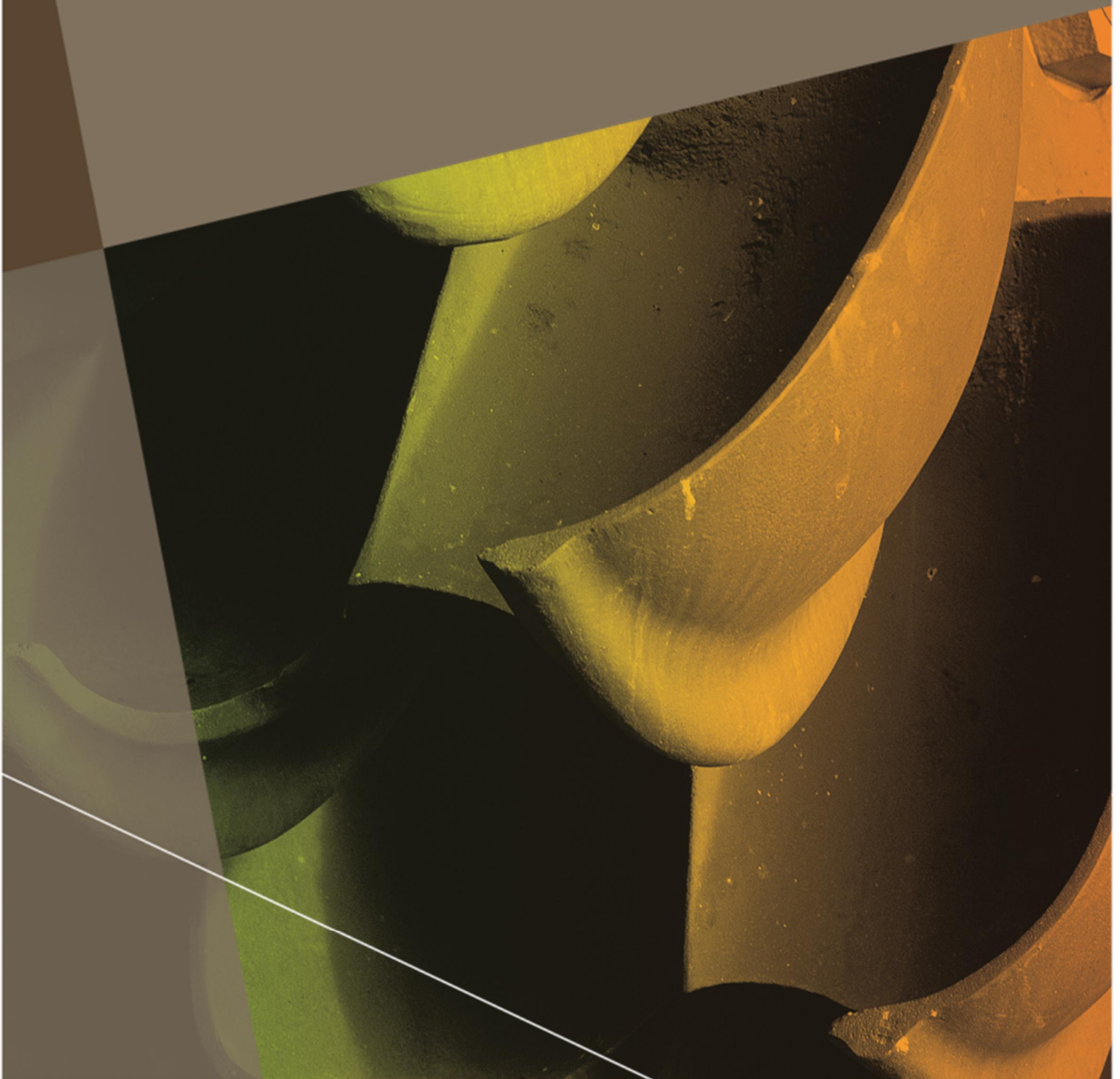


2017 Independent Environmental Audit

Port Kembla Coal Terminal



2017 Independent Environmental Audit

Client: Port Kembla Coal Terminal Pty Ltd

ABN: 72 003 942 774

Prepared by

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Prepared by Helen Onus

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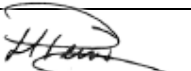
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Abbreviations

Abbreviation	Description
AECOM	AECOM Australia Pty Ltd
CCC	Community Consultative Committee
CoA	Conditions of Approval
DA	Development Approval
DCC	Drivers Code of Conduct
DECC	Former NSW Department of Department of Environment and Climate Change now EPA
DECCW	Former NSW Department of Environment, Climate Change and Water now EPA
Director-General	Director-General of Department of Planning and Environment or delegate
DP&E	Department of Planning and Environment
DP	Deposited Plan
EA	Environmental Assessment
EIP	Environmental Improvement Program
EMS	Event Management System
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GGBFMP	Green and Golden Bell Frog Management Plan
kL/yr	Kilolitres per year
LDP	Licensed Discharge Point
LMP	Landscape Management Plan
L	Litres
mtpa	million tonnes per annum
NCIG	Newcastle Coal Infrastructure Group
NMP	Noise Management Plan and Monitoring Program
OEH	Office of Environment and Heritage
OFI	Opportunity for Improvement
PIRMP	Pollution Incident Response Management Plan
PKCT	Port Kembla Coal Terminal Ltd
the Project	The development as described in the EA
PRP	Pollution Reduction Plan(S)
SoC	Statement of Commitments
the Consortium	Six, equal shareholders who are all coal producers on the Southern and Western coal fields of NSW that operate the Site.
T	Tonne(s)
TSS	Total Suspended Solids

Executive Summary

AECOM Australia Pty Ltd (AECOM) was engaged by Port Kembla Coal Terminal (PKCT) to carry out an Independent Environmental Audit (IEA) of the Port Kembla Coal Terminal located at Port Kembla Inner Harbour, New South Wales (the Site).

Condition No.5, Schedule 4 of the Port Kembla Coal Terminal Project Approval 08_0009 (PA 08_0009), dated 12 June 2012 requires PKCT to commission an IEA by 31 March 2011, and every 3 years thereafter. To meet this requirement, AECOM was commissioned prior to the end of March 2017 to carry out an independent audit of the PKCT Project Approval. The Site inspection was undertaken on 7 and 10 April 2017.

The audit was completed in accordance with the Condition 5, Schedule 4 of DA 08_0009 and AECOM proposal (OPP-600759), dated 27 January 2017.

The audit methodology comprised the following activities:

- Initial discussions with PKCT management to organise the audit, including the provision of documentation, the Site visit and timing.
- Discussions with NSW Department of Planning and Environment (DP&E) to discuss any concerns and areas for particular focus during the audit.
- Preparation of Site compliance checklists and review of documentation provided by PKCT.
- Consultation with key government agencies and other relevant agencies as presented in this Report.
- A two day Site inspection and interviews with key site personnel on Friday 7 April 2017 for the Lead Auditor and Traffic specialist and on Monday 10 April 2017 for the rest of the audit team.
- Review of additional documentation provided by PKCT after the Site inspection.
- Submission of a Draft Report to PKCT outlining the audit findings.
- Finalisation of the Report based on comments from PKCT.

This is the third IEA to be carried out at the Site under DA 08_0009 and for the purpose of this audit, the audit period has generally been defined as from 28 March 2014 (date of last IEA Site inspection) to 10 April 2017 (date of final Site visit conducted as part this audit). This report presents the findings of this audit.

The IEA assessed compliance with relevant approvals, licences and management plans applicable to PKCT. Detailed compliance registers identifying audit findings, comments and recommendations are presented in **Appendix A**. Non-compliances identified against relevant approvals are identified and discussed in Section 10.0.

PKCT's overall compliance status is summarised in Table ES-1.

Table 1 Overall Compliance Assessment and Audit Score

Relevant Approval	No. of Conditions Compliant	Number of Conditions Non-compliant	Number of Conditions Not Verified
Project Approval 08_0009	33	4	2
Environmental Protection Licence 1625	36	7	2
Statement of Commitments	21	0	0

Relevant Approval	No. of Conditions Compliant	Number of Conditions Non-compliant	Number of Conditions Not Verified
Drivers Code of Conduct	20	1	0

Of the 12 non-compliances, four were identified as having a medium risk level and the remaining 8 were identified as having a low risk level. A number of non-compliances were recorded relating to water management and were based on exceedances of licence criteria or as a result of pollution incidents recorded during the audit period. PKCT implemented a number of improvements to its water management system during the audit period, most notably a \$3 million upgrade to its Central Pond as required by a Pollution Reduction Plan in its Environment Protection Licence. No exceedances of Licence discharge criteria or incidents causing or threatening to cause material harm were recorded in 2016. Other environmental improvements made during the audit period are summarised in Section 3.5.

In addition the scope of the audit included a review of the adequacy of the strategies, plans and programs required under the Project Approval. The findings of the adequacy review of management plans and systems are presented in Sections 8.0 and 9.0. Continuous improvement opportunities were identified and are presented throughout the report and summarised in Section 10.0.

1.0 Introduction

1.1 Background

AECOM Australia Pty Ltd (AECOM) was engaged by Port Kembla Coal Terminal (PKCT) to carry out an Independent Environmental Audit (IEA) of the Port Kembla Coal Terminal located at Port Kembla Inner Harbour, New South Wales (the Site).

The audit was completed in accordance with the Condition 5, Schedule 4 of DA 08_0009 (dated 12 June 2009) as issued by the Department of Planning and Environment (DP&E) and AECOM proposal (OPP-600759), dated 27 January 2017.

This is the third IEA to be carried out at the Site under DA 08_0009 and for the purpose of this audit, the audit period has generally been defined as from 28 March 2014 (date of last IEA Site inspection) to 10 April 2017 (date of Site last visit conducted as part this audit). This report presents the findings of this audit.

1.2 Audit Scope

The requirements for the IEA are set out in the NSW DP&E Development Consent DA 08_0009 granted by the NSW Minister for Planning on 12 June 2009 that require the following scope of works be carried out:

Condition 5, Schedule 4

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 suitably 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.

Condition 6, Schedule 4

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.

As defined in the conditions above, the audit team was required to include specialists in the fields of noise, air quality and traffic management.

1.3 Audit Methodology

This IEA was undertaken in accordance with AECOM Proposal dated 27 January 2017 (OPP-600759) to meet the scope of works described in Section 1.2 and in general accordance with *Australia/New Zealand ISO 19011:2014 Guidelines for auditing management systems*, following established audit procedures and practices that included documentation review, interviews, a site visit and verification activities. The audit process is described in Section 2.0.

Compliance checklists were developed by AECOM that included a list of conditions and commitments to be assessed for compliance, including DA 08_0009, PKCT Environmental Assessment Statement of Commitments and Environment Protection Licence (EPL) No.1625. These are discussed in the Compliance Review Section 10.0 and **Appendix A**.

1.4 Sensitive information

It is understood that information collected during the IEA may be sensitive. Documents used during the audit were kept secure and not distributed outside the relevant personnel involved in the audit.

1.5 Format of Report

The format of this report is as follows:

- Section 1.0 is an introduction and provides the scope and nature of the audit.
- Section 2.0 summarises the audit process and methodology.
- Section 3.0 briefly describes the operations at PKCT as observed during the Site inspection.
- Section 4.0 summarises the consultation with key regulatory agencies and stakeholders.
- Section 6.0 provides photographs of activities and issues observed during the Site inspection.
- Section 7.0 describes the approach to the assessment against the relevant standards, performance measures and statutory requirements.
- Section 8.0 presents the findings of the air, noise and traffic management specialists.
- Section 9.0 presents the findings of the review of the adequacy of the Environmental Management Strategy and environmental management and monitoring plans (not addressed by the specialists)
- Section 10.0 summarises the non-compliances and recommendations made throughout the report.
- Section 11.0 provides the limitations of the Report.

Appendix A is a tabulated review of the results of the assessment against the Conditions of Approval, Environmental Protection Licence (EPL) conditions and Statement of Commitments (SoCs) conditions.

This Report provides a summary of findings including details of non-compliances identified in the audit and recommended actions to improve compliance status. The report also includes recommendations where continuous improvement opportunities were identified.

2.0 Audit Process and Methodology

The audit was carried out in general accordance with *Australia/New Zealand ISO 19011:2014 Guidelines for auditing management systems* following established audit procedures and practices that included documentation review, interviews, a Site inspection and verification activities.

2.1 Audit Program

A summary of the audit programme is provided in **Table 2**.

Table 2 Audit Programme

Start Date	End Date	Actions	Location
09/03/2017	09/03/2017	Project kick-off meeting between AECOM Project Manager and PKCT	Teleconference
16/02/2017	31/03/2017	Draft Audit Checklists Prepared	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000
07/03/2017	31/03/2017	Consultation with relevant agencies	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000
03/04/2017	07/04/2017 & 10/04/2017	Site Inspection	Port Kembla Coal Terminal, Inner Harbour, Port Kembla, Wollongong, NSW
11/04/2017	06/06/2017	Draft Reporting	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000
06/06/2017	08/06/2017	Draft Report Comments	Port Kembla Coal Terminal, Inner Harbour, Port Kembla, Wollongong, NSW
08/06/2017	08/06/2017	Final Report	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000

2.1.1 Pre-audit Meeting

A pre-audit project kick-off telephone call was held on the 9 March 2017 between the following:

- Nick Ballard, Lead Auditor, AECOM.
- Helen Onus, Auditor and Project Manager, AECOM.
- Alex Chalk, Risk Manager, PKCT.
- Luke Pascot, Environmental Specialist, PKCT.

2.1.2 Document Review

AECOM requested, and PKCT provided, a number of documents prior to the Site inspection as part of the pre-audit preparation. The documents included, but were not limited, to the following:

- Annual Environmental Management Reports 2014/15 and 2015/16.
- Interim Environmental Management Report 2013/14, 2014/15 and 2016.
- EPL Annual Returns 2014/15 and 2015/16.
- Green and Golden Bell Frog Management Plan.
- Landscape Management Plan.
- Water Management Plan.
- Recycled Water Management Plan.
- Greenhouse Gas and Energy Efficiency Management Plan.
- Fire Management Plan.
- Driver's Code of Conduct.
- Implementation Program for Driver's Code of Conduct.
- Noise Management Plan and Monitoring Program.
- Waste Management Plan.
- Air quality monitoring results and assessments to demonstrate air criteria has been met for audit period.
- Evidence of incident reports to DP&E, EPA and other relevant agencies.
- Evidence of Completed Pollution Reduction Programmes (PRP) and evidence of submission to EPA.
- Evidence of progress with Environmental Improvement Programmes (EIP) and evidence of any communication with EPA.
- Incident Register.
- Examples of Corrective Action Requests.
- Any directions from the DP&E issued to site.
- Complaints register / report (date of consent to current).
- Incident register (date of consent to current), incident reports, evidence of notification of incidents to relevant agencies.
- Key correspondence with regulatory authorities in particular DP&E and EPA.
- Environmental Induction Program.
- Evidence of environmental training / inductions for personnel.
- Evidence of consultation with relevant government agencies on Environmental Management Plans.
- Evidence that community information and complaints telephone line is advertised

A number of environmental management related documents were also available on the PKCT website. The auditors gathered additional documents during and following the Site inspection. Documents used as part of the audit are referenced within this Report and in the Compliance Matrix presented in **Appendix A**.

2.1.3 Audit Checklist

An audit checklist was prepared prior to the site inspection, based on the requirements of DA 08_0009 and EPL 1625 (Refer to **Appendix A**).

2.1.4 Site Inspection

A two day Site inspection was conducted on 7 and 10 April 2017. The Audit Team consisted of the personnel listed in **Table 3**.

Table 3 Audit Team

Name	Position	Organisation	Site Inspection
Nick Ballard	Lead Auditor ^{Note 1}	AECOM	7 & 10 April 2017
Helen Onus	Auditor	AECOM	10 April 2017
David Rollings	Air Quality Specialist	AECOM	10 April 2017
Patrick Martinez	Noise/Acoustic Specialist	AECOM	10 April 2017
Cameron Ward	Traffic Management Specialist	AECOM	7 April 2017

^{Note 1} Mr Ballard left AECOM on 20 April 2017 and had no further involvement with the audit. Helen Onus took over as Lead Auditor.

Nick Ballard, Helen Onus, David Rollings, Patrick Martinez and Cameron Ward were approved by the DP&E as suitably experienced and qualified to undertake the independent audit as required by Clause 23 (a) of the Project Approval in a letter dated 2 March 2017 (presented in Appendix C).

Nick Ballard is registered by Exemplar Global as a Certified Lead Auditor for Environmental Management, Site Contamination Assessment and Compliance Auditing. Helen Onus is registered by Exemplar Global as a Certified Auditor for Environmental Management.

The names of personnel interviewed during the Site inspection are provided in **Table 4**.

Table 4 Name and Position of Personnel Interviewed During Site Inspection

Name	Position	Company	Remarks
Alex Chalk	Risk Manager	Port Kembla Coal Terminal	Attendance at closing meeting. Accompanied auditors on-site inspection. Participated in interviews.
Luke Pascot	Environmental Specialist	Port Kembla Coal Terminal	Attendance at opening and closing meetings. Accompanied auditors on-site inspection. Participated in interviews.
Mark Beale	Planning Manager	Port Kembla Coal Terminal	Attendance at opening meeting. Participated in interviews.

For each checklist question and/or requirement audited during the audit process, AECOM:

- Conducted interviews with selected Site personnel.
- Evaluated the data, reports and other evidence to substantiate whether the question had been answered.
- Identified any data gaps, inconsistencies, errors and uncertainties.
- Assessed the reliability and quality of information provided.
- Assessed environmental management performance.
- Completed a summary of findings and recommendations.

Photographs taken during the Site inspection are provided in Section 6.0.

2.1.4.1 Opening and Closing Meetings

In accordance with *ISO 19011:2014 Guidelines for auditing management systems* an opening and closing meeting was held during the Site inspection. Details of attendees at both meetings are provided in **Table 4**, records of the meetings are provided in Appendix B.

2.1.5 Audit Verification Activities

The auditors undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and a site inspection. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information, such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site (e.g. review of management plans). The Site inspection concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspection and interviews over two days.

3.0 Port Kembla Coal Terminal Operations

3.1 PCKT Overview

PKCT is located on the north side of the Port Kembla Inner Harbour south of Wollongong, NSW and is described as Lot 22 in Deposited Plan (DP) 1128396 as shown in Figure 1.



(Source: <http://maps.six.nsw.gov.au/>)

Figure 1 Port Kembla Coal Terminal

On 31 May 2013, NSW Ports acquired a long-term lease of Port Kembla from private landholders, with no change to the leasing arrangement or land occupancy for PKCT. Land is leased to PKCT under a 20 year agreement, plus 20 year option. The lease period commenced in 1990 and is due to finish in 2030. The Site is operated by six, equal shareholders who are all coal producers on the Southern and Western coal fields of NSW (the Consortium).

The Consortium comprises:

- Glencore Pty Ltd.
- Illawarra Coal.
- Xstrata Coal.
- Centennial Coal Company Ltd.
- Wollongong Coal Ltd.
- Tahmoor Coal Pty Ltd.
- Peabody Energy Australia Pty Ltd.

Global resources company South 32 Pty Ltd manages the Site on behalf of the Consortium.

3.2 PKCT Operations

PKCT receives, assembles and loads coal from coalfields located in southern and western NSW for transport to international and domestic markets. The Site is the major coal intermodal facility in southern NSW for the transfer of coal from rail and road to ship.

PKCT has the following two bulk handling facilities:

- A Bulk Products Berth (Berth 101) that loads and unloads a range of bulk products.
- A high capacity Coal Berth (Berth 102) that handles the loading of coal.

3.3 Projects During Audit Period

The following projects were completed at the Site during the audit period:

- Period 2013 / 2014:
 - Berth 101 Timber Fender Repairs.
 - Berth 101 Pile Refurbishment.
 - Berth 101 Bollard Refurbishment.
 - Berth 102 Pile Refurbishment.
 - Berth 103 Shiploader Rail Repairs.
 - TS8 Pile Refurbishment.
 - BPB Stockpile Removal.
- Period 2014 / 2015:
 - Berth 101 Stockpile.
 - Building 69 and 72.
 - Belt Clean-up.
- Period 2015 / 2016:
 - Berth Rails 1 & 2.
 - Central Pond Upgrade.
 - HV Distribution.
 - Southern Demolition project.
 - Stockyard Rails Phase 2.
 - Stockyard Rails Phase 3.

3.4 Activities Occurring During the Site Inspection

Activities undertaken at the time of the Site inspection included:

- Unloading of coal via road trucks and trains.
- Distribution of coal to the main coal stockpile via overland conveyor and stackers.
- Preparation of Site for the removal of two reclaimers and three stackers and installation of replacement infrastructure - the PKCT Restoration and Compliance Project.

Photos of environmentally relevant aspects of the operation, taken during the Site inspection are provided in Section 6.0 and throughout the Report.

3.5 Improvements During the Audit Period

During the audit period, PKCT has implemented a number of environmental improvements most notably to its water management system. As a result of the number of exceedances of the Total Suspended Solids (TSS) criteria reported by PKCT in its Annual Returns, a PRP was added to the EPL to implement upgrades to PKCT's stormwater pollution control system (PRP 12). PKCT undertook the \$3 million project to upgrade the Central Pond which included works to improve the pond layout, capacity, pumps and inflow management. The project was completed in January 2016. PKCT undertook a Review of the Environmental Performance of the Upgrade Works in December 2016 and provided this report to the EPA. The report determined that:

Monitoring indicates that this objective has been met and PKCT has achieved the following:

- *Improved water quality in both the Central Pond and downstream Settlement Lagoon.*
- *A reduction in the time taken to clean the pond.*
- *A reduction in sedimentation in both the Central Pond and Settlement Lagoon.*
- *A safer, cleaner and more efficient cleaning access has been provided.*
- *Now able to operate an efficient, systematic pond cleaning program.*

The EPA considered that Stage 1(e) had been completed and removed the PRP from PKCT's EPL in January 2017.

Other activities and improvements during the audit period included:

- 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 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. Coagulant dosing is used on an as-needs basis.
- 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.
- An unsealed area near the Central Pond Pump was sealed in February 2016.
- Isolation of inflows into ponds to allow for the drying of slurry.
- Sealing of entry/exit ramps into ponds to minimise sediment 'drag' out of the ponds and onto internal roadways.
- All ponds are fitted with high and high-high alarms. New ultrasonic level sensors were installed in addition to the float switches already in place to better manage the pumping of water.

- The operating conveyor 'NC14' was recently upgraded. This has reportedly led to less coal deposits on the ground and an improvement in the cleanliness of the berth.
- A new 'Factory Talk' operating system was installed in late 2016 to replace previously used SCADA system. Factory Talk is used to manage the dosing of ponds, spray cycles on stockpiles, and road sprays amongst other functions.

The recent upgrades to the Central Pond and other improvements noted above were observed during the audit Site inspection.

4.0 Consultation

As part of the audit process, AECOM contacted key government agencies to seek their views on the environmental performance of the Site. Feedback obtained is discussed below.

4.1 Department of Planning and Environment

Feedback was sought on 7 March 2017 from the DP&E officer responsible for the Site. The officer provided a response to AECOM on 27 March 2017 indicating the Department was interested in the progress of noise and air quality management. Noise and air quality management have been addressed in Section 8.0 of this Report.

4.2 Environment Protection Authority

Feedback was sought on 7 March 2017 from the Environment Protection Authority (EPA) officer responsible for the Site. The AECOM Lead Auditor spoke with the EPA officer on 21 March 2017. The EPA officer reported that the Authority would like the IEA to consider dust management and the potential for further real-time air monitors at the Site.

It is understood that the EPA's involvement with the Site during the audit period has been in relation to EPL variations, specifically dust management and monitoring. The EPA officer's most recent Site visit was during the week commencing 13 March 2017 for an audit of the Site's Pollution Incident Response Management Plan. The EPA officer reported that there had been at least 12 Site inspections since 2014. The EPA officer reported that a lot of these inspections were associated with the Wagon Monitoring and Reporting Environmental Improvement Program that was completed on 30 September 2016. These inspections involved inspecting inbound coal train from various mines to look at the coal profile and coal spillage on the wagons. It is understood that there were also a number of inspections that involved observing the coal unloading process at the Site.

The EPA officer also noted that the Site was good at communicating with the EPA and that the most recent communications have concerned variations to the EPL.

4.3 Office of Environment and Heritage

Feedback was sought on 7 March 2017 from the Office of Environment and Heritage (OEH) officer responsible for the Site. The AECOM Lead Auditor spoke with the OEH officer on 22 March 2017. The OEH officer reported that OEH has had very limited contact with the Site during the audit period.

It is noted that the OEH officer did communicate with the Site via email on 6 October 2016 concerning Green and Golden Bell Frog annual monitoring and advised the Site that ongoing monitoring continue in the event that the species re-occupies the Site. Site management, on a recommendation from their ecological consultant in February 2016, questioned whether the annual monitoring program needed to continue given the Green and Golden Bell Frog had not been identified on-site since 2011. Refer to **Appendix A**, DA 08_009, Schedule 3, Condition 14 for further details.

4.4 Community Consultative Committee

Feedback was sought on 7 March 2017 from the nominated member of the Community Consultative Committee (CCC) for the Site. The AECOM Lead Auditor spoke with the nominated member of the CCC on 22 March 2017. The member reported that generally the CCC was happy with the way PKCT was managing the Site and noted the following:

- Black dust is a community concern in the area around the Site; however, the member noted that the black dust may not be predominantly coal dust and may not be from PKCT.
- Quarterly community meetings are held and are attended by the member.
- Traffic impacts have improved, in particular road cleanliness.
- PKCT Site management is open to managing community concerns.

During the consultation process, AECOM requested contact details from PKCT for the Department of Primary Industries Water, Wollongong City Council and the Department of Resources and Energy; however, were informed by PKCT that they do not typically correspond with these agencies. Therefore only the agencies that PKCT reported it had been in communication with during the audit period were contacted.

5.0 Environmental Performance

This Section addresses the requirement of the scope of works to “*assess the environmental performance of the project*”. The auditors based the assessment of the environmental performance of the Site on the following:

- Assessment of implementation of management and monitoring plans described in Section 5.1.
- Assessment of compliance with the DA 08_0009 and EPL 1625. The findings of this assessment are provided in the Compliance Matrix presented in **Appendix A** with the identified non-compliances and associated recommendations summarised in Section 10.0.
- Review of complaints received by the Site during the audit period (Section 5.2).
- Review of incidents reported during Site activities during the audit period (Section 5.3).

5.1 Environmental Management Plans and Monitoring Programs

PKCT has an Environment Management System that is certified to AS/NZS ISO 14001:2004. PKCT was re-certified to AS/NZS ISO 14001:2004 (and AS/NZ ISO 9001:2008) on 18 November 2015. PKCT has developed the following management / monitoring plans and programs to monitor the environmental performance of the project and mitigate its effects on the surrounding environment:

- 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
- Noise Management Plan and Monitoring Program.
- Air Quality Management Plan, MP.HS.386
- Air Quality Management Plan Monitoring Program.
- 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

The assessment of adequacy of the above management plans is presented in Section 9.0. A review of the management plans relating to the specialist areas is provided in Section 8.0.

Implementation of the management plans is discussed under the specific CoA relating to those plans in **Appendix A**.

5.2 Complaint Management

PKCT operates a freecall Community Hotline 1800 111 448 for the purpose of receiving complaints or enquiries from the public. This number is provided on the PKCT website.

PKCT described the following process of recording and responding to complaints:

- Complaints (as well as incidents) are recorded in PKCT’s Event Management System (EMS).

- When a complaint is received by the call centre via the 1800 111 448 number, an SMS and email alert is sent to the pre-assigned list of PKCT managers.
- The first person available contacts the complainant and initiates the investigation process.
- The complaint is logged in EMS as event type: 'Community' and the following information entered: Event details (date, time, brief description, immediate actions taken); Preliminary Findings (root cause of the incident, suggested actions, assigned approver); Investigation Findings; Event Close Details (event close date, verified by).
- The complaint needs to be verified by someone other than the person who investigated the complaint.

EMS was demonstrated to the auditors during the site inspection. The auditors reviewed the Community Complaints Enquiries Register and the 'Event Report' for the complaints received during the audit period. Two complaints and one enquiry were recorded during the audit period.

The enquiry received in May 2016 related to use of compression breaking in the middle of the night. This is discussed further under Section 8.2.4.

One complaint was received in December 2014 in relation to haulage trucks parking near the takeaway premises at the intersection of Princes Highway and Mt Ousley Road. This is discussed further in Section 8.3.4.

One complaint was received in April 2015 regarding black dust on the complainant's verandah. This is discussed further in Section 8.1.3.

In general, it was considered that community complaints were adequately responded to, investigated, and closed out.

5.3 Incident Management

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:

- Minor – PKCT internal, routine via EMS
- Minor - PKCT internal, manager contacted
- Not material – EPA notification may be required
- Material – EPA notification required

There are also categories for 'Risk Ranking Potential Consequence' (low, moderate, high) and 'Potential Consequence Severity (Level 1, 2, 3 and 4).

Whilst the Notification Type includes a trigger for potential EPA notification, unless it has been noted within the event summary there is no way of determining which events have actually been notified to the EPA.

PKCT reported the following pollution incidents to the EPA during the audit period.

- Turbid water discharges on the 25-27th March and 4th and 6th April 2014 following a storm event. Following investigation by the EPA, PKCT were issued with a Formal Warning dated 21 July 2014.
- An incident on the 5 June 2014 where a pit sump 'Pump 9 Sump' overflowed to Port Kembla Harbour during a storm event. This incident was not considered material and was not immediately reported to the Environment Line but reported to the EPA via email on the 6 June 2014. Following investigation, the EPA issued PKCT with an Official Caution for the incident. 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'.

- 18 March 2015: washdown water containing coal fines was discharged into Port Kembla Harbour during routine cleaning of Shiploader 1 over Coal Berth 102. PKCT was deemed by the EPA to constitute a breach of the EPL Condition relating to Pollution of Waters (L1.1) and PKCT was issued with a Formal Warning dated 3 September 2015. In response, PKCT reviewed the Shiploader Launder design and implemented modifications. The 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.
- 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.
- 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. PKCT was 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.

It is noted that the above incidents were not reported to the DP&E and other relevant agencies (other than the EPA) within 24 hours.

PKCT has since implemented a number of improvements to its surface water management system (discussed further in Section 3.5). No incidents causing or threatening material harm to the environment were reported in 2016.

In general, it was considered that PKCT had an effective system in place for recording, investigating and reporting environmental incidents. Some recommendations and opportunities for improvement however have been identified relating to incident management and are provided in Section 10.0 and summarised as follows.

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 (in addition to the EPA) within 24 hours.

REC-2017 06: 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).

OFI-2017 01: include a field in EMS for recording whether events have been notified to the EPA and other relevant agencies.

6.0 Site Inspection Observations

This section provides a brief overview of key observations made during the Site inspection on 3 April and 10 April 2017. The auditors were escorted by the Risk Manager who made himself available for this purpose.

Table 5 Site Inspection Photographs



Photo #	Comment	Photo
General		
5-1.	Waste water from the northern wash bay reports to a recycling system.	
5-2.	Spill response equipment was available at the northern wash bay at the time of the Site inspection.	




Photo #	Comment	Photo
5-3.	Upgrade works conducted during the audit period were observed to the Central Pond during the Site inspection.	
5-4.	Ground around the edge of the Central Pond had been sealed during the audit period to minimise sediment loading to the pond and to facilitate plant entry and exit to the pond.	
5-5.	<p>Four pipes from the following ponds discharge into the Settlement Lagoon:</p> <ul style="list-style-type: none"> · TS1 Pond · North Pond · Central Pond · Workshop Pond <p>It was noted that the pipes had hand written labels.</p> <p>OFI-2017-02 Consider more permanent labelling of the pipes for easy identification.</p>	




Photo #	Comment	Photo
5-6.	<p>The flocking station at the Settlement lagoon contained three fibreglass aboveground storage tanks containing. None of the aboveground storage tanks had secondary containment.</p> <p>Refer to OFI-2017-09.</p>	
5-7.	<p>Landscaped area near northern transfer station showing vegetation now well established.</p>	
Air Quality		
5-8.	<p>Coal Stockpile and water spray system</p>	



Photo #	Comment	Photo
5-9.	Coal Loading (drop height minimised during loading to minimise dust generation.	
5-10.	Dust Gauge monitor. Note the increased security since previous audit.	




Photo #	Comment	Photo
5-11.	Coal Stockpile Spray (note no sprays were operating on the day of the audit)	
5-12.	Coal truck unloading area.	
5-13.	Underside of coal conveyor feeding ship loader. Minimal coal noted.	



Photo #	Comment	Photo
5-14.	OSIRIS Monitoring Location (Southern Monitor)	
5-15.	Ship Loading maintaining a low drop height in the ship	



Photo #	Comment	Photo
5-16.	Control room screen showing the unloading point for the road unloading area.	
5-17.	Control room showing the stockpile spray system. No sprays were active during the site inspection.	


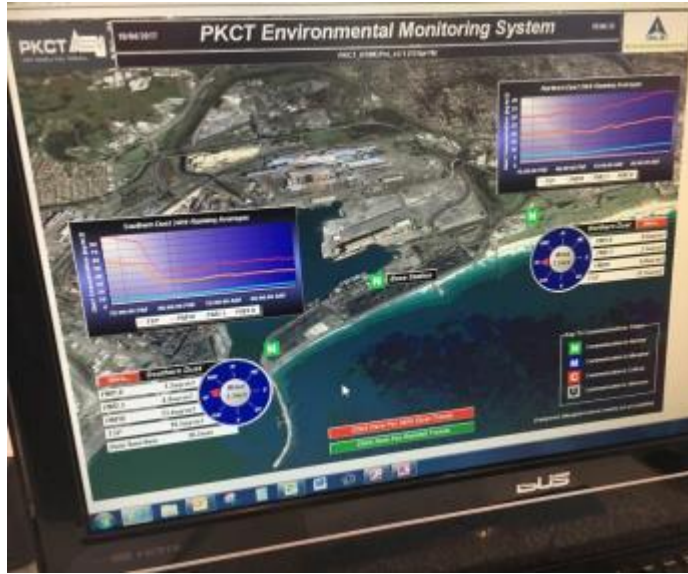

Photo #	Comment	Photo
5-18.	Control room spray system for the temporary stockpile area in the south of the site. Stockpile areas were not in use on the day of the inspection.	
5-19.	Control room environmental monitoring data screen showing meteorological data and dust monitoring data.	
Noise Management		
5-20.	Noise sources on-site: Stacker, reclaimers and conveyors	





Photo #	Comment	Photo
5-21.	Noise sources on-site: Reclaimer and conveyors	
5-22.	Noise sources on-site: Ship loading operations	
5-23.	Noise sources on-site: Coal train deliveries	
5-24.	Noise sources on-site: Coal truck deliveries	





Photo #	Comment	Photo
5-25.	Noise sources on-site: Unloading of coal trucks	
5-26.	Site observations identified potential noise nuisance associated with dangling chain/metal tubes at the truck wash area to alert truck drivers to lower their trailers. 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. Refer to OFI-2017-07	
Traffic Management		
5-27.	Truck positioned over the tipping grates.	
5-28.	Truck driver inspecting vehicle after tipping load and manually washing off trailer hitch. Manual wash facilities are provided between the tipping grates and the vehicle wash. It is understood that on some trucks these areas can be difficult for the truck wash to automatically clean.	






Photo #	Comment	Photo
5-29.	Truck entering vehicle wash after tipping load. Note the traffic light system to control vehicle entry, speed and information signs.	
5-30.	Trucks automatically activate a wheel wash after exiting the truck wash. The length of the wash is sufficient to ensure that the whole wheel radius is washed.	
5-31.	Example of quality of clean after a truck has passed through the truck wash. No signs of residual coal residue where observed during the site visit.	
5-32.	Secondary truckwash at southern section of terminal.	

Photo #	Comment	Photo
5-33.	Trucks observed queuing on Port Kembla Road during site visit. It is noted that this is an internal road and queuing is permitted on this road.	 A photograph showing a line of semi-trailers queuing on a paved road. The lead trailer is white with 'Subtrans' written on its side. The road is wide and appears to be an internal road at a port facility.
5-34.	A water sprayer vehicle was observed to be in operation during the site visit. Internal roads are sprayed with water to minimise dust generation.	 A photograph of a white water sprayer truck parked on a gravel or dirt road. The truck has a large white tank and a mechanical arm extending from the back. The sky is blue with scattered white clouds.

7.0 Compliance with Relevant Statutory Requirements

This Section fulfils the requirement to assess whether the Project is complying with the relevant requirements in its Project Approval and EPL.

7.1 Approvals and Licences

DA 08_009 was issued to PKCT on 12 June 2009 and comprised a number of schedules. This IEA assessed compliance with each condition of the schedules, with the focus areas of air quality, noise and traffic being dealt with separately, as summarised in Sections 8.1, 8.2 and 8.3 of this Report. There have been no modifications to DA 08_0009 since it was granted in 2009.

PKCT operates under EPL No. 1625 administered by the EPA. This is discussed further in Section 7.1.1.

Table 6 identifies the major approvals and licences in place for PKCT and provides relevant information were applicable. Compliance with the Trade Waste Permit was not assessed as part of this audit.

Table 6 Summary of Major Approvals and Licences

Title	Summary	Date Granted	Expiry
Project Approval 08_009	To receive coal and bulk products by public road 24 hours per day, 7 days per week (24/7) for a maximum of 10 million tonnes per annum (mtpa).	12 June 2009	-
Environmental Protection Licence 1625	Licence authorising water discharges, dust emissions and noise for coal works >5,000,000 T and shipping in bulk >5,000,000 T per annum.	Anniversary date: 1 April	-
Trade Waste Permit 33844	Permits the discharge of 'prohibited substances' to sewer in accordance with various quality requirements. Business activities are identified as: <ul style="list-style-type: none"> · Coal Terminal Wash bay, 120 kilolitres per year (kL/yr). · Cooling Tower Administration, 120 kL/yr. 	21 August 2015	Until Cancelled by Sydney Water Corporation or PKCT.

7.1.1 Environmental Protection Licence 1625

The Site operates under EPL 1625 that specifies the minimum environmental obligations to which to the Site must comply.

Scheduled activities are listed as:

- Coal Works.
- Shipping in Bulk.

Fee based activities comprise:

- Coal Works, greater than 5,000,000 Tonnes (T) annual handling capacity.
- Shipping in Bulk, greater than 500,000 T of annual capacity to load and unload.

7.1.1.1 Audit Period Variations to EPL 1625

Table 7 presents the variations to EPL 1625 during the audit period.

Table 7 Summary of Variations to EPL 1625 During the Audit Period

Date	Variation No.	Details
24 June 2014	1523013	<ul style="list-style-type: none"> · PRP 11 was amended - On 18 June 2014, PKCT requested that the EPA grant a three-month extension of time to PRP 11 to allow for refinements to the northern truck wash to be completed and considered in the report on the environmental performance of the Northern Truck Wash. The EPA amended PRP 11 to require a report on the environmental performance of the Northern Truck Wash to be provided by 30 September 2014. · PRP 12 was amended - PRP 12 required PKCT to seek approval to proceed with the implementation of the Central Pond Upgrade Project by 30 June 2014 and provide a report on the approval or otherwise of the Central Pond Upgrade Project by 31 July 2014. PKCT prepared a detailed design of the Central Pond Upgrade Project. On 18 June 2014, the licensee requested that the EPA grant a three-month extension of time to PRP 12 to allow for tenders to be sought for the Central Pond Upgrade Project. The EPA amended PRP 12 to require PKCT to seek approval to proceed with the implementation of the Central Pond Upgrade Project by 30 September 2014 and provide a report on the approval or otherwise of the Central Pond Upgrade Project by 31 October 2014. · PRP 13 was removed from EPL 1625 - The EPA removed PRP 13 - Algae Control Trial in Settlement Lagoon from EPL 1625 on the basis that the PRP had been completed. The trial involved the introduction of natural bacteria to the Settlement Lagoon across October 2013 to February 2013. The bacteria contained in the Ecotabs® are suggested to consume nutrients from the water at a rapid rate, which over time would out-compete the algae for food and reduce the severity of blooms. The Ecotabs® were found to mitigate nutrient levels; however, did not have a significant impact on reducing algal counts and associated pH levels.
15 September 2014	1546709	<ul style="list-style-type: none"> · Condition A2.1 was amended to reflect the location of the premises. · Condition A2.2 was amended to exclude pipelines and infrastructure association with the holder of EPL 654. · Condition P1.1 was amended to include the spatial location of dust disposition gauges and the addition of ambient monitors. · Condition P1.3 was amended to include the spatial location of the water discharge. · Wet weather overflow locations were added to Condition P1.3. · Condition L1.2 was removed and replaced with Condition L2.5. · Condition L2.4 was amended to remove pH and amend oil and grease concentration limits. · Conditions L2.6 to L2.9 were added to enable the licensee to use turbidity in place of total suspended solids if conditions are satisfied. · A condition to covered loads was added to Condition O3.3. · Condition O4.1 was amended to identify sedimentation ponds. · Condition O4.3 was removed. · Ambient air monitoring requirements were added at Condition M2.2. · Condition M2.3 was amended to add pH and oil and grease monitoring requirements. · Wet weather overflow monitoring requirements were added at Condition M2.3.

Date	Variation No.	Details
		<ul style="list-style-type: none"> · Condition M4.3 was removed. · Condition M7.1 was amended to refer to Condition L4.1. · Ambient air reporting requirements were added at Condition R4.1. · Wet weather overflow reporting requirements were added at Condition R4.2.
18 December 2015	1546709	<ul style="list-style-type: none"> · Addition of Condition U4 'EIP – Train Condition Exception Reporting'. · The EIP follows on from condition U2 of EPL 1625 [described above]. The EIP will be implemented across NCIG, PWCS and PKCT.
6 October 2016	1544414	<ul style="list-style-type: none"> · Addition of Condition U3 'EIP – Particulate Matter Control Best Practice Study'. · Addition of Condition U4 'EIP – Use of Real Time Particulate Monitoring Data for Operational Control'. · Deletion of Condition U2 'Wagon Monitoring and Reporting - Environmental Improvement Program'. The EPA agreed to cease the Wagon Monitoring Program at the end of September 2016. · Correction of address of Licenced Discharge Point 18 from 173 Corrimal Street to Links Seaside Apartments, 1 Ross Street, Wollongong.
21 November 2016	1546709	<ul style="list-style-type: none"> · Addition of condition U4 'EIP – Train Condition Exception Reporting'.
16 January 2017	1548264	<ul style="list-style-type: none"> · Removal of PRP 12 'Implement Upgrades to Stormwater Pollution Control System'. · The EPA received the effectiveness review from PKCT titled PKCT Central Pond Upgrade, Pollution Reduction Program 12, Stage 1(e) Review of Environmental Performance of the Upgrade Works. The EPA reported in a Notice of Variation dated 16 January 2017 (Ref: EF13/3447) that "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". The EPA considered that Stage 1(e) had been completed.

An assessment of compliance with each of the Conditions of the EPL is provided in **Appendix A**. A summary of the conditions assessed as non-compliant is provided in Section 10.0.

7.2 Compliance Assessment Criteria

The status of the performance of the Site during the audit, in respect of each of the Ministers Conditions of Approval (DA 08_0009) and EPL 1625 conditions is presented in **Appendix A**. Conditions considered to be not complied with or not verified have been listed in Section 10.0 of this Report.

Table 8 provides a summary of the performance categories in respect to the compliance status for each requirement or commitment as defined in the *Post Approval Requirements for State Significant Developments, Independent Audit Guideline* (NSW Government, October 2015, p7).

Table 8 Compliance Performance Categories

Performance Category	Definition
Compliant	Currently in compliance. Sufficient verifiable evidence was available to demonstrate that the intent and all elements of the requirement of the regulatory instrument had been complied with within the scope of the audit.
Non-compliant	Currently not in compliance. Sufficient verifiable evidence was available to demonstrate that the intent of one or more specific elements of the regulatory instrument has not been complied with within the scope of the audit.
Administrative non-compliance	A technical non-compliance with a condition of the consent that would not impact on performance and that is considered minor in nature.
Not verified	It has not been possible to determine whether compliance exists. Sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory instrument have been complied with within the scope of the audit was not available.
Not triggered	Condition not applicable at time of audit or had not been triggered
Not assessed	the condition has not been assessed as part of the scope of this audit
Noted	Conditions that are statements of requirement but not auditable.
Closed Out	Condition that was audited and closed during the previous IEA.

Table 9 provides a summary of the risk levels for non-compliances as defined in the *Post Approval Requirements for State Significant Developments, Independent Audit Guideline* (NSW Government, October 2015, p8).

Table 9 Risk Levels for Non-compliances

Risk Level	Definition
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliance with: <ul style="list-style-type: none"> · Potential for serious environmental consequences, but is unlikely to occur; or · Potential for moderate environmental consequences, but is likely to occur.
Low	Non-compliance with:

Risk Level	Definition
	<ul style="list-style-type: none"> · Potential for moderate environmental consequences, but is unlikely to occur; or · Potential for low environmental consequences, but is likely to occur.
Administrative Non-compliance	Applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

Comments are listed beside each condition to explain aspects of the audit review. Where considered relevant, observations have been made regarding specific compliance issues.

Where compliance with a condition had not been achieved during the audit period, but the Site could demonstrate current compliance, this has been recorded as such.

In general, no specific or rigorous assessment of documents required as part of meeting the Development Approval has been undertaken during the assessment, particularly where they have been signed off by other parties (for example, DP&E).

7.3 Status of 2014 IEA Recommendations

The previous IEA Report in (AECOM, 2014) assessed a total of five conditions as non-compliant. An additional 24 conditions were provided with continuous improvement recommendations. **Appendix B** summarises those conditions identified as non-compliant in the 2014 IEA (AECOM, 2014) and provides an update on the status of implementation of the recommendations using the categories outlined in Table 10. An update on the status of implementation of the opportunities for improvement associated with conditions assessed as compliant is also provided in **Appendix B**.

Table 10 Status of Previous IEA Non-compliance Performance Categories

Performance Category	Definition
Not Actioned	Recommendation was not actioned
Closed	Recommendations implemented or issues identified have been resolved
Ongoing	Recommendations not fully implemented or issues identified ongoing
N/A	Recommendation no longer considered applicable

In general, the majority of recommendations made in the 2014 IEA have been actioned.

8.0 SPECIALIST AREAS

This section addresses the specialist areas of air, noise and traffic as required by Condition 5, Schedule 4 of DA 08_0009.

8.1 Air Quality Management

8.1.1 Air Quality Management Overview

Air quality management is a requirement of all staff on-site and in particular all staff are required to where possible reduce the potential for dust generation. This is particularly important through the maintenance of the site and good housekeeping procedures.

Management of the site is focused on the management of the three main areas of potential dust generation:

- Stockpiles;
- Coal Receival and Ship loading; and
- Roads and Unsealed Areas.

The air quality management practices in place for these three areas are primarily focused around the application of water and through the minimisation of the potential for dust generation from dusty areas. The combination of stockpile water sprays, road water sprays, routine housekeeping, wind data based spray settings and the use of early warning forecast data from the Bureau of Meteorology (BOM) is an effective method for the control of dust generation.

The monitoring program implemented at the site with the real time (OSIRIS) dust monitors positioned along the wind axis where dust problems may be experienced is also considered an effective tool in the management of the dust.

PKCT installed an automated dust alert system in January 2015. Real time data is used to send automated alerts to warn of elevated dust levels and inform operational response. PKCT has an EIP in its EPL (U2.1) to review the effectiveness of the real time particulate monitoring system and associated management systems in place. The report associated with this EIP was due outside of the audit period and was not reviewed by the auditors. PKCT reported that it is planning on improving the interface between the alerts and the tower control system.

The use of the monitoring data to demonstrate the relative contribution of dust from the site at the monitoring locations is a good means by which the site can gauge its relative contribution to the dust in the Wollongong area.

On the day of the audit, the inspection examined the following areas:

- Main coal storage area including observation of the following:
 - Coal unloading onto stockpiles;
 - Water sprays operating on the edges of the truck unloading area;
 - The truck unloading area;
 - Condition of the site internal access roads;
 - Condition of the undersides of site conveyors;
 - Water cart operations (water cart observed filling but not in operation);
 - Storage area spray system on main storage piles and temporary storage areas; and
 - Small vehicle road usage.
- Observation of the main control room including screens used for air quality control and management; and
- Environmental monitoring locations (both dust gauge, meteorology and OSIRIS units).

In addition to the observation of operation of the PKCT, the site environmental officers were interviewed and a range of questions asked in relation to the environmental management of the site. Evidence was sited in relation to the good management of monitoring equipment and the integration of the air quality mitigation measures and management tools into the terminal operation planning. In particular the real-time ambient air quality monitoring and air quality management tools (forecast usage from BOM as a planning tool) were observed.

8.1.2 Air Quality Management Plan Adequacy Review

Air quality management at the Port Kembla Coal Terminal is controlled through the implementation of the site Air Quality Management Plan (AQMP – Version 10.0 dated 16.01.14). The management plan is a combination of active mitigation controls, passive mitigation measures and operational procedures which are all aimed at the minimisation of the generation and movement of dust from the site operations.

The management plan is segmented into the following main areas for dust control:

- Dust management strategies
- Dust monitoring and reporting
- Roles and responsibilities of all staff and the legislation underpinning the management of dust at the site.

The air quality management plan was reviewed both from the perspective of management procedures outlined in the plan, but also the measures implemented on the site and their effectiveness at minimising the generation of dust.

Generally, it was found that the AMP sufficiently addressed the requirements of Condition 14 of Schedule 3 of DA 08_0009.

8.1.3 Community Complaints

One complaint was received in April 2015 regarding black dust on the complainant's verandah. In response PKCT reviewed its dust management measures on the day and confirmed that the dust suppression spray system was operating at half hourly intervals. It was noted that strong southerly winds were blowing on the day. As this southerly was predicted to hit in the morning, PKCT proactively toolboxed the day shift and the coal stockpiles and roads were wet down in preparation for the wind event. The Environmental Specialist drove around the outside of site and did not observe any significant dust plumes originating from the site.

PKCT visited the complainant's premises and took a sample of the dust for analysis. The results of the analysis indicated that the coal grains made up 10-20% of the dust, the remainder being house dust with fibres, small sand grains, plant fragments and spores and insect fragments. The source of the coal dust could not be confirmed. The results of the analysis were discussed with the complainant and it was explained that although PKCT could not define the exact source of the coal within the dust sample, inspections on the day found that there was no visible dust coming from the site and that the dust suppression system was working as designed. It was also iterated that there are other potential dust sources to the south of the complainant's home. The complainant requested a copy of the report which was provided by email dated 28.04.15.

The auditors reviewed the correspondence with the complainant, file notes of actions and supporting reports and considered that the complaint was diligently investigated and closed out.

8.1.4 Summary of effectiveness of air quality management

In general, air quality at the PKCT was being managed effectively. Management effectiveness was evident through the low complaint history over the audit period and the reasonably low contribution of dust to the environment potentially attributable to PKCT. The site was clean and had no signs of areas where dust generation could be a problem. Control of the dust and proactive mitigation measures in place were considered appropriate for the site.

8.2 Noise Management

8.2.1 Noise Management Overview

Noise associated with PKCT's site operations are managed through PKCT's Noise Management Plan and Monitoring Program (NMP). The NMP sets out the requirements for the management and monitoring of noise associated with PKCT's site operations. The NMP was prepared to meet the requirements of the Project Approval DA 08-0009 S3.C2. The latest version of the NMP is Version 8, dated 16 April 2014.

Noise mitigation measures outlined in the NMP include:

- Rail receipt enclosed within a shed.
- Road and rail receipt conveyors initially underground then enclosed within conveyor galleries and transfer stations.
- Truck driver rules and the Drivers Code of Conduct (DCC) load covering requirements relating to driver practices, in particular compression braking and speed control.
- 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 put in place.

The rail receipt shed and enclosed conveyors were observed during the Site inspection.

The Drivers Code of Conduct Implementation Plan and DCC Monthly Reports for the audit period were reviewed. The Monthly Reports include a 'Checklist of Key Operational Focus Areas' which include the focus area of Noise Minimisation Controls.

The AEMRs were reviewed and 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"*.

8.2.1.1 Noise monitoring

Bi-annual noise monitoring was undertaken by PKCT's acoustic consultant, Wilkinson Murray, during the audit period. A review of the noise monitoring reports for the audit period indicated that no exceedances of the noise impact criteria were recorded. However, criteria was not included for high noise level events that have the potential to cause sleep disturbance (i.e. assessment of maximum noise levels or $L_{A1,1 \text{ min}}$).

The noise impact assessment undertaken as part of the Environmental Assessment included an assessment of sleep disturbance, given that operations occur 24 hours, seven days per week. The assessment concluded that the potential of high noise events disturbing the sleep of nearby residences is unlikely due to the buffer distance to nearby residential receivers and general background noise levels in the area.

PKCT submitted a request to the DP&E (by letter dated 30 August 2016) that bi-annual noise monitoring be discontinued as noise levels were below the noise impact criteria in all noise surveys undertaken since 2009. The DP&E accepted this request by letter dated 16 March 2017. The last noise monitoring survey was completed in April 2016.

It is recommended that if future noise compliance surveys are undertaken, a sleep disturbance assessment in accordance with the relevant EPA guidelines (i.e. investigation of maximum noise levels) be included.

8.2.2 Noise Management Plan Adequacy Review

The NMP was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014) assessed that the requirements of the NMP were met and that the NMP was prepared in consultation with the relevant agencies.

The NMP was last updated in April 2014 (Version 8). Given these amendments were minor it was not re-submitted to the Director-General for approval.

In the 2014 IEA (AECOM, 2014) it was recommended that PKCT:

- Update the Noise Management and Monitoring Plan to include discussion regarding the limitations posed by, and appropriateness of using the BarnOwl noise monitoring system.
- Conduct further analysis of the measurement results to verify whether the limitations of the BarnOwl system do not adversely impact the findings of the report.

A discussion of the suitability and limitations of the BarnOwl noise monitoring system has been included in Appendix B of the revised NMP and also in Section 4 of the bi-annual noise monitoring reports.

Since the last revision of the NMP, PKCT has, in consultation with the DP&E, ceased to conduct bi-annual noise monitoring (refer to Section 8.2.1.1). This has not been reflected in the NMP.

8.2.3 Noise Management Recommendations

REC-2017-09:

Revise the NMP with the following improvements:

- Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken.
- 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.

8.2.4 Community Complaints

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 consultant 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 11:45 pm - 12:00 am and 2.10 am - 2.25 am. The measurement results were assessed against the determined screening criteria for sleep disturbance ($L_{A1,1 \text{ min}}$). 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 at this location. PKCT requested the transport companies re-communicate the requirements and undertake driver monitoring to ensure compression braking at the Springhill Road/ Port Kembla Road intersection is not occurring. The enquiry was followed up with the resident to their satisfaction.

No other enquiries or complaints relating to noise were recorded during the audit period.

8.2.5 Summary of effectiveness of noise management

In general, PKCT was considered to be effectively managing noise from its operations. This was evident through the implementation of noise mitigation measures, compliance with the noise impact assessment criteria and lack of community complaints relating to noise.

8.3 Traffic Management

8.3.1 Traffic Management Overview

Traffic management of delivery vehicles to and from the site is enforced through the PKCT DCC and managed via the DCC Implementation Plan. As delivery drivers are not directly employed by PKCT, trucking companies are required to sign up to the DCC and implement appropriate training and monitoring of drivers. The latest version of the DCC is Version 6 dated 30 November 2015. Signature pages for this version from the following companies were sighted during the audit:

- Wollongong Coal Limited
- Illawarra Coal
- Bohud Transport Pty Ltd

It is noted that signature pages for further ten companies were sighted relating to Version 3 of the DCC dated February 2009. The companies include BulkTrans and Trazblend who continue to deliver to the terminal. The conditions within Version 3 of the DCC forms part of the Project Approval (DA 08_0009) for the terminal.

The DCC has been developed to highlight specific requirements to minimise community impacts and increase safety while delivering to PKCT. The DCC includes provision for:

- Haulage routes and specific restrictions on certain roads.
- Noise minimisation controls, including use of compression braking.
- Delivery requirements and conduct while delivering loads.
- Implementation and compliance monitoring requirements.

PKCT monitors implementation of the DCC through the following:

- Regular Task Observations using the PKCT Task Coach & Observation Sheet: Drivers Code of Conduct (F.HS.169). A screenshot of the Task Observations logged in PKCT's Sharepoint system indicated that Task Observations were typically being undertaken on a monthly basis.
- DCC Monthly Reports completed by the road transport companies and provided to PKCT.
- Quarterly meetings with the road user group.
- Annual DCC compliance audits of each of the transport companies. The auditors sighted the audits of Trazblend, Bohud and Bulktrans undertaken in February 2017.

8.3.2 Drivers Code of Conduct Adequacy Review

Since the completion of the 2014 IEA several of the recommendations included in the assessment have been implemented including updating of the monthly reporting template to include additional details of drivers to confirm that all drivers held valid licences for reporting period, inclusion of details of the new truck wash, and specific actions/investigations that will be undertaken when breaches of the DCC are reported (e.g. the '3 Strikes' process).

However it is noted that the overall structure and design of the DCC was developed over 8 years ago. In this time, there have been significant advances in technology which would allow the information and conditions with the DCC to be presented in a more functional way. This may include the use of maps, online tools and mobile phone applications. In addition, road conditions and environmental conditions may have changed on the arterial road network that the PKCT interacts with.

8.3.3 DCC Recommendations

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.

OFI-2017-03: Investigate ways to inform drivers of the requirements in the DCC and monitor compliance through the use of technology.

8.3.4 Community Complaints

One complaint was received in December 2014 in relation to haulage trucks 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 its drivers to drive only on their route to and from the mine site and PKCT. Bulktrans committed to directing their workforce to use only major arterial roads.

8.3.5 Summary of effectiveness of traffic Management

In general, PKCT was considered to be effectively managing the traffic impacts associated with its operations. This was evident through compliance with the requirements of the Project Approval DA 08_0009 relating to traffic and general compliance with the DCC. One non-compliance with a requirement of the DCC relating to trucks travelling to and from the site using arterial roads was noted. This was identified via a community complaint reporting trucks observed to be parking near the takeaway premises at the intersection of Princes Highway and Mt Ousley Road. The auditors consider that PKCT undertook appropriate action in relation to this complaint and no further deviations from the haulage routes have been recorded by PKCT since this time (December 2014).

A number of opportunities for improvement were identified relating to improving PKCT's internal monitoring of compliance with the DCC (summarised in Section 10.0).

The structure and design of the DCC could be improved to reflect advances in technology since it was first prepared (2009).

9.0 Review of Environmental Management

This Section fulfils the requirement to “*review the adequacy of strategies, plans and/or programs required under these approvals; and recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals*”.

The implementation of the management plans / programs is discussed in the compliance tables at **Appendix A**.

9.1 General Summary of Management Plan Adequacy Review

PKCT has established key management and monitoring plans/programs under the scope of the overarching PKCT Environmental Management Strategy and PKCT Environmental Management System as discussed in Section 5.1.

In general, these plans and programs are established and implemented in accordance with the consent conditions of DA 08_0009 and the requirements of PKCT's Environmental Management System. The management plans provide information to manage, monitor and report on environmental aspects and impacts associated with the operation. The following comments are made regarding the Environmental Management Strategy and Management Plans:

- The plans had been updated since the previous IEA (AECOM, 2014) to reflect minor changes in legislation and operational activities.
- Generally the plans were well prepared and included actions and timings allowing PKCT staff to understand roles and responsibilities and timeframes for specific requirements; however, the plans did not include a document revision section and therefore it was not possible to determine the period between a revision and the section/area of the plan that had been updated. For example, the Water Management Plan (Version 8) includes a document control section that shows the version and dates of revision as well as comments concerning any amendments.

The findings of the review of the adequacy of the management plans / monitoring programs and subsequent recommendations are provided as follows.

9.1.1 Overarching Recommendations Relating to Management Plans

REC-2017-11 - A document revision section should be included on management plans at their next review/revision so that the period between reviews as well as which section/area of the plan has been revised can be identified.

9.2 Environmental Management Strategy

An Environmental Management Strategy was prepared by PKCT in 2010 to meet the requirements Condition 1, Schedule 4 of Project Approval DA 08_0009. Formal approval of the Strategy from the DP&E could not be located but was assumed to have been received during the first IEA audit period.

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.

In general the Strategy was considered to adequately address the requirements of the Project Approval. A number of recommendations are provided as follows.

9.2.1 Recommendations

REC-2007-12 Revise the Environmental Management Strategy with the following improvements:

- Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation.
- 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
- 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.

9.3 Water Management Plan

The Water Management Plan (WMP) was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014, p.21) confirmed that “*Review of the most recent WMP (Version 5, August 2011) and related correspondence between PKCT and EPA/P&E indicates that the WMP has been updated and approved by relevant agencies, with this approval formalised and documented*”.

The WMP has been established and implemented by PKCT to address the requirement of Condition 13, Schedule 3 of Project Approval DA 08_0009. The WMP was last updated with minor amendments in November 2016 (Version 8) but was not submitted to the Director-General for approval.

From an adequacy perspective, the WMP generally covers the requirements of the DA 08_009. The objectives of the WMP are to satisfy the imposed statutory environmental requirements and PKCT policies.

The following observations are made concerning the WMP:

- Only one LDP (LDP 16, Settlement Lagoon) is referenced in the WMP; however, EPL 1625 contains five other points for the purposes of monitoring surface water: The five other points are:
 - LDP 22 TS1 Pond.
 - LDP 23 Central Pond.
 - LDP 24 Tower 3 Pond.
 - LDP 25 Southern Pond.
 - LDP 26 Workshop Pond.

While no discharge criteria are applied to the above LDPs, PKCT is required to monitor the concentration of oil and grease, pH and TSS from these LDP daily during any discharge. The WMP does not reference monitoring requirements at these LDPs. PKCT is also required to provide a report with the Annual Return in the event the LDPs overflow during the reporting period. The requirement for reporting as required by Condition R4.2 (Wet Weather Overflow Reporting) of EPL 1625 is not specified in the WMP.

- The correlation of EPL 1625 licenced discharge points and the water storage structures on-site was not clear in the WMP. For example the WMP references LDP 16 once; however, this reference does not indicate that LDP 16 is associated with the Settlement Lagoon. Therefore in order to fully understand which of the water storage structures is a licenced discharge point the reader is required to refer to EPL 1625.
- Condition L2.5 of EPL 1625 allows the criteria specified in Condition L2.4 (Water and/or Land Concentration Limits) to be exceeded only when a discharge occurs solely as a result of rainfall that exceeds a five day rainfall depth value of 90 mm. The WMP does not identify that this can only occur at LDP 16 as specified in EPL 1625.
- The Plan has not been updated to reflect recent upgrades to water management on site, in particular the Central Pond Upgrade Project.

9.3.1 Recommendations

REC-2017-13 – 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.

REC-2017-14 -Update the WMP with the following improvements:

- Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements.
- Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625.
- Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16.

9.4 Green and Golden Bell Frog Management Plan

The Green and Golden Bell Frog Management Plan (GGBFMP) has been established and implemented by PKCT to address the requirement of Condition 14, Schedule 3 of the DA 08_0009. The GGBFMP was last updated with minor amendments in November 2016 (Version 8) but was not submitted to the Director-General for approval.

The GGBFMP has been prepared in accordance with Appendix 3 of the ‘*Draft Recovery Plan: Green and Golden Bell Frog (Lesson 1829) Recovery Plan*’ (DECCW, 2005), *Best Practice Guidelines: Green and Golden Bell Frog Habitat* (DECC, 2008).

The previous IEA (AECOM, 2014, p.a-5) recommended that PKCT “*Review and update the GGBF Management Plan at least annually so that the document reflects the current state of operations on site. If no changes are made to the document, review date at least should be noted on the document to track reviews*”. The GGBFMP was last revised on 2 November 2016.

PKCT engaged an external consultant, Niche Environment & Heritage Pty Ltd, during the audit period to conduct diurnal and nocturnal surveys of ponds at PKCT. Niche (2016, Executive Summary) reported that “*No Green and Golden Bell Frogs or tadpoles were located during either the diurnal or nocturnal survey. Only one species of frog was located in the ponds on the Terminal, being the Persons Tree Frog. The Striped Marsh Frog was recorded at Greenhouse Park. The ongoing absence of records from the terminal facility and Greenhouse Park since 2011 indicates that the Green and Golden Bell Frog is no longer present on site. It is advised that Port Kembla Coal Terminal liaise with OEH to determine if the annual monitoring program needs to be continued and, if not, under what circumstances monitoring surveys should be undertaken*”. It is noted that Site management communicated Niche’s rationale to the EPA who forwarded the issue to the local OEH officer by email on 6 October 2016. The OEH officer replied by email to the EPA and PKCT on 17 October 2016 and recommended that Green and Golden Bell Frog monitoring continue on an annual basis, noting that “*The level of monitoring is not considered onerous and with the low level of monitoring it is possible that the species is persisting at these sites. In addition the nature of GGBF populations which can rapidly expand and retract from season to season means that even if it is currently unoccupied it may be re-occupied in the future*” (OEH, 2016 Pers Comms). Given the advice provided by OEH concerning ongoing monitoring AECOM concur that competent persons continue the annual surveys and that the GGBFMP and associated protocols continue to be implemented.

Generally, it was found that the GGBFMP sufficiently addressed the requirements of Condition 14 of Schedule 3 of DA 08_0009.

9.5 Landscape Management Plan

The Landscape Management Plan (LMP) has been established and implemented by PKCT to address the requirement of Condition 16, Schedule 3 of the DA 08_0009. The LMP was last updated with minor amendments in November 2016 (Version 8) but was not submitted to the Director-General for approval.

The previous IEA (AECOM, 2014, p.a-5) recommended that PKCT “*Review and update the LMP at least annually so that the document reflects the current state of operations on site, including ongoing*

maintenance of landscaping on site". The GGBFMP was last revised on 11 November 2016 and it is noted that Figure 1 (p.10) of the LMP identified these works for the audit period.

The LMP included details of screening trees that have been planted on the road receive earth bund and along the northern boundary as well as an implementation program.

During the Site inspection, a number of landscaped locations as identified in Figure 1 of the LMP were observed by the Auditors. Generally, it was found that the plan sufficiently addressed the requirements of Condition 16 of Schedule 3 of DA 08_009. No landscape related complaints had been received during the audit period which is an indicator of the effectiveness of the plan.

9.6 Greenhouse Gas and Energy Efficiency Plan

The Greenhouse Gas and Energy Efficiency (GHG&EE) Management Plan has been established and implemented by PKCT to address the requirement of Condition 17, Schedule 3 of the DA 08_0009. The Greenhouse Gas and Energy Efficiency Plan was last updated with minor amendments in December 2016 (Version 9) but was not submitted to the Director-General for approval.

The previous IEA (AECOM, 2014, p.22) noted that *"the GGEEMP has been updated and approved by relevant agencies, with this approval formalised and documented. The document has been improved through the alignment of the ESAP [Energy Saving Action Plan] to this plan, and the preparation of the plan in accordance with Guidelines for Energy Savings Action Plans (DEUS 2005)"*.

The previous IEA (AECOM, 2014, p.22) recommended that the Greenhouse Gas and Energy Efficiency Plan *"be reviewed and updated at least annually so that the document reflects the current state of operations on site. It is noted that data in the plan is now out of date, particularly NGER data (dated 2009). As such, the recommendation to review the GGEEMP to include information gathered as part of the ESAP process is an ongoing recommendation"*.

The Plan references and includes information from an NGER review undertaken by GHD in 2009. The Plan states that the review undertaken in 2009 found that *"based on the 2008-09 GHG emissions and electricity usage, PKCT does not meet the lower threshold for reporting"*. The Plan however does not specify the NGER reporting thresholds making it difficult to assess whether increasing emissions and electricity use would trigger reporting in the future. It is also noted that thresholds have decreased significantly since NGER reporting was first introduced. For example, the 2008-09 facility threshold was:

- 125 kt or more of greenhouse gases -carbon dioxide equivalence (CO₂-e)
- Production of 500 terajoules (TJ) or more of energy, or
- Consumption of 500 TJ or more of energy.

Whereas the current facility threshold is:

- 25 kt or more of greenhouse gases (CO₂-e) (scope 1 and scope 2 emissions)
- Production of 100 TJ or more of energy, or
- Consumption of 100 TJ or more of energy.

Table 9 of the Plan includes the methodology for calculating Scope 1 and Scope 2 emissions (extract from the 2009 NGER Review). Whilst the methodology may not have changed significantly since this time, emissions factors are frequently updated from year to year. The Plan should be updated to include the latest emissions factors or include a procedure for calculating emissions that explains where to source the latest emissions factors.

The plan notes that PKCT emits very small amounts of direct (Scope 1) greenhouse gas emissions as the majority of equipment is powered by electricity generated off-site (Scope 2 GHG emissions). The scope of the management plan is therefore to identify opportunities to reduce the small amounts of Scope 1 emissions and minimise electricity use through energy efficient operations. Considering the majority of PKCT's emissions are a result of electricity use (mostly associated with conveyors), there is little in the plan regarding minimising electricity usage. It was reported that during the planning phase, the Projects Team undertake a review of the efficiency of new plant and machinery. This commitment and how it is implemented is not reflected in the plan.

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. The GHG&EE Management Plan should be reviewed and revised in light of these changes.

9.6.1 Recommendations

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.

REC-2017-16 – Revise the GHG&EE Management Plan with the following improvements:

- Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered.
- Update the GHG&EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used.
- Include further details within the GHG&EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured.

9.7 Pollution Incident Response Management Plan

The Pollution Incident Response Management Plan (PIRMP) (Version 5, July 2016) was developed to meet the requirements of the *Protection of the Environment Operations Act 1997* and defines how external pollution reporting is to be undertaken.

PKCT internal management plans and procedures are referenced in the PIRMP for external reporting and internal incident investigation purposes. The following PKCT documents are referenced in the PIRMP:

- Environmental Aspects and Impacts Register.RG.HS.2.
- Hazardous Materials Management Procedure.PR.HS.118.
- Hazardous Materials Management Plan.MP.HS.322.
- Emergency Response to Environmental Incidents Procedure.PR.HS.81.
- Fire Management Plan.MP.BM.385.

AECOM undertook a high-level, summary assessment of adequacy against the content of the PIRMP, as outlined at Clause 98C of the *Protection of the Environment (General) Regulation 2009* and found a high level of compliance against the requirements identified in the Regulation. The following observation was made:

- The Figures referenced in the PIRMP did not correlate with the Figures presented in the plan.

It is noted that PKCT conducted safety training days in 2015 and 2016. The 2015 training day included an event scenario concerning a harbour discharge during ship loading and the process to report the incident. The 2016 training day included an emergency scenario of a tanker truck rolling and spilling 3,000 Litres (L) of liquid onto an internal roadway and internal drain. Trainees were required to use 'Emergency Scenario Cards' to facilitate their response.

9.7.1 Recommendations

REC-2017-17 - At the next revision of the PIRMP update the document so that referenced Figures correlate with those presented in the plan.

10.0 Summary of Non-Compliances and Recommendations

The auditors assessed compliance with the Project Approval DA 08-0009, Drivers Code of Conduct (as it forms an Appendix to the Project Approval), EPL 1625 and SoCs. The findings of this assessment is provided in **Appendix A**. The requirements considered to be non-compliant as well as those where compliance could not be verified and the associated recommendations have been consolidated and are summarised in Table 11.

For a number of requirements that were assessed as compliant or not applicable, opportunities for improvement (OFI) were made. These OFIs are summarised in Table 12.

Recommendations relating to observations of general environmental management, the adequacy of the various plans / programs and findings relating to air, noise and traffic management are included in Sections 8.0 and 9.0 and summarised in Table 13.

10.1 Summary of Non-compliances and Conditions Assessed as not verified

Table 11 Summary of Conditions / Requirements Assessed as Non-Compliant or Not Verified

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
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>	<ul style="list-style-type: none"> • EPL 1625 Annual Return 2013 / 2014. • EPL 1625 Annual Return 2014 / 2015. • EPL 1625 Annual Return 2015 / 2016. • Work Order S50804 – Water System, 30 January 2017. • Work Order S51377 – Water System, 10 March 2017. • Work Order S51393 – Water System, 6 March 2017. • Work Order S51401 – Water System, 6 March 2017. • Work Order S51418 – Water System, 6 March 2017. • EPL Updates & Water Sampling Procedure Training, October 2014 (PowerPoint®). • Meeting Invite – 28 October 2014. • Email – Environmental Specialist, to Shift Teams, Water Sampling Procedures, 12 November 2014. • PKCT Water Collection System, V10.3, 19 October 2012. 	<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"> • 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. • 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. <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>Non-compliant</p> <p>Low Risk</p>
DA 08_0009, S3.C12	<p>SURFACE WATER</p> <p>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</p> <p>Medium Risk</p>
DA 08_0009, S4.C2	<p>REPORTING</p> <p>Incident Reporting</p> <p>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>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.</p> <p>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.</p>	<p>Non-compliant</p> <p>Low risk</p> <p>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 (in addition to the EPA) within 24 hours.</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S4.C8	<p>ACCESS TO INFORMATION</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>	<ul style="list-style-type: none"> • http://www.pkct.com.au/community-and-environment/ • http://www.pkct.com.au/news/ • Email to DP&E dated 30.07.14 re 2013 / 2014 AEMR. • Email to Wollongong City Council dated 15.08.14 re 2013 / 2014 AEMR. • Email to EPA dated 15.08.14 re 2013 / 2014 AEMR. • Email to DP&E dated 28.07.15 re 2014 / 2015 AEMR. • Email to DP&E dated 28.07.16 re 2015 / 2016 AEMR. • Email to Wollongong City Council dated 15.03.17 re 2014 / 2015 and 2015 / 2016 AEMRs. • Email to EPA dated 15.03.17 re 2014 / 2015 and 2015 / 2016 AEMRs. • Email to DP&E dated 9.05.14 re 2014 IEA. 	<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&E that relevant agencies include the EPA and Wollongong Council.</p> <p>The 2013 / 2014 AEMR was provided to the DP&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&E by email dated 28.07.15</p> <p>The 2015 / 2016 AEMR was provided to the DP&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 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>Non-compliant</p> <p>Low Risk</p> <p>REC-2017-02 – Ensure the website includes the most recent revisions of the Environmental Management Strategy and management plans.</p> <p>REC-2017-03 – Ensure the IEAs are published on the website</p> <p>OFI-2017-04 – Consider changing the layout of the website to make it easier to navigate to the environmental management plans, monitoring reports, AEMRs and IEAs.</p>
EPL 1625, L1.1	<p>LIMIT CONDITIONS</p> <p>Pollution of Waters</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>	<ul style="list-style-type: none"> • 2015 / 2016 EPL Annual Return. • EPA Formal Warning Letter dated 3.09.15 (Notice Number 1533582). • Official Caution: Sump overflow event on 5 June 2014 dated 10.09.14 (Notice Number: 1523625). • Formal Warning Letter dated 19.07.16 (Notice Number 1542400) • Formal Warning Letter dated 25.07.14 (Notice Number:1523451) 	<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>	<p>Non-compliant</p> <p>Medium Risk</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding					Compliant Status & Recommendation	
			Component	LDP No.	Catchment Area (ha)	Volume (m ³)	Discharge to		
			1	Settlement Lagoon	LDP 16	NA	7,300	Garungaty Waterway	
			2	TS1 Pond	LDP 22	4.3	1,550	Settlement Lagoon	
			3	Central Pond	LDP 23	17.7	7,480	Settlement Lagoon	
			4	Tower 3 Pond	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>PKCT reported the following pollution incidents to the EPA during the audit period.</p> <ul style="list-style-type: none"> 25-27 March & 4-6 April 2014: Turbid water discharges following a severe storm event. 5 June 2014: Pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm event. 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. 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 2015. On 4 August 2015 PKCT received an email from the EPA indicating the EPA would be taking no further action concerning the incident. 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. <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"> Blocking the RCP stockpile drain to prevent contaminated water inflow Repairing the western containment wall of the stockpile where required to prevent seepage Diverting the flow from No.1 Berth South Position Pump 17 towards T3 Pond 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 <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 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>						

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation									
			<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>										
<p>EPL 1625, L2.1 & L2.4</p>	<p>Concentration Limits</p> <p>For each monitoring/discharge point or utilisation area specified in the table's 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>Point 16</p> <table border="1" data-bbox="344 934 902 1178"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>100 Percentile Concentration Limit</th> </tr> </thead> <tbody> <tr> <td>Oil & 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	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2015 EPL Annual Return. PKCT, No Date, PKCT Central Pond Upgrade, Pollution Reduction Program 12, Stage 1(e) Review of Environmental Performance of Upgrade Works. EPA, 2017, Notice of Variation of Licence No. 1625, 16 January 2017, Ref: EF12/3447. PKCT, Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922. Site Observations. PKCT, 2014, Environmental Monitoring Report, January 2015. PKCT, 2015, Environmental Monitoring Report, January 2016. PKCT, 2016, Environmental Monitoring Report, January 2017. PKCT, 2017, Environmental Monitoring Report, February 2017. EPL Water Quality Data.xlsx. Site Observations. 	<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"> Five TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 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. <p><u>2015:</u></p> <ul style="list-style-type: none"> Four TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 1 May 2015 = 60 mg/L, 10 May 2015 = 57 mg/L, 12 May 2015 = 110 mg/L and 13 May 2015 = 54 mg/L. <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 "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". 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 "measured monthly TSS average pre-upgrade [in the Central Pond] was 202 mg/L and as of June 2016 79 mg/L post upgrade". 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"> 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 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. 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. An unsealed area near the Central Pond Pump was sealed in February 2016. Isolation of inflows into ponds allows for drying of slurry. Sealing of entry/exit ramps into ponds minimises sediment 'drag' out of the ponds and onto internal roadways. <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>	<p>Non-compliant</p> <p>Low risk</p>
Pollutant	Unit of Measure	100 Percentile Concentration Limit											
Oil & Grease	Visible	Not Visible											
Total Suspended Solids	Milligrams per litre	50											

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
EPL 1625, O1.1	<p>OPERATING CONDITIONS</p> <p>Activities Must be Carried out in a Competent Manner</p> <p>Licensed activities must be carried out in a competent manner. This includes:</p> <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"> • PKCT Task Observation Sheet, Roads & Unsealed Areas Dust Control, 19 January 2017. • PKCT Task Observation, Environment Workshop and Store Areas, 13 February 2017. • Facilities Maintenance Service Agreement Spill Kit Audit Sheet, 27 October 2016. • Facilities Maintenance Service Agreement Spill Kit Audit Sheet, 20 January 2017. • T&D Metals and Demolitions, Unanderra example dockets dated 2.06.15, 5.06.15, 19.06.15 • 2014-15 Annual Return • Email to EPA dated 4.09.15 providing status of action plan. • EPA letter dated 29.09.15 attaching comments on progress against Action program 	<p>PKCT has established processes for managing the processing, handling, movement and storage of coal including:</p> <ul style="list-style-type: none"> • 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, • Under wagon monitoring to detect poorly loaded trains. • Spillage recovery systems and processes to recover as much product coal as possible • Event Management System for the investigation and corrective action of incidents and complaints <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 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&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>Non-compliant</p> <p>Low risk</p> <p>REC-2017-04 – Request from waste contractor that it provides the destination of waste taken off site.</p> <p>OFI-2017-05 – Update Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.</p>
EPL 1625, O2.1	<p>Maintenance of Plant and Equipment</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>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation																								
EPL 1625, O4.2	<p>The ponds must be maintained to ensure that sedimentation does not reduce their capacity by more than 20% of the design capacity.</p>	<ul style="list-style-type: none"> 2015 / 2015 EPL Annual Return. Site Observations. PKCT Pond Capacity Tables.xlsx. PKCT, Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922. 	<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"> 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 period. The Central Pond Upgrade project was completed in February 2016. 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. 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. <p>Given the reported Annual Return non-compliance for the period 2015 / 2016 this condition was found to be non-compliant.</p>	<p>Non-compliant Medium Risk REC-2017-05 – Update the Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet.</p>																								
EPL 1625, M2.1 and M2.2	<p>Monitoring Concentration of Pollutants Discharged and Air Monitoring Requirements</p> <p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by 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>Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19</p> <table border="1" data-bbox="344 1486 902 1604"> <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>Point 20, 21</p> <table border="1" data-bbox="344 1661 902 1808"> <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>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</td> </tr> <tr> <td>PM2.5</td> <td>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</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	Micrograms per cubic metre	Continuous	Continuously	Total Solid Particles				<ul style="list-style-type: none"> The air quality management plan and the results recorded in the facility monitoring database and annual reports demonstrate that the monitoring requirements have been achieved. Letter from EPA dated 15.07.16 re Assessment of Annual Return 2015-16 Letter to EPA dated 30.08.16 including update to Section C2 of 2015 / 2016 Annual Return. 	<p>Particulates – deposited matter was using dust deposition gauges at the specified locations (Points 1-9, 12, 15, 17, 18, 19). TSP, PM₁₀ and PM_{2.5} monitoring was conducted using OSIRIS instruments located north and south of the coal terminal (Points 20 and 21).</p> <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"> 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. 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. 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. <p>Due to the non-compliances with this requirement reported in the Annual Returns, this condition has been assessed as non-compliant.</p>	<p>Non-compliant Low risk</p>
Pollutant	Unit of Measure	Frequency	Sampling Method																									
Particulates – Deposited Matter	Grams per square metre per month	Monthly	AM-19																									
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Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
EPL 1625, R2.1	<p>Notification of Environmental Harm</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>	<ul style="list-style-type: none"> EPA Confirmation of incident report call to Environment Line dated 18.03.15 Email to EPA dated 18.03.15 subject: PKCT Wash-down Event 18/03/2015 Email to EPA dated 4.08.15 Subject: PKCT Shiploader Washdown Event 28/07/15 Email to EPA dated 28.08.15 Subject: PKCT Coal berth – harbour discharge while shiploading. EPA letter dated 19.07.16 issuing Formal Warning for breach of Licence Condition L1.1 in relation to the shiploading incidents during July and August 2015 Email to EPA dated 6.06.14 notifying sump overflow on 5 June 2014. EPA letter dated 18.09.14 attaching Official Caution Official Caution: Sump overflow event on 5 June 2014 dated 10.09.14 (Notice Number: 1523625). Email to EPA dated 10.04.14 re turbid water overflows following March / April 2014 storm event. 	<p>The following notifications were made to the Environment Line during the audit period:</p> <ul style="list-style-type: none"> 18 March 2015: washdown water containing coal fines was discharged into Port Kembla harbour during routine cleaning of Shiploader 1 over Coal Berth 102. 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. 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. <p>In addition the following were reported to PKCT's local EPA officer:</p> <ul style="list-style-type: none"> 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 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. 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'. <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>Non-compliant</p> <p>Low risk</p> <p>REC-2017-06 – 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>
PKCT Drivers Code of Conduct 016	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.	<ul style="list-style-type: none"> PKCT DCC Version 6 – Nov 2015 PKCT Implementation Program for DCC Version 6 –Nov 2016 Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> 2014 – October 2015 – February, April, August, December 2016 – January, May, August, November 2017 – February, March DCC Internal Audits Worksheets <ul style="list-style-type: none"> Trazblend – 21/02/2017 Bohud – 14/02/2017 Bulktrans – 16/02/2017 Community Complaints Enquiries Register 	<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 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 non-compliant.</p> <p>No other complaints or incidents have been recorded by PKCT during the audit period relating to trucks using the designated routes.</p>	<p>Non-compliant</p> <p>Low risk</p> <p>Refer OFI-2017-15</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S2.C12	Demolition 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.	<ul style="list-style-type: none"> Site observations. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. 	<p>The AEMRs for 2013 / 2014 and 2014 / 2015 noted that “PKCT did not undertake any demolition projects required to conform to Australian Standard AS2601-2001 in this reporting period”.</p> <p>The AEMR for 2015 / 2016 (p.13) noted that “PKCT completed the demolition and removal of PKCT’s Conveyors “C3”, “C6” (half), “NC15” head end gantry, “NC16”, Transfer Tower “T1”, Old Road Dump Station shed and Control Room, Coke Screener and Feed Hopper and Reclaim Hopper. The works were undertaken to allow the replacement of the yard machines as part of PKCT’s Restoration and Compliance Project, particularly the replacement of the existing stackers and Reclaimers. All completed works were carried out in accordance with Australian Standard AS2601-2001”.</p> <p>The demolition project was reportedly managed by the Project Team using specialist demolition contractors.</p> <p>During the 2016/2017 reporting period, PKCT plans to complete demolition of “Reclaimer 1” and “Reclaimer 2” as well as planning for the demolition of “Stacker 1”, “Stacker 2” and Stacker 4”.</p> <p>The AECOM Auditors are not building specialists and no adequacy assessment of the demolition process has been conducted, nor any other assessment related to demolition management.</p>	Not verified
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&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&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&E for approval.</p>	Not verified REC-2017-07 – 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.
EPL 1625, M7.1	OTHER MONITORING AND RECORDING CONDITIONS Noise Monitoring 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.	<ul style="list-style-type: none"> 07355-NM-9 Noise Monitoring July 2014 VerA_FINAL 07355-NM-10 Noise Monitoring December 2014 VerA_JM_Final Report 07355-NM-11 Noise Monitoring June 2015 VerA_JM 07355-NM-12 Noise Monitoring December 2015 VerA 07355-NM-13 Noise Monitoring_VerA_April 2016 Letter to EPA dated 30.08.16 Letter to DP&E dated 30.08.16 DP&E letter re 170316_AEMR amendments_signed letter 	<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&E (by letters dated 30.08.16). This request was accepted by the DP&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 demonstrated, this condition could not be verified.</p>	Not verified REC-2017-08 –Seek a variation to the EPL to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.
EPL 1625, M7.2	The noise monitoring program must be reviewed by the licensee. If no exceedance of the criteria occurs for 6 years and the EPA is satisfied with the review, noise monitoring will not be required to continue.		Refer M7.1 above	Not verified

10.2 Additional Opportunities for Improvement (not related to non-compliances)

The following table has been reproduced from **Appendix A**. For details on the requirement, and for further discussion of the issue, please refer directly to the tables in **Appendix A**. Many recommendations are based around continuous improvement opportunities identified during the audit and do not necessarily represent immediate potential non-compliance issues.

Table 12 Recommendations for Conditions Considered Compliant for Improved Compliance and Continuous Improvement

Condition #	OFI #	Opportunity for Improvement
DA 08_0009		
S2.C7	OFI-2017-06	PKCT to introduce a procedure to request/ review and record compliance of movements of trucks along Bellambi Road at regular intervals when coal receipt from the NRE No.1 Colliery re-commences.
S3.C3	OFI-2017-07	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.
S3.C8	OFI-2017-08	Consider modifying the display to align the north on the maps with north on the displays.
S3.C20	OFI-2017-09	Investigate the option of providing secondary containment for the flocculent Coreshell 71303 tank to offer additional protection from accidental release to the harbour
S4.C1	OFI-2017-01	Include a field in EMS for recording whether events have been notified to the EPA and other relevant agencies
S4.C4	OFI-2017-10	Ensure that future AEMRs include: <ul style="list-style-type: none"> · A map showing the regional context · A summary of any community engagement activities and community contributions undertaken during the reporting period · Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis.
EPL 1625		
M1.3	OFI-2017-11	Ensure the contractor undertaking the depositional dust monitoring includes a record of the time the depositional dust gauges were collected.
M2.3	OFI-2017-12	Review the requirements of the POEO Act for publishing monitoring data
M5.2	OFI-2017-13	Consider adding the following fields to the 'Event Report' to ensure they are always captured: <ul style="list-style-type: none"> · method by which complaint was made; · complainant personal details

Condition #	OFI #	Opportunity for Improvement
R4.2	OFI-2017-14	The EPL Water Quality Data spread sheet should include a column that indicates whether samples were taken during an overflow event or were part of the routine monitoring program.
Drivers Code of Conduct		
006, 008, 014, 016, 019, 020	OFI-2017-15	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: <ul style="list-style-type: none"> · speed limits on Bellambi Lane · no compression braking approaching the intersection of Port Kembla Road and Springhill Road and on Masters Road · ensuring tailgates are locked before leaving PKCT · using designated routes to and from site · limiting noise where possible on Bellambi Lane
006	OFI-2017-16	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 that the audits were undertaken.
009 & SoC 16	OFI-2017-17	Consider introducing a process for monitoring trucks exiting the truck wash to ensure the effectiveness of the facility.
011	OFI-2017-18	Include a check of operating vehicles to minimise noise within the Internal Audit Worksheets.
Statement of Commitments		
SoC 2	OFI-2017-19	Include CCC meeting minutes on the PKCT website

10.3 Summary of additional Recommendations and Opportunities for Improvement

A summary of the recommendations made as a result of the adequacy review of the management plans (Sections 8.0 and 9.0) and site observations (Section 6.0) is provided in Table 13.

Table 13 Summary of Recommendations and OFIs relating to Management Plans and site Observations

Source	#	Recommendation / Opportunity for Improvement
Site observation	OFI-2017-02	Consider more permanent labelling of the pipes for easy identification.

Source	#	Recommendation / Opportunity for Improvement
Noise Management Plan	REC-2017-09	Revise the NMP with the following improvements: <ul style="list-style-type: none"> Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken. 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.
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.
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.
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.
Environmental Management Strategy	REC-2017-12	Revise the Environmental Management Strategy with the following improvements: <ul style="list-style-type: none"> Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation. 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 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.
Water Management Plan	REC-2017-13	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.

Source	#	Recommendation / Opportunity for Improvement
Water Management Plan	REC-2017-14	Update the WMP with the following improvements: <ul style="list-style-type: none"> · Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements. · Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625. · Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16.
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.
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"> · Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered. · Update the GHG&EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used. · Include further details within the GHG&EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured.
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.
2014 IEA OFI carried forward	OFI-2017-20	Update the Settlement Lagoon Cleanout Process document

11.0 Limitations

AECOM Australia Pty Limited (AECOM) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Port Kembla Coal Terminal Pty Ltd and only those third parties who have been authorised in writing by AECOM to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work and for the purpose outlined in the AECOM Proposal – 2017 Independent Environmental Audit, Port Kembla Coal Terminal (OPP-600759) dated 27 January 2017.

Where this report indicates that information has been provided to AECOM by third parties, AECOM has made no independent verification of this information except as expressly stated in the Report. AECOM assumes no liability for any inaccuracies in or omissions to that information.

This Report was prepared between 16 February 2017 and 10 June 2017 and is based on the conditions encountered and information reviewed at the time of preparation. AECOM disclaims responsibility for any changes that may have occurred after this time.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this report unless otherwise agreed by AECOM in writing. Where such agreement is provided, AECOM will provide a letter of reliance to the agreed third party in the form required by AECOM.

To the extent permitted by law, AECOM expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report. AECOM does not admit that any action, liability or claim may exist or be available to any third party. Except as specifically stated in this section, AECOM does not authorise the use of this report by any third party. It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the Site.

12.0 References

AECOM Australia Pty Ltd, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit Report, 17 June 2014, Ref: 60316484.

New South Wales Government, 2015, Post Approval Requirements for State Significant Developments, Independent Audit Guideline, October 2015.

Documents used as part of the audit are referenced as part of the text discussing compliance status in **Appendix A**.



Appendix A

Compliance Matrix

Table 1: Project Approval DA 08_0009

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S2.C1	Obligation to Minimise Harm to the Environment The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the project.	-	Other than where issues have been identified, in general PKCT appeared to be compliant with its obligation to minimise harm to the environment. The Environmental Management System, Environmental Management Strategy and associated management plans and procedures have been established and generally implemented to identify, plan for and manage environmental aspects and impacts related to the operation of the PKCT.	Compliant Refer to the recommendations within this Audit Report for areas of non-compliance and identified opportunities for improvement.
DA 08_0009, S2.C2	Terms of Approval The Proponent shall carry out the project generally in accordance with the: a) Environmental Assessment; b) Response to Submissions; c) Statement of Commitments (see Appendix 2); and d) conditions of this approval.	<ul style="list-style-type: none"> • Cardno Forbes Rigby, 2008, Environmental Assessment, Existing Operations & Increased Road Receival Hours for Port Kembla Coal Terminal, 9 September 2008 • Statement of Commitments • Response to Submissions • PA 08_009 	Based on a high level review of these documents, PKCT is considered to be carrying out operations in general accordance with the EA, Response to Submissions and Statement of Commitments. A detailed review of compliance with the EA was not undertaken. An assessment of compliance against the Conditions of Approval is included in this Appendix. Other than the non-compliances identified, PKCT was carrying out operations generally in accordance with the Conditions of Approval.	Compliant
DA 08_0009, S2.C3	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.	-	Noted.	Noted
DA 08_0009, S2.C4	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.		Site management reported that it has not been directed by the Director-General to revise any plans, strategies or programs.	Not triggered
DA 08_0009, S2.C5	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.	<ul style="list-style-type: none"> • DP&E letters dated 25.03.14 and 12.08.14 	a) The majority of plans and strategies were submitted and assessed by the Director-General during the previous audit period. The DP&E review of the 2012-2013 AEMR included a request that future AEMRs include a comparison of the monitoring results for noise and air quality with the results from previous years and identification of any trends in noise, air quality and waste monitoring results (DP&E letter dated 25.03.14). PKCT complied with this request and the 2013-2014 included the comparison to previous years monitoring and identification of trends to the DP&E's satisfaction as confirmed by DP&E letter dated 12.08.14. b) Site management reported that there has been no known request from the Director-General concerning implementation of the plans during the audit period.	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S2.C6	<p>Limits on Approval</p> <p>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:</p> <p>a) reviews the transport related impacts associated with the trucks being used to deliver coal and bulk products to the terminal;</p> <p>b) demonstrates that these impacts are generally consistent with the predicted and/or approved impacts; and</p> <p>c) examines whether there any other reasonable and feasible measures that could be implemented to minimise these impacts.</p> <p>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.</p>	<ul style="list-style-type: none"> PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Drivers Code of Conduct Monthly Reports for February 2015, April 2015, August 2015, January 2016, May 2016, August 2016, November 2016, February 2017 and March 2017. 	<p>PKCT receives monthly reports from each of the three transport companies summarising the tonnes of each product delivered on major arterial road (sighted examples). The Environmental Specialist combines the volumes to determine the total tonnes of coal and bulk products received at the site by public road.</p> <p>A review of the AEMRs for the audit period indicated that PKCT were well within the limit of 7.5 million tonnes per year limit. The maximum volume received by public road was 4.4 million tonnes over the 2014/2015 AEMR period. As such the requirement to submit a report seeking approval for exceeding this limit was not triggered.</p>	Compliant
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&A Act.</p>	<ul style="list-style-type: none"> PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Drivers Code of Conduct Version 6 dated 30.11.15. Activity Report for vehicle BX31JC for period 5.05.16 to 26.05.16. Toolbox Talk DCC refresher records for August 2016 and April 2017. PKCT Task Coach & Observation Sheet: Truck Drivers Code of Conduct completed forms dated 25.04.14, 26.12.15, 26.04.16, 6.05.16, 20.06.2016 and 21.12.16. 	<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 & 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 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>	<p>Compliant</p> <p>OFI-2017 06: PKCT to introduce a procedure to request/ review and record compliance of movements of trucks along Bellambi Road at regular intervals when coal receipt from the NRE No.1 Colliery re-commences.</p>
DA 08_0009, S2.C8	<p>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.</p>	-	<p>Other than as discussed under Condition S2.C7 above, coal and bulk product was being received at the site twenty four hours per day, seven days per week.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S2.C9	Management Plans/Monitoring Protocols With the approval of the Director-General, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	<ul style="list-style-type: none"> AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014. 	Site management reported that management plans were initially submitted in one submission as detailed in the previous IEA (AECOM, 2014). Revisions to management plans have been undertaken on a progressive basis as discussed under the conditions specific to each plan.	Compliant
DA 08_0009, S2.C10	Surrender of Consents 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.	<ul style="list-style-type: none"> AECOM, 2011, Port Kembla Coal Terminal, 2011 Independent Environmental Audit, 11 May. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. 	This requirement was required to be actioned within 12 months of 12 June 2009 and was assessed in the 2011 IEA. It is therefore considered closed.	Closed
DA 08_0009, S2.C11	Structural Adequacy 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. Notes: <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	<ul style="list-style-type: none"> Site observations. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. 	<p>Site management reported that no buildings were renovated, removed or rehabilitated during the audit period. No new structures were observed by the auditors during the site inspection.</p> <p>The AEMRs for 2013 / 2014, 2014 / 2015 and 2015 / 2016 noted that no buildings were renovated, removed or rehabilitated during the audit period and that "Facilities maintenance is carried out onsite in accordance with legal and other requirements including applicable Australian Standards and the Building Code of Australia".</p> <p>This requirement has not been triggered.</p>	Not triggered
DA 08_0009, S2.C12	Demolition 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.	<ul style="list-style-type: none"> Site observations. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. 	<p>The AEMRs for 2013 / 2014 and 2014 / 2015 noted that "PKCT did not undertake any demolition projects required to conform to Australian Standard AS2601-2001 in this reporting period".</p> <p>The AEMR for 2015 / 2016 (p.13) noted that "PKCT completed the demolition and removal of PKCT's Conveyors "C3", "C6" (half), "NC15" head end gantry, "NC16", Transfer Tower "T1", Old Road Dump Station shed and Control Room, Coke Screener and Feed Hopper and Reclaim Hopper. The works were undertaken to allow the replacement of the yard machines as part of PKCT's Restoration and Compliance Project, particularly the replacement of the existing stackers and Reclaimers. All completed works were carried out in accordance with Australian Standard AS2601-2001".</p> <p>The demolition project was reportedly managed by the Project Team using specialist demolition contractors.</p> <p>During the 2016/2017 reporting period, PKCT plans to complete demolition of "Reclaimer 1" and "Reclaimer 2" as well as planning for the demolition of "Stacker 1", "Stacker 2" and Stacker 4".</p> <p>The AECOM Auditors are not building specialists and no adequacy assessment of the demolition process has been conducted, nor any other assessment related to demolition management.</p>	Not verified

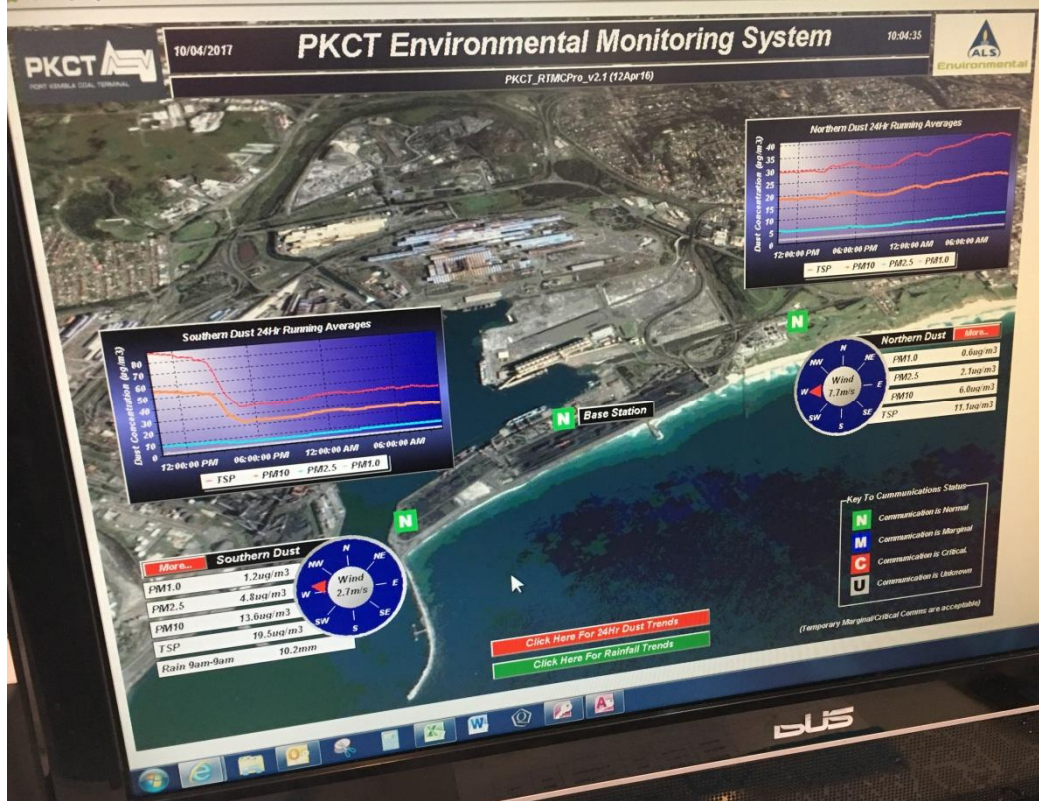
Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S2.C13	<p>Operation of Plant and Equipment</p> <p>The Proponent shall ensure that all plant and equipment used on site is:</p> <p>c) maintained in a proper and efficient condition; and</p> <p>d) operated in a proper and efficient manner.</p>	<ul style="list-style-type: none"> EPL 1625 Annual Return 2013 / 2014. EPL 1625 Annual Return 2014 / 2015. EPL 1625 Annual Return 2015 / 2016. Work Order S50804 – Water System, 30 January 2017. Work Order S51377 – Water System, 10 March 2017. Work Order S51393 – Water System, 6 March 2017. Work Order S51401 – Water System, 6 March 2017. Work Order S51418 – Water System, 6 March 2017. EPL Updates & Water Sampling Procedure Training, October 2014 (PowerPoint®). Meeting Invite – 28 October 2014. Email – Environmental Specialist, to Shift Teams, Water Sampling Procedures, 12 November 2014. PKCT Water Collection System, V10.3, 19 October 2012. 	<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"> 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. 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. <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>Non-compliant</p> <p>Low Risk</p>
DA 08_0009, S2.C14	<p>Dispute Resolution</p> <p>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.</p>	<ul style="list-style-type: none"> PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. 	<p>Site management reported that there had been no instances where agencies or council could not agree on specifications or requirements of the project approval.</p> <p>The 2013 / 2014, 2014 / 2015 and 2015 / 2016 AEMRs reported that "There were no disputes during the reporting period".</p>	<p>Not triggered</p>
DA 08_0009, S3.C1	<p>Noise</p> <p>Impact Assessment Criteria</p> <p>The Proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the criteria specified below for the location nearest to that residence.</p> <ul style="list-style-type: none"> Corner of Swan and Kembla Streets - Day: 51dB(A); Evening: 50dB(A); Night: 49dB(A) Corner of Swan and Corrimal Streets - Day: 51dB(A); Evening: 50dB(A); Night: 49dB(A) Corner of Keira and Fox Streets - Day: 55dB(A); Evening: 49dB(A); Night: 45dB(A) 	<ul style="list-style-type: none"> 07355-NM-9 Noise Monitoring July 2014 VerA_FINAL 07355-NM-10 Noise Monitoring December 2014 VerA_JM_Final Report 07355-NM-11 Noise Monitoring June 2015 VerA_JM 07355-NM-12 Noise Monitoring December 2015 VerA 07355-NM-13 Noise Monitoring_VerA_April 2016 13_160830 PKCT DPE Project Approval 08_0009 170316_AEMR amendments_signed letter 	<p>Bi-annual noise monitoring was undertaken by acoustic consultants, Wilkinson Murray. A review of the noise monitoring reports for the audit period indicated that no exceedences were recorded.</p> <p>PKCT submitted a request to the DP&E (by letter dated 30.08.16) that bi-annual noise monitoring be discontinued as noise levels were below the Noise Impact Criteria in all noise surveys undertaken since 2009. The DP&E accepted this request by letter dated 16.03.17.</p> <p>The last noise monitoring survey was completed in April in 2016.</p>	<p>Compliant</p>

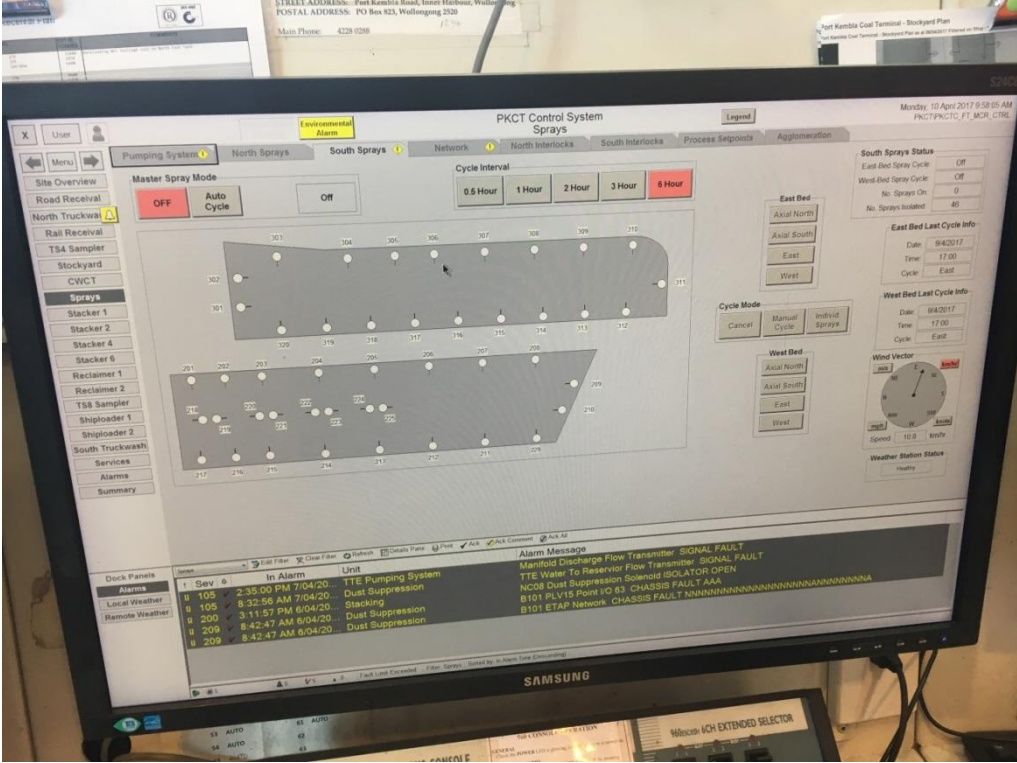
Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C2	<p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program 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"> - combination of attended and unattended noise monitoring measures; - noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval; and - reasonable and feasible best practice noise mitigation measures to ensure project specific noise criteria are met. 	<ul style="list-style-type: none"> • Noise Management Plan (Version: 8.0 • AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014 	<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&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><u>Implementation</u></p> <p>In general, it was considered that the NMP was being implemented. Refer also to S3.C3 below.</p>	<p>Preparation: Compliant</p> <p>REC-2017-09 - Revise the NMP with the following improvements:</p> <ul style="list-style-type: none"> • Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken. • 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 <p>Implementation: Compliant</p>


Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C3	<p>Continuous Improvement</p> <p>The Proponent shall:</p> <p>a) continue to implement all reasonable and feasible best practice noise mitigation measures;</p> <p>b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and</p> <p>c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director General.</p>	<ul style="list-style-type: none"> • Drivers Code of Conduct Implementation Plan • Drivers Code of Conduct Monthly Reports: <ul style="list-style-type: none"> - October 2014 - February 2015 - April 2015 - August 2015 - December 2015 v2 - January 2016 - April 2016 - May 2016 - August 2016 - February 2017 - March 2017 • Email response to resident RE Port Kembla Coal Terminal - Braking noise enquiry • PG TO record of discussion RE Port Kembla Coal Terminal - Braking noise • Wilkinson Murray letter report Re: Port Kembla Coal Terminal – Noise From Truck Movements (17 June 2016) 	<p>Noise mitigation measures outlined in the NMP include:</p> <ul style="list-style-type: none"> • Rail receipt enclosed within a shed. • Road and Rail Receipt conveyors initially underground then enclosed within conveyor galleries and transfer stations. • Truck driver rules and the Drivers Code of Code covering requirements relating to driver practices, in particular compression braking and speed control. • 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. <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 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 (L_{A1,1 min}). 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>Compliant</p> <p>OFI-2017-07 – 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>
DA 08_0009, S3.C4	<p>TRANSPORT</p> <p>Monitoring of Coal Transport</p> <p>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.</p>	<ul style="list-style-type: none"> • 2013 /2014 AEMR • 2014/ 2015 AEMR • 2015/ 2016 AEMR • 2013 /2014 Interim Environmental Management Report • 2014/ 2015 Interim Environmental Management Reports • 2015/ 2016 Interim Environmental Management Reports • Drivers Code of Conduct Monthly Reports for February 2015, April 2015, August 2015, January 2016, May 2016, August 2016, November 2016, February 2017 and March 2017. 	<p>PKCT receives monthly reports from each of the three transport companies summarising the tonnes of each product delivered on major arterial road (sighted examples). The Environmental Specialist combines the volumes to determine the total tonnes of coal and bulk products received at the site by public road.</p> <p>The volume of coal and bulk products was reported in Annual Environmental Management Reports and interim reports for the period of July 2013 to June 2016.</p>	<p>Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C5	<p>Traffic Management</p> <p>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.</p>	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Reports: October 2014, February 2015, April 2015, August 2015, December 2015, January 2016, May 2016, August 2016, November 2016, February 2017, March 2017 • DCC Internal Audits Worksheets <ul style="list-style-type: none"> ○ Trazblend – 21/02/2017 ○ Bohud – 14/02/2017 ○ Bulktrans – 16/02/20147 • Community Complaints Enquiries Register • Road User Group Meetings 	<p>This condition is monitored by PKCT and individual road transport operators. BHPBIC Heavy Haulage Induction indicates that queuing is permitted on Tom Thumb Road (noted this is a private road) and Port Kembla Rd, but also notes that queuing on Springhill Road is not permitted. Prohibition of queuing on Springhill Road is also included as criteria on the updated PKCT Critical Task Observation form.</p> <p>Audits were being undertaken by PKCT and transport operators as committed to in the Drivers Code of Conduct (DCC) Implementation Program. Of the examples sighted, no non-compliances with this criterion were noted.</p> <p>One complaint was received by PKCT in December 2014 (EV-0506) in relation to haulage trucks 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 that this complaint was related to use of designated roads rather than queuing on public roads whilst waiting to deliver coal, this was not considered to constitute a non-compliance with this condition.</p> <p>Since this time, no other complaints or incidents have been recorded by PKCT during the audit period.</p>	Compliant
DA 08_0009, S3.C6	<p>Driver's Code of Conduct</p> <p>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:</p> <p>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;</p> <p>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</p> <p>c) include measures to ensure the Driver's Code of Conduct is enforced.</p>	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • All Signed Commitment letters • Drivers Code of Conduct Monthly Reports: October 2014, February 2015, April 2015, August 2015, December 2015, January 2016, May 2016, August 2016, November 2016, February 2017, March 2017 • DCC Internal Audits Worksheets <ul style="list-style-type: none"> ○ Trazblend – 21/02/2017 ○ Bohud – 14/02/2017 ○ Bulktrans – 16/02/20147 • Road User Group Meetings • Sample PKCT Task Coach and Observation Sheets 	<p>The previous IEA (AECOM, 2014) assessed that the requirements of the DCC Implementation Program were met and that the program was to the satisfaction of the Director-General.</p> <p>The principal road transport companies and affected mines (South 32's Illawarra Coal (formerly BHP Billiton), Wollongong Coal (formerly Gujarat NRE Minerals Limited), Bluescope Steel, Illawarra Coke Company, Australian Steel Mill Services, Bulktrans Pty Ltd, Bohud Transport Pty Ltd, Lode Haul, Trazblend and Hornby Transport Services) are signatories to the DCC.</p> <p>DCC Implementation Program adequately covers information regarding the Driver Induction Program and Management (refer Section 4.4). This refers to the transport providers to induct all drivers in accordance with the DCC. Internal Audit worksheets sighted by the auditors for transport operators (Bulktrans, Bohud, Trazblend) details compliance with induction requirements of the DCC Implementation Program. Observation and discussions by the audit team with a random selection of drivers (Bulktrans, Trazblend) indicated driver's awareness and understanding of the DCC. Post discussion investigations and toolbox talks records sighted confirmed that drivers had been inducted into DCC requirements.</p> <p>PKCT conducts frequent audits of road transport providers compliance with the DCC, as per the management process outlined in the DCC Implementation Program. Audits are undertaken using the updated CTO form.</p> <p>PKCT also conducts annual audits of transport operators to assess their compliance with enforcing the DCC. It is noted that the internal audit form used by PKCT to audit transport providers is very comprehensive to both questions posed to operators, and answers provided on the form, demonstrating that PKCT is effectively ensuring that transport providers using PKCT are enforcing the DCC.</p> <p>In turn, both shipping companies and individual road transport operators conduct frequent audits of their own drivers/subcontractors to ensure the DCC is enforced. Bulktrans in particular, the largest road transport operator, conducts a rigorous auditing program, with 'road runners' being required to conduct at least one audit each shift, with two shifts occurring per day.</p> <p>PKCT collects this data from operators on a monthly basis and compiles all audit data in a master tracking spreadsheet, sighted on the day of the audit. PKCT and transport operators are exceeding the number of audits required (50 recorded observations by transport operators and 25 CTOs by PKCT).</p> <p>In instances of non-compliance, transport operators implement own disciplinary processes which are outlined in their own DCCs to which drivers are also held accountable. Trazblend, Bohud and</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation																							
			Bulktrans all implement a "3 Strike" policy for enforcing beaches of the DCC. This is consistent with the 3-strike policy documented within the DCC Implementation Program (section 4.5.4). PKCT annual audits of transport operators was sighted which confirm that the enforcement policies are being implemented to ensure that transport operators are monitoring for compliance with the DCC																								
DA 08_0009, S3.C7	<p>AIR Quality Impact Assessment Criteria</p> <p>The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed below at any residence.</p> <p><i>Table 3: Long term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>Annual</td> <td>30 µg/m³</td> </tr> </tbody> </table> <p><i>Table 4: Short term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>24 hour</td> <td>50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 5: Long term impact assessment criteria for deposited dust</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Max Increase in DD Level</th> <th>Max Total DD Level</th> </tr> </thead> <tbody> <tr> <td>Deposited Dust</td> <td>Annual</td> <td>2 g/m²/month</td> <td>4 g/m²/month</td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m ³	Particulate matter < 10 µm (PM10)	Annual	30 µg/m ³	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM10)	24 hour	50 µg/m ³	Pollutant	Averaging Period	Max Increase in DD Level	Max Total DD Level	Deposited Dust	Annual	2 g/m ² /month	4 g/m ² /month	<ul style="list-style-type: none"> Dust monitoring spreadsheet 2014 / 2015 Annual Return 2015 / 2016 Annual Return EPL 1624 Monthly Report April 2017 EPL 1624 Monthly Report December 2016 PKCT Annual Air Quality Monitoring Report 2013-2014 (Katestone September 2014) AEMR Documents (2013 / 2014, 2014 / 2015 and 2015 / 2016) Interim Environmental Reports 2014-2016 	<p>Site has an adequate dust monitoring program on site which monitors on-site and off-site dust concentrations. Wind direction and wind speed were also used to attribute measured dust concentrations to the PKCT facility.</p> <p>Dust monitoring was undertaken using dust deposition gauges spread around the boundary of the site and at off-site locations and through the monitoring of different dust fraction concentrations using an Osiris monitor. Results are obtained and handled as follows:</p> <ul style="list-style-type: none"> Dust deposition gauge (DDG) data is obtained monthly from an external consultant and is entered into a central database maintained by PKCT. This database highlights any concentrations above the site criteria. 24 hour dust concentrations are recorded in the same dust monitoring spreadsheet used for the DDG data. Daily average data is stored for PM10 and TSP along with comments on the observed meteorology on days with elevated dust concentrations. Results from the PKCT facility are reported in a range of documents including: <ul style="list-style-type: none"> Interim environmental monitoring reports Annual environmental monitoring reports Annual returns EPL 1624 Monthly Environmental Monitoring Reports. <p>Results were cross-referenced between the monitoring database and those reported in the AEMR. Results were consistent between the document and the monitoring database.</p> <ul style="list-style-type: none"> Calibration of the dust concentration monitoring equipment (OSIRIS) and the compliance of the DDG's was examined and the following observed: <ul style="list-style-type: none"> Dust gauges were positioned correctly and were observed to have correct bottles and funnels in the gauges. The DDG's were in good condition. Osiris monitors were observed to be in good condition and the inlets free of obstruction or debris such as accumulated dust or insect nests. Current calibration certificates for the North and South monitors were observed. <p>There have been a small number of particulate matter exceedances measured by the OSIRIS monitors over period of the audit). These concentrations do not technically constitute an exceedance of the NSW EPA criteria as the OSIRIS monitors are used as an indicator of dust concentration for operational control rather than for the demonstration of compliance with NSW EPA criteria. Despite this technicality in relation to the use of the OSIRIS data, PKCT has undertaken reasonable steps to attempt to determine its contribution to the local air quality through monitoring both on and off-site and using wind direction, wind strength and particle size to evaluate their contribution to the recorded result. Where a result was identified as being elevated, an analysis of the proportion of the wind and dust concentration blowing from PKCT was determined and a relative contribution calculated. Based on findings of these studies, the recorded concentrations above the criteria were considered to be unlikely to be solely due to the PKCT operations and when the relative concentration from PKCT is considered, the concentrations from PKCT's operations were found to comply with the criteria. This procedure is in line with procedures used elsewhere within NSW for the management and assessment of dust emissions from large industrial sites handling coal and also with PKCT's approved Air Quality Management Plan.</p> <p>The criteria listed opposite were consistently applied across all database tabulation and data reporting. Trigger values have been used to enable the identification of concentrations or deposition values above approved levels (PM10 of 50µg/m³ and Deposited Dust of 2 and 4g/m²/month).</p>	Compliant
Pollutant	Averaging Period	Criterion																									
Total suspended particulate (TSP) matter	Annual	90 µg/m ³																									
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Deposited Dust	Annual	2 g/m ² /month	4 g/m ² /month																								

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C8	<p>Operations</p> <p>The Proponent shall:</p> <ol style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Meteorological monitoring is operational and is displayed on the PKCT Environmental Monitoring System in the control room. Environmental monitoring undertaken via DDG and continuous monitoring system in place as per AQMP Dust generation of elevated wind conditions either trigger automatic water sprays (high winds) or sprays can be manually triggered if observed dust generation occurs. 	<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> <ul style="list-style-type: none"> 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. Meteorology from the on-site meteorological station is displayed in the control room via an alert screen (see below)  <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 records of activations is shown below.</p>	<p>Compliant</p> <p>OFI-2017-08 - Consider modifying the display to align the north on the maps with north on the displays.</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
			 <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> <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.C9</p>	<p>During carrying out of the project, the Proponent shall ensure that:</p> <ol style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Site observations 	<p>All trucks are observed on the control room TV screens with cameras mounted at main boom gate and unloading areas.</p> <p>The truck wash was observed to be in operation on the day of the audit. All trucks observed passed through the truck wash before entering the public road network.</p>	<p>Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
			 <p>Visual assessment of the trucks entering the site with their covers on, the queue of trucks inside the site where covers are removed and the unloading point can be undertaken in the control room as shown above.</p> <p>Refer also to DA 08_0009 S3.C6 and assessment of compliance with the Drivers Code of Conduct.</p>	
<p>DA 08_0009, S3.C10</p>	<p>Air Quality Monitoring Program</p> <p>The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Air Quality Management Plan Version 10.0, 6 July /2012. Site observations 	<p><u>Preparation</u></p> <p>The previous IEA (AECOM, 2014) assessed that the requirements of the AQMP including consultation with the EPA were met.</p> <p>The AQMP was last revised on 16 January 2014 (Version 10). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the AQMP.</p> <p><u>Implementation</u></p> <p>In general, the AQMP was considered to have been implemented across the site. Including:</p> <ul style="list-style-type: none"> Real time monitoring was being undertaken as discussed under DA 08_0009, S3.C8. Water sprays were highly visible on the coal storage area, roadways and unloading areas. The site housekeeping was very good with no major areas of coal spillage or overflow visible. In particular the points that had been identified as an area of concern in 2015/2016 AEMR (e.g. conveyor carryover on the port loading area) was clean and almost completely clear of coal carryover. The roadways were neat and clean. Although there were low wind conditions on the day of the audit, a water cart was observed filling up for road maintenance. <p>Since the 2014 Audit, additional security measures have been installed around the off-site dust gauges to prevent vandalism of the bottles and gauges stands.</p>	<p>Preparation: Compliant Implementation: Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 0811_009, S3.C11	Meteorological Monitoring 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.	<ul style="list-style-type: none"> • Site observation of meteorological sites • Site observations of control room system • Wind data spreadsheet <ul style="list-style-type: none"> ○ 	<p>PKCT operates two continuous meteorological monitoring sites at the northern and southern part of the site. Meteorological data was available for the site and was observed via the control room system and PKCT environmental monitoring system. The stations are considered to “generally comply” with EPA’s Approved Methods.</p> <p>In addition to the site meteorological stations, the PKCT utilises meteorology forecasts from Bureau of Meteorology stations located to the south of the terminal (direction of winds that have the potential to result in elevated dust concentrations at nearest residences).</p>	Compliant
DA 08_0009, S3.C12	SURFACE WATER Discharge Limits 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>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>	Non-Compliant Medium Risk
DA 08_0009, S3.C13	Water Management Plan 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: i. stormwater effluent discharge criteria; ii. a monitoring protocol for evaluating Compliant with the stormwater effluent discharge criteria; and iii. reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met.	<ul style="list-style-type: none"> • Water Management Plan, Version 8, 3 November 2016. • AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014 • Recycled Water Quality Management Plan, Version 4, 18 August 2015 • Restoration and Compliance Project Environmental Management Plan for Port Kembla Coal Terminal (Stefanutti, July 2016) 	<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 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"> • Water quality monitoring was being undertaken (refer assessment EPL L2.1 and M2.3) • Collection ponds were being maintained (refer O4.2) • The water collection system was computer controlled by the Main Control Room • Incidents were being recorded in PKCT’s Event Management System (EMS) <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>Preparation: Compliant</p> <p>REC-2017-13 – 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>REC-2017-14 Update the WMP with the following improvements:</p> <ul style="list-style-type: none"> • Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements. • Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625. • Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16. <p>Implementation: Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C14	<p>BIODIVERSITY</p> <p>Green and Golden Bell Frog Management Plan</p> <p>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:</p> <p>a) be developed in consultation with DECC; and</p> <p>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.</p>	<ul style="list-style-type: none"> Green and Golden Bell Frog Management Plan, MP.HS.109, V8, 2 November 2016. AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014 PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Niche Environment & Heritage, 2016, PKCT Green and Golden Bell Frog Survey Fauna Monitoring Report, Executive Summary. Email: EPA, 2016, PKCT DPE Project Approval – Green and Golden Bell Frog Management, From EPA to OEH, Sent: Thursday 6 October 2016 at 4:03pm Email: OEH, 2016, PKCT DPE Project Approval – Green and Golden Bell Frog Management, From OEH to EPA, Sent: Monday 17 October at 2:08pm. 	<p><u>Preparation</u></p> <p>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 GGBF Management Plan 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>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the GGBF.</p> <p><u>Implementation</u></p> <p>Niche Environment & Heritage Pty Ltd conducted a diurnal and nocturnal survey of ponds at PKCT on 15 February 2016 as part of the on-going monitoring required by the GGBF management Plan. Niche (2016) reported that “No Green and Golden Bell Frogs or tadpoles were located during either the diurnal or nocturnal survey. Only one species of frog was located in the ponds on the Terminal, being the Persons Tree Frog. The Striped Marsh Frog was recorded at Greenhouse Park. The ongoing absence of records from the terminal facility and Greenhouse Park since 2011 indicates that the Green and Golden Bell Frog is no longer present on site. It is advised that Port Kembla Coal Terminal liaise with OEH to determine if the annual monitoring program needs to be continued and, if not, under what circumstances monitoring surveys should be undertaken”.</p> <p>The 2015 AEMR (p.64) notes that a Green and Golden Bell Frog survey was undertaken on 3 February 2015 by “specialist consultants” and that no frogs were identified.</p> <p>The 2014 AEMR (p.40) notes that a Green and Golden Bell Frog survey during evening and night-time was undertaken on 27 February 2014 by Niche Environment and Heritage Pty Ltd and that no frogs were identified on-site.</p> <p>It is noted that Site management communicated Niche’s rationale to the EPA who forwarded the issue to the local OEH officer by email on 6 October 2016. The OEH officer replied by email to the EPA and PKCT on 17 October 2016 and recommended that Green and Golden Bell Frog monitoring continue on an annual basis, noting that “The level of monitoring is not considered onerous and with the low level of monitoring it is possible that the species is persisting at these sites. In addition the nature of GGBF populations which can rapidly expand and retract from season to season means that even if it is currently unoccupied it may be re-occupied in the future”. Given the advice provided by OEH concerning ongoing monitoring AECOM concur that the annual surveys continue to be implemented.</p> <p>In general it was considered that the GGBF management plan 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>Preparation: Compliant</p> <p>Implementation: Compliant</p>
DA 08_0009, S3.C15	<p>VISUAL AMENITY</p> <p>Lighting Emissions</p> <p>The Proponent shall:</p> <p>a) ensure no external lights shine above the horizontal;</p> <p>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</p> <p>c) take all reasonable and feasible measures to mitigate off-site lighting impacts from the project to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Community Complaints Enquiry Register 2013 – 2016. 	<p>The previous IEA (AECOM, 2014, p.a-5) stated that “Lightpoint Consulting Services assessed site lighting and site is compliant with AS4282”.</p> <p>The 2016 AEMR reported that “PKCT is currently undertaking a major restoration and compliance project on site. As part of the project, all new lighting will be assessed and will comply 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” (AEMR, 2016, p.42). At the time of the audit, this project was yet to be completed.</p> <p>A review of the Community Complaints Enquiry register for the audit period indicated that there had not been any complaints received relating to off-site lighting impacts. The 2016 AEMR reported that there had not been any community complaints related to lighting since PKCT commenced operations in 1990.</p>	<p>Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C16	<p>Landscape Management Plan</p> <p>The Proponent shall prepare and implement a Landscape Management Plan to the satisfaction of the Director-General. This Plan must:</p> <ul style="list-style-type: none"> · be submitted to the Director-General for approval within 12 months of this approval, or as otherwise agreed by the Director-General; and · include; <ul style="list-style-type: none"> - details of screening trees to be planted on the road receival earth bund and along the northern site boundary; and - an implementation program. 	<ul style="list-style-type: none"> · Landscape Management Plan MP.HS.470, 11 November 2016. · AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014, Job No.: 60316484. · Notification of Weed Spraying - Johnsons Landscapes, 3 March 2015. · Notification of Weed Spraying - Johnsons Landscapes, 17 May 2016. · Site Observations. 	<p><u>Preparation</u></p> <p>The previous IEA (AECOM, 2014) assessed that the requirements of the LMP were met.</p> <p>The LMP was last revised on 11 November 2016 (Version 10). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the LMP.</p> <p><u>Implementation</u></p> <p>The revised plan stated that the following work was proposed for the next reporting period:</p> <ul style="list-style-type: none"> · Complete Central Pond Upgrade. · Complete BPB Demolition (removing redundant structure) and Site Works - remediate as needed. · Review road receival proposal (Stage 3) with consideration to project objectives and other associated aspects i.e. dust control, noise mitigation. Consider the adequacy of current scope and assess against other options. · Continue Landscaping Contract. <p>At the time of the audit site inspection, the Central Pond Upgrade project had been completed. As part of this project, some trees were removed and a new area of native shrubs planted at the surrounds to the ponds.</p> <p>PKCT utilises a landscaping contractor to maintain lawns and gardens and control weeds on site. Notification of weed spraying was observed for 3 March 2015 and 17 May 2016.</p> <p>The previously landscaped northern transfer station was observed to now be well established (refer photos in main report)</p> <p>In general it was considered that the LMP 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>Preparation: Compliant</p> <p>Implementation: Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C17	<p>GREENHOUSE GAS EFFICIENCY PLAN Operating Conditions</p> <p>The Proponent shall implement all reasonable and feasible measures to minimise:</p> <p>a) energy use on site; and</p> <p>b) greenhouse gas emissions from the project to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> • Greenhouse Gas and Energy Efficiency Management Plan, Version 9, December 2016. • PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. • DP& E Letter dated 23.08.16 approving 2015 / 2016 AEMR. 	<p>PKCT has developed a Greenhouse Gas and Energy Efficiency (GHG&EE) Management Plan which includes as an objective to:</p> <ul style="list-style-type: none"> • Outline the processes in place for the identification and implementation of reasonable and feasible measures to minimise energy (electricity) use and GHG emissions.- <p>The GHG&EE Management Plan was approved by the Director General in the previous audit period. A discussion of the energy efficiency activities undertaken during each reporting period was included in the AEMRs which were provided to the DP&E.</p> <p>The 2015 / 2016 AEMR reported that the following energy efficiency activities were undertaken during the reporting period:</p> <ul style="list-style-type: none"> • Continued the progressive replacement of older lighting systems to energy efficient LED lights. At the end of the reporting period, PKCT's electrical team had upgraded lighting in TS1, NC2, TS2 top floor, TS3, NC5 and some areas of road lighting equating to a 50% energy saving. <p>The DP&E stated that the 2015 / 2016 AEMR was to its satisfaction via letter dated 23.08.16</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
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 and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:</p> <p>a) be prepared generally in accordance with the Guidelines for Energy Savings Action Plans (DEUS 2005, or its latest version);</p> <p>b) be submitted to the Director-General for approval;</p> <p>c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;</p> <p>d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;</p> <p>e) describe how the performance of these measures would be monitored over time; and</p> <p>f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461, 14 December 2016. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. AECOM, 2014, Port Kembla Coal Terminal, 2014 Independent Environmental Audit, 5 June 2014. Letter from P&E to PKCT confirming approval of GGEEMP, 27 October 2011. ESAP annual report 2014-15 Email from OEH dated 08.08.14 re ESAP 	<p><u>Preparation</u></p> <p>The previous IEA (AECOM, 2014) assessed that the requirements of the GHG&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>The previous IEA (AECOM, 2014, p.a-6) recommended that the GHG&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&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>The 2014/2015 AEMR (p.48) notes that "Reportable energy consumption and greenhouse gas emissions have slightly increased at PKCT this reporting period".</p> <p>The 2015/2016 AEMR (p.46) states that "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".</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&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>Preparation: Compliant</p> <p>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.</p> <p>REC-2017-16- Revise the GHG&EE Management Plan with the following improvements:</p> <ul style="list-style-type: none"> Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered. Update the GHG&EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used. Include further details within the GHG&EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured. <p>Implementation: Compliant</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S3.C19	<p>WASTE</p> <p>Operating Conditions</p> <p>The Proponent shall:</p> <p>a) monitor the amount of waste generated by the project;</p> <p>b) investigate ways to minimise waste generated by the project;</p> <p>c) implement reasonable and feasible measures to minimise waste generated by the project; and</p> <p>d) report on waste management and minimisation in the AEMR to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> Waste Management Plan MP.HS.460. 12 August 2015. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Waste Tracking Project, July 2015 to June 2016.xlsx. Veolia, T&C Services Pty Ltd, PKCT Waste Contract Monthly Report, June 2014, November 2014, May 2015, September 2015, January 2016, April 2016 to December 2016. NSW EPA Online Waste Tracking System Transport Certificate – No. 2T00759039. Start 1 July 2016 – End 30 June 2017. PKCT Newsletter Third edition (6 February 2015). 	<p>PKCT has developed a Waste Management Plan which outlines the requirements of this condition.</p> <p>a) 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. Waste generated from specific projects is also tracked. The Environmental Specialist collates and reports on waste generation and trends as part of the AEMR.</p> <p>The auditors sighted the tracking spread sheet for waste for Projects for July 2015 to June 2016 as well as examples of the monthly reports provided by Veolia for the audit period.</p> <p>b) & c) The Waste Management Plan (p.16) notes that "PKCT will investigate opportunities for ongoing waste minimisation through discussion with employees involved in activities that generate waste. PKCT Management has a responsibility under this Plan to review these opportunities to ensure the progression of suitable schemes".</p> <p>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 as follows:</p> <ol style="list-style-type: none"> reuse on site or reprocess e.g. screen spillage coal offsite disposal for recycling or reuse e.g. waste oil, scrap steel as a last resort, offsite disposal e.g. rubbish to council land fill. <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>PKCT implements processes to recover spillage coal. The 2015 / 2016 AEMR reported that 35,787 tonnes of spillage coal was returned to customers as part of spillage screening and recycling activities during the reporting period.</p> <p>As part of the upgrade of the Stockyard Rails project, PKCT implemented a number of waste minimisation and reuse initiatives (as outlined in the 2015 / 2016 AEMR) including:</p> <ul style="list-style-type: none"> excavating existing ballast, screening it through a mobile screening plant and then washing it to remove coal. Screened ballast was reused where it met specifications Undersize and oversize screened material was stockpiled separately for further processing and reuse within the temporary roads. Existing rail and sleepers were salvaged and reused <p>The February 2015 Newsletter included an article on waste management including the types of wastes separated and recycled at PKCT.</p> <p>d) The AEMRs for the reporting period (2013/2014, 2014/2015 and 2015/2016) discussed waste under Section 9.9 and included an annual summary of waste generated as well as a discussion of trends and waste minimisation activities undertaken during the reporting period and planned for the next reporting period.</p>	Compliant
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>	<ul style="list-style-type: none"> PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Acknowledgement of Notification of Hazardous Chemicals on Premise from SafeWork NSW, 29.08.16 Environmental Task Observation: Workshop and Store Areas completed forms dated 5.08.14; 26.02.15; 13.08.15; 	<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 & 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 separately from oxidisers. The product</p>	<p>Compliant</p> <p>OFI-2017-09 – Investigate the option of providing secondary containment for the flocculent Coreshell 71303 tank to offer additional protection from accidental release to the harbour</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
		<p>23.03.16 and 17.11.16.</p> <ul style="list-style-type: none"> EMS Screen shot showing list of Critical Task Observations: Workshop and Store Area. Priority Group Dangerous Goods Storage and Handling: Compliance Report 09.02.16. Site observations. 	<p>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"> 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. 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. 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. PKCT continues to utilise a mobile refuelling system for its plant machinery and does not store any fuel on site. The auditors confirmed this was still the case. 	
DA 08_0009, S3.C21	<p>Fire Control</p> <p>During the project, the Proponent shall:</p> <p>a) ensure that it maintains suitable equipment to respond to any fires on site; and</p> <p>b) assist the fire and emergency services as much as possible if there is a fire on site.</p>	<ul style="list-style-type: none"> Fire Management Plan, MP.HS.459, V6, 22 February 2017. Site Observations. PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. Wormald, PKCT Washdown & Fire Protection Fire Detection Layout Diagram, PKNCL1-WF-S@-0001, Rev6, 25 July 2016. NSW Fire & Rescue Lodgement of Emergency Plan, 24 October 2016. PKCT Emergency Services Information Package "C" Manifest: Fire Detection and Suppression – Inergen Details. PKCT, Emergency Management Plan, V13.0, Doc ID:79, MP.HS.79, 24 October 2016. 	<p>PKCT has developed a Fire Management Plan (2017).</p> <p>During the Site inspection the following fire control equipment was observed: fire detection and alarming; fire suppression- sprinklers, fire extinguishers, gas flooding, portable fire extinguishers and fire hose reels. The Fire Management Plan (p.13) listed the following fire management procedures:</p> <ul style="list-style-type: none"> Fire System Isolations PR.HS.104. Action when fire is spotted PR.HS.9. Use of Fire Extinguishers PR.HS.305. <p>PKCT had three fires during the 2013 / 2014 AEMR reporting period. None of these were during the audit period (all in 2013).</p> <p>PKCT had one minor fire and a smouldering roller across the 2014 / 2015 AEMR reporting period. On 12 November 2014 a collapsed roller on roller ST4 trailer was found to be smouldering with the potential to catch on fire. Coal was run off the belts and the roller was changed. On 2 February 2015 a collapsed pulley bearing on conveyor 9 overheated and caught fire. Site management reported the belt was stopped and the fire extinguished by use of a fire hose.</p> <p>PKCT had one fire incident during the 2015 / 2016 reporting period when used welding kits were placed in a waste bin that contained cardboard on 2 February 2016. The cardboard ignited but was extinguished with a fire hose.</p> <p>The above referenced incidents were logged within PKCT's incident reporting database.</p> <p>All of the above fires were small and were extinguished by personnel on site with PKCT fire hoses and without the requirement to involve fire and emergency services.</p> <p>Site management reported that they would assist fire and emergency services as much as possible if there is a fire on site.</p> <p>The AECOM Auditors are not fire management specialists and no adequacy assessment of the fire control systems at PKCT has been conducted, nor any other assessment related to fire management.</p>	Compliant
DA 08_0009, S3.C22	The Proponent shall ensure that it maintains a Fire Management Plan for the site.	<ul style="list-style-type: none"> Fire Management Plan, MP.HS.459, V6, 22 February 2017. 	Refer to DA 08_0009, S3.C21.	Compliant
DA 08_0009, S4.C1	ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING	<ul style="list-style-type: none"> Environmental Management Strategy Version 9 (15.10.15) 	<p><u>Preparation</u></p> <p>PKCT prepared an Environmental Management Strategy which was submitted to the DP&E by letter</p>	Preparation: Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
	<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"> - keep the local community and relevant agencies informed about the operation and environmental performance of the project; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the course of the project; - respond to any non-Compliant; - manage cumulative impacts; and - respond to emergencies; <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>	<ul style="list-style-type: none"> • Environmental Task Observation: Workshop and Store Areas completed forms dated 5.08.14; 26.02.15; 13.08.15; 23.03.16 and 17.11.16. • Environmental Task Observation: Berth Areas, Ship – Dust, Dirty Water Discharge & Spillage Control completed form dated 23.01.17. • Environmental Task Observation: Main Control Room completed form dated 16.02.17. • Incident Investigation and Reporting procedure (PR.HS.124) • Environmental Aspects and Impacts Register.xls. • Internal Audit Program 2016-2018.xlsx. • Extract of PKCT EMS from 1.04.14 10.04.17. • ISO 14001:2004 Surveillance Audit, Loyd’s Register LRQA, 19 & 20 October 2016. 	<p>dated 29.07.10. Formal approval of the Strategy from the DP&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 Loyd’s Register LRQA on the 19 & 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&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 & 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 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"> • Minor – PKCT internal, routine via EMS • Minor - PKCT internal, manager contacted • Not material – EPA notification may be required • Material – EPA notification required <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>REC-2017-12 - Revise the Environmental Management Strategy with the following improvements:</p> <ul style="list-style-type: none"> • Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation. • 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 • 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. <p>Implementation: Compliant</p> <p>OFI-2017-01: Include a field in EMS for recording whether events have been notified to the EPA and other relevant agencies</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S4.C2	<p>REPORTING</p> <p>Incident Reporting</p> <p>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>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.</p> <p>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.</p>	<p>Non-compliant</p> <p>Low risk</p> <p>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 (in addition to the EPA) within 24 hours.</p>
DA 08_0009, S4.C3	<p>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> <p>a) describes the date, time, and nature of the incident;</p> <p>b) identifies the cause (or likely cause) of the incident;</p> <p>c) describes what action has been taken to date; and</p> <p>d) describes the proposed measures to address the incident.</p>		<p>Not triggered as DP&E was not notified of incidents (refer DA 08_0009, S4.C2). The EPA was notified as required by EPL 1625 (refer R3.1).</p>	<p>Not triggered</p>
DA 08_0009, S4.C4	<p>Annual Reporting</p> <p>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:</p> <p>(a) identify the standards and performance measures that apply to project;</p> <p>(b) describe the works carried out 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"> - impact assessment criteria/limits; - monitoring results from previous years; and - predictions in the EA or other documents listed in condition 2 of schedule 2; <p>(g) identify and discuss all exceedences of approval and licence conditions and other applicable standards and performance measures;</p> <p>(h) identify any trends in the monitoring results over the life of the project;</p> <p>(i) identify any non-Compliant during the previous year; and</p> <p>(j) describe what actions were, or are being, taken to ensure Compliant.</p>	<ul style="list-style-type: none"> • PKCT, 2014, Interim AEMR, 1 July 2013 to 31 December 2013. • PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. • PKCT, 2015, Interim AEMR, 1 July 2014 to 31 December 2014. • PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. • PKCT, 2015, Interim AEMR, 1 July 2015 to 31 December 2015. • PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. • Letter from DP&E dated 25.03.14 re feedback on 2014 / 2014 AEMR. • Letter from DP&E dated 12.08.14 re feedback on 2014 / 2015 AEMR • Letter from DP&E dated 23.08.16 re feedback on 2015 / 2016 AEMR 	<p>Annual Environmental Management Reports (AEMRs) and Interim AEMRs were available for the periods 2013 / 2014, 2014 / 2015, 2015 / 2016.</p> <p>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:</p> <ul style="list-style-type: none"> • Comparison of the monitoring results for noise and air quality with the results from the previous years; and • Identify any trends in noise, air quality and waste monitoring. <p>A letter from the DP&E dated 12.08.14 stated that the 2014 / 2015 AEMR generally satisfies 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&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</i> (2015).</p> <p>The letter requested that the next AEMR be updated to include:</p> <ul style="list-style-type: none"> • A map showing the regional context • A summary of any community engagement activities and community contributions undertaken during the reporting period • Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis. 	<p>Compliant</p> <p>OFI-2017-10 - Ensure that future AEMRs include:</p> <ul style="list-style-type: none"> • A map showing the regional context • A summary of any community engagement activities and community contributions undertaken during the reporting period • Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis.

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S4.C5	<p>INDEPENDENT ENVIRONMENTAL AUDIT</p> <p>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:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(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</p> <p>(d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate,</p> <p>(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> DP&E letter dated 02.03.17 approving audit team. 	<p>Independent environmental audits were conducted by AECOM in 2011 and 2014. This is the third IEA of the PKCT and was commissioned by 31 March 2017.</p> <p>a) The audit team which includes experts in the fields of noise, air quality and traffic was approved by the DP&E by letter dated 2.03.17.</p> <p>b) The IEA included consultation with the DP&E, EPA, OEH and CCC (refer to Section 4.0 of main report)</p> <p>c) This Compliance Matrix documents the review compliance with the requirements of the Project Approval and EPL. Refer also to Section 5.0 of the main report.</p> <p>d) A review of the adequacy of strategies and plans / programs is provided in Section 9.0 of the main report.</p> <p>e) Recommendations for improvement are provided in this Compliance Matrix and in the main report and are summarised in Section 10.0 of the main report.</p> <p>The audit team consisted of a lead auditor, air quality specialist, noise management specialist and traffic management specialist.</p>	Compliant
DA 08_0009, S4.C6	<p>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.</p>	<ul style="list-style-type: none"> Email to DP&E attaching 2014 IEA and letter response dated 9.05.14 Email to DP&E attaching revised 2014 IEA and revised PKCT Audit Action Plan. 	<p>The 2014 IEA together with PKCT's formal response to the recommendations made in the report was submitted to the DP&E by letter dated 9.05.14 (within 6 weeks of completion of the audit).</p> <p>The DPE provided feedback to the IEA via emails dated 29.05.14 and 16.06.14 (not sighted) seeking clarification and the IEA and PKCT's Audit Action Plan were revised. The revised IEA and Action Plan were provided to the DPE via email dated 23.06.14.</p>	Compliant
DA 08_0009, S4.C7	<p>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>		<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&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&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&E for approval.</p>	<p>Not verified</p> <p>REC-2017-07 – 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.</p>

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliant Status & Recommendation
DA 08_0009, S4.C8	<p>ACCESS TO INFORMATION</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>(d) provide a copy of the relevant document/s to the relevant agencies;</p> <p>(e) place a copy of the document/s on its website; and</p> <p>(f) remove superseded copies of strategies/plans/programs from its website.</p>	<ul style="list-style-type: none"> • http://www.pkct.com.au/community-and-environment/ • http://www.pkct.com.au/news/ • Email to DP&E dated 30.07.14 re 2013 / 2014 AEMR. • Email to Wollongong City Council dated 15.08.14 re 2013 / 2014 AEMR. • Email to EPA dated 15.08.14 re 2013 / 2014 AEMR. • Email to DP&E dated 28.07.15 re 2014 / 2015 AEMR. • Email to DP&E dated 28.07.16 re 2015 / 2016 AEMR. • Email to Wollongong City Council dated 15.03.17 re 2014 / 2015 and 2015 / 2016 AEMRs. • Email to EPA dated 15.03.17 re 2014 / 2015 and 2015 / 2016 AEMRs. • Email to DP&E dated 9.05.14 re 2014 IEA. 	<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&E that relevant agencies include the EPA and Wollongong Council.</p> <p>The 2013 / 2014 AEMR was provided to the DP&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&E by email dated 28.07.15</p> <p>The 2015 / 2016 AEMR was provided to the DP&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 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>Non-compliant</p> <p>Low Risk</p> <p>REC-2017-02 - Ensure the website includes the most recent revisions of the Environmental Management Strategy and management plans.</p> <p>REC-2017-03 - Ensure the IEAs are published on the website</p> <p>OFI-2017-04 –Consider changing the layout of the website to make it easier to navigate to the environmental management plans, monitoring reports, AEMRs and IEAs.</p>
DA 08_0009, S4.C9	<p>During the project, the Proponent shall:</p> <p>(a) make a summary of monitoring results required under this approval publicly available on its website; and</p> <p>(b) update these results on a regular basis (at least every 6 months).</p>	<ul style="list-style-type: none"> • PKCT, 2014, Interim AEMR, 1 July 2013 to 31 December 2013. • PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. • PKCT, 2015, Interim AEMR, 1 July 2014 to 31 December 2014. • PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. • PKCT, 2015, Interim AEMR, 1 July 2015 to 31 December 2015. • PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. • PKCT letter to DP&E dated 30.08.16 • DP&E letter dated 16.03.17 – Amendments to monitoring surveying and reporting • http://www.pkct.com.au/news/ 	<p>To meet the requirements of this condition, PKCT was preparing an "Interim Environmental Management Report" midway through the AEMR reporting period to provide the public with a summary of its monitoring results on a six monthly basis.</p> <p>Interim Environmental Management Reports were available on PKCT's website under the 'News' page for July-December 2015 and July to December 2014. The 2013 / 2014, 2014 / 2015 and 2015 / 2016 AEMRs were also available under the 'News' page of the website. In addition PKCT prepares a summary of EPL monitoring data on a monthly basis which was available on its website as required under its EPL.</p> <p>PKCT sought approval from the DP&E by letter dated 30.08.16 to discontinue the preparation of the Interim Environmental Monitoring Report as the AEMR reporting together with the EPL reporting was considered to provide adequate information to the public. The DP&E accepted this request by letter dated 16.03.17.</p>	<p>Compliant</p>

Table 2: Environmental Protection Licence 1625

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation									
EPL 1625, A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Coal Works</td> <td>Coal Works</td> <td>>5,000,000 T annual handling capacity</td> </tr> <tr> <td>Shipping in Bulk</td> <td>Shipping in Bulk</td> <td>>500,000 T of annual capacity to load and unload</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Coal Works	Coal Works	>5,000,000 T annual handling capacity	Shipping in Bulk	Shipping in Bulk	>500,000 T of annual capacity to load and unload	<ul style="list-style-type: none"> PKCT, 2014, AEMR, 1 July 2013 to 30 June 2014. PKCT, 2015, AEMR, 1 July 2014 to 30 June 2015. PKCT, 2016, AEMR, 1 July 2015 to 30 June 2016. PKCT Monthly Operational Report January 2017 Drivers Code of Conduct Monthly Reports for February 2015, April 2015, August 2015, January 2016, May 2016, August 2016, November 2016, February 2017 and March 2017. 	<p>PKCT receives monthly reports from each of the three transport companies summarising the tonnes of each product delivered on major arterial road (sighted examples). The Environmental Specialist combines the volumes to determine the total tonnes of coal and bulk products received at the site by public and private roads.</p> <p>The Monthly Operational Reports include a summary of information including:</p> <ul style="list-style-type: none"> Annual loading summary for each berth which includes the number of vessels and tonnages of coal loaded per month and with year to date totals Ship Loading Summary Report which includes the tonnes of coal exported by shipping company and by ship Rail Summary Report which details the number of trains per day and the tonnes received Road Receiving Summary Report which details the tonnes received by Zone per day <p>A review of the AEMRs indicated the following amounts of coal / product were received:</p> <p><u>2015 / 2016</u></p> <p>Shipping receipt: 10,845,709 Road and Rail receipt: 10,534,448</p> <p><u>2014 / 2015</u></p> <p>Shipping receipt: 13,169,571 tonnes Road and Rail receipt: 13,072,102 tonnes</p> <p><u>2013 / 2014</u></p> <p>Shipping receipt: 12,654,973 tonnes Road and Rail receipt: 12,309,165 tonnes</p> <p>The scale of activities was as per the EPL.</p>	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Coal Works	Coal Works	>5,000,000 T annual handling capacity											
Shipping in Bulk	Shipping in Bulk	>500,000 T of annual capacity to load and unload											
EPL 1625, A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:</p> <ol style="list-style-type: none"> the applications for any licences (including former pollution control approvals) which this licence replaces under the <i>Protection of the Environment Operations (Savings and Transitional) Regulation 1998</i>; and the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence. 	<ul style="list-style-type: none"> EPL 1625 	<p>Site management reported that no works and activities outside those specified in the EPL application have been undertaken during the audit period. No works and activities outside those specified in EPL 1625 were observed during the site inspection.</p>	Compliant									

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation																																																			
EPL 1625, P1.1	<p>The following points (ordered by EPA ID numbers) referred to below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1"> <thead> <tr> <th>EPA ID No.</th> <th>Type of Monitoring</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dust Deposition monitoring</td> <td>25 m south of Bulk Products Berth</td> </tr> <tr> <td>2</td> <td>Dust Deposition monitoring</td> <td>40 m south of the Bulk Products Berth's east stockyard</td> </tr> <tr> <td>3</td> <td>Dust Deposition monitoring</td> <td>40 m east of Bulk Products Berth's east stockyard</td> </tr> <tr> <td>4</td> <td>Dust Deposition monitoring</td> <td>40 m east of coal berth stockyard</td> </tr> <tr> <td>5</td> <td>Dust Deposition monitoring</td> <td>Northern Pond</td> </tr> <tr> <td>6</td> <td>Dust Deposition monitoring</td> <td>40 m west of coal berth stockyard</td> </tr> <tr> <td>7</td> <td>Dust Deposition monitoring</td> <td>250 m west of coal berth stockyard</td> </tr> <tr> <td>8</td> <td>Dust Deposition monitoring</td> <td>Northern truck wash</td> </tr> <tr> <td>9</td> <td>Dust Deposition monitoring</td> <td>Sydney Water recycled water plant</td> </tr> <tr> <td>12</td> <td>Dust Deposition monitoring</td> <td>157 Church Street Wollongong</td> </tr> <tr> <td>15</td> <td>Dust Deposition monitoring</td> <td>North of planning office</td> </tr> <tr> <td>17</td> <td>Dust Deposition monitoring</td> <td>Entry gate to Berth 109</td> </tr> <tr> <td>18</td> <td>Dust Deposition monitoring</td> <td>Links Seaside Apartments, 1 Ross Street, Wollongong</td> </tr> <tr> <td>19</td> <td>Dust Deposition monitoring</td> <td>Vikings Oval</td> </tr> <tr> <td>20</td> <td>Ambient air monitoring</td> <td>Southern monitoring site Southern pond</td> </tr> <tr> <td>21</td> <td>Ambient air monitoring</td> <td>Northern monitoring site Northern pond</td> </tr> </tbody> </table>	EPA ID No.	Type of Monitoring	Location description	1	Dust Deposition monitoring	25 m south of Bulk Products Berth	2	Dust Deposition monitoring	40 m south of the Bulk Products Berth's east stockyard	3	Dust Deposition monitoring	40 m east of Bulk Products Berth's east stockyard	4	Dust Deposition monitoring	40 m east of coal berth stockyard	5	Dust Deposition monitoring	Northern Pond	6	Dust Deposition monitoring	40 m west of coal berth stockyard	7	Dust Deposition monitoring	250 m west of coal berth stockyard	8	Dust Deposition monitoring	Northern truck wash	9	Dust Deposition monitoring	Sydney Water recycled water plant	12	Dust Deposition monitoring	157 Church Street Wollongong	15	Dust Deposition monitoring	North of planning office	17	Dust Deposition monitoring	Entry gate to Berth 109	18	Dust Deposition monitoring	Links Seaside Apartments, 1 Ross Street, Wollongong	19	Dust Deposition monitoring	Vikings Oval	20	Ambient air monitoring	Southern monitoring site Southern pond	21	Ambient air monitoring	Northern monitoring site Northern pond	<ul style="list-style-type: none"> The listed monitoring points are listed in the monitoring reports and monitoring database. Dust monitoring spreadsheet 	<p>A review of the monitoring data for the audit period indicated that monitoring was being undertaken at the monitoring points specified in the EPL.</p> <p>A number of dust gauges were sighted during the audit site inspection. Cages were observed to have been added to the publically accessible gauges along the eastern edge of the terminal.</p> <p>The southern monitoring site (Point 20) was inspected during the audit site inspection. The northern location (Point 21) was not able to be inspected due to access limitations (is on a Sydney Water site).</p>	Compliant
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Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation																																																
EPL 1625, P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.		None specified	N/A																																																
EPL 1625, P1.3	<p>The following utilisation areas referred to below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area. The type of monitoring point to which it applies is wet weather discharge and discharge quality monitoring.</p> <table border="1"> <thead> <tr> <th>EPA ID No.</th> <th>Type of Monitoring</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>16</td> <td>Discharge to waters Water quality monitoring</td> <td>DP16 Outlet of Settlement Lagoon</td> </tr> <tr> <td>22</td> <td>Wet weather discharge Discharge quality monitoring</td> <td>DP22 TS1 Pond</td> </tr> <tr> <td>23</td> <td>Wet weather discharge Discharge quality monitoring</td> <td>DP23 Central Pond</td> </tr> <tr> <td>24</td> <td>Wet weather discharge Discharge quality monitoring</td> <td>DP24 Tower 3 Pond</td> </tr> <tr> <td>25</td> <td>Wet weather discharge Discharge quality monitoring</td> <td>DP25 Southern Pond</td> </tr> <tr> <td>26</td> <td>Wet weather discharge Discharge quality monitoring</td> <td>DP26 Workshop Pond</td> </tr> </tbody> </table>	EPA ID No.	Type of Monitoring	Location description	16	Discharge to waters Water quality monitoring	DP16 Outlet of Settlement Lagoon	22	Wet weather discharge Discharge quality monitoring	DP22 TS1 Pond	23	Wet weather discharge Discharge quality monitoring	DP23 Central Pond	24	Wet weather discharge Discharge quality monitoring	DP24 Tower 3 Pond	25	Wet weather discharge Discharge quality monitoring	DP25 Southern Pond	26	Wet weather discharge Discharge quality monitoring	DP26 Workshop Pond	<ul style="list-style-type: none"> Visual Inspection 	The monitoring and discharge points referred to by the EPA identification points were observed during the Site inspection.	Compliant																											
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EPL 1625, L1.1	<p>LIMIT CONDITIONS</p> <p>Pollution of Waters</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>	<ul style="list-style-type: none"> 2015 / 2016 EPL Annual Return. EPA Formal Warning Letter dated 3.09.15 (Notice Number 1533582). Official Caution: Sump overflow event on 5 June 2014 dated 10.09.14 (Notice Number: 1523625). Formal Warning Letter dated 19.07.16 (Notice Number 1542400) Formal Warning Letter dated 25.07.14 (Notice Number:1523451) 	<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 otop 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 (m³)</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> <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 3 Pond</td> <td>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> </tbody> </table>		Component	LDP No.	Catchment Area (ha)	Volume (m ³)	Discharge to	1	Settlement Lagoon	LDP 16	NA	7,300	Garungaty Waterway	2	TS1 Pond	LDP 22	4.3	1,550	Settlement Lagoon	3	Central Pond	LDP 23	17.7	7,480	Settlement Lagoon	4	Tower 3 Pond	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>Non-compliant Medium Risk</p>
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Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
			<p>PKCT reported the following pollution incidents to the EPA during the audit period.</p> <ul style="list-style-type: none"> • 25-27 March & 4-6 April 2014: Turbid water discharges following a severe storm event. • 5 June 2014: Pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm event. • 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. • 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 2015. On 4 August 2015 PKCT received an email from the EPA indicating the EPA would be taking no further action concerning the incident. • 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. <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"> • Blocking the RCP stockpile drain to prevent contaminated water inflow • Repairing the western containment wall of the stockpile where required to prevent seepage • Diverting the flow from No.1 Berth South Position Pump 17 towards T3 Pond • 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 <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 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>	

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation									
EPL 1625, L2.1 & L2.4	<p>Concentration Limits</p> <p>For each monitoring/discharge point or utilisation area specified in the table(s) 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>Point 16</p> <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 & 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	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2015 EPL Annual Return. PKCT, No Date, PKCT Central Pond Upgrade, Pollution Reduction Program 12, Stage 1(e) Review of Environmental Performance of Upgrade Works. EPA, 2017, Notice of Variation of Licence No. 1625, 16 January 2017, Ref: EF12/3447. PKCT, Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922. Site Observations. PKCT, 2014, Environmental Monitoring Report, January 2015. PKCT, 2015, Environmental Monitoring Report, January 2016. PKCT, 2016, Environmental Monitoring Report, January 2017. PKCT, 2017, Environmental Monitoring Report, February 2017. EPL Water Quality Data.xlsx. Site Observations. 	<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"> Five TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 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. <p><u>2015:</u></p> <ul style="list-style-type: none"> Four TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 1 May 2015 = 60 mg/L, 10 May 2015 = 57 mg/L, 12 May 2015 = 110 mg/L and 13 May 2015 = 54 mg/L. <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 "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". 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 "measured monthly TSS average pre-upgrade [in the Central Pond] was 202 mg/L and as of June 2016 79 mg/L post upgrade". 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"> 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 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. 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. An unsealed area near the Central Pond Pump was sealed in February 2016. Isolation of inflows into ponds allows for drying of slurry. Sealing of entry/exit ramps into ponds minimises sediment 'drag' out of the ponds and onto internal roadways. <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>	<p>Non-compliant</p> <p>Low risk</p>
Pollutant	Unit of Measure	100 Percentile Concentration Limit											
Oil & Grease	Visible	Not Visible											
Total Suspended Solids	Milligrams per litre	50											
EPL 1625, L2.2	Where a pH quality limits specified in the table, the specified percentage of samples must be within the specified ranges.		pH limits were removed from the EPL by variation dated 15 September 2014.	Not triggered									
EPL 1625, L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in table (stated under L2.4).		Noted. Refer L2.1.	Noted									

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, L2.5	Exceeding the limit specified in Condition L2.4 of this licence for Total Suspended Solids for discharges from Point 16 identified by Conditions P1.2 and P1.3 is only permitted when the discharge occurs solely as a result of rainfall measured at the premises. For discharge to be considered to occur solely as a result of rainfall, the rainfall must exceed a 5 day rainfall depth value of 90 mm over a consecutive 5 day period.	<ul style="list-style-type: none"> EPL Water Quality Data.xlsx. Wind_data.xlsx 	<p>This Condition was added to the EPL by variation dated 15 September 2014. Since this time, the TSS limit was exceeded on the following occasions following a 5 day 90mm rainfall event as permitted:</p> <ul style="list-style-type: none"> 20 April 2015: TSS of 82 mg/L following 144 mm of rain on 20.04.15 	Compliant
EPL 1625, L2.6	The licensee must provide the EPA with a copy of the statistical correlation assessment methodology and results before using Turbidity (NTU) in place of Total Suspended Solids (TSS).		PKCT did not use turbidity (NTU) in place of TSS during the audit period, as such this condition was not applicable.	Not triggered
EPL 1625, L2.7	The licensee must develop and implement a method to enable the ongoing verification of the relationship between NTU and TSS.		As L2.5 above, not applicable.	Not triggered
EPL 1625, L2.8	The licensee must provide the EPA with any amendments the licensee makes to the statistical correlation as a result of the ongoing verification required by Condition L4.2 before using the revised statistical correlation.		As L2.5 above, not applicable.	Not triggered
EPL 1625, L3.1	<p>Waste</p> <p>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.</p>	<ul style="list-style-type: none"> Site Observations. 	<p>Site management reported that no waste was received at the premises during the audit period.</p> <p>No waste which looked like it may have been generated outside the premises was observed during the Site inspection.</p>	Compliant
EPL 1625, L3.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.		Noted	Noted
EPL 1625, L4.1	<p>Noise Limits</p> <p>The proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the limits specified below for the location nearest to that residence.</p> <ul style="list-style-type: none"> Corner of Swan and Kembla Streets - Day: 51dB(A); Evening: 50dB(A); Night: 49dB(A) Corner of Swan and Corrimal Streets - Day: 51dB(A); Evening: 50dB(A); Night: 49dB(A) Corner of Keira and Fox Streets - Day: 55dB(A); Evening: 49dB(A); Night: 45dB(A) <p>Notes: Refer to EPL.</p>		Refer to DA 08_0009, S3.C1.	Compliant

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, L5.1	<p>Potentially Offensive Odour</p> <p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p> <p><i>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</i></p>	<ul style="list-style-type: none"> Site Observations. Community Complaints Enquiry Register 2013 – 2016. 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. 	<p>A review of the Complaints Register indicated that there were no odour related complaints received during the audit period.</p> <p>No offensive odours were noted during the Site inspection.</p>	Compliant
EPL 1625, O1.1	<p>OPERATING CONDITIONS</p> <p>Activities Must be Carried out in a Competent Manner</p> <p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>c) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>d) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<ul style="list-style-type: none"> PKCT Task Observation Sheet, Roads & Unsealed Areas Dust Control, 19 January 2017. PKCT Task Observation, Environment Workshop and Store Areas, 13 February 2017. Facilities Maintenance Service Agreement Spill Kit Audit Sheet, 27 October 2016. Facilities Maintenance Service Agreement Spill Kit Audit Sheet, 20 January 2017. T&D Metals and Demolitions, Unanderra example dockets dated 2.06.15, 5.06.15, 19.06.15 2014-15 Annual Return Email to EPA dated 4.09.15 providing status of action plan. EPA letter dated 29.09.15 attaching comments on progress against Action program 	<p>PKCT has established processes for managing the processing, handling, movement and storage of coal including:</p> <ul style="list-style-type: none"> 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, Under wagon monitoring to detect poorly loaded trains. Spillage recovery systems and processes to recover as much product coal as possible Event Management System for the investigation and corrective action of incidents and complaints <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 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 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&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>Non-compliant</p> <p>Low risk</p> <p>REC-2017-04 – Request from waste contractor that it provides the destination of waste taken off site.</p> <p>OFI-2017-05 – Update Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation								
EPL 1625, O2.1	<p>Maintenance of Plant and Equipment</p> <p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>c) must be maintained in a proper and efficient condition; and</p> <p>d) must be operated in a proper and efficient manner.</p>		Refer to DA 08_0009 S2.C13	Non-compliant Medium Risk								
EPL 1625, O3.1	<p>Dust</p> <p>The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.</p>	<ul style="list-style-type: none"> Achieved through combination of work practices, meteorological monitoring, water sprays and dust monitoring. 	<p>Site observations verified that the activities occurring on site i.e. road receipt, coal stockpiling, coal transfer, ship loading, on-site road traffic and truck washing, were being carried out in a manner that minimised generation of emissions of windblown or traffic generated dust.</p> <p>Incorporation of the monitoring data collected to the north and south of the facility has not been connected to the site automatic alert system. It is understood that a system is in the process of being developed for implementation within the next 12 months. Alerts linked to real-time monitoring will aid in ensuring any elevated dust levels are detected and minimised to the extent practicable.</p>	Compliant								
EPL 1625, O3.2	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation or emission, of windblown or traffic generated dust.	<ul style="list-style-type: none"> Various activities are outlined in the AQMP aimed at reducing the potential for the generation of dust. 	Various measures were observed on the day of the audit, including the stockpile spray locations (although wind was too low on the day to trigger the sprays), low drop heights for the stockpile stacking, road sprays in the unloading area, conveyor cleaning and truck washing. Road dust maintenance was observed on the day of the audit.	Compliant								
EPL 1625 O3.3	All loaded trucks entering or leaving the premises must have their loads covered		Refer to DA 08_0009, S3.C9	Compliant								
EPL 1625, O4.1	<p>The following ponds referred to in the table below are identified in this licence for the purposes of identifying ponds in Condition O4.2.</p> <table border="1" data-bbox="311 1255 991 1705"> <thead> <tr> <th>Sedimentation Pond</th> </tr> </thead> <tbody> <tr> <td>TS1</td> </tr> <tr> <td>Northern Pond</td> </tr> <tr> <td>Settlement Lagoon</td> </tr> <tr> <td>Workshop Pond</td> </tr> <tr> <td>Central Pond</td> </tr> <tr> <td>Tower 3 Pond</td> </tr> <tr> <td>Southern Pond</td> </tr> </tbody> </table>	Sedimentation Pond	TS1	Northern Pond	Settlement Lagoon	Workshop Pond	Central Pond	Tower 3 Pond	Southern Pond	<ul style="list-style-type: none"> Site Observations. 	<p>The following ponds and associated licenced discharge points were observed during the Site inspection:</p> <ul style="list-style-type: none"> LDP 16 - Outlet of Settlement lagoon, Water Quality Monitoring - Discharges to Waters. LDP 22 - TS1 Pond, Water Quality Monitoring - Discharges to Waters. LDP 23 - Central Pond, Water Quality Monitoring - Discharges to Waters. LDP 24 - Tower 3 Pond, Water Quality Monitoring - Discharges to Waters. LDP 25 - Southern Pond, Water Quality Monitoring - Discharges to Waters. LDP 26 - Workshop Pond, Water Quality Monitoring - Discharges to Waters. 	Noted
Sedimentation Pond												
TS1												
Northern Pond												
Settlement Lagoon												
Workshop Pond												
Central Pond												
Tower 3 Pond												
Southern Pond												

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
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.	<ul style="list-style-type: none"> 2015 / 2015 EPL Annual Return. Site Observations. PKCT Pond Capacity Tables.xlsx. PKCT, Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922. 	<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"> 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 period. The Central Pond Upgrade project was completed in February 2016. 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. 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. <p>Given the reported Annual Return non-compliance for the period 2015 / 2016 this condition was found to be non-compliant.</p>	<p>Non-compliant</p> <p>Medium Risk</p> <p>REC-2017-05 – Update the Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet.</p>
EPL 1625, M1.1	<p>MONITORING AND RECORDING CONDITIONS</p> <p>Monitoring Records</p> <p>The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.</p>	<ul style="list-style-type: none"> ALS Environmental, PKCT Dust Monitoring Service Report, December 2016 to January 2017, Ref: SR161228. Katestone, 2016, PKCT Dust Monitoring Report for Annual Return, April 2015 to March 2016. Katestone, 2015, PKCT Annual Environmental Monitoring Report, July 2014 to June 2015, August 2015. EcoTab Trial Data.xlsx. EPL Water Quality Data.xlsx. Dust.xlsx. Daily Rainfall Data.xlsx – 1 July 2015 to 31 January 2017. 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. PKCT EPL 1625 Monthly Reports: December 2014, December 2015, December 2016, January 2017. 	<p>Monitoring results are compiled and stored on spread sheets stored on the PKCT network drive.</p> <p>Monitoring results for monthly monitoring data were sighted and available for the audit period.</p> <p>Environmental reports containing environmental monitoring data prepared by external consultants were available for review.</p> <p>Reports included but were not limited to noise, water and air emission data.</p>	Compliant
EPL 1625, M1.2	<p>All records required to be kept by this licence must be:</p> <ol style="list-style-type: none"> in a legible form, or in a form that can readily be reduced to a legible form; kept for at least 4 years after the monitoring or event to which they relate took place; and produced in a legible form to any authorised officer of the EPA who asks to see them. 	<ul style="list-style-type: none"> Katestone, 2015, PKCT Annual Environmental Monitoring Report, July 2014 to June 2015, August 2015. EcoTab Trial Data.xlsx. EPL Water Quality Data.xlsx. Dust.xlsx. Daily Rainfall Data.xlsx – 1 July 2015 to 31 January 2017. 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. PKCT EPL 1625 Monthly Reports: December 2014, December 2015, December 2016, January 2017. 	<p>Monitoring results for monthly monitoring data were sighted and available for the audit period as well as preceding years. It is considered that the monitoring records are maintained in compliance with the requirements of this condition and may be made available upon requests of an authorised officer.</p> <p>Records are maintained on the internal PKCT server.</p>	Compliant
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> <ol style="list-style-type: none"> the date(s) on which the sample was taken; the time(s) at which the sample was collected; the point at which the sample was taken; and the name of the person who collected the sample. 	<ul style="list-style-type: none"> Daily Rainfall Data.xlsx – 1 July 2015 to 31 January 2017. 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. PKCT EPL 1625 Monthly Reports: December 2014, December 2015, December 2016, January 2017. 	<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 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.</p>	<p>Compliant</p> <p>OFI-2017-11 - Ensure the contractor undertaking the depositional dust monitoring includes a record of the time the depositional dust gauges were collected.</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation																												
EPL 1625, M2.1 and M2.2	<p>Monitoring Concentration of Pollutants Discharged and Air Monitoring Requirements</p> <p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by 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>Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19</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>Point 20, 21</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>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</td> </tr> <tr> <td>PM2.5</td> <td></td> <td></td> <td></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				<ul style="list-style-type: none"> The air quality management plan and the results recorded in the facility monitoring database and annual reports demonstrate that the monitoring requirements have been achieved. Letter from EPA dated 15.07.16 re Assessment of Annual Return 2015-16 Letter to EPA dated 30.08.16 including update to Section C2 of 2015 / 2016 Annual Return. 	<p>Particulates – deposited matter was using dust deposition gauges at the specified locations (Pointe 1-9, 12, 15, 17, 18, 19). TSP, PM₁₀ and PM_{2.5} monitoring was conducted using OSIRIS instruments located north and south of the coal terminal (Points 20 and 21).</p> <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"> 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. 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. 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. <p>Due to the non-compliances with this requirement reported in the Annual Returns, this condition has been assessed as non-compliant.</p>	<p>Non-compliant</p> <p>Low risk</p>				
Pollutant	Unit of Measure	Frequency	Sampling Method																													
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EPL 1625, M2.3	<p>Water and/ or Land Monitoring Requirements</p> <p>Point 16</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>Oil & Grease</td> <td>Visible</td> <td rowspan="3">Daily During Any Discharge</td> <td>Visual Inspection</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Grab Sample</td> </tr> <tr> <td>TSS</td> <td>Milligrams per litre</td> <td></td> </tr> </tbody> </table> <p>Point 22,23,24,25,26</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>Oil & Grease</td> <td>Visible</td> <td rowspan="3">Daily During Discharge</td> <td>Visual Inspection</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Grab Sample</td> </tr> <tr> <td>TSS</td> <td>Milligrams per litre</td> <td></td> </tr> </tbody> </table>	Pollutant	Unit of Measure	Frequency	Sampling Method	Oil & Grease	Visible	Daily During Any Discharge	Visual Inspection	pH	pH	Grab Sample	TSS	Milligrams per litre		Pollutant	Unit of Measure	Frequency	Sampling Method	Oil & Grease	Visible	Daily During Discharge	Visual Inspection	pH	pH	Grab Sample	TSS	Milligrams per litre		<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. PKCT EPL 1625 Monthly Report, December 2016. EPL Water Quality Data.xlsx. 	<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 Pond). A review of the 2015-16 Annual Return provided results for one monitoring event.</p> <p>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.</p> <p>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.</p>	<p>Compliant</p> <p>OFI-2017-12 – Review the requirements of the POEO Act for publishing monitoring data</p>
Pollutant	Unit of Measure	Frequency	Sampling Method																													
Oil & Grease	Visible	Daily During Any Discharge	Visual Inspection																													
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TSS	Milligrams per litre																															

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, M3.1	<p>Testing methods - Concentration Limits</p> <p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p><i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2002 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i></p>	<ul style="list-style-type: none"> Inspection of a number of DDG location confirmed that the sampling was being undertaken with the requirements in the Australian standard. In particular, bottle capacity, site security and height of the gauge were correct. 	<p>Monitoring method was confirmed to be appropriate. The methods used for the sampling were as follows:</p> <ul style="list-style-type: none"> Dust Gauges sampled in accordance with AM19, which corresponds with AS 3580.10.1-2003. Note that the AS 3580.10.1-1991 method referenced in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW has been superseded. PKCT confirmed that the laboratory analysis was undertaken by NATA certified laboratory. The dust concentration is not sampled in accordance with a NSW EPA method or Australian standard (although the siting of the units is in accordance with the Australian Standard for the Siting of monitoring equipment). Sampling using the OSIRIS monitors is intended as a project control measure and real-time warning of elevated dust concentration. It is not intended as a compliance measure and as such this does not constitute a non-compliance. <p>The previous IEA (AECOM 2014) assessed this condition as non-compliant as a funnel at Dust Deposition gauge P4 was observed to be missing during the audit site inspection. The 2014 IEA recommended that "PKCT install a locked cage at this monitoring site to avoid future tampering, and undertake regular monitoring at this site to verify tampering has not occurred and the device is still functional." Since the 2014 Audit, additional security measures have been installed around the off-site dust gauges to prevent vandalism of the bottles and gauge stands. These were observed during the audit site inspection.</p>	Compliant
EPL 1625, M4.1	<p>Environmental Monitoring</p> <p>The licensee is required to install and maintain a rainfall depth measuring device.</p>	<ul style="list-style-type: none"> Site Observations. 	<p>A new tipping bucket rain gauge was installed during the audit period. This was observed during the site inspection. Prior to this, rainfall was measured using a pluviometer located on the Central Control Tower.</p>	Compliant
EPL 1625, M4.2	<p>Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.</p>	<ul style="list-style-type: none"> Rainfall Data Daily.xlsx. PKCT Rain, January 2017. 	<p>The Auditors sighted the Rainfall Data Daily spreadsheet which contained the data from the tipping bucket rain gauge. It contained daily rain accumulation in millimetres (mm) for the period 1 July 2015 through to 31 January 2017.</p> <p>The Wind Data spreadsheet also contained daily rainfall data for the period 16.03.09 to the 21.12.16.</p> <p>The Auditors sighted a 'Factory Talk' rainfall screenshot that showed rain in mm for the previous day and the previous week. A timestamp showed rain in mm from Thursday 23 February through to Wednesday 8 March 2017.</p>	Compliant
EPL 1625, M5.1	<p>Recording of Pollution Complaints</p> <p>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</p>	<ul style="list-style-type: none"> Community Complaints Enquiries Register Event Report EV-01506 Event Report EV-01646 	<p>The process of recording and responding to complaints was discussed with PKCT during the audit and described as follows:</p> <ul style="list-style-type: none"> Complaints (as well as incidents) are recorded in PKCT's Event Management System (EMS). When a complaint is received by the call centre via the 1800 111 448 number, an SMS and email alert is sent to the pre-assigned list of PKCT managers. The first person available contacts the complainant and initiates the investigation process. The complaint is logged in EMS as event type: 'Community' and the following information entered: Event details (date, time, brief description, immediate actions taken); Preliminary Findings (root cause of the incident, suggested actions, assigned approver); Investigation Findings; Event Close Details (event close date, verified by). The complaint needs to be verified by someone other than the person who investigated the complaint. <p>EMS was demonstrated to the auditors during the site inspection. The auditors reviewed the Community Complaints Enquiries Register and the 'Event Report' for the complaints received during the audit period.</p>	Compliant

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
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 note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	<ul style="list-style-type: none"> Community Complaints Enquiries Register Event Report EV-01506 Event Report EV-01646 	<p>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:</p> <ul style="list-style-type: none"> 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. 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 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. 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>Compliant</p> <p>OFI-2017-13 - Consider adding the following fields to the 'Event Report' to ensure they are always captured:</p> <ul style="list-style-type: none"> method by which complaint was made; complainant personal details
EPL 1625, M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Community Complaints Enquiries Register 	<p>Complaints saved as part of the PKCT Events management system. Complaints observed from 2011-2016.</p> <p>It was reported that records of complaints are kept indefinitely.</p>	Compliant
EPL 1625, M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.		It was reported that the EPA has never requested to see records of complaints.	Not triggered
EPL 1625, M6.1	Telephone Complaints Line The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	<ul style="list-style-type: none"> PKCT website: www.pkct.com.au 	PKCT operates a freecall Community Hotline: 1800 111 448	Compliant
EPL 1625, M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	<ul style="list-style-type: none"> PKCT website: www.pkct.com.au 	Details of the Community Hotline are provided on the PKCT website under the Community and Environment page.	Compliant
EPL 1625, M6.3	Conditions M6.1 and M6.2 do not apply until 3 months after: (a) the date of the issue of this licence or (b) if this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation.		Noted.	Not triggered
EPL 1625, M7.1	OTHER MONITORING AND RECORDING CONDITIONS Noise Monitoring 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.	<ul style="list-style-type: none"> 07355-NM-9 Noise Monitoring July 2014 VerA_FINAL 07355-NM-10 Noise Monitoring December 2014 VerA_JM_Final Report 07355-NM-11 Noise Monitoring June 2015 VerA_JM 	<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&E (by letters dated 30.08.16). This request was accepted by the DP&E by letter dated 16.03.17 however it was reported that the EPA did not formally respond to the request.</p>	<p>Not verified</p> <p>REC-2017-08 Seek a variation to the EPL to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
		<ul style="list-style-type: none"> 07355-NM-12 Noise Monitoring December 2015 VerA 07355-NM-13 Noise Monitoring_VerA_April 2016 Letter to EPA dated 30.08.16 Letter to DP&E dated 30.08.16 DP&E letter re 170316_AEMR amendments_signed letter 	As formal EPA approval to remove the requirement for monitoring could not demonstrated, this condition could not be verified.	
EPL 1625, M7.2	The noise monitoring program must be reviewed by the licensee. If no exceedance of the criteria occurs for 6 years and the EPA is satisfied with the review, noise monitoring will not be required to continue.		Refer M7.1 above	Not verified
EPL 1625, R1.1	<p>REPORTING CONDITIONS</p> <p>Annual Return Documents</p> <p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <p>a) a Statement of Compliance; and</p> <p>b) a Monitoring and Complaints Summary.</p> <p>A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. 	Annual Return documents have been prepared and submitted by PKCT as required by this Condition R1.1. The Auditors sighted signed Annual Returns for the 2014 / 2015 period and the 2015 / 2016 period that contained a Statement of Compliance and Monitoring and Complaints Summary.	Compliant
EPL 1625, R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. 	Annual Return documents for the periods 2013, 2014 and 2015 were available for review.	Compliant
EPL 1625, R1.3	Where this licence is transferred from the licensee to a new licensee: <p>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</p> <p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	-	Noted. This requirement has not been triggered.	Not triggered
EPL 1625, R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	-	Noted. This requirement has not been triggered.	Not triggered

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	<ul style="list-style-type: none"> EPA (2017), Licence Summary, Online, Available at: http://www.epa.nsw.gov.au, Accessed 13 March 2016 	<p>The Annual Return deadline is the 31 May of the current year.</p> <p>The EPA website indicated the Annual Returns for the audit period were received on the following dates:</p> <ul style="list-style-type: none"> The 01-Apr-2014 to 31-Mar-2015 Annual Return was received on 28 May 2015 (57 Days). The 01-Apr-2015 to 31-Mar-2016 Annual Return was received on 27 May 2016 (58 Days). 	Compliant
EPL 1625, R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. 	Annual Return documents for the 2014 / 2015 period and the 2015 / 2016 were available for review.	Compliant
EPL 1625, R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: <ul style="list-style-type: none"> a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder. 	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return. 2015 / 2016 EPL Annual Return. 	<p>The Annual Return for the 2014 / 2015 period had been completed and signed (26 May 2015) by the Director and Company Secretary before the due date.</p> <p>The Annual Return for the 2015 / 2016 period had been completed and signed (22 May 2016) by the Director and Company Secretary before the due date.</p>	Compliant
EPL 1625, R2.1	<p>Notification of Environmental Harm</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>	<ul style="list-style-type: none"> EPA Confirmation of incident report call to Environment Line dated 18.03.15 Email to EPA dated 18.03.15 subject: PKCT Wash-down Event 18/03/2015 Email to EPA dated 4.08.15 Subject: PKCT Shiploader Washdown Event 28/07/15 Email to EPA dated 28.08.15 Subject: PKCT Coal berth – harbour discharge while shiploading. EPA letter dated 19.07.16 issuing Formal Warning for breach of Licence Condition L1.1 in relation to the shiploading incidents during July and August 2015 Email to EPA dated 6.06.14 notifying sump overflow on 5 June 2014. EPA letter dated 18.09.14 attaching Official Caution Official Caution: Sump overflow event on 5 June 2014 dated 10.09.14 (Notice Number: 1523625). Email to EPA dated 10.04.14 re turbid water overflows following March / April 2014 storm event. 	<p>The following notifications were made to the Environment Line during the audit period:</p> <ul style="list-style-type: none"> 18 March 2015: washdown water containing coal fines was discharged into Port Kembla harbour during routine cleaning of Shiploader 1 over Coal Berth 102. 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. 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. <p>In addition the following were reported to PKCT's local EPA officer:</p> <ul style="list-style-type: none"> 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 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. 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'. <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>Non-compliant</p> <p>Low risk</p> <p>REC-2017-06 – 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>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	<ul style="list-style-type: none"> Email to EPA dated 6.06.14 notifying sump overflow on 5 June 2014. Email to EPA dated 18.03.15 subject: PKCT Wash-down Event 18/03/2015. Email to EPA dated 4.08.15 Subject: PKCT Shiploader Washdown Event 28/07/15. Response email from EPA dated 4.08.15. 	<p>The 24-27 March incident was reported to the EPA via email dated 10.04.14. The EPA requested an incident report be prepared (refer R3.1).</p> <p>The 5 June 2014 incident was reported to the EPA via email dated 6.05.14. The EPA requested an incident report be prepared (refer R3.1).</p> <p>PKCT provided written details of the 18 March 2015 incident to the EPA via email on the 18.03.15. The EPA requested an update upon completion of PKCT's investigation into the incident. PKCT responded with an update by email dated 1.05.15.</p> <p>PKCT provided written details of the 28 July 2015 incident to the EPA via email dated 4.08.15. The EPA responded by email dated 4.08.15 that it did not propose to take any further action.</p> <p>PKCT provided written notification of the 28 August 2015 incident to the EPA by email dated 28.08.15. Further details following investigation into the incident were provided to the EPA by email dated 30.09.15</p>	Compliant
EPL 1625, R3.1	<p>Written Report</p> <p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>	<ul style="list-style-type: none"> Email from EPA dated 16.04.14 requesting incident report for discharge 24-27 March 2014. Letter to EPA dated 16.05.14 Subject: Request for Incident Report – Storm Event 24-27 March 2014. Formal Warning Letter (Notice No: 1523451) dated 21.07.14 PKCT Response to Formal Warning Letter dated 29.09.14, Update on PKCT Response to Formal Warning Letter dated 13.08.15. Email from EPA dated 11.06.14 requesting incident report for 5 June 2014 overflow event. Email to EPA dated 4.07.14 submitting incident report for 5 June overflow event. Email to EPA dated 2.07.14 submitting PPM report. <i>BPB Pump 9 (C7 Sumo) Storm Water System Report</i> PPM 29.08.14. 	<p>The EPA requested PKCT prepare an Incident Report for the 24-27 March discharges by email dated 16.04.14. An incident report was provided by the agreed date 16.05.14. The Incident Report addressed the requirements of R3.3 and included a report from PKCT's dosing unit service provider (Nalco) who assisted the investigation with water sampling and testing. The Incident Report committed to further actions including engaging an independent consultant to review the event and work done to date including the appropriateness of the flocculant in use and any product or supply related changes which may have led to its ineffectiveness. A Formal Warning Letter was issued by the EPA dated 21.07.14 which required PKCT to report on the implementation of the measures outlined in PKCT's Incident Report. A progress report on the status of the implementation of the actions was provided to the EPA by letter dated 29.09.14. A further update was provided to the EPA by letter dated 13.08.16 on completion of the consultant (EcoEngineers) investigation.</p> <p>The EPA requested PKCT prepare an Incident Report for the overflow event on the 5 June 2014 by email dated 11.06.14. The report was required to be submitted by the 4 July 2014. An incident report was provided by email dated 4 July 2014 and was also included as Attachment C to the 2014-15 Annual Return. The Incident Report identified a number of actions one of which was to engage a consultant to review the pump arrangement and to identify practical modifications and or upgrades to the system so that harbour flows do not occur. Project Portfolio Management (PPM) was engaged to undertake the review and its report (<i>'BPB Pump 9 (C7 Sumo) Storm Water System Report'</i>) along with an update on the status of implementation of the recommendations provided to the EPA by email dated 2.07.14.</p> <p>For the other incidents discussed under R2.1 above, written details were provided to the EPA however it is understood that the EPA did not make any formal requests for a written report under R3.1.</p>	Compliant
EPL 1625, R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		<p>PKCT responded to the EPA's requests relating to the above incidents and met the timeframes stipulated.</p> <p>Refer to R2.2 and R3.1</p>	Compliant

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, R3.3	<p>The request may require a report which includes any or all of the following information:</p> <ul style="list-style-type: none"> a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters. 		Noted. Refer R3.1	Not triggered
EPL 1625, R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		Noted. Refer R3.1	Not triggered

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, R4.1	<p>OTHER REPORTING CONDITIONS</p> <p>Ambient Air Monitoring Report</p> <p>The following must be submitted to the EPA with the Annual Return:</p> <p>A brief summary of the results for all Total Suspended Particulate (TSP) matter, Particulate Matter (PM₁₀) and Particulate Matter (PM_{2.5}) monitoring.</p> <p>Tabular presentation of all TSP, PM₁₀ and PM_{2.5} levels for monitoring/discharge point 20 and 21. The average result for TSP and PM10 must be detailed within the table.</p> <p>Where the 24-hour concentration of TSP exceeds 90µg/m³ at point 21, the licensee must undertake an assessment to determine the likely reason for the elevated level, including:</p> <ul style="list-style-type: none"> • weather data; • a comparison of TSP levels at monitoring/discharge point 20 and 21; • the proportion of TSP that is PM10, PM2.5 and PM1; • the contribution of operating conditions; and • other relevant factors. <p>Where the 24-hour concentration of PM10 exceeds 50µg/m³ at point 21, the licensee must undertake an assessment to determine the likely reason for the elevated level, including:</p> <ul style="list-style-type: none"> • weather data; • a comparison of PM₁₀ levels at monitoring/discharge point 20 and 21; • the proportion of PM₁₀ that is PM_{2.5} and PM₁; • the contribution of operating conditions; and • other relevant factors. <p>Ambient air quality information used to inform the licensee's Annual Environmental Monitoring Report for the financial year preceding 30 June in the reporting period and information used to inform the licensee's Interim Annual Environmental Monitoring Report for the six-month period from 1 July to 31 December in the reporting period may be used to satisfy Condition R4.1. Information collected from 1 January to 31 March in the reporting period may be submitted to the EPA with the next Annual Return.</p>	<ul style="list-style-type: none"> • 2014 / 2015 Annual Return • 2015 / 2016 Annual Return • Email chain between PKCT and EPA regarding draft Licence Variation. Last email from EPA dated 9.09.14. 	<p>This requirement was added into the EPL by variation dated 15.09.14.</p> <p>The 2014 / 2015 Annual Return submitted in May 2015 PKCT did not include an Ambient Air Monitoring Report. However correspondence with the EPA was sighted trying to align the timing of this reporting (April to March in line with the Annual Return) with the assessment undertaken as part of the AEMR process (July to June). This was accepted by the EPA and the first report included in the 2015 / 2016 Annual Return.</p> <p>The 2015 / 2016 Annual Return submitted in May 2016 included an Ambient Air Monitoring Report (AAMR). Air quality consultants Katestone were engaged by PKCT to gather data and provide analysis for air quality and compliance. The 2015-16 AAMR included:</p> <ul style="list-style-type: none"> • A brief summary of the TSP, PM10 and PM2.5 monitoring results • Tables of the TSP, PM10 and PM2.5 monitoring results (Tables 6, 7 and 8 in Attachment C) • The proportion of TSP that were made up of PM10, PM2.5 and PM1.0 for the 24 hour periods exceeding the TSP trigger level and / or PM10 air quality standard (Table 12 in Attachment C) • For exceedances of the 24 hour average TSP trigger level, the likelihood of PKCT contributing to exceedance levels, percentage of winds from direction of PKCT, contribution of PKCT to the exceeding 24-hour concentration (µg/m³, %, rating), and wind speed (Table 10 in Attachment C). <p>The report identified that on one occasion, on the 27 February 2016, the PKCT contribution to the recorded exceedance for both PM10 and TSP was rated as moderate (35%).</p> <p>The auditors consider the report adequately addresses the requirements of R4.1.</p>	Compliant

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
EPL 1625, R4.2	<p>Wet Weather Overflow Reporting</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 for each overflow:</p> <ul style="list-style-type: none"> a tabular presentation of the concentration of each pollutant specified in Condition M2.3; date and time of the commencement of each overflow; an estimate of the volume of each stormwater overflow and over what time period the overflow occurred; 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; an explanation as to why the overflow occurred; an estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1; the location(s) of the discharge; and was the discharge permitted by the licence. 	<ul style="list-style-type: none"> 2014 / 2015 EPL Annual Return – EPL Licence Condition R4.2 Wet Weather Overflow Reporting. 2015 / 2016 EPL Annual Return – EPL Licence Condition R4.2 Wet Weather Overflow Reporting. EPL Water Quality Data.xlsx. 	<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"> 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). <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"> 20 April 2015 to 22 April 2015 from LDP 23 and LDP 25. 25 August 2015 from LDP 22, LDP 23, LDP 24 and LDP 25. <p>The report(s) included:</p> <ul style="list-style-type: none"> A tabular presentation of the concentration of each pollutant specified in Condition M2.3. Date and time of the commencement of each overflow. An estimate of the volume of each stormwater overflow and the time period the overflow occurred. 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. An explanation as to why the overflow occurred. An estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1. The location(s) of the discharge. Whether the discharge was permitted by the licence. <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 & 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>Compliant</p> <p>OFI-2017-14 – The EPL Water Quality Data spread sheet should include a column that indicates whether samples were taken during an overflow event or were part of the routine monitoring program.</p>
EPL 1625, G1.1	<p>GENERAL CONDITIONS</p> <p>Copy of Licence Kept at the Premises of Plant</p> <p>A copy of this licence must be kept at the premises to which the licence applies.</p>	<ul style="list-style-type: none"> Site Observations. 	<p>A copy of the licence was available within the Site office.</p>	<p>Compliant</p>
EPL 1625, G1.2	<p>The licence must be produced to any authorised officer of the EPA who asks to see it.</p>	<ul style="list-style-type: none"> Site Observations. 	<p>Copies of the licence were observed to be available on-site and able to be provided to an authorised officer of the EPA upon request.</p>	<p>Compliant</p>
EPL 1625, G1.3	<p>The licence must be available for inspection by any employee or agent of the licensee working at the premises.</p>	<ul style="list-style-type: none"> Site observations. 	<p>A copy of the licence was available within the Site office.</p>	<p>Compliant</p>
G2.1	<p>OTHER GENERAL CONDITIONS</p> <p>Completed Programs</p> <p>Refer to EPL</p>		<p>Noted</p>	<p>Noted</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
<p>U1 EPL 1625, U1.1</p>	<p>POLLUTION STUDIES AND REDUCTION PROGRAMS</p> <p>EIP – Particulate Matter Control Best Practice Study</p> <p><i>Background / Objective</i></p> <p>Air quality in the Illawarra has been improving over time, however the community still remains sensitive to particulate matter and its potential effect on health and amenity. Though there are many sources of particulate emissions including natural, domestic and industrial; continuous improvements to dust controls need to be undertaken by licensees where practicable.</p> <p>The mining sector of NSW has been undertaking best practice benchmarking studies to reduce emissions of particulate matter from coal mining activities. A methodology was applied based on a Coal Mine Particulate Matter Control Best Practice: Site-Specific Determination Guideline (OEH, 2011) and NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining (OEH, 2011). This methodology is available for the licensee's use in assessing existing measures and those available to prevent/minimise particulate emissions from the licensee's premises.</p> <p><i>Methodology / Deliverables</i></p> <p>The licensee must conduct a Site-Specific Best Management Practice Study to identify the most practicable means to reduce particle emissions.</p> <p>The licensee must prepare a report which includes, but is not necessarily limited to, the following:</p> <ul style="list-style-type: none"> • Identification, quantification and justification of existing measures that are being used to minimise particle emissions; • Identification, quantification and justification of best practice measures that could be used to minimise particle emissions; and • Evaluation of the practicability of implementing these best practice measures. <p>The licensee shall be guided by the Coal Mine Particulate Matter Control Best Practice: Site-Specific Determination Guideline (OEH, 2011) document which includes some modifications to account for the licensee's activities. The document can be found at http://www.epa.nsw.gov.au/resources/air/20110813coalmineparticulate.pdf.</p> <p>All cost related information is to be included as an Appendix 1 of the Report.</p> <p>The report must be submitted by the licensee to the EPA by 30 June 2017.</p> <p>The report required by this condition, except for cost related information contained in Appendix 1 of the report, must be made publicly available on the licensee's website by 30 September 2017.</p>		<p>The reports related to this EIP were due outside the audit period</p>	<p>Not triggered</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
<p>U2 EPL 1625, U2.1</p>	<p>EIP - Use of Real Time Particulate Monitoring Data for Operational Control</p> <p><i>Background / Objective</i></p> <p>Port Kembla Coal Terminal (PKCT) has an ambient air quality monitoring program which utilises continuous dust particulate monitors and dust depositional gauges. Two continuous particle monitors are in place, described as LDP 20 – Southern Monitoring Site and LDP 21 – Northern Monitoring Site.</p> <p>Data generated is used to assess PKCT's contribution to local particulate emissions. Data is available in real time with an automated alerts system in place to warn of elevated dust levels which may relate to the licensee's site activities. The alerts are used to inform an operational response.</p> <p><i>Methodology / Deliverables</i></p> <p>The licensee must review the effectiveness of the real time particulate monitoring system used at PKCT and the associated management systems in place aimed at reducing dust emissions on site.</p> <p>The licensee must prepare a report which includes, but is not necessarily limited to, the following:</p> <ul style="list-style-type: none"> • A full and detailed description of the Trigger Action Response Plan (TARP), Standard Operating Procedures (SoP) or other plans and procedures, that are in place and currently used by PKCT. This should include how triggers are generated, justification of trigger levels, who warnings are sent to, how warnings are sent, and a description of the documented actions/responses that are currently in place and used by PKCT when triggers levels are exceeded. This should include any escalation pathways or response actions. • A description of any other investigations that are carried out by PKCT staff when elevated dust levels are reported, for example: wind speed, temperature, rainfall history, and sea conditions regarding possible generation of salt spray; • A review of the adequacy of existing documentation, including its usefulness to operational personnel; • A review of system reliability; • A review of the data generated by the monitoring system and its accuracy; and • Recommendations for any improvements to the TARPs/SoPs, management systems, and monitoring equipment. <p>The report must be submitted by the licensee to the EPA by 28 April 2017.</p>		<p>The report related to this EIP was due outside the audit period. PKCT reported that it was in the process of preparing the report at the time of the audit site inspection.</p>	<p>Not triggered</p>

Condition	Condition Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
<p>U3</p> <p>U3.1</p>	<p>EIP - Train Condition Exception Reporting</p> <p>The licensee will visually assess the train wagon condition for trains arriving and unloading coal at the premises. The aim of this condition assessment is to identify wagons that are consistently loaded in a manner that clearly is likely to contribute to spillage of coal in the rail corridor. Examples of conditions that are likely to contribute to spillage of coal into the rail corridor are provided in the document titled: "Coal Train EIP – Exception Conditions to be Reported". This includes but is not limited to wagons that have excessive amounts of coal on the wagon exterior, wagons that have uneven loads and/or wagons that are overloaded.</p> <p>All trains arriving at the premises observed to have wagons consistently loaded in a manner that is clearly likely to contribute to spillage of coal within the rail corridor must have their identifying details and loaded condition recorded by the licensee as an 'Train Condition Exception Report'.</p> <ul style="list-style-type: none"> • The Train Condition Exception Reporting process will commence on 1 December 2016 • The 'Train Condition Exception Report' will be provided to the appropriate load point within three (3) days of the train being observed by the Licensee. • The Licensee must provide a copy of the 'Train Condition Exception report' to the EPA within seven (7) days of the train being observed by the terminal • The Licensee and EPA will review the results of the Train Condition Exception Reporting Program in Q2 and Q4 2017 • At this time, the Licensee and EPA will determine if the program needs to continue past 30 November 2017 <p>This condition will cease to have effect on 30 November 2017 unless otherwise agreed with by the EPA.</p> <p><i>Note: This condition has been included on the Environment Protection Licences of the four main coal shipping terminals in New South Wales, which includes the following:</i></p> <ul style="list-style-type: none"> • <i>The Carrington Coal Terminal, for which Port Waratah Coal Services Ltd (PWCS) holds Environment Protection Licence 601;</i> • <i>The Kooragang Coal Terminal, for which Port Waratah Coal Services Ltd (PWCS) holds Environment Protection Licence 1552;</i> • <i>The NCIG Coal Terminal, for which Newcastle Coal Infrastructure Group Pty Ltd (NCIG) holds Environment Protection Licence 12693; and</i> • <i>The Port Kembla Coal Terminal, for which Port Kembla Coal Terminal Limited (PKCT) holds Environment Protection Licence 1625.</i> 	<ul style="list-style-type: none"> • Email dated 17.11.16 to shift coordinators and teams outlining requirements for train condition exception reporting 	<p>PKCT communicated this requirement internally to the relevant personnel (sighted email dated 17.11.16).</p> <p>As outlined in the email and discussed during the audit, PKCT undertakes under wagon monitoring. If a poorly loaded train is detected by the Shift Teams, they hit a button on the rail operations console. The Team Coordinator reviews the train and if confirmed sends an email to the load point within three days of the event. The Manager / Superintendent then verifies the exception status, reviews the video footage, takes screen shots, submits an exception report to the EPA and enters the event into EMS.</p> <p>It was reported that no train wagons triggered the requirement for exception reporting to the EPA during the audit period.</p>	<p>Not triggered</p>

Table 3 Drivers Code of Conduct

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 001	<p>Driver Summary Sheet</p> <p>Travel Time</p> <p>Gujarat NRE No 1 Mine: Road haulage of coal is permitted to PKCT between 7am and 10pm Monday to Friday and 8am to 6pm on Saturday and Sunday</p>	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • DCC Internal Audits Worksheets - Bohud – 14/02/2017 • Community Complaints Enquiries Register • Extract of Wollongong Coal RFI system. • PKCT Task Coach & Observation Sheets (F.HS.169) completed 20.06.16, 21.12.16 • Screenshot of Task Observations in Sharepoint system 	<p>Restrictions with the haulage of coal from Wollongong Coal's No 1 Colliery outlined in the DCC have been agreed to by Wollongong Coal.</p> <p>Wollongong Coal heavy haulage induction and Bohud DCC detail these requirements. Wollongong Coal use 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>In addition, Boom gates at Wollongong Coal' site are set to open electronically after 7:00am. As a result loaded trucks are unable to leave the site before this time.</p> <p>An extract of the vehicle tracking system for the period between 05/05/2016 and 26/05/2016 was sighted by the auditors. It showed that haulage movement where compliant with this condition</p> <p>PKCT undertakes Task Observations to assist in monitoring compliance with the DCC. The PKCT Task Coach & Observation Sheet: Drivers Code of Conduct (F.HS.169) was noted to include a check that truck departures are adhering to time restrictions and specifically noting the restrictions related to the Gujarat NRE No 1 Mine (now Wollongong Coal mine). A screenshot of the Task Observations logged in PKCT's Sharepoint system indicated that Task Observations were being undertaken regularly (typically monthly).</p>	Compliant
PKCT Drivers Code of Conduct 002	West Cliff Coal Preparation Plant: Road haulage of coal is permitted to PKCT on a 24 hour 7 day per week basis.	-	Condition does not require assessment	Noted
PKCT Drivers Code of Conduct 003	Dendrobium Coal Preparation Plant: Road haulage of coal is permitted to PKCT on a 24 hour 7 day per week basis.	-	Condition does not require assessment	Noted
PKCT Drivers Code of Conduct 004	<p>PKCT Road Delivery Standards</p> <p>Heavy haulage drivers will observe the following while en route to PKCT or while on the PKCT site:</p>	-	Condition does not require assessment (detailed below)	Noted
PKCT Drivers Code of Conduct 005	Observe all road rules including speed limits	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> 2014 – October 2015 – February, April, August, December 2016 – January, May, August, November 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> ○ Trazblend – 21/02/2017 ○ Bohud – 14/02/2017 ○ Bulktrans – 16/02/20147 • Community Complaints Enquiries Register • Road User Group Meetings 	<p>PKCT undertakes Task Observations to assist in monitoring compliance with the DCC. PKCT Task Coach and Observation Sheet includes an assessment of ltrucks adhering to speed limits. CTO-01532 20/06/2016, CT0-01501 05/05/2016, CTO-01479 26/04/2016 sighted by audit team and showed compliance.</p> <p>This requirement is covered in the Drivers Code of Conduct Monthly Reporting and Internal Audit Worksheet.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to trucks observing road rules.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 006	Limit speed to 50km/hr on Bellambi Lane.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • DCC Internal Audits Worksheets <ul style="list-style-type: none"> ◦ Bohud – 14/02/2017 • Community Complaints Enquiries Register • Extract of Wollongong Coal RFI system. • PKCT Task Coach & Observation Sheets (F.HS.169) completed 26.12.15 and 06.05.16. • Screenshot of Task Observations in Sharepoint system 	<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 & Observation Sheet: Drivers Code of Conduct (F.HS.169) was noted to include a check that trucks adhere 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 completing the reports adequately.</p>	<p>Compliant</p> <p>OFI-2017-15 - 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"> - speed limits on Bellambi Lane, - no compression braking approaching the intersection of Port Kembla Road and Springhill Road and on Masters Road - ensuring tailgates are locked before leaving PKCT - using designated routes to and from site; - limiting noise where possible on Bellambi Lane. <p>OFI-2017-16 - 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 that the audits were undertaken.</p>
PKCT Drivers Code of Conduct 007	Hold a valid driver's licence for the class of vehicle that you operate.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Drivers Code of Conduct Monthly Report: <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • PKCT Summary of Compliance to DCC spreadsheet, 2014 - 2016. 	<p>PKCT Task Coach and Observation Sheet includes driver's licence compliance criteria, although the style of audits (road runner audits and observation of vehicles en-route) do not allow PKCT to check driver's licence validity. The CTO observed did not detail this assessment being completed.</p> <p>Bulktrans utilises a database to track drivers licence information including expiry dates and licence types. In addition, Bulktrans drivers sign off that they are "fit to drive" at the commencement of each shift which includes a declaration that all drivers hold a valid licence.</p> <p>Bohud drivers declare they are 'fit to drive' including holding a valid driver's licence when they sign onto their timesheets at each shift. In addition, driver's licence records are held on file and checked monthly by the OHS representative.</p> <p>Trazblend uses compliance with Trucksafe (an external business and risk management system) to ensure drivers are appropriately licenced.</p> <p>Reporting of compliance to this requirement is part of the Drivers Code of Conduct Monthly Reporting for trucking companies. PTCK keeps track of this with the Summary of Compliance to DCC spreadsheet. The spreadsheet sighted showed compliance with this requirement during the audit period.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 008	Not apply compression brakes approaching the intersection of Port Kembla Road and Springhill Road	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • PKCT Task Coach & Observation Sheets (F.HS.169) completed 26.12.15, 26.04.16 and 06.05.16. • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/2017 • Community Complaints Enquiries Register • Road User Group Meetings 	<p>The PKCT Task Coach and Observation Sheet includes a specific statement and assessment criteria in relation to this condition. Sighted examples of completed Task Observations indicating this was checked and compliant (26.04.16, 06.05.16).</p> <p>In addition, PKCT undertakes an annual audit of each of the transport companies to assess compliance with the DCC. The auditors sighted the audits of Trazblend, Bohud and Bulktrans undertaken in February 2017. The audits were noted to include a check of how the transport companies communicate this requirement to their drivers.</p> <p>The DCC Monthly Report includes details of Noise Minimisation Controls; however no specific reference to Springhill Road is mentioned.</p> <p>One enquiry about truck noise on Port Kembla Road was received by 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 trucks applying compression brakes.</p>	Compliant Refer to OFI-2017-15
PKCT Drivers Code of Conduct 009	Utilise the truck wash at PKCT after tipping.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<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 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>	Compliant OFI-2017-17 - Consider introducing a process for monitoring trucks exiting the truck wash to ensure the effectiveness of the facility.

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 010	Have the load covered from the mine to the PKCT road received area.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<p>PKCT Task Coach and Observation Sheet includes an assessment of load covered while on-route from mine. CTO-01532 20/06/2016, CT0-01501 05/05/2016, CTO-01479 26/04/2016 sighted by audit team and showed compliance.</p> <p>Site observations and interviews of drivers by audit team indicated an understanding that loads are to be covered and not to be uncovered until they have crossed the rail bridge within the PKCT site.</p> <p>This requirement is covered in the Drivers Code of Conduct Monthly Reporting and Internal Audit Worksheet.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to uncovered trucks.</p>	Compliant
PKCT Drivers Code of Conduct 011	Operate the vehicle in a manner that minimises vehicle noise.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<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 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>Compliant</p> <p>OFI- 2017-18 - Include a check of operating vehicles to minimise noise within the Internal Audit Worksheets.</p>
PKCT Drivers Code of Conduct 012	Trucks are to be positioned over the tipping grates before commencing tipping. Any spillage that occurs is to be reported to PKCT to enable efficient cleanup.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 	<p>PKCT Task Coach and Observation Sheet includes an assessment of the position of the vehicle when tipping. CTO-01532 20/06/2016, CT)-01501 05/05/2016, CTO-01479 26/04/2016 sighted by audit team and showed compliance.</p> <p>Site observation and interviews with PKCT personnel indicated that spillages are reported by drivers to the control tower. CCTV also captures any spillages, so the Control Tower can immediately know of spillages.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 013	All trucks are to pass through a truck wash when leaving the client mine and also after tipping at PKCT before leaving the site. Any excess coals that is on the body must be cleaned off on site. The speed through the truck wash is 5km/hr or as slow as possible.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<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, Task Observations 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 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 document 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>	Compliant
PKCT Drivers Code of Conduct 014	Drivers must ensure that following tipping, the tailgate is locked before leaving PKCT.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<p>PKCT Task Coach and Observation Sheet includes an assessment of locking of tailgates. Task Coach and Observation Sheet sighted (CTO-01532 20/06/2016) showed monitoring of this requirement and that it was not being followed in certain circumstances. Task Coach and Observation Sheet CTO-01679 -21/12/2016 showed compliance with the requirement.</p> <p>This requirement is not covered 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 checks that the tailgate is closed / coal cover on.</p> <p>Site observation en-route did not identify any truck that had not adequately locked its tailgate. No complaints or incidents have been recorded by PKCT during the audit period relating to truck tailgates.</p>	Compliant Refer to OFI-2017-15
PKCT Drivers Code of Conduct 015	No queuing is permitted on Springhill Road.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<p>PKCT Task Coach and Observation Sheet includes as assessment of vehicles queuing of Springhill Road. Task Coach and Observation Sheet sighted (CTO-01501 05/05/2016, CTO-01479 26/04/2016) shows compliance with major arterial roads.</p> <p>Notes of Queuing of Springhill Road are included Drivers Code of Conduct Monthly Reporting and Internal Audit Worksheet, with sighted documents indicating compliance. This requirement is included in the driver inductions for Trazblend/ Bulktrans and Bohud.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to truck queuing.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 016	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.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<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 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 non-compliant.</p> <p>No other complaints or incidents have been recorded by PKCT during the audit period relating to trucks using the designated routes.</p>	<p>Non-compliant</p> <p>Low risk</p> <p>Refer to OFI-2017-15</p>
PKCT Drivers Code of Conduct 017	Appin Road - Special care should be taken when crossing Loddon River bridge which is narrow.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015. 	<p>This requirement was included in an earlier version of the DCC (20.02.2009) which was included as Appendix C to the Project Approval. Following consultation with the trucking companies it was removed and is not included in the DCC Version 6 (November 2015) on the basis that Loddon River Bridge was not any narrower than other sections of Appin Road.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to the Loddon River Bridge.</p>	Not triggered
PKCT Drivers Code of Conduct 018	Mt Ousley Rd - In case of a breakdown all vehicles must be towed to the nearest breakdown bay as soon as possible. Breakdowns are to be reported to the RTA TMC.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<p>No complaints or incidents have been recorded by PKCT during the audit period relating to breakdowns on Mount Ousley Road.</p>	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 019	Bellambi Lane - is close to residential receivers, drivers are requested to limit noise wherever possible.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Bohud – 14/02/2017 • Community Complaints Enquiries Register 	<p>It is understood that noise monitors were installed on Bellambi Lane, to monitor excess noise due to community complaints from residences along Bellambi Lane prior to this audit period.</p> <p>Wollongong Coal heavy haulage induction and Bohud DCC 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 Bohud Drivers Code of Conduct Monthly Reporting and Internal Audit Worksheet; however, no specific reference to Bellambi Lane is mentioned.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to Bellambi Lane.</p>	Compliant Refer to OFI-2017-15
PKCT Drivers Code of Conduct 020	Masters Rd - Compression braking on this route should be avoided due to community disturbance.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register 	<p>The PKCT Task Coach and Observation Sheet includes an assessment of avoiding compression braking in residential areas but does not specifically mention Masters Road.</p> <p>Noise Minimisation Controls (compression braking) are included Drivers Code of Conduct Monthly Reporting and Internal Audit Worksheet; however, no specific reference to Master Road is mentioned.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to Masters Road.</p>	Compliant Refer to OFI-2017-15
PKCT Drivers Code of Conduct 021	Springhill Rd - Compression brakes are not to be used on the approach to the lights at Springhill and Port Kembla Road.		Refer above.	Compliant

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 022	PKCT Road Delivery Standards Queuing at the truck receival area is permitted on Tom Thumb Road and Port Kembla Road. No trucks are permitted to queue on Springhill Road.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 • Community Complaints Enquiries Register • Road User Group Meetings 	<p>Adequately covered in DCC Monthly Report and Internal Audit Worksheets. It is noted that Road Runners for Bulktrans undertake daily Behavioural Observations and ensure that trucks are not queuing on Springhill Road.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to truck queuing.</p>	Compliant
PKCT Drivers Code of Conduct 023	Speed limits - Always observe the posted speed limits with speed adjusted appropriately to suit the conditions.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • Community Complaints Enquiries Register 	<p>Adequately covered in DCC Monthly Report. Satellite tracking was being used by Bohud as well as the installation of “geofences” along Bellambi Lane to monitor speed compliance.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to truck speeds.</p>	Compliant
PKCT Drivers Code of Conduct 024	Tipping - Trucks are to be positioned over the tipping grates before commencing tipping. Any spillage that occurs during tipping is to be reported to PKCT to enable efficient cleanup.	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 	Refer PKCT Drivers Code of Conduct 012.	Compliant
PKCT Drivers Code of Conduct 025	Equipment performance - It is the driver's responsibility to report all vehicle faults and it is the owner's responsibility to ensure that the vehicle is maintained to ensure safe vehicle operations.		Not PKCT responsibility. Work order system excludes truck maintenance, though PKCT has an interface with truck and shipping companies, truck companies monitor trucks for necessary maintenance.	N/A

Condition No.	Condition / Requirement	Documentary Evidence	Comment / Finding	Compliance Status & Recommendation
PKCT Drivers Code of Conduct 026	<p>Compliance Monitoring</p> <p>Regular audits of the COC will be carried out to monitor performance, particularly in relation to noise minimisation around PKCT. Audits will be completed of the following activities annually: Speed of trucks, compression braking, truck washing, load covering.</p>	<ul style="list-style-type: none"> • PKCT DCC Version 6 – Nov 2015 • PKCT Implementation Program for DCC Version 6 –Nov 2016 • Drivers Code of Conduct Monthly Report <ul style="list-style-type: none"> - 2014 – October - 2015 – February, April, August, December - 2016 – January, May, August, November - 2017 – February, March • Community Complaints Enquiries Register • Road User Group Quarterly Meetings • Screenshot of Task Observations in Sharepoint system • DCC Internal Audits Worksheets <ul style="list-style-type: none"> - Trazblend – 21/02/2017 - Bohud – 14/02/2017 - Bulktrans – 16/02/20147 	<p>PKCT DCC Implementation Program for the DCC committed to undertaking at least 25 Critical Task Observations annually, quarterly meetings with delivery companies and annual DCC compliance audits of transport companies. The audit monitoring spreadsheet kept by PKCT indicates that PKCT is well exceeding its auditing requirements, as are road transport operators. A screenshot of the Task Observations logged in PKCT's Sharepoint system indicated that Task Observations were being undertaken regularly (typically monthly). The auditors sighted the annual DCC compliance audits of Trazblend, Bohud and Bulktrans undertaken in February 2017. The audit reports were noted to include a check that inductions covered speed limits, compression braking, truck washing and load covering as well as a check on how the DCC is enforced by the transport companies.</p>	Compliant

Table 4 Statement of Commitments

Condition	Requirement	Documentary Evidence	Verification/Comment	Compliance Status & Recommendation
SoC 1	Water Management Reduction in 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, spillage washdown, conveyor sprays. Staged approach to be implemented which will result in a 360 Megalitre per annum reduction by the end of 2010.	2015/16 AEMR	PKCT monitors its water usage across the site on a monthly basis and reports this in the AEMRs. The 2015/16 AEMR indicated the majority of water used on site is recycled water (343.5 ML for the Jul 2015 to June 2016 period) supplemented by 92.6 ML of potable water.	Compliant
SoC 2	Community Relations Continued operation of the PKCT Community Consultative Committee.	2011/12 AEMR. 2012/13 AEMR. 2014 Interim AEMR.	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.	Compliant OFI-2017-19 - Include CCC meeting minutes on the PKCT website
SoC 3	Continued advertisement and operation of the telephone hotline.	PKCT website: www.pkct.com.au	Hotline provided on PKCT website	Compliant
SoC 4	Environmental Monitoring Development and implementation of a management plan which documents the environmental monitoring requirements for PKCT.		Refer DA 08_0009, S4.C1	Compliant
SoC 5	Environmental Management System PKCT will continue to be certified to ISO 14001 and will be externally audited against the certification criteria on an annual basis.	IS14001 certification certificate.	PKCT was re-certified to AS/NZS ISO 14001:2004 (and AS/NZ ISO 9001:2008) on 18 November 2015.	Compliant
SoC 6	Greenhouse Gases PKCT to review onsite electricity use and identify and implement economically viable opportunities for reduced electricity usage.		Refer MCoA 3.17 and review of adequacy of GHG&EE Management Plan in Section 9.0.	Compliant
SoC 7	Landscaping Improve onsite soft landscaping through the planting of trees on the road receival earth bund and along the northern site boundary.		No longer relevant. All landscaping on road receival earth bund and along northern site boundary is complete.	Not triggered
SoC 8	Flora and Fauna Implement Interim Management Plan.		Completed in previous IEA. No longer relevant.	Not triggered
SoC 9	Undertake a GGBF Survey and then develop a Long Term Plan of Management.	GGBF Management Plan 2016.	The GGBF Management Plan was last updated with in November 2016 (Version 8).	Compliant
SoC 10	Waste Minimise waste generated at the site to reduce the volume of waste requiring disposal to landfill.		Refer MCoA 3.19.	Compliant
SoC 11	Prevent dispersal of waste from the site to receiving environments.		Refer MCoA 3.19.	Compliant
SoC 12	Develop a Waste Management Plan for the site.		Refer MCoA 3.19.	Compliant

Condition	Requirement	Documentary Evidence	Verification/Comment	Compliance Status & Recommendation
Soc 13	Traffic and Transport Public road haulage of coal and bulk products to PKCT will not exceed 10 million tonnes per annum.		Refer to DA 08_0009, S2.C6	Compliant
Soc 14	All trucks delivering coal and bulk products to PKCT must follow designated heavy vehicle transport routes.	<ul style="list-style-type: none"> · PKCT DCC Version 6 – Nov 2015 · PKCT Implementation Program for DCC Version 6 –Nov 2016 · Drivers Code of Conduct Monthly Report · Community Complaints Enquiries Register · Road User Group Meetings 	PKCT CTO and DCC monthly reporting audit sheet adequately cover this requirement.	Compliant
Soc 15	A driver's code of conduct will be utilised for all transport companies delivering product to PKCT.	<ul style="list-style-type: none"> · PKCT DCC Version 6 – Nov 2015 · PKCT Implementation Program for DCC Version 6 –Nov 2016 · Drivers Code of Conduct Month Report · Driver spot check as part of audit · Road User Group Meetings 	Records show that the PKCT DCC is utilised by companies delivering to PKCT, with the content integrated into transport companies individual DCC). Discussion with drivers during audit site visit showed they had knowledge of the PKCT DCC.	Compliant
Soc 16	Review effectiveness of truck wash facilities to be undertaken.	<ul style="list-style-type: none"> · PKCT DCC Version 6 – Nov 2015 · PKCT Implementation Program for DCC Version 6 –Nov 2016 · Drivers Code of Conduct Month Report · Audit site visit · Road User Group Meetings 	<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 indicate that trucks were sufficiently clean on exit from the truck wash.</p> <p>Monitoring of effectiveness of truck wash was down 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 was provided on the southern end of the PKCT to 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 document what would be put into place when this is required.</p>	Compliant Refer to OFI-2017-17
Soc 17	Coal truck deliveries along Bellambi Lane to only be undertaken between 7am - 10pm Monday to Friday and 8am - 6pm on Saturday and Sunday.	<ul style="list-style-type: none"> · PKCT DCC Version 6 – Nov 2015 · Drivers Code of Conduct Monthly Report 	Refer to DA 08_0009, S2.C7	Compliant

Condition	Requirement	Documentary Evidence	Verification/Comment	Compliance Status & Recommendation
Soc 18	<p>Noise Management</p> <p>Ensure that ongoing compliance is maintained to the New South Wales Industrial Noise Policy.</p>	<ul style="list-style-type: none"> Port Kembla Coal Terminal Noise Assessment of Site Activities and Road Haulage, Wilkinson Murray, July 2008. Appendix K to Environmental Assessment, Cardno Forbes Rigby September 2008 07355-NM-9 Noise Monitoring July 2014 VerA_FINAL 07355-NM-10 Noise Monitoring December 2014 VerA_JM_Final Report 07355-NM-11 Noise Monitoring June 2015 VerA_JM 07355-NM-12 Noise Monitoring December 2015 VerA 07355-NM-13 Noise Monitoring_VerA_April 2016 Annual Environmental Management Reports 2015 – 2016 1415 AEMR_PKCT_FINAL 1516 AEMR_PKCT_FINAL 	<p>The noise limits provided in the EPL and MCoA were compiled in accordance with the NSW Industrial Noise Policy. Monitoring to date has indicated compliance with these criteria. Criteria was not included for sleep disturbance ($L_{A1,1 \text{ min}}$).</p> <p>The noise assessment undertaken as part of the Environmental Assessment (Appendix K,) included an assessment of sleep disturbance, given operations were proposed to occur 24 hours, seven days per week. The assessment concluded that the potential of noise events disturbing the sleep of nearby residences as unlikely due to the general background noise levels in the area.</p> <p>It is recommended that if future noise compliance surveys are undertaken, a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of maximum noise levels) should be included as part of the noise compliance. It is noted this was undertaken for the noise assessment undertaken in response to the noise query received in April 2016 (refer DA 08_009, S3.C3). The NMP should be updated to reflect this requirement.</p>	<p>Compliant</p> <p>Refer REC-2017-09</p>
Soc 19	Development and implementation of a noise management plan for the PKCT site.	Noise Management Plan (Version: 8.0)	Refer to DA 08_009, S3.C2	Compliant
Soc 20	<p>Air Quality</p> <p>Installation of two continuous dust monitors to monitor airborne dust emissions.</p>	<ul style="list-style-type: none"> Two continuous monitors are installed and operating. Data observed in the control room. 	Refer to EPL 1625, P1.1.	Compliant
Soc 21	Maintain appropriate dust suppression systems on site to effectively manage dust both on stockpiles and roadways.	<ul style="list-style-type: none"> Truck road wash and automatic sprinkler systems installed. 	<p>Refer to EPL 1625, O3.1 and O3.2.</p> <p>Road watering was observed on the day of the audit in the truck wash area (automatic system) and the road tanker observed operating.</p>	Compliant
Soc 22	<p>PKCT Road Delivery Standards</p> <p>Load covering - All trucks delivering to PKCT are required to have an effective cover on their load for the duration of the trip. The load cover may be removed upon arrival at the PKCT road receipt area.</p>	<ul style="list-style-type: none"> All loads can be observed via the control room camera setup. 	<p>Refer to DA 08_009, Schedule 3, Condition 9.</p> <p>All trucks on the day of the audit arriving on the site were observed to be covered until inside the PKCT unloading area after which covers were removed prior to unloading.</p>	Compliant
Soc 23	Truck Wash - All trucks are to pass through a truck wash when leaving the client mine and also after tipping at PKCT, before leaving the site. Any excess coal that is on the body must be cleaned off on site.	<ul style="list-style-type: none"> Truck wash operation can be observed via the control room camera setup. 	<p>Refer to DA 08_009, Schedule 3, Condition 9.</p> <p>Trucks were observed using the truck wash. Automatic wash is augmented with drivers also cleaning parasitic coal from the trucks prior to entering the automatic wash area.</p>	Compliant



Appendix B

2014 IEA
Recommendation's

Appendix B 2014 IEA Recommendation's

Table 14 2014 IEA - Non-compliant Conditions

#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation
DA 08_0009				
1	3.12	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> • <i>Continue undertaking controlled discharges after rain events.</i> • <i>Undertake sediment testing of sediment within the Settlement Lagoon to assess nutrient loading. Subject to test results, conduct maintenance of settlement lagoon to clear sediment.</i> • <i>Undertake further investigations into algae control options and trial suitable options.</i> • <i>If further control options are exhausted and prove ineffective in lowering pH levels to within EPA-defined limits, engage in consultation with EPA regarding the pH range and associated percentile compliance (noting permissible seasonal fluctuations if necessary).</i> • <i>If necessary and relevant, expand investigations regarding water quality controls and treatment beyond algal controls (e.g. study the receiving environment to determine potential environmental impacts of alkaline water entering this system).</i> • <i>Alternatively, engage in consultation with Sydney Water regarding potential water treatment options prior to the distribution of recycled water to PKCT.</i> 	<p>A number of improvements to the stormwater management system were made during the audit period (refer Section 3.5). As a result of these improvements, there were fewer exceedances of the TSS limits during the audit period.</p> <p>pH limits were removed from the EPL by variation dated 15 September 2014.</p> <p>PKCT completed an algae control trial in the settlement lagoon as part of PRP 13. The PRP was removed from the EPL on the basis that it had been completed. No issues relating to algae were reported during the audit period,</p>	Closed
Environmental Protection Licence 1625				
2,3,4	L1.1, L2.3 & L2.4	<i>Refer to recommendation for CoA 3.12.</i>	As above	Closed

#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation
5	M3.1	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> <i>Install a locked cage at this monitoring site to avoid future tampering, and undertake regular monitoring at this site to verify tampering has not occurred and the device is still functional.</i> 	Locked cages were observed around a number of publicly accessible dust gauges	Closed

Table 15 2014 IEA – Opportunities for Improvement (Compliant Conditions)

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
6	3.13	<p><i>It is recommended that PKCT: - Review and update the WMP at least annually so that the document reflects the current state of operations on site. - In particular, the WMP needs to include most recent EPL discharge criteria and exceedances, reference to new PRPs and investigations/trials undertaken to date.</i></p>	The WMP has been updated annually since the 2014 IEA. The latest version (8.0) was dated 3.11.16.	Closed Refer to recommendations from adequacy review undertaken as part of this IEA
7	3.14	<p><i>It is recommended that PKCT: - Review and update the GGBF Management Plan at least annually so that the document reflects the current state of operations on site. If no changes are made to the document, review date at least should be noted on the document to track reviews.</i></p>	The GGBF has been updated annually since the 2014 IEA. The latest version (8.0) was dated 2.11.16.	Closed
8	3.16	<p><i>It is recommended that PKCT: - Review and update the LMP at least annually so that the document reflects the current state of operations on site, including ongoing maintenance of landscaping on site.</i></p>	The LMP has been updated annually since the 2014 IEA. The latest version (10.0) was dated 11.11.16.	Closed

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
9	3.18	<i>It is recommended that PKCT: - Review and update the GGEE Management Plan at least annually so that the document reflects the current state of operation on site. - In particular, the GGEE needs to include reference to the most recent relevant legislation, NGERs data and a summary of information gathered through the ESAPs.</i>	The GGEE has been updated annually since the 2014 IEA. The latest version (9.0) was dated 14.12.16.	Closed Refer to recommendations from adequacy review undertaken as part of this IEA
10	O4.1	<i>It is recommended that PKCT: Complete, finalise and implement Settlement Lagoon Cleanout Process document. Document/record implementation of document implementation (e.g. staff training and maintenance schedules).</i>	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.	Ongoing OFI-2017-20 – Update the Settlement Lagoon Cleanout Process document

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
11	U1.1	<p><i>It is recommended that PKCT ensure that the following part of the condition is completed by 30 June:</i></p> <p><i>By 30 June 2014 the licensee must carry out a review of the environmental performance of the Northern Truck Wash, and provide a written report describing the review to the EPA. This report must include information on how the issues identified in the PKCT Northern Truck Wash Review as per requirements in EPL 1625 PRP NO.10 Port Kembla Coal Terminal July 2011' and the EPA letter to the licensee dated 16 August 2011 have been addressed. In particular the review must include, but not be limited to, how the following key elements have been addressed:</i></p> <ul style="list-style-type: none"> <i>• water treatment</i> <i>• spray pressure</i> <i>• spray volume</i> <i>• spray orientation</i> <i>• spray drift</i> <i>• vehicle speed</i> <i>• truckwash management</i> <i>• truckwash maintenance</i> <i>• truck wash auditing, and</i> <i>• water/dust carryover.</i> 	PRP 11 relating to the northern truck wash was completed in February 2015 and removed from the EPL	Closed

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
12	Continued operation of the PKCT Community Consultative Committee.	<p><i>It is recommended that PKCT:</i></p> <p><i>Include details of community consultative committee (CCC) on the PKCT website for the purposes of better informing the community about the CCC's meetings and actions.</i></p>	The PKCT website includes a link to the CCC Terms of Reference. However it does not include any other details.	Closed Refer OFI-2017-19
13 & 14	O3.1 O3.2	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> · <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> <p><i>Review the train receival system to ensure all reasonable and feasible measures are employed to prevent or minimise dust impacts beyond the rail loop.</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>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>	Ongoing

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
15	3.6	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> <i>Review and update the Implementation Program for the DCC at least annually, so that the document reflects the current state of operations on site.</i> <p><i>Update the Implementation Program for the DCC to strengthen and specify PKCT's disciplinary process in instances of non-conformances.</i></p>	<p>The DCC Implementation Program has been reviewed annually since the 2014 IEA. The latest version (6.0) was dated 6.12.16.</p> <p>Section 4.5.1 now includes discussion of how PKCT deals with non-conformances with the DCC.</p>	Closed
16	DCC	<p><i>It is recommended that PKCT: - Include in monthly reporting template an opportunity for road transport providers to confirm that all drivers hold valid licences for the reporting period.</i></p>	<p>The DCC Monthly Report template was updated to include a check of drivers licences.</p>	Closed
17, 20, 22, 23, 24, 25, 26, 27	DCC	<p><i>It is recommended that PKCT: - Stipulate to relevant road road transport providers that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.</i></p>	<p>The Driver Audit Forms were updated with individual road transport providers.</p>	Closed
18, 21, 29	DCC	<p><i>It is recommended that PKCT: - Update DCC at least annually to ensure the document accurately reflects current operations and requirements. - Specifically update the DCC to include changed truckwash operations as a result of the upgrade. - Update the CTO to include specific criteria regarding the new truckwash (e.g. stops on signals, travels through truckwash at no more than 5km/hr etc.)</i></p>	<p>The DCC Implementation Program has been reviewed annually since the 2014 IEA. The latest version (6.0) was dated 6.12.16.</p> <p>The CTO was updated to include specific criteria regarding the truckwash.</p>	Closed
19	DCC	<p><i>It is recommended that PKCT: - Pass on recommendations to Bulktrans to complete audit forms in a thorough manner, including all criteria relevant at the time of the audit.</i></p>	<p>It was reported that Bulktrans was reminded to complete the forms in a thorough manner. Refer also to #DCC 006</p>	Closed Refer OFI-2017-16

#	Condition #	2014 IEA Opportunity for Improvement	2017 Update – Assessment by AECOM	Status of Recommendation
28	DCC	<p><i>Update the Noise Management and Monitoring Plan to include discussion regarding the limitations posed by, and appropriateness of using the Barn Owl Noise Monitoring System.</i></p> <p><i>Conduct further analysis of the measurement results to verify whether the limitations of the Barn Owl system do not adversely impact the findings of the report.</i></p>	A discussion of the suitability and limitations of the BarnOwl noise monitoring system has been included in Appendix B of the revised NMP	Closed
30	R1.5	<p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> · <i>Keep records of lodgement of Annual Returns for documentation and quality assurance purposes.</i> 	Records of the lodgement of the Annual Returns are maintained on the EPA website. Copies of the 2014 / 2015, 2015 / 2016 Annual Returns were available.	Closed



Appendix C

Audit Team DP&E
Approval