



# Environmental Management Strategy



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## 1. INTRODUCTION

### 1.1 Purpose

The purpose of this document is to outline Port Kembla Coal Terminal's Environmental Management Strategy for site operations in accordance with the Department of Planning approval 08\_0009.

### 1.2 Scope and Context

This strategy applies to PKCT's site operations described as "the Project" in DoP approval 08\_0009.

The strategy and associated management processes are integral to and form part of PKCT's business management system.

### 1.3 Background

Port Kembla Coal Terminal (PKCT) is located on Lots 2, 200, 2005 and 2006 in DP 1030233 on the northern side of the Inner Harbour of Port Kembla, near Wollongong (see **Figure 1**). PKCT land is owned by the Port Kembla Port Corporation (PKPC) and is leased to PKCT under a 20 year, plus 20 year option. PKCT is currently in the process of executing this option which will take the lease period to 2030.

PKCT is owned by six shareholders, namely BHP Billiton Illawarra Coal (BHPBIC), Xstrata Coal, Centennial Coal, Tahmoor Coal, Peabody and Gujarat NRE. BHPBIC has managed the Terminal since 1990. PKCT is the major coal intermodal facility in southern NSW for the transfer of coal from rail and road to ship.

PKCT is responsible for receiving, assembling and loading coal from the Southern and Western New South Wales coalfields, for transport by ship to international and domestic markets. PKCT has two bulk handling facilities; a high capacity Coal Berth that handles the loading of coal, and a Bulk Products Berth that loads a range of bulk products (Refer to **Figure 2**).

The coal terminal has been operational on this site since the early 1980s (Coal Berth). PKCT obtained the lease to operate the facility in August 1990, initially in accordance with a 1979 development consent from Wollongong City Council, and holds Department of Environment, Climate Change and Water Environmental Protection Licence (EPL) number 1625.

In 2008, PKCT commenced preparation of a Major Project application under Part 3A of the Environmental Planning & Assessment Act (EPAA) 1979 seeking consent to increase road receival hours and the amount of coal receival.

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Consultation with the Department of Planning (DoP) resulted in the scope of the application being increased to include consent for PKCT's existing operations.

The Environmental Assessment (EA) submitted with the Major Project Application includes an assessment of all environmental impacts associated with the current and ongoing PKCT activities.

In June 2009, the DoP approved PKCT's Major Project Application (08\_0009) for Existing Operations & Increased Road Receiving Hours. This consent replaces the previous development approval from Wollongong City Council and sets new conditions for environmental impacts, management and reporting.

PKCT have been successfully managing environmental impacts from its onsite activities since commencement of operations and has been gradually improving to mitigate impacts over time through measures such as:

- Improved water spraying of coal stockpiles to reduce dust escape
- Improvements to the surface water capture and treatment process
- Use of recycled water to reduce potable water use
- Improved dust monitoring to identify dust generation causes
- Improved weather monitoring equipment to warn of high wind events to reduce effect on dust escape

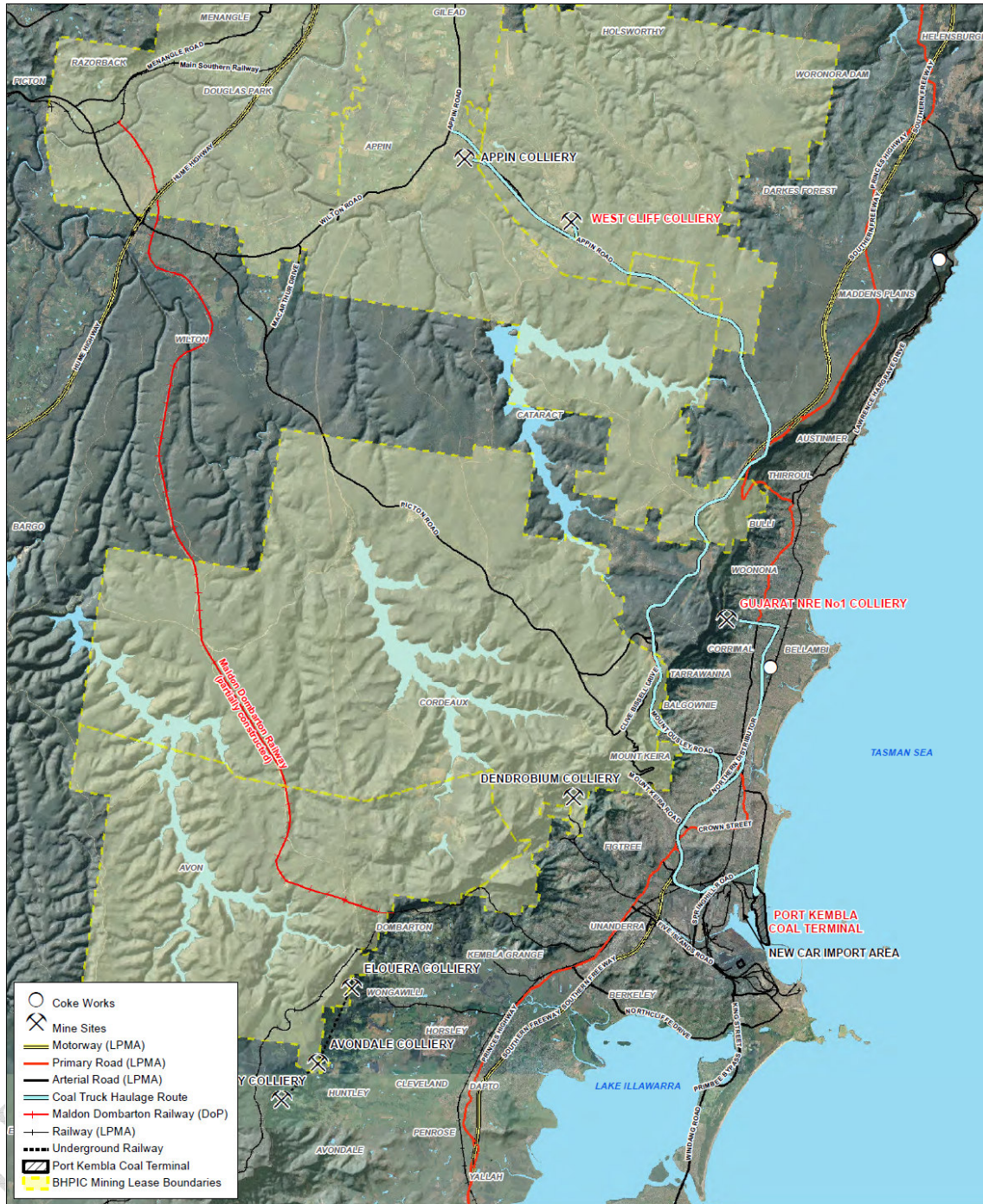
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**Figure 1 – PKCT Regional Context**



### Regional Context

FIGURE 1

Scale 1:120,000 (at A3)

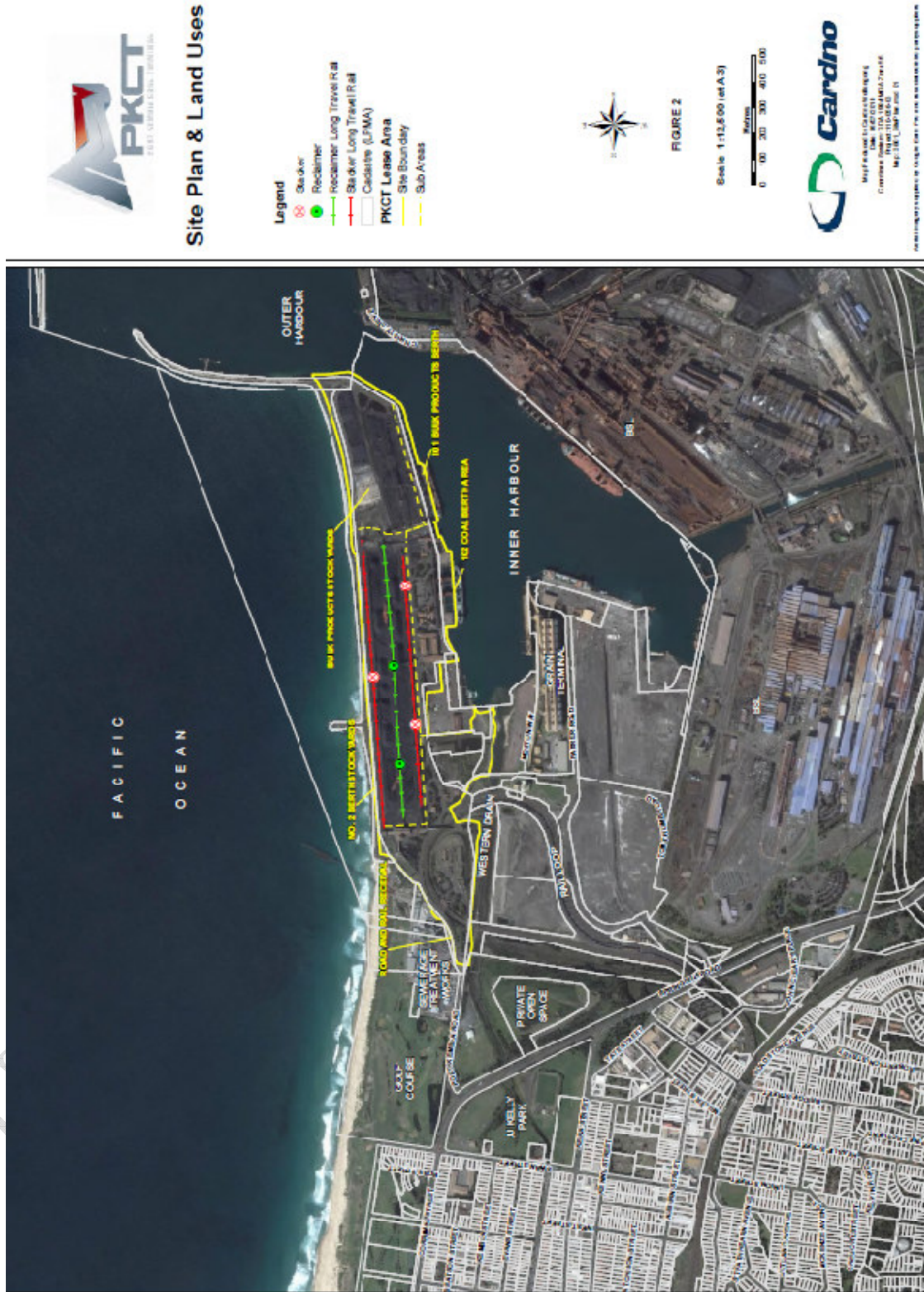
Map Produced by Cardno Wollongong  
Date: 16/07/2010  
Coordinate System: GDA 1994 MGA Zone 56  
Project: 110-056-03  
Map: 3802\_RegionalContext.mxd 01

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Figure 2 – PKCT Local Context





**2. OBJECTIVES**

The objectives of this Environment Management Strategy (EMS) are the following:

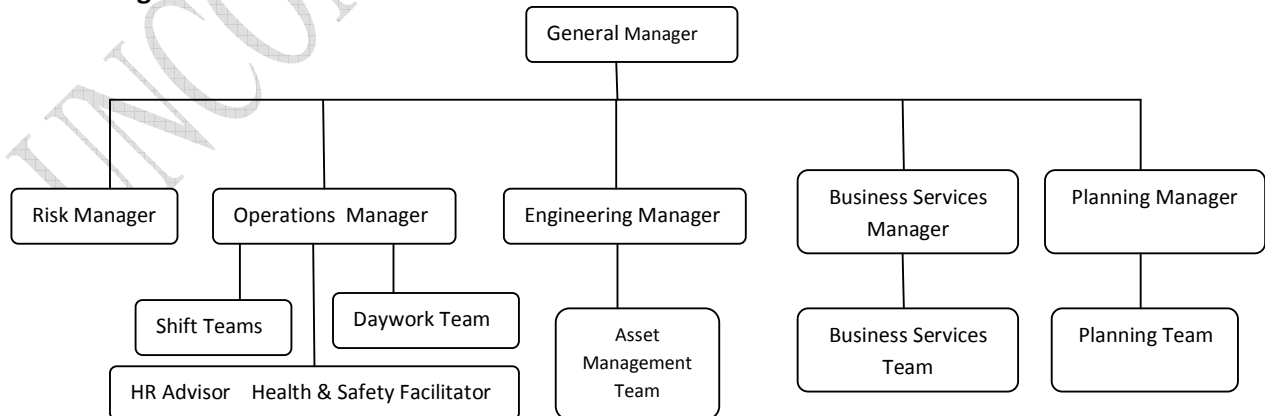
- Provide the strategic context to PKCT’s environment management process.
- Outline the statutory and other requirements applicable to PKCT’s environmental management.
- Describe PKCT’s environmental management system, means by which environmental aspects are managed, effectiveness reviewed and improvement actions identified.
- Describe the communication and reporting processes in place for community and regulators.
- Describe process for managing stakeholders complaints.
- Describe PKCT’s event management processes including responding to emergencies, incident investigation, notification and management.
- Outline the environmental monitoring required including those covering Project Approval 08\_0009.
- Define the business context, policies, standards and key responsibilities applicable in operation of PKCT’s business.

**3. REFERENCES**

PKCT website [www.pkct.com.au](http://www.pkct.com.au)  
[PKCT DECCW Environment Protection Licence no. 1625](#)  
 PKCT Policies- Sustainable Development; Environment; Quality (refer [www.pkct.com.au](http://www.pkct.com.au) )  
 BHPB Environment Standard (GLD.009)  
 Department of Planning: Major Project Assessment Report: PKCT Project (MP 08\_0009)  
 June 2009

**4. RESPONSIBILITIES**

**Organisational Structure**







## Responsibilities

Environmental Management at PKCT is the responsibility of all employees and contractors, with the relevant functional managers and the General Manager who has overall responsibility for environmental management on site.

Risk Manager is responsible to the General Manager for the coordination and implementation of this EMS, PKCT's environment management system, community relations and the management of regulatory approvals.

Operations Shift and Daywork teams are responsible to the Operations Manager for site monitoring, cleaning and operation control of environmental control systems.

Asset Management Team is responsible to the Engineering Manager for maintenance, reliability and effective operation of environmental control equipment.

Other responsibilities are also defined herein. Other specific responsibilities are included in respective management plans and procedures.

## 5. STRATEGIC CONTEXT

### 5.1 General

This section describes the strategic context applicable to PKCT's environment management as it applies to the operation of PKCT business in servicing its customers. In providing its service, PKCT adds value within the industry, economically and to the community in general. So that PKCT can provide a sustainable business, consideration needs to be given to customer service requirements together with other stakeholder interests and needs.

PKCT's location within the port precinct and the community in general, its proximity to Wollongong CBD and the potential for impacts on environment and amenity associated with PKCT's operation is noted. Community expectations are high and expected to increase with changes to community demographics associated with residential developments occurring in proximity to PKCT's northern boundary. Standards and regulator requirements are also likely to increase. Strategically, importance for PKCT to effective environmental management, continually improve and deliver the required performance standard is recognised.

### 5.2 Requirement for PKCT

The Illawarra is a unique region situated between an escarpment and coastline, which supports a strong industrial and mining economy. The Illawarra region has several coal



mines with PKCT being the point of export for the Illawarra, Wollondilly and Lithgow region's coal output.

According to the NSW Department of Industry & Investment website:

- "Coal is the single largest export from NSW".
- "The total value of NSW coal exports in 2006-07 was around \$8.1 billion".
- "In 2008-09 the royalty generated by the NSW minerals sector was \$1.28 billion, with coal accounting for approximately 95% of the total".

The Southern Coalfields represent approximately 60% of the total coal exported through PKCT. When combined with the Western Coalfields, it is estimated that the total value of coal exports through PKCT is approximately \$1.2 billion (2006-07).

PKCT is an integral part of Illawarra's and NSW's mining infrastructure. The operation of PKCT results in the company directly employing in order of 100 people. The location of PKCT in Wollongong has an employment and economic flow-on effect for the region. It is estimated that a further 34 contractors are employed on a full-time equivalent basis at PKCT, as well as the multiplier effects into the region.

The aims of the Illawarra Regional Strategy 2006-31 show that the NSW State Government understand the importance of the port of Port Kembla to the economic viability of the Illawarra. The strategy advises that export opportunities presented by the Port and protection of existing and proposed transport corridors to support freight transport can strengthen the region's economy.

The importance of coal export to the NSW economy and state employment shows there is a long-term requirement for this industry to continue and part of achieving this is by having an organised and permanent method to move this coal from land transport modes to ship. PKCT provides this need for the NSW Southern and Western coalfields.

### **5.3 Business Context**

PKCT's Business Management Plan MP.HS.70 describes PKCT's business, the context, principles and system by which it is managed and operated. This EMS forms part of this system.

#### **Business Description:**

- PKCT is a bulk handling facility that handles the receipt, stockpiling, loading and unloading (ships) of coal, coke and other dry bulk materials for shipment.

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- PKCT is an important part of Australia's coal export trade. Servicing the Southern and Western coal fields of NSW, PKCT operates to provide an efficient service that will ensure the long term viability of the district's coal mining industry.
- PKCT seeks to ensure the long term support of the local coal producers by supplementing its operations with the receipt, stockpiling and loading of other bulk materials where viable.

**Vision:** Port Kembla Coal Terminal - a valued link in the global coal supply chain.

**Mission:** is to provide a safe, reliable & cost effective bulk material handling service

**Values:**

- Safety
- *We place safety above all else*
- Integrity
- *We are truthful and sincere in what we do and what we say we will do*
- Respect
- *We treat everyone equally with openness and honesty*
- Accountability
- *We accept responsibility for our actions and our results, and recognise excellence*

**Supporting Policies:** various, including Sustainable Development and Environment Policies which pertain directly to EMS.

**Commitment to Quality & Continual Improvement:** PKCT is certified to AS/NZS ISO 9001:2008 Quality Management Systems and AS/NZS ISO14001:2004 Environment Management System .

**Management Standards:** BHPBilliton HSEC and Environment Group Level Documents

#### 5.4 Surrounding Land Uses

As PKCT is part of the port of Port Kembla, land use surrounding the premises is predominately industrial. A Sydney Water sewage treatment plant and Wollongong Golf Course are located directly to the north of PKCT and the Tasman Sea is located directly to the east.

Port related activities are located to the south and west of PKCT. Inner harbour port users include the Grain Terminal, Bluescope Steel, AAT (car terminal and general cargo).

There are a variety of land uses within 1 km of the PKCT premises in a northerly direction. This area incorporates the closest residential properties and public reserves to PKCT. Specific land uses in this area include:



- JJ Kelly Park – public open space including rugby and football fields
- Wollongong Golf Club – mixture of public and privately owned land
- Sydney Water Sewage Treatment plant
- Private open space – no public access
- Springhill Road - arterial road carrying on average 14,500 vehicles per day
- Tate Street – industrial and commercial buildings
- Wollongong Cemetery
- Swan Street – residential, commercial and industrial buildings
- Keira Street - residential, commercial and industrial buildings.

In addition to showing the PKCT site, Figure 2 shows surrounding land uses.

### 5.5 Customers and Stakeholders

Further to Section 5.3, there are a variety of customer and stakeholder groups with interests in PKCT's operations. Such groups include the following:-

- Community groups
- Shareholders and associated mine operations
- Coal and Bulk Products shippers
- Other port users
- Contactors and service providers
- Regulators and government
- Shipping, pilotage, port services
- Port Authority
- Other ports and coal terminals

In operating PKCT business and determining the service to be provided, consideration needs to be given to customer and stakeholder needs and requirements. In developing strategic plans, it is noted that needs and requirements may vary from group to group, change and ,at times, conflict.

Potential for conflict may take a number of forms e.g. increased operations increase the risk of adverse impacts; increased water use to reduce dust may result in increased water usage.

### 5.6 Environmental Management

Having obtained Department of Planning approval 08\_0009 in June 2009, PKCT's environmental management system has been revised to accommodate the new approval conditions. The DoP approval together with DECCW EPL 1625 are now the primary statutory instruments under which PKCT operates.

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## 6. STATUTORY REQUIREMENTS

### 6.1 Major Project 08\_0009

The purpose of this EMS is to provide an overarching environment management strategy that sets out PKCT's environmental management, monitoring and reporting framework. In accordance with condition 1 in Schedule 2 of Major Project Approval 08\_0009, this EMS provides the required information as shown in **Table 6.1**.

**Table 6.1 – EMS Response to Condition**

| AEMR Consent Condition (Condition 1, Schedule 2)   | EMS Section                           |
|--|---------------------------------------|
| The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:  | N/A                                   |
| (a) be submitted to the Director-General within 12 months of this project approval or otherwise agreed by the Director-General;  | 9.2                                   |
| (b) provide for the strategic context for the environmental management of the project;   | 5                                     |
| (c) identify the statutory requirements that apply to the project;   | 6                                     |
| (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance;</li> <li>• manage cumulative impacts; and</li> <li>• respond to emergencies;</li> </ul> | 11<br>11<br>11.3<br>7.6<br>7.3<br>8.1 |
| (e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval;  | 9                                     |
| (f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and   | 9                                     |
| (g) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.  | 4                                     |

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## 6.2 Environmental Protection Licence 1625

PKCT's EPL 1625 includes all the Department of Environmental, Climate Change & Water environmental requirements. Particular focus is given to the following aspects:-

- Harbour discharges including monitoring requirements
- Dust deposition including monitoring requirements
- Noise criteria including monitoring requirements
- Biodiversity; Green and Golden Bell Frogs
- Complaints

## 6.3 Acts & Regulations

The following Federal Acts is applicable to the PKCT premises and onsite activities:

- Environment Protection & Biodiversity Conservation Act 1999

The following NSW Acts and Regulations are applicable to the PKCT premises and onsite activities:

- National Greenhouse and Energy Reporting Act 2007
- National Greenhouse and Energy Reporting Regulations 2008
- Protection of the Environment Operations Act 1997
- Protection of the Environmental Administration Act 1991
- Waste Avoidance and Resource Recovery Act 2001
- Environmentally Hazardous Chemicals Act 1985
- Environmentally Hazardous Chemicals Regulation 1999
- Environmental Planning & Assessment Act 1979
- Environmental Planning & Assessment Regulation 2000
- Occupation Health & Safety Act 2000
- Occupation Health & Safety Regulation 2001
- Threatened Species Conservation Act 1995
- Coastal Protection Act 1979
- Coastal Protection Regulation 2004

Section 7.2 also outlines PKCT's processes for identifying and evaluating compliance of applicable legal and other requirements and the means for accessing legislation and Australian and other standards.



#### 6.4 Local Environmental Controls

PKCT's premises is within the port of Port Kembla property which has been listed by the Department of Planning Director-General as a State Significant Site. Due to this the port area, including the PKCT premises, is excluded from the Wollongong Local Environmental Plan 2009. Local planning controls such as zoning and land use/development permissibility are specified by the NSW State Environmental Planning Policy (SEPP) (Major Development) 2005.

The Major Development SEPP zones the PKCT premises SP1 Special Activities which has the following land use table:

##### **Zone SP1 Special Activities**

**(1) The objectives of Zone SP1 Special Activities are as follows:**

- (a) to provide for special land uses that are not provided for in other zones,
- (b) to provide for sites with special natural characteristics that are not provided for in other zones,
- (c) to facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land,
- (d) to maximise the use of waterfront areas to accommodate port facilities and industrial, maritime industrial and bulk storage premises that benefit from being located close to port facilities,
- (e) to enable the efficient movement and operation of commercial shipping, and to provide for the efficient handling and distribution of freight from port areas through the provision of transport infrastructure,
- (f) to facilitate development that by its nature or scale requires separation from residential areas and other sensitive land uses,
- (g) to encourage employment opportunities.

**(2) Development for any of the following purposes is permitted without development consent on land within Zone SP1 Special Activities:**

community facilities; environmental facilities; environmental protection works.

**(3) Development for any of the following purposes is permitted only with development consent on land within Zone SP1 Special Activities:**

boat launching ramps; depots; food and drink premises; freight transport facilities; heavy industries; navigation and emergency response facilities; port facilities; roads; transport depots; warehouse or distribution centres.

**(4) Except as otherwise provided by this Part, development is prohibited on land within Zone**

SP1 Special Activities unless it is permitted by subclause (2) or (3).

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Whilst the Major Development SEPP controls the zoning and permissible developments, Wollongong City Council remains as the approval authority unless the proposed works have a capital investment value of \$30 million or greater. In this instance, the DoP is the Director-General under Part 3A of the Environmental Planning & Assessment Act (EPAA) 1979 as so specified by the Major Development SEPP.

Additionally, certain development at the PKCT premises may be permissible under the SEPP (Infrastructure) 2007. In this instance the Port Kembla Port Authority will be the approval authority under Part 5 of the EPAA.

## 7. MANAGEMENT STRATEGIES

### 7.1 Operational Activities and Potential Environmental Issues

PKCT's site operations and associated activities are generally described as follows:-

- Product receipt: truck and train receipt and unloading
- Stockpiling: conveyor transfer of products to stockyard and stockpiling
- Reclaiming and shiploading: conveyor, reclaimer, ship loading operations
- Transportation and shipping: ship movements, tugs, pilotage
- Mobile plant operations- front end loaders, truck loading, unloading
- Equipment maintenance and upgrade- conveyors, plant, services
- Infrastructure maintenance and upgrade- buildings, roads, site works

Potential environmental impacts include vehicular traffic, air emissions, water discharges, electricity and water use, noise and waste generation. Most significant aspect concerning the community is particulate emissions. Neighbouring car terminals have also raised concerns in this regard to particulate fall out from the industrial precinct. Since PKCT has obtained DoP approval 08\_0009, aspects such as truck movements, noise and truck driver behaviour have a heightened community focus.

### 7.2 Environmental Management System

PKCT's environmental management system is integrated in PKCT's overall Business Management System and operates in compliance with the following:-

- (a) AS/NZS ISO 9001:2008 Quality Management Systems
- (b) AS/NZS ISO 14001:2004 Environmental Management Systems
- (c) BHPB Environment Standard GLD.009
- (d) The Environment Management Strategy outlined herein



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The environment management system is documented (PR.HS.84), controlled and supported by management plans and procedures with processes covering:-

- Environmental aspects and impacts
- Planning and objectives
- Legal and other requirements
- Training and competency
- Emergency Management
- Event Management and Investigation
- Customer and Stakeholder Management
- Monitoring, Auditing and Management Review

Further to Section 9 herein, compliance with legal and other requirements is evaluated periodically by responsible PKCT personnel using Tickit Legal Compliance Evaluation system. PKCT personnel have access to legislation in full and in plain English through a web based service which includes communication of updates and changes to environmental and OHS legislation.

PKCT has a number of audit processes to check compliance, assess effectiveness and identify improvement actions. These processes include the following:-

- Site level Critical Task Observations i.e. “mini” audits
- Internal Audit Program (including AS/NZS ISO 1400)
- AS/NZS ISO 14001 external surveillance audit- 6 monthly covering different aspects of PKCT’s EMS.
- BHPB HSEC self assessments and external audits
- DoP Approvals Implementation: triennial external audit

Critical Task Observations are supported by check sheets focusing on different HSEC aspects.

Results of audits and associated corrective actions are tracked by senior management through quarterly Business Management System review meetings.

### 7.3 Environmental Aspects and Impacts

An [Environmental Aspects and Impacts Register](#) is in place listing the various aspects identified as being applicable to PKCT’s operations. Aspects are listed against the associated regulation and include a risk rating and information on associated environmental controls.

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Environmental aspects are supported by management plans and procedures as appropriate. In accordance with DoP 08\_0009 approval, management plans include the following:-

- Fire Management MP.HS.449
- Surface Water Management MP.HS.462
- Waste Management MP.HS.460
- Drivers Code of Conduct Implementation Plan MP.BM.453
- Air Quality Management MP.HS.386
- Noise Management MP.HS.387
- Greenhouse Gas and Energy Management MP.HS.461
- Landscaping Management MP.HS.333
- Biodiversity Management MP.HS.463
- Green and Golden Bell Frogs Management MP.HS.109

Where applicable, consideration shall be given to cumulative impacts where there may be more than one source contributing. This is particularly relevant to aspects such as air quality, noise and traffic. Consideration of cumulative impacts and their management shall be included in respective management plans.

#### **7.4 Environmental Management and Mitigation**

Environmental management of PKCT's operation is through the operation of PKCT's EMS (refer Section 7.2). This includes the operation of associated environmental plant, equipment and facilities.

PKCT's environmental control equipment include the following:-

- Coal Berth Road Receival has road sprays.
- Coal Berth Rail Receival is enclosed within a building. Rail bins have sprays which can be activated if required to minimise dust.
- In loading conveyors are fully enclosed within tunnels and transfer stations.
- Coal Berth Stockyard conveyors and yard machines have wind guards.
- All transfer points are enclosed except for TS6 which has an enclosed chute.
- There are two truck washers at the Coal Berth Road Receival and at Bulk Products Stockyard.

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- Shiploader chutes are designed to discharge within ship's hatches reducing the impact of prevailing winds.
- Variable height stackers minimise drop height and are used to load coal into stockpiles in the Coal Berth Stockyard.
- Coal Berth & Bulk Products Berth- Conveyor sprays located at various locations on receive and ship loading flow paths.
- Bulk Products Berth road hopper bin sprays.
- Water collection and treatment system
- Recycled water system
- Fire detection and suppression facilities
- Waste collection facilities
- Computer control system monitoring equipment status; fault detection
- Air quality monitoring equipment

## 7.5 Management Strategy and Effectiveness

Effectiveness of PKCT's environmental management and associated environmental performance is assessed in various ways and corrective and improvement actions determined at a strategic or operational level, generally as follows:-

- Top/down- strategic review/ external environment assessment.
- Bottom/up- environmental issues identified at an operational level requiring attention and providing an opportunity for improvement.

In evaluating effectiveness, inputs are obtained from various sources including the following:-

- Evaluation of compliance to requirements (Section 7.2 and Section 9)
- Environmental performance monitoring (Section 9)
- Audits, inspections, site observations (Section 7.2)
- Customer and Stakeholder inputs (Section 10.0)
- Community inputs (Section 10.0)
- Networking and benchmarking

Improvement strategies are developed through PKCT's Business Planning process and Capital Works program. Annual Business Plans are developed, implemented and tracked. Annual Business Plans sit within a strategic Business Plan which has a 5 year horizon. External expertise is used where appropriate to identify improvement opportunities. Networking is also undertaken with other coal terminals and within the industry to:

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- Ensure PKCT has up to date knowledge of best methodologies when developing improvement strategies.
- Benchmark environmental with other bulk terminals to check its environmental performance

## 7.6 Non-compliance

The Risk Manager shall be notified under the following circumstances:

- If a situation arises ,whether due to forecast extreme weather conditions, equipment failure, plant malfunction or other events, that PKCT is at risk of causing a pollution incident.
- Any licence breach (actual or suspected).
- If a pollution complaint or observation is received from a member of the community, statutory authority or stakeholder.
- An accident/ mishap occurs resulting in an uncontrolled discharge in air and water ways.

The team co-ordinator ,together with other relevant PKCT personnel, shall investigate notifiable incidents. The Risk Manager shall arrange for a report of any licence breach, including corrective measures taken, for the General Manager and the relevant regulatory authority e.g. DECCW, DoP. For potential licence breaches, the Risk Manager shall assess the circumstances and liaise/report as appropriate. Events and actions shall be recorded and tracked in First Priority, PKCT's event management system.

## 8. Event Management

### 8.1 Emergencies

An Emergency is defined as an event that requires immediate, rapid external medical or other assistance and/or rapid deployment of internal PKCT resources. Such an event may involve actual or potential personal injury, plant and/ or environmental damage.

PKCT has an emergency procedure in place coordinated through the PKCT's Main Control Room which provide a rapid response in case of an emergency. Key steps are as follows:-

- Activation of an emergency siren
- Contact with external emergency services to arrange deployment
- Mobilisation of first aid and support personnel to the accident scene
- Mobilisation of site personnel to rendezvous with emergency services and convey to accident scene

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Emergency procedure is supported by an Emergency Management Plan which may be activated where the emergency is significant and material harm has occurred. Consideration has been given to typical emergency scenarios in preparation of plans and procedures. Training and emergency drills are carried out periodically.

## 8.2 Events and Hazards

Events and hazards observed on site are reportable. Site personnel are encouraged to take action to mitigate harm and prevent harm from occurring. Procedure [Incident Reporting and Investigation](#) PR.HS.124 outlines PKCT's process. Investigations seek to identify the root cause and key contributing factors so that effective corrective actions can be developed. All events and hazards are entered into PKCT's event management system, First Priority and actions tracked to completion.

## 8.3 Notifications

DoP Approval 08\_0009 and DECCW EPL 1625 set out notification requirements as follows:-

- DoP: Schedule 4- Incident Reporting- Conditions 2,3
- DECCW: EPL breaches

Notification requirements are included in PR.HS.124. PKCT shall notify and report in accordance with these requirements.

## 9. Environmental Monitoring Program

### 9.1 Monitoring Framework

Environmental monitoring required to meet PKCT's environmental regulatory obligations are listed in Table 9.1. Additional monitoring may be undertaken to assess environmental aspects. More details are contained in the reference documents.

Table 9.1

| Aspect              | Description   | Reference document  |
|---------------------|---|---|
| 1. Dust deposition  | Dust deposition gauges- monthly sample/test   | Air Quality Management Plan   |
| 2. Continuous dust  | Continuous dust monitors  | Air Quality Management Plan   |
| 3. Water discharges | Licensed discharge point overflows- daily grab sample<br>Routine pond monthly samples | Surface Water Management Plan   |
| 4. Water usage      | Usage; recycled water, potable  | Surface Water Management Plan<br>Recycled Water Quality Management Plan |
| 5. Recycled water   | Water quality   | Recycled Water Quality Management Plan                                  |

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| Aspect            | Description  | Reference document   |
|-------------------|--|--|
| 6. Electricity    | Usage  | Greenhouse Gas and Energy Management Plan                            |
| 7. Greenhouse gas | Usage; fuels, acetylene; also electricity as above                   | Greenhouse Gas and Energy Management Plan                            |
| 8. Waste          | Quantity and types generated   | Waste Management Plan  |
| 9. Noise          | 6 monthly survey- day/evening/night                                  | Noise Management Plan  |
| 10. Activity      | Road, rail, throughput   | Drivers Code of Conduct Implementation Plan                          |
| 11. Rainfall      | Daily  | Environment Monitoring procedure                                     |
| 12. Pollutants    | Inputs into the National Pollution Inventory                         | Environment Management Strategy                                      |
| 13. GGBF          | Green & Golden Bell frogs (GGBF)- record sightings; periodic surveys | GGBF management Plan   |
| 14. Complaints    | Community complaints   | Customer and Stakeholder Management procedure                        |
| 15. Incidents     | Report, record, investigate incidents, notify where required         | First Priority Event Management system<br>Event Management procedure |
| 16. Cooling Tower | Sample, test, record- water quality parameters; monthly              | Cooling Tower procedure  |

## 9.2 Reporting System

Table 9.2 provides details of the reporting requirements pertaining to PKCT's environmental monitoring listed in Table 9.1.

Table 9.2

| Regulator | Statutory Instrument/ Regulation                          | Report                                      | Due Annually              | Aspects included |
|-----------|---|---|---------------------------|------------------|
| DoP       | Approval 08_0009  | Annual Environment Management Report (AEMR) | 31 <sup>st</sup> July     | 1-15             |
| DECCW     | EPL 1625  | Annual Return                               | 31 <sup>st</sup> May      | 1,3,4,9,11,14,15 |
| DECCW     | Energy Administration (Water and Energy Savings) Act 2005 | Water Savings Plan                          | 31 <sup>st</sup> December | 4                |
| DECCW     | Energy Administration (Water and Energy Savings) Act 2005 | Energy Savings Plan                         | 30 <sup>th</sup> June     | 6                |
| DECCW     | National Environment Protection (National                 | National Pollution Inventory                | 30 <sup>th</sup> Sept.    | 1, 12            |

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|                         |   |   |  |     |
|-------------------------|---|---|--|-----|
|                         | Pollutant Inventory Measure (NPI NEPM)            |   |  |     |
| Wollongong City Council | Public Health (Microbial Control) Regulation 2000 | Hold records on site                        |  | 16  |
| Dept. of Climate Change | National Greenhouse and Energy Reporting Act 2007 | PKCT below threshold; monitor, keep records |  | 6,7 |
| DECCW                   | Threatened Species Conservation Act               | Hold records on site, report sightings      |  | 13  |

Reports shall be provided in the format required by the regulator. Format adopted will provide for ready assessment against the approval conditions or requirements which pertain. The format for the AEMR will follow the Project Approval 08\_0009 documents as follows:-

- Administrative Conditions
- Specific Environmental Conditions
- Environment Management, Reporting, Auditing and Reporting
- Statement of Commitments

In accordance with the AEMR condition in Project Approval 08\_0009, the necessary monitoring results and environmental impact assessments will be summarised into the AEMR based on the specialist work prepared under the direction of the respective Environment Management Plans.

## 10. REVIEW AND IMPROVEMENT

This EMS shall be reviewed at least annually as part of AEMR preparations. This review will consider:-

- The adequacy of the EMS to meet the PKCT environmental management requirements
- Any deficiencies identified during the previous year
- Any complaints that indicate the EMS may need alteration
- Any non-compliance with PKCT environmental criteria during the previous year
- Any improvements made during the last review
- Results of monitoring programs
- Input from stakeholders
- Achievement of environmental criteria.

Any alterations made to this EMS will be communicated to relevant PKCT staff and stakeholders.

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## 11. STAKEHOLDER MANAGEMENT

### 11.1 Networking and Stakeholder Relations

Further to Section 5.5, PKCT shall proactively manage stakeholder relations to be conversant with needs and expectations. This will assist in day to day operations but also strategic planning. Key focus areas are as follows:-

- Maintain a Community Engagement Plan including the following:-
  - PKCT Community Consultative Committee
  - Participate in environmental groups where appropriate
  - Undertake community surveys
  - Provide information through web site and through newsletters
  - Maintain Community hotline
- Participate in port user forums
- Maintain effective communications with regulators and meet requirements
- Maintain customer networks and communications

### 11.2 Complaints and Enquiries

PKCT has a 24 hour, 7 day free call community hotline number (1800 11448) and e mail link i.e. [communitylinks@pkct.com.au](mailto:communitylinks@pkct.com.au) which is advertised on PKCT website (refer [www.pkct.com.au](http://www.pkct.com.au)). This provides a mechanism by which complaints and general enquiries regarding the environment or community issues associated with operational activities can be managed.

PKCT has a Community and Stakeholder Complaints Management process in place which ensures complaints are recorded, registered and investigated. Where appropriate, corrective actions are developed and implemented.

### 11.3 Dispute Resolution

PKCT shall endeavour to resolve issues that are raised or which may occur through constructive communications and seek to address matters based on the facts at hand. Wherever possible, data will be collected to clarify, resolve matters and provide information to the parties concerned.

Consent Condition 14 (Administrative) of DoP Approval 08\_0009 is noted. PKCT will endeavour to resolve matters of disagreement with council, government agency or other Department wherever possible so that the involvement of the Director-General isn't required.





## 12. CONCLUSION

This EMS provides top level direction to the environmental management system for the PKCT operations. This directs the various PKCT management plans and provides the overall structure under which these plans operate.

This EMS meets the requirements of consent condition 1 in Schedule 4 of the PKCT Major Project Approval 08\_0009 by:

- Describing how PKCT undertakes strategic environmental management
- Identifying statutory requirements applying to the PKCT onsite operations
- Describing necessary procedures related to PKCT onsite activities
- Providing an environmental monitoring program to meet PKCT's requirements under their Major Project Approval and Environmental Protection Licence 1625
- Explaining how PKCT integrate their incident and approval reporting into a single system
- Identifying the role, responsibility, authority and accountability of PKCT key environmental personnel.

This EMS is integral to PKCT's business management system and aligns with applicable quality and HSEC standards and environmental policies. EMS will be reviewed annually as specified herein.