC ENVIRONMENTAL CONDITIONS .....	19
	<b>5.1 Noise</b>	<b>19</b>
	5.1.1 Noise Standards and Performance Measures	19
	5.1.2 Noise Monitoring	20
	5.1.3 Trends in Noise Emissions	21
	5.1.4 Noise –Activities undertaken during 2018/2019 Reporting Period	21
	5.1.5 Noise - Activities Planned for 2019/2020 Reporting Period	21
	<b>5.2 Transport</b>	<b>22</b>
	5.2.1 Transport Standards and Performance Measures	22
	5.2.2 Transport Monitoring	22

5.2.3 Trends in Transport	23	
5.2.4 Traffic –Activities Undertaken During 2018/2019 Reporting Period	24	
5.2.5 Traffic - Activities Planned for 2019/2020 Reporting Period	24	
<b>5.3 Air Quality</b>		<b>25</b>
5.3.1 Air Quality Standards and Performance Measures	25	
5.3.2 Air Quality Monitoring and Compliance	26	
5.3.3 Trends in Air Quality	32	
5.3.4 Air Quality –Activities Undertaken During 2018/2019 Reporting Period	33	
5.3.5 Air Quality - Activities Planned for 2019/2020 Reporting Period	36	
<b>5.4 Meteorological</b>		<b>37</b>
5.4.1 Meteorological Monitoring Standards and Performance Measures	37	
5.4.2 Meteorological Monitoring	37	
5.4.3 Trends in Weather	38	
5.5.1 Surface Water Standards and Performance Measures	39	
5.5.2 Surface Water Monitoring	39	
5.5.3 Trends in Surface Water Monitoring	42	
5.5.4 Surface Water –Activities Undertaken During 2018/2019Reporting Period	43	
5.5.5 Surface Water - Activities Planned for 2019/2020 Reporting Period	44	
<b>5.6 Biodiversity</b>		<b>45</b>
5.6.1 Biodiversity Standards and Performance Measures	45	
5.6.2 Biodiversity Monitoring	45	
5.6.3 Trends in Biodiversity	45	
5.6.4 Biodiversity –Activities Undertaken During 2018/2019 Reporting Period	46	
5.6.5 Biodiversity - Activities Planned for 2019/2020 Reporting Period	47	
<b>5.7 Visual Amenity</b>		<b>47</b>
5.7.1 Visual Amenity Standards and Performance Measures	47	
5.7.2 Visual Amenity Monitoring	48	
5.7.3 Trends in Visual Amenity	48	
5.7.4 Visual Amenity –Activities Undertaken During 2018/2019 Reporting Period	48	
5.7.5 Visual Amenity - Activities Planned for 2019/2020 Reporting Period	51	
<b>5.8 Greenhouse and Energy Efficiency</b>		<b>51</b>
5.8.1 Greenhouse and Energy Efficiency Standards and Performance Measures	51	



5.8.2 Greenhouse and Energy Efficiency Monitoring	51
5.8.3 Trends in Energy Efficiency	53
5.8.4 Energy Efficiency –Activities Undertaken During 2018/2019 Reporting Period	54
5.8.5 Energy Efficiency - Activities Planned for 2019/2020 Reporting Period	55
<b>5.9 Waste</b>	<b>55</b>
5.9.1 Waste Standards and Performance Measures	55
5.9.2 Waste Monitoring	55
5.9.3 Trends in Waste	57
5.9.4 Waste –Activities Undertaken During 2018/2019 Reporting Period	58
5.9.5 Waste - Activities Planned for 2019/2020 Reporting Period	58
<b>5.10 Hazards</b>	<b>58</b>
5.10.1 Hazards Standards and Performance Measures	58
5.10.2 Hazards Monitoring	58
<b>5.11 Fire Control</b>	<b>59</b>
5.11.1 Fire Control Standards and Performance Measures	59
5.11.2 Hazards Monitoring	59
5.11.3 Fire Control – Activities Undertaken During 2018/2019 Reporting Period	59
5.11.4 Fire Control - Activities Planned for 2019/2020 Reporting Period	59
<b>5.12 Community</b>	<b>60</b>
5.12.1 Community Engagement Activities	60
5.12.2 Community Contributions	60
5.12.3 Community Complaints	60
<b>6.0 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING</b>	<b>61</b>
<b>6.1 Environmental Management Performance Measures and Compliance</b>	<b>61</b>
<b>6.2 Reporting - Incident Reporting</b>	<b>62</b>
<b>6.3 Reporting - Annual Reporting</b>	<b>62</b>
<b>6.4 Independent Environmental Audit</b>	<b>63</b>
<b>6.5 Access to Information</b>	<b>64</b>
<b>7.0 STATEMENT OF COMMITMENTS</b>	<b>65</b>
<b>7.1 Statement of Commitments -Traffic and Transportation</b>	<b>65</b>
<b>7.2 Statement of Commitments -Air Quality</b>	<b>66</b>
<b>7.3 Statement of Commitments -Water Management</b>	<b>66</b>



<b>7.4 Statement of Commitments -Noise Management</b>	<b>67</b>
<b>7.5 Statement of Commitments -Community Relations</b>	<b>67</b>
<b>7.6 Statement of Commitments – Environmental monitoring</b>	<b>68</b>
<b>7.7 Statement of Commitments – Environmental Management System</b>	<b>68</b>
<b>7.8 Statement of Commitments – Greenhouse Gases</b>	<b>69</b>
<b>7.9 Statement of Commitments – Landscaping</b>	<b>69</b>
<b>7.10 Statement of Commitments – Flora and Fauna</b>	<b>70</b>
<b>7.11 Statement of Commitments – Waste</b>	<b>70</b>
8.0 ENVIRONMENTAL PROTECTION LICENCE 1625.....	70
<b>8.1 Other EPL Matters in the 2018/2019 Reporting Period</b>	<b>71</b>
9.0 RESULTS COMPARED TO THE ENVIRONMENTAL ASSESSMENT 2008.....	73
10.0 COMPLAINTS .....	73
11.0 CONCLUSION .....	74
<b>11.1 Appendix A: Drivers Code of Conduct Summary</b>	<b>75</b>
<b>11.2 Appendix B : Consultant Dust Data Summary</b>	<b>76</b>
<b>11.3 Appendix C: PKCT Annual Wind Summary</b>	<b>79</b>
<b>11.4 80Appendix D: LDP16 Discharge Data Summary</b>	<b>80</b>
<b>11.5 Appendix E: Weed Spraying Notification Form</b>	<b>83</b>
<b>11.6 84Appendix F: Triennial Independent Audit Findings and Action Plan84</b>	<b>84</b>
<b>11.7 Appendix G: ISO 14001 and 9001 Certificate</b>	<b>140</b>


## Table of Figures

Figure 1: Statement of compliance	9
Figure 2: Non-compliances	9
Figure 3: PKCT site boundary and surrounding land use	11
Figure 4: PKCT regional context (source; NSW Department of Planning and Environment Resources and Energy website 2017)	12
Figure 5: Early image of Port Kembla Inner Harbour. Image referenced from “Roadstead to World Class Port”, Port Centenary Committee 1999.	13
Figure 6: PKCT contacts	15
Figure 7: Actions required from the previous AEMR	15
Figure 8: Administrative conditions	16
Figure 9: Specific environmental condition overview	19
Figure 10: Summary of PKCT throughput 2018/2019	23
Figure 11: Road receipt trends	24
Figure 12: PKCT air quality monitoring sites	27
Figure 13: PKCT residential depositional dust gauges data	29
Figure 14: PKCT industrial dust deposition gauges insoluble solids 12 month rolling average.	30
Figure 15: PKCT industrial dust deposition gauges combustible matter 12 month rolling average.	30
Figure 16: PKCT contribution ratings for exceedance days during July 2018 to June 2019	31
Figure 17: Annual residential depositional dust gauge trends	32
Figure 18: Summary of depositional and continuous dust data against relevant standards	33
Figure 19: New Gantry and Windshields to improve dust control.	34
Figure 20: Newly sealed area near Road Receipt Station to limit dust generation	34
Figure 21: Completed Bulk Product Area Rectification and Resurfacing	35
Figure 22: NC1 under-pan wash down system in action	36
Figure 23 : PKCT northern continuous dust monitor	37
Figure 24 : PKCT weather station monthly monitoring data 2018/2019	38
Figure 25 : PKCT annual rainfall (financial year)	38
Figure 26 : EPL 1625 water quality parameter limits and compliance.	40
Figure 27: Water quality monitoring summary for LDP16 discharges	40
Figure 28 : PKCT monthly water use for 2018/2019 reporting period	41
Figure 29 : Trends in water EPL water quality data at LDP16	42
Figure 30 : Trends in Potable and Recycled water use at PKCT	43
Figure 31 : Sediment Markers used to manage sediment levels within the ponds.	43
Figure 32 : Berth 102 drainage sump.	44
Figure 33 : GGBF sightings at PKCT	46
Figure 34 : Shade-cloth GGBF exclusion barrier along rail corridor	47
Figure 35 : Tree Planting - Northern Road Receipt Berm (1)	49
Figure 36 : Tree Plantings – Northern Road Receipt Berm (2)	49
Figure 37 : Main Administration Building landscaped gardens	50
Figure 38 : Landscaped area near Northern Transfer Station, June 2019	50
Figure 39 : Greenhouse gas report 2018/2019	52



Figure 40 : PKCT tonnes v kWh	53
Figure 41 : PKCT energy efficiency trends	53
Figure 42: Trends in reportable energy and greenhouse gas emissions	54
Figure 43 : Project Generated Waste 2018/2019	56
Figure 44 : Waste Summary 2018/2019	56
Figure 45 : Waste Trends at PKCT	57
Figure 46: PKCT CCC Meetings	60
Figure 47 : Community Complaints Summary	61
Figure 48 : EMS compliance in the AEMR	62
Figure 49 : Environmental monitoring area and reference in AEMR	68
Figure 50 : Common Requirements of Project Approval 08_0009 and EPL1625	71
Figure 51 : PKCT and DCC complaints.	74

**1.0 Title Block**

<b>Name of Operation</b>	Port Kembla Coal Terminal Project
<b>Name of Operator</b>	Port Kembla Coal Terminal Ltd
<b>Development consent / project approval #</b>	08_0009
<b>Name of holder of development consent / project approval</b>	Port Kembla Coal Terminal Ltd
<b>Land #</b>	Lot 22 DP 1128396
<b>Name of holder of land lease</b>	NSW Ports (rented from)
<b>Environment Protection Licence #</b>	EPL 1625
<b>Planning Approval start date</b>	12 <sup>th</sup> June 2009
<b>AEMR start date</b>	1 <sup>st</sup> July 2018
<b>AEMR end date</b>	30 <sup>th</sup> June 2019
<p>I, Luke Pascot, certify that this audit report is a true and accurate record of the compliance status of Port Kembla Coal Terminal Ltd for the period 1<sup>st</sup> July 2018 to 30<sup>th</sup> June 2019 and that I am authorised to make this statement on behalf of Port Kembla Coal Terminal Ltd.</p> <p>Note.</p> <p>a) <i>The Annual Review is an 'environmental audit' for the purposes of section 122B (2) of the Environmental planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement – maximum penalty 5 years imprisonment); sections 307A, 370B and 307C (False or misleading applications/information/documents – maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
<b>Name of authorised reporting officer</b>	Luke Pascot
<b>Title of authorised reporting officer</b>	Environmental Specialist
<b>Signature of authorised reporting officer</b>	
<b>Date</b>	30/07/2019





**2.0 STATEMENT OF COMPLIANCE**

**Figure 1: Statement of compliance**

Development Approval / Licence	Compliant?
Development Approval 08_0009	Yes
EPL 1625	No

**Figure 2: Non-compliances**

Development Approval / Licence	Condition #	Condition description (Summary)	Compliance status	Comment	Where addressed in Annual Review
EPL 1625	M2.2	Air Monitoring Requirements	Non-compliant	(a) Short term data loss on continuous dust monitoring due to intermittent pump fault (b) One missed dust depositional sample due to broken sample bottle	Section 8.1 Environmental Protection Licence
EPL 1625	L2.4	Water Concentration Limits	Non-Compliant	TSS results exceeded licence limits on two occasions during heavy rain events	Section 8.1 Environmental Protection Licence

### 3.0 INTRODUCTION

#### 3.1 Purpose

The purpose of this Annual Environment Management Report (AEMR) is to provide the Department of Planning and Environment (DP&E) and other stakeholders a report of Port Kembla Coal Terminal's (PKCT's) environmental performance together with actions taken in relation to environmental control and regulatory compliance across the July 2018 to June 2019 reporting period.

#### 3.2 Scope

This AEMR provides information on PKCT's compliance with the requirements of the PKCT Major Project Approval 08\_0009 which was granted on the 12<sup>th</sup> June 2009. The approval requires PKCT to prepare an annual AEMR. By letter of 25<sup>th</sup> March 2010, The DP&E (formerly the Department of Planning and Infrastructure (DP&I)) approved a PKCT request for the submission date to be the 31<sup>st</sup> July annually to facilitate financial year reporting.

This report has been prepared with reference to the NSW Department of Planning and Environment's guideline for the post-approval requirements for State significant mining developments – Annual Review Guideline (2015).

This report will be submitted to the DP&E. Following DP&E feedback, it will be forwarded to the Environment Protection Authority (EPA) and the Department of Trade and Investment (DT&I) or as required by the respective agencies. A copy of this AEMR will also be made available to the public via the [PKCT website](#).

#### 3.3 Background

PKCT is located on Lot 22 in DP 1128396, on the northern side of the Inner Harbour of Port Kembla, Wollongong. On the 31<sup>st</sup> May 2013, NSW Ports acquired a long-term lease for Port Kembla and Port Botany through which the current leasing arrangement with PKCT remains. Land is leased to PKCT under a 20 year, plus 20 year option. The lease commenced in August 1990 and PKCT has executed this option taking the lease period to 2030.

Six equal shareholders, namely Illawarra Services Proprietary Limited (South 32), Oakbridge Proprietary Limited (Glencore), Centennial Coal Company Limited, Simec Mining, Metropolitan Collieries Proprietary Limited (Peabody) and Wollongong Coal Limited (formerly Gujarat NRE), form the Board of PKCT. South 32, reporting to the PKCT Board, manages PKCT under a management contract. PKCT is the major coal intermodal facility in southern NSW for the transfer of coal from rail and road to ship.

PKCT is responsible for receiving, assembling and loading coal from the southern and western NSW coalfields and for transport by ship to international and domestic markets, see Figure 4. PKCT has two bulk handling facilities; a high capacity Coal Berth (Berth 102) that handles the loading of coal, and a Bulk Products Berth (Berth 101) that loads and unloads a range of bulk products. See Figure 3.

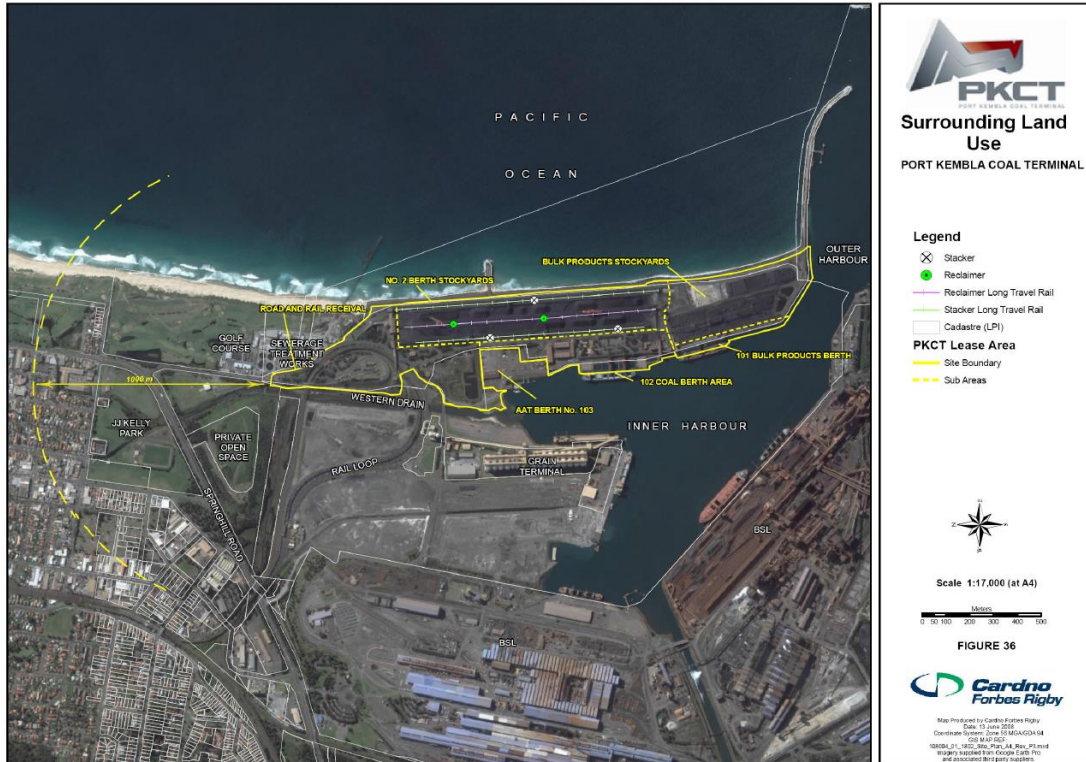


Figure 3: PKCT site boundary and surrounding land use

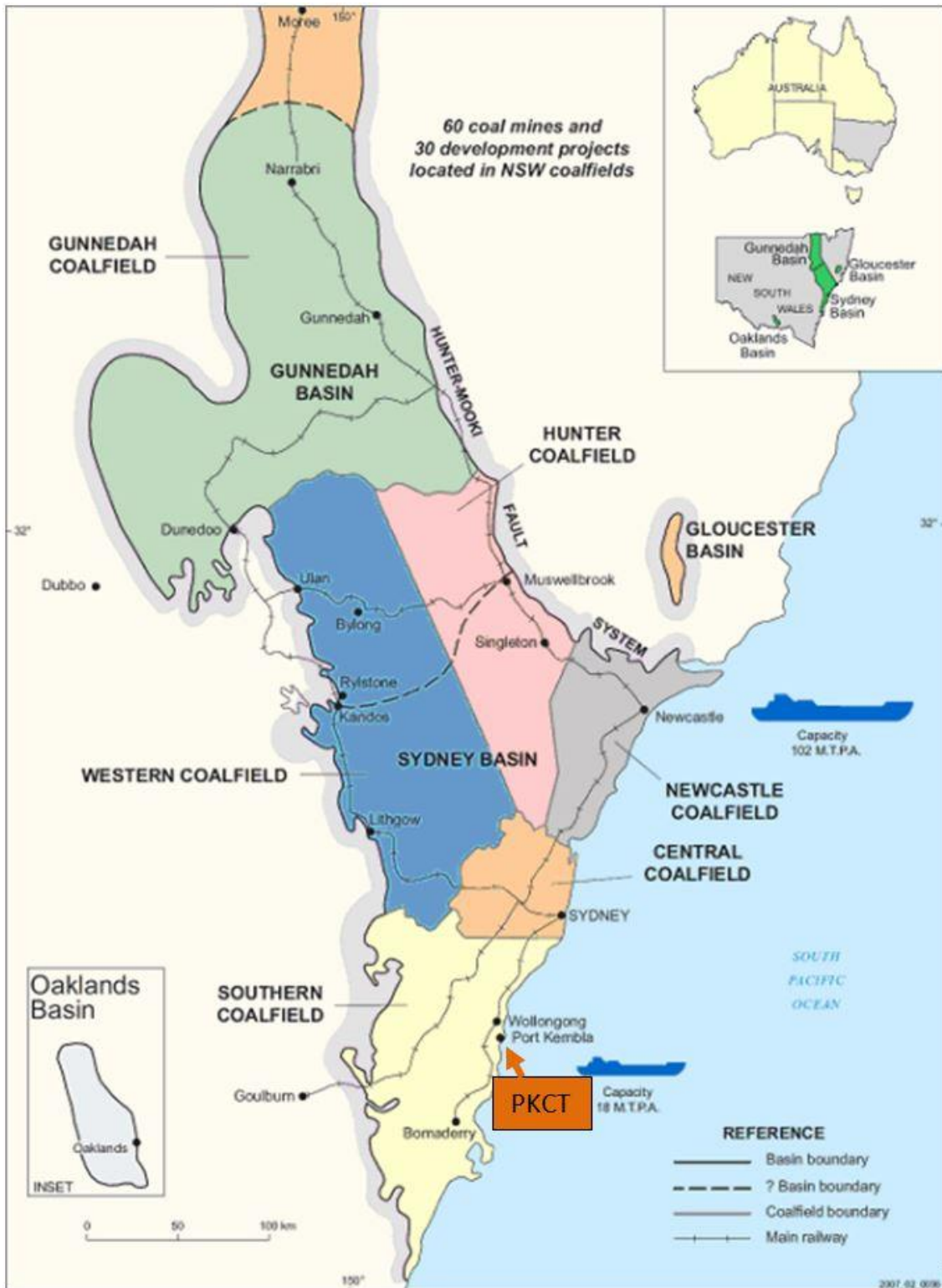
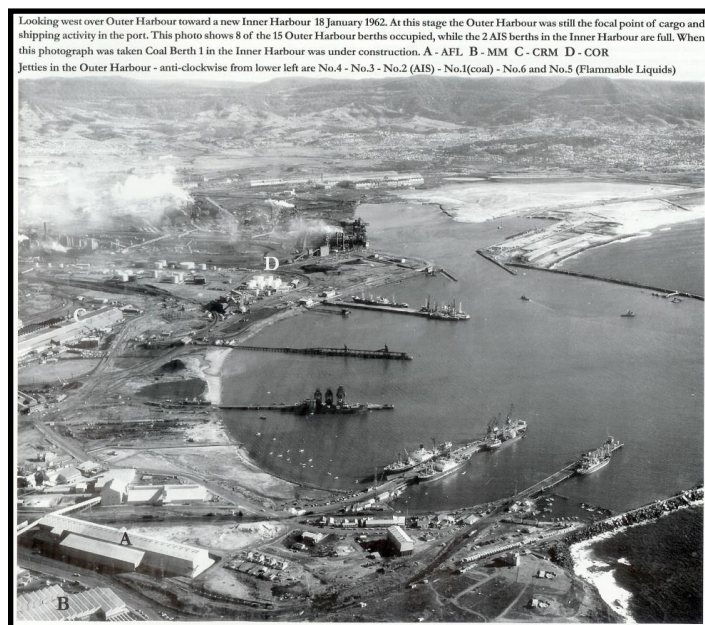


Figure 4: PKCT regional context (source; NSW Department of Planning and Environment Resources and Energy website 2017)



The Bulk Products Berth was constructed in the early 1960’s after construction of Port Kembla Inner Harbour, see Figure 5. The Coal Berth was constructed in the early 1980s.



**Figure 5: Early image of Port Kembla Inner Harbour. Image referenced from “Roadstead to World Class Port”, Port Centenary Committee 1999.**

PKCT entered the lease to operate the facility in accordance with a development consent from Wollongong City Council (WCC) and EPA Environment Protection Licence (EPL) number 1625.

In 2008, PKCT commenced preparation of a Major Project Application under Part 3A of the Environmental Planning and Assessment Act (EPAA) 1979, seeking consent to alter coal receive arrangements by public road.

Consultation with the DP&E resulted in the remit of the application with the scope being increased to include consent for PKCT’s existing operations. The Environmental Assessment (EA) submitted with the Major Project Application included an assessment of all environmental impacts associated with the current and ongoing PKCT activities.

In June 2009, the DP&E conditionally approved PKCT’s Major Project Application (08\_0009) for Existing Operations & Increased Road Receive Hours. This consent replaces the previous development approval from WCC and sets new conditions for environmental impacts, management and reporting.

### 3.4 Objectives

The objective of this AEMR is to provide a report that outlines the environmental monitoring, mitigation, assessments and management actions undertaken by PKCT over the July 2018 to June 2019 reporting period.

### 3.5 Environment Management

PKCT has an Environment Management System (EMS) in place to meet its environmental obligations. The EMS is certified to AS/NZS ISO 14001:2004 and is supported by policies, standards, an environment management strategy, management plans and procedures. Key documents of the EMS include the following:-

- [Sustainable Development Policy PO.BM.291](#)
- [Environment Policy PO.HS.85](#)
- [Quality Policy PO.BM.236](#)
- [Environment Management Strategy MP.HS.464](#)
- [Noise Management Plan MP.HS.387](#)
- [Air Quality Management Plan MP.HS.386](#)
- [Driver Code of Conduct Implementation Plan MP.BM.453](#)
- [Water Management Plan MP.HS.462](#)
- [Green and Golden Bell Frog Management Plan MP.HS.109](#)
- [Landscape Management Plan MP.HS.470](#)
- [Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461](#)
- [Waste Management Plan MP.HS.460](#)
- [Fire Management Plan MP.HS.459](#)

Policies are published on [PKCT's web site](#). Management Plans required under Project Approval 08\_0009 are also published once DP&E approval is obtained.



### 3.6 Terminal Contact

Figure 6 below identifies relevant contacts at PKCT.

PKCT Employee & Position	Contact Details
Mr. Kurt Baumgart General Manager	(02) 4221 1802 <a href="mailto:Kurt.Baumgart@pkct.com.au">Kurt.Baumgart@pkct.com.au</a>
Mr. Mark Beale Operations Superintendent	(02) 4221 1821 <a href="mailto:Mark.Beale@pkct.com.au">Mark.Beale@pkct.com.au</a>
Mr. Luke Pascot Environmental Specialist	(02) 4221 1155 <a href="mailto:Luke.Pascot@pkct.com.au">Luke.Pascot@pkct.com.au</a>
Mr Michael Curley HSER Superintendent	(02) 4221 1863 <a href="mailto:Michael.Curley@pkct.com.au">Michael.Curley@pkct.com.au</a>
Community Hotline	1800 111 448 <a href="mailto:communitylinks@pkct.com.au">communitylinks@pkct.com.au</a>

**Figure 6: PKCT contacts**

### 3.7 Actions Arising From Previous AEMR Review

The 2017/2018 AEMR was submitted to the DP&E as required in July 2018.

There was no specific feedback or improvements suggested by the DP&E following their review of the 2017/2018 AEMR submission. All actions and recommendations from previous reviews by the DP&E remain fully incorporated within the current AERM reporting structure.

Action Required from Previous AEMR	Requested by	Action taken by PKCT	Where discussed in AEMR
No actions required from the 2017/2018 Review			

**Figure 7: Actions required from the previous AEMR**

## 4.0 ADMINISTRATIVE CONDITIONS

Under Schedule 2 of PKCT’s Major Project Approval 08\_0009, PKCT has 14 Administrative Conditions. The Administrative Conditions are listed under the headings outlined in Figure 8. The following section outlines PKCT’s compliance with these across the reporting period.



Administrative Condition	AEMR Section
Obligation to Minimize Harm to the Environment	4.1
Terms of Approval	4.2
Limits on Approval	4.3
Management Plans / Monitoring Programs	4.4
Surrender of Consents	4.5
Structural Adequacy	4.6
Demolition	4.9
Operation of Plant and Equipment	4.8
Dispute Resolution	4.9

**Figure 8: Administrative conditions**

### 4.1 Obligation to minimize harm to the Environment

1. The Proponent shall implement all reasonable and feasible measures to prevent and/or minimize any harm to the environment that may result from the operation of the project.

The condition is consistent with PKCT’s policies and management standards including a commitment to meet legal and other requirements.

PKCT has in place an Environmental Aspects and Impacts Register. This document provides a framework whereby PKCT identifies, records, risk-ranks and provides controls for activities associated with the operation that have the potential to cause harm to the environment.

### 4.2 Terms of Approval

2. The Proponent shall carry out the project generally in accordance with the:
  - (a) EA;
  - (b) Response to Submissions;
  - (c) Statement of Commitments (See Appendix 2); and
  - (d) Conditions of this approval
3. If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.
4. The Proponent shall prepare revisions of any strategies, plans or programs required under this consent if directed to do so by the Director-General. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by, the Director-General.
5. The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of:
  - (a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this approval; and
  - (b) The implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.



The requirements of this condition were met across the reporting period. The Environment Management Strategy (EMS) has been developed to facilitate the means by which DP&E approval conditions are met. The AEMR provides an annual compliance report.

### 4.3 Limits on Approval

6. The Proponent shall not receive more than 7.5 million tonnes of coal and bulk products at the site by public road in any calendar year without the written approval of the Director-General. In Seeking this approval, the Proponent shall submit a report to the Director-General that:
- reviews the transport related impacts associated with the trucks being used to deliver coal and bulk products to the terminal;
  - demonstrates that these impacts are generally consistent with the predicted and/or approved impacts; and
  - examines whether there are any other reasonable and feasible measures that could be implemented to minimise these impacts.
- Once this approval has been obtained, the Proponent shall not receive more than 10 million tonnes of coal and bulk products at the site by public road in any calendar year.
7. The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been dispatched between the hours of:
- 7 am to 10 pm Monday to Friday; and
  - 8 am to 6 pm Saturday and Sunday or Public Holidays
- Unless in accordance with a project approval granted to that Colliery under Part 3A of the EP&A Act.
8. Subject to conditions 6 and 7 of this schedule, coal and bulk products may be received by the Proponent at the site by road delivery twenty four hours per day, seven days per week.

PKCT did not receive more than 7.5 million tonnes of coal and bulk products by public road during the 2018 calendar year.

With regard, Schedule 2, Condition 6, PKCT application to the Director General to receive 10 million tonnes per annum (mtpa) was approved on the 29<sup>th</sup> September 2013 subject to conditions.

### 4.4 Management Plans / Monitoring Programs

9. With approval of the Director-General, the proponent may submit any management plan or monitoring program required by this approval on a progressive basis.

The PKCT Water Management Plan, Drivers Code of Conduct and Drivers Code of Conduct Implementation Plan were revised and submitted to the DP&E in August 2014. Reviews and minor updates to the plans were undertaken during this reporting period.

### 4.5 Surrender of Consents

10. Within 12 months of the date of this approval, the Proponent shall surrender all existing development consents and existing use rights associated with operations at the site in accordance with clause 97 of the EP&A Regulation.

Applicable consents have been surrendered. No action was required in this reporting period.

#### 4.6 Structural Adequacy

11. The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.

Facilities maintenance is carried out onsite in accordance with legal and other requirements including applicable Australian Standards and the Building Code of Australia.

#### 4.7 Demolition

12. The Proponent shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.

All demolition works are planned and carried out in accordance with the PKCT's Restoration and Compliance Program and compliant with Australian Standards.

During the reporting period, PKCT completed demolition of Stacker 1, Stacker 2 and Reclaimer 1. This work saw the completion of PKCT's Major Upgrade and Restoration Project. Demolition was undertaken in line with applicable standards and the majority of scrap generated from the demolition of the machines was able to be recycled. See Section 5.9.2.2 Waste Monitoring Results and Compliance 2018/2019.

#### 4.8 Operation of Plant & Equipment

13. The Proponent shall ensure that all plant and equipment used onsite is:
  - (a) maintained in a proper and efficient condition; and
  - (b) operated in a proper efficient manner.

PKCT management and staff have a responsibility to maintain equipment to ensure correct operation and efficiency. PKCT ensures all personnel are suitably qualified, trained and competent to ensure that equipment is operated in a proper and efficient manner.

#### 4.9 Dispute Resolution

14. In the event that the Proponent and the Council or a Government agency, other than the Department, cannot agree on the specification or requirements of this approval, the matter may be referred by either party to the Director-General for resolution, whose determination of the disagreement shall be final and binding on the parties.



PKCT accepts the dispute resolution process. This condition is referenced in the PKCT Environment Management Strategy.

There were no disputes during the reporting period.

**5.0 SPECIFIC ENVIRONMENTAL CONDITIONS**

This section provides a summary of the Specific Environmental Conditions outlined in Schedule 3 of the PKCT Major Project Approval 08\_0009 and how PKCT complies with these requirements.

Figure 9 below provides an overview of each of the Specific Environmental Conditions and a reference to their location in the AEMR.

Specific Environmental Condition	AEMR Section
Noise	Section 5.1 Noise
Transport	Section 5.2 Transport
Air Quality	Section 5.3 Air Quality
Meteorological Monitoring	Section 5.4 Meteorological
Surface Water	Section 5.5 5.5 Surface <b>Water</b>
Biodiversity	Section 5.6 Biodiversity
Visual Amenity	Section 5.7 Visual Amenity
Greenhouse and Energy Efficiency	Section 5.8 Greenhouse and Energy Efficiency
Waste	Section 5.9 Waste
Hazards	Section 5.10 Hazards
Fire Control	Section 5.11 Fire Control

**Figure 9: Specific environmental condition overview**

**5.1 Noise**

**5.1.1 Noise Standards and Performance Measures**

EPL 1625 and Major Project Approval 08\_0009 pertain to noise emissions from PKCT’s premises. Noise criteria are outlined as follows;

Impact Assessment Criteria		
1. The Proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the criteria specified in Table 1 for the location nearest to that residence.		
<i>Table 1: Noise impact assessment criteria dB(A) LAeq (15 min)</i>		
Location	Time Period	Limits(LA <sub>eq,15 min</sub> dB(A))
Cnr Swan St/Kembla St	Day	51
	Evening	50
	Night	49
Cnr Swan St/ Corrimal St	Day	51
	Evening	50
	Night	49
Cnr Keira St/ Fox St	Day	55



	Evening	49
	Night	45

**Notes:**

- (a) To determine compliance with the  $LA_{eq, (15 \text{ min})}$  noise level limits in the above table, noise from the project is to be measured at the most affected point within the residential boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.
- (b) The noise emission limits identified in the above table apply under meteorological conditions of:
  - o wind speeds of up to 3 m/s at 10 metres above ground level; or
  - o temperature inversion conditions of up to 3°C/100m, plus a 2 m/s source-to-receiver component drainage flow wind at 10 metres above ground level for those receivers where applicable in accordance with the NSW Industrial Noise Policy.

However, if the Proponent has a written negotiated noise agreement with any landowner of the land listed in Table 1, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the noise limits in Table 1 in accordance with the negotiated noise agreement.

**Noise Monitoring Program**

- 2. The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:
  - (a) be developed in consultation with DECC;
  - (b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and
  - (c) include a:
    - o combination of attended and unattended noise monitoring measures;
    - o noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval; and
    - o reasonable and feasible best practice noise mitigation measures to ensure project specific noise criteria are met.

**Continuous Improvement**

- 3. The Proponent shall:
  - (a) continue to implement all reasonable and feasible best practice noise mitigation measures;
  - (b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and
  - (c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.

**5.1.2 Noise Monitoring**

**5.1.2.1 Noise Monitoring Methodology**

Biannual noise monitoring began at PKCT in September 2009. Since this time, monitoring results have been compliant with the noise monitoring criteria set out in PKCT’s EPL 1625 and Major Project Approval 08\_0009.

By-section 9.4 of PKCT’s approved Noise Management Plan, allowed that if no exceedance of the criteria occurs for 6 years, noise monitoring will not be required to continue.

In August 2016, PKCT made a formal request to the DP&E to remove the requirement for biannual noise monitoring with the intent to undertake event-based monitoring if noise concerns are raised.

By letter dated 16<sup>th</sup> March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued. Subsequently, there were no noise related complaints and PKCT undertook no noise monitoring surveys across the 2018/2019 reporting period.

#### **5.1.2.2 Noise Monitoring Results and Compliance 2018/2019**

No biannual noise monitoring campaigns were undertaken. No noise complaints were received.

#### **5.1.3 Trends in Noise Emissions**

No biannual noise monitoring campaigns were undertaken. No noise complaints were received.

#### **5.1.4 Noise –Activities undertaken during 2018/2019 Reporting Period**

A summary of the actions undertaken for the 2018/2019 reporting period relating to noise is presented below. PKCT continues to look for opportunities to improve noise levels across its operations.

- As part of the Restoration and Compliance Project, PKCT engineers have a system in place to investigate and consider best practice noise mitigation options during the design and purchase of new equipment. These processes have been utilised in recent reporting periods for major capital works including the replacement of the Stackers and Reclaimers.
- PKCT's Noise Management Plan remains a live document and is formally reviewed within the Triennial Independent Audit program.
- No noise complaints were received across the reporting period

#### **5.1.5 Noise - Activities Planned for 2019/2020 Reporting Period**

A summary of actions proposed to be undertaken in the 2019/2020 reporting period is presented below.

- PKCT will continue to undertake noise surveys if noise complaints or issues are raised.

## 5.2 Transport

### 5.2.1 Transport Standards and Performance Measures

#### Monitoring of Coal Transport

3. The Proponent shall keep records of the amount of coal and bulk products received at the site each year, and include these records in the AEMR.

#### Traffic Management

4. The Proponent shall ensure that vehicles waiting to deliver coal or bulk products to the site do not queue or park on public roads other than Port Kembla Road.

#### Driver's Code of Conduct

5. The Proponent shall, in consultation with affected mines and principal haulage operators, develop a program to implement the Driver's Code of Conduct (see Appendix 3) to the satisfaction of the Director-General. This program must:
  - (a) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General;
  - (b) include a driver induction program to cover (but not be limited to) speed limits, compression braking, truck washing, load covering and queuing on local roads; and
  - (c) include measures to ensure the Driver's Code of Conduct is enforced.

### 5.2.2 Transport Monitoring

#### 5.2.2.1 Transport Monitoring Methodology

Shippers to PKCT are signatories to the PKCT Drivers Code of Conduct (DCC). This document was developed in consultation with the PKCT road receipt customers, and their associated road transport providers, Roads and Traffic Authority (now Roads and Maritime Services), EPA, and the PKCT Community Consultative Committee (CCC).

The document outlines specific measures focusing on opportunities to minimise, mitigate and manage traffic volume, traffic safety and acoustic impacts. Among others, it specifically covers items such as haulage routes, compression braking, road delivery standards, truck washing, queuing on Springhill Road, load covering and incident management and reporting.

A Heavy Haulage Induction manual and induction program and a Drivers Code of Conduct Implementation Plan are in place to support DCC implementation.

PKCT monitors compliance against the DCC via an audit program. The monitoring of road transport operations is undertaken by PKCT personnel, by the shippers and their associated road transport providers. Audits are undertaken at the mine site, on route and at PKCT. Monthly compliance reports are supplied to PKCT. Road transport providers also undertake driver observations within their businesses.

#### 5.2.2.2 Transport Monitoring Results and Compliance 2018/2019

In accordance with Schedule 3, Condition 4, PKCT is required to keep records of the amount of coal and bulk products received at the site each year. Figure 10 below provides a summary of throughput and receipt over the reporting period.



Shiploading July 2018 to June 2019	Coal		Coke	Total
	Coking	Steaming		
Berth 101: Bulk Products Berth (Tonnes)	0	0	0	0
Berth 102: Coal Berth (Tonnes)	5,912,816	1,376,942	0	7,289,758
			<b>Total (tonnes)</b>	<b>7,289,758</b>

Receivals July 2018 to June 2019	Private Road	Public Road	Total
Road Receipt (Tonnes)	2,911,059	2,013,213	4,924,272
Rail Receipt (Tonnes)			2,496,047
		<b>Total Tonnes</b>	<b>7,420,319</b>

**Figure 10: Summary of PKCT throughput 2018/2019**

Across the 2018/2019 reporting period 822 driver observations, 80 audits and 73 Trucksafe audits were completed. Driver observations included monitoring of at least 803 individual drivers.

A summary of the auditing results is presented in Appendix A: Drivers Code of Conduct Summary.

As part of the monitoring regime, PKCT records and responds to complaints and incidents associated with coal transport to and from PKCT where required. PKCT did not receive any road transport related complaints across the reporting period, nor were any complaints reported by PKCT’s Road Transport Providers to PKCT.

**5.2.3 Trends in Transport**

Road receipt at PKCT returned to near long term average levels during the reporting period, approaching 4.92Mt of combined private and public road receipts to June 2019, Figure 11.



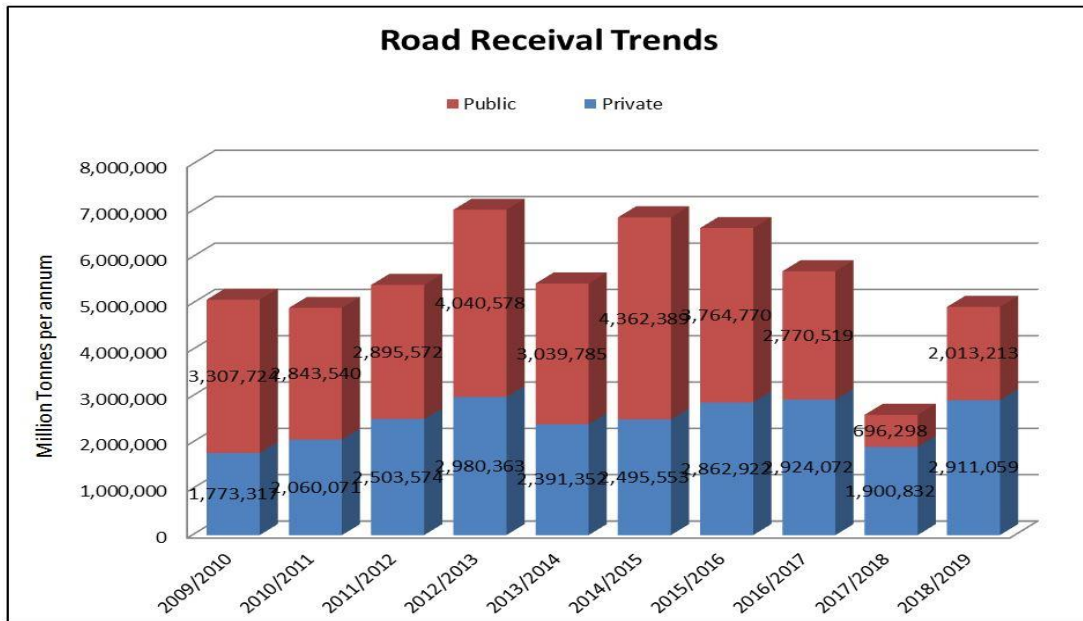


Figure 11: Road receival trends

**5.2.4 Traffic –Activities Undertaken During 2018/2019 Reporting Period**

A summary of the actions undertaken for the 2018/2019 reporting period related to traffic is presented below.

- This year PKCT have completed significant upgrades to the Road Receival System including additional cameras to monitor truck movements in the road receival area. Upgraded washing process checks are also in place, including additional truck wash-down bays and waterproof television screens to allow drivers to monitor their cleaning progress without needing to get out of the truck.
- PKCT have improved the driver induction system to provide a ‘one on one’ Driver’s Code of Conduct induction with every truck driver in addition to the existing Induction package provided by the truck company and mines. Overall, there are now more controls within PKCT systems to ensure compliance to the Driver’s Code of Conduct.
- Routine task observations and audits have continued, focussing on compliance against the Driver’s Code of Conduct and PKCT’s approval conditions.

**5.2.5 Traffic - Activities Planned for 2019/2020 Reporting Period**

A summary of the planned actions for the 2019/2020 reporting period related to Traffic is presented below.

- Continue to undertake additional training and routine Driver’s Code of Conduct auditing.





- Complete upgrades to the road receival area to enhance driver safety and improve environmental performance.

### 5.3 Air Quality

#### 5.3.1 Air Quality Standards and Performance Measures

EPL 1625 and Major Project Approval 08-0009 pertain to air quality and emissions from PKCT’s premises. Air quality criteria are outlined as follows;

#### Impact Assessment Criteria

7. The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 3 to 5 at any residence.

*Table 3: Long term impact assessment criteria for particulate matter*

Pollutant	Averaging Period	Criterion
Total suspended particulate (TSP) matter	Annual	90 µg/m <sup>3</sup>
Particulate matter < 10 µm (PM10)	Annual	30 µg/m <sup>3</sup>

*Table 4: Short term impact assessment criteria for particulate matter*

Pollutant	Averaging Period	Criterion
Particulate matter < 10 µm (PM10)	24 hour	50 µg/m <sup>3</sup>

*Table 5: Long term impact assessment criteria for deposited dust*

Pollutant	Averaging Period	Maximum Increase in Deposited Dust Level	Maximum Total Deposited Dust Level
Deposited Dust	Annual	2 g/m <sup>2</sup> /month	4 g/m <sup>2</sup> /month

*Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS 3580.10.1-1991: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.*

However, if the Proponent has a written negotiated air quality agreement with any landowner to exceed the air quality limits in Table 3, 4 and/or 5, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the air limits in Table 3, 4 and/or 5 in accordance with the negotiated air quality agreement.

#### Operations

8. The Proponent shall:
- ensure any visible air pollution generated by the project is both minimised and recorded, and that operations are modified as required to minimise any resultant air quality impacts on nearby residences;
  - ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and
  - where dust is generated by the project, that operations are modified and/or stopped as required to ensure compliance with the relevant air quality criteria to the satisfaction of the Director-General.
9. During carrying out of the project, the Proponent shall ensure that:
- all loaded trucks entering or leaving the site have their loads covered; and
  - trucks associated with the project pass through a truck wash before entering the public road network to the satisfaction of the Director-General.

#### Air Quality Monitoring Program

10. The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must:
- be developed in consultation with DECC;
  - be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and
  - include:
    - real-time sampling to monitor the dust emissions of the project;
    - an air quality monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this approval; and
    - reasonable and feasible best practice emissions mitigation measures to ensure project specific assessment criteria are met.

### 5.3.2 Air Quality Monitoring and Compliance

#### 5.3.2.1 Air Quality Monitoring Methodology

PKCT has an Air Quality Management Plan (AQMP) in place and is operational as follows;

- The AQMP, developed in consultation with the EPA, was submitted to DP&E by the due date of 9<sup>th</sup> December 2009. The DP&E approved the AQMP by letter of 25<sup>th</sup> March 2010.
- The EPA assisted in developing the AQMP though did not add any new air quality criteria to EPL 1625. In the 2014 EPL review, the EPA included new obligations on PKCT to report on continuous dust against the DP&E Impact Assessment Criteria and this commenced in the 2014/15 EPL Annual Return.
- PKCT's AQMP contains dust monitoring, assessment, reporting and mitigation and management provisions to ensure necessary actions are undertaken and that dust from PKCT's premises does not exceed the criteria in the Impact Assessment Criteria outlined above.
- PKCT provides 24/7 site operational control via the Main Control Room (MCR). MCR operators monitor site conditions and weather forecasts. If dust is observed, action is taken through the operation of sprays or other available controls. Dust events observed which emanate beyond the immediate source with a potential to have off site impacts are entered into PKCT's event management system, requiring investigation and corrective action. PKCT also has an auditing process in place which includes site observations of dust, dust associated with truck movements and the assessment of associated controls.
- PKCT has a total of 14 depositional dust gauges (11 Industrial and 3 residential) located on site and on adjacent port and residential areas, and two continuous dust monitors located to the north and south of the site, see Figure 12 below. These locations are specified in the EPL and Project Approval 08\_0009. Dust Samples from each dust deposition gauge are collected on a monthly basis by an environmental contractor and sample analysis is performed at a NATA accredited laboratory. Results from the

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AUTHORISED BY Kurt Baumgart, General Manager

Date Authorised: 30.7.19

residential depositional gauges are analysed on a monthly basis and compared to the EPA amenity criteria of 4 grams/m<sup>2</sup>/month. The results are reported on the [PKCT website](#).

PORT KEMBLA COAL TERMINAL  
DUST & WEATHER MONITOR LOCATIONS

30<sup>th</sup> October 2012



EPL No.	PKCT No.	Dust Monitor Location Description
1	P1	25m south of Bulk Products Berth (BPB)
2	P2	40m south of Bulk Products Berth stockyard
3	P3	40m east of Bulk Products Berth stockyard
4	P4	40m east Coal Berth stockyard
5	P5	Northern Pond (Pond No.1)
6	P6	40m west Coal Berth stockyard
7	P7	250m west of Coal Berth stockyard
8	P8	PKCT north truckwash
9	P9	Wollongong Wastewater Treatment Plant
15	P10	North of PKCT Planning Office
17	P11	Entry Gate to BlueScope Ro Ro (Berth 109)
12	R1	157 Church Street (two gauges)
19	R2	Vikings Oval, Wollongong (two gauges)
TBA	R3	Linkside Apartments, Ross Street
	C1	Continuous Dust Monitor 1
	C2	Continuous Dust Monitor 2

- # refer PKCT Environment Protection Licence(EPL) No. 1625 (EPA ID No.)
- Dust Gauges- Environment Protection Licence monitoring sites  
Sites denoted "P": industrial; "R": residential
- Continuous Dust Monitor Sites- additional
- (a) BlueScope High Volume Sampler & dust gauge  
(b) PKCT EPL Monitoring Site R2 (2 gauges)
- Weather stations
- (a) at each continuous dust monitor site ●
- (b) PKCT Main Control Room ●

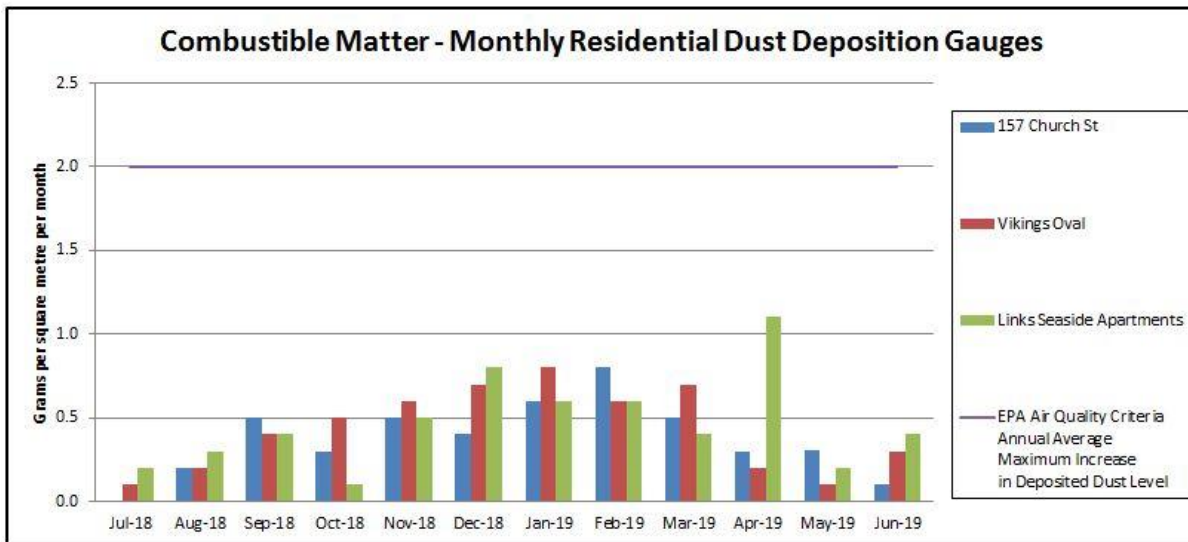
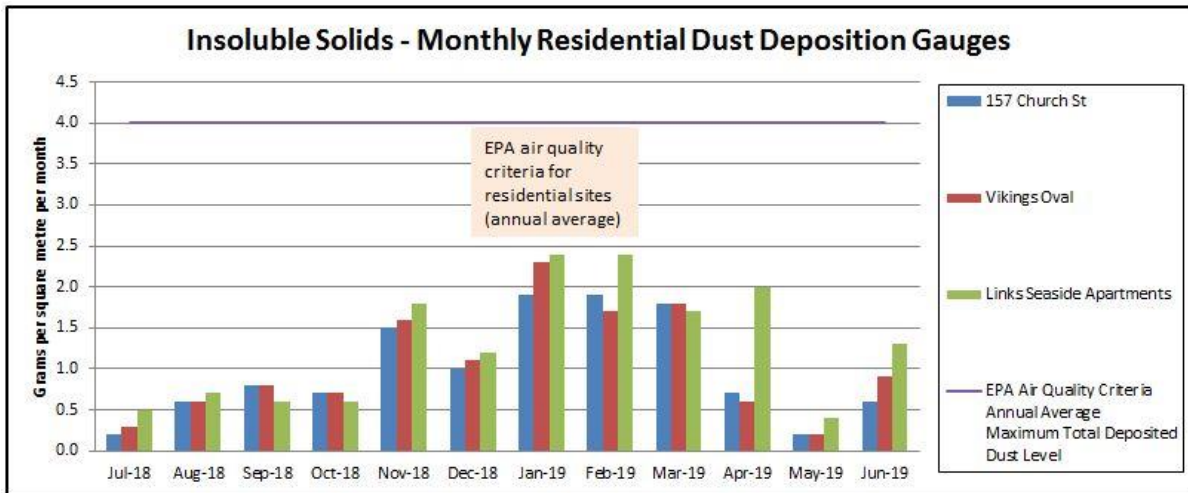
**Figure 12: PKCT air quality monitoring sites**

**5.3.2.2 Air Quality Monitoring Results and Compliance 2018/2019**

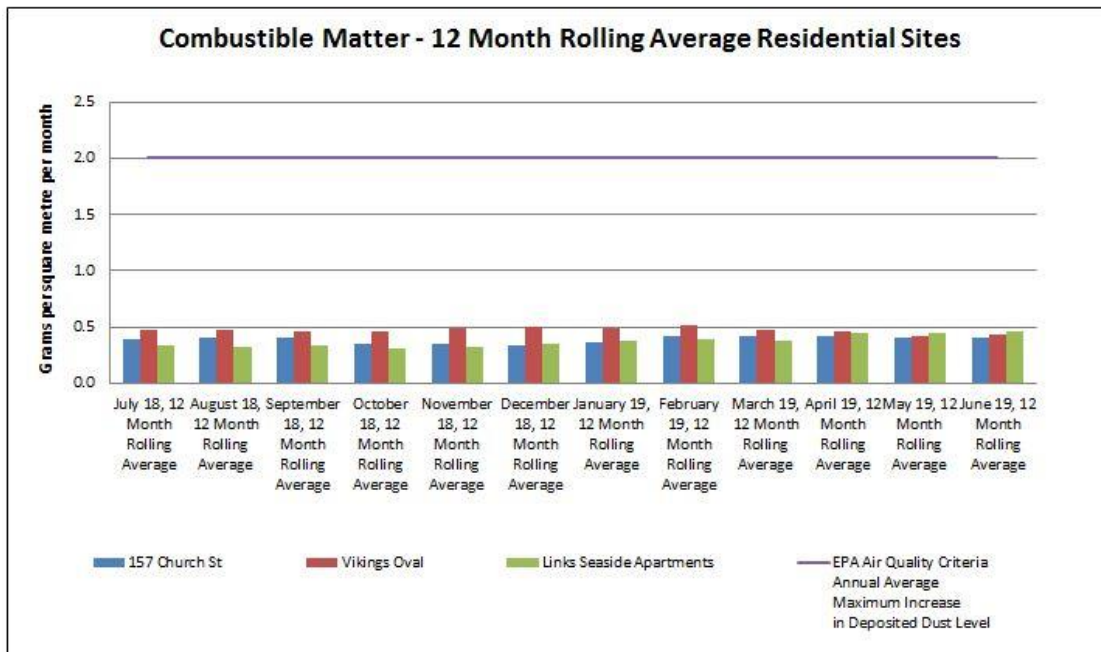
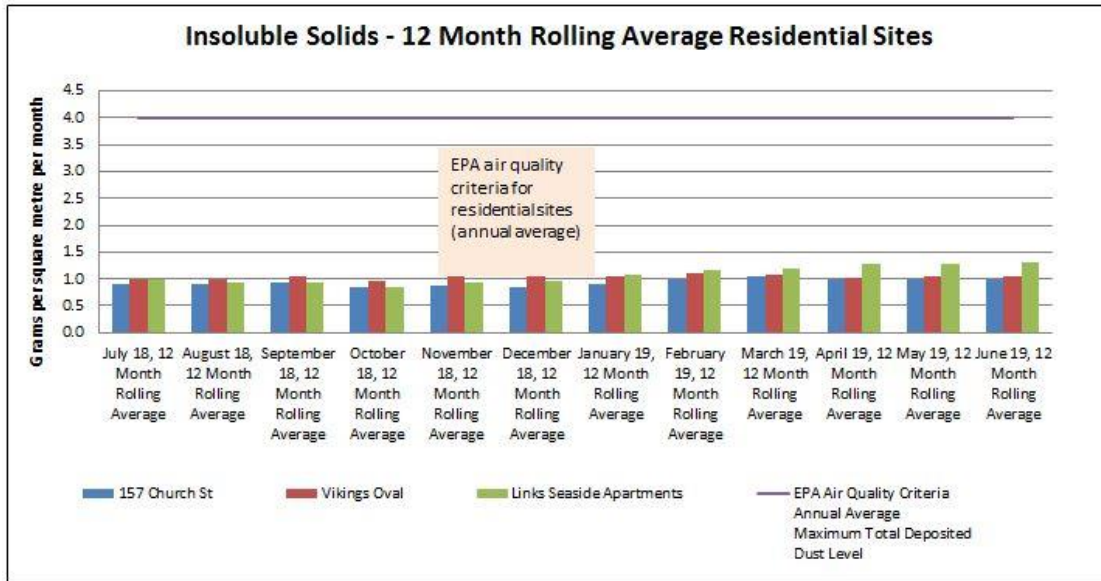
PKCT collects monthly depositional dust records at three residential sites and 11 industrial sites located on or near the PKCT premises.

Across the reporting period, there were no results where a residential gauge exceeded the Combustible Matter or Insoluble Solids criteria of 2 g/m<sup>2</sup>/month for that month. Likewise, results are within the 12-month rolling average criteria set in the Planning Approval for both Insoluble Solids and Combustible Matter. These results are compliant with the Planning Approval criteria. Monthly dust deposition results for the three residential dust gauges are presented in Figure 13 below.

Twelve month rolling average Insoluble Solids and Combustible Matter results for the 11 PKCT industrial dust gauges are also presented below in Figure 14 and Figure 15.







**Figure 13: PKCT residential depositional dust gauges data**

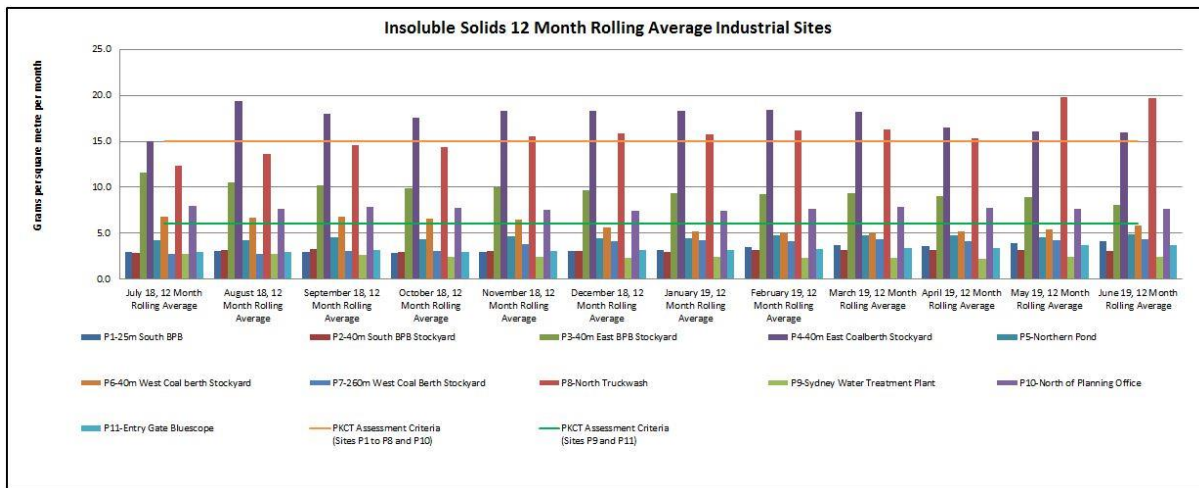
PKCT utilises eleven Industrial Deposition Gauges around site to assist with managing dust. The results are not used for compliance purposes, however, operational criteria are used to monitor and track deposition trends. A summary of these industrial deposition results is presented below.

Ten of eleven Industrial sites were within the 12-month rolling average criteria for Combustible Matter. Combustible Matter is typically an indicator of coal in a sample. One site, “P8 – Northern Truckwash” was slightly outside the 12-month rolling average criteria of 12 g/m<sup>2</sup>/month of Combustible Matter as a result of high readings early in the reporting period increasing the annual average for the remainder of the year. PKCT has undertaken significant work at the road receival area including improved washing processes, increasing

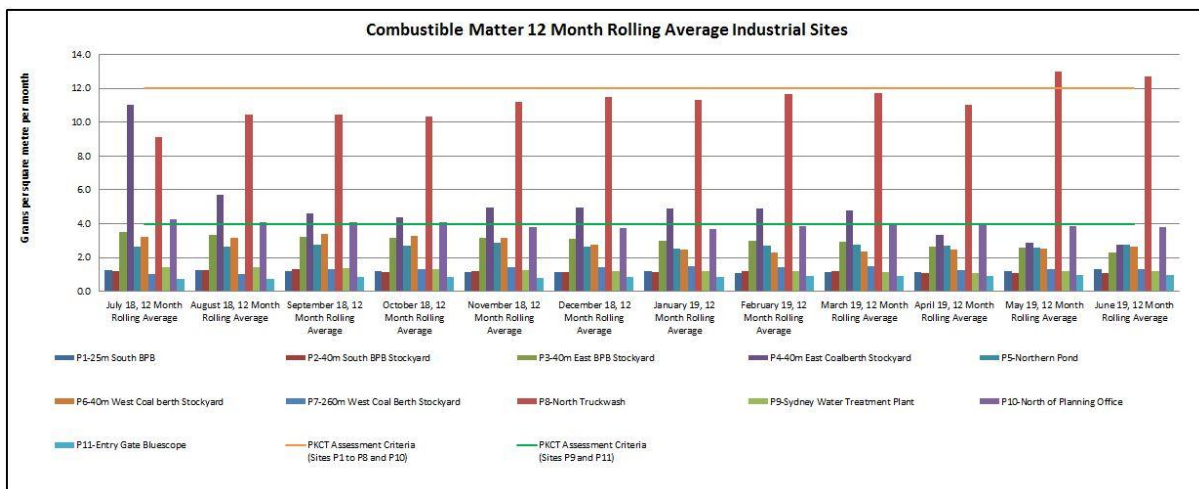


the areas of hardstand around the facility and planting of 600 trees on the western berm wall. These improvements will assist in reducing dust generation from the area in the future.

Nine of eleven Industrial sites were within the 12-month rolling average criteria for Insoluble Solids. Insoluble Solids are more likely associated with dust sources other than coal such as slag, sand, dirt etc. Two sites, “P8 – Northern Truckwash” and “P4 – 40m east of coal berth stockyard” were slightly outside the 12 month rolling average criteria of 15 g/m<sup>2</sup>/month Insoluble Solids. As discussed above, there has been significant improvement works undertaken around “P8 – Northern Truckwash” to improve dust management in the area, while a single uncharacteristic high reading early in the reporting period skewed the 12 month rolling average result for “P4 – 40m east of coal berth stockyard”. There have been significant consolidation and clean-up work undertaken around “P4 – 40m east of coal berth stockyard” which may have caused the single uncharacteristic data spike.



**Figure 14: PKCT industrial dust deposition gauges insoluble solids 12 month rolling average.**



**Figure 15: PKCT industrial dust deposition gauges combustible matter 12 month rolling average.**



PKCT has two continuous dust monitors. One monitor is located at the southern end of PKCT’s premises. The other monitor is located north of PKCT’s premises, midway to the residential boundary. Data from these monitors is captured and analysed by specialist air quality consultants for PKCT. Data and exceedances related to the northern monitor are presented with wind data in 11.2 Appendix B : Consultant Dust Data Summary and in Figure 16 below. A summary of the air quality data at the northern dust monitor from PKCT’s Air Quality consultant is provided below.

The annual average TSP concentration of 31.1 µg/m<sup>3</sup> at the PKCT northern monitoring site was below the air quality criterion of 90 µg/m<sup>3</sup>.

The annual average PM10 concentration of 22.0 µg/m<sup>3</sup> at the PKCT northern monitoring site was below the air quality criterion of 30 µg/m<sup>3</sup>.

At the northern PKCT monitoring site the trigger level of 90 µg/m<sup>3</sup> for the 24-hour average TSP concentration was exceeded on 15 occasions, while the 24-hour average PM10 air quality standard of 50 µg/m<sup>3</sup> was exceeded on 28 occasions. Each TSP exceedance day was also a PM10 exceedance day.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to all 15 of the 24-hour average TSP trigger level at the PKCT northern monitoring site.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to all 28 exceedances of the 24-hour average PM10 standard at the PKCT northern monitoring site.

PKCT contribution rating	Number of TSP exceedance days	Number of PM <sub>10</sub> exceedance days
None	3	7
Minimal (0% to 10%)	6	15
Minor (10% to 30%)	2	2
Moderate (30% to 70%)	0	0
Major (70% to 100%)	0	0
Unclassified (missing data)	4	4
<b>Total exceedance days</b>	<b>15</b>	<b>28</b>

**Figure 16: PKCT contribution ratings for exceedance days during July 2018 to June 2019**

On average, PKCT was estimated to have contributed 5% to TSP levels at the PKCT northern monitoring site on days when exceedances of the TSP trigger level occurred.

On average, PKCT was estimated to have contributed 2% to PM10 levels at the PKCT northern monitoring site on days when exceedances of the PM10 standard occurred.



**5.3.3 Trends in Air Quality**

Comparative data for the PKCT residential depositional dust gauges is presented in Figure 17 below. Each year, 12 samples are collected at each gauge. As is shown in the Figure, the number of exceedances occurring across each year is low and no adverse trend is apparent in the current data set. It is noted that with only occasional monthly dust levels exceeding the DP&E criteria, the annual average levels are well within the DP&E criteria. Additionally, the occasional exceedances that are identified within the residential gauges once secondary analysed are typically not associated with dust generation from PKCT (insect remains, plant matter clays etc.).

Residential Air Quality Criteria Number of Exceedances - Insoluble Solids									
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019
Links Seaside Apartments	Criteria 4 g/m <sup>2</sup> /month	0	0	1	0	0	0	0	0
Vikings Oval	Criteria 4 g/m <sup>2</sup> /month	0	2	0	0	1	1	0	0
157 Church Street	Criteria 4 g/m <sup>2</sup> /month	0	0	0	0	1	0	0	0

Residential Air Quality Criteria Number of Exceedances -Combustible Matter									
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019
Links Seaside Apartments	Criteria 2 g/m <sup>2</sup> /month	0	0	0	0	1	0	0	0
Vikings Oval	Criteria 2 g/m <sup>2</sup> /month	0	2	0	0	2	1	0	0
157 Church Street	Criteria 2 g/m <sup>2</sup> /month	0	0	0	0	1	0	0	0

**Figure 17: Annual residential depositional dust gauge trends**

A summary of the 2018/2019 depositional and continuous dust gauge data compared to historical records is presented below in Figure 18.

PKCT’s Environmental Assessment on Air Quality undertaken in 2008 predicted that impacts to air quality from PKCT would be well below relevant DECC criteria based on existing PKCT operations and the proposal to receive coal by road over a 24/7 period up to a maximum of 10mtpa. Annual average results for the three residential depositional dust gauges show that for both total insoluble solids and for combustible matter, levels are well within the DECC guidelines on all occasions, see Figure 13. This aligns with the predictions in the Environmental Assessment.

Annual average results for TSP and PM<sub>10</sub> recorded at the continuous dust gauges are within the relevant DECC guidelines on all occasions except for the PM<sub>10</sub> annual average in FY2012/2013, and marginally in FY2014/2015 and FY2015/2016, see Figure 18. Both TSP and PM<sub>10</sub> were within the criteria for the 2018/2019 reporting period. The continuous dust monitors used to record this information cannot discern where the dust source is from, however the data is analysed by a consultant on behalf of PKCT and assesses the likely contribution by PKCT to the results.

PKCT continues to utilise the collected data to minimise and manage dust from its operations.





Location	Standard	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
		Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average
<b>Residential Depositional Gauges</b>										
Total Insoluble Solids										
Vikings Oval (d)	4 g/m <sup>2</sup> month	1.4	1.4	1.6*	1.2	1.1	2.6	1.6	1.0	1.1
Church Street (d)	4 g/m <sup>2</sup> month	3.5	1.5	1.3	1.6	1.1	1.8	1.2	1.0	1.0
Ross Street (d)	4 g/m <sup>2</sup> month	-	1.6	1.4	1.4	1.1	1.4	1.6	1.0	1.3
Combustible Matter										
Vikings Oval (d)	2 g/m <sup>2</sup> month	0.8	0.8	0.8*	0.7	0.8	1.7	0.8	0.5	0.4
Church Street (d)	2 g/m <sup>2</sup> month	0.8	0.6	0.6	0.6	0.6	1.2	0.6	0.4	0.4
Ross Street (d)	2 g/m <sup>2</sup> month	-	0.8	0.6	0.7	0.6	0.8	0.8	0.3	0.5
<b>Continuous Dust Monitor</b>										
TSP										
Northern ( c)	90 ug/m <sup>3</sup>	32.2	34	62	44.3	45.8	48.3	40.8	34.6	31.1
PM10										
Northern ( c)	30 ug/m <sup>3</sup>	25.8	27	47	24.8	30.8	31.6	28.1	24.4	22.0

Data for FY 2013 (July 2012 and January 2013) has been omitted for the residential depositional gauge at Vikings Oval. The results received were well outside normal values for this location. Subsequent petrographic analysis confirmed that the main constituents of the sample were plant matter and not related to PKCT operations.

**Figure 18: Summary of depositional and continuous dust data against relevant standards**

### 5.3.4 Air Quality –Activities Undertaken During 2018/2019 Reporting Period

A summary of the actions undertaken for the 2018/2019 reporting period related to Air Quality is presented below.

- PKCT has completed a suite of specific dust management Environmental Improvement Programs associated with its EPL during the reporting period. A summary of each of these is provided below;
  - PKCT undertook a complete audit of its windshields along the conveyor systems and identified areas of improvement to the windshields and gantries along NC8, the eastern-most conveyor. PKCT has subsequently implemented a program of repairing windshields where required.

Where excessive corrosion has occurred, PKCT has re-designed the gantry structure and has engaged a fabrication company to build the new improved gantries. Installation of some new gantries has occurred and further new gantries and windshields will be progressively installed across the coming reporting period. The new design will last longer and subsequently improve dust reduction. See Figure 19: New Gantry and Windshields to improve dust control. below.



**Figure 19: New Gantry and Windshields to improve dust control.**

- Ship-loader 2 (SL2) Launder and Washdown Improvement Project – This project involved a series of changes that were implemented in 2019 involving extensive alterations to the pipework, launders and sparging lines of this major unit. These modifications contributing to improvements in operating pressures and efficiency in the washdown process, and ultimately contribute to reduced dust generation from the plant.
- Hard-stand area improvements – PKCT has re-sealed an unsealed area prone to dust generation at the Road Receiving area during the reporting period. See Figure 20 below.



**Figure 20: Newly sealed area near Road Receiving Station to limit dust generation**

- EIP U4 “Review Inbound Moisture Meters” - PKCT has reviewed the existing inbound rail moisture measure unit and developed a timeline to calibrate and incorporate the moisture meter into PKCT control system. In addition to this project, PKCT is investigating the viability of installing an additional moisture meter into the road receival system. When implemented, both moisture meters will assist PKCT in understanding the inbound moisture levels of coal through both road and rail.
- As part of the site rectification works following PKCT’s Restoration and Compliance Project, PKCT is consolidating and surface profiling the eastern side of the Bulk Products storage area. This project was completed during the reporting period with improvements to the area including drainage upgrades, erosion control features and a two-coat sealing process designed to reduce dust generation. Additionally, the fill was utilised on site and redirected from being taken to landfill as a waste product. Progress of the site rectification work is shown below in Figure 21: Completed Bulk Product Area Rectification and Resurfacing.



**Figure 21: Completed Bulk Product Area Rectification and Resurfacing**

- Modified return scraper on conveyors NC1 and NC13. Historically, through normal operations, coal fines would build up under PKCT’s Return Scraper on conveyors NC1 and NC13 causing cleaning, maintenance and dust issues. A solution was implemented during the previous reporting period where-by an under-pan was installed beneath the v-scraper of NC1. The under-pan has an incorporated spray bar and automated wash cycle which washes spillage into a sump to be later removed by PKCT’s automated pumping system, see Figure 22 below. With the improvements made, the cleaning cycle has been extended and the volume of coal fine build-up has significantly declined. The success of this improvement has led to the design and procurement of a similar system for

conveyor NC13, and these modifications are expected to be implemented during the 2019/2020 reporting period.



**Figure 22: NC1 under-pan wash down system in action**

### 5.3.5 Air Quality - Activities Planned for 2019/2020 Reporting Period

A summary of the planned actions during the 2019/2020 reporting period related to air quality is presented below.

- PKCT has made a commitment to review the feasibility of a proposed “Dust Monitoring Improvement Project”. The project may involve a potential upgrade of the existing real time dust monitors, integration of the new equipment into the existing site monitoring system and inclusion of a weather monitoring service to assist with predictive data. The Project’s feasibility will then be considered within the following business planning cycle.
- Reclaimed spillage coal from pond and sump cleaning processes has been stored on the Southern Pads of PKCT for drying and screening purposes. The area is open, stockpiles are exposed to windshear and the area requires careful management to prevent dust lift off. PKCT has progressively moved new spillage coal to the northern end of the main stockyard, and during the coming reporting period will be undertaking an Engineering Project to purpose build a shielded storage facility to assist in managing and storage of spillage coal
- PKCT will continue to work on improving the effectiveness of its existing dust mitigation infrastructure and will continue the work already undertaken with expert consultants on this matter.



## 5.4 Meteorological

### 5.4.1 Meteorological Monitoring Standards and Performance Measures

11. During the life of the project, the Proponent shall ensure that there is a suitable meteorological station on or in the vicinity of the site that generally complies with the requirements in the *Approved Methods for Sampling of Air Pollutants in New South Wales* guideline.

### 5.4.2 Meteorological Monitoring

#### 5.4.2.1 Meteorological Monitoring Methodology

PKCT primarily utilises an on-site weather station to measure, monitor and record weather variables. The station measures wind speed and direction, rainfall, air pressure, temperature and humidity continuously at the site.

Additionally, PKCT operates two continuous dust monitors which measure PM10, PM2.5, TSP, wind speed and wind direction, see Figure 23 : below.



**Figure 23 : PKCT northern continuous dust monitor**

Data from the monitoring stations is used by PKCT personnel to assist with environmental management on site.

#### 5.4.2.2 Meteorological Monitoring Results and Compliance 2018/2019

A summary of the rainfall data recorded at PKCT across the 2018/2019 reporting period is presented below in Figure 24 and Figure 25 . An annual wind summary from the northern and southern continuous dust monitors is presented in Appendix C.



Year/Month	Rainfall (mm)
Jul-18	3.4
Aug-18	18.2
Sep-18	35.8
Oct-18	95
Nov-18	82.6
Dec-18	80.6
Jan-19	62
Feb-19	42.8
Mar-19	162
Apr-19	49.8
May-19	4.6
Jun-19	93.8

Figure 24 : PKCT weather station monthly monitoring data 2018/2019

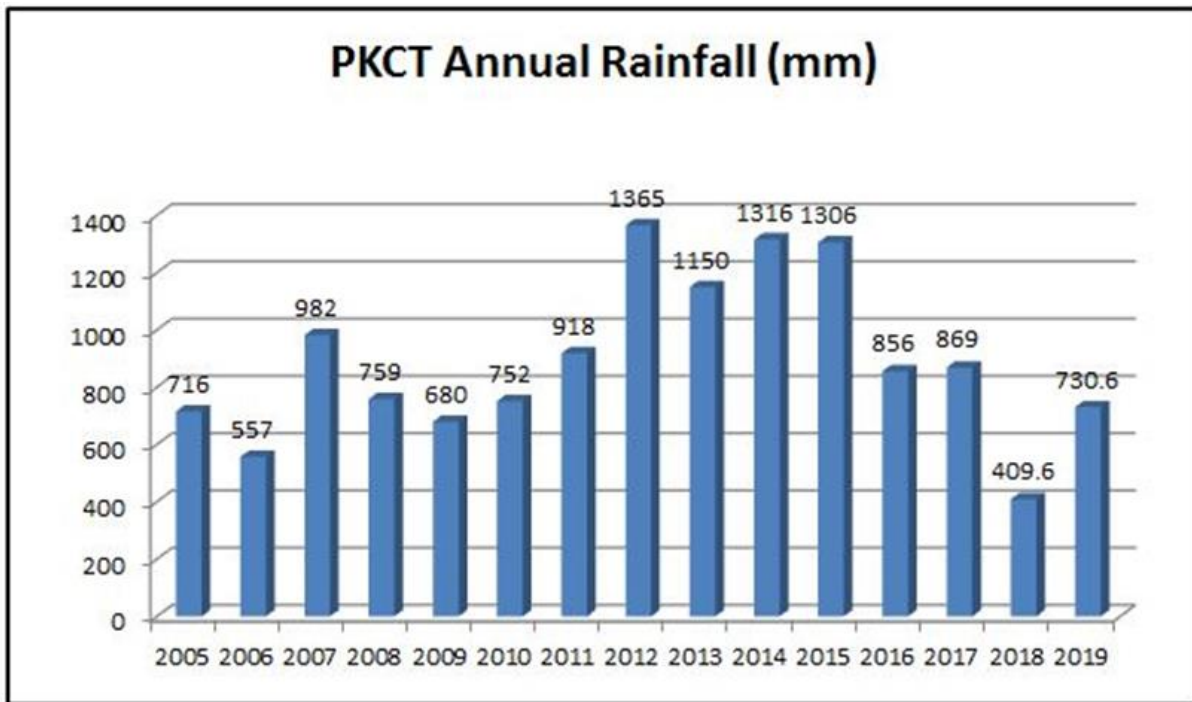


Figure 25 : PKCT annual rainfall (financial year)

**5.4.3 Trends in Weather**

As is shown in Figure 25 above, the 2018/2019 reporting period saw a return to near average rainfall levels for the site, with 730.6 mm recorded during the financial year (site average for the past 15 years is 831 mm/year).

## 5.5 Surface Water

### 5.5.1 Surface Water Standards and Performance Measures

EPL 1625 and Major Project Approval 08-0009 pertain to water quality and discharge limits from PKCT's premises. Water quality criteria are outlined as follows;

#### Discharge Limits

12. Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the *Protection of the Environment Operations Act 1997*.

#### Water Management Plan

13. The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director-General. This Plan must:

- (a) be prepared in consultation with DECC;
- (b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and
- (c) include:
  - a site water balance, which includes details of sources of water supply, on-site water use and management and off-site water discharges and investigates and describes measures to minimise water use by the project;
  - a sediment control plan for surface works on the site that is consistent with the requirements of the *Managing Urban Stormwater: Soils and Construction Manual* (Landcom 2004, or its latest version);
  - a surface water monitoring program that includes:
    - stormwater effluent discharge criteria;
    - a monitoring protocol for evaluating compliance with the stormwater effluent discharge criteria; and
    - reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met.

### 5.5.2 Surface Water Monitoring

#### 5.5.2.1 Surface Water Monitoring Methodology

PKCT has a Water Management Plan MP.HS.462 (WMP) which is in operation and DP&E approved. This plan was submitted to the DP&E within 12 months of Project Approval 08\_0009.

This Plan outlines the processes operating currently with regard to water monitoring, assessment, reporting, mitigation and management provisions to ensure necessary actions are undertaken in accordance with DP&E approval conditions.

The WMP includes reference to PKCT's Water Savings Action Plan (WSAP). This Plan has been in place since 2006. PKCT has now met its regulatory obligations and no further reporting is required.

PKCT also operates under EPL 1625. Under this licence, PKCT is required to measure water quality at its Licenced Discharge Point 16 (LDP16). Daily grab samples are taken from LDP16 when harbour discharges occur.



On a monthly basis, PKCT collates and reviews water usage across the site and discharge water quality. LDP16 discharge monitoring data is uploaded to the [PKCT website](#) as required under Schedule 4, Condition 9 of Project Approval 08\_0009.

In September 2014, PKCT completed a five-yearly review of EPL 1625 with the EPA. Related to water monitoring, the review process added an additional monitoring requirement to sample overflows from PKCT’s satellite ponds and to report the data via the Annual Return process. PKCT’s pH limits for LDP16 were removed and replaced with a monitoring and reporting requirement and LDP16’s Oil and Grease limit was removed and changed to a “visible/not visible” reporting requirement.

**5.5.2.2 Surface Water Monitoring Results 2017/2018**

PKCT’s licence conditions and limits for LDP16 are presented below in Figure 26

Monitoring Parameter	100 percentile limits
pH	Monitoring only
TSS	50 mg/litre
Oil and Grease	Visible

**Figure 26 : EPL 1625 water quality parameter limits and compliance.**

Across the FY2018/2019 reporting period, PKCT recorded a total of 86 discharges from LDP16. Of these discharges, 98% were compliant for TSS and 100% were compliant for Oil and Grease. pH was monitored as required, see Figure 27 below. A summary of all LDP16 discharge monitoring data is presented in Appendix D: LDP16 Discharge Data Summary.

Monitoring Parameter	Number of Overflows	Maximum recorded value	Minimum recorded value	Mean recorded value	Compliant Samples (%)
pH	86	10.8	7.0	8.9	n/a
TSS (mg/l)	86	97	<5	18.4	98
Oil and Grease (mg/l)	86	6	<5	<5	100

**Figure 27: Water quality monitoring summary for LDP16 discharges**

PKCT monitors water usage across the site on a monthly basis. A summary of the water usage for the site compared to the WSAP is presented below in Figure 28.



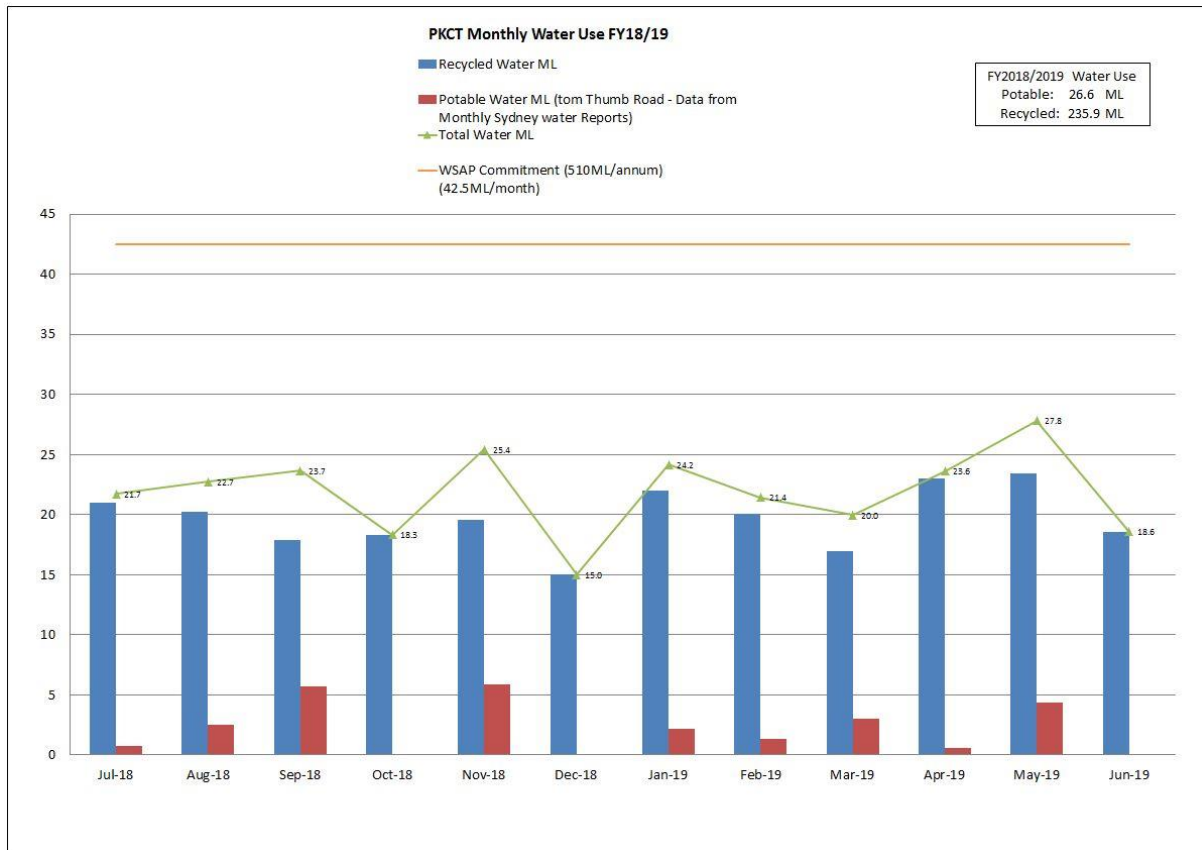


Figure 28 : PKCT monthly water use for 2018/2019 reporting period

5.5.2.3 Surface Water Monitoring Compliance

Of the 86 discharges from LDP16 recorded during the 2018/2019 reporting period, PKCT was compliant for 86 (100%) Oil and Grease samples and 84 (98%) TSS samples, and pH was monitored on all 86 overflow occasions as required.

These figures reflect two non-compliant TSS discharges during the reporting period. The discharges were the first non-compliant discharges since May 2015. Both discharges occurred during heavy rainfall events and receiving waters were highly turbid during both discharges. No environmental harm was considered likely as a result and the discharges were not considered “Material”. As a result, PKCT’s Pollution Incident Response Management Plan was not activated. PKCT self-reported both events to the EPA. Refer to Section 8.1 for details of the non-compliances.

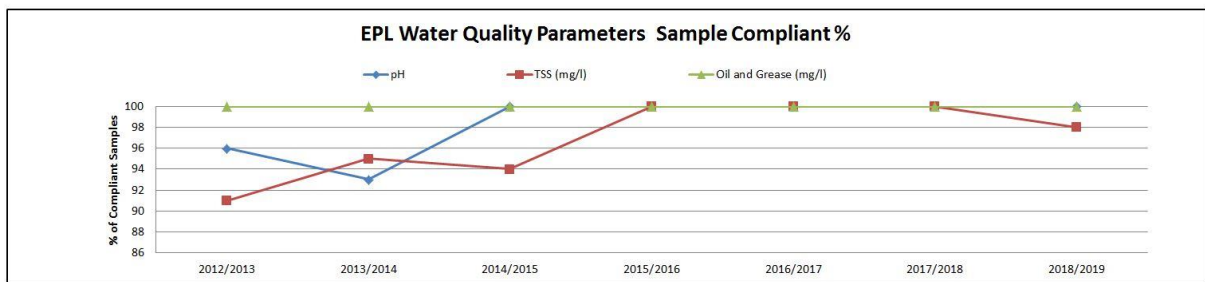
Over the past few reporting periods, PKCT has worked on a number of projects to improve the quality of water at LDP16 including completion of a dredging program in the Settlement Lagoon, upgrading of the Central Pond, installation of transfer pipeline systems enabling water transfer between ponds if required and development of a coagulant dosing system to assist with water clarification. A combination of all these works has enabled PKCT to maintain a relatively high level of compliance of discharge water through LDP16 during the 2018/2019 reporting period.



**5.5.3 Trends in Surface Water Monitoring**

Figure 29 below highlights the trends in compliance measured at LDP16 for EPL 1625 water quality parameters of pH, TSS and Oil and Grease. As is shown in Figure 29, compliance has remained relatively stable at 100% for Oil and Grease and 98% for TSS during this reporting period. pH is now monitoring and reporting only.

Monitoring Parameter	2012/2013		2013/2014		2014/2015		2015/2016		2016/2017		2017/2018		2018/2019	
	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %
pH		96		93		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only
TSS (mg/l)	68	91	91	95	143	94	72	100	54	100	17	100	86	98
Oil and Grease (mg/l)		100		100		100		100		100		100		100



**Figure 29 : Trends in water EPL water quality data at LDP16**

Total water (recycled + potable) used this reporting period remained at historically low levels, falling further from last year’s levels of 291 ML to 262.5 ML in 2018/2019, see **Error! eference source not found.** below. Potable water used at PKCT in the 2018/2019 continued to fall to only 26.6 ML.

There have been a number of activities across the 2018/2019 reporting period that have contributed to the reduced water usage observed over the past three reporting periods. These activities include, significantly lower throughput meaning less “coal on the ground” to manage, and the continued isolation of the southern portion of the site for Restoration and Compliance works which has effectively sterilised the area for coal or bulk product storage.

Recycled water as a percentage of the total water used has increased to 88.7% in this reporting period.

Overall, the use of recycled water is considered a benefit to the environment in its provision of significant potable water savings. PKCT continues to look for water savings across its operations.

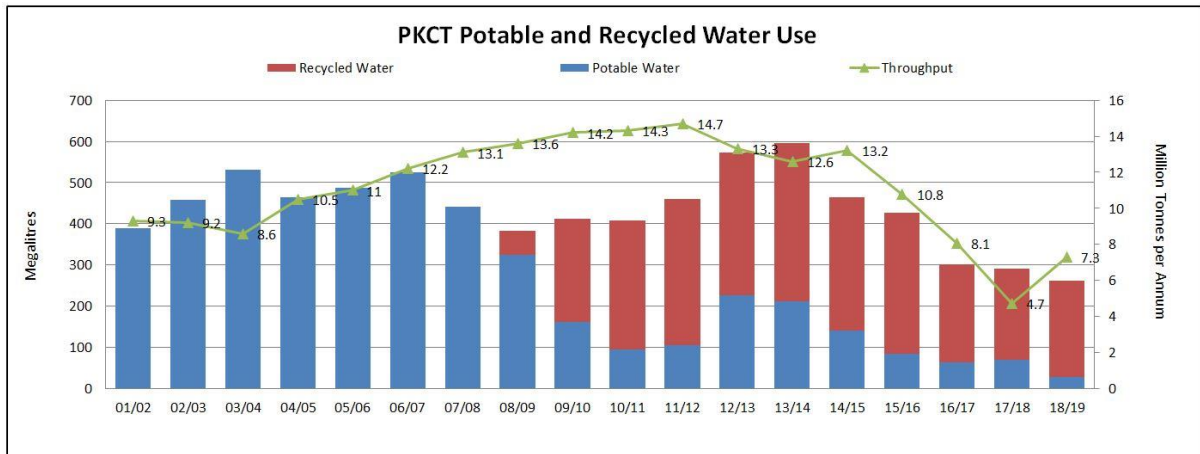


Figure 30 : Trends in Potable and Recycled water use at PKCT

5.5.4 Surface Water –Activities Undertaken During 2018/2019Reporting Period

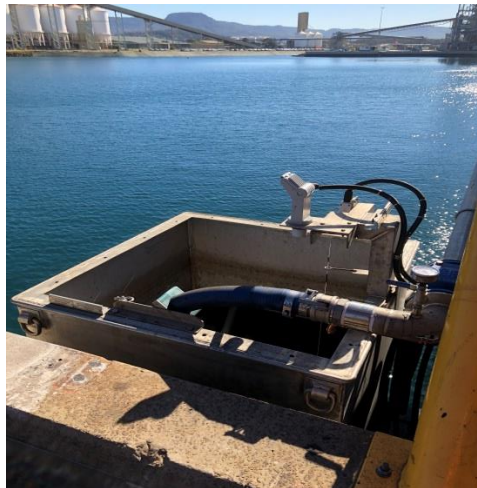
A summary of the actions undertaken for the 2018/2019 reporting period related to surface water is presented below.

- Continued sediment surveys and sediment removal as needed from the Central Pond and others on an increased frequency has helped to minimise the volume of sediment being transferred across to the Settlement Lagoon which in turn has helped to manage the quality of discharged water through LDP16.
- PKCT engaged a survey team to survey the basal profiles of all sediment storage ponds on site. Data from the survey was used to install markers to assist the daywork team with visually managing the sediment levels within the ponds. Refer Figure 31 below.



Figure 31 : Sediment Markers used to manage sediment levels within the ponds.

- Completed the berth drainage project that totally sealed the northern and southern sections of the 102 Coal Berth and provided drainage and pumping systems back to site. This project has not only reduced the likelihood of water leaving the berth during rainfall events, but has also reduced the likelihood of spillage to harbour during washing of ship-loading equipment on the Berth. See Figure 32 below.



**Figure 32 : Berth 102 drainage sump.**

#### **5.5.5 Surface Water - Activities Planned for 2019/2020 Reporting Period**

PKCT will continue to utilise the existing tools and measures to ensure non-compliances are avoided. The following activities are planned to improve surface water management in the next reporting period:

- PKCT has engaged a consultant to undertake a full review of the Contaminated Water System. The review includes a detailed assessment of the site pipe and pump infrastructure, pond capacities and equipment suitability. The review is underway and is expected to be completed by the end of the calendar year. It is likely that recommendations from the review will be actioned during the next reporting period.
- PKCT has funded a project to fully automate an existing manual coagulant dosing station at the Central Pond and install a fully automated coagulant dosing system at the Northern Pond. These systems will assist PKCT in managing waters with clay particles if they are experienced on site. Installation is expected to occur during August and September 2019.
- PKCT has purchased a suite of sediment control devices to assist with limiting sediment reaching the site drainage network. PKCT has engaged a consultant to install the equipment during late July 2019.

- Continue to identify and implement opportunities for improvement related to surface water at PKCT as they arise.

## 5.6 Biodiversity

### 5.6.1 Biodiversity Standards and Performance Measures

#### Green and Golden Bell Frog Management Plan

14. The Proponent shall prepare and implement a Green and Golden Bell Frog Management Plan for the project to the satisfaction of the Director-General. This program must:
- (a) be developed in consultation with DECC; and
  - (b) be submitted to the Director-General for approval within 12 months from the date of this approval, or as otherwise agreed by the Director-General.

### 5.6.2 Biodiversity Monitoring

#### 5.6.2.1 Biodiversity Monitoring, Results and Compliance

A Green and Golden Bell Frog Management Plan MP.HS.109 (GGBFMP) is implemented, in operation and DP&E approved. The GGBFMP has been developed in consultation with the EPA and PKCT is continuing to work closely with the authority as matters arise. Actions include:-

- Maintenance and monitoring by Wollongong City Council of its Greenhouse Park frog ponds.
- Periodic surveys involving an expert consultant. Surveys to include PKCT premises and Wollongong City Council's greenhouse Park frog ponds.
- Monitoring and reporting by site personnel as part of site operations.
- Ongoing awareness for site personnel through inductions and site communications.

#### 5.6.3 Trends in Biodiversity

PKCT undertakes GGBF surveys and records all sightings in a register. PKCT personnel have not identified any GGBF during normal operations or as a result of focused surveys since 2011. Figure 33 below shows the trend in GGBF sightings at PKCT back to the 2007/2008 financial year.



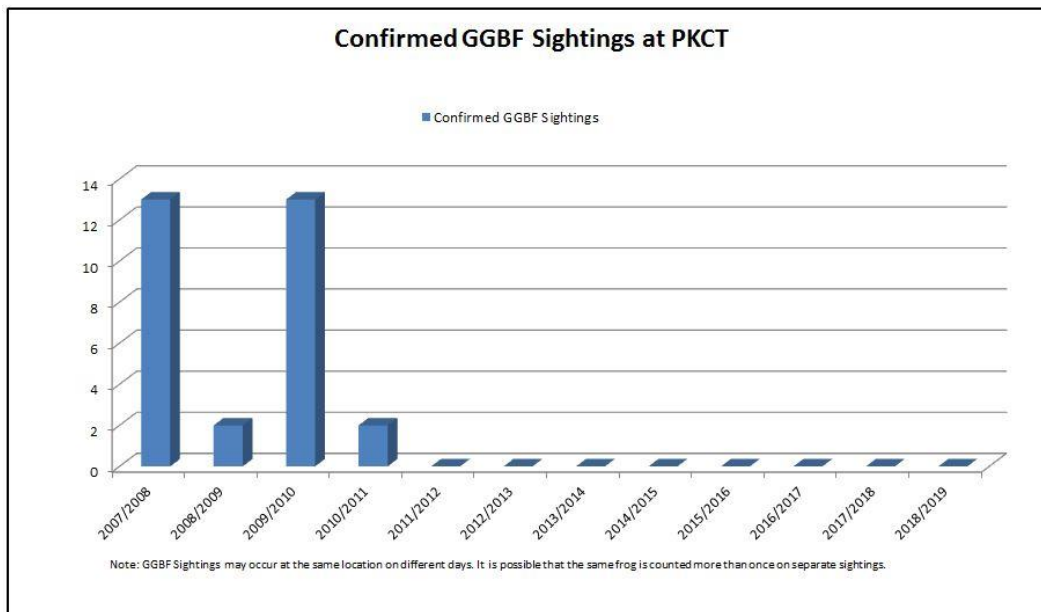


Figure 33 : GGBF sightings at PKCT

**5.6.4 Biodiversity –Activities Undertaken During 2018/2019 Reporting Period**

A summary of the actions undertaken for the 2018/2019 reporting period related to biodiversity is presented below.

- PKCT undertook a GGBF survey on the 7<sup>th</sup> February 2019. The survey was supervised by an expert consultant, with assistance provided by the PKCT Environmental Specialist. The survey confirmed that GGBFs are not currently present on site. The Peron’s Tree Frog, the Striped Marsh Frog and the Bleating Tree Frog were the only species of frog found on site during the survey. As in previous years, juvenile Peron’s Tree Frogs were present to the north of the site, indicating successful reproduction. The presence of the Striped Marsh Frog and the Whistling Tree Frog were also recorded at Greenhouse Park.
- Workers at PKCT are instructed to report and record any GGBF (or other frog) sightings throughout the year. Any frog sightings are recorded in a site database. No GGBFs were identified by the PKCT site personnel in the 2018/2019 reporting period.
- In April and May 2019, a series of Toolbox Talks were undertaken with the Daywork and Shift Teams which were focused on Green and Golden Bell Frogs. The work groups were presented with a handout highlighting how to identify the GGBF and what to do if they are found on site. This discussion is periodically rolled out across the site to re-familiarise the workforce of PKCT’s obligations.
- During the reporting period PKCT replaced a section of fencing along the rail corridor designed to provide a barrier to GGBF entering the rail corridor. The fencing consists of a one metre high shade cloth barrier extending for a distance of approximately 500m along the rail corridor. See Figure 34 below:



**Figure 34 : Shade-cloth GGBF exclusion barrier along rail corridor**

**5.6.5 Biodiversity - Activities Planned for 2019/2020 Reporting Period**

PKCT will continue to ensure that the biodiversity standards and performance measures are considered during any planning for future restoration and improvement works. A summary of the planned actions for the 2019/2020 reporting period related to biodiversity is presented below.

- Continued monitoring for GGBF populations at PKCT during site operations and Project Works.
- Undertake further surveys when deemed necessary.

**5.7 Visual Amenity**

**5.7.1 Visual Amenity Standards and Performance Measures**

**Lighting Emissions**

15. The Proponent shall:
- (a) ensure no external lights shine above the horizontal;
  - (b) ensure that all external lighting associated with the project complies with *Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting*, or its latest version, and
  - (c) take all reasonable and feasible measures to mitigate off-site lighting impacts from the project to the satisfaction of the Director-General.

**Landscape Management Plan**

16. The Proponent shall prepare and implement a Landscape Management Plan to the satisfaction of the Director-General. This Plan must:
- (a) be submitted to the Director-General for approval within 12 months of this approval, or as otherwise agreed by the Director-General; and
  - (b) include;



- details of screening trees to be planted on the road receiveal earth bund and along the northern site boundary; and
- an implementation program.

## 5.7.2 Visual Amenity Monitoring

### 5.7.2.1 Visual Amenity Monitoring, Results and Compliance.

Lighting - A consultant, undertook a review of site lighting and assessment against the standard in 2011. A report of 4<sup>th</sup> October 2011 concluded that PKCT was compliant with AS 4282 and no evidence of any detrimental impact was found on residential areas.

Obligations associated with lighting emissions have been communicated to personnel involved in plant modifications and upgrades and the requirements are taken into account in project development.

PKCT has completed a major restoration and compliance project on site. As part of the project, all new lighting complies with AS4282. Additionally, the project has generally used LED lighting and ensured light emission is either local to access and stairway areas or, elevated and directed towards the ground or stockpiles in other areas. The lights have been designed so that they are easily accessible allowing for quick adjustment if required.

Landscaping - PKCT's Landscape Management Plan MP.HS.470 (LMP) is in operation and DP&E approved. This document includes details of proposed tree planting. Implementation is staged and processed through PKCT's project approval process.

PKCT utilises a landscaping contractor to maintain lawns and gardens and control weeds on site. Landscape contractor staff are trained in chemical application and use non-residual herbicides. All weed spraying undertaken considers prevailing weather conditions and locations, and PKCT is provided with a Weed Spraying Notification Form (WSNF) each time an herbicide is used on site. See 11.5 Appendix E: Weed Spraying Notification Form for an example of a WSNF.

### 5.7.3 Trends in Visual Amenity

PKCT's lighting survey in 2011 did not identify any offsite lighting impacts associated with the PKCT operation. There have been no recorded community complaints relating to lighting since PKCT commenced operations in 1990.

### 5.7.4 Visual Amenity –Activities Undertaken During 2018/2019 Reporting Period

A summary of the actions undertaken for the 2018/2019 reporting period related to visual amenity is presented below.

- PKCT's Road Receiveal Landscaping Project was undertaken during January and February this year. This major landscaping project aimed at developing a visual screen for residents to the west of the terminal, shielding truck tipping activities through the planting of 600 trees and approximately 200 sedges on the adjacent berm. The trees planted were a mix of native trees, shrubs and sedges and will take around 3-5 years to

become established, see Figure 35 and Figure 36 below. In addition to the screening, as they grow, the trees will assist with dust reduction in the area.



**Figure 35 : Tree Planting - Northern Road Receival Berm (1)**



**Figure 36 : Tree Plantings – Northern Road Receival Berm (2)**

- PKCT’s Administration Building Upgrade Project. In addition to a major refurbishment of the internals of the Main Administration Building, the overall amenity of the building was significantly improved by the inclusion of a new landscaped garden. This amenity improvement project was completed in June 2019 - refer Figure 37 below.



**Figure 37 : Main Administration Building landscaped gardens**

- Ongoing maintenance of the landscaped area near the northern transfer station. The garden is now well established in this area, see Figure 38 below.



**Figure 38 : Landscaped area near Northern Transfer Station, June 2019**

- All new lighting complies to AS4282 and maintained to ensure minimise off-site impacts. There were no community complaints relating to lighting across the 2018/2019 reporting period.



### 5.7.5 Visual Amenity - Activities Planned for 2019/2020 Reporting Period

PKCT will continue to ensure that visual amenity and landscape management is maintained and included for consideration during any planning for future restoration and improvement works.

## 5.8 Greenhouse and Energy Efficiency

### 5.8.1 Greenhouse and Energy Efficiency Standards and Performance Measures

#### Operating Conditions

17. The Proponent shall implement all reasonable and feasible measures to minimise:
- (a) energy use onsite; and
  - (b) greenhouse gas emissions from the project to the satisfaction of the Director-General.

#### Greenhouse and Energy Efficiency Plan

18. Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:
- (a) be prepared generally in accordance with the *Guidelines for Energy Savings Action Plans* (DEUS 2005, or its latest version);
  - (b) be submitted to the Director-General for approval;
  - (c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;
  - (d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;
  - (e) describe how the performance of these measures would be monitored over time; and
  - (f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.

### 5.8.2 Greenhouse and Energy Efficiency Monitoring

#### 5.8.2.1 Greenhouse and Energy Efficiency Monitoring Methodology

In accordance with Condition 18, a Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461 (GGEEMP) was included in the 0910 AEMR submission to DP&E. It outlines the monitoring and management processes in place, including PKCT's Energy Savings Action Plan (Established under the Energy Administration (Water and Energy Savings) Act 2005), and regulated by EPA).

The GGEEMP remains in operation and is DP&E approved.

In accordance with legal advice, PKCT, having operational control, is deemed to be the reporting entity under the referenced legislation. Accordingly, PKCT is currently under the reporting threshold.

A consultant was engaged to advise on applicable site activities and energy aspects and to develop a monitoring format. The format developed has been implemented. Though not reporting at this stage, PKCT is recording data and monitoring energy use and greenhouse



gas generation. Figure 39 below outlines the volumes of reportable emissions from PKCT operations across the reporting period.

2018/2019 FY (July-June)	A		B		C	D	E
	Reporting unit	Amount consumed (reporting unit)	Energy content (GJ per reporting unit)	Emissions factor (kg CO2-e per GJ)	Reportable energy (GJ)	Reportable emissions (tonnes CO2-e)	
<b>Scope 1 – direct emissions</b>							
Diesel oil(transport)	kL	0	38.60	69.90	0	0	
Diesel oil (stationary energy)	kL	0	38.60	69.50	0	0	
Biodiesel B20 (Transport)	kL	23	30.88	69.51	723	50	
Petrol (transport)	kL	9	34.20	69.60	315	22	
Petroleum based oils	kL	3.04	38.80	27.90	118	3	
Petroleum based greases	kL	3.20	38.80	27.90	124	3	
Acetylene	m3 *	0	0.0393	51.33	0	0	
<b>Scope 2 – indirect emissions</b>							
Electricity	kWh	12,968,135	0.0036	0.83	46685	10764	
<b>Total</b>					<b>47965</b>	<b>10842</b>	
<b>Threshold (as per 2018/2019)</b>					<b>100,000</b>	<b>25,000</b>	

<http://www.cleanenergyregulator.gov.au/NGER/Reporting-cycle/Assess-your-obligations/Reporting-thresholds>

**Figure 39 : Greenhouse gas report 2018/2019**

**5.8.2.1 Greenhouse and Energy Efficiency Monitoring, Results and Compliance.**

Energy use is measured at PKCT on a monthly basis. Energy use generally follows the same trend as throughput at the site, i.e. when there is an increase in throughput, energy use also increases. F below provides monthly energy consumption and tonnes (throughput) for the 2018/2019 reporting period, with month to month variation largely continuing to follow this expected correlation.



Figure 40 : PKCT tonnes v kWh

5.8.3 Trends in Energy Efficiency

PKCT measures energy efficiency against its baseline energy efficiency target of 1.655 kWh/tonne. This figure is calculated by dividing the energy used at the premises (kWh) by throughput (tonnes). The 2018/2019 reporting period saw nine months where monthly kWh/tonne exceeded the baseline energy efficiency target, see Figure 41 below. These records correspond with historically low throughput across the reporting period. Overall, the site operated at an energy efficiency level of 1.88 kWh/tonnes for the 2018/2019 reporting period which, while above the baseline energy efficiency target of 1.655kWh/tonne, shows a significant improvement over recent results. Again this result is directly related to the annual throughput at the Terminal.

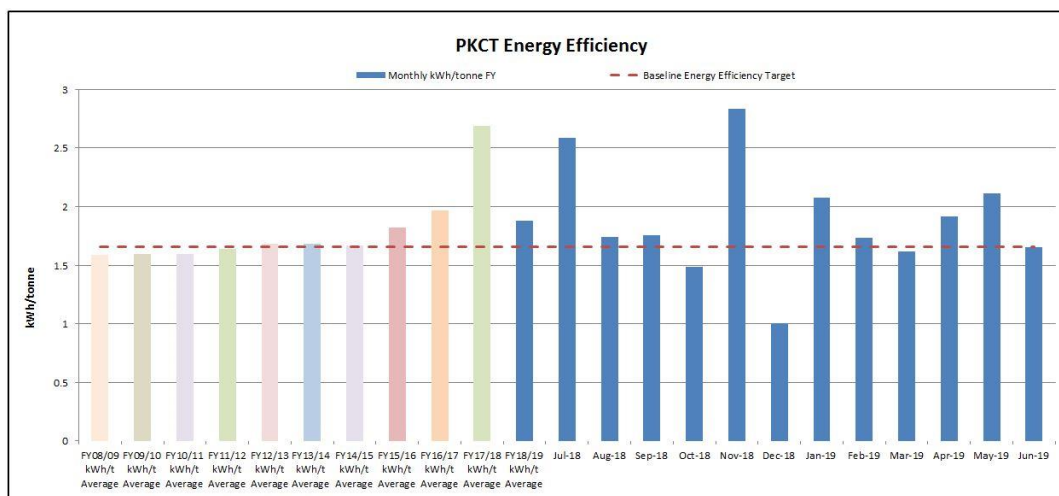


Figure 41 : PKCT energy efficiency trends



PKCT monitors greenhouse gas generated by the site annually. At this stage, greenhouse gas emissions and reportable energy are below the legislated reporting thresholds, see Figure 39 above.

Reportable energy consumption and greenhouse emissions remain relatively low and well below reporting thresholds for this reporting period. The small increases observed in 2018/2019 reflecting the corresponding small increase in throughput for the period. Figure 42 below shows these trends.

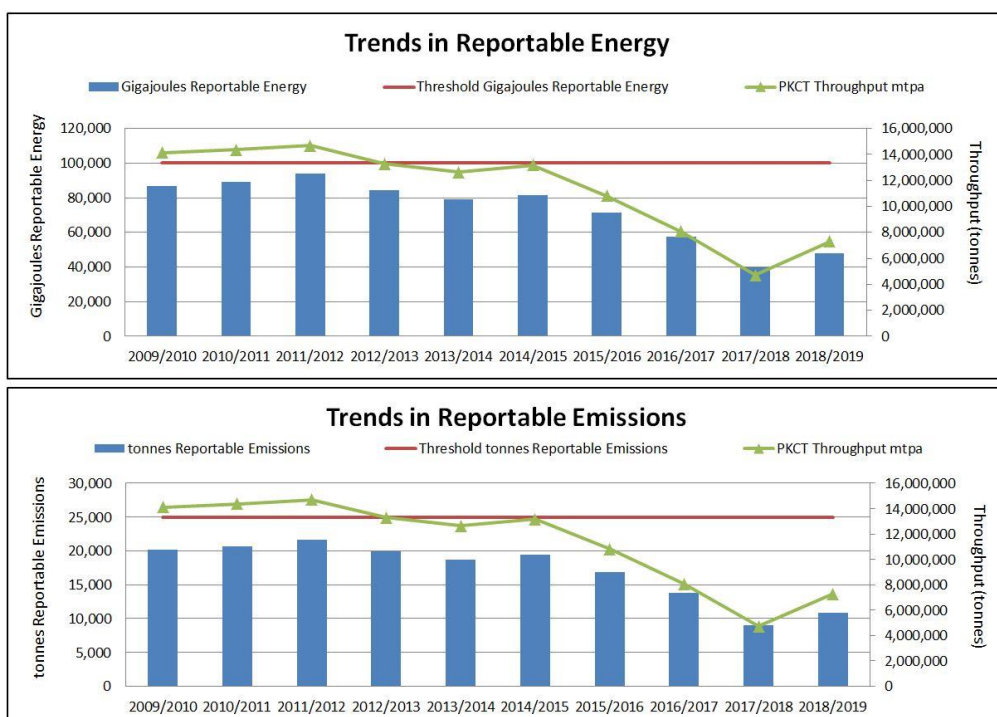


Figure 42: Trends in reportable energy and greenhouse gas emissions

**5.8.4 Energy Efficiency –Activities Undertaken During 2018/2019 Reporting Period**

A summary of the actions undertaken for the 2018/2019 reporting period related to Energy Efficiency is presented below.

- PKCT continues to look for energy savings wherever possible. PKCT has completed a major restoration and compliance program which includes replacing the yard machines with LED lighting to focus light only where needed and reduce energy use, Variable Speed Drives and power factor correction to reduce energy losses in the distribution system.
- As per the recommendations made in the 2017 AECOM Independent External Audit, PKCT updated its GGEEMP to reflect that the Energy Savings Action Plan Program has ended and identified a new framework for identifying and implementing measures to reduce greenhouse gas emissions. Additionally, the Plan was updated to include the current NGER reporting thresholds and triggers.



### 5.8.5 Energy Efficiency - Activities Planned for 2019/2020 Reporting Period

A summary of these actions planned for the 2019/2020 reporting period is presented below.

- PKCT will continue to ensure that energy efficiency is considered during any planning for future restoration works.

## 5.9 Waste

### 5.9.1 Waste Standards and Performance Measures

#### Operating Conditions

19. The Proponent shall:
- (a) monitor the amount of waste generated by the project;
  - (b) investigate ways to minimise waste generated by the project;
  - (c) implement reasonable and feasible measures to minimise waste generated by the project; and
  - (d) report on waste management and minimisation in the AEMR to the satisfaction of the Director-General.

### 5.9.2 Waste Monitoring

#### 5.9.2.1 Waste Monitoring Methodology

PKCT's Waste Management Plan MP.HS.460 (WSMP) was submitted to DP&E with the 0910 AEMR. The plan is in operation. The WSMP contains waste monitoring, assessment, reporting, and mitigation and management provisions to ensure necessary actions are undertaken and that waste from PKCT premises comply with the criteria in the condition above.

The objectives of the WSMP are to;

- Identify waste streams from PKCT normal operations.
- Review waste streams to identify opportunities to reduce waste generation.
- Categorise identified waste streams into reuse, recycle, recovery or disposal.
- Provide a framework for managing waste and educating staff to reduce disposal.
- Provide methodology for waste handling to ensure implementation of framework.
- Ensure availability of waste related data for the PKCT AEMR.
- Monitor the success of the WSMP and continually improve it based on results

- Ensure suitable PKCT Managerial review of the waste management process leading to consideration and/or implementation of suitable improvement opportunities.

**5.9.2.2 Waste Monitoring Results and Compliance 2018/2019**

PKCT records and tracks waste as it is generated across the site. Waste streams at PKCT are tracked via normal operations and through project specific operations. In the 2018/2019 reporting period significant project works continued and included the demolition of several large yard machines including Stackers #1 and #2, and Reclaimer #1. All project waste is collected and where appropriate recycled. A summary of the waste generated through various projects at PKCT is presented below in Figure 43.

Waste Volumes by Project - July 2018 to June 2019			
Project	Type	Quantity (tonnes)	Disposal method
ST1, ST2, RC1 Demolition	General Solid Waste	79.56	Landfill
	Aluminium	9.36	Recycled
	HM Steel	1888.88	Recycled
	Copper Cables and Pipes	28.52	Recycled
	Hydrocarbons	4.3 kilolitres	Recycled
	Pig Iron	272.33	Recycled
	Stainless	23.79	Recycled
	Asbestos	0.036	Landfill
	Conveyor Belt	27.5	Recycled
	Concrete	270.16	Recycled

**Figure 43 : Project Generated Waste 2018/2019**

General site waste is managed by a waste contractor on behalf of PKCT. An annual summary of the waste generated at PKCT across the reporting period is presented below in Figure 44.

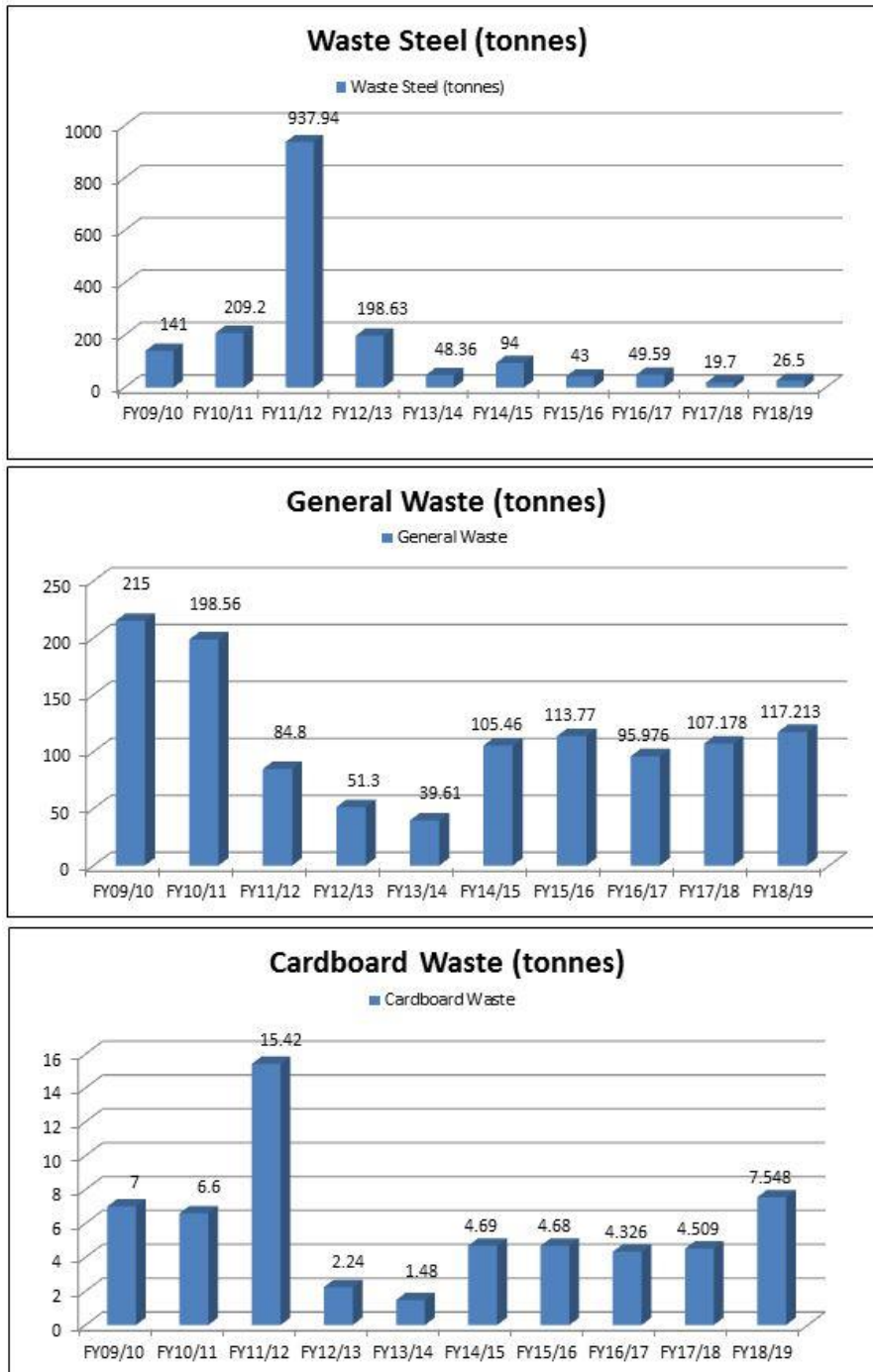
Annual Waste Volumes	July 2018 to June 2019		
General Waste	117,213	kg	Landfill
Cardboard Recycling	7,548	kg	Recycled
Waste Rags	100	L	Recycled
Waste Grease Cartridges	100	L	Recycled
Waste Oil Filters	0	L	Recycled
Waste Pressure Packs	390	L	Recycled
N100 -Containers and drums containing controlled waste residues	660	kg	Off Site Treatment
Black Iron	26.5	tonne	Recycled
Copper	1.8	tonne	Recycled

**Figure 44 : Waste Summary 2018/2019**



**5.9.3 Trends in Waste**

Figure 45 below shows trends in three different waste streams generated at PKCT; steel, general waste and cardboard. The 2018/2019 reporting period saw waste streams remaining relatively stable, with the exception of the volume of cardboard waste which nearly doubled over recent levels largely as a result of the Administration Building refurbishment.



**Figure 45 : Waste Trends at PKCT**

#### 5.9.4 Waste –Activities Undertaken During 2018/2019 Reporting Period

A summary of the actions undertaken for the 2018/2019 reporting period related to waste is presented below.

- 14,797 tonnes of spillage coal were returned to customers as part of spillage screening and recycling activities during the reporting period.
- Associated with waste, and as outlined under Section 5.3.4 Air Quality –Activities Undertaken During 2018/2019 Reporting Period, PKCT completed a project of consolidating and surface profiling the eastern side of the Bulk Products storage area. Improvements to the area included drainage upgrades, erosion control features and a two-coat sealing process designed to reduce dust generation. Additionally, the fill was utilised on site and redirected from being taken to landfill as a waste product.

#### 5.9.5 Waste - Activities Planned for 2019/2020 Reporting Period

The waste related activities which are planned for the coming reporting period are outlined below.

- PKCT will undertake an annual review of the Waste Management Plan.
- PKCT will continue to identify areas of waste reduction across its operations.

### 5.10 Hazards

#### 5.10.1 Hazards Standards and Performance Measures

##### Dangerous Goods

20. The Proponent shall ensure that storage, handling and transport of dangerous goods are done in accordance with the relevant *Australian Standards*, particularly AS1940 and AS1596, and the *Dangerous Goods Code*.

#### 5.10.2 Hazards Monitoring

##### 5.10.2.1 Hazards Monitoring, Results and Compliance.

PKCT is aware of all dangerous goods onsite and ensures personnel are suitably trained to handle these. Any substances onsite are stored in accordance with AS1940 & AS1596.

PKCT utilises a proprietary chemical database system called ChemAlert to record information on chemicals at the site. Safety Data Sheets (SDS) and substance evaluation forms are available electronically from ChemAlert and PKCT's intranet systems.

Regular environmental auditing is undertaken at PKCT to ensure compliance with relevant standards.

PKCT continues to utilise a mobile refuelling system for its plant machinery and does not store any fuel on site. In February 2014, PKCT decommissioned the underground fuel storage tanks and completed remediation of the site.

## 5.11 Fire Control

### 5.11.1 Fire Control Standards and Performance Measures

#### Fire Control

21. During the project, the Proponent shall:

- (a) ensure that it maintains suitable equipment to respond to any fires onsite; and
- (b) assist the fire and emergency services as much as possible if there is a fire onsite.

22. The Proponent shall ensure that it maintains a Fire Management Plan for the site.

### 5.11.2 Hazards Monitoring

#### 5.11.2.1 Fire Control Monitoring, Results and Compliance.

PKCT has a Fire Management Plan MP.HS.459 (FMP) in place which outlines the processes in place pertaining to fire management associated with the PKCT operations.

### 5.11.3 Fire Control – Activities Undertaken During 2018/2019 Reporting Period

There were no reportable fires associated with the PKCT operation across the reporting period.

A summary of further activities undertaken associated with fire control across the reporting period is presented below:-

- Ongoing servicing and compliance checks of fire-fighting systems in line with relevant standards, is undertaken by certified external service providers.
- On 17th July 2018, PKCT facilitated a visit to site with the NSW Fire and Rescue Service and undertook a walk around/discussion with the group on PKCT fire risk and access requirements. The visit was a way of familiarising the local service with the PKCT operation and available fire-fighting facilities.

### 5.11.4 Fire Control - Activities Planned for 2019/2020 Reporting Period

PKCT will continue to utilise its FMP and ensure it complies with the stipulated fire control standards and performance measures.

- PKCT will continue to take opportunities to work with the NSW Fire and Rescue Service through ongoing site familiarisation visits. These will be rolled out across the coming reporting period.
- PKCT will continue to ensure ongoing servicing and compliance checks of fire-fighting systems remain in line with relevant standards and checks are undertaken by certified external service providers.



## 5.12 Community

### 5.12.1 Community Engagement Activities

PKCT continues to utilise its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. A summary of the information presented to the PKCT CCC during the reporting period is presented below in .

PKCT CCC meeting presentations can be found on the PKCT website, [www.pkct.com.au](http://www.pkct.com.au)

Meeting Date	Presented Information
19 <sup>th</sup> September 2018	PKCT Operational update, environmental compliance for air and water quality, CSIRO dust analysis, recent environmental improvements, general business.
22 <sup>nd</sup> May 2019	Environmental compliance for air and water quality, non-conformance information, recent environmental improvements, general business and information on proposed gas plant.

**Figure 46: PKCT CCC Meetings**

### 5.12.2 Community Contributions

PKCT continues to support the Port Kembla Branch of the Mission to Seafarers. In 2019 PKCT donated \$5000 to this community fund.

PKCT also operates a “Win of the Month” program whereby members of the workforce who excel at work during the month are recognised and given the opportunity nominate their preferred charity to which the company then provides a donation. This program contributed a further \$1387 to numerous charities including Beyond Blue, Rural Aid, Every Day Hero’s and Wollongong Children’s Hospital.

### 5.12.3 Community Complaints

PKCT received two community complaints during the reporting period, a number similar to recent reporting years.

The first complaint received on 23<sup>rd</sup> January 2019 related to a report of dust on a local resident’s furniture following a strong southerly wind change. PKCT investigated the event and noted that all of the available dust suppression equipment on site was operational during the southerly change. PKCT had a sample of the dust analysed and shared the data with the resident.

The second complaint on 7<sup>th</sup> May related to an observation of littering in a public car park along the Seawall Road adjacent to PKCT. PKCT contacted the resident and discussed the observation and re-communicated the expectations of the company throughout the workforce. A bin has since been installed in this area.





Both complaints were captured within PKCT’s Event Management System

A summary of community complaints by type as received over the past 9 years is presented below in Figure 47.

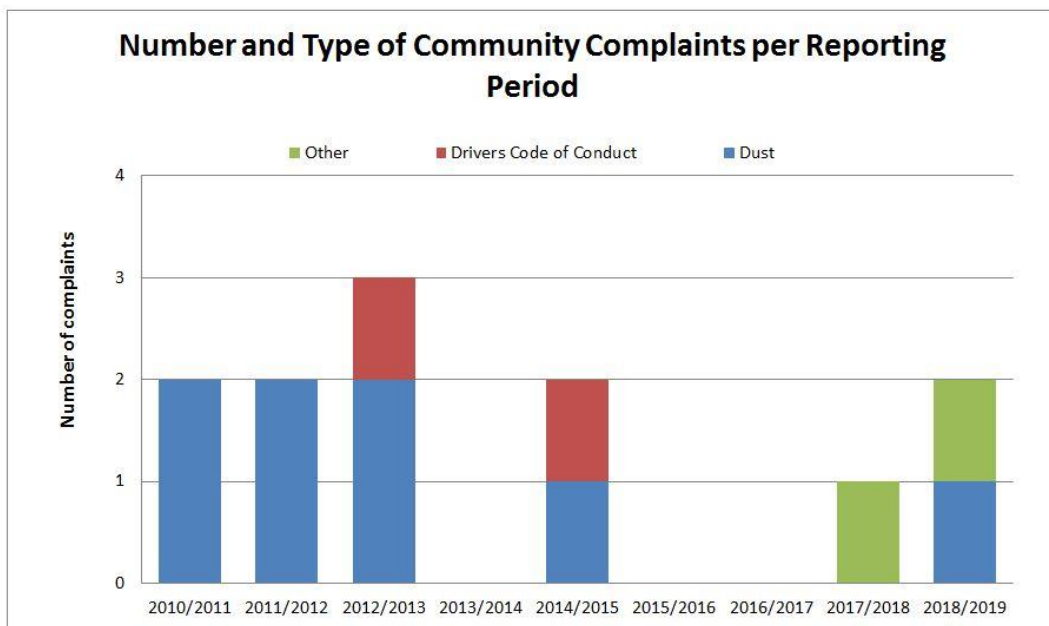


Figure 47 : Community Complaints Summary

## 6.0 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

### 6.1 Environmental Management Performance Measures and Compliance

Environmental Management (Schedule 4, Condition 1)	Relevant section of PKCT EMS
The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:	Refer to the PKCT EMS
a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General	EMS was submitted to the DP&E with eth 2009/2010 AEMR by the due date of 31 <sup>st</sup> July 2010
b) provide for the strategic context for the environmental management of the project;	Refer to Section 5
c) identify the statutory requirements that apply to the project;	Refer to Section 6
d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the project</li> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise during the course of the project;</li> <li>respond to any non-compliance;</li> <li>manage cumulative impacts; and</li> <li>respond to emergencies;</li> </ul>	Refer to Section 11  Refer to Section 11 Refer to Section 11.3  Refer to Section 7.6 Refer to Section 7.3 Refer to Section 8.1
e) include an environmental monitoring program for the project that includes all the monitoring requirements of the approval;	Refer to Section 9



f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and	Refer to Section 9
a) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.	Refer to Section 4

**Figure 48 : EMS compliance in the AEMR**

PKCT has in place an approved Environmental Management Strategy (EMS). The EMS was submitted with the 2009/2010 AEMR to the DP&E. The EMS details how PKCT complies with each line item of Schedule 4, Condition 1, Environmental Management of Project Approval 08\_0009. Figure 48 above references the specific EMS Sections that PKCT utilises for compliance with Schedule 4, Condition 1.

**6.2 Reporting - Incident Reporting**

<p><b>Incident Reporting</b></p> <p>2. Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.</p> <p>3. Within 21 days of notifying the Department and other relevant agencies of such an incident, the Proponent shall provide the Department and these agencies with a written report that:</p> <ul style="list-style-type: none"> <li>a) Describes the date, time, and nature of the incident;</li> <li>b) Identifies the cause (or likely cause) of the incident</li> <li>c) Describes what action has been taken to date: and</li> <li>d) Describes the proposed measures to address the incident.</li> </ul>
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Requirements associated with Schedule 4, Conditions 2 and 3 are referenced in PKCT’s EMS and Event Management Procedure. There were no reportable incidents of “material harm” across the 2018/2019 reporting period.

**6.3 Reporting - Annual Reporting**

<p><b>Annual Reporting</b></p> <p>4. Within 12 months of this approval, and annually thereafter, the Proponent shall submit and AEMR to the Director-General and all relevant agencies. This report must:</p> <ul style="list-style-type: none"> <li>a) Identify the standards and performance measures that apply to the project</li> <li>b) Describe the works carried out in the last 12 months;</li> <li>c) Describe the works planned to be carried out in the next 12 months;</li> <li>d) Include a summary of the complaints received during the past year; and compare this to complaints received in the previous years;</li> </ul>
--

- e) Include a summary of the monitoring results for the project during the past year;
- f) Include an analysis of these monitoring results against the relevant:
  - Impact assessment criteria/limits;
  - Monitoring results from previous years; and
  - Predictions in the EA or other documents listed in condition 2 of schedule 2;
- g) Identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures;
- h) Identify any trends in the monitoring results over the life of the project;
- i) Identify any non-compliance during the previous year; and
- j) Describe what actions were, or are being, taken to ensure compliance.

Following feedback from the DP&E on the format of the 2012/2013 AEMR, PKCT revised the structure of the 2013/2014 AEMR to better align with the requirements of Schedule 4, Condition 4. Feedback following submission of the 2015/2016 AEMR requested additional inclusions to be added to the 2016/2017 AEMR. These additional inclusions were to;

- Add a map showing the regional context
- Include a summary of any community engagement activities and contributions and
- Detail (i.e. subject, timing or location) of any complaints over the previous reporting periods for the purpose of trend analysis.

Each of these additional components is included in this AEMR.

There were no further requests from the DP&E to change the formatting of the 2016/2017 report and this currently remains the standard for subsequent reports.

#### 6.4 Independent Environmental Audit

##### Independent Environmental Audit

5. By 31 March 2011 and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an independent Environmental Audit of the Project. This audit must:
  - a) Be conducted by a suitable qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;
  - b) Include consultation with the relevant agencies;
  - c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL (Including any strategy, plan or program required under these approvals); and
  - d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate
  - e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.

*Note: This audit team should be led by a suitably qualified auditor, and include experts in the field of noise, air quality, and traffic management.*

6. Within 6 weeks of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit

report.

7. Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director-General.

As required under Schedule 4, Condition 5 of Project Approval 08\_0009, PKCT undertook its Triennial Independent External Audit on 7<sup>th</sup> and 10<sup>th</sup> April 2017. The auditor, AECOM, was approved by the Director-General by letter dated 2<sup>nd</sup> March 2017.

PKCT completed the audit and submitted an Audit Report and associated Action Plan to the DP&E on 14<sup>th</sup> June 2017. By letter dated 26<sup>th</sup> July 2017, PKCT received formal feedback from the DP&E indicating the submitted Audit Report and Action Plan generally satisfied the requirements of condition 5 of PKCT Approval.

Of the conditions audited from the MCoA (including Statement of Commitments and Drivers Code of Conduct), 74 conditions were found compliant. There were 5 conditions found to be non-compliant and 2 conditions not verified.

Of the conditions audited from the EPL, 36 conditions were found compliant. There were 7 conditions found to be non-compliant and 2 conditions not verified.

It is noted that of the 12 conditions found to be non-compliant, 8 of these are associated with events that occurred early in the 3 year audit period. Remedial actions associated with these events were developed and completed around the time of the event.

The submitted Action Plan with further details on the non-compliances is presented in Appendix F: Triennial Independent Audit Findings and Action Plan.

## 6.5 Access to Information

### Access to Information

8. Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:
  - a) provide a copy of the relevant document/s to the relevant agencies
  - b) place a copy of the document/s on its website; and
  - c) remove superseded copies of strategies/plans/programs from its website.
9. During the project, the Proponent shall:
  - a) make a summary of monitoring results required under this approval publically available on its website; and
  - b) Update these results on a regular basis (at least every 6 months).

Actions arising from the 2017 Triennial Independent Audit included updating of a number of PKCT Management Plans, refer to Appendix F: Triennial Independent Audit Findings and Action Plan.



As required under Condition 9, PKCT makes a summary of its monitoring results publicly available on its website. The PKCT 2017/2018 AEMR can be found on [www.pkct.com.au](http://www.pkct.com.au).

Via letter dated 16<sup>th</sup> March 2017, the Department granted PKCT permission to cease continuation of the Interim EMR as it was deemed that that adequate environmental monitoring data was being made available via other reporting mechanisms (i.e. Annual Return and AEMR).

**7.0 STATEMENT OF COMMITMENTS**

PKCT prepared and submitted a Statement of Commitments as part of the Environmental Assessment submitted to the DP&E for the 08\_0009 Major Project Application. The DP&E accepted these commitments and they now form “Appendix 2” of the Approval.

PKCT’s compliance with these commitments across the 2018/2019 reporting period is outlined in the following sections.

**7.1 Statement of Commitments -Traffic and Transportation**

Objective	Commitment
<ul style="list-style-type: none"> <li>Transport of coal and bulk products to PKCT to be conducted in a manner which does not adversely impact on public safety or amenity of road users.</li> <li>Safety standards to be maintained by trucks following designated routes procedures</li> <li>Internal PKCT roadways to be maintained to minimize coal and bulk products spillage and carry over onto public roadways.</li> </ul>	<ul style="list-style-type: none"> <li>Public road haulage of coal and bulk products to PKCT will not exceed 10 million tonnes per annum.</li> <li>Publication of annual throughput tonnes including in-loading method (i.e. road and rail received coal and bulk products).</li> <li>All trucks delivering coal and bulk products to PKCT must follow designated heavy vehicle transport routes.</li> <li>A driver’s code of conduct will be utilised for all transport companies delivering product to PKCT.</li> <li>Review effectiveness of truckwash facilities to be undertaken.</li> <li>Unless further or alternative Approval for NRE No 1 Colliery at Russell Vale is in place, PKCT will only receive coal from the NRE No 1 Colliery if that coal has been dispatched from that Colliery by public road between the hours of 7am to 10pm Monday to Friday and 8am to 6pm Saturday and Sunday or Public Holidays.</li> </ul>

A summary of actions undertaken across the 2018/2019 reporting period specific to this Statement of Commitments is presented below. Further details related to the Traffic and Transportation Statement of Commitments can be found under Section 5.2 of the AEMR.

- Coal throughput at PKCT and therefore road related transport returned to near long-term average levels this reporting period. Public road receipts for the reporting period were 2,013,213 tonnes.



- An AEMR is published on the PKCT website every 12 months, making throughput records publicly available. Additionally, real time throughput is available on PKCT’s website.
- PKCT and its associated road transport providers utilise an auditing program to ensure compliance with the PKCT DCC. This includes monitoring of trucks adherence to the specified travel routes.
- PKCT receives monthly DCC compliance reports from its transport providers who provide coal haulage for Wollongong Coal when operating. Wollongong Coal must ensure that coal is dispatched within the designated dispatch hours. The reports highlight any breaches to the designated dispatch hours. No breaches were reported to PKCT, or observed in the 2018/2019 reporting period.

**7.2 Statement of Commitments -Air Quality**

Objective	Commitment
<ul style="list-style-type: none"> <li>• Minimise dust emissions from activities carried out on the PKCT site.</li> </ul>	<ul style="list-style-type: none"> <li>• Installation of two continuous dust monitors to monitor airborne dust emissions.</li> <li>• Maintain appropriate dust suppression systems on site to effectively manage dust both on stockpiles and roadways.</li> </ul>

A summary of actions undertaken across the 2018/2019 reporting period specific to this Statement of Commitments is presented below. Further details related to the Air Quality Statement of Commitments are found under 5.3.4 Air Quality –Activities Undertaken During 2018/2019 Reporting Period.

- PKCT has two continuous dust monitors. These remained largely operational throughout the reporting period, with only minor recording issues resulting from an intermittent fault associated with the sampling pump – these issues were rectified at the time.
- PKCT has a preventative maintenance system in place (Works and Assets) which provides for the routine inspection and maintenance of environmental equipment including existing dust suppressions systems, stockpile sprays, truck wash and water cart. Operations shift teams monitor and operate the equipment and, where necessary, provide a breakdown response.

**7.3 Statement of Commitments -Water Management**

Objective	Commitment
<ul style="list-style-type: none"> <li>• Minimise use of potable water on site.</li> <li>• Effective management of on-site stormwater.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction of freshwater use on site to be achieved through the implementation of recycled water (Tertiary Treated Effluent) for dust suppression on stockpiles and other non-domestic uses e.g. fire,</li> </ul>





	spillage washdown, conveyor sprays. Staged approach to be implemented which will result in a 360 Megalitre per annum reduction by the end of 2010.
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A summary of actions undertaken across the 2018/2019 reporting period specific to this Statement of Commitments is presented below. Further details related to the Water Management Statement of Commitments are found under Section 5.5.4 Surface Water – Activities Undertaken During 2018/2019 Reporting Period of the AEMR.

- Recycled water use has continued at PKCT across the reporting period. Full details and summary of volumes are presented in Section 5.5.3 Trends in Surface Water Monitoring.

#### 7.4 Statement of Commitments -Noise Management

Objective	Commitment
<ul style="list-style-type: none"> <li>Responsible management of PKCT site operational noise.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that ongoing compliance is maintained to the NSW Industrial Noise policy.</li> <li>Development and implementation of a noise management plan for the PKCT site.</li> </ul>

By letter dated 16<sup>th</sup> March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued. Subsequently, PKCT undertook no noise monitoring surveys across the reporting period. Further details related to the Noise Management Statement of Commitments are found under Section 5.1 of the AEMR.

- PKCT continues to maintain and utilise Noise Management Plan MP.HS.387. The plan references the NSW Industrial Noise Policy. Relevant PKCT personnel have been made aware of the compliance requirement.

#### 7.5 Statement of Commitments -Community Relations

Objective	Commitment
<ul style="list-style-type: none"> <li>PKCT to be regarded as a responsible corporate citizen by the community.</li> </ul>	<ul style="list-style-type: none"> <li>Continued operation of the PKCT Community Consultative Committee</li> <li>Continued advertisement and operation of the telephone hotline.</li> </ul>

A summary of actions undertaken across the 2018/2019 reporting period specific to this Statement of Commitments is presented below.

- PKCT utilises its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. PKCT held two meetings within the reporting period on the 19<sup>th</sup> September 2018 and 22<sup>nd</sup> May 2019. PKCT will continue to hold these forums on a regular basis.



- PKCT received two community complaints associated with the operation during the reporting period. Details of these complaints are outlined under **Error! Reference source not found.**
- PKCT continues to utilise its telephone hotline. The hotline and general contact details for the site are located on the PKCT website, [www.pkct.com.au](http://www.pkct.com.au).

**7.6 Statement of Commitments – Environmental monitoring**

Objective	Commitment
<ul style="list-style-type: none"> <li>• To ensure compliance to the conditions of PKCT’s Department of the Environment and Climate Change licence.</li> </ul>	<ul style="list-style-type: none"> <li>• Development and implementation of a management plan which documents the environmental monitoring requirement of PKCT.</li> </ul>

PKCT has in place Environmental Monitoring Strategy MP.HS.464. The Strategy outlines the various monitoring requirements together with references to applicable management plans. General descriptions of PKCT monitoring and monitoring methodology are found throughout the AEMR. Figure 49 below outlines the sections of the AEMR describing Environmental Monitoring.

<i>Environmental Monitoring Area</i>	<i>Section of AEMR</i>
Noise	Section 5.1 Noise
Transport	Section 5.2 Transport
Air Quality	Section 5.3 Air Quality
Meteorological	Section 5.4 Meteorological
Surface Water	Section 5.5 5.5 Surface <b>Water</b>
Biodiversity	Section 5.6 Biodiversity
Visual Amenity	Section 5.7 Visual Amenity
Greenhouse Gas and Energy Efficiency	Section 5.8 Greenhouse and Energy Efficiency
Waste	Section 5.9 Waste
Hazards	Section 5.10 Hazards
Fire Control	Section 5.11 Fire Control

**Figure 49 : Environmental monitoring area and reference in AEMR**

**7.7 Statement of Commitments – Environmental Management System**

Objective	Commitment
<ul style="list-style-type: none"> <li>• PKCT to maintain certification o ISO 140001.</li> </ul>	<ul style="list-style-type: none"> <li>• PKCT will continue to be certified to ISO 14001 and will be externally audited against the certification criteria on an annual basis.</li> </ul>

A summary of actions undertaken across the 2018/2019 reporting period specific to this Statement of Commitments is presented below.



- PKCT successfully completed a comprehensive, five day ISO 14001 and ISO 9001 external recertification audit in January 2019. PKCT’s recertification, formally awarded in February 2019, is compliant to these latest ISO standards requirements. The ISO certificate is included in 11.7 Appendix G: ISO 14001 and 9001 Certificate.
- As previously reported, PKCT completed its triennial independent audit in April 2017. Findings from the audit are presented in 11.7 Appendix G: ISO 14001 and 9001 Certificate Independent Audit Findings. The next triennial independent audit will be required in 2020.

**7.8 Statement of Commitments – Greenhouse Gases**

Objective	Commitment
<ul style="list-style-type: none"> <li>• Minimise the production of greenhouse gas emissions associated with PKCT operations</li> </ul>	<ul style="list-style-type: none"> <li>• PKCT to review onsite electricity use and identify and implement economically viable opportunities for reduced electricity usage.</li> </ul>

PKCT undertook a greenhouse gas emission and energy use assessment of the Terminal following the Major Project Approval. The report found that PKCT’s use of electricity for powering coal handling infrastructure is by far the largest energy user. As a result, 97% of PKCT GHG emissions are Scope 2 emissions associated with electricity generated by power stations.

Opportunities for energy reduction are pursued when purchasing new equipment and considered when developing improvements.

Further details related to the Greenhouse Gas and Energy Efficiency Statement of Commitments can be found under Section 5.8.4 Energy Efficiency –Activities Undertaken During 2018/2019 Reporting Period.

**7.9 Statement of Commitments – Landscaping**

Objective	Commitment
<ul style="list-style-type: none"> <li>• Improve the visual amenity of PKCT on the surrounding community.</li> </ul>	<ul style="list-style-type: none"> <li>• Improve onsite soft landscaping through the planting of trees on the road receive earth bund and along the northern site boundary.</li> </ul>

With reference to the Landscape Management Plan MP.HS.460 (LMP), PKCT has developed a Landscape Concept Plan along the northern boundary. During this reporting period, maintenance of Stage 2 has continued and the area is now well established, see Figure 38 .

The nature and timing of further landscaping works requires consideration of major remedial works in development and PKCT’s strategic planning to ensure their compatibility. Refer to Section 5.7.4 Visual Amenity –Activities Undertaken During 2018/2019 Reporting



Period for details of the extensive plantings and landscaping works undertaken during this reporting period.

**7.10 Statement of Commitments – Flora and Fauna**

Objective	Commitment
<ul style="list-style-type: none"> <li>Management of Green and Golden Bell Frogs (GGBF)</li> </ul>	<ul style="list-style-type: none"> <li>Implement Interim Management Plan</li> <li>Undertake a GGBF Survey and then develop a Long Term Plan of Management.</li> </ul>

A Green and Golden Bell Frog Management Plan MP.HS.109 (GGBFMP) is in place. It was developed in consultation with the EPA and is DP&E approved.

A GGBF survey was undertaken by specialist consultants on 7<sup>th</sup> February 2019. No GGBF's were found on site.

Further details related to the Flora and Fauna Statement of Commitments can be found under 5.6.4 Biodiversity –Activities Undertaken During 2018/2019 Reporting Period.

**7.11 Statement of Commitments – Waste**

Objective	Commitment
<ul style="list-style-type: none"> <li>Minimise waste generated at the site to reduce the volume of waste requiring disposal to landfill.</li> <li>Prevent dispersal of waste from the site to receiving environments.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a Waste Management Plan for the site.</li> </ul>

PKCT has a Waste Management Plan MP.HS.459 (WSMP) which identifies the various waste streams generated at PKCT. The Plan outlines the methods used to minimise waste via reuse, recycling and suitable disposal of waste when necessary.

Further details related to the Waste Statement of Commitments are found under Section 5.9.4 Waste –Activities Undertaken During 2018/2019 Reporting Period.

**8.0 ENVIRONMENTAL PROTECTION LICENCE 1625**

PKCT holds EPL 1625 under the Protection of the Environment Operations Act 1997. This stipulates the emission criteria that PKCT must not exceed. Criteria are outlined for water, noise and dust. Pollution Reduction Programs (PRPs) are attached to the EPL to identify aspects which may require improvement.

PKCT is required to submit an Annual Return to the EPA reporting performance against licence requirements. The 2018/2019 Annual Return was submitted to the EPA via the online EPA “eConnect” system on the 27<sup>th</sup> May 2019.



As the specific criteria for water, noise and dust are common to both the EPL and Project Approval 08\_0009, all data and discussion associated with these criteria are outlined in other sections of the AEMR.

Figure 50 below provides a summary of the EPL conditions, Project Approval 08\_0009 requirements and the section of the AEMR that discusses the criteria.

Component	Reference area in Project Approval 09_0009	Reference area in EPL 1625	Relevant Section of AEMR
Noise	Schedule 3, Condition 1, Condition 2 and Condition 3.	Limit Condition L4, L4.1	Section 5.1 Noise
Air	Schedule 3, Condition 7, Condition 8, Condition 9 and Condition 10.	Monitoring and Recording Conditions M2, M2.1, M2.2	Section 5.3 Air Quality
Water	Schedule 3, Condition 12 and Condition 13.	Limit Condition L2, L2.1, L2.2, L2.3, L2.4 And Monitoring and Recording Condition M2.3.	Section 5.5 5.5 Surface <b>Water</b>

**Figure 50 : Common Requirements of Project Approval 08\_0009 and EPL1625**

**8.1 Other EPL Matters in the 2018/2019 Reporting Period**

- PKCT’s personnel were re-familiarised on PKCT’s Pollution Incident Response Management Plan and participated in desktop emergency drills during sessions in January 2019.
- PKCT has continued to update its website with monthly monitoring data summaries throughout the reporting period, see [www.pkct.com.au](http://www.pkct.com.au).
- During the reporting period, PKCT submitted an Annual Return as required under its Environmental Protection Licence (EPL). The EPL reporting period is different to the AMER Reporting Period being the period from 1st April 2018 to 31st March 2019. Three non-compliances to its EPL licence conditions were reported within the Annual Return. These are summarised below :-
  - PKCT operates two Osiris continuous dust monitors located to the north and south of the site. Across the period December 2018 to March 2019, intermittent, short duration pump issues occurred at monitoring site C1 "Southern Monitor". The issues manifested themselves as low points in the data trend. As the low data points were not outside of expected low data points, were intermittent, and the monitor was still operational it was difficult to identify the issues in real time. Between December 18 and March

19, two new pumps and a hire machine were installed to rectify the issue. As PKCT is required to have continuous monitoring, the issue was reported as a non-compliance within the Annual Return. PKCT sent the faulty pumps back to the manufacturer for investigation. The manufacturer has indicated that they have reviewed and made updates to the pumps. A new pump has since been installed.

- PKCT maintains a network of depositional dust gauges located on site and at various locations in the local community. PKCT depositional dust gauge site "P6-40m west coal berth stockyard" was found on the ground with a broken bottle in November 2018. It is likely that the gauge had been blown over from strong winds during the month. The sample could not be analysed as the bottle was broken. This sample was the only missed sample from a required 168 depositional dust gauge samples across the reporting period. PKCT's contractor in charge of collecting and analysing PKCT dust gauges completed a full review and repaired any other gauges likely to fail. As PKCT is required to undertake monthly samples from all 14 sample locations, the incident was reported as a non-compliance within the Annual Return.
- As outlined in Section 5.5.2.3 Surface Water Monitoring Compliance, PKCT had two non-compliant TSS discharges from LDP16 during the AEMR reporting period. As the first non-compliance fell within the Annual Return reporting period, it was discussed within the Annual Return. Details of this non-compliance are reported below;
  - PKCT received a formal warning letter from the EPA for a TSS exceedance at our Settling Lagoon Discharge Point LDP16 that occurred on the 15<sup>th</sup> March 2019 (TSS of 84mg/L against limit of 50mg/L). The exceedance occurred following a high intensity rainfall event on the evening of 14<sup>th</sup> March. A Formal Warning is the lowest formal response available to the EPA. Utilising our consultant, PKCT reviewed and tested the operation of the chemical dosing system and did not identify any equipment malfunctions that may have led to the non-compliance. It is possible that a change in water chemistry, perhaps including clays, may have contributed to the exceedance. PKCT has investigated and approved funding for installation of an additional chemical dosing system to assist with treating changes in water chemistry.
  - A further non-compliant TSS discharge from LDP16 on 5th June 2019 (outside the Annual Return Reporting Period) was reported to the EPA.
  - Both discharges occurred during heavy rainfall events and receiving waters were highly turbid during both discharges. No environmental harm was considered likely as a result, and the discharges were not considered "Material".



- PKCT continues to implement the EIP U4 Dust Management Environmental Improvement Program throughout the reporting period, and it is expected that project milestones will continue to be met during the coming year. Project EIP U4 involves the “Review Inbound Moisture Meters” - PKCT has reviewed the existing inbound rail moisture measures and developed a timeline to calibrate and implement the moisture meter into PKCT control system. In addition to this project, PKCT is investigating the viability of installing an additional moisture meter into the road receival system. When implemented, both moisture meters will assist PKCT in understanding the inbound moisture levels of coal through both road and rail systems, allowing for greater dust control.

## 9.0 RESULTS COMPARED TO THE ENVIRONMENTAL ASSESSMENT 2008

An environmental assessment was undertaken as part of PKCT’s application associated with Project Approval 08\_0009 and submitted to the DPE in a report titled “Environmental Assessment- Existing Operations and increased Road Receival Hours for Port Kembla Coal Terminal 2008” (EA).

This EA focussed on the key environmental issues of PKCT proposal to increase road deliveries to 24/7 for a maximum of 10mtpa. It has also addressed secondary environmental issues to ensure there was a rigorous review of PKCT’s existing and proposed operations. It showed that existing and proposed PKCT operations have a small environmental footprint, which is minimised through existing environmental impact mitigation measures. The assessment included predictions for environmental aspects such as noise and dust.

Monitoring results obtained over the 2018/2019 reporting period align with predictions made in the EA. Traffic and noise studies undertaken associated with PKCT’s application to the DPE for 7.5 MTPA to 10 MTPA approval also aligned.

Air quality monitoring results are compared to the predictions of the EA in Section 5.3 of the AEMR.

## 10.0 COMPLAINTS

Schedule 4, Condition 4d requires PKCT to include a summary of the complaints received during the past year and compare this to complaints received in previous years. Figure 51 shown below, provides a summary of complaints recorded at PKCT and reported to PKCT by road transport providers.

PKCT received two complaints across the 2018/2019 reporting period, refer to **Error! eference source not found.** for details.

As can be seen in Figure 51, total complaints made to PKCT have remained relatively consistent at a low level since FY13/14. PKCT continues to record all complaints in its Event Management System and responds appropriately when a complaint is received. PKCT



continues to work with its shippers and road transport providers to ensure complaints are recorded and handled appropriately.

Complaints	Number of Complaints recorded by PKCT						
	FY12/13	FY13/14	FY14/15	FY15/16	FY16/17	FY17/18	FY18/19
General (PKCT)	3	0	2	0	0	1	2
Drivers Code of Conduct related	20	5	3	0	0	0	0
Total	23	5	5	0	0	1	2

**Figure 51 : PKCT and DCC complaints.**

**11.0 CONCLUSION**

This Annual Environmental Management Report (AEMR) identifies PKCT’s approval and licence conditions and explains how PKCT complies with these requirements. It meets the specific AEMR requirements in Major Project Approval 08\_0009 Condition 4 of Schedule 4.

This AEMR demonstrates that PKCT has undertaken appropriate actions to manage its environmental impacts with the overall aim of minimising harm to the environment. This report forms part of PKCT’s environmental management system which is directed by PKCT’s Environmental Management Strategy. PKCT provides this AEMR to the DP&E and other stakeholders using information taken from environmental monitoring, assessment and reporting activities undertaken on a regular basis through the reporting period.

This AEMR does not raise any concerns regarding the ongoing ability of PKCT to comply with environmental requirements in the Major Project Approval, Environment Protection Licence 1625 and other regulatory requirements. Further, this AEMR confirms PKCT’s commitment to continual improvement in the mitigation of environmental impacts.



**11.1 Appendix A: Drivers Code of Conduct Summary**

Monthly Reports Summary FY 18/19	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	FY18/19 Total	Comment
Tonnes - Public Road	149,942	150,115	143,834	196,818	114,304	128,772	167,869	189,181	155,249	158,584	247,614	210,931	2,013,213	
Tonnes - Private Road	252,073	179,169	324,976	318,665	273,115	251,221	302,008	175,988	87,540	163,048	314,630	268,626	2,911,059	
Total road tonnes	402,015	329,284	468,810	515,483	387,419	379,993	469,877	365,169	242,789	321,632	562,244	479,557	4,924,272	
Spillage - Public Road	0	0	0	0	0	0	0	0	0	0	0	0	0	No spills reported by shippers or road transport providers
Incident - Other	0	1	0	0	0	1	1	1	1	0	0	0	5	
Impact with other vehicle	0	0	2	0	0	0	0	0	0	0	1	0	3	
Incidents Reported to RTA	0	1	1	1	0	0	0	0	1	0	0	0	4	
Complaints	0	0	0	0	0	0	0	0	0	0	0	0	0	Note: complaints related to DCC only
EPL/ regulatory breaches	0	0	0	0	0	0	0	0	0	0	0	0	0	
Inductions (%)	100	100	100	100	100	100	100	100	100	100	100	100	1	
Hours restrictions breach	0	0	0	0	0	0	0	0	0	0	0	0	0	
Road Transport Providers (RTP): Observations	101	76	96	80	94	69	71	66	69	45	42	13	822	
RTP: Number of drivers observed	85	82	78	69	74	61	68	42	54	59	45	6	723	
RTP: Trucksafe/NHVAS/Other Audits	4	4	8	7	12	12	10	8	8	0	0	0	73	
CTO / Audits at mine sites (Shippers & PKCT)	1	0	0	0	2	0	1	0	0	0	0	0	4	Includes data from Shippers and PKCT
CTO / Audits: At PKCT (Shippers & PKCT)	2	4	1	1	8	1	1	0	0	9	27	17	71	Includes data from Shippers and PKCT
CTO / Audits: Mine to PKCT (Shippers & PKCT)	1	0	0	0	3	0	1	0	0	0	0	0	5	Includes data from Shippers and PKCT
RTP system audits	0	0	0	0	0	0	0	0	0	0	0	0	0	

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## 11.2 Appendix B : Consultant Dust Data Summary

Table 10 Exceedances of the 24-hour average TSP trigger level of 90 µg/m³ at the northern PKCT monitoring site during the July 2018 to June 2019 reporting period

Date of exceedance	24-hour average TSP concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels <sup>a</sup>	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration <sup>b</sup>			Wind speed (m/s) <sup>c</sup>	
				µg/m³	%	Rating	Maximum	Average
19 October 2018	130.3	Unlikely	5.6	1.6	1	Minimal	4.6	2.0
20 October 2018	159.8	Unlikely	20.8	10.9	7	Minimal	4.6	2.0
14 November 2018	95.1	Unlikely	4.9	0.9	1	Minimal	2.6	1.4
15 December 2018	93.4	Unlikely	22.2	See table note e			6.5	2.1
16 December 2018	143.9	Unlikely	0.7	See table note e			6.4	2.9
17 December 2018	150.6	Possible	34.0	See table note e			4.3	2.0
30 December 2018	109.1	Unlikely	13.9	See table note d		None	3.7	1.3
4 January 2019	101.3	Unlikely	0.7	See table note e			4.3	2.2
5 January 2019	101.9	Possible	65.3	See table note d		None	8.4	3.9
16 January 2019	138.7	Unlikely	24.3	15.5	11	Minor	3.9	2.0
17 January 2019	92.8	Possible	31.3	10.9	12	Minor	5.6	2.7
26 January 2019	96.3	Possible	59.0	2.6	3	Minimal	5.8	2.5
30 January 2019	117.9	Unlikely	2.8	0.9	1	Minimal	4.2	1.9
31 January 2019	94.8	Possible	37.5	See table note d		None	10.9	3.8
4 February 2019	90.0	Unlikely	13.9	3.5	4	Minimal	5.4	2.0

Table notes:

<sup>a</sup> Identified using scatter plots of 10-minute average TSP concentration versus wind direction and wind speed

<sup>b</sup> Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern TSP concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average TSP concentration (0% = no cont, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)

<sup>c</sup> Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period

<sup>d</sup> For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site

<sup>e</sup> Data for average southerly PM<sub>10</sub> and TSP concentrations were unavailable for these exceedance periods

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Table 11 Exceedances of the 24-hour average PM<sub>10</sub> air quality standard of 50 µg/m<sup>3</sup> at the northern PKCT monitoring site during the July 2018 to June 2019 reporting period

Date of exceedance	24-hour average PM <sub>10</sub> concentration (µg/m <sup>3</sup> )	Likelihood of PKCT contributing to exceedance levels <sup>a</sup>	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration <sup>b</sup>			Wind speed (m/s) <sup>c</sup>	
				µg/m <sup>3</sup>	%	Rating	Maximum	Average
16 October 2018	54.2	Unlikely	0.0	0.0	0.0	None	7.2	3.6
17 October 2018	59.5	Unlikely	1.4	0.2	0.3	Minimal	4.9	2.6
18 October 2018	52.3	Unlikely	2.8	0.3	0.6	Minimal	5.3	2.5
19 October 2018	95.9	Unlikely	5.6	1.1	1.2	Minimal	4.6	2.0
20 October 2018	118.0	Unlikely	20.8	7.7	6.6	Minimal	4.6	2.0
5 November 2018	53.8	Unlikely	9.7	3.5	6.6	Minimal	4.3	1.7
14 November 2018	68.1	Unlikely	4.9	0.4	0.6	Minimal	2.6	1.4
9 December 2018	55.8	Unlikely	12.5	1.3	2.4	Minimal	4.1	2.0
15 December 2018	68.2	Unlikely	22.2	See table note e			6.5	2.1
16 December 2018	106.6	Unlikely	0.7	See table note e			6.4	2.9
17 December 2018	108.6	Possible	34.0	See table note e			4.3	2.0
29 December 2018	64.8	Unlikely	19.4	3.3	5.2	Minimal	5.3	2.6
30 December 2018	80.3	Unlikely	13.9	See table note d			3.7	3.7
31 December 2018	52.7	Unlikely	1.4	0.3	0.5	Minimal	3.8	1.9
4 January 2019	75.0	Unlikely	0.7	See table note e			4.3	2.2
5 January 2019	76.4	Possible	65.3	See table note d			8.4	8.4
15 January 2019	58.2	Unlikely	0.0	0.0	0.0	None	5.3	2.8
16 January 2019	100.1	Unlikely	24.3	10.7	10.7	Minor	3.9	2.0
17 January 2019	66.7	Possible	31.3	7.1	10.6	Minor	5.6	2.7
25 January 2019	63.1	Unlikely	6.3	1.0	1.6	Minimal	5.2	2.4
26 January 2019	69.7	Unlikely	59.0	0.9	1.3	Minimal	5.8	2.5
30 January 2019	85.0	Unlikely	2.8	0.5	0.6	Minimal	4.2	1.9

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Date of exceedance	24-hour average PM <sub>10</sub> concentration (µg/m <sup>3</sup> )	Likelihood of PKCT contributing to exceedance levels <sup>a</sup>	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration <sup>b</sup>			Wind speed (m/s) <sup>c</sup>	
				µg/m <sup>3</sup>	%	Rating	Maximum	Average
31 January 2019	68.5	Possible	37.5	See table note d			10.9	10.9
2 February 2019	54.8	Unlikely	16.7	1.4	2.6	Minimal	2.6	1.5
4 February 2019	64.4	Possible	13.9	2.4	3.7	Minimal	5.4	2.0
8 February 2019	52.4	Unlikely	4.2	0.4	0.8	Minimal	4.3	2.0
5 March 2019	64.1	Unlikely	2.8	See table note d			4.4	4.4
6 March 2019	54.3	Unlikely	32.6	See table note d			7.6	7.6

Table note:

<sup>a</sup> Identified using scatter plots of 10-minute average PM<sub>10</sub> concentration versus wind direction and wind speed

<sup>b</sup> Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern PM<sub>10</sub> concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average PM<sub>10</sub> concentration (0% = no cont, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)

<sup>c</sup> Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period

<sup>d</sup> For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site

<sup>e</sup> Data for average southerly PM<sub>10</sub> and TSP concentrations were unavailable for these exceedance periods

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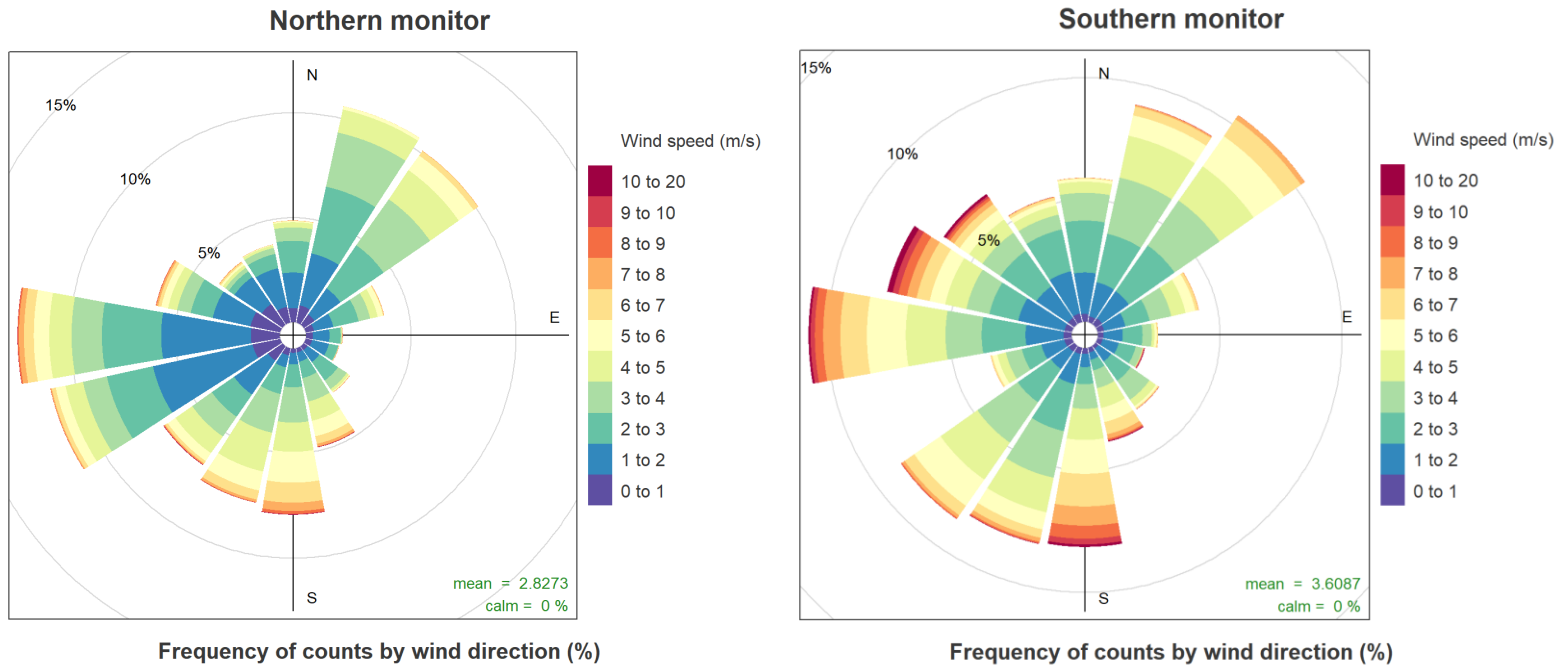
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11.3 Appendix C: PKCT Annual Wind Summary



#### 11.4 Appendix D: LDP16 Discharge Data Summary

Date	pH (pH Units)	TSS (mg/litre)	Oil and Grease (mg/litre)
05/07/2018	7.7	<5	not visible
No overflows from LDP16 in August 2018			
03/09/2018	9.8	12	not visible
04/09/2018	9.9	12	not visible
05/09/2018	10.0	16	not visible
06/09/2018	10.2	19	not visible
07/09/2018	10.2	30	not visible
08/09/2018	9.3	14	not visible
13/09/2018	9.4	10	not visible
20/09/2018	9.8	15	not visible
21/09/2018	9.8	12	not visible
04/10/2018	10.0	15	not visible
05/10/2018	9.4	16	not visible
08/10/2018	8.3	6	not visible
09/10/2018	7.9	5	not visible
10/10/2018	7.7	<5	not visible
11/10/2018	7.9	<5	not visible
15/10/2018	9.6	12	not visible
03/11/2018	10.3	16	not visible
07/11/2018	10.1	21	not visible
08/11/2018	9.7	11	not visible
13/11/2018	10.0	22	not visible
16/11/2018	10.4	26	not visible
17/11/2018	9.3	23	not visible
27/11/2018	10.8	28	not visible
28/11/2018	9.8	38	not visible
29/11/2018	8.9	28	not visible
30/11/2018	9.2	21	not visible
07/12/2018	9.2	13	not visible
14/12/2018	9.3	10	not visible
15/12/2018	8.2	14	not visible
20/12/2018	8.1	17	not visible
23/12/2018	7.3	8	not visible
26/12/2018	7.9	5	not visible
06/01/2019	7.8	8	not visible
09/01/2019	8.8	9	not visible
10/01/2019	8.1	<5	not visible
11/01/2019	7.8	<5	not visible
12/01/2019	7.7	<5	not visible



15/01/2019	8.4	<5	not visible
23/01/2019	9.9	7	not visible
31/01/2019	8.3	9	not visible
05/02/2019	9.5	17	not visible
06/02/2019	9.4	10	not visible
07/02/2019	9.7	21	not visible
09/02/2019	8.2	12	not visible
10/02/2019	7.9	12	not visible
11/02/2019	8.7	6	not visible
13/02/2019	9.0	5	not visible
22/02/2019	9.4	15	not visible
28/02/2019	9.9	22	not visible
05/03/2019	9.9	15	not visible
06/03/2019	10.1	11	not visible
07/03/2019	9.8	9	not visible
08/03/2019	9.6	7	not visible
12/03/2019	9.8	17	not visible
13/03/2019	9.5	11	not visible
14/03/2019	9.6	22	not visible
15/03/2019	8.2	84	not visible
18/03/2019	7.9	12	not visible
19/03/2019	7.0	12	not visible
20/03/2019	7.6	14	not visible
21/03/2019	7.6	7	not visible
22/03/2019	7.7	<5	not visible
23/03/2019	7.4	<5	not visible
28/03/2019	7.8	<5	not visible
30/03/2019	7.6	8	not visible
31/03/2019	7.9	7	not visible
04/04/2019	9.7	6	not visible
05/04/2019	8.2	6	not visible
23/04/2019	10.2	29	not visible
24/04/2019	10.5	19	not visible
25/04/2019	10.0	16	not visible
01/05/2019	9.4	48	not visible
02/05/2019	10.1	28	not visible
03/05/2019	9.8	14	not visible
05/05/2019	9.6	17	not visible
04/06/2019	10.0	36	not visible
05/06/2019	7.9	97	not visible
07/06/2019	7.6	40	not visible
13/06/2019	7.9	11	not visible
16/06/2019	7.1	<5	not visible

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17/06/2019	7.7	40	not visible
18/06/2019	7.4	26	not visible
24/06/2019	7.5	29	not visible
25/06/2019	7.3	27	not visible
30/06/2019	7.4	6	not visible



11.5

Appendix E: Weed Spraying Notification Form

**Notification of Weed Spraying**


**Johnsons Landscapes**

Date	12/9/18	12/9/18
Person/s Responsible	Mick Wedd	
Area to be sprayed	ADMIN	
Start time	12-30pm	
Estimated duration	2 HOURS	
Weather	FINE NE WIND 10km/h	
Frog and Wildlife Inspection	<input checked="" type="radio"/> Yes / No	
General Comments	NO FROGS	
Total amount of litres sprayed	30LTS	
Type of spray used	Glycophosate 360 (Trademark Roundup) <input checked="" type="radio"/> Yes / No	
Other Type of spray used		

**SIGN OFF: WORK COMPLETED**

Date: 12 9 18

Time: 2.45

Signature:  Print Name: M WEDD



11.6 Appendix F: Triennial Independent Audit Findings and Action Plan

**AECOM INDEPENDENT EXTERNAL AUDIT 2014: PKCT RESPONSE TO RECOMMENDATIONS AND ACTION PLAN PROGRESS  
JUNE 2016**

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
DA 08_0009, S2.C7	<p>The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been dispatched between the hours of:</p> <p>a) 7 am to 10 pm Monday to Friday; and</p> <p>b) 8 am to 6 pm Saturday and Sunday or Public Holidays unless in accordance with a project approval granted to that Colliery under Part 3A of the EP&amp;A Act.</p>	<p>An Opportunity for Improvement was identified during the 2014 IEA relating to updating the Drivers Code of Conduct (DCC) so that the obligations within the DCC align with the Conditions of Approval in particular to truck dispatch times from the NRE No 1 Colliery at Russell Vale. In response, PKCT reported in its 2015 / 2016 AEMR (p.109) that the DCC was updated in August 2014.</p> <p>A review of the DCC (version 6 dated 30.11.15) confirmed that the Drivers Summary Sheet (within the DCC) outlines the permitted travel times and notes that <i>'despatch of road haulage of coal from Wollongong Coal No.1 mine via Bellambi road is permitted to PKCT between 7am and 10 pm Monday to Friday, and 8am to 6pm on Saturday and Sunday or public holidays.'</i></p> <p>Toolbox talk records relating to a refresher of the PKCT DCC were sighted dated August 2016 and April 2017.</p> <p>It was reported that the NRE No 1 Colliery has an electronic boom gate which does not open until 7 am.</p> <p>Trucks have electronic monitors that enable tracking of the date, time and speed that the trucks entered and exited the site, the trip distance and the location. An activity report by vehicle is sent to the manager on a monthly basis (sighted example for one vehicle for period 5.05.2016 to 26.05.16). A review of this activity record did not indicate any instances where that vehicle entered or exited the NRE No.1 Colliery outside of the permitted hours.</p> <p>Monthly checks of compliance with the DCC were being undertaken by PKCT using the <i>'PKCT Task Coach &amp; Observation Sheet: Truck Drivers Code of Conduct'</i>. This form includes a specific check of whether truck arrivals were adhering to time restrictions and specifically noting that coal from the NRE No 1 Colliery can only be dispatched between the hours of 7am and 10 pm Monday to Friday, and 8am to 6pm on Saturday and Sunday or public holidays. Sighted completed forms dated 25.04.14, 26.12.15, 26.04.16, 6.05.16, 20.06.2016 and 21.12.16. Not</p>	<p>Compliant</p> <p><b>OFI-2017 06:</b> PKCT to introduce a procedure to request/ review and record compliance of movements of trucks along Bellambi Road at regular intervals when coal receive from the NRE No.1 Colliery re-commences.</p>	<p>Finding accepted.</p> <p><b>OFI-2017 06:</b> PKCT will work with its Shipper and associated Truck Company to implement a process to monitor compliance of truck movements along Bellambi Lane during coal transport to the Terminal.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/08/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>DCC Monthly reports were updated to include some extra detail on recording driver compliance to Bellambi Lane</p>

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		<p>all of these forms included the check of the time restrictions. Where that section was completed, no issues had been identified.</p> <p>It was reported that there has been no coal received from the NRE No 1 Colliery in the last 12 months.</p>		requirements.
DA 08_0009, S2.C13	<p>Operation of Plant and Equipment</p> <p>The Proponent shall ensure that all plant and equipment used on site is:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p>	<p>The work order and maintenance system was observed during the site inspection. The work order and maintenance system manages how pollution control equipment is managed. Work Orders for the water system were observed to include sump float and pump control inspections as well as the truck wash.</p> <p>It was reported that inspection regimes are based on the equipment manual or design instructions. Maintenance and inspection work was scheduled and work orders issued to shift tradespersons or to the Asset Maintenance Team where work is carried out by contractors.</p> <p>The work order system excludes truck maintenance, though PKCT has interface with truck companies and coal shippers with regard to truck maintenance. Feedback regarding the condition of equipment is recorded in the work order system to track the depletion of equipment and track supply needs. PKCT has an alarmed digital control system which tracks the operation/capacity of equipment.</p> <p>The following non-compliances with the requirement of EPL 1625 relating to the maintenance and operation of plant and equipment were reported in the 2014 / 2015 and 2015 / 2016 Annual Returns:</p> <ul style="list-style-type: none"> <li>1 April 2014 to 31 March 2015 - A sump pump failed to start automatically that resulted in an overflow to Port Kembla harbour during a storm event. The pump was reported to have been started manually and operated without further problems. PKCT installed a new switch and implemented corrective actions.</li> <li>1 April 2015 to 31 March 2016 - A transfer pump at Tower 3 Pond failed to operate resulting in surface water overflow to Port Kembla harbour. A portable pump was installed and the fault was reported to have been addressed. PLC upgrades at time contributed to software problem. PLC system upgraded.</li> </ul>	<p>Non-compliant</p> <p>Low Risk</p>	<p>Finding accepted.</p> <p>PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has implemented remedial measures to limit the potential of future occurrences.</p> <p>PKCT continues to operate in alignment with its approved Policies, Procedures and Management Plans. PKCT continues to maintain accreditation to ISO14001 and ISO9001.</p> <p>The events and</p>

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		<p>A training presentation dated October 2014 was observed. The training included a review of EPL monitoring requirements and the actions required by tower operators and coordinators as well as sampling requirements.</p> <p>A meeting invite dated 28 October 2014 included an agenda item for 'environmental sampling'.</p> <p>An email from the Environmental Specialist to shift managers on 12 November 2014 noted that the Water Sampling Procedure had recently been updated.</p> <p>On the basis of the non-compliances with the equivalent condition of the EPL reported in the 2014 / 2015 and 2015 / 2016 Annual Returns, this condition has been assessed as non-compliant.</p>		<p>associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> <p><b>July 2018 Action Status: Complete</b></p>
DA 08_0009, S3.C2	<p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <p>a) be developed in consultation with DECC;</p> <p>b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and</p> <p>c) include a:</p> <ul style="list-style-type: none"> <li>- combination of attended and</li> </ul>	<p><u>Preparation</u></p> <p>The Noise Management Plan (NMP) was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014) assessed that the requirements of the plan were met and that the plan was prepared in consultation with the relevant agencies.</p> <p>The NMP was last updated on the 16.04.14 (Version 8). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>The previous IEA (AECOM, 2014) recommended that the Noise Management and Monitoring Plan included a discussion on the appropriateness of using the BarnOwl noise monitoring system.</p> <p>The Plan was revised and Section 4 (Noise monitoring) and Appendix B of the NMP now includes a discussion of the suitability and limitations of the BarnOwl noise monitoring system.</p> <p>Since the last revision of the NMP, PKCT has, in consultation with the DP&amp;E, ceased to conduct bi-annual noise monitoring (refer S3.C2 above). It is recommended that the NMP is revised to reflect this change to the noise monitoring protocol.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the NMP.</p>	<p>Preparation: Compliant</p> <p><b>REC-2017-09</b> - Revise the NMP with the following improvements:</p> <ul style="list-style-type: none"> <li>- Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken.</li> <li>- Consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of maximum noise levels) in any future</li> </ul>	<p>Finding accepted.</p> <p><b>REC-2017-09</b> - PKCT will revise the Noise Management Plan to reflect that the by-annual noise monitoring is no longer required.</p> <p>The revised Management Plan will be updated with information outlining that PKCT will consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of</p>

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	<p>unattended noise monitoring measures;</p> <ul style="list-style-type: none"> <li>- noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval; and</li> <li>- reasonable and feasible best practice noise mitigation measures to ensure project specific noise criteria are met.</li> </ul>	<p><u>Implementation</u></p> <p>In general, it was considered that the NMP was being implemented. Refer also to S3.C3 below.</p>	<p>noise compliance surveys</p> <p>Implementation: Compliant</p>	<p>maximum noise levels) in any future noise compliance surveys.</p> <p>PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p>
DA 08_0009, S3.C3	<p>Continuous Improvement</p> <p>The Proponent shall:</p> <ul style="list-style-type: none"> <li>a) continue to implement all reasonable and feasible best practice noise mitigation measures;</li> <li>b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and</li> </ul>	<p>Noise mitigation measures outlined in the NMP include:</p> <ul style="list-style-type: none"> <li>• Rail receipt enclosed within a shed.</li> <li>• Road and Rail Receipt conveyors initially underground then enclosed within conveyor galleries and transfer stations.</li> <li>• Truck driver rules and the Drivers Code of Code covering requirements relating to driver practices, in particular compression braking and speed control.</li> <li>• Job planning and risk assessment processes are in place which gives consideration to health, safety, environmental and community impacts ensuring aspects such as noise are identified, considered and suitable controls are put in place.</li> </ul> <p>The rail receipt shed and enclosed conveyors were observed during the site inspection.</p> <p>The Drivers Code of Conduct Implementation Plan and Drivers Code of Conduct Monthly Reports for the audit period were reviewed. The Monthly Reports include a 'Checklist of Key</p>	<p>Compliant</p> <p><b>OFI-2017-07</b> – Consider investigating ways to control and/or manage potential noise from the metal tubes installed at the truck wash area alerting drivers to lower their trailers.</p>	<p>Finding accepted</p> <p><b>OFI-2017-07</b> –The hanging metal tubes at the Northern Truckwash are a key safety device used to warn trucks that their trays are elevated before they return onto the public road network.</p> <p>PKCT will investigate the hanging metal</p>

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	c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director General.	<p>Operational Focus Areas' which include the focus area of Noise Minimisation Controls.</p> <p>One noise enquiry was received by PKCT from a nearby resident during the audit period. The enquiry related to trucks use of compression braking in the middle of the night. In response, PKCT requested its acoustic consultants to undertake additional monitoring (as part of the half yearly monitoring undertaken in April 2016) to assess the noise impact of trucks entering and leaving the site and along the road network. Noise monitoring was undertaken between 11:45pm -12:00am and 2.10-2.25 am and the results assessed against the determined screening criteria for sleep disturbance (<math>L_{A1,1 \text{ min}}</math>). The assessment concluded that although audible at times, the events measured were below the sleep disturbance screening criterion and that it is unlikely that events from PKCT would cause awakening reactions. PKCT requested the transport companies re-communicate the requirements and undertake driver monitoring to ensure compression braking at the Springhill Rd/ Port Kembla Rd intersection is not occurring. The enquiry was followed up with the resident to their satisfaction.</p> <p>No other enquiries or complaints relating to noise were recorded during the audit period.</p> <p>Site visit (10 April 2017) identified potential noise nuisance associated with dangling chain/metal tubes at the truck wash area to alert truck drivers to lower their trailers (refer to photo in main report). The wind was causing the metal tubes to hit each other which may create a noise issue, particularly at night-time, at nearby residential receivers. PKCT could investigate ways to control and/or manage this issue (e.g. chains/metal tubes to be spaced further apart).</p> <p>The AEMRs were noted to include a discussion of the activities undertaken during the reporting period related to noise as well as the planned activities for the upcoming reporting period. The 2015 / 2016 AEMR reported that "as part of the Upgrade Project, PKCT engineers have a system in place to investigate and consider best practice noise mitigation options during the design and purchase of new equipment. These processes have been utilised across the reporting period while planning replacement Stackers and Reclaimers"</p>		<p>tubes at the Northern Truckwash to assess whether noise levels associated with them may be problematic.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/12/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>A capital Project has been incorporated into the 2019 Project list that is looking to install laser systems to prevent trucks striking overhead structures. An additional laser will be installed outbound on the truckwash Gantry or the tubes will be refurbished during this project.</p>
DA 08_0009, S3.C8	<p>Operations</p> <p>The Proponent shall:</p> <p>a) ensure any visible air pollution</p>	<p>The operation of the PKCT terminal is managed with the input of a range of meteorological data from on-site and off-site meteorological stations. The monitoring is undertaken as follows:</p>	<p>Compliant</p> <p><b>OFI-2017-08</b> - Consider modifying the display to</p>	<p>Finding accepted.</p> <p><b>OFI-2017-08</b> - PKCT will work with its IT</p>

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	<p>generated by the project is both minimised and recorded, and that operations are modified as required to minimise any resultant air quality impacts on nearby residences;</p> <p>b) ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and</p> <p>c) where dust is generated by the project, that operations are modified and/or stopped as required to ensure compliance with the relevant air quality criteria to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> <li>• Prior to each morning shift, the daily forecast is checked from the Bureau of meteorology to identify whether there are any strong winds forecast and in particular wind from the south. When necessary this allows the planning of the day's activities and preparation of the water gun programs.</li> <li>• Meteorology from the on-site meteorological station is displayed in the control room via an alert screen (see below)</li> </ul>	<p>align the north on the maps with north on the displays.</p>	<p>consultant to investigate and if possible modify the existing screen display interface to align the north on the maps with north on the displays.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete</b></p> <p>Screen layout was reviewed and current layout was considered acceptable.</p>

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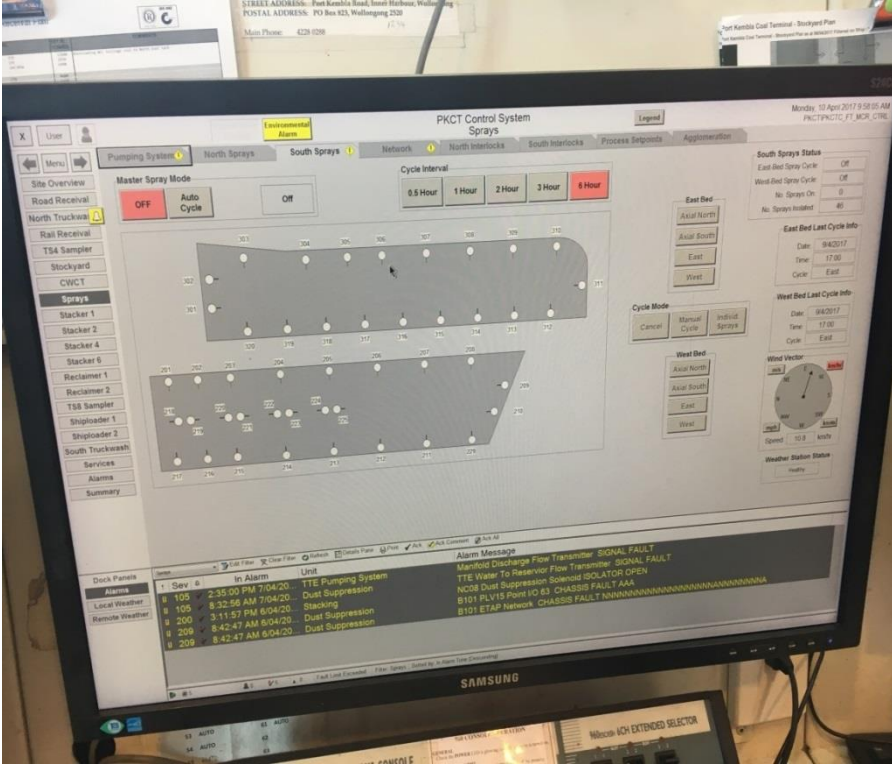
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		<p>A minor recommendation for the display is to align the north on the maps with north on the displays. The display shown could be misinterpreted as the North arrow is facing west across the site.</p> <p>A range of triggers have been set in place to control the water guns that are linked to the meteorological monitoring. The control screen (showing part of the stockyard area and recent</p>		



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		<p>records of activations is shown below.</p>  <p>Real time monitoring data is displayed in a number of locations throughout the site and was examined daily to ensure results have a comment accompanying the monitoring data describing the day. The data was compiled in the central dust monitoring database outlined under DA 08_0009, S3.C7. This includes information on the spray cycles used daily and any conditions that may influence the measurement of dust on the site.</p>		



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		<p>PKCT uses EMS to record environmental observations such as visible dust events. A review of an extract from the EMS for the audit period confirmed that instances of observed dust emissions were identified, investigated and recorded.</p>		
<p>DA 08_0009, S3.C12</p>	<p>SURFACE WATER Discharge Limits</p> <p>Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>A number of non-compliances with the EPL were reported during the audit period and therefore this condition has been assessed as non-compliant.</p> <p>Refer to assessment of compliance with L1.1 and L2.1 of the EPL.</p>	<p>Non-Compliant Medium Risk</p>	<p>Finding accepted.</p> <p>PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has implemented remedial measures to limit the potential of future occurrences.</p> <p>Specifically in response to early non-compliances with water quality at the Terminal, PKCT has implemented the following during the audit period;</p> <ul style="list-style-type: none"> <li>• Completion of a \$3.04 million upgrade to the Central Pond</li> </ul>

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				<ul style="list-style-type: none"> <li>• Completion of a dredging program in the Settlement Lagoon</li> <li>• Testing and installation of a coagulant dosing facility at the Central Pond to assist with water clarification of highly turbid water if/when it occurs on site.</li> <li>• Installation of a belt washing station on Berth 102 Conveyor 14 which has significantly reduced coal spillage on the Berth</li> </ul> <p>The above improvements along with other initiatives have helped PKCT to improve and maintain discharge compliance from the Settlement Lagoon (LDP16) for 1144 days (as of end of</p>

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				<p>June 2018).</p> <p>PKCT considers that these improvements have been effective at improving compliance with Condition S3.C12.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> <p><b>July 2018 Action Status: Complete.</b></p>
DA 08_0009, S3.C13	<p>Water Management Plan</p> <p>The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director- General. This Plan must:</p> <p>a) be prepared in consultation with DECC;</p> <p>b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and</p> <p>c) include:</p>	<p><u>Preparation</u></p> <p>The Water Management Plan (WMP) was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014) assessed that the requirements of the plan were met and that the plan was prepared in consultation with the relevant agencies.</p> <p>The WMP was last updated with in November 2016 (Version 8). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>Since the last review of the WMP there have been a number of upgrades to the water management system on site. Most notably the upgrade to the Central Pond as required by Pollution Reduction Program 12 (since removed from the EPL as it was assessed as completed by the EPA). The Central Pond Upgrade Project included improvements to the pond layout, capacity, pumps and inflow management. The current WMP does not reflect these upgrades.</p> <p>The WMP includes a site water balance as Attachment A. The water balance model calibration was conducted for the period 1 April 2009 to 10 February 2010. Given recent</p>	<p>Preparation: Compliant</p> <p><b>REC-2017-13</b> – Review the WMP to reflect recent upgrades to water management on site, in particular the Central Pond Upgrade Project. This review should include a review and revision (where necessary) of the site water balance and be submitted to the Director General for approval.</p>	<p>Findings accepted.</p> <p><b>REC-2017-13</b> - PKCT will revise the Water Management Plan to reflect the upgrades made to the Central Pond and include a revision if necessary of the site water balance. PKCT will submit the revised Plan to the Director General for approval within three months of submission</p>

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	<ul style="list-style-type: none"> <li>- a site water balance, which includes details of sources of water supply, on-site water use and management and off-site water discharges and investigates and describes measures to minimise water use by the project;</li> <li>- a sediment control plan for surface works on the site that is consistent with the requirements of the Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004, or its latest version);</li> <li>- a surface water monitoring program that includes:                             <ul style="list-style-type: none"> <li>i. stormwater effluent discharge criteria;</li> <li>ii. a monitoring protocol for</li> </ul> </li> </ul>	<p>upgrades to the Central Pond, including sealing of a previously unsealed area, and the age of the site water balance model calibration AECOM consider that the site water balance should be reviewed and to confirm input and output parameters are still relevant.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the WMP.</p> <p><u>Implementation</u></p> <p>A thorough assessment of the implementation of all aspects of the WMP was not undertaken as part of this audit, however in general it was considered that the WMP was being implemented:</p> <ul style="list-style-type: none"> <li>• Water quality monitoring was being undertaken (refer assessment EPL L2.1 and M2.3)</li> <li>• Collection ponds were being maintained (refer O4.2)</li> <li>• The water collection system was computer controlled by the Main Control Room</li> <li>• Incidents were being recorded in PKCT's Event Management System (EMS)</li> </ul> <p>The WMP states erosion and sediment control plans will be prepared where surface works are proposed with potential for sediment contaminated run-off to leave PKCT's premises. The auditors sighted an example of an Environmental Management Plan prepared by the contractors contracted to undertake a restoration and compliance project involving berm extensions, SPMT roads and ST7 Construction Area works. The Plan outlined the environmental management measures to be implemented during the construction works associated with the project and included a section on soil and water management. The Appendix included an Environmental Control Plan which marked up the locations of silt fences, sand bags, stockpiles, stormwater pits and the sediment basin.</p> <p>It is noted a few non-compliances with discharge criteria have been recorded (refer L1.1 and L2.1 of the EPL) however these were predominately related to incidents or storm events. There have been no exceedances of concentration limits since mid-2015. On the basis that systems were in place to manage surface water and monitor its effectiveness, this condition has been assessed as compliant.</p>	<p><b>REC-2017-14</b> Update the WMP with the following improvements:</p> <ul style="list-style-type: none"> <li>- Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements.</li> <li>- Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625.</li> </ul>	<p>of the audit report.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>WMP was updated and sent to DP&amp;E via email on 12/09/2017.</p> <p><b>REC-2017-14</b> - PKCT will revise the Water Management Plan to</p> <ul style="list-style-type: none"> <li>- Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements.</li> <li>- Clearly identify the water storage structures that</li> </ul>

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	<p>evaluating Compliant with the stormwater effluent discharge criteria; and</p> <p>iii. reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met.</p>		<p>- Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16.</p> <p>Implementation: Compliant</p>	<p>relate to the LDPs specified in EPL 1625.</p> <p>- Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>WMP was updated and sent to DP&amp;E via email on 12/09/2017.</p>
DA 08_0009, S3.C18	<p>Greenhouse and Energy Efficiency Plan</p> <p>Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare</p>	<p><u>Preparation</u></p> <p>The previous IEA (AECOM, 2014) assessed that the requirements of the GHG&amp;EE Management Plan were met. The Plan was last updated with minor amendments in December 2016 (Version 9). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p>	<p>Preparation: Compliant</p> <p><b>REC-2017-15</b> – Revise the GHG&amp;EE Management Plan to reflect that the Energy Savings Action</p>	<p>Finding accepted.</p> <p><b>REC-2017-15</b> – PKCT will revise the Greenhouse Gas and Energy Efficiency</p>

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	<p>and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared generally in accordance with the Guidelines for Energy Savings Action Plans (DEUS 2005, or its latest version);</li> <li>b) be submitted to the Director-General for approval;</li> <li>c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;</li> <li>d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;</li> <li>e) describe how the performance of these measures would be monitored over time; and</li> <li>f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.</li> </ul>	<p>The previous IEA (AECOM, 2014, p.a-6) recommended that the GHG&amp;EE Management Plan should be reviewed and updated "at least annually so that the document reflects the current state of operation on site. In particular, the Plan needs to include reference to the most recent relevant legislation, NGERs data and a summary of information gathered through the Energy Savings Action Plans".</p> <p>This recommendation was implemented and the plan was being reviewed annually. Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the GHG&amp;EE Management Plan.</p> <p>It is noted that the NSW Department of Energy, Utilities Sustainability (DEUS) no longer exists and energy efficiency is managed by OEH. Additionally the Energy Savings Action Plan program is no longer enforced. OEH has developed new programs to assist businesses in NSW to achieve greater resource efficiency and more environmentally sustainable work practices.</p> <p><u>Implementation</u></p> <p>As stated in the Plan, PKCT has very low level of Scope 1 GHG emissions. The majority of its emissions are Scope 2 GHG emissions as a result of electricity use (97.4% of emissions). The plan identifies some measures to minimise Scope 1 emissions e.g. reduce diesel and petrol use of PKCT vehicles, ensure efficient use of oils and gases during maintenance, ensure efficient use of acetylene etc. These were generally being implemented. It was reported that the conveyors were the main contributor to electricity consumption. It was also reported that during the planning phase, the Projects Team undertake a review of the efficiency of new plant and machinery.</p> <p>PKCT receives detailed monthly electricity bills identifying usage which is transferred into a spreadsheet by the Environmental Specialist and used for analysing trends and AEMR reporting.</p> <p>AEMRs include greenhouse gas and energy efficiency information and include trends concerning reportable energy.</p> <p>The 2013/2014 AEMR (p.46) notes that "Overall, the kWh/tonnes for the 2013/2014 reporting period was marginally above the baseline energy efficiency target of 1.655kWh/tonne (1.68kWh/tonne) which is comparable to the 2012/2013 financial year".</p>	<p>Plan Program has ended and identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions and energy use.</p> <p><b>REC-2017-16-</b> Revise the GHG&amp;EE Management Plan with the following improvements:</p> <ul style="list-style-type: none"> <li>- Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered.</li> <li>- Update the GHG&amp;EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest</li> </ul>	<p>Management Plan to reflect that the Energy Savings Action Plan Program has ended and identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions and energy use. PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b> GGEEMP was updated and sent to DP&amp;E via email on 12/09/2017.</p> <p><b>REC-2017-16-</b> PKCT will revise the Greenhouse Gas and Energy</p>

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Date Authorised: 30.7.19



Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		<p>The 2014/2015 AEMR (p.48) notes that <i>“Reportable energy consumption and greenhouse gas emissions have slightly increased at PKCT this reporting period”</i>.</p> <p>The 2015/2016 AEMR (p.46) states that <i>“The 2015/2016 reporting period saw nine months where monthly kWh/tonne exceeded the baseline energy efficiency target. These records correspond with low throughput months, in particular during the months of November, December and January”</i>.</p> <p>Under the Energy Savings Action Plan Program, PKCT were required to submit annual reports. PKCT sought confirmation from OEH on whether it was still required to submit these. OEH responded that the Energy Savings Action Plan Program has ended and that PKCT has met the requirements of the program and is no longer required to report (email dated 08.08.14).</p> <p>In general it was considered that the GHG&amp;EE was being implemented. A thorough assessment of the implementation of all aspects of the management plan was not undertaken as part of this audit.</p>	<p>emissions factors are used.</p> <ul style="list-style-type: none"> <li>- Include further details within the GHG&amp;EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured.</li> </ul> <p>Implementation: Compliant</p>	<p>Efficiency Management Plan to reflect the recommendations of REC-2017-16.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>GGEEMP was updated and sent to DP&amp;E via email on 12/09/2017.</p>
DA 08_0009, S3.C20	<p>HAZARDS</p> <p>Dangerous Goods</p> <p>The Proponent shall ensure that storage, handling and transport of dangerous goods are done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.</p>	<p>The AEMRs state that PKCT is aware of all dangerous goods onsite and ensures personnel are suitably trained to handle these and that there is suitable site storage in accordance with AS1940 &amp; AS1596.</p> <p>PKCT has an Acknowledgement of Notification of Hazardous Chemicals on Premise from SafeWork NSW dated 29.08.16 due to the quantities of compressed gas exceeding the manifest quantity.</p> <p>During the site inspection an approximately 6,000 L tank of the flocculent Coreshell 71303 was observed to be stored in a non-bunded area near the Settling Lagoon. As this product is not a dangerous good it is not covered by AS1940 and AS1596 and the Dangerous Goods Code. A review of the SDS indicates that the product has been characterised as having ‘high’ potential environmental hazard due to its ecotoxicological effects. The SDS states that the product should be stored in a suitably labelled container which is tightly closed and stored</p>	<p>Compliant</p> <p><b>OFI-2017-09</b> – Investigate the option of providing secondary containment for the flocculent Coreshell 71303 tank to offer additional protection from accidental release to the harbour</p>	<p>Finding accepted</p> <p><b>OFI-2017-09</b> - PKCT will investigate options for providing secondary containment for the flocculent Coreshell 71303 tank to offer additional protection from accidental release to the harbour. If a feasible option is identified, PKCT will</p>

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		<p>separately from oxidisers. The product was observed to be stored in accordance with the SDS requirements, however given the high environmental hazard PKCT could investigate the option of providing secondary containment for the tank to offer additional protection from accidental release to the harbour.</p> <p>The 2015 / 2016 AEMR reported the following with regards to hazards monitoring:</p> <ul style="list-style-type: none"> <li>PKCT now has a dedicated, bunded storage area for used oily consumables to be placed prior to removal from site by a licence contractor. This was sighted during the site inspection.</li> <li>Regular environmental auditing is undertaken in the Main Store and Workshop areas to ensure compliance with relevant standards. The auditors sighted examples of Environmental Task Observation: Workshop and Store Areas dated 5.08.14; 26.02.15; 13.08.15; 23.03.16 and 17.11.16 as well as a screen shot of the EMS showing the list of 'Critical Task Observations' related to the Workshop and Store Area, the date, current stage (close, investigated) and assigned user. A review of this list confirmed observations were carried out regularly (usually at least monthly) during the audit period.</li> <li>During the 2015/2016 reporting period, PKCT engaged a consultant to identify and assess PKCT's current dangerous goods storage and handling processes for operational effectiveness and compliance to current legislation. The audit identified some improvement opportunities around storage/bunding of empty oil drums and a flocculent container. The auditors reviewed the report provided by Priority Group dated 09.02.16. It is noted this review was undertaken by a consultant associated with STOREMASTA, a dangerous goods / industrial storage sales company. In response, PKCT added the polymer storage tank at the Settlement Lagoon to its Aspects and Impacts register for ongoing tracking.</li> <li>PKCT continues to utilise a mobile refueling system for its plant machinery and does not store any fuel on site. The auditors confirmed this was still the case.</li> </ul>		<p>include the item in the FY19 Capital Expenditure budget and implement the improvements during that financial year.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date:</p> <ol style="list-style-type: none"> <li>Completion of review of secondary containment options 31/12/2017.</li> <li>Feasible option to be implemented during FY19 financial year.</li> </ol> <p><b>July 2018 Action Status: Complete.</b></p> <p>Investigations into area bunding and double shelled tanks are complete.</p>
DA 08_0009,	ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND	<u>Preparation</u>	Preparation: Compliant	Findings accepted

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S4.C1	<p>REPORTING</p> <p>Environmental Management</p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:</p> <p>a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General;</p> <p>b) provide for the strategic context for the environmental management of the project;</p> <p>c) identify the statutory requirements that apply to the project;</p> <p>d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>- keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>- receive, handle,</li> </ul>	<p>PKCT prepared an Environmental Management Strategy which was submitted to the DP&amp;E by letter dated 29.07.10. Formal approval of the Strategy from the DP&amp;E could not be located but was assumed to have been received during the first IEA audit period.</p> <p>The Strategy has since been revised (Version 9, 15.10.15). The revised Strategy was not submitted for Director-General re-approval as the changes were considered by PKCT to be immaterial.</p> <p>Refer to Section 9 of the main report for an assessment of the adequacy of the Strategy.</p> <p><u>Implementation</u></p> <p>PKCT’s Environment Management System has been certified to AS/NZS ISO 14001:2004 Environmental Management Systems standard. In maintaining its certification, the site undergoes surveillance audits on a six monthly basis. The auditors reviewed the most recent ISO 14001:2004 Surveillance Audit undertaken by Lloyd’s Register LRQA on the 19 &amp; 20 October 2016.</p> <p>PKCT also implements an internal audit program. The auditors sighted the Internal Audit Program for 2016-2018 which includes a schedule of ISO certification, Asset Management, Operations, DP&amp;E Independent Audit, Planning and New projects, ISO V BMS Check, Business Services, Engineering and Environmental Management audits.</p> <p>The auditors sighted examples of Environmental Task Observation: Workshop and Store Areas dated 5.08.14; 26.02.15; 13.08.15; 23.03.16 and 17.11.16. These observations reviewed the standard of housekeeping in the workshop and store areas and included checks of the drains on roadways, storage of hydrocarbons and chemicals, oil leaks, general waste bins, uncontained spills and spill kits. The auditors also sighted a Task Observation Sheet: Environment for the Berth Areas, Ship – Dust, Dirty Water Discharge &amp; Spillage Control completed on the 23.01.17 and one for the Main Control Room completed on the 16.02.17.</p> <p>PKCT maintain an Aspects and Impacts Register (as an Excel workbook). The register includes a number of spreadsheets including FY17 Environmental Improvement Plan (EIP) and FY17 EIP Actions.</p> <p>Complaints were being managed as outlined in the Strategy (refer EPL M5.1) for further</p>	<p><b>REC-2017-12</b> - Revise the Environmental Management Strategy with the following improvements:</p> <ul style="list-style-type: none"> <li>- Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation.</li> <li>- Update Table 9-1 to reflect changes to noise monitoring and to include requirements relating to monitoring of sediment levels in ponds and train wagon condition monitoring</li> <li>- Update Table 9-2 to reflect recent changes to reporting requirements e.g. remove requirements to</li> </ul>	<p><b>REC-2017-12</b> – PKCT will revise the Environmental Management Strategy to include the recommendations listed under REC-2017-12.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>EMS was updated and sent to DP&amp;E via email on 12/09/2017.</p>

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Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	<p>respond to, and record complaints;</p> <ul style="list-style-type: none"> <li>- resolve any disputes that may arise during the course of the project;</li> <li>- respond to any non-Compliant;</li> <li>- manage cumulative impacts; and</li> <li>- respond to emergencies;</li> </ul> <p>e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval;</p> <p>f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and</p> <p>g) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.</p>	<p>discussion of complaint management process).</p> <p>PKCT has developed an Incident Investigation and Reporting procedure (PR.HS.124). Incidents were being reported, investigated and closed out using PKCT's EMS. The auditors reviewed an extract of EMS for the audit period for all the events categorised as 'Environmental'. It was considered that the EMS was well utilised with over 100 events logged for the audit period ranging from small oil leaks, dust plumes, coal spillages and water discharges. The EMS includes a field for 'Notification Type' which has the following options:</p> <ul style="list-style-type: none"> <li>• Minor – PKCT internal, routine via EMS</li> <li>• Minor - PKCT internal, manager contacted</li> <li>• Not material – EPA notification may be required</li> <li>• Material – EPA notification required</li> </ul> <p>There are also categories for 'Risk Ranking Potential Consequence' (low, moderate, high) and 'Potential Consequence Severity (Level 1, 2, 3 and 4).</p> <p>Whilst the Notification Type includes a trigger for potential EPA notification, other than if it has been noted within the event summary there is no way of determining which events have actually been notified to the EPA.</p> <p>Environmental monitoring of dust, water discharges, water usage, electricity, greenhouse gas, waste, noise, activity, rainfall, pollutants, green and golden bell frogs, complaints, incidents and cooling tower was being implemented as outlined in the Strategy (refer to specific conditions within this Appendix).</p> <p>Reporting was being implemented as outlined in the Strategy (AEMRs, EPL Annual Returns, EPL monthly reports, National Pollution Inventory).</p> <p>The Strategy was being reviewed on an annual basis as specified within the Strategy.</p> <p>In general it was considered that the Strategy was being implemented. A thorough assessment of the implementation of all aspects of the Strategy was not undertaken as part of this audit.</p>	<p>report against Energy and Water Savings Plans, and to provide Interim Environmental Management Reports (no longer required), include requirements for Ambient Air Monitoring Report, Wet Weather Overflow Reporting and Train Condition Exception Reporting required by the EPL.</p> <p>Implementation: Compliant</p> <p><b>OFI-2017-01:</b> Include a field in EMS for recording whether events have been notified to the EPA and other relevant agencies</p>	<p><b>OFI-2017-01:</b> PKCT will investigate options to update the EMS system interface to include a field for events that have been notified to the EPA.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date:</p>

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				31/10/2017 July 2018 Action Status: Complete. EMS system was reviewed and existing mandatory item in EMS was deemed sufficient as a prompt to identify if regulator notification was required.
DA 08_0009, S4.C2	REPORTING Incident Reporting Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.	PKCT reported four incidents to the EPA Environment Line during the audit period relating to discharges of washdown water containing coal fines into Port Kembla harbour. The incidents were not considered to have caused material harm by PKCT. In response, the EPA issued two Formal Warnings and noted that whilst the incidents did not cause measureable environmental harm they had the potential to cause measureable environmental harm to the waters of Port Kembla. These incidents were not reported to the DP&E and other relevant agencies (other than the EPA) within 24 hours. The only reporting of these incidents to the DP&E was through the AEMR.	Non-compliant Low risk REC-2017-01: Ensure that incidents that cause or have the potential to cause material harm to the environment are also reported to the DP&E and other relevant agencies	Finding accepted PKCT has a Pollution Incident Response Management Plan (PIRMP) in place that outlines the requirements of reporting any event that causes, or may cause, Material Harm to the environment to the relevant agencies. REC-2017-01: PKCT will ensure that any future incidents are assessed as per the requirements of the PIRMP and reported as required to the relevant agencies. A communication email

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Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
			(in addition to the EPA) within 24 hours.	will be sent to relevant personnel reminding them of this requirement.  Action by: PKCT Environmental Specialist  Completion Date: email to be sent by 30/06/2017.  <b>July 2018 Action Status: Complete</b>  Email sent to relevant managers and superintendents outlining requirements of PIRMP reporting and location of PIRMP.
DA 08_0009, S4.C4	Annual Reporting Within 12 months of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-General and all relevant agencies. This report must: (a) identify the standards and performance measures that apply to project; (b) describe the works carried out	Annual Environmental Management Reports (AEMRs) and Interim AEMRs were available for the periods 2013 / 2014, 2014 / 2015, 2015 / 2016. A letter from the DP&E dated 25 March 2014 noted that the Department had reviewed the 2013/2014 AEMR and was generally satisfied with the report noting that future AEMRs should include: <ul style="list-style-type: none"> <li>• Comparison of the monitoring results for noise and air quality with the results from the previous years; and</li> <li>• Identify any trends in noise, air quality and waste monitoring.</li> </ul> A letter from the DP&E dated 12.08.14 stated that the 2014 / 2015 AEMR generally satisfies	Compliant <b>OFI-2017-10</b> - Ensure that future AEMRs include: <ul style="list-style-type: none"> <li>• A map showing the regional context</li> <li>• A summary of any community engagement activities and</li> </ul>	Finding accepted <b>OFI-2017-10</b> - PKCT has received correspondence from the DPE requesting updates to the next AEMR.  PKCT's next AEMR is due by 31 <sup>st</sup> July 2017. PKCT will update the

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Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	<p>in the last 12 months;</p> <p>(c) describe the works planned to be carried out in the next 12 months;</p> <p>(d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;</p> <p>(e) include a summary of the monitoring results for the project during the past year;</p> <p>(f) include an analysis of these monitoring results against the relevant:</p> <ul style="list-style-type: none"> <li>– impact assessment criteria/limits;</li> <li>– monitoring results from previous years; and</li> <li>– predictions in the EA or other documents listed in condition 2 of schedule 2;</li> </ul> <p>(g) identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures;</p> <p>(h) identify any trends in the</p>	<p>Condition 4 of the approval and specifically noted that the report includes a comparison of the monitoring results for noise and air quality with the results from the previous years; and identification of any trends in noise, air quality and waste monitoring.</p> <p>A letter from the DP&amp;E dated 23.08.16 noted that the 2015 / 2016 AEMR generally satisfies Condition 4 of the approval however has not been prepared in consideration of the Department’s guideline for the <i>Post-approval requirements for State significant mining developments – Annual Review Guideline (2015)</i>.</p> <p>The letter requested that the next AEMR be updated to include:</p> <ul style="list-style-type: none"> <li>• A map showing the regional context</li> <li>• A summary of any community engagement activities and community contributions undertaken during the reporting period</li> <li>• Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis.</li> </ul>	<p>community contributions undertaken during the reporting period</p> <ul style="list-style-type: none"> <li>• Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis.</li> </ul>	<p>AEMR format to incorporate the recommendations made by the DPE.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/07/2017</p> <p><b>July 2018 Action Status: Complete</b></p> <p>AEMR was completed and submitted to DP&amp;E on 28/07/2017. AEMR included requests from Department.</p>

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	monitoring results over the life of the project; (i) identify any non-Compliant during the previous year; and (j) describe what actions were, or are being, taken to ensure Compliant.			
DA 08_0009, S4.C7	Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director- General.	<p>As recommended in the 2014 IEA, PKCT commenced undertaking annual reviews of its management plans. The annual reviews have reportedly not resulted in any material changes and as such the plans were not re-submitted to the DP&amp;E for approval.</p> <p>The auditors did not assess whether the changes made to the plans as a result of the 2014 IEA were significant enough to warrant re-submission of the plans to the DP&amp;E for approval.</p> <p>A review of the adequacy of the current management plans is provided in Section 9.0 of the main report. It is recommended that where plans are revised as a result of the IEA adequacy review they are submitted to the DP&amp;E for approval.</p>	Not verified  <b>REC-2017-07</b> – Where a review of the management plans results in significant changes, for example as a result of the adequacy review undertaken every three years as part of the IEA, the plans should be re-submitted to the DP&E for approval.	Finding accepted  <b>REC-2017-07</b> – PKCT will continue to review its Management Plans annually as per the recommendation of the 2014 IEA. If a review of a Management Plan results in significant changes to the intent of the Plan, PKCT will resubmit those plans to the DPE as required.  Action by: PKCT Environmental Specialist  Completion Date: As necessary if significant changes are made during review of any Management Plans.

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DA 08_0009, S4.C8	<p><b>ACCESS TO INFORMATION</b></p> <p>Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:</p> <p>(a) provide a copy of the relevant document/s to the relevant agencies;</p> <p>(b) place a copy of the document/s on its website; and</p> <p>(c) remove superseded copies of strategies/plans/programs from its website.</p>	<p>a) Previous IEA's assessed that the originally approved management plans were provided to the relevant agencies. Management Plans were being reviewed annually (as per previous IEA recommendation) however as the changes were not considered significant by PKCT they were not re-submitted for approval and the revised plans were not provided to the relevant agencies.</p> <p>PKCT received email confirmation from the DP&amp;E that relevant agencies include the EPA and Wollongong Council.</p> <p>The 2013 / 2014 AEMR was provided to the DP&amp;E by email dated 30.07.14 and the EPA, Wollongong City Council and NSW Department of Trade and Investment by emails dated 15.08.14.</p> <p>The 2014 / 2015 AEMR was provided to the DP&amp;E by email dated 28.07.15</p> <p>The 2015 / 2016 AEMR was provided to the DP&amp;E on the 28.07.16</p> <p>The 2014/2015 and 2015/2016 AEMRs were provided to the EPA and Wollongong City Council by emails dated 15.03.17.</p> <p>The 2014 IEA was provided to the DPE by email dated 9.05.14. Evidence that it was provided to the other relevant agencies was not available.</p> <p>b) PKCT's website has a dedicated 'Environment and Community page. This page contains links to the Environment Policy, Pollution Incident Response Management Plan and EPL. The Environmental Strategy and other environmental management plans were available on the website however where not easy to locate as they were listed under the 'News' page under the year 2010 (the year they were originally approved).</p> <p>The 'News' page also contained links to the EPL Monthly Reports and the AEMRs (2015 / 2016, 2014 / 2015 and 2013 / 2014). The 2011 IEA was available on the website (under 'News' '2011') however the 2014 IEA was not.</p> <p>The website was not considered easy to navigate and it was difficult to locate the relevant documents. A member of the public wanting to access the management plans and IEAs would</p>	<p>Non-compliant</p> <p>Low Risk</p> <p><b>REC-2017-02</b> - Ensure the website includes the most recent revisions of the Environmental Management Strategy and management plans.</p> <p><b>REC-2017-03</b> - Ensure the IEAs are published on the</p>	<p>Findings accepted.</p> <p><b>REC-2017-02</b> - PKCT will review all Management Plans and Strategies available on PKCT's website to ensure that they are the most recent versions of documents.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/06/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PKCT website was updated to new format and most recent Management Plans were included in the update</p> <p><b>REC-2017-03</b> - PKCT will update the website to include the</p>

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		<p>need to know the year that the plans were approved and the year the IEAs were conducted. The website would be greatly improved by a more intuitive website layout where all of the environmental information is located under the Community and Environment page with appropriate sub-headings for monitoring reports, AEMRs, independent audits etc.</p> <p>On the basis that not all of the required information was provided to all the relevant agencies and available on the PKCT website, this condition has been assessed as non-compliant.</p>	<p>website</p> <p><b>OFI-2017-04</b> –Consider changing the layout of the website to make it easier to navigate to the environmental management plans, monitoring reports, AEMRs and IEAs.</p>	<p>completed IEAs.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/06/2017</p> <p><b>July 2018 Action Status: Complete</b></p> <p>IEA's for 2011, 2014 and 2017 were added to the new format website.</p> <p><b>OFI-2017-04</b> – PKCT will review the layout of the existing website with our IT consultants and investigate an alternate layout for the Website to improve ease of navigation for the public.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: Review and upgrade</p>

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				<p>completed by 31/12/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PKCT website design was updated based n IC format and other coal terminals in Newcastle. A "Regulatory Documents" page has been added to the website that includes a list of all relevant legal documents and reports.</p>

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EPL 1625, L1.1	<p><b>LIMIT CONDITIONS</b></p> <p><b>Pollution of Waters</b></p> <p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>LDP 16 is the principle discharge point for the Site; however, there are a further five ‘wet weather discharge points’ on-site (refer to Condition P1.3, LDP 22, LDP 23, LDP 24, LDP 25 and LDP 26) and one pond (Northern Pond) that is not included in EPL 1625.</p> <p>LDP 16 (Settlement Lagoon) discharges into Garungaty Waterway that flows into Port Kembla Inner Harbour. Stormwater runoff from various sub-catchments drains into the six ponds located around the Site. In the event the six ponds overtop water is discharged into Port Kembla Harbour; however, dirty water stored in the ponds can be pumped, either via the Central Pond, or directly to the Settlement Lagoon (LDP 16). In addition to providing storage during storm events, settling of suspended sediments occurs in the satellite ponds prior to pumping to the Settlement Lagoon or the Central Pond. Water from the satellite ponds is transferred to the Settlement Lagoon where a flocculent is added to enhance settling of suspended solids. When the Settlement Lagoon is full, water discharges to Garungaty Waterway over an overflow weir. Water is also available for reuse on-site for road dust suppression. The following surface water management infrastructure is located on-site:</p> <table border="1"> <thead> <tr> <th></th> <th>Component</th> <th>LDP No.</th> <th>Catchment Area (ha)</th> <th>Volume (m<sup>3</sup>)</th> <th>Discharge to</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Settlement Lagoon</td> <td>LDP 16</td> <td>NA</td> <td>7,300</td> <td>Garungaty Waterway</td> </tr> <tr> <td>2</td> <td>TS1 Pond</td> <td>LDP 22</td> <td>4.3</td> <td>1,550</td> <td>Settlement Lagoon</td> </tr> </tbody> </table>		Component	LDP No.	Catchment Area (ha)	Volume (m <sup>3</sup> )	Discharge to	1	Settlement Lagoon	LDP 16	NA	7,300	Garungaty Waterway	2	TS1 Pond	LDP 22	4.3	1,550	Settlement Lagoon	<p>Non-compliant</p> <p>Medium Risk</p>	<p>Finding accepted.</p> <p>PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has liaised with the EPA and implemented remedial measures to limit the potential of future occurrences.</p> <p>Specifically in response to early non-compliances with water quality at the Terminal, PKCT has implemented the following during the audit period;</p> <ul style="list-style-type: none"> <li>• Completion of a \$3.04 million upgrade to the Central Pond</li> <li>• Testing and installation of a coagulant dosing facility at the Central Pond to</li> </ul>
	Component	LDP No.	Catchment Area (ha)	Volume (m <sup>3</sup> )	Discharge to																	
1	Settlement Lagoon	LDP 16	NA	7,300	Garungaty Waterway																	
2	TS1 Pond	LDP 22	4.3	1,550	Settlement Lagoon																	

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		<table border="1"> <tr> <td>3</td> <td>Central Pond</td> <td>LDP 23</td> <td>17.7</td> <td>7,480</td> <td>Settlement Lagoon</td> </tr> <tr> <td>4</td> <td>Tower Pond</td> <td>3 LDP 24</td> <td>2.90</td> <td>450</td> <td>Central Pond</td> </tr> <tr> <td>5</td> <td>Southern Pond</td> <td>LDP 25</td> <td>10.6</td> <td>7,700</td> <td>Central Pond</td> </tr> <tr> <td>6</td> <td>Workshop Pond</td> <td>LDP 26</td> <td>1.65</td> <td>370</td> <td>Settlement Lagoon</td> </tr> <tr> <td>7</td> <td>Northern Pond</td> <td>-</td> <td>13.2</td> <td>3,000</td> <td>Settlement Lagoon</td> </tr> </table> <p>PKCT reported the following pollution incidents to the EPA during the audit period.</p> <ul style="list-style-type: none"> <li>25-27 March &amp; 4-6 April 2014: Turbid water discharges following a severe storm event.</li> <li>5 June 2014: Pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm event.</li> <li>18 March 2015. During routine cleaning of Shiploader 1 over Coal Berth 102, a blocked launder pipe caused a backup of washwater to fall onto the maintenance bay below and then spill from the Shiploader into Port Kembla harbour.</li> <li>On 28 July 2015 a volume of wash-down water containing coal fines flowed into Port Kembla Harbour. PKCT did not consider the incident to cause 'material harm' but was reported to the EPA Environment Line on the same day (Event Number: C10033-2015). PKCT developed an Action Plan and provided this to the EPA in an email on 28 July</li> </ul>	3	Central Pond	LDP 23	17.7	7,480	Settlement Lagoon	4	Tower Pond	3 LDP 24	2.90	450	Central Pond	5	Southern Pond	LDP 25	10.6	7,700	Central Pond	6	Workshop Pond	LDP 26	1.65	370	Settlement Lagoon	7	Northern Pond	-	13.2	3,000	Settlement Lagoon		<p>assist with water clarification of highly turbid water if/when it occurs on site.</p> <ul style="list-style-type: none"> <li>Installation of a belt washing station on Berth 102 Conveyor 14 which has significantly reduced coal spillage on the Berth</li> <li>Upgrading of a launder system on Shiploader 1 to decrease blockages</li> </ul> <p>The above improvements along with other initiatives have helped PKCT to improve and maintain discharge compliance from the Settlement Lagoon (LDP16) for 749 days (as of end of May 2017) and other areas across the Terminal.</p> <p>PKCT considers that these improvements</p>
3	Central Pond	LDP 23	17.7	7,480	Settlement Lagoon																													
4	Tower Pond	3 LDP 24	2.90	450	Central Pond																													
5	Southern Pond	LDP 25	10.6	7,700	Central Pond																													
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		<p>2015. On 4 August 2015 PKCT received an email from the EPA indicating the EPA would be taking no further action concerning the incident.</p> <ul style="list-style-type: none"> <li>On 28 August 2015 water from Shiploader 1 flowed off the conveyor belt due to one of the ship's plugs not being in place resulting in water/slurry entering Port Kembla Harbour.</li> </ul> <p>PKCT was issued with a Formal Warning Letter by the EPA dated 25.07.14 for breaching its concentration limits as a result of the discharges in March / April 2014.</p> <p>The incident on the 5 June 2014 was deemed by the EPA to constitute a breach of this Condition and PKCT was issued with an Official Caution dated 10.09.14. In response, PKCT engaged an external consultant to review the pump arrangement and to identify practical modifications and or upgrades to the system. Upon completion of the review PKCT implemented the following upgrades:</p> <ul style="list-style-type: none"> <li>Blocking the RCP stockpile drain to prevent contaminated water inflow</li> <li>Repairing the western containment wall of the stockpile where required to prevent seepage</li> <li>Diverting the flow from No.1 Berth South Position Pump 17 towards T3 Pond</li> <li>Installing new power supply cable, communication cable and ultrasonic level detector, in the pump 09 sump with communications including alarms and monitoring to the Main Control Room</li> </ul> <p>The incident on the 18 March 2015 was deemed by the EPA to constitute a breach of this Condition and PKCT was issued with a Formal Warning dated 3.09.15. In response PKCT reviewed the Shiploader Launder design and implemented modifications. The</p>		<p>have been effective at improving compliance with Condition EPL L1.1.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> <p><b>July 2018 Action Status: Complete.</b></p>

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		<p>new arrangement is considered by PKCT to be less prone to blockages and includes a water supply connection which can be used to clear accumulated material.</p> <p>PKCT was also issued with a Formal Warning (dated 19.07.16) in relation to a breach of L1.1 for the two shiploader incidents in July and August 2015.</p> <p>In addition, PKCT identified a number of exceedances of its TSS and pH criteria at Licenced Discharge Point (LDP) 16. These are discussed further under Condition L2.1.</p> <p>On the basis of the above incidents and exceedances, this condition has been assessed as non-compliant. It is noted that PKCT has since implemented a number of improvements to its surface water management system (discussed further under L1.2 below) and that no incidents causing or threatening material harm to the environment were reported in 2016.</p>		
EPL 1625, L2.1 &  L2.4	<p><b>Concentration Limits</b></p> <p>For each monitoring/discharge point or utilisation area specified in the table below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p> <p>Water and/or Land Concentration Limits:</p> <p><b>Point 16</b></p>	<p>The following non-compliances were noted concerning concentration limits for the audit period:</p> <p><u>2014:</u></p> <ul style="list-style-type: none"> <li>Five TSS limit non-compliances were recorded at LDP 16 on the following dates:                             <ul style="list-style-type: none"> <li>4 April 2014 = 110 mg/L, 6 April 2014 = 96 mg/L, 14 August 2014 = 77 mg/L, 18 November 2014 = 69 mg/L and 20 November 2014 = 52 mg/L.</li> </ul> </li> </ul> <p><u>2015:</u></p> <ul style="list-style-type: none"> <li>Four TSS limit non-compliances were recorded at LDP 16 on the following dates:                             <ul style="list-style-type: none"> <li>1 May 2015 = 60 mg/L, 10 May 2015 = 57 mg/L, 12</li> </ul> </li> </ul>	<p>Non-compliant</p> <p>Low risk</p>	<p>Finding accepted</p> <p>Refer to finding EPL 1625, L1.1 for response.</p> <p><b>July 2018 Action Status: Complete.</b></p>

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	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>100 Percentile Concentration Limit</th> </tr> </thead> <tbody> <tr> <td>Oil &amp; Grease</td> <td>Visible</td> <td>Not Visible</td> </tr> <tr> <td>Total Suspended Solids</td> <td>Milligrams per litre</td> <td>50</td> </tr> </tbody> </table>	Pollutant	Unit of Measure	100 Percentile Concentration Limit	Oil & Grease	Visible	Not Visible	Total Suspended Solids	Milligrams per litre	50	<p>May 2015 = 110 mg/L and 13 May 2015 = 54 mg/L.</p> <p>There were no exceedances recorded in 2016 and up until the 10 April 2017. Additionally there were no exceedances of the oil and grease criteria during the audit period.</p> <p>Improvements to the water management system have been conducted under PRP 12 – <i>Implement Upgrades to Stormwater Pollution Control System</i>. Completion of the Central Pond upgrade works was completed in January 2016. EPL 1625 was varied by notice 1548264 issued on 16 January 2017 with removal of PRP 12 'Implement Upgrades to Stormwater Pollution Control System'. The EPA received the effectiveness review from PKCT titled <i>PKCT Central Pond Upgrade, Pollution Reduction Program 12, Stage 1(e) Review of Environmental Performance of the Upgrade Works</i>. The EPA reported in a Notice of Variation dated 16 January 2017 (Ref: EF13/3447) that <i>"The works have allowed isolation of chambers and inflows to the pond, giving PKCT the ability to effectively manage sediment levels in the pond. This has been reflected in the water quality of the Central Pond, as well as the downstream Settlement Lagoon"</i>. The EPA considered that Stage 1(e) had been completed. The recent upgrades to the Central Pond were observed during the Site inspection. The PKCT Upgrade Report (p.5) reported that <i>"measured monthly TSS average pre-upgrade [in the Central Pond] was 202 mg/L and as of June 2016 79 mg/L post upgrade"</i>. EPL 1625 discharge criteria is 50 mg/L.</p> <p>Other activities and improvements noted to the stormwater system during the reporting period included:</p> <ul style="list-style-type: none"> <li>Installation of a coagulant dosing system at the Central Pond in August 2015. The system uses a coagulant injected into the Central Pond which mixes with the water as it is</li> </ul>		
Pollutant	Unit of Measure	100 Percentile Concentration Limit											
Oil & Grease	Visible	Not Visible											
Total Suspended Solids	Milligrams per litre	50											

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		<p>transferred through to the Settlement Lagoon. Once in the Settlement Lagoon, the mixture assists with removal of ultrafine particles that are not removed by the existing polymer dosing system at the Settlement Lagoon.</p> <ul style="list-style-type: none"> <li>• A dredging program was undertaken in August 2015 and September 2015 in the Settlement Lagoon. The program utilised a suction cutter dredge feeding a wet-slurry into a network of geotextile bags. The bags allowed water to escape while trapping and storing sediment for later removal. Ongoing monitoring is required; however, Site management reported an improvement in water clarity as well as a reduction in the TSS levels of discharge water since dredging was completed. Site management also reported that use of the geotextile bags allows scheduled cleaning of the Settlement Lagoon regardless of the weather conditions.</li> <li>• An unsealed area near the Central Pond Pump was sealed in February 2016.</li> <li>• Isolation of inflows into ponds allows for drying of slurry.</li> <li>• Sealing of entry/exit ramps into ponds minimises sediment 'drag' out of the ponds and onto internal roadways.</li> </ul> <p>It is acknowledged that PKCT has made improvements to the stormwater system that have facilitated recent compliance with EPL 1625 criteria; however, given the above exceedances during the audit period this condition was found to be non-compliant.</p>		
EPL 1625, O1.1	<p><b>OPERATING CONDITIONS</b></p> <p><b>Activities Must be Carried out in a Competent Manner</b></p> <p>Licensed activities must be carried out in a competent manner. This includes:</p>	<p>PKCT has established processes for managing the processing, handling, movement and storage of coal including:</p> <ul style="list-style-type: none"> <li>• 24 /7 site operational control via the Main Control Room which includes monitoring of site conditions and weather forecasts and operating sprays and other controls as required,</li> </ul>	<p>Non-compliant</p> <p>Low risk</p>	<p>Findings accepted</p> <p>PKCT accepts that the item of non-compliance associated with this finding occurred as a</p>

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	<p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<ul style="list-style-type: none"> <li>Under wagon monitoring to detect poorly loaded trains.</li> <li>Spillage recovery systems and processes to recover as much product coal as possible</li> <li>Event Management System for the investigation and corrective action of incidents and complaints</li> </ul> <p>The EPA undertook a compliance audit of PKCT's rail unloading facility on the 30.05.14. The audit identified a non-compliance related to coal particles on wagon surfaces and coarse coal particles and lumps of coal on wagon bodies. This was considered a breach of this Condition by the EPA and was subsequently included as a non-compliance with O1.1 in PKCT's 2014-15 Annual Return. PKCT developed an Action Plan which was submitted it to the EPA and included as Attachment B of the 2014-15 Annual Return. The EPA undertook a follow up inspection on the 28.08.15 to assess the implementation status of corrective actions from the first audit. PKCT provided the EPA with an update of the status of the action plan by email dated 4.09.15. The EPA provided PKCT with comments on its assessment of the status of corrective actions by letter dated 29.09.15. In its letter the EPA acknowledged the actions taken by PKCT represent significant steps towards constituting reasonable and practical measures to minimise or prevent fine coal deposition on the exterior of wagons. However the EPA was still concerned with parasitic coal on the exterior of wagons being unloaded. An Environmental Improvement Program (EIP) for Wagon Monitoring and Reporting was included in PKCT's EPL. This was completed by PKCT by the 30.09.16 and removed from its EPL. An EIP for Train Condition Exception Reporting was included in the EPL (refer U3.1).</p> <p>Given the non-compliance with this condition identified during the audit period by the EPA, this condition has been assessed as non-compliant. However it is noted that since this time, PKCT</p>	<p><b>REC-2017-04</b> – Request from waste contractor that it provides the destination of waste taken off site.</p>	<p>result of a rail audit that occurred early in the reporting period. PKCT has worked with the EPA and put processes in place, including an ongoing Environmental Improvement Program (EIP), to minimise the likelihood of further non-compliances at the rail unloading facility.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion date: EIP ongoing</p> <p><b>REC-2017-04</b> - PKCT will request from the current waste provider information relating to the destination of all waste taken off site. PKCT will update the current monthly waste report to include this information.</p> <p>Action by: PKCT Environmental Specialist</p>

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		<p>has implemented a number of improvement measures relating to coal storage, handling and movement, in particular monitoring of wagons and therefore the risk level is considered low.</p> <p>PKCT has developed a Waste Management Plan which outlines how PKCT manage the waste generated by its activities. The Waste Management Plan (p.8) notes that waste shall be kept separate, shall be contained and disposed of in accordance with legal requirements and that waste generated on-site shall be managed to reuse on site in the first instance, followed by offsite recycling or reuse and as a last resort sent off site for disposal.</p> <p>General site waste was managed by waste contractor Veolia during the audit period. Veolia provide PKCT with a 'Waste Contract Monthly Report' that summarises the volume / mass and type of waste removed from site for either disposal, reprocessing or recycling. The reports do not include details of the destinations of the waste taken offsite (either for recycling or disposal). However Transport Certificates for trackable waste (J120 waste oil / hydrocarbons mixtures / emulsions in water) which is taken to Veolia's Camelia facility are provided to PKCT. PKCT also has dockets of the scrap metal recycling (taken to T&amp;D Metals and Demolitions, Unanderra). Veolia holds an EPL for waste transporter activities and has numerous premises licensed to accept waste.</p> <p>Evidence of waste segregation was observed during the audit site inspection. Separate bins for scrap metal recycling and cardboard recycling were observed. A battery recycling facility was installed in 2015 (sighted).</p> <p>Waste oils were reportedly transported back to the Workshop and deposited into dedicated waste oil intermediate bulk containers (IBCs) (sighted during audit site inspection).</p>	<p><b>OFI-2017-05</b> – Update Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.</p>	<p>Completion Date: 31/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Waste contract provider sent August 2017 report which included final destination of waste for Cardboard and for general waste.</p> <p><b>OFI-2017-05</b> – PKCT will update the Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Management Plan was updated and submitted via email to DP&amp;E on 12/09/2017.</p>

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EPL 1625, O2.1	<p><b>Maintenance of Plant and Equipment</b></p> <p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	Refer to DA 08_0009 S2.C13	<p>Non-compliant</p> <p>Medium Risk</p>	<p>Finding accepted</p> <p>Refer to comments under DA 08_0009 S2.C13</p> <p><b>July 2018 Action Status: Complete.</b></p>
EPL 1625, O4.2	The ponds must be maintained to ensure that sedimentation does not reduce their capacity by more than 20% of the design capacity.	<p>A Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 was available for review. A Pond Capacity spread sheet was available that showed sediment volumes for the Settlement lagoon, Southern Pond, Northern Pond, TS1 Pond, Tower 3 Pond, Workshop Pond and Central Pond and the percentage design capacity based on inputted data. The ponds were last surveyed in June 2016 with the exception of the Central Pond which was surveyed in October 2016.</p> <p>It was not clear how the Pond Capacity Tables spread sheet related to the Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 given no reference was made of the spread sheet in the procedure.</p> <p>The following is noted:</p> <ul style="list-style-type: none"> <li>On 22 April 2015 it was reported that the sediment level in the Central Pond (LDP 23) was at approximately 30%. Site management reported that repeated wet weather events prevented cleanout operations. Site management reported that sediment levels were cleaned out to less than 5% on 28 May 2015 when weather permitted. The non-compliance was reported in the Annual Return for the 2015 / 2016</li> </ul>	<p>Non-compliant</p> <p>Medium Risk</p>	<p>Finding accepted</p> <p>During the reporting period, PKCT implemented a Pond Sediment Level monitoring process and associated Procedure. Due to the temporal nature of the sediment levels within the Ponds across the site, the process will take a number of years to fully “calibrate” and understand the rates of infill for each pond. PKCT will continue to utilise its Pond Sediment Level Monitoring Procedure to manage</p>

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		<p>period. The Central Pond Upgrade project was completed in February 2016.</p> <ul style="list-style-type: none"> <li>A dredging program was undertaken in August 2015 and September 2015 in the Settlement Lagoon. The program utilised a suction cutter dredge feeding a wet-slurry into a network of geotextile bags. The bags allowed water to escape while trapping and storing sediment for later removal. Ongoing monitoring is required; however, Site management reported an improvement in water clarity as well as a reduction in the TSS levels of discharge water since dredging was completed. Site management also reported that use of the geotextile bags allows scheduled cleaning of the Settlement Lagoon regardless of the weather conditions.</li> <li>The northern pond was surveyed on the 1 June 2015 and found sediment to be at 21% of design capacity. The pond was desilted and then re-surveyed on the 10 June 2016 which confirmed sediment volume at 1% of design capacity.</li> </ul> <p>Given the reported Annual Return non-compliance for the period 2015 / 2016 this condition was found to be non-compliant.</p>	<p><b>REC-2017-05</b> – Update the Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet.</p>	<p>sediment levels in the ponds and ensure compliance with Condition 04.2 of EPL1625</p> <p><b>REC-2017-05</b> – PKCT will Update the Pond Sediment Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Document was updated within SharePoint to include links and reference to Pond Capacity Spreadsheet.</p>
EPL 1625, M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was</p>	<p>The EPL Water Quality Data spreadsheet included the date, time and initials of the person who collected the sample for each of the monitoring points.</p> <p>Depositional dust sampling was being undertaken by SGS. SGS complete an Environmental Dust Sheet which includes the</p>	<p>Compliant</p> <p><b>OFI-2017-11</b> - Ensure the contractor undertaking the depositional dust monitoring includes a</p>	<p>Finding accepted</p> <p><b>OFI-2017-11</b> – PKCT will liaise with our contractor undertaking the depositional dust</p>

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Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
	taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	location of each dust gauge, the date it was collected and the initials of the person who collected it. The time at which the sample was collected was not recorded. This is not considered to be critical for depositional dust monitoring as the Australian Standard requires that sampling is conducted every 30 days +/- 2 days, however for completeness it should be included on the dust sheet.	record of the time the depositional dust gauges were collected.	monitoring to ensure they include a record of the time the depositional dust gauges were collected.  Action by: PKCT Environmental Specialist  Completion Date: 31/07/2017  <b>July 2018 Action Status: Complete.</b>  Phone call with follow up email sent to dust collection contractor on 30/06/2017. Discussion identified that COC's include time of sample collection. These are provided to PKCT upon receipt of the samples. Example of COC and email provided in attachment.
EPL 1625, M2.1 and M2.2	<b>Monitoring Concentration of Pollutants Discharged and Air Monitoring Requirements</b>  For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by	Particulates – deposited matter was using dust deposition gauges at the specified locations (Pointe 1-9, 12, 15, 17, 18, 19). TSP, PM <sub>10</sub> and PM <sub>2.5</sub> monitoring was conducted using OSIRIS instruments located north and south of the coal terminal (Points 20 and 21).	Non-compliant  Low risk	Finding accepted.  PKCT has reported the non-compliances associated with this finding to the EPA

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	<p>sampling and obtaining results by analysis) the concentration of each pollutant specified below. The licensee must use the sampling method, units of measure, and sample at the frequency specified.</p> <p><b>Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Particulates – Deposited Matter</td> <td>Grams per square metre per month</td> <td>Monthly</td> <td>AM-19</td> </tr> </tbody> </table> <p><b>Point 20, 21</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td rowspan="2">Micrograms per cubic metre</td> <td rowspan="2">Continuous</td> <td rowspan="2">Continuously</td> </tr> <tr> <td>PM2.5</td> </tr> <tr> <td>Total Solid Particles</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Pollutant	Unit of Measure	Frequency	Sampling Method	Particulates – Deposited Matter	Grams per square metre per month	Monthly	AM-19	Pollutant	Unit of Measure	Frequency	Sampling Method	PM10	Micrograms per cubic metre	Continuous	Continuously	PM2.5	Total Solid Particles				<p>There were a number of periods in the 2015/2016 annual return period where non-compliances were noted in the DDG network and in the real-time monitoring network. Reasons provided for the non-compliances were:</p> <ul style="list-style-type: none"> <li>Bottle breakages due to glass fatigue, vandalism or bottles broken in transit to the laboratory. Procedures have been modified to deal with the breakages. Broken bottles still appear to be a problem after this point with broken bottle attributed to cracks in old bottles reported in May and August 2016.</li> <li>Access restrictions due to Point 9 (Sydney Water RWTP). Access requirements changed during the licence period resulting in 3 samples not being collected between August and December 2015. Procedures have been clarified between PKCT contractors and appropriate inductions provided to staff entering the SW site rectifying problem.</li> <li>Minor maintenance issues related to ongoing operation of the OSIRIS monitor reduced the data capture over the licence period. Overall the data capture was still at a high level and although a technical non-compliance, the reaction to the outages appears reasonable.</li> </ul> <p>Due to the non-compliances with this requirement reported in the Annual Returns, this condition has been assessed as non-compliant.</p>		<p>through the Annual Return Reporting process. Actions have been implemented to minimise the likelihood of further non-compliances.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> <p><b>July 2018 Action Status: Complete.</b></p>
Pollutant	Unit of Measure	Frequency	Sampling Method																						
Particulates – Deposited Matter	Grams per square metre per month	Monthly	AM-19																						
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EPL 1625, M2.3	<p>Water and/ or Land Monitoring Requirements</p> <p><b>Point 16</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Pollutant	Unit of Measure	Frequency	Sampling Method					<p>The EPL Water Quality Data spreadsheet included monitoring results for Oil and Grease, pH and TSS at LDP16, LDP22, LDP23, LDP25, LDP26. This monitoring included routine monitoring (not required by the EPL) in addition to monitoring during discharges.</p> <p>Results for LDP24 were not included in the spreadsheet. A review of the 2014-15 Annual Return indicated no monitoring was required as there were no discharges from this pond (Tower 3</p>	<p>Compliant</p> <p><b>OFI-2017-12</b> – Review the requirements of the POEO Act for publishing monitoring data</p>	<p>Finding accepted</p> <p><b>OFI-2017-12</b> – PKCT has reviewed the requirements of the POEO Act for publishing monitoring data and will include overflow</p>													
Pollutant	Unit of Measure	Frequency	Sampling Method																						

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	Oil & Grease	Visible	Daily During Any Discharge	Visual Inspection	Pond). A review of the 2015-16 Annual Return provided results for one monitoring event.  PKCT reported in its 2014-15 Annual Return that there was one instance (13.02.15) where a sample was misplaced and as a result there was insufficient water to undertake a TSS analysis.  Section 66(6) of the POEO Act requires holders of an EPL to make any pollution monitoring data obtained in compliance with any monitoring conditions attached to their EPL publicly available. The EPL 1625 Monthly Environment Report available on PKCT’s website includes results of monitoring at LDP16 but not of the other wet weather discharge points.		monitoring results for all wet weather discharge points in its monthly web publications.  Action by: PKCT Environmental Specialist  Completion Date: 31/07/2017  <b>July 2018 Action Status: Complete.</b>  PKCT reviewed the requirements of the POEO Act for publishing monitoring data and now includes overflow monitoring results for all wet weather discharge points in its monthly web publications.		
	pH	pH		Grab Sample					
	TSS	Milligrams per litre							
<b>Point 22,23,24,25,26</b>									
	Oil & Grease	Visible	Daily During Discharge	Visual Inspection					
	pH	pH		Grab Sample					
	TSS	Milligrams per litre							
EPL 1625, M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a				As described above community complaints were recorded as Events within EMS. A review of the ‘Event Reports’ for the complaints received during the audit period indicated: <ul style="list-style-type: none"> <li>The method of the complaint is not a mandatory field within the EMS but was observed to be included in the ‘Brief Description’ for the examples sighted.</li> <li>The personal details of the complainant are not mandatory fields within the EMS but the name and address was observed to be included in the ‘Brief Description’ for the examples sighted. The complainant’s phone number was</li> </ul>	Compliant <b>OFI-2017-13</b> - Consider adding the following fields to the ‘Event Report’ to ensure they are always captured: <ul style="list-style-type: none"> <li>method by which complaint was made;</li> </ul>	Finding accepted <b>OFI-2017-13</b> - PKCT will work with its IT consultant to investigate whether the following fields can be added to the EMS “Event Report” interface; <ul style="list-style-type: none"> <li>method by which</li> </ul>		

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	<p>note to that effect;</p> <p>d) the nature of the complaint;</p> <p>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the licensee, the reasons why no action was taken.</p>	<p>not recorded in the 'Event Report'. Personal details including name and phone number are collected by the call centre and provided to PKCT for follow up.</p> <p>The Event Reports sighted were noted to include a description of the nature of the complaint and action taken by PKCT including follow up action with the complainant.</p>	<ul style="list-style-type: none"> <li>complainant personal details</li> </ul>	<p>complaint was made;</p> <ul style="list-style-type: none"> <li>complainant personal details</li> </ul> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: If feasible, PKCT will incorporate the changes by 31/12/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>System has been updated.</p>
EPL 1625, M7.1	<p><b>OTHER MONITORING AND RECORDING CONDITIONS</b></p> <p><b>Noise Monitoring</b></p> <p>Noise from the premises must be measured bi-annually (to measure summer and winter levels) via a combination of attended and un-attended noise monitoring measures at the potentially affected premises identified in the Limit Conditions section of this licence.</p>	<p>Bi-annual attended and unattended noise monitoring was undertaken at identified residences during the audit period until April 2016.</p> <p>As required by M7.2 below, a review of noise monitoring was undertaken by PKCT and as noise levels were below the Noise Impact Criteria in all noise surveys undertaken since 2009, PKCT sought permission to remove the requirement for bi-annual monitoring from the EPA and DP&amp;E (by letters dated 30.08.16). This request was accepted by the DP&amp;E by letter dated 16.03.17 however it was reported that the EPA did not formally respond to the request.</p> <p>As formal EPA approval to remove the requirement for monitoring could not be demonstrated, this condition could not</p>	<p>Not verified</p> <p><b>REC-2017-08</b> Seek a variation to the EPL to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.</p>	<p>Finding accepted</p> <p><b>REC-2017-08</b> - PKCT has initiated discussions with the EPA in regards to this finding. PKCT will formally request a variation to EPL 1625 to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date:</p>

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		be verified.		<p>Formal request to EPA to be made by 31/08/2017.</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PKCT has received formal correspondence from the EPA that is accepting of the removal of the requirement for routine noise monitoring.</p>
EPL 1625, R2.1	<p><b>Notification of Environmental Harm</b></p> <p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	<p>The following notifications were made to the Environment Line during the audit period:</p> <ul style="list-style-type: none"> <li>18 March 2015: washdown water containing coal fines was discharged into Port Kembla harbour during routine cleaning of Shiploader 1 over Coal Berth 102.</li> <li>28 July 2015: washdown water containing coal fines was discharged into Port Kembla harbour during a routine washdown of Shiploader 2 over Coal Berth 102.</li> <li>28 August 2015: washdown water containing coal fines was discharged into Port Kembla harbour during loading of the 'C' Atlas which was berthed at the premises.</li> </ul> <p>In addition the following were reported to PKCT's local EPA officer:</p> <ul style="list-style-type: none"> <li>Turbid water discharges on the 25-27th March and 4th and 6th April 2014 following a storm event. Verbally communicated to EPA on the 9 April 2014 and by email</li> </ul>	<p>Non-compliant</p> <p>Low risk</p> <p><b>REC-2017-06</b> – Revise the Incident Reporting and Investigation Procedure PR.HS.124 to include further guidance on determining material harm to the environment (as per Section 147 of the POEO Act).</p>	<p>Finding accepted</p> <p><b>REC-2017-06</b> - PKCT will Revise the Incident Reporting and Investigation Procedure PR.HS.124 to include further guidance on determining material harm to the environment (as per Section 147 of the POEO Act).</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date:</p>

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		<p>dated 10.04.14. The EPA requested PKCT submit an incident report under R3.1 (refer R3.1). Following investigation, PKCT were issued with a Formal Warning dated 21.07.14.</p> <ul style="list-style-type: none"> <li>An incident on the 5 June 2014 where a pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm event was not considered material and was not immediately reported to the Environment Line but reported to the EPA via email on the 6.06.14. Following investigation (refer R3.1 below), the EPA issued PKCT with an Official Caution for the incident dated 10.09.14. The Official Caution also noted that PKCT may have breached Section 152 of the Protection of the Environment Operations (POEO) Act 1997 which relates to the duty to immediately notify pollution incidents. In response PKCT has revised its incident report within EMS to include a category under 'Notification Type' for events which are 'Not Material- EPA notification may be required, contact manager'.</li> </ul> <p>On the basis of the stormwater discharge events in March/April 2014 and the incident on the 5 June 2014 not being notified immediately to the EPA via the Environment Line, this condition has been assessed as non-compliant. However given improvements to reporting since this time it has been assessed as low risk.</p>		<p>30/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PR.HS.124 was updated with further guidance on determining material harm to the environment.</p>
EPL 1625, R4.2	<p><b>Wet Weather Overflow Reporting</b></p> <p>The following must be submitted to the EPA with the Annual Return:</p> <p>Details of any overflow from Point 22, Point 23, Point 24, Point 25 and/or Point 26 specified by Conditions P1.2 and P1.3.</p> <p>The following information must be provided</p>	<p>A Wet Weather Overflow Report was included with the Annual Return for the period 2014 / 2015 for LDP 26. Overflow events were reported on the following days:</p> <ul style="list-style-type: none"> <li>24 March 2015 from LDP 23 and LDP 26. The discharge from the Central Pond (LDP23) was considered to not be permitted by the EPL as sediment levels were above 20% (refer to Condition O4.2).</li> </ul>	<p>Compliant</p> <p><b>OFI-2017-14</b> – The EPL Water Quality Data spread sheet should include a column that indicates whether samples were taken during an overflow event</p>	<p>Finding accepted</p> <p><b>OFI-2017-14</b> – PKCT has updated the EPL Water Quality Data spread sheet to include a column that indicates whether samples were taken during an</p>

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	<p>for each overflow:</p> <ul style="list-style-type: none"> <li>a tabular presentation of the concentration of each pollutant specified in Condition M2.3;</li> <li>date and time of the commencement of each overflow;</li> <li>an estimate of the volume of each stormwater overflow and over what time period the overflow occurred;</li> <li>the weather conditions at the time of each overflow, specifying the amount of rainfall on a daily basis that had fallen a) on the day(s) of the overflow and b) for each day of the 7 day period prior to the overflow;</li> <li>an explanation as to why the overflow occurred;</li> <li>an estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1;</li> <li>the location(s) of the discharge; and</li> <li>was the discharge permitted by the licence.</li> </ul>	<p>A Wet Weather Overflow Report was included with the Annual Return for the period 2015 / 2016 for LDP 22, LDP 23, LDP 24 and LDP 25. Overflow events were reported on the following days:</p> <ul style="list-style-type: none"> <li>20 April 2015 to 22 April 2015 from LDP 23 and LDP 25.</li> <li>25 August 2015 from LDP 22, LDP 23, LDP 24 and LDP 25.</li> </ul> <p>The report(s) included:</p> <ul style="list-style-type: none"> <li>A tabular presentation of the concentration of each pollutant specified in Condition M2.3.</li> <li>Date and time of the commencement of each overflow.</li> <li>An estimate of the volume of each stormwater overflow and the time period the overflow occurred.</li> <li>The weather conditions at the time of each overflow, that specified the amount of rainfall on a daily basis that had fallen a) on the day(s) of the overflow and b) for each day of the seven day period prior to the overflow.</li> <li>An explanation as to why the overflow occurred.</li> <li>An estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1.</li> <li>The location(s) of the discharge.</li> <li>Whether the discharge was permitted by the licence.</li> </ul> <p>The EPL Water Quality Data spreadsheet included monitoring data for LDP 16, LDP 22, LDP 23, LDP 25 and LDP 26 and included data including, but not limited to, TSS, Oil &amp; Grease and pH. For the satellite ponds (LDP 22, LDP 23 and LDP 25) it was not possible to determine if samples were taken during an overflow event or as part of a routine sampling program.</p>	<p>or were part of the routine monitoring program.</p>	<p>overflow event or were part of the routine monitoring program.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion date: Action Complete.</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Spreadsheet has been updated.</p>

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Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
PKCT Drivers Code of Conduct 006	Limit speed to 50km/hr on Bellambi Lane.	<p>Wollongong Coal heavy haulage induction and Bohud DCC detail requirements for Bellambi Lane including speed. Wollongong Coal uses an RFI system to track vehicle movements to/ from their colliery including the use of Bellambi Road. The system monitors speeds compliance and travel times. Information on truck speeds and travel times on route and specifically within Bellambi Lane are checked daily by Bohud Management, and alarms are triggered automatically if a breach occurs.</p> <p>An extract of the vehicle tracking system for the period between 05/05/2016 and 26/05/2016 was sighted by the audit team. It showed that average speeds for trucks during this time periods were recorded at 50km/h or lower.</p> <p>PKCT undertakes Task Observations to assist in monitoring compliance with the DCC. The PKCT Task Coach &amp; Observation Sheet: Drivers Code of Conduct (F.HS.169) was noted to include a check that trucks adhere</p>	<p>Compliant</p> <p><b>OFI-2017-15</b> - Consider revising the format of the DCC Monthly Report to require transport companies to report on some of the specific requirements of the DCC, such as:</p> <ul style="list-style-type: none"> <li>- speed limits on Bellambi Lane,</li> <li>- no compression braking approaching the intersection of Port Kembla Road and Springhill Road and on Masters Road</li> <li>- ensuring tailgates are locked before leaving PKCT</li> <li>- using designated routes to and from site;</li> <li>- limiting noise where possible on Bellambi Lane.</li> </ul> <p><b>OFI-2017-16</b> - Ensure trucking companies are thoroughly completing the DCC Monthly Reports. Where the companies are ticking that they are completing internal audits of the Key Operational Focus Areas, this could be improved by including the date</p>	<p>Findings accepted</p> <p><b>OFI-2017-15</b> – PKCT will review the format of the DCC Monthly Report to request more specific information from the transport companies where applicable.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: DCC Monthly Report updated and distributed to transport companies by 31/09/2017.</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Report has been updated and distributed to relevant truck companies.</p> <p><b>OFI-2017-16</b> – PKCT will review the DCC Monthly Report format to incorporate dates that audits were undertaken by the trucking companies.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/09/2017.</p>

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		<p>to speed limits and details the 50 km/h speed limit on Bellambi Lane. A screenshot of the Task Observations logged in PKCT's SharePoint system indicated that Task Observations were being undertaken regularly (typically monthly). It is noted that not all items on the Task Observation Sheet are completed each month as observations may focus on specific issues. Some examples sighted (e.g. 26.12.15 and 6.05.16) included a check that the speed limit on Bellambi Lane was being adhered to.</p> <p>The DCC Monthly Report completed by the road transport companies and provided to PKCT, includes a 'Checklist of Key Operational Focus Areas which has under the focus area of 'Audits and Enforcement' a check of speed of trucks. This is not always completed by the transport companies. Some companies tick that they are undertaking audits.</p> <p>An opportunity for improvement exists to include more specific DCC requirements within the DCC Monthly Report and ensuring that the transport companies are</p>	<p>that the audits were undertaken.</p>	<p><b>July 2018 Action Status: Complete.</b></p> <p>Report has been updated and distributed to relevant truck companies.</p>

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		completing the reports adequately.		
PKCT Drivers Code of Conduct 009	Utilise the truck wash at PKCT after tipping.	<p>The design of the truck unloading facility requires all trucks delivering to the site to travel through the truck wash. Site observations of the truck wash indicated all trucks pass through the truck wash, with drivers adequately cleaning the T-bar. Supplemental hoses are provided for drivers to wash down trucks manually. Site observations indicated that trucks were sufficiently clean on exit from the truck wash. Task Coach and Observation Sheet sighted (CTO-01532 20/06/2016) showed a minor spillage incident on an internal road. This was appropriately dealt with by PKCT.</p> <p>Monitoring of effectiveness of truck wash was done through driver self-reporting, and monthly DCC reports. No continuous monitoring of the cleanliness of trucks leaving the facility was being undertaken.</p> <p>A second supplemental truck wash</p>	<p>Compliant</p> <p><b>OFI-2017-17</b> - Consider introducing a process for monitoring trucks exiting the truck wash to ensure the effectiveness of the facility.</p>	<p>Finding accepted</p> <p><b>OFI-2017-17</b> – PKCT will review the existing monitoring systems and auditing schedules to assess whether practical improvements can be made to the current monitoring process.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/12/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Truckwash system has been updated to include an online turbidity probe. The probe will assist with monitoring effectiveness of truckwash facility.</p>

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		<p>was provided on the southern end of the PKCT for deliveries not using the main unloading facility. The audit team was informed that this wash was also used during maintenance of the main wash facility. It is however noted that no management procedures outline what would be put into place when this is required.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to unwashed trucks leaving the site.</p>		
PKCT Drivers Code of Conduct 011	Operate the vehicle in a manner that minimises vehicle noise.	<p>Wollongong Coal heavy haulage induction and Bohud DCC and identify this issue as a focus area and is specific that drivers be stringent about limiting noise and specific noise to avoid, due to residents. Bohud drivers are tested on the DCC via a checklist appended to the PKCT DCC.</p> <p>Noise Minimisation Controls are included in the DCC Monthly Report, however, is not specifically included in the Internal Audit Worksheets used in the annual audits of the transport companies.</p> <p>One enquiry about truck noise on Port Kembla Road was received by</p>	<p>Compliant</p> <p><b>OFI- 2017-18</b> - Include a check of operating vehicles to minimise noise within the Internal Audit Worksheets.</p>	<p>Finding accepted</p> <p><b>OFI- 2017-18</b> – PKCT will update the Internal Audit Worksheet to include a check of operating vehicles to minimise noise. The Worksheet will be updated prior to the next annual audit.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: Audit Worksheet updated by 31/08/2017.</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>DCC ETO Sheet was updated to include specific comment re. minimising noise for each of the On</p>

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		<p>PKCT on 1 April 2016. The enquiry and subsequent follow-up, and investigation by PKCT was sighted by the audit team. A noise assessment on Swan Street was carried out by Wilkinson Murray Pty Ltd as a result of the enquiry. PKCT requested the transport companies re-communicate the requirements and undertake driver monitoring to ensure compression braking at the Springhill Rd/ Port Kembla Rd intersection is not occurring. It is assessed that the enquiry was appropriately responded to by PKCT. It is noted that the enquiry was not a noise complaint by the resident, however an observation. Refer also to DA 08_0009, S3.C3.</p> <p>No complaints or other incidents have been recorded by PKCT during the audit period relating to truck noise.</p>		<p>road, at PKCT and At Mine site observation sheets. Sheet was updated and reloaded to SharePoint at Version 8 on 14/08/2017</p>
<p>PKCT Drivers Code of Conduct 016</p>	<p>All haulage trucks travelling to and from PKCT will do so by using major arterial roads as outlined in the PKCT Driver's Code of Conduct.</p>	<p>The PKCT Task Coach and Observation Sheet includes a specific statement and assessment criteria in relation to this condition. Task Coach and Observation Sheet sighted (CT)-01501 05/05/2016, CTO-01479 26/04/2016) shows compliance with major arterial</p>	<p>Non-compliant Low risk Refer to <b>OFI-2017-15</b></p>	<p>Finding accepted</p> <p>Refer to <b>OFI-2017-15</b> for actions.</p> <p><b>July 2018 Action Status: Complete.</b></p>

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Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		<p>roads.</p> <p>The use of the major arterial roads by haulage trucks is not specifically outlined in the DCC Monthly Report and Internal Audit Worksheet. An example of the Bulktrans observation sheet (Southern Bulk Haulage: Behavioural Observations) was sighted and noted to include a check that trucks are travelling on the correct routes outlined in driver inductions.</p> <p>One complaint was received by PKCT in December 2014 (EV-0506) in relation to haulage trucks deviating from the major arterial roads. It was reported that trucks were observed to be parking near the takeaway premises at the intersection of Princes Highway and Mt Ousley Road. The enquiry and subsequent follow-up, and investigation by PKCT was sighted by the audit team. It was found that Bulktrans had not informed their drivers to drive only on their route to and from the Mine site and Port. Bulktrans committed to directing their workforce to use only major arterial roads. On the basis of this incident, this requirement has been assessed as</p>		

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Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		non-compliant.  No other complaints or incidents have been recorded by PKCT during the audit period relating to trucks using the designated routes.		

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Condition	Requirement	Verification/Comment	Compliance Status & Recommendation	PKCT Response/Action
SoC 2	<p><b>Community Relations</b></p> <p>Continued operation of the PKCT Community Consultative Committee.</p>	<p>The PKCT website has been updated since the previous IEA to include a link to the CCC Terms of Reference. However it does not include any other details such as upcoming meetings, minutes from previous meetings.</p>	<p>Compliant</p> <p><b>OFI-2017-19</b> - Include CCC meeting minutes on the PKCT website</p>	<p>Finding accepted</p> <p><b>OFI-2017-19</b> – PKCT will include CCC meeting minutes on the PKCT website.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/07/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PKCT updated layout of website and CCC meeting minutes for 2017 were added to the webpage. Action completed on 27/07/2017.</p>

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#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation	PKCT Response/Action
10	O4.1	<p><i>It is recommended that PKCT:</i></p> <p><i>Complete, finalise and implement Settlement Lagoon Cleanout Process document. Document/record implementation of document implementation (e.g. staff training and maintenance schedules).</i></p>	<p>A dredging program was undertaken in August 2015 and September 2015 in the Settlement Lagoon. The program utilised a suction cutter dredge feeding a wet-slurry into a network of geotextile bags. At the time of the audit, the procedure was yet to be updated.</p>	<p>Ongoing</p> <p><b>OFI-2017-20</b> – Update the Settlement Lagoon Cleanout Process document</p>	<p>Finding Accepted</p> <p><b>OFI-2017-20</b> - PKCT will update the Settlement Lagoon Cleanout Process document.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/08/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PKCT Settlement Lagoon Cleaning Procedure re-written and adjoining document "Controlled discharge from Settlement Lagoon Procedure also written. Both documents were uploaded to SharePoint.</p>
13 & 14	O3.1 O3.2	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> <li>- <i>Conduct an internal review of compliance to conditions O3.1 and O3.2 relating to dust emissions beyond the boundary of the site.</i></li> </ul> <p><i>Review the train receipt system to</i></p>	<p>PKCT reported that it undertook an internal review involving the sampling of residential dust samples and testing to categorise dust sources. The results indicated that coal dust was typically 9-20% of the overall sample.</p>	<p>Ongoing</p>	<p>Finding Accepted</p> <p>PKCT submitted EIP U2 "Use of Real Time Particulate Monitoring Data for Operational Control" to the EPA by the due date of 28<sup>th</sup></p>

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#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation	PKCT Response/Action
		<i>ensure all reasonable and feasible measures are employed to prevent or minimise dust impacts beyond the rail loop.</i>	<p>PKCT has an Environmental Improvement Program (EIP) in its EPL (U1.1) to undertake a particulate matter control best practice study. The reporting associated with this EIP is due in June and September 2017.</p> <p>PKCT also has an EIP in its EPL for the use of real time particulate monitoring data for operational control. The reporting associated with this EIP is due in April 2017.</p>		<p>April 2017. PKCT has received email correspondence from the EPA that it has accepted the review and associated actions and will remove the EIP from PKCT EPL.</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>The EIP U1 "Particulate Matter Control Best Practice Study" is complete and has been submitted to the EPA. The study is publically available on PKCT's website.</p>

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Site observation	OFI-2017-02	Consider more permanent labelling of the pipes for easy identification.	<p><b>OFI-2017-14</b> – PKCT will install permanent labels on the inflow pipes to improve identification of the inflow routes to the Settlement Lagoon.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/10/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Labels have been added to the inflow pipes.</p>
Noise Management Plan	REC-2017-09	<p>Revise the NMP with the following improvements:</p> <ul style="list-style-type: none"> <li>- Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken.</li> <li>- Consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of maximum noise levels) in any future noise compliance surveys.</li> </ul>	<p><b>REC-2017-09</b> – Refer to DA 08_0009, S3.C2, for PKCT response/actions.</p> <p><b>July 2018 Action Status: Complete.</b></p>
Drivers Code of Conduct	REC-2017-10	Review the DCC to reflect the current road environmental conditions and better present concepts and requirements contained within. The revised DCC should be submitted to the DP&E for permission to supersede the existing DCC.	<p><b>REC-2017-10</b> – PKCT will review the DCC to reflect the current road environmental conditions and better present concepts and requirements contained within. The revised DCC will be submitted to the DP&amp;E for permission to supersede the existing DCC.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Management Plan was updated and submitted via email to DP&amp;E on 12/09/2017.</p>
Drivers Code of Conduct	OFI-2017-03	Investigate ways to inform drivers of the requirements in the DCC and monitor compliance through the use of technology.	<p><b>OFI-2017-03</b> – As part of the DCC review, PKCT will look for ways where practical to do so, to increase the use of technology to monitor DCC compliance. Feasible system and process upgrades will be undertaken across the coming audit period.</p> <p>Action by: PKCT Environmental Specialist</p>

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			Completion Date: Any identified improvements will be implemented by the next IEA in April 2020.
Management Plans (general)	REC-2017-11	A document revision section should be included on all management plans so that the period between reviews as well as which section/area of the plan has been revised can be identified.	<p><b>REC-2017-11</b> – Document revision is currently tracked through PKCT’s SharePoint document management system, however to improve visibility, PKCT will incorporate a document revision section on all management plans.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/09/2017</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>Management Plans were updated and submitted via email to DP&amp;E on 12/09/2017. All submitted plans now have a document revision table incorporated.</p>
Environmental Management Strategy	REC-2017-12	<p>Revise the Environmental Management Strategy with the following improvements:</p> <ul style="list-style-type: none"> <li>- Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation.</li> <li>- Update Table 9-1 to reflect changes to noise monitoring and to include requirements relating to monitoring of sediment levels in ponds and train wagon condition monitoring</li> <li>- Update Table 9-2 to reflect recent changes to reporting requirements e.g. remove requirements to report against Energy and Water Savings Plans, and to provide Interim Environmental Management Reports (no longer required), include requirements for Ambient Air Monitoring Report, Wet Weather Overflow Reporting and Train Condition Exception Reporting required by the EPL.</li> </ul>	<p><b>REC-2017-12</b> - Refer to DA 08_0009, S4.C1, for PKCT response/actions</p> <p><b>July 2018 Action Status: Complete.</b></p>
Water Management Plan	REC-2017-13	Review the WMP to reflect recent upgrades to water management on site, in particular the Central Pond Upgrade	<b>REC-2017-13</b> - Refer to DA 08_0009, S3.C13, for PKCT response

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		Project. This review should include a review and revision (where necessary) of the site water balance and be submitted to the Director-General for approval.	/actions. <b>July 2018 Action Status: Complete.</b>
Water Management Plan	REC-2017-14	Update the WMP with the following improvements: <ul style="list-style-type: none"> <li>- Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements.</li> <li>- Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625.</li> <li>- Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16.</li> </ul>	<b>REC-2017-14</b> – Refer to DA 08_0009, S3.C13, for PKCT response/actions. <b>July 2018 Action Status: Complete.</b>
Greenhouse Gas and Energy Efficiency Management Plan	REC-2017-15	Revise the GHG&EE Management Plan to reflect that the Energy Savings Action Plan Program has ended and identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions and energy use.	<b>REC-2017-15</b> - Refer to DA 08_0009, S3.C18, for PKCT response/actions. <b>July 2018 Action Status: Complete.</b>
Greenhouse Gas and Energy Efficiency Management Plan	REC-2017-16	Revise the GHG&EE Management Plan with the following improvements: <ul style="list-style-type: none"> <li>- Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered.</li> <li>- Update the GHG&amp;EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used.</li> <li>- Include further details within the GHG&amp;EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured.</li> </ul>	<b>REC-2017-16</b> - Refer to DA 08_0009, S3.C18, for PKCT response/actions <b>July 2018 Action Status: Complete.</b>
Pollution Incident Response Management Plan	REC-2017-17	At the next revision of the PIRMP update the document so that referenced Figures correlate with those presented in the plan.	<b>REC-2017-17</b> – PKCT will update the PIRMP to ensure that referenced Figures correlate with those presented in the plan.

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			<p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/12/2016</p> <p><b>July 2018 Action Status: Complete.</b></p> <p>PIRMP was re-written and updated on 18/01/2018. All links and figures within the document now correlate.</p>
2014 IEA OFI carried forward	OFI-2017-20	Update the Settlement Lagoon Cleanout Process document	<p>Refer to Table 14, Item No. 10, Condition No. O4.1 for PKCT response/actions.</p> <p><b>July 2018 Action Status: Complete.</b></p>

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11.7 Appendix G: ISO 14001 and 9001 Certificate



# Certificate of Approval

This is to certify that the Management System of:

## Port Kembla Coal Terminal Limited

Port Kembla Road, (off Springhill Road), Wollongong, 2520, Australia

has been approved by LRQA to the following standards:

ISO 14001:2015 | ISO 9001:2015

Basem Obaid - Global Head of Training and Improvement Services

Issued by: Lloyd's Register Quality Assurance Limited

Current issue date: 4 February 2019  
Expiry date: 28 February 2022  
Certificate identity number: 10170166

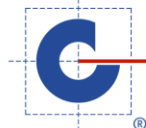
Original approval(s):  
ISO 14001 – 2 February 1994  
ISO 9001 – 2 February 1994

Approval number(s): ISO 14001 – 0048094 / ISO 9001 – 0048095

The scope of this approval is applicable to:

Receiving, stockpiling and loading of coal, coke and other dry bulk materials for shipment.

JAS-ANZ



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