Annual Environmental Management Report

1st July 2016 to 30th June 2017

1.0 Title Block

Name of Operation	Port Kembla Coal Terminal Project
Name of Operator	Port Kembla Coal Terminal Ltd
Development consent / project approval #	08_0009
Name of holder of development consent / project approval	Port Kembla Coal Terminal Ltd
Land #	Lot 22 DP 1128396
Name of holder of land lease	NSW Ports (rented from)
Environment Protection Licence #	EPL 1625
Planning Approval start date	12th June 2009
AEMR start date	1st July 2016
AEMR end date	30th June 2017

I, Luke Pascot, certify that this audit report is a true and accurate record of the compliance status of Port Kembla Coal Terminal Ltd for the period 1st July 2016 to 30th June 2017 and that I am authorised to make this statement on behalf of Port Kembla Coal Terminal Ltd.

Note.

a) *The Annual Review is an 'environmental audit' for the purposes of section 122B (2) of the Environmental planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (r provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.*

b) *The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement – maximum penalty 5 years imprisonment); sections 307A, 370B and 307C (False or misleading applications/information/documents – maximum penalty 2 years imprisonment or $22,000, or both.*

Name of authorised reporting officer	Luke Pascot
Title of authorised reporting officer	Environmental Specialist
Signature of authorised reporting officer	
Date	

2.0 STATEMENT OF COMPLIANCE

Figure 1: Statement of compliance

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

Figure 2: Non-compliances

Development Approval / Licence	Condition #	Condition description (Summary)	Compliance status	Comment	Where addressed in Annual Review
EPL 1625	M2.2	Air Monitoring Requirements	Non-compliant	Broken/ vandalised depositional dust gauges	Section 8: Environmental Protection Licence
EPL 1625	M2.2	Air Monitoring Requirements	Non-compliant	Short term data loss at continuous dust monitors due to electrical faults	Section 8: Environmental Protection Licence

3.0 INTRODUCTION

3.1 Purpose

The purpose of this Annual Environment Management Report (AEMR) is to provide the Department of Planning and Environment (DP&E) and other stakeholders a report of Port Kembla Coal Terminal's (PKCT's) environmental performance together with actions taken in relation to environmental control and regulatory compliance across the July 2016 to June 2017 reporting period.

3.2 Scope

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

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

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

3.3 Background

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

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

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

Figure 3: PKCT site boundary and surrounding land use

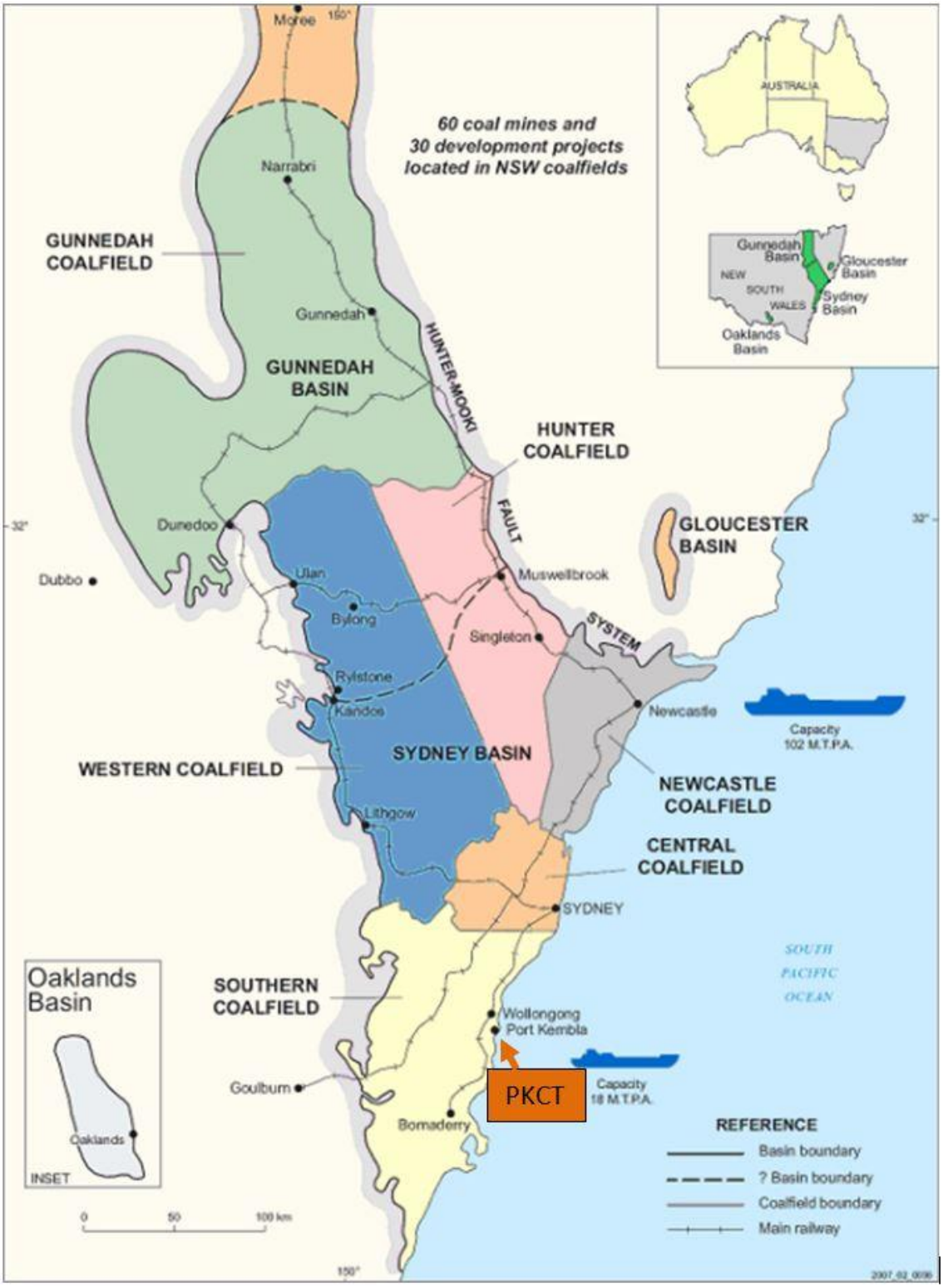


Figure 4: PKCT regional context (source; NSW Department of Planning and Environment Resources and Energy website 2017)

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

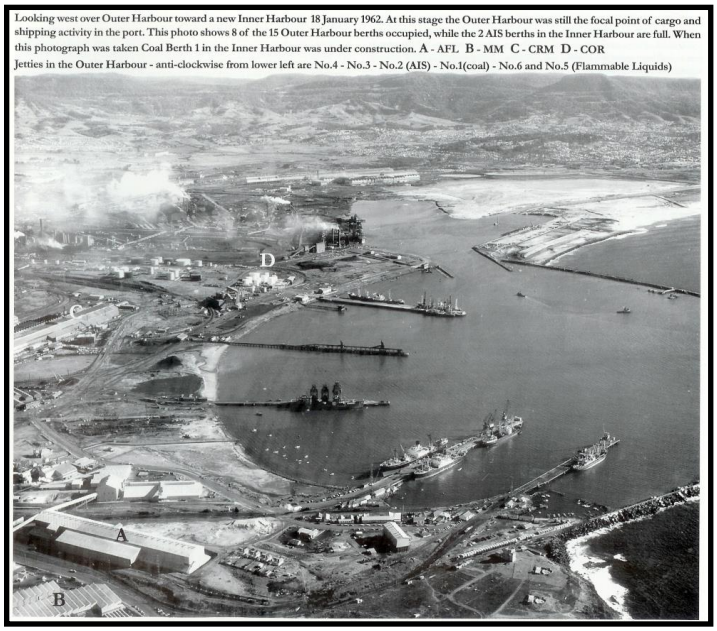


Figure 5: Early image of Port Kembla Inner Harbour. Image referenced from "Roadstead to World Class Port", Port Centenary Committee 1999.

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

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

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

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

3.4 Objectives

The objective of this AEMR is to provide a report that outlines the environmental monitoring, mitigation, assessments and management actions undertaken by PKCT over the July 2016 to June 2017 reporting period.

3.5 Environment Management

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

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

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

3.6 Terminal Contact

Figure 6 below identifies relevant contacts at PKCT.

PKCT Employee & Position	Contact Details
Mr. John Gorman Operations Manager	(02) 4221 1802 John.Gorman@pkct.com.au
Mr. Mark Beale Planning and Risk Superintendent	(02) 4221 1821 Mark.Beale@pkct.com.au
Mr. Luke Pascot Environmental Specialist	(02) 4221 1155 Luke.Pascot@pkct.com.au
Community Hotline	1800 111 448 communitylinks@pkct.com.au

Figure 6: PKCT contacts

3.7 Actions Arising From Previous AEMR Review

The 2015/2016 AEMR was submitted to the DP&E as required on 26th July 2016.

Following a review of the submitted document, the DP&E requested that the next AEMR (2016/2017) be updated to include the items listed in Figure 7 below.

Action Required from Previous AEMR	Requested by	Action taken by PKCT	Where discussed in AEMR
A Map showing the regional context.	DP&E	Added to 2016/2017AEMR	Section 3.3 Background and Figure 4
A summary of any community engagement activities and community contributions undertaken during the reporting period.	DP&E	Added to 2016/2017AEMR	5.12.1 Community Engagement Activities and 5.12.2 Community Contributions
Detail (i.e. subject, timing or location of complaints over the previous reporting periods for the purposes of trend analysis.	DP&E	Added to 2016/2017AEMR	5.12.3 Community Complaints

Figure 7: Actions required from previous AEMR

4.0 ADMINISTRATIVE CONDITIONS

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

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

Figure 8: Administrative conditions

4.1 Obligation to minimize harm to the Environment

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

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

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

4.2 Terms of Approval

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

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

4.3 Limits on Approval

6. The Proponent shall not receive more than 7.5 million tonnes of coal and bulk products at the site by public road in any calendar year without the written approval of the Director-General. In Seeking this approval, the Proponent shall submit a report to the Director-General that:
   (a) reviews the transport related impacts associated with the trucks being used to deliver coal and bulk products to the terminal;
   (b) demonstrates that these impacts are generally consistent with the predicted and/or approved impacts; and
   (c) examines whether there are any other reasonable and feasible measures that could be implemented to minimise these impacts.

   Once this approval has been obtained, the Proponent shall not receive more than 10 million tonnes of coal and bulk products at the site by public road in any calendar year.
7. The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been

dispatched between the hours of:
(a) 7 am to 10 pm Monday to Friday; and
(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.

8. Subject to conditions 6 and 7 of this schedule, coal and bulk products may be received by the Proponent at the site by road delivery twenty four hours per day, seven days per week.

PKCT did not receive more than 7.5 million tonnes of coal and bulk products by public road during the 2015 calendar year.

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

4.4 Management Plans / Monitoring Programs

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

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

4.5 Surrender of Consents

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

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

4.6 Structural Adequacy

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

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

4.7 Demolition

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

In the 2016/2017 reporting period, PKCT began the demolition and removal of PKCT's Reclaimer 2. On 29th June 2017, planned structural pre-weakening and a series of explosive linear cutting charges were used to fell the structure to the ground. The work was undertaken as part of PKCT's Restoration and Compliance Program.

4.8 Operation of Plant & Equipment

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

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

4.9 Dispute Resolution

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

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

There were no disputes during the reporting period.

5.0 SPECIFIC ENVIRONMENTAL CONDITIONS

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

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

Specific Environmental Condition	AEMR Section
Noise	Section 5.1 Noise
Transport	Section 5.2 Transport
Air Quality	Section 5.3 Air Quality
Meteorological Monitoring	Section 5.4 Meteorological

Surface Water	Section 5.5 Surface Water
Biodiversity	Section 5.6 Biodiversity
Visual Amenity	Section 5.7 Visual Amenity
Greenhouse and Energy Efficiency	Section 5.8 Greenhouse and Energy Efficiency
Waste	Section 5.9 Waste
Hazards	Section 5.10 Hazards
Fire Control	Section 5.11 Fire Control

Figure 9: Specific environmental condition overview

5.1 Noise

5.1.1 Noise Standards and Performance Measures

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

Impact Assessment Criteria

1. The Proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the criteria specified in Table 1 for the location nearest to that residence.

Table 1: Noise impact assessment criteria dB(A) LAeq (15 min)

Location	Time Period	Limits($LA_{eq,15\ min}$ dB(A)
Cnr Swan St/Kembla St	Day	51
	Evening	50
	Night	49
Cnr Swan St/ Corrimal St	Day	51
	Evening	50
	Night	49
Cnr Keira St/ Fox St	Day	55
	Evening	49
	Night	45

Notes:

(a) To determine compliance with the $LA_{eq,\ (15\ min)}$ *noise level limits in the above table, noise from the project is to be measured at the most affected point within the residential boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.*

(b) The noise emission limits identified in the above table apply under meteorological conditions of:

- *wind speeds of up to 3 m/s at 10 metres above ground level; or*
- *temperature inversion conditions of up to 3ºC/100m, plus a 2 m/s source-to-receiver component drainage flow wind at 10 metres above ground level for those receivers where applicable*

in accordance with the NSW Industrial Noise Policy.

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

Noise Monitoring Program

2. The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:

(a) be developed in consultation with DECC;

(b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as

otherwise agreed by the Director-General; and

(c) include a:

- 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.

Continuous Improvement

3. The Proponent shall:

(a) continue to implement all reasonable and feasible best practice noise mitigation measures;

(b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and

(c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.

5.1.2 Noise Monitoring

5.1.2.1 Noise Monitoring Methodology

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

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

In August 2016 (within this reporting period), PKCT made a formal request to the Department of Planning and Environment to remove the requirement for biannual noise monitoring with the intent to undertake event based monitoring if noise concerns are raised.

By letter dated 16th March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued. Subsequently, PKCT undertook no noise monitoring surveys across the reporting period.

5.1.2.2 Noise Monitoring Results and Compliance 2016/2017

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

5.1.3 Trends in Noise Emissions

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

5.1.4 Noise –Activities undertaken during 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period relating to noise is presented below. PKCT continues to look for opportunities to improve noise levels across its operations.

- As part of the 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. New yard machines will be brought to site and installation will take place in the next reporting period.

5.1.5 Noise - Activities Planned for 2017/2018 Reporting Period

A summary of the actions proposed to be undertaken in the 2017/2018 reporting period is presented below.

The 2017 Independent audit identified three actions associated with noise. These are;

- Revise the Noise Management Plan to reflect that the annual noise monitoring is no longer required.
- Investigate the hanging metal tubes at the Northern Truckwash to assess whether noise levels associated with them may be problematic and,
- Update the PKCT internal audit worksheet to include a check of operating vehicles to minimise noise.
- PKCT will continue to undertake noise surveys if noise complaints or issues are raised.

5.2 Transport

5.2.1 Transport Standards and Performance Measures

Monitoring of Coal Transport

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

Traffic Management

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

Driver's Code of Conduct

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

5.2.2 Transport Monitoring

5.2.2.1 Transport Monitoring Methodology

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

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

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

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

5.2.2.2 Transport Monitoring Results and Compliance 2016/2017

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

Shiploading July 2016 to June 2017	Coal		Coke	Total
	Coking	Steaming		
Berth 101: Bulk Products Berth (Tonnes)	0	0	0	0
Berth 102: Coal Berth (Tonnes)	6,311,450	1,746,980	0	8058430
			Total (tonnes)	8,058,430

Receivals July 2016 to June 2017	Private Road	Public Road	Total
Road Receival (Tonnes)	2,924,072	2,770,520	5,694,592
Rail Receival (Tonnes)			2,365,879
		Total Tonnes	8,060,471

Figure 10: Summary of PKCT throughput 2016/2017

Across the 2016/2017 reporting period 956 driver observations, 19 audits and 366 Trucksafe audits were completed. Driver observations included monitoring of at least 7,446 individual drivers.

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

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

5.2.3 Trends in Transport

Road receival at PKCT has decreased by approximately 930 thousand tonnes compared to last year with a total of 5,694,591 million tonnes of combined private and public road receivals across 2016/2017, Figure 11.

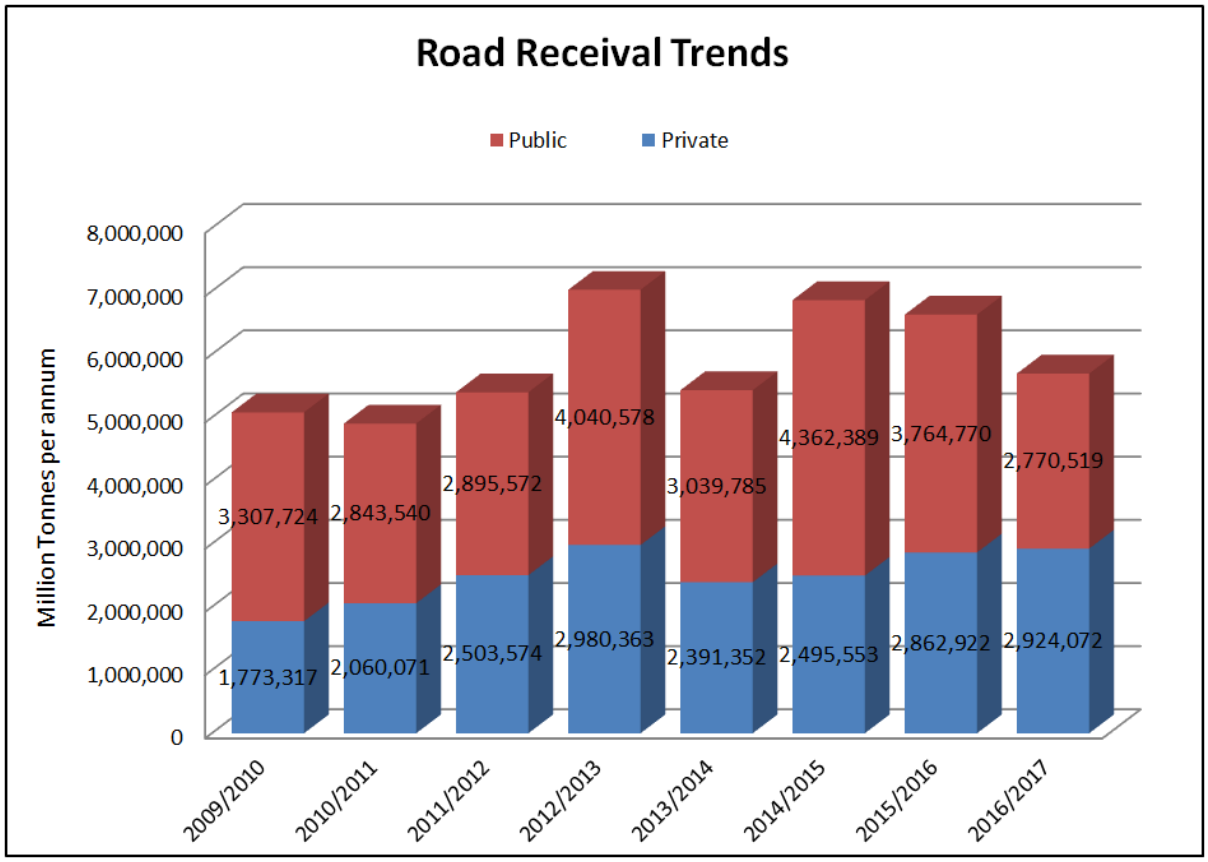


Figure 11: Road receival trends

5.2.4 Traffic –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to traffic is presented below.

- The 2017 Independent External Audit included a review of traffic management and PKCT's Driver's Code of Conduct. The audit identified one low level non-compliance related to a truck parking "off-route" in December 2014 (note: the investigation at of the event at the time was unable to confirm if the truck parking off-route was associated with the PKCT operation). The issue was reported to all truck companies and shippers at the time and the issue was rectified. Some minor updates to the monthly Drivers Code of Conduct reporting template will occur to minimise the likelihood of a similar issue reoccurring in the future.
- Routine task observations and audits have continued, focussing on compliance against the Driver's Code of Conduct and PKCT's approval conditions.

5.2.5 Traffic - Activities Planned for 2017/2018 Reporting Period

A summary of the planned actions for the 2017/2018 reporting period related to Traffic is presented below.

- Continue to monitor the effectiveness of the completed North Truckwash installation by installing an inline turbidity probe at the truckwash. This installation will allow trending of water quality over time and will assist with identifying and rectifying faults at in the system.
- Minor upgrades of the DCC reporting process will be undertaken as recommended in the 2017 Independent External Audit.

5.3 Air Quality

5.3.1 Air Quality Standards and Performance Measures

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

Impact Assessment Criteria

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

Table 3: Long term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Total suspended particulate (TSP) matter	Annual	90 μg/m3
Particulate matter < 10 μm (PM10)	Annual	30 μg/m3

Table 4: Short term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Particulate matter < 10 μm (PM10)	24 hour	50 μg/m3

Table 5: Long term impact assessment criteria for deposited dust

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

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

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

Operations

8. The Proponent shall:
   (a) 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;
   (b) ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and
   (c) where dust is generated by the project, that operations are modified and/or stopped as required to ensure compliance with the relevant air quality criteria

   to the satisfaction of the Director-General.

9. During carrying out of the project, the Proponent shall ensure that:
   (a) all loaded trucks entering or leaving the site have their loads covered; and
   (b) trucks associated with the project pass through a truck wash before entering the public road network

   to the satisfaction of the Director-General.

Air Quality Monitoring Program

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

5.3.2 Air Quality Monitoring and Compliance

5.3.2.1 Air Quality Monitoring Methodology

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

- The AQMP, developed in consultation with the EPA, was submitted to DP&E by the due date of 9th December 2009. The DP&E approved the AQMP by letter of 25th March 2010.
- The EPA assisted in developing the AQMP though did not add any new air quality criteria to EPL 1625. In the 2014 EPL review, the EPA included new obligations on PKCT to report on continuous dust against the DP&E Impact Assessment Criteria and this commenced in the 2014/15 EPL Annual Return.
- PKCT's AQMP contains dust monitoring, assessment, reporting and mitigation and management provisions to ensure necessary actions are undertaken and that dust from

PKCT's premises does not exceed the criteria in the Impact Assessment Criteria outlined above.

- PKCT provides 24/7 site operational control via the Main Control Room (MCR). MCR operators monitor site conditions and weather forecasts. If dust is observed, action is taken through the operation of sprays or other available controls. Dust events observed which emanate beyond the immediate source with a potential to have off site impacts are entered into PKCT's event management system, requiring investigation and corrective action. PKCT also has an auditing process in place which includes site observations of dust, dust associated with truck movements and the assessment of associated controls.

- PKCT has a total of 14 depositional dust gauges (11 Industrial and 3 residential) located on site and on adjacent port and residential areas, and two continuous dust monitors located to the north and south of the site, see Figure 12 below. These locations are specified in the EPL and Project Approval 08_0009. Dust Samples from each dust deposition gauge are collected on a monthly basis by an environmental contractor and sample analysis is performed at a NATA accredited laboratory. Results from the residential depositional gauges are analysed on a monthly basis and compared to the EPA amenity criteria of 4 grams/m²/month. The results are reported on the PKCT website.

PORT KEMBLA COAL TERMINAL
DUST & WEATHER MONITOR LOCATIONS

30th October 2012

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

refer PKCT Environment Protection Licence(EPL) No. 1625 (EPA ID No.)
Dust Gauges- Environment Protection Licence monitoring sites
Sites denoted "P": industrial; "R": residential

Continuous Dust Monitor Sites- additional

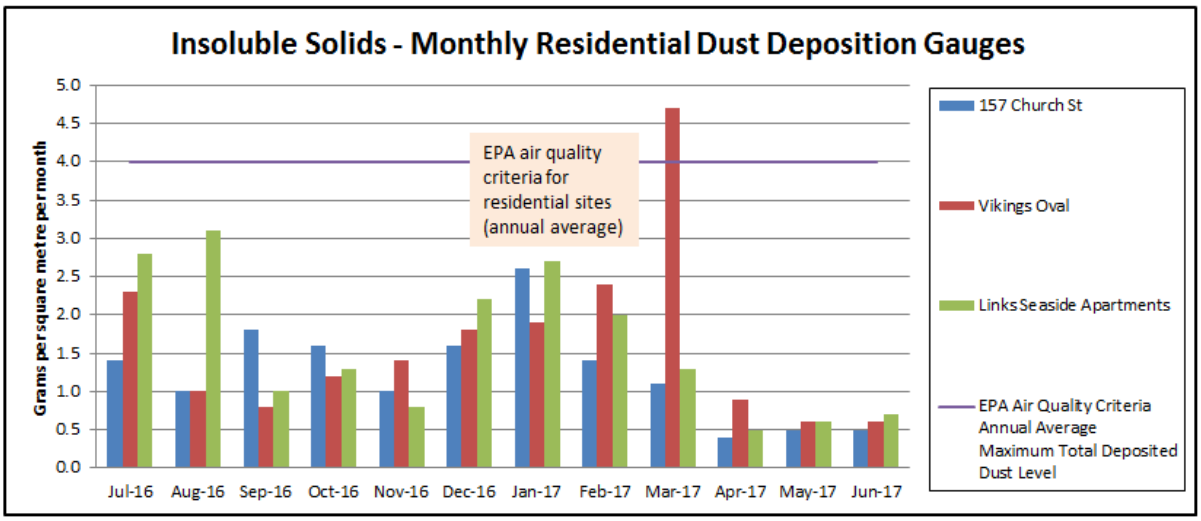
(a) BlueScope High Volume Sampler & dust gauge
(b) PKCT EPL Monitoring Site R2 (2 gauges)

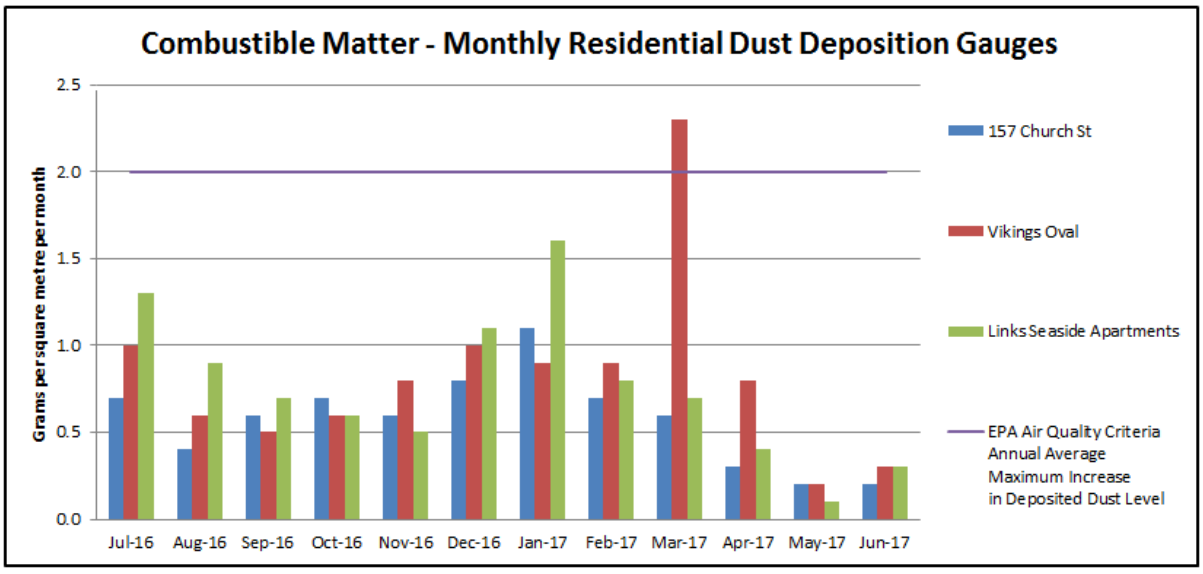
Weather stations
(a) at each continuous dust monitor site
(b) PKCT Main Control Room

Figure 12: PKCT air quality monitoring sites

5.3.2.2 Air Quality Monitoring Results and Compliance 2016/2017

PKCT collects monthly depositional dust records at three residential sites and 11 industrial sites located on or near the PKCT premises. Monthly dust deposition results for the three residential dust gauges are presented in Figure 13 below.





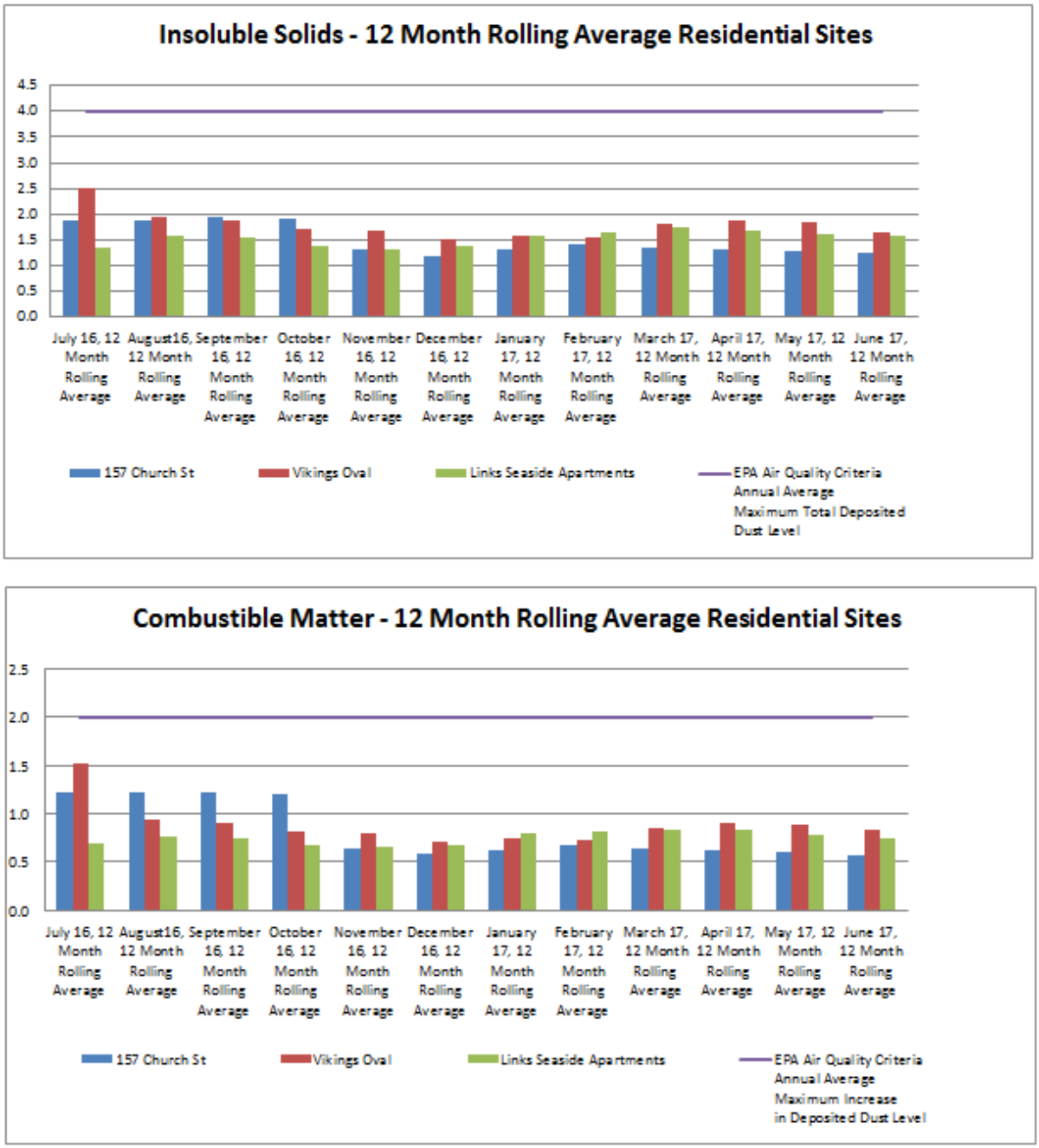


Figure 13: PKCT residential depositional dust gauges

Across the reporting period, there was one month (March – Vikings Oval Gauge) where a residential gauge exceeded the monthly Combustible Matter and Insoluble Solids criteria of 2 Grams/m²/month for that month. In this instance, PKCT undertook additional microscopic analysis of the sample (Job no: Wol17-06069).

The secondary microscopic analysis of the March sample from Vikings oval identified that the sample was comprised of <2% coal, < 10% Insect and Plant Matter and approximately 90% was clay. The analysis confirmed that PKCT was not a contributor to the elevated monthly result.

Twelve month rolling average Insoluble Solids and Combustible matter results for the 11 PKCT industrial dust gauges are presented below in Figure 14 and Figure 15. Results for all but one of the monitoring sites, "P8-North Truckwash", fell within the assessment criteria throughout the reporting period. The annual average results for the P8-North Truckwash site remained above the criteria for much of the reporting period due to a single uncharacteristically high reading recorded in September 2016 skewing the results for the remainder of the 12 month averaging period. While the ultimate dust source was not identified, data recorded at the P8-North Truckwash gauge for the month of September showed that Insoluble Solids were 31% higher than Combustible Matter levels. Combustible Matter is typically understood to be an indicator of coal within a sample.

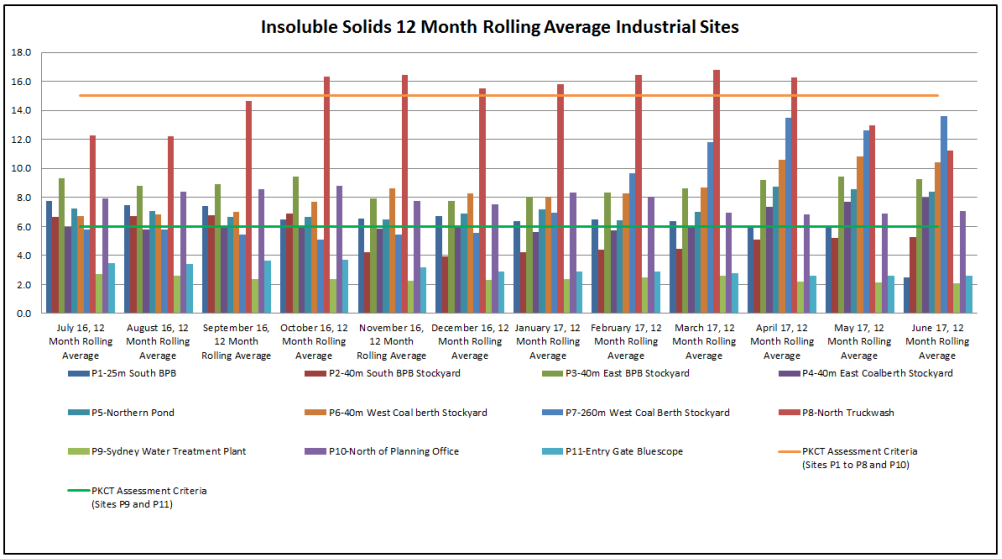


Figure 14: PKCT industrial dust deposition gauges insoluble solids 12 month rolling average.

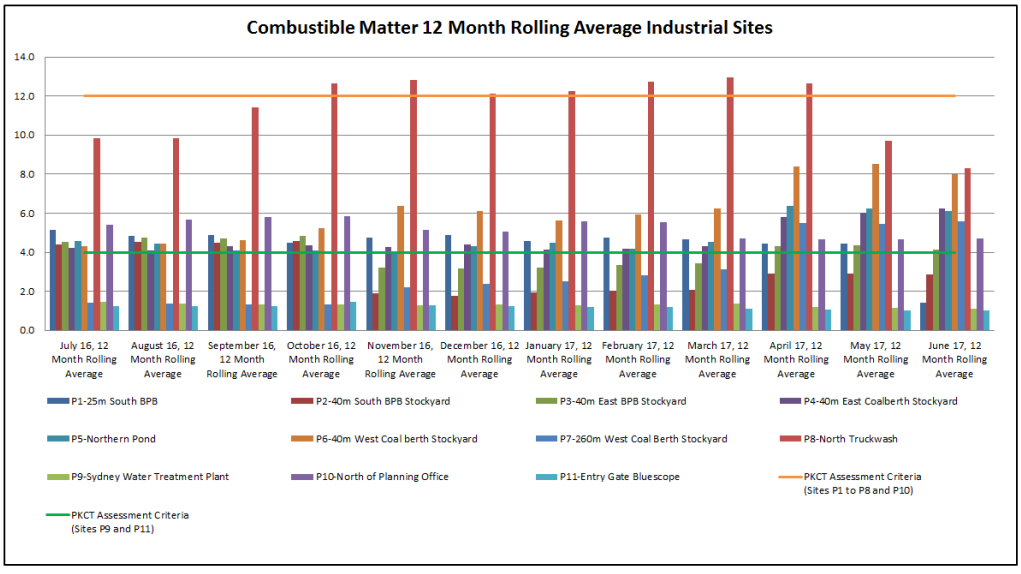


Figure 15: PKCT industrial dust deposition gauges combustible matter 12 month rolling average.

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

The annual average TSP concentration of 40.8 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 90 µg/m³.

The annual average PM10 concentration of 28.1 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 30 µg/m³.

At the northern PKCT monitoring site the trigger level of 90 µg/m³ for the 24-hour average TSP concentration was exceeded on 26 occasions, while the 24-hour average PM10 air quality standard of 50 µg/m³ was exceeded on 43 occasions. Each TSP exceedance day was also a PM10 exceedance day.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to 25 of the 26 exceedances of the 24-hour average TSP trigger level at the PKCT northern monitoring site. PKCT was identified as having made a moderate contribution (30% to 70%) on the remaining exceedance day.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to 42 of the 43 exceedances of the 24-hour average PM10 objective at the PKCT northern monitoring site. PKCT was identified as having made a moderate contribution (30% to 70%) on the remaining exceedance day.

PKCT contribution rating	Number of TSP exceedance days	Number of PM_{10} exceedance days
None	7	14
Minimal (0% to 10%)	13	18
Minor (10% to 30%)	5	10
Moderate (30% to 70%)	1	1
Major (70% to 100%)	0	0
Unclassified (missing data)	0	0
Total exceedance days	**26**	**43**

Figure 16: PKCT contribution ratings for exceedance days during July 2016 to June 2017

On average, PKCT was estimated to have contributed 8% to TSP levels at the PKCT northern monitoring site on days when exceedances of the TSP trigger level occurred.

On average, PKCT was estimated to have contributed 8% to PM10 levels at the PKCT northern monitoring site on days when exceedances of the PM10 standard occurred.

5.3.3 Trends in Air Quality

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

Residential Air Quality Criteria Number of Exceedances - Insoluble Solids							
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017
Links Seaside Apartments	Criteria 4 g/m²/month	0	0	1	0	0	0
Vikings Oval	Criteria 4 g/m²/month	0	2	0	0	1	1
157 Church Street	Criteria 4 g/m²/month	0	0	0	0	1	0

Residential Air Quality Criteria Number of Exceedances -Combustible Matter							
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017
Links Seaside Apartments	Criteria 2 g/m²/month	0	0	0	0	1	0
Vikings Oval	Criteria 2 g/m²/month	0	2	0	0	2	1
157 Church Street	Criteria 2 g/m²/month	0	0	0	0	1	0

Figure 17: Annual residential depositional dust gauge trends

A summary of the 2016/2017 depositional and continuous dust gauge data compared to historical records is presented below in Figure 18.

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

Annual average results for TSP and PM_{10} recorded at the continuous dust gauges are within the relevant DECC guidelines on all occasions except for the PM_{10} annual average in FY2012/2013, and marginally in FY2014/2015 and FY2015/2016, see Figure 18. Both TSP and PM_{10} were within the criteria for the 2016/2017 reporting period. The continuous dust monitors used to record this information cannot discern where the dust source is from, however the data is analysed by a consultant on behalf of PKCT and assesses the likely contribution by PKCT to the results.

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

		FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Location	Standard	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average
Residential Depositional Gauges								
Total Insoluble Solids								
Vikings Oval (d)	4 g/m² month	1.4	1.4	1.6*	1.2	1.1	2.6	1.6
Church Street (d)	4 g/m² month	3.5	1.5	1.3	1.6	1.1	1.8	1.2
Ross Street (d)	4 g/m² month	-	1.6	1.4	1.4	1.1	1.4	1.6
Combustible Matter								
Vikings Oval (d)	2 g/m² month	0.8	0.8	0.8*	0.7	0.8	1.7	0.8
Church Street (d)	2 g/m² month	0.8	0.6	0.6	0.6	0.6	1.2	0.6
Ross Street (d)	2 g/m² month	-	0.8	0.6	0.7	0.6	0.8	0.8
Continuous Dust Monitor								
TSP								
Northern (c)	90 ug/m³	32.2	34	62	44.3	45.8	48.3	40.8
PM10								
Northern (c)	30 ug/m³	25.8	27	47	24.8	30.8	31.6	28.1

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

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

5.3.4 Air Quality –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to Air Quality is presented below.

- PKCT's NC14 conveyor on Berth 102 has historically been a problematic area for coal spillage, which when dry has the potential to generate dust. During the reporting period, PKCT completed installation of the NC14 belt scraper. Effectiveness monitoring following completion of the project found an 85-94% improvement in volume of coal spillage. This improvement has seen a significant improvement in the volume of deposited coal on Berth 102 since installation. See Figure 19 below.

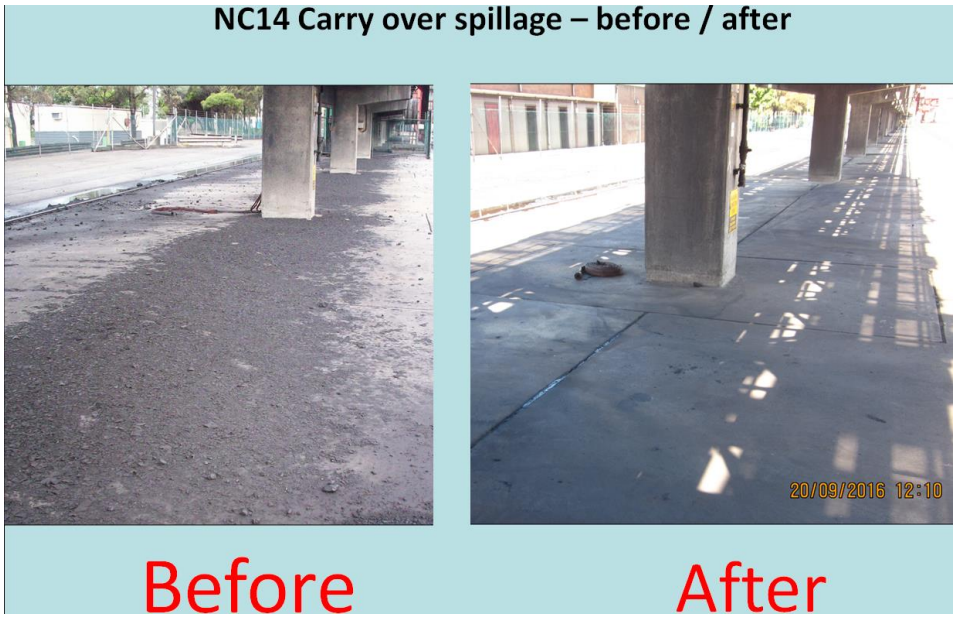


Figure 19: NC14 Belt scraper project before and after images

- In June 2017, PKCT utilised a contractor to seal with bitumen a semi-permanent access road in the southern area of the site. The area was sealed following internal observations of dust generation during high wind events. The area sealed was 20,000m². See Figure 20 below.

Figure 20: Bitumen sealing of southern access road

- PKCT completed and submitted to the EPA two Environmental Improvement Programs, EIP U1"Particulate Matter Control Best Practice Study" and EIP U2 "Use of Real Time Particulate Monitoring Data for Operational Control. The EPA reviewed and closed off EIP U2 in June 2017, while PKCT is still waiting on formal feedback from the EPA on EIP U1 at the time of publication of this AEMR.

5.3.5 Air Quality - Activities Planned for 2017/2018 Reporting Period

A summary of the planned actions during the 2017/2018 reporting period related to air quality is presented below.

- In December 2015, following consultation with the NSW EPA and other NSW coal terminals, PKCT volunteered to participate in an Environmental Improvement Program (EIP) focussing on rail wagon monitoring and reporting. PKCT will continue monitoring incoming trains through to November 2017. Monitoring to date has indicated that incoming trains are conforming to the required criteria.
- PKCT will continue to work on improving the effectiveness of its existing dust mitigation infrastructure and will continue the work already undertaken with expert consultants on this matter.

5.4 Meteorological

5.4.1 Meteorological Monitoring Standards and Performance Measures

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

5.4.2 Meteorological Monitoring

5.4.2.1 Meteorological Monitoring Methodology

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

Additionally, PKCT operates two continuous dust monitors which measure PM10, PM2.5, TSP, wind speed and wind direction.

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

5.4.2.2 Meteorological Monitoring Results and Compliance 2016/2017

A summary of the meteorological data recorded at PKCT across the 2016/2017 reporting period is presented below in Figure 21 and Figure 22. An annual wind summary from the northern and southern continuous dust monitors is presented in Appendix C: PKCT Annual Wind Summary.

Year/Month	Rainfall (mm)	Temperature Mean °C	Wind Max Speed metres/ sec	Wind Average Speed metres/ sec
Jul-16	92.2	14.5	28.8	5.5
Aug-16	69.8	14.7	20.2	5.1
Sep-16	44.6	15.5	28.2	4.1
Oct-16	8.2	17.6	24.0	6.1
Nov-16	41.8	19.4	25.2	5.1
Dec-16	36.0	21.6	23.9	5.0
Jan-17	25.0	22.6	23.5	5.4
Feb-17	162.4	22.5	20.6	5.4
Mar-17	254.6	21.6	25.2	6.1
Apr-17	56.6	18.7	29.9	4.7
May-17	26.8	16.8	18.9	4.6
Jun-17	51.6	14.9	21.3	5.1

Figure 21: PKCT weather station monitoring data 2016/2017

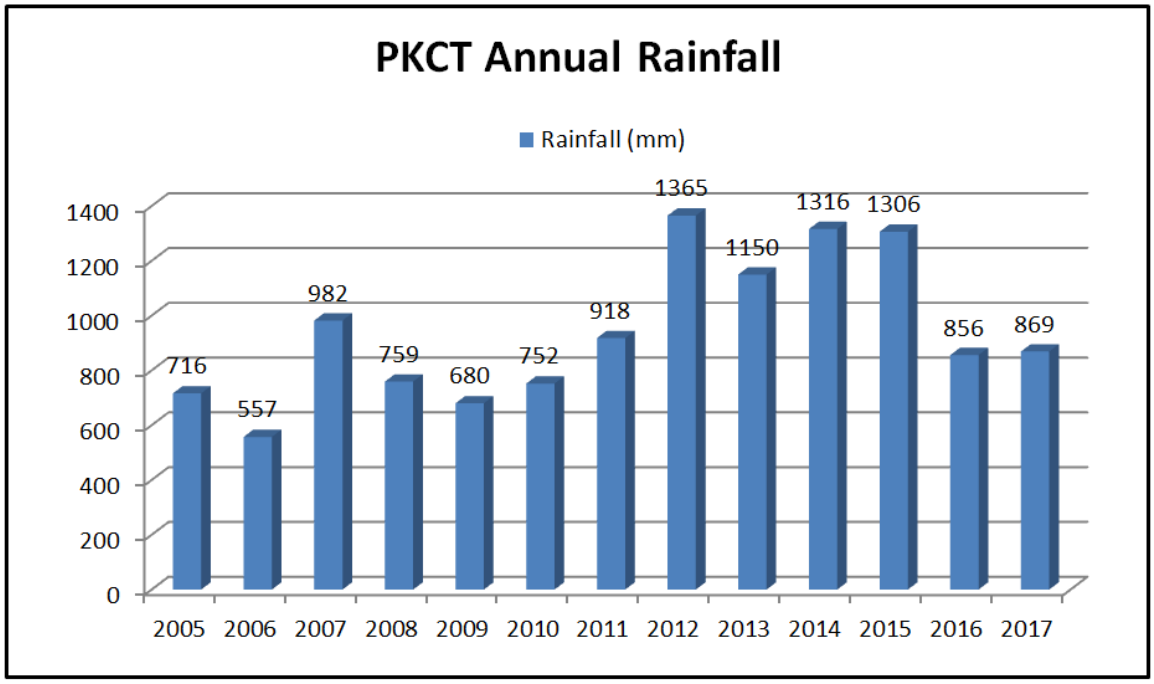


Figure 22: PKCT annual rainfall (financial year)

5.4.3 Trends in Weather

As is shown in Figure 22 above, the 2016/2017 reporting period was considered a dry year with drier "El-Niño" weather patterns dominating. A rainfall total of 869mm for the financial year is similar to last reporting period though significantly less than the period from 2012 through to 2015.

5.5 Surface Water

5.5.1 Surface Water Standards and Performance Measures

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

Discharge Limits

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

Water Management Plan

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

(a) be prepared in consultation with DECC;

(b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and

(c) include:

- a site water balance, which includes details of sources of water supply, on-site water use and management and off-site water discharges and investigates and describes measures to minimise water use by the project;
- a sediment control plan for surface works on the site that is consistent with the requirements of the *Managing Urban Stormwater: Soils and Construction Manual* (Landcom 2004, or its latest version);

- a surface water monitoring program that includes:
  - stormwater effluent discharge criteria;
  - a monitoring protocol for evaluating compliance with the stormwater effluent discharge criteria; and
  - reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met.

5.5.2 Surface Water Monitoring

5.5.2.1 Surface Water Monitoring Methodology

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

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

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

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

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

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

5.5.2.2 Surface Water Monitoring Results 2016/2017

PKCT's revised licence conditions and limits for LDP16 are presented below in Figure 23.

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

Figure 23: EPL 1625 water quality parameter limits and compliance.

Across the FY2016/2017 reporting period, PKCT recorded a total of 54 discharges from LDP16. Of these discharges, 100% were compliant for TSS and 100% were compliant for Oil and Grease. pH was monitored as required, see Figure 24 below. A summary of all LDP16 discharge monitoring data is presented in Appendix D: LDP16 Discharge Data Summary.

Monitoring Parameter	Number of Overflows	Maximum recorded value	Minimum recorded value	Mean recorded value	Compliant Samples (%)
pH	54	9.8	6.9	7.8	n/a
TSS (mg/l)	54	34	<5	13.2	100
Oil and Grease (mg/l)	54	<5	<5	<5	100

Figure 24: Water quality monitoring summary for LDP16 discharges

PKCT monitors water usage across the site on a monthly basis. A summary of the water usage for the site compared to the WSAP is presented below in Figure 25.

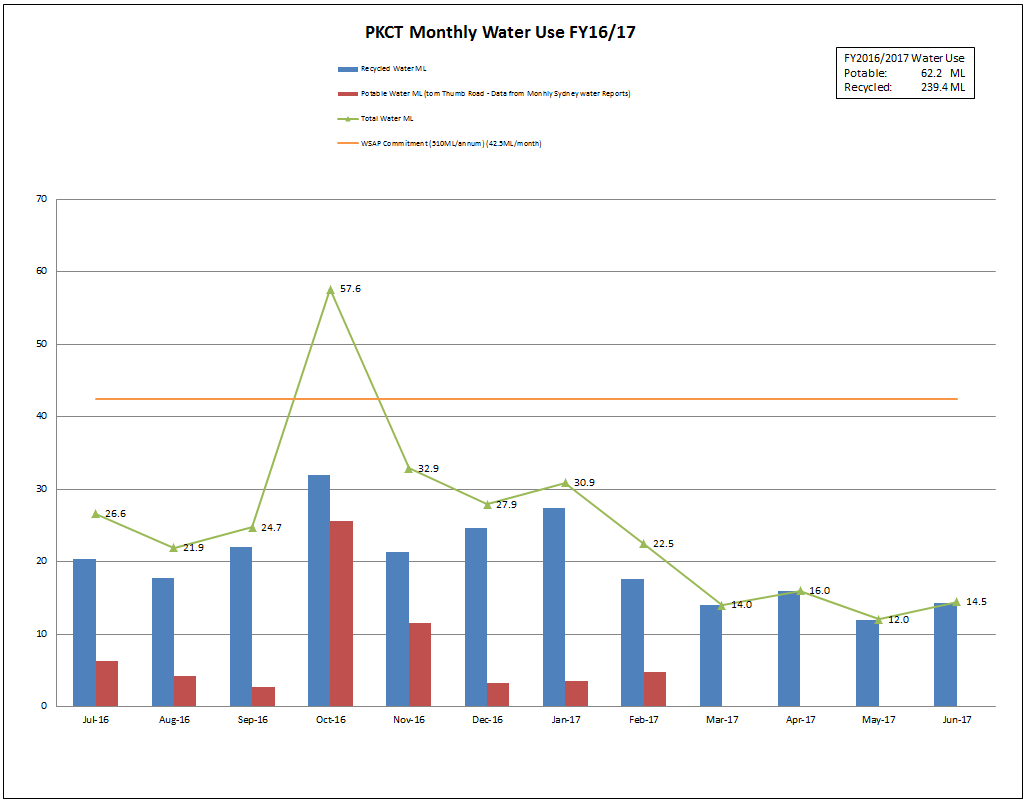


Figure 25: PKCT monthly water use for 2016/2017 reporting period

5.5.2.3 Surface Water Monitoring Compliance

Of the 54 discharges from LDP16 recorded during the 2016/2017 reporting period, PKCT was compliant for 54 (100%) Oil and Grease samples and 54 (100%) TSS samples.

Over the past few reporting periods, PKCT has worked on a number of projects to improve the quality of water at LDP16 including completion of a dredging program in the Settlement Lagoon, upgrading of the Central Pond, installation of transfer pipeline systems enabling water transfer between ponds if required and development of a coagulant dosing system to assist with water clarification. A combination of all these works has enabled PKCT to maintain 100% compliance of discharge water through LDP16 in the 2016/2017 reporting period.

5.5.3 Trends in Surface Water Monitoring

Figure 26 below highlights the trends in compliance measured at LDP16 for EPL 1625 water quality parameters of pH, TSS and Oil and Grease. As is shown in Figure 26, compliance has remained stable at 100% for Oil and Grease and 100% for TSS during this reporting period. pH is now monitoring and reporting only.

Monitoring Parameter	2011/2012		2012/2013		2013/2014		2014/2015		2015/2016		2016/2017	
	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %
pH	97	100	68	96	91	93	143	Reporting only	72	Reporting only	54	Reporting only
TSS (mg/l)		87		91		95		94		100		100
Oil and Grease (mg/l)		98		100		100		100		100		100

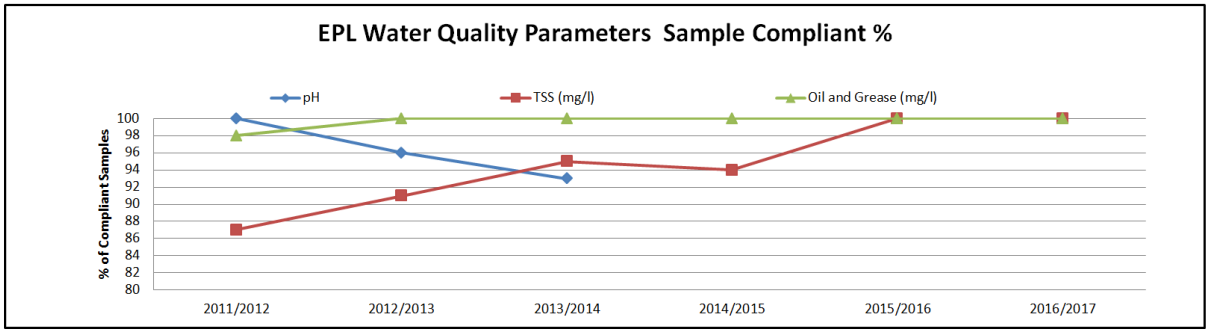


Figure 26: Trends in water EPL water quality data at LDP16

Site water use as a whole has decreased across the 2016/2017 reporting period compared to the 2015/2016 reporting period, see Figure 27 below. Total water used decreased significantly from 436 ML (2015/2016) to 301 ML (2016/2017). Potable water used at PKCT in the 2016/2017 reporting period fell compared to last reporting period. There have been a number of activities across the 2016/2017 reporting period that have led to the decrease in water used at the terminal. These activities include, a staged program to identify and fix leaks across the large pipe network, significantly lower throughput meaning less “coal on the ground” to manage and isolation of the southern portion of the site for Restoration and Compliance works which has effectively sterilised the area for coal or bulk product storage.

Recycled water as a percentage of the total water used has remained stable at 80%.

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

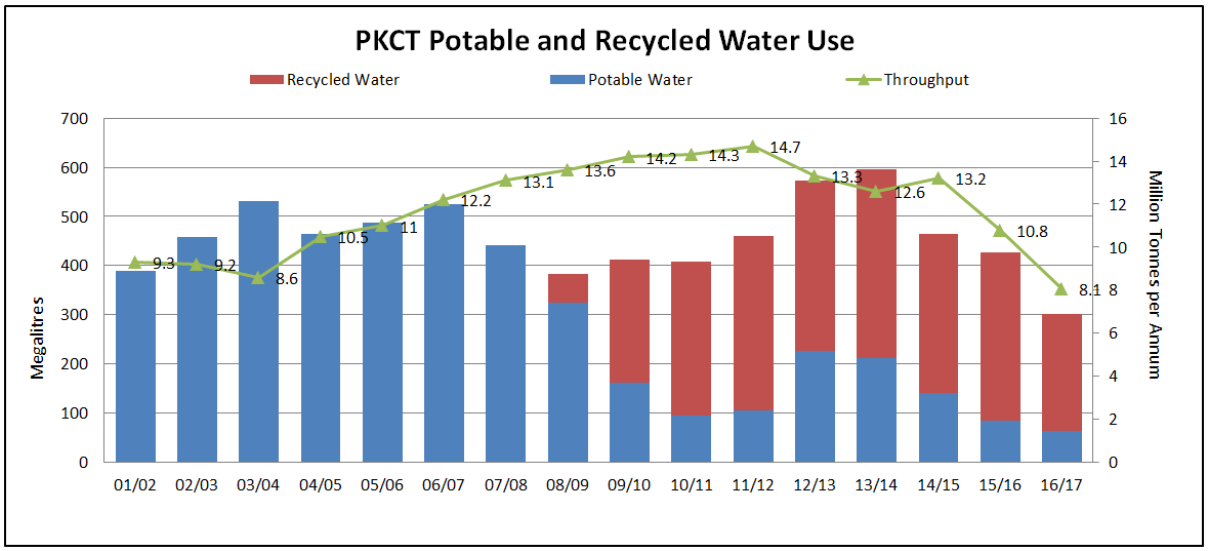


Figure 27: Trends in Potable and Recycled water use at PKCT

5.5.4 Surface Water –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to surface water is presented below.

- Continued sediment removal from the Central Pond and others on an increased frequency has helped to minimise the volume of sediment being transferred across to the Settlement Lagoon which in turn has helped to manage the quality of discharged water through LDP16. See Figure 28 below.

Figure 28: Central Pond cleaning improves water quality that reports downstream to the Settlement Lagoon.

- An effectiveness review of the upgrade works associated with PRP12– "Implement upgrades to stormwater pollution control system" was completed and submitted to the EPA in December 2016. The report found that "improvements made to the Central Pond

have been, overall, effective at improving the terminal's environmental performance and compliance with the conditions of EPL 1625" Following review of the report, the EPA closed off the PRP and removed it from PKCT's licence.

- In June 2017, PKCT completed an upgrade of the electrical systems that control the contaminated water collection system. The upgrades split the contaminated water collection system away from the rest of the site's electrical system which now enables most electrical shuts to be done in isolation and not take down the contaminated water system when they occur.

5.5.5 Surface Water - Activities Planned for 2017/2018 Reporting Period

PKCT has not had any non-compliant discharges from LDP16 across this reporting period. PKCT will continue to utilise the existing tools and measures to ensure non-compliances are avoided.

- PKCT gained funding to implement a revised berth drainage project. The project includes blocking some of the existing drainage holes in the main berth and installing a sump and associated pump system to assist with removal of water build up on the berth. The project will begin in July 2017 and be progressively completed across the 2017/2018 reporting period.
- Continue to identify and implement opportunities for improvement related to surface water at PKCT as they arise.

5.6 Biodiversity

5.6.1 Biodiversity Standards and Performance Measures

Green and Golden Bell Frog Management Plan

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

5.6.2 Biodiversity Monitoring

5.6.2.1 Biodiversity Monitoring, Results and Compliance

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

- Maintenance and monitoring by Wollongong City Council of its Greenhouse Park frog ponds.

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

5.6.3 Trends in Biodiversity

PKCT undertakes GGBF surveys and records all sightings in a register. PKCT personnel have not identified any GGBF during normal operations or as a result of focused surveys since 2011. Figure 29 below shows the trend in GGBF sightings at PKCT back to the 2007/2008 financial year.

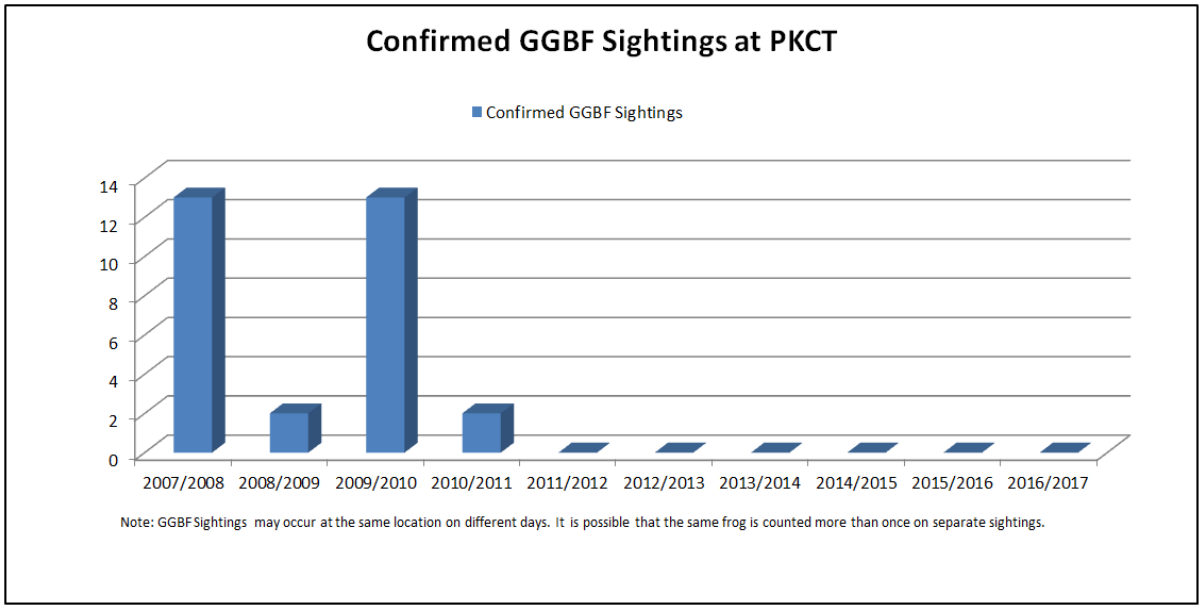


Figure 29: GGBF sightings at PKCT

5.6.4 Biodiversity –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to biodiversity is presented below.

- PKCT undertook a GGBF survey on the 28th February 2017. The survey was supervised by an expert consultant from NICHE Environment and Heritage, with assistance provided by the PKCT Environmental Specialist. The survey confirmed that GGBFs are not currently present on site. The Peron's tree frog and Striped Marsh frog were the only species of frog found on site during the survey and the striped marsh frog was recorded at Greenhouse Park. It was noted that some clearing of vegetation and weeds had been undertaken at the Greenhouse Park frog ponds.
- Workers at PKCT are instructed to report and record any GGBF (or other frog) sightings throughout the year. Any frog sightings are recorded in a site database. No GGBFs were identified by the PKCT site personnel in the 2016/2017 reporting period.

- Based on not sighting any frogs since 2011 and the recommendations of PKCT's specialist consultant, in August 2016 PKCT contacted the DP&E and OEH and requested to discontinue the annual Green and Golden Bellfrog surveys until any frogs are found on the premises. Following consultation with OEH and DPE, PKCT committed to continue to undertake an annual GGBF survey at the premise.

5.6.5 Biodiversity - Activities Planned for 2017/2018 Reporting Period

PKCT will continue to ensure that the biodiversity standards and performance measures are considered during any planning for future restoration and improvement works. A summary of the planned actions for the 2017/2018 reporting period related to biodiversity is presented below.

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

5.7 Visual Amenity

5.7.1 Visual Amenity Standards and Performance Measures

Lighting Emissions

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

    to the satisfaction of the Director-General.

Landscape Management Plan

16. The Proponent shall prepare and implement a Landscape Management Plan to the satisfaction of the Director-General. This Plan must:
    (a) be submitted to the Director-General for approval within 12 months of this approval, or as otherwise agreed by the Director-General; and
    (b) include;
        - details of screening trees to be planted on the road receival earth bund and along the northern site boundary; and
        - an implementation program.

5.7.2 Visual Amenity Monitoring

5.7.2.1 Visual Amenity Monitoring, Results and Compliance.

Lighting - A consultant, Lightpoint Consulting Services, undertook a review of site lighting and assessment against the standard in 2011. A report of 4th October 2011 concluded that

PKCT was in compliance with AS 4282 and no evidence of any detrimental impact was found on residential areas.

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

PKCT is currently undertaking a major restoration and compliance project on site. As part of the project, all new lighting 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.

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

PKCT utilises a landscaping contractor to maintain lawns and gardens and control weeds on site. Landscape contractor staff are trained in chemical application and use non-residual herbicides (Glyphosate 360 – trademark Roundup). All weed spraying undertaken considers prevailing weather conditions and locations and PKCT is provided with a Weed Spraying Notification Form (WSNF) each time an herbicide is used on site. See Appendix E: Weed Spraying Notification Form for an example of a WSNF.

5.7.3 Trends in Visual Amenity

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

Chemical is applied on site to control weeds. Figure 30 below shows the volume of herbicide used on site across respective reporting periods. The 2016/2017 reporting period saw a minimal increase in the volume of neat herbicide used at PKCT. PKCT's landscaping contractor are licenced and utilise glyphosate to manage weeds when weather conditions allow. Wet and windy conditions limit the ability to safely spray chemicals and volumes of herbicide used at the terminal often are governed by weather.

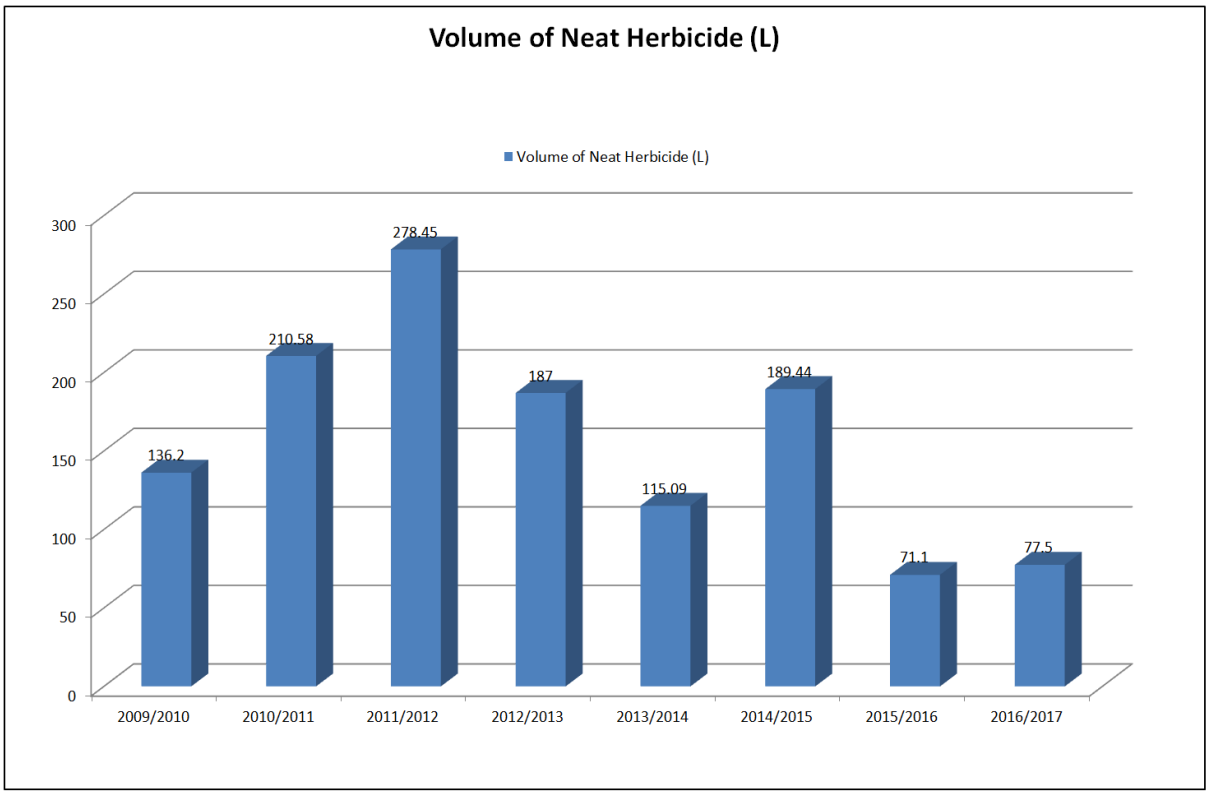


Figure 30: Volume of neat herbicide used for weed spraying at PKCT

5.7.4 Visual Amenity –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to visual amenity is presented below.

- Ongoing maintenance of the landscaped area near the northern transfer station. The garden is now well established in this area, see Figure 31 below.

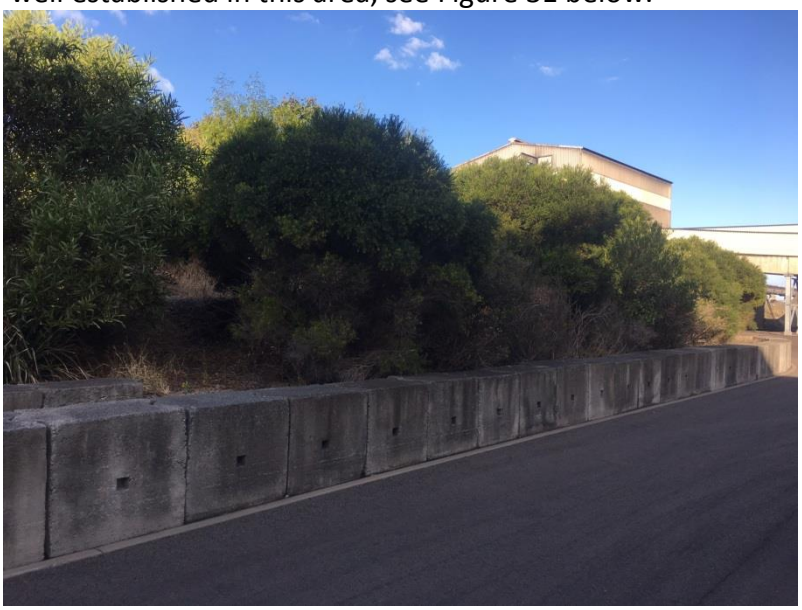


Figure 31: Landscaped area near Northern Transfer Station, June 2017

- Landscaping works were undertaken at the Central Pond following the completion of major structural upgrade works in January 2016. PKCT's Landscaping contractor replanted the surrounds to the ponds with native vegetation including lamandra and leptospermum. See Figure 32 showing progress of landscaping works over the reporting period.

Figure 32: Landscaped area near Central Pond.

- There were no community complaints relating to lighting across the 2016/2017 reporting period.

5.7.5 Visual Amenity - Activities Planned for 2017/2018 Reporting Period

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

- PKCT undertook an annual review and updated where necessary the LMP. This review was completed in November 2016. Only non material updates were made to the LMP.

5.8 Greenhouse and Energy Efficiency

5.8.1 Greenhouse and Energy Efficiency Standards and Performance Measures

Operating Conditions

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

Greenhouse and Energy Efficiency Plan

18. Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:
    (a) be prepared generally in accordance with the *Guidelines for Energy Savings Action Plans* (DEUS 2005, or its latest version);
    (b) be submitted to the Director-General for approval;

(c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;

(d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;

(e) describe how the performance of these measures would be monitored over time; and

(f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.

5.8.2 Greenhouse and Energy Efficiency Monitoring

5.8.2.1 Greenhouse and Energy Efficiency Monitoring Methodology

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

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

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

A consultant was engaged to advise on applicable site activities and energy aspects and to develop a monitoring format. The format developed has been implemented. Though not reporting at this stage, PKCT is recording data and monitoring energy use and greenhouse gas generation. Figure 33 below outlines the volumes of reportable emissions from PKCT operations across the reporting period.

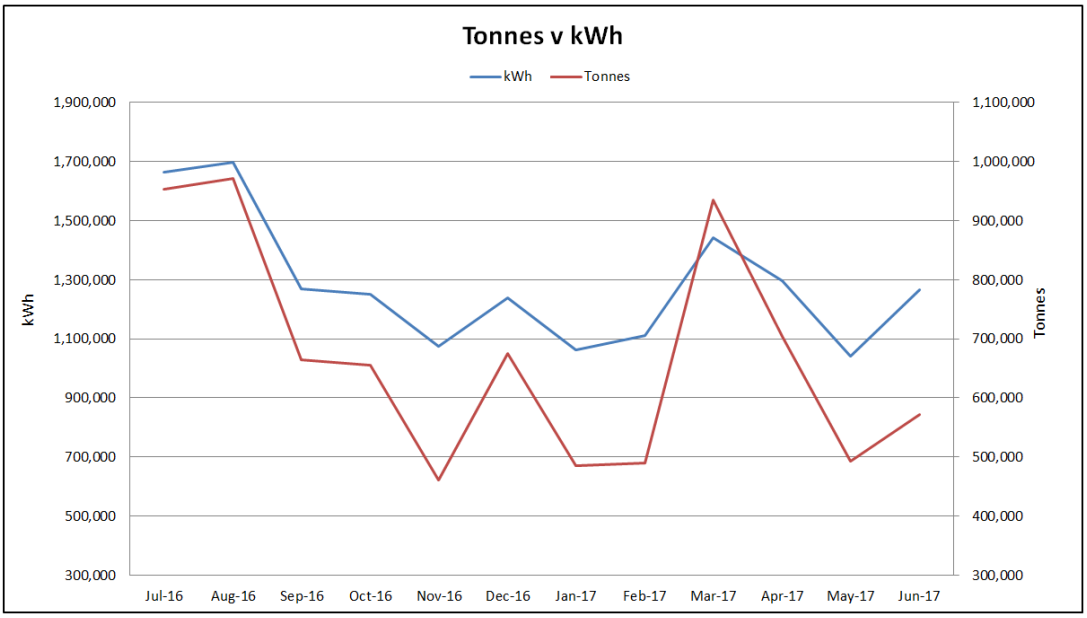
2016/2017 FY (July-June)		A	B	C	D Gigajoules	E tonnes
	Reporting unit	Amount consumed (reporting unit)	Energy content (GJ per reporting unit)	Emissions factor (kg CO2-e per GJ)	Reportable energy (GJ)	Reportable emissions (tonnes CO2-e)
Scope 1 – direct emissions						
Diesel oil(transport)	kL	0	38.60	69.90	0	0
Diesel oil (stationary energy)	kL	0	38.60	69.50	0	0
Biodiesel B20 (Transport)	kL	41	30.88	69.51	1260	88
Petrol (transport)	kL	14	34.20	69.60	473	33
Petroleum based oils	kL	1.84	38.80	27.90	71	2
Petroleum based greases	kL	2.83	38.80	27.90	110	3
Acetylene	m3 *	37	0.0393	51.33	1	0
Scope 2 – indirect emissions						
	Reporting unit		Energy content (GJ per kWh)	Emissions factor (kg CO2-e per kWh)		
Electricity	kWh	15,409,028	0.0036	0.89	55473	13714
Total					57389	13840
Threshold					100,000	25,000

Figure 33: Greenhouse gas report 2016/2017

5.8.2.1 Greenhouse and Energy Efficiency Monitoring, Results and Compliance.

Energy use is measured at PKCT on a monthly basis. Energy use generally follows the same trend as throughput at the site, i.e. when there is an increase in throughput, energy use also

increases. Figure 34 below provides monthly energy consumption and tonnes for the 2016/2017 reporting period.



Month	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17
kWh	1,662,768	1,696,692	1,268,346	1,249,180	1,073,892	1,238,827	1,062,057	1,109,599	1,442,552	1,297,136	1,041,103	1,266,876
Tonnes	952,784	970,701	665,107	655,540	460,486	675,617	485,936	490,559	933,875	703,788	492,457	571,580

Figure 34: PKCT tonnes v kWh

5.8.3 Trends in Energy Efficiency

PKCT measures energy efficiency against its baseline energy efficiency target of 1.655 kWh/tonne. This figure is calculated by dividing the energy used at the premises (kWh) by throughput (tonnes). The 2016/2017 reporting period saw eleven months where monthly kWh/tonne exceeded the baseline energy efficiency target, see Figure 35 below. These records correspond with historically low throughput across the reporting period.

Overall, the kWh/tonnes for the 2016/2017 reporting period was above the baseline energy efficiency target of 1.655kWh/tonne (1.97kWh/tonne). This result is directly related to the drop in tonnes through the Terminal experienced across the reporting period.

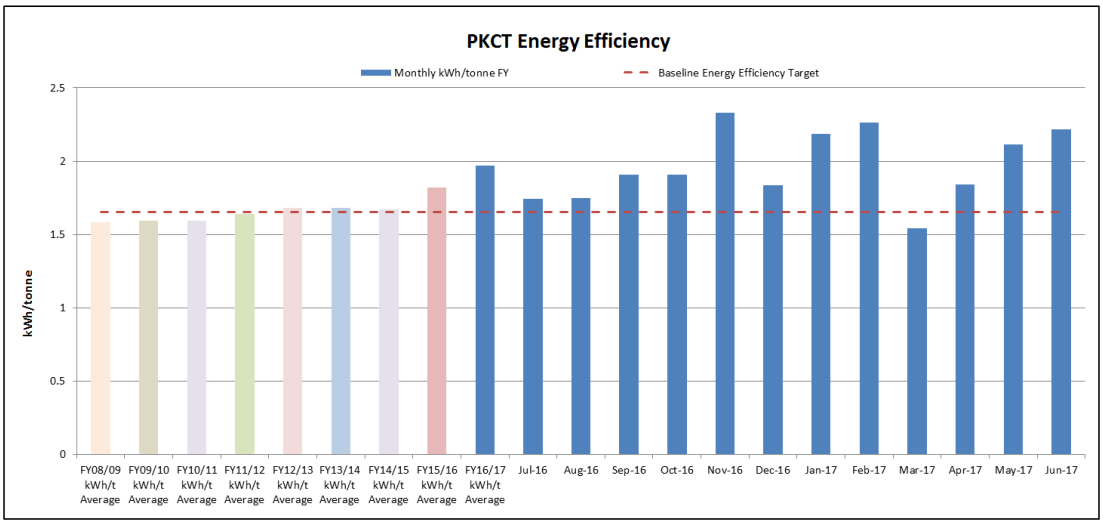


Figure 35: PKCT energy efficiency trends

PKCT monitors greenhouse gas generated by the site annually. At this stage, greenhouse gas emissions and reportable energy are below the legislated reporting thresholds, see Figure 33. Reportable energy consumption and greenhouse gas emissions have slightly decreased at PKCT this reporting period. Energy use and therefore emissions follow throughput. Figure 36 below shows this emissions trend.

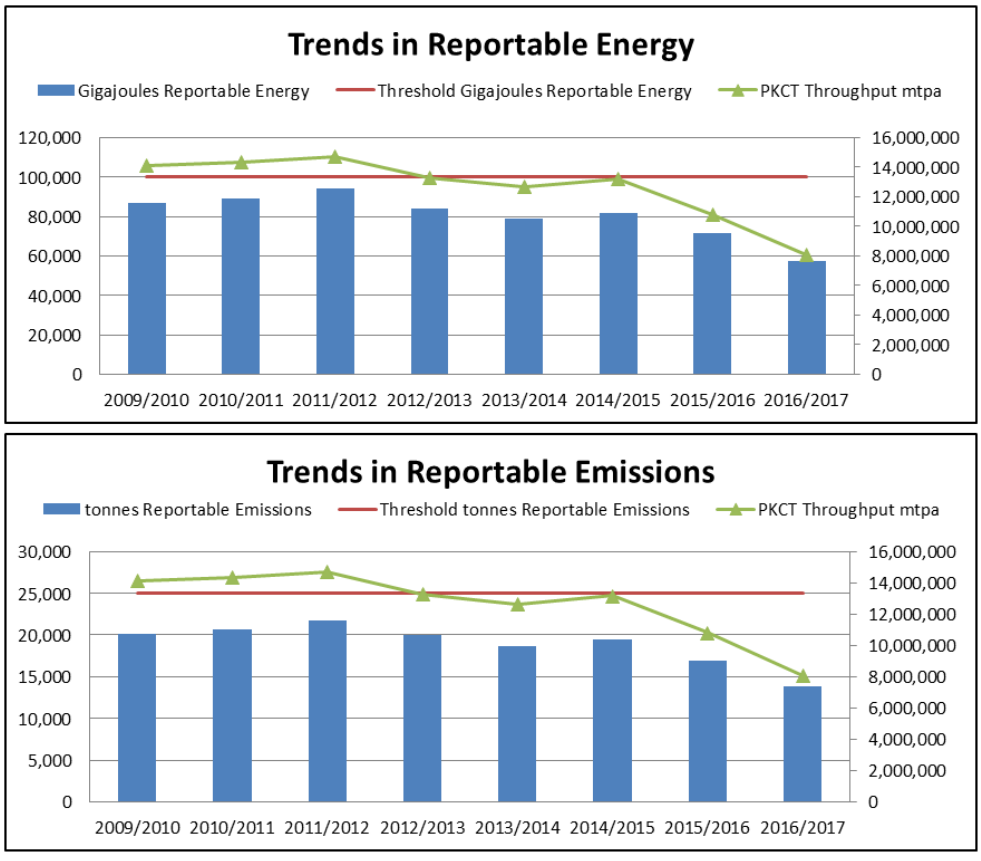


Figure 36: Trends in reportable energy and greenhouse gas emissions

5.8.4 Energy Efficiency –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to Energy Efficiency is presented below.

- PKCT continues to look for energy savings wherever possible. PKCT is currently undergoing a major restoration and compliance program which includes replacing the yard machines with LED lighting to focus light only where needed and reduce energy use, Variable Speed Drives and power factor correction to reduce energy losses in the distribution system.

5.8.5 Energy Efficiency - Activities Planned for 2017/2018 Reporting Period

The 2017 AECOM Independent External Audit made two recommendations associated with PKCT's Greenhouse Gas and Energy Efficiency Management Plan. A summary of these actions planned for the 2017/2018 reporting period is presented below.

- PKCT will update its GGEEMP to reflect that the Energy Savings Action plan Program has ended and will identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions. Additionally, the Plan will be updated to include the current NGER reporting thresholds and triggers.
- PKCT will continue to ensure that energy efficiency is considered during any planning for future restoration works.

5.9 Waste

5.9.1 Waste Standards and Performance Measures

Operating Conditions

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

5.9.2 Waste Monitoring

5.9.2.1 Waste Monitoring Methodology

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

The objectives of the WSMP are to;

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

5.9.2.2 Waste Monitoring Results and Compliance 2016/2017

PKCT records and tracks waste as it is generated across the site. Waste streams at PKCT are tracked via normal operations and through project specific operations. A summary of the waste generated through various projects at PKCT is presented below in Figure 37.

Waste Volumes by Project - July 2016 to June 2017			
Project	Type	Quantity	Disposal method
Berth Rails 3, 4 and 5	Steel	21.64 t	Recycled
HV Distribution	Transformer Oil	8,700 L	Recycled

Figure 37: Project generated waste 2016/2017

General site waste is managed by a waste contractor. An annual summary of the waste generated at PKCT across the reporting period is presented below in Figure 38.

Annual Waste Volumes	July 2016 to June 2017		
General Waste	95,976	kg	Landfill
Cardboard Recycling	4,326	kg	Recycled
Waste Rags	1,920	L	Recycled
Waste Grease Cartridges	480	L	Recycled
Waste Oil Filters	480	L	Recycled
Waste Pressure Packs	1,440	L	Recycled
J120 Waste (oil and hydrocarbons mixed with water)	48,430	L	Off Site Treatment
Black Iron	46	tonne	Recycled

Figure 38: Waste Summary FY2016/2017

5.9.3 Trends in Waste

Figure 39 below shows trends in three different waste streams generated at PKCT, steel, general waste and cardboard. The 2016/2017 reporting period saw a decrease in two of three waste streams generated through PKCT's operations.

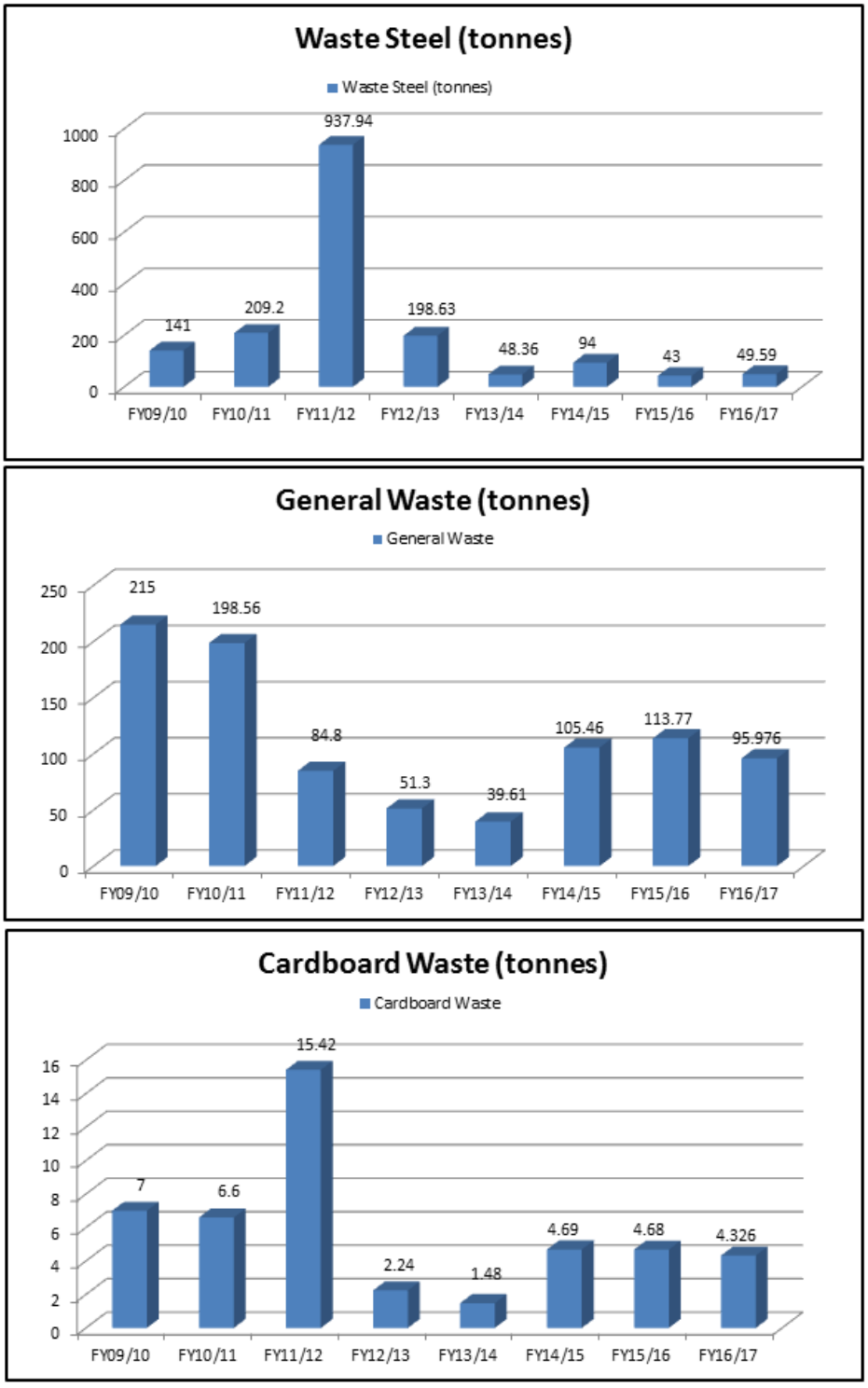


Figure 39: Waste trends at PKCT

5.9.4 Waste –Activities Undertaken During 2016/2017 Reporting Period

A summary of the actions undertaken for the 2016/2017 reporting period related to waste is presented below.

- 11,576 tonnes of spillage coal was returned to customers as part of spillage screening and recycling activities during the reporting period.
- PKCT's Reclaimer 2 was demolished in June 2017. The scrap steel will progressively be removed from the machine and recycled at various locations in the local area.

5.9.5 Waste - Activities Planned for 2017/2018 Reporting Period

The 2017 AECOM Independent Audit identified an opportunity for improvement and a recommendation associated with waste. These findings which are to be completed in the coming reporting period are outlined below.

- PKCT's waste contractor does not outline in its monthly reports where the waste is taken once it is removed from PKCT's premises. PKCT will work with its contractor to ensure that the final waste destination is included in the supplied monthly waste reports.
- PKCT is to update the existing Waste Management Plan to reference how PKCT treats, stores, processes and reprocesses, transports and disposes of waste generated at the facility.

- PKCT will undertake an annual review of the Waste Management Plan.

- PKCT will continue to identify areas of waste reduction across its operations.

5.10 Hazards

5.10.1 Hazards Standards and Performance Measures

Dangerous Goods

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

5.10.2 Hazards Monitoring

5.10.2.1 Hazards Monitoring, Results and Compliance.

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

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

Regular environmental auditing is undertaken in the Main Store and Workshop areas to ensure compliance with relevant standards.

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

5.11 Fire Control

5.11.1 Fire Control Standards and Performance Measures

Fire Control

21. During the project, the Proponent shall:

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

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

5.11.2 Hazards Monitoring

5.11.2.1 Fire Control Monitoring, Results and Compliance.

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

5.11.3 Fire Control –Activities Undertaken During 2016/2017 Reporting Period

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

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

- Ongoing servicing and compliance checks of fire-fighting systems in line with relevant standards, is undertaken by certified external service providers.

5.11.4 Fire Control - Activities Planned for 2017/2018 Reporting Period

The AECOM Independent Audit did not identify any actions associated with fire control. PKCT will continue to utilise its FMP and ensure it complies with the stipulated fire control standards and performance measures.

- PKCT will continue to ensure ongoing servicing and compliance checks of fire-fighting systems remain in line with relevant standards and checks are undertaken by certified external service providers.

5.12 Community

5.12.1 Community Engagement Activities

PKCT continues to utilise its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. PKCT typically holds its CCC meetings at least on a 4 monthly basis. A summary of

the information presented to the PKCT CCC during the reporting period is presented below in Figure 40.

Meeting Date	Presented Information
6th December 2016	PKCT Operational update, environmental compliance for air and water quality, wave generator removal update, general business.
8th March 2017	Environmental compliance for air and water quality, update on PKCT's new yard machines, wave generator removal update, general business.
7th June 2017	Environmental compliance for air and water quality, update on PKCT's new yard machines and demolition of old machines, wave generator removal update, general business.

Figure 40: PKCT CCC Meetings

5.12.2 Community Contributions

PKCT supports the Port Kembla branch of the Mission to Seafarers. In June 2017, PKCT donated $5000 to the Mission.

5.12.3 Community Complaints

PKCT received no community complaints across the reporting period, a number similar to the past few reporting years. A summary of community complaints by type as received over the past 6 years is presented below in Figure 41.

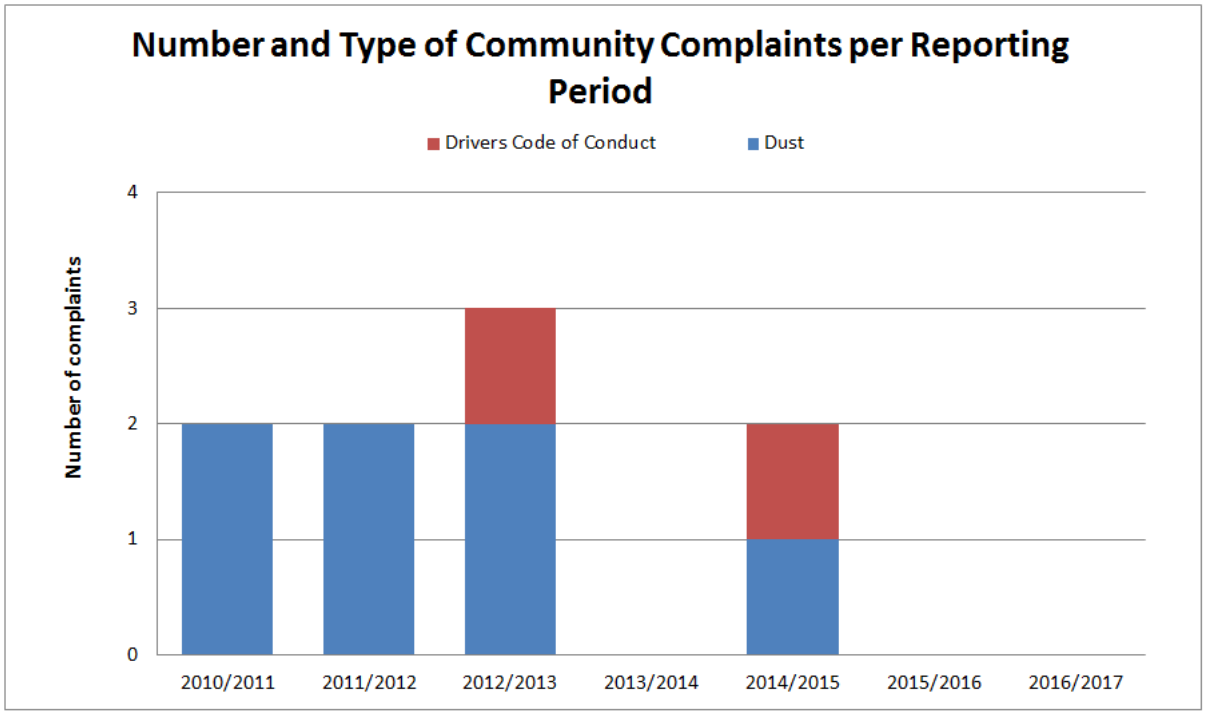


Figure 41: Community Complaints Summary

6.0 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

6.1 Environmental Management Performance Measures and Compliance

Environmental Management (Schedule 4, Condition 1)	Relevant section of PKCT EMS
The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:	Refer to the PKCT EMS
a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General	EMS was submitted to the DP&E with eth 2009/2010 AEMR by the due date of 31st July 2010
b) provide for the strategic context for the environmental management of the project;	Refer to Section 5
c) identify the statutory requirements that apply to the project;	Refer to Section 6
d) describe the procedures that would be implemented to: • 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-compliance; • manage cumulative impacts; and • respond to emergencies;	Refer to Section 11 Refer to Section 11 Refer to Section 11.3 Refer to Section 7.6 Refer to Section 7.3 Refer to Section 8.1
e) include an environmental monitoring program for the project that includes all the monitoring requirements of the approval;	Refer to Section 9
f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and	Refer to Section 9
a) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.	Refer to Section 4

Figure 42: EMS compliance in the AEMR

PKCT has in place an approved Environmental Management Strategy (EMS). The EMS was submitted with the 2009/2010 AEMR to the DP&E. The EMS details how PKCT complies which each line item of Schedule 4, Condition 1, Environmental Management of Project Approval 08_0009. Figure 42 above references the specific EMS Sections that PKCT utilises for compliance with Schedule 4, Condition 1.

6.2 Reporting - Incident Reporting

Incident Reporting

2. Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.

3. Within 21 days of notifying the Department and other relevant agencies of such an incident, the Proponent shall provide the Department and these agencies with a written report that:

   a) Describes the date, time, and nature of the incident;

   b) Identifies the cause (or likely cause) of the incident

   c) Describes what action has been taken to date: and

   d) Describes the proposed measures to address the incident.

Requirements associated with Schedule 4, Conditions 2 and 3 are referenced in PKCT's EMS and Event Management Procedure. There were no reportable incidents of "material harm" across the 2016/2017 reporting period.

6.3 Reporting - Annual Reporting

Annual Reporting

4. Within 12 months of this approval, and annually thereafter, the Proponent shall submit and AEMR to the Director-General and all relevant agencies. This report must:

   a) Identify the standards and performance measures that apply to the project

   b) Describe the works carried out in the last 12 months;

   c) Describe the works planned to be carried out in the next 12 months;

   d) Include a summary of the complaints received during the past year; and compare this to complaints received in the previous years;

   e) Include a summary of the monitoring results for the project during the past year;

   f) Include an analysis of these monitoring results against the relevant:

      - Impact assessment criteria/limits;
      - Monitoring results from previous years; and
      - Predictions in the EA or other documents listed in condition 2 of schedule 2;

   g) Identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures;

   h) Identify any trends in the monitoring results over the life of the project;

   i) Identify any non-compliance during the previous year; and

   j) Describe what actions were, or are being, taken to ensure compliance.

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

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

Each of these additional components is included in this AEMR.

6.4 Independent Environmental Audit

Independent Environmental Audit

5. By 31 March 2011 and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an independent Environmental Audit of the Project. This audit must:

a) Be conducted by a suitable qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;

b) Include consultation with the relevant agencies;
c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL (Including any strategy, plan or program required under these approvals); and
d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate
e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.

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

6. Within 6 weeks of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit report.
7. Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director-General.

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

PKCT completed the audit and submitted an Audit Report and associated Action Plan to the DP&E on 14th June 2017. At the time of submission of this AEMR, PKCT has not yet received any response on the Submitted Audit Report or Action Plan from the DP&E.

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

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

It is noted that of the 12 conditions found to be non-compliant, 8 of these are associated with events that occurred early in the 3 year audit period. Remedial actions associated with these events were developed and completed around the time of the event and no further events have occurred since.

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

6.5 Access to Information

Access to Information

8. Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:
   a) provide a copy of the relevant document/s to the relevant agencies
   b) place a copy of the document/s on its website; and
   c) remove superseded copies of strategies/plans/programs from its website.

9. During the project, the Proponent shall:

a) make a summary of monitoring results required under this approval publically available on its website; and
b) Update these results on a regular basis (at least every 6 months).

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

As required under Condition 9, PKCT makes a summary of its monitoring results publically available on its website. The PKCT 2015/2016 AEMR and the 2015/2016 interim EMR can be found on www.pkct.com.au.

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

7.0 STATEMENT OF COMMITMENTS

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

PKCT's compliance with these commitments across the 2016/2017 reporting period is outlined in the following sections.

7.1 Statement of Commitments -Traffic and Transportation

Objective	Commitment
• Transport of coal and bulk products to PKCT to be conducted in a manner which does not adversely impact on public safety or amenity of road users. • Safety standards to be maintained by trucks following designated routes procedures • Internal PKCT roadways to be maintained to minimize coal and bulk products spillage and carry over onto public roadways.	• Public road haulage of coal and bulk products to PKCT will not exceed 10 million tonnes per annum. • Publication of annual throughput tonnes including in-loading method (i.e. road and rail received coal and bulk products). • All trucks delivering coal and bulk products to PKCT must follow designated heavy vehicle transport routes. • A driver's code of conduct will be utilised for all transport companies delivering product to PKCT. • Review effectiveness of truckwash facilities to be undertaken. • Unless further or alternative Approval for NRE No 1 Colliery at Russell Vale is in place, PKCT will only receive coal from the NRE No 1 Colliery if that coal has been dispatched from that Colliery by public road between the hours of 7am to 10pm Monday to Friday and 8am to 6pm Saturday and Sunday or Public Holidays.

A summary of actions undertaken across the 2016/2017 reporting period specific to this Statement of Commitments is presented below. Further details related to the Traffic and Transportation Statement of Commitments can be found under Section 3.2 of the AEMR.

- Public road receivals for the reporting period were 2.77mtpa.
- An AEMR is published on the PKCT website every 12 months, making throughput records publically available. Additionally, real time throughput is available on PKCT's website.
- PKCT and its associated road transport providers utilise an auditing program to ensure compliance with the PKCT DCC. This includes monitoring of trucks adherence to the specified travel routes.
- PKCT receives monthly DCC compliance reports from Bohud Transport who provide coal haulage for Wollongong Coal. Wollongong Coal must ensure that coal is dispatched within the designated dispatch hours. The reports highlight any breaches to the designated dispatch hours. No breaches were reported to PKCT, or observed in the 2016/2017 reporting period.

7.2 Statement of Commitments -Air Quality

Objective	Commitment
• Minimise dust emissions from activities carried out on the PKCT site.	• Installation of two continuous dust monitors to monitor airborne dust emissions. • Maintain appropriate dust suppression systems on site to effectively manage dust both on stockpiles and roadways.

A summary of actions undertaken across the 2016/2017 reporting period specific to this Statement of Commitments is presented below. Further details related to the Air Quality Statement of Commitments are found under Section 3.3 of the AEMR.

- PKCT has two continuous dust monitors. These remained operational throughout the reporting period.
- PKCT has a preventative maintenance system in place (Works and Assets) which provides for the routine inspection and maintenance of environmental equipment including existing dust suppressions systems, stockpile sprays, truck wash and water cart. Operations shift teams monitor and operate the equipment and, where necessary, provide a breakdown response.
- Across the reporting period, PKCT installed a temporary unsealed road to assist with transportation of the new yard machines across site to their operational locations. Following monitoring of the unsealed road, PKCT opted to seal 20,000m² of the temporary road with an asphalt mix to prevent dust lift off. This work was completed in mid-June 2017 and will remain in place while ever the road remains in place.

7.3 Statement of Commitments -Water Management

Objective	Commitment
• Minimise use of potable water on site. • Effective management of on-site stormwater.	• Reduction of freshwater use on site to be achieved through the implementation of recycled water (Tertiary Treated Effluent) for dust suppression on stockpiles and other non-domestic uses e.g. fire, spillage washdown, conveyor sprays. Staged approach to be implemented which will result in a 360 Megalitre per annum reduction by the end of 2010.

A summary of actions undertaken across the 2016/2017 reporting period specific to this Statement of Commitments is presented below. Further details related to the Water Management Statement of Commitments are found under Section 3.5 of the AEMR.

- Recycled water use has continued at PKCT across the reporting period. Full details and summary of volumes are presented in Section 3.5.

7.4 Statement of Commitments -Noise Management

Objective	Commitment
• Responsible management of PKCT site operational noise.	• Ensure that ongoing compliance is maintained to the NSW Industrial Noise policy. • Development and implementation of a noise management plan for the PKCT site.

By letter dated 16th March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued. Subsequently, PKCT undertook no noise monitoring surveys across the reporting period. Further details related to the Noise Management Statement of Commitments are found under Section 3.1 of the AEMR.

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

7.5 Statement of Commitments -Community Relations

Objective	Commitment
• PKCT to be regarded as a responsible corporate citizen by the community.	• Continued operation of the PKCT Community Consultative Committee • Continued advertisement and operation of the telephone hotline.

A summary of actions undertaken across the 2016/2017 reporting period specific to this Statement of Commitments is presented below.

- PKCT utilises its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. PKCT held three meetings across the reporting period on 6th December 2016 8th March 2017 and 7th June 2017. PKCT will continue to hold these forums at least on a 4 monthly basis.
- PKCT received no community complaints associated with the operation during the reporting period.
- PKCT continues to utilise its telephone hotline. The hotline and general contact details for the site are located on the PKCT website, www.pkct.com.au.

7.6 Statement of Commitments – Environmental monitoring

Objective	Commitment
• To ensure compliance to the conditions of PKCT's Department of the Environment and Climate Change licence.	• Development and implementation of a management plan which documents the environmental monitoring requirement of PKCT.

PKCT has in place Environmental Monitoring Strategy MP.HS.464. The Strategy outlines the various monitoring requirements together with references to applicable management plans. General descriptions of PKCT monitoring and monitoring methodology are found throughout the AEMR. Figure 43 below outlines the sections of the AEMR describing Environmental Monitoring.

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

Figure 43: Environmental monitoring area and reference in AEMR

7.7 Statement of Commitments – Environmental Management System

Objective	Commitment
• PKCT to maintain certification o ISO 140001.	• PKCT will continue to be certified to ISO 14001 and will be externally audited against the certification criteria on an annual basis.

A summary of actions undertaken across the 2016/2017 reporting period specific to this Statement of Commitments is presented below.

- PKCT participated in one combined ISO 14001 and ISO 9001 external audit across the reporting period. The audit was undertaken by Lloyds over 2 days from 19th to 20th October 2016. PKCT's next ISO14001 and ISO 9001 audit is scheduled for early July 2017.
- On 7th and 10th April 2017, PKCT completed its triennial independent audit. Findings from the audit are presented in Appendix G: ISO 14001 and 9001 Certificate.

7.8 Statement of Commitments – Greenhouse Gases

Objective	Commitment
• Minimise the production of greenhouse gas emissions associated with PKCT operations	• PKCT to review onsite electricity use and identify and implement economically viable opportunities for reduced electricity usage.

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

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

Further details related to the Greenhouse Gas and Energy Efficiency Statement of Commitments can be found under Section 3.8 of the AEMR.

7.9 Statement of Commitments – Landscaping

Objective	Commitment
• Improve the visual amenity of PKCT on the surrounding community.	• Improve onsite soft landscaping through the planting of trees on the road receival earth bund and along the northern site boundary.

With reference to the Landscape Management Plan MP.HS.460 (LMP), PKCT has developed a Landscape Concept Plan along the northern boundary. During this reporting period, maintenance of Stage 2 has continued and the area is now well established, see Figure 31 in Section 3.7 for progress of landscaping.

The nature and timing of further landscaping works requires consideration of major remedial works in development and PKCT's strategic planning to ensure their compatibility. Stage 3 Road Receival landscaping remains on hold currently.

7.10 Statement of Commitments – Flora and Fauna

Objective	Commitment
• Management of Green and Golden Bell Frogs (GGBF)	• Implement Interim Management Plan • Undertake a GGBF Survey and then develop a Long Term Plan of Management.

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

A GGBF survey was undertaken by specialist consultants on 28th February 2017. No GGBF's were found on site.

Further details related to the Flora and Fauna Statement of Commitments are found under Section 3.6 of the AEMR.

7.11 Statement of Commitments – Waste

Objective	Commitment
• Minimise waste generated at the site to reduce the volume of waste requiring disposal to landfill. • Prevent dispersal of waste from the site to receiving environments.	• Develop a Waste Management Plan for the site.

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

Further details related to the Waste Statement of Commitments are found under Section 3.9 of the AEMR.

8.0 ENVIRONMENTAL PROTECTION LICENCE 1625

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

PKCT is required to submit an Annual Return to the EPA reporting performance against licence requirements. The 2016/2017 Annual Return was submitted to the EPA via registered post on the 25th May 2017.

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

Figure 44 below provides a summary of the EPL conditions, Project Approval 08_0009 requirements and the section of the AEMR that discusses the criteria.

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

Figure 44: Common requirements of Project Approval 08_0009 and EPL1625

8.1 Other EPL Matters in the 2016/2017 Reporting Period

- PKCT's personnel were re-familiarised on PKCT's Pollution Incident Response Management Plan and participated in mock emergency drills as part of the 2016 Safety Training Days run through October, November and December.

- PKCT has continued to update its website with monthly monitoring data summaries throughout the reporting period, see www.pkct.com.au.

- On 14th March 2017, EPA undertook a desktop audit of PKCT's Pollution Incident Response Management Plan (PIRMP), which is a requirement under the Protection of the Environment Operations (General) Regulation 2009. Following the audit, some minor updates were made to the PIRMP document and as per the conditions of the audit, the EPA was notified of these updates within the required timeframe. PKCT will continue to undertake an annual review and testing of the PIRMP as required under legislation.

- On 30th May 2014, the EPA undertook a legal compliance audit of PKCT's rail receival operation focusing on rail wagon dust and coal residue drag out. In December 2014, PKCT received the final audit report. The report identified a single non-compliance related to fine dust deposition on the exterior of wagons. In response to the audit findings, PKCT developed an Action Program. The Action Program was submitted to the EPA on the 31st March 2015. On the 28th August 2015, the EPA undertook a follow up inspection of PKCT's rail receival process to assess the implementation status of corrective actions identified during the 2014 audit. Observations were made on the status of PKCT's actions, with no further non-compliances or actions identified. Following consultation with the EPA and other NSW Coal Terminals, PKCT

agreed to an Environmental Improvement Program (EIP) focused on monitoring parasitic coal and overloading on incoming rail wagons. The initial monitoring component of this EIP commenced on 1st February 2016 and continued through until 1st September 2016. Results of the monitoring are reported through to both PKCT's load points and the EPA. Following the completion of the initial phase of monitoring and consultation with the EPA and other Coal Terminals, PKCT agreed to continue monitoring coal wagons under the conditions set out in EIP U4. This monitoring will continue through until November 2017. No unsatisfactory coal trains have been identified during the monitoring process.

- During the 2016/2017 Annual Return reporting period, PKCT had 4 instances where dust deposition bottles were found to be broken on the collection date, and one instance where a bottle was found with the remains of an animal carcass in the base. Samples associated with these bottles were unable to be analysed. The broken bottles were varied in their location and were broken as a result of in-situ glass fatigue and possibly vandalism. Work undertaken across the reporting period to replace bottles decrease the number of broken bottle compared to the previous reporting period.
  PKCT changed to a new contracting company and lab in May 2017 and will continue to monitor and manage any broken bottles as they occur.

- PKCT operates two Osiris continuous dust monitors located to the north and south of the site. The monitors recorded continuous data for 96% of time across the monitoring period. There were 12 days in total (both monitors combined) where data was lost as a result equipment or telemetry faults. As reported in the 2016/2017 Annual Return, it is not expected that the short duration loss of data led to any adverse environmental impacts.

- In December 2016, PKCT submitted to the EPA an effectiveness review on the Central Pond Upgrade which was completed 12 months prior. The review which satisfied the conditions of PKCT's PRP12 Stage 1(e) identified a number of water quality and dust improvements as a result of the Central Pond Upgrade Works. Upon review of the submitted report, The EPA notified PKCT via letter dated 16/01/2017 that the report satisfied the requirements of the PRP and removed the PRP from PKCT's licence.

- In April 2017, PKCT completed and submitted a report to the EPA satisfying the conditions of EIPU2 - Use of Real Time Particulate Monitoring Data for Operational Control. The report identified some minor improvements to the existing real time dust monitoring system which will be actioned accordingly. The EPA notified PKCT via letter data 09/06/2017 that they were satisfied that the report had satisfied the requirements of the EIP and had removed the condition from PKCT's licence.

- In late June 2017, PKCT submitted an EIP U1 "Particulate Matter Control Best Practice Study" to the EPA. PKCT expects to receive feedback from the EPA once the document has been reviewed.

9.0 RESULTS COMPARED TO THE ENVIRONMENTAL ASSESSMENT 2008

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

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

Monitoring results obtained over the 2015/2016 reporting period align with predications made in the EA. Traffic and noise studies undertaken associated with PKCT's application to the DPE for 7.5 MTPA to 10 MTPA approval also aligned.

Air quality monitoring results are compared to the predictions of the EA in Section 3.3 of the AEMR.

10.0 COMPLAINTS

Schedule 4, Condition 4d requires PKCT to include a summary of the complaints received during the past year, and compare this to complaints received in previous years. Figure 45 below provides a summary of complaints recorded at PKCT and reported to PKCT by road transport providers.

PKCT received no complaints across the 2016/2017 reporting period.

As can be seen in Figure 45, total complaints made to PKCT have remained relatively consistent at a low level over the past five reporting periods. PKCT continues to record all complaints in its Event Management System and responds appropriately when a complaint is received. PKCT continues to work with its shippers and road transport providers to ensure complaints are recorded and handled appropriately.

	Number of Complaints recorded by PKCT						
Complaints	FY10/11	FY11/12	FY12/13	FY13/14	FY14/15	FY15/16	FY16/17
General (PKCT)	2	2	3	0	2	0	0
Drivers Code of Conduct related	19	19	20	5	3	0	0
Total	21	21	23	5	5	0	0

Figure 45: PKCT and DCC complaints.

11.0 CONCLUSION

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

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

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

11.1 Appendix A: Drivers Code of Conduct Summary

Monthly Reports Summary FY 16/17	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	FY16/17 Total	Comment
Tonnes - Public Road	412,437	424,993	101,019	171,355	111,821	163,279	176,745	294,034	310,397	272,869	156,208	175,363	2,770,519	
Tonnes - Private Road	293,079	326,839	318,989	263,126	232,523	244,021	235,443	111,967	220,917	215,925	202,884	258,359	2,924,072	nb primarily rail delivered tonnes to BlueScope then internal road to PKCT
Total road tonnes	705,516	751,832	420,008	434,481	344,344	407,300	412,188	406,001	531,314	488,794	359,092	433,722	5,694,591	
Spillage - Public Road	0	0	0	0	0	0	0	0	0	0	0	0	0	No spills reported by shippers or road transport providers
Incident - Other	0	0	0	0	0	0	0	0	0	0	0	0	0	No incidents reported by shippers or road transport providers
Impact with other vehicle	0	0	0	0	0	0	0	0	0	0	0	0	0	No impacts with other vehicles reported by shippers or road transport providers
Incidents Reported to RTA	0	0	0	0	0	0	0	0	0	0	0	0	0	No incidents reported by shippers or road transport providers
Complaints	0	0	0	0	0	0	0	0	0	0	0	0	0	Note: complaints related to DCC only
EPL/ regulatory breaches	0	0	0	0	0	0	0	0	0	0	0	0	0	
Inductions (%)	100	100	100	100	100	100	100	100	100	100	100	100	100	
Hours restrictions breach	0	0	0	0	0	0	0	0	0	0	0	0	0	
Road Transport Providers (RTP): Observations	107	100	76	70	57	57	64	98	65	108	58	96	956	
RTP: Number of drivers observed	917	904	320	598	417	404	455	838	646	672	521	754	7,446	
RTP: Trucksafe/NHVAS/Other Audits	12	12	13	12	8	13	8	76	18	72	60	62	366	
CTO / Audits at minesites (Shippers & PKCT)	0	0	0	0	0	0	0	0	0	0	0	0	0	Includes data from Shippers and PKCT
CTO / Audits: At PKCT (Shippers & PKCT)	2	2	0	0	3	1	2	2	1	1	0	1	15	Includes data from Shippers and PKCT
CTO / Audits: Mine to PKCT (Shippers & PKCT)	0	0	0	0	0	0	0	1	0	0	0	0	1	Includes data from Shippers and PKCT
RTP system audits	0	0	0	0	0	0	0	0	3	0	0	0	3	

11.2 Appendix B: Consultant Dust Data Summary

Table 9 Exceedances of the 24-hour average TSP trigger level of 90 µg/m³ at the northern PKCT monitoring site during the July 2016 to June 2017 reporting period

Date of exceedance	24-hour average TSP concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				µg/m³	%	Rating	Maximum	Average
30 October 2016	112.5	Unlikely	0.0%	0	0%	None	6.6	3.4
7 November 2016	97.2	Possible	8.3%	15.3	16%	Minor	6.6	2.5
18 November 2016	100.6	Possible	17.4%	16.2	16%	Minor	5.3	2.1
20 November 2016	95.4	Unlikely	3.5%	1.2	1%	Minimal	5.1	2.1
21 November 2016	111.2	Unlikely	5.6%	See table note d		None	4.6	2.1
22 November 2016	101.0	Possible	22.9%	9.7	10%	Minimal	5.9	2.9
13 December 2016	202.4	Unlikely	4.9%	See table note d		None	4.9	2.4
26 December 2016	115.9	Unlikely	0.7%	0.3	0%	Minimal	5.8	2.8
27 December 2016	164.4	Possible	12.5%	8.0	5%	Minimal	3.0	1.6
28 December 2016	188.4	Unlikely	0.7%	0.1	0%	Minimal	6.0	2.5
29 December 2016	299.1	Possible	20.8%	36.6	12%	Minor	3.8	1.3
30 December 2016	184.5	Possible	21.5%	22.7	12%	Minor	6.1	1.9
31 December 2016	178.9	Possible	56.3%	8.9	5%	Minimal	5.9	2.5
1 January 2017	102.6	Unlikely	0.0%	0	0%	None	4.5	2.1
9 January 2017	115.3	Possible	31.3%	11.2	10%	Minimal	7.9	2.4
13 January 2017	101.5	Unlikely	2.8%	4.1	4%	Minimal	6.9	3.3
17 January 2017	99.9	Unlikely	1.4%	0.1	0%	Minimal	4.9	2.3
30 January 2017	107.8	Possible	6.9%	11.7	11%	Minor	5.7	2.6
31 January 2017	94.6	Possible	75.0%	See table note d		None	8.2	3.7
10 February 2017	144.1	Possible	26.4%	8.9	6%	Minimal	7.2	2.2
11 February 2017	90.4	Possible	38.2%	8.8	10%	Minimal	8.0	2.7
18 March 2017	101.4	Possible	88.2%	48.8	48%	Moderate	9.3	5.5

Date of exceedance	24-hour average TSP concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				µg/m³	%	Rating	Maximum	Average
19 March 2017	157.5	Unlikely	0.0%	0	0%	None	6.9	4.5
20 March 2017	275.1	Unlikely	0.0%	0	0%	None	4.6	2.4
21 March 2017	294.9	Unlikely	2.1%	2.7	1%	Minimal	4.6	1.5
29 March 2017	102.2	Unlikely	4.9%	6.3	6%	Minimal	5.4	1.6

Table notes:
[a] Identified using scatter plots of 10-minute average TSP concentration versus wind direction and wind speed
[b] Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern TSP concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average TSP concentration (0% = no cont, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)
[c] Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period
[d] For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site

Table 10 Exceedances of the 24-hour average PM_{10} air quality standard of 50 µg/m³ at the northern PKCT monitoring site during the July 2016 to June 2017 reporting period

Date of exceedance	24-hour average PM_{10} concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				µg/m³	%	Rating	Maximum	Average
9 September 2016	54.1	Unlikely	0.0%	0	0%	None	8.0	3.7
26 October 2016	51.7	Possible	12.5%	3.2	6%	Minimal	3.9	1.8
30 October 2016	85.4	Unlikely	0.0%	0	0%	None	6.6	3.4
7 November 2016	69.1	Possible	8.3%	10.5	15%	Minor	6.6	2.5
8 November 2016	58.7	Possible	80.6%	13.2	23%	Minor	5.9	3.2
18 November 2016	71.4	Possible	17.4%	11.3	16%	Minor	5.3	2.1
19 November 2016	56.3	Possible	90.3%	16.4	29%	Minor	6.8	3.3
20 November 2016	68.9	Unlikely	3.5%	0.7	1%	Minimal	5.1	2.1
21 November 2016	80.2	Unlikely	5.6%	See table note d		None	4.6	2.1
22 November 2016	73.7	Possible	22.9%	7.1	10%	Minimal	5.9	2.9
28 November 2016	53.2	Unlikely	6.9%	0.5	1%	Minimal	6.2	2.6
5 December 2016	50.7	Unlikely	21.5%	See table note d		None	7.9	2.8
12 December 2016	60.2	Unlikely	0.0%	0	0%	None	6.1	2.8
13 December 2016	142.6	Unlikely	4.9%	2.2	2%	Minimal	4.9	2.4
26 December 2016	83.1	Unlikely	0.7%	0.3	0%	Minimal	5.8	2.8
27 December 2016	116.9	Possible	12.5%	7.3	6%	Minimal	3.0	1.6
28 December 2016	135.0	Unlikely	0.7%	0.2	0%	Minimal	6.0	2.5
29 December 2016	204.5	Possible	20.8%	28.7	14%	Minor	3.8	1.3
30 December 2016	122.8	Possible	21.5%	18.0	15%	Minor	6.1	1.9
31 December 2016	127.3	Possible	56.3%	13.1	10%	Minor	5.9	2.5
1 January 2017	71.9	Unlikely	0.0%	0	0%	None	4.5	2.1
8 January 2017	54.0	Unlikely	0.0%	0	0%	None	6.0	2.9

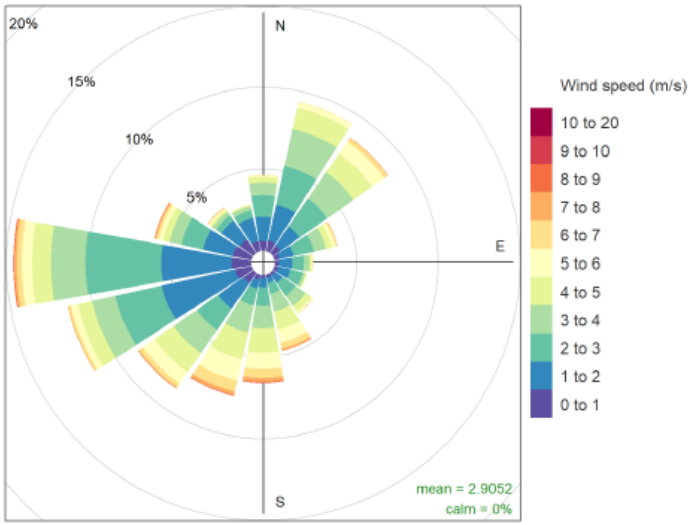
Date of exceedance	24-hour average PM_{10} concentration ($\mu g/m^3$)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				$\mu g/m^3$	%	Rating	Maximum	Average
9 January 2017	80.1	Possible	31.3%	9.2	11%	Minor	7.9	2.4
13 January 2017	71.1	Unlikely	2.8%	3.4	5%	Minimal	6.9	3.3
17 January 2017	68.9	Unlikely	1.4%	0.2	0%	Minimal	4.9	2.3
23 January 2017	54.3	Unlikely	0.0%	0	0%	None	6.2	3.4
30 January 2017	75.0	Possible	6.9%	8.7	12%	Minor	5.7	2.6
31 January 2017	66.9	Possible	75.0%	See table note d		None	8.2	3.7
10 February 2017	101.0	Possible	26.4%	5.9	6%	Minimal	7.2	2.2
11 February 2017	65.3	Possible	38.2%	6.1	9%	Minimal	8.0	2.7
16 February 2017	57.1	Unlikely	5.6%	See table note d		None	4.9	2.4
17 February 2017	54.2	Unlikely	1.4%	0.7	1%	Minimal	6.8	2.9
23 February 2017	54.3	Unlikely	0.0%	0	0%	None	4.8	3.0
13 March 2017	51.8	Unlikely	13.9%	5.1	10%	Minimal	8.1	3.1
15 March 2017	55.4	Unlikely	0.7%	See table note d		None	8.7	4.0
16 March 2017	62.2	Unlikely	4.2%	1.1	2%	Minimal	8.0	3.8
18 March 2017	76.1	Possible	88.2%	34.4	45%	Moderate	9.3	5.5
19 March 2017	113.2	Unlikely	0.0%	0	0%	None	6.9	4.5
20 March 2017	187.5	Unlikely	0.0%	0	0%	None	4.6	2.4
21 March 2017	197.9	Unlikely	2.1%	1.7	1%	Minimal	4.6	1.5
26 March 2017	54.4	Unlikely	0.7%	0.0	0%	Minimal	3.5	1.8
28 March 2017	56.7	Possible	70.8%	7.2	13%	Minor	7.4	2.7
29 March 2017	66.3	Unlikely	4.9%	4.4	7%	Minimal	5.4	1.6

Date of exceedance	24-hour average PM_{10} concentration ($\mu g/m^3$)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				$\mu g/m^3$	%	Rating	Maximum	Average

Table note:
[a] Identified using scatter plots of 10-minute average PM_{10} concentration versus wind direction and wind speed
[b] Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern PM_{10} concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average PM_{10} concentration (0% = no cont, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)
[c] Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period
[d] For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site

11.3 Appendix C: PKCT Annual Wind Summary

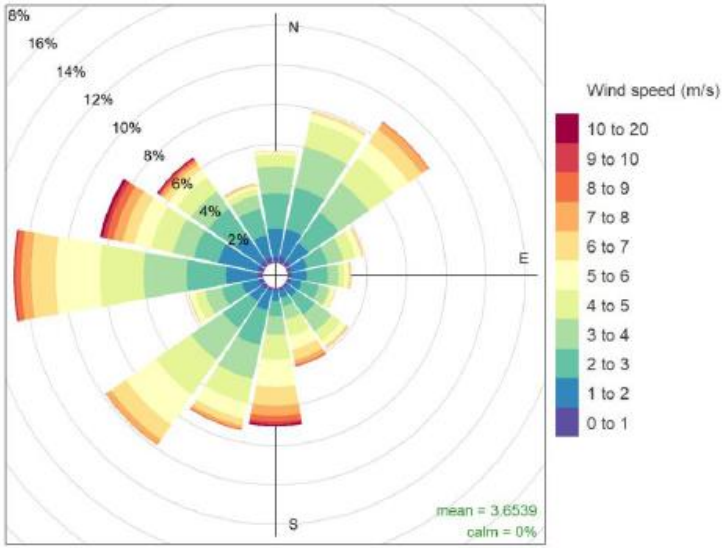
Northern Monitor



Frequency of counts by wind direction (%)

Wind rose for the 10-minute average winds recorded at PKCT northern monitoring site during the July 2016 to June 2017 period

Southern Monitor



Frequency of counts by wind direction (%)

Wind rose for the 10-minute average winds recorded at PKCT southern monitoring site during the July 2016 to June 2017 period

11.4 Appendix D: LDP16 Discharge Data Summary

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
07/07/2016	7.7	8	Not visible
08/07/2016	7.7	16	Not visible
20/07/2016	7.3	8	Not visible
03/08/2016	7.3	<5	Not visible
04/08/2016	7.5	8	Not visible
05/08/2016	7.3	7	Not visible
24/08/2016	7.7	<5	Not visible
25/08/2016	7.0	17	Not visible
29/08/2016	7.2	<5	Not visible
30/08/2016	7.6	<5	Not visible
02/09/2016	7.2	11	Not visible
30/10/2016	9.8	19	Not visible
10/11/2016	9	9	Not visible
12/11/2016	8.4	<5	Not visible
15/12/2016	8.7	21	Not visible
16/12/2016	8.2	7	Not visible
20/12/2016	8.6	10	Not visible
05/01/2017	7.8	8	Not visible
07/02/2017	8.5	12	Not visible
08/02/2017	8.7	9	Not visible
18/02/2017	8.4	27	Not visible
25/02/2017	9.4	13	Not visible
26/02/2017	9.2	30	Not visible
27/02/2017	8.6	33	Not visible
28/02/2017	7.2	28	Not visible
01/03/2017	7.1	12	Not visible
02/03/2017	7.0	18	Not visible
03/03/2017	7.3	25	Not visible
04/03/2017	7.1	14	Not visible
05/03/2017	7.2	<5	Not visible
15/03/2017	7.9	10	Not visible
16/03/2017	8.5	7	Not visible
17/03/2017	7.8	17	Not visible
18/03/2017	7.3	13	Not visible
19/03/2017	7.3	11	Not visible
23/03/2017	7.3	8	Not visible
24/03/2017	7.3	31	Not visible
26/03/2017	7.2	21	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
30/03/2017	7.5	<5	Not visible
31/03/2017	7.3	18	Not visible
02/04/2017	7.3	16	Not visible
03/04/2017	7.3	5	Not visible
04/04/2017	7.3	34	Not visible
10/04/2017	6.9	<5	Not visible
21/04/2017	9.1	<5	Not visible
23/04/2017	9.2	<5	Not visible
04/05/2017	8.6	<5	Not visible
20/05/2017	7.3	18	Not visible
04/05/2017	8.6	<5	Not visible
20/05/2017	7.3	18	Not visible
07/06/2017	8.3	15	Not visible
10/06/2017	7.3	24	Not visible
11/06/2017	7.2	10	Not visible
22/06/2017	7.3	9	Not visible

11.5 Appendix E: Weed Spraying Notification Form

Notification of Weed Spraying

Johnsons Landscapes

Date	7-3-17
Person/s Responsible	MICK WEED
Area to be sprayed	ALL AREAS
Start time	7.30 AM
Estimated duration	6 HOURS
Weather	FINE S.W WIND
Frog and Wildlife Inspection	(Yes) / No
General Comments	NO FROGS

Total amount of litres sprayed	600LTS
Type of spray used	Glycophosate 360 (Trademark Roundup) (Yes) / No
Other Type of spray used	N/A

SIGN OFF: WORK COMPLETED

Date: 7-3-17

Time: 2.30pm

Signature: ..... Print Name: MICK WEED

11.6 Appendix F: Triennial Independent Audit Findings and Action Plan

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

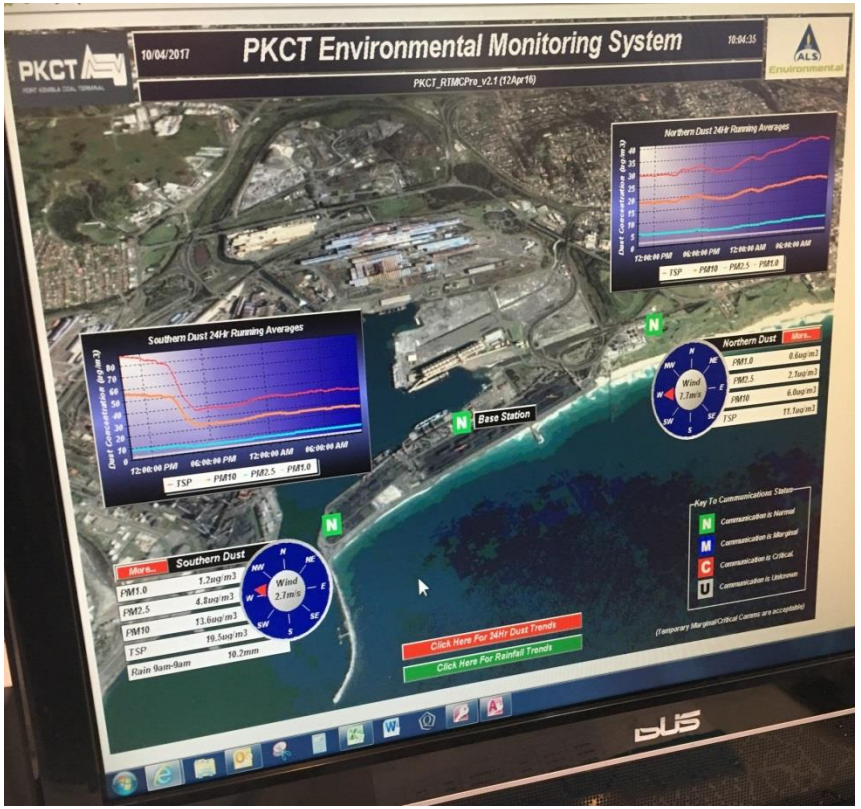
Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
DA 08_0009, S2.C7	The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been dispatched between the hours of: a) 7 am to 10 pm Monday to Friday; and 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.	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. 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 '*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*.' Toolbox talk records relating to a refresher of the PKCT DCC were sighted dated August 2016 and April 2017. It was reported that the NRE No 1 Colliery has an electronic boom gate which does not open until 7 am. 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. Monthly checks of compliance with the DCC were being undertaken by PKCT using the '*PKCT Task Coach & Observation Sheet: Truck Drivers Code of Conduct'*. 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	Compliant **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 receival from the NRE No.1 Colliery re-commences.	Finding accepted. **OFI-2017 06:** PKCT will work with its Shipper and associated Truck Company to implement a process to monitor compliance of truck movements along Bellambi Lane during coal transport to the Terminal. Action by: PKCT Environmental Specialist Completion Date: 31/08/2017

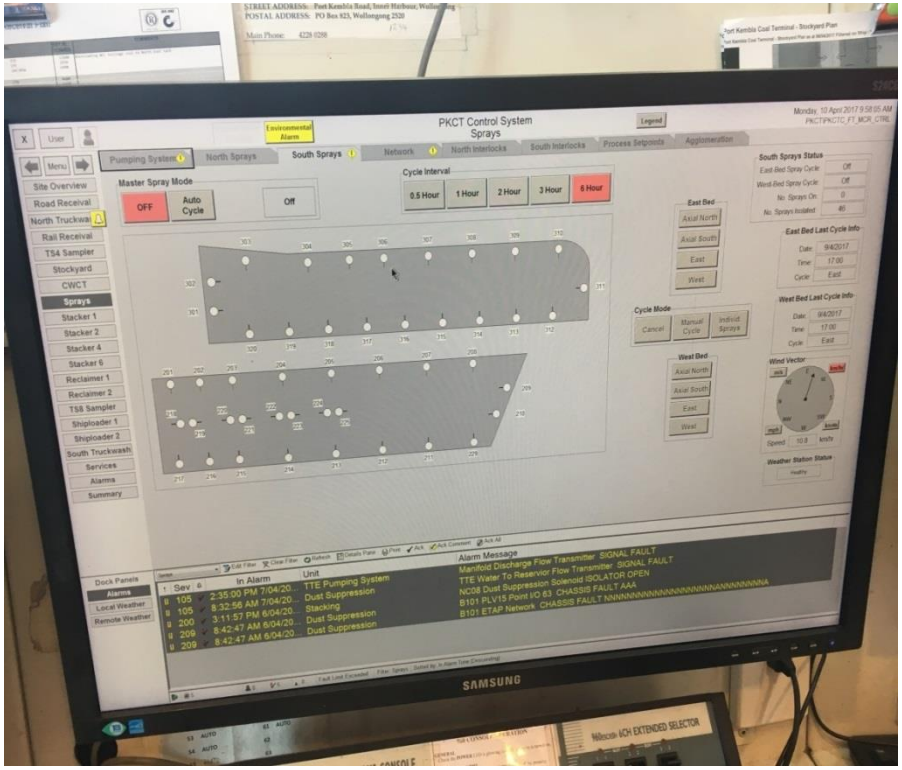
Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		all of these forms included the check of the time restrictions. Where that section was completed, no issues had been identified. It was reported that there has been no coal received from the NRE No 1 Colliery in the last 12 months.		
DA 08_0009, S2.C13	Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used on site is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	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. 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. 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. 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: • *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.	Non-compliant Low Risk	Finding accepted. PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has implemented remedial measures to limit the potential of future occurrences. PKCT continues to operate in alignment with its approved Policies, Procedures and Management Plans. PKCT continues to maintain accreditation to ISO14001 and ISO9001. The events and

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		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. A meeting invite dated 28 October 2014 included an agenda item for 'environmental sampling'. An email from the Environmental Specialist to shift managers on 12 November 2014 noted that the Water Sampling Procedure had recently been updated. 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.		associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.
DA 08_0009, S3.C2	Noise Monitoring Program The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must: a) be developed in consultation with DECC; b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and c) include a: – combination of attended and	<u>Preparation</u> 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. 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. 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. 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. 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. Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the NMP.	Preparation: Compliant **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	Finding accepted. **REC-2017-09** - PKCT will revise the Noise Management Plan to reflect that the by-annual noise monitoring is no longer required. The revised Management Plan will be updated with information outlining that PKCT will consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	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.	Implementation In general, it was considered that the NMP was being implemented. Refer also to S3.C3 below.	noise compliance surveys Implementation: Compliant	maximum noise levels) in any future noise compliance surveys. PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017
DA 08_0009, S3.C3	Continuous Improvement The Proponent shall: a) continue to implement all reasonable and feasible best practice noise mitigation measures; b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and c) report on these investigations and the implementation and effectiveness of these measures	Noise mitigation measures outlined in the NMP include: • Rail receival enclosed within a shed. • Road and Rail Receival 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. The rail receival shed and enclosed conveyors were observed during the site inspection. 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. One noise enquiry was received by PKCT from a nearby resident during the audit period. The	Compliant **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.	Finding accepted **OFI-2017-07** –The hanging metal tubes at the Northern Truckwash are a key safety device used to warn trucks that their trays are elevated before they return onto the public road network. PKCT will investigate the hanging metal tubes at the Northern Truckwash to assess

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	in the AEMR to the satisfaction of the Director General.	enquiry related to trucks use of compression breaking 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. No other enquiries or complaints relating to noise were recorded during the audit period. 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). 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*"		whether noise levels associated with them may be problematic. Action by: PKCT Environmental Specialist Completion Date: 31/12/2017
DA 08_0009, S3.C8	Operations The Proponent shall: a) ensure any visible air pollution generated by the project is both minimised and recorded, and	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: • 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	Compliant **OFI-2017-08 -** Consider modifying the display to align the north on the maps with north on the	Finding accepted. **OFI-2017-08 -** PKCT will work with its IT consultant to investigate and if possible modify the

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	that operations are modified as required to minimise any resultant air quality impacts on nearby residences; b) ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and c) where dust is generated by the project, that operations are modified and/or stopped as required to ensure compliance with the relevant air quality criteria to the satisfaction of the Director-General.	the water gun programs. • Meteorology from the on-site meteorological station is displayed in the control room via an alert screen (see below)  A minor recommendation for the display is to align the north on the maps with north on the	displays.	existing screen display interface to align the north on the maps with north on the displays. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		displays. The display shown could be misinterpreted as the North arrow is facing west across the site. 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.  Real time monitoring data is displayed in a number of locations throughout the site and was		

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		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. 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.		
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 *Protection of the Environment Operations Act 1997*.	A number of non-compliances with the EPL were reported during the audit period and therefore this condition has been assessed as non-compliant. Refer to assessment of compliance with L1.1 and L2.1 of the EPL.	Non-Compliant Medium Risk	Finding accepted. PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has implemented remedial measures to limit the potential of future occurrences. Specifically in response to early non compliances with water quality at the Terminal, PKCT has implemented the following during the audit period;

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
				• Completion of a $3.04 million upgrade to the Central Pond • Completion of a dredging program in the Settlement Lagoon • Testing and installation of a coagulant dosing facility at the Central Pond to assist with water clarification of highly turbid water if/when it occurs on site. • Installation of a belt washing station on Berth 102 Conveyor 14 which has significantly reduced coal spillage on the Berth The above improvements along with other initiatives have helped PKCT to

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
				improve and maintain discharge compliance from the Settlement Lagoon (LDP16) for 749 days (as of end of May 2017). PKCT considers that these improvements have been effective at improving compliance with Condition S3.C12. The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.
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-	<u>Preparation</u> 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. 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. 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	Preparation: Compliant **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	Findings accepted. **REC-2017-13 -** PKCT will revise the Water Management Plan to reflect the upgrades made to the Central Pond and include a revision if necessary of the site water balance.

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	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	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. 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. Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the WMP. <u>Implementation</u> 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: • 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) 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. 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	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	PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017 **REC-2017-14 -** PKCT will revise the Water Management Plan to - 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

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
	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.	systems were in place to manage surface water and monitor its effectiveness, this condition has been assessed as compliant.	Condition L2.5 of EPL 1625 only applies to LDP 16. Implementation: Compliant	1625. - Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
DA 08_0009, S3.C18	Greenhouse and Energy Efficiency Plan Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must: a) be prepared generally in accordance with the Guidelines for Energy Savings Action Plans (DEUS 2005, or its latest version); b) be submitted to the Director-General for approval; c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project; d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project; e) describe how the performance of these measures would be monitored over time; and	<u>Preparation</u> 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. 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". 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. 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. <u>Implementation</u> 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. PKCT receives detailed monthly electricity bills identifying usage which is transferred into a	Preparation: Compliant **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	Finding accepted. **REC-2017-15 –** PKCT will revise the Greenhouse Gas and Energy Efficiency Management Plan to reflect that the Energy Savings Action Plan Program has ended and identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions and energy use. PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017 **REC-2017-16**- PKCT will revise the Greenhouse

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	f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.	spreadsheet by the Environmental Specialist and used for analysing trends and AEMR reporting. AEMRs include greenhouse gas and energy efficiency information and include trends concerning reportable energy. 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*". The 2014/2015 AEMR (p.48) notes that "*Reportable energy consumption and greenhouse gas emissions have slightly increased at PKCT this reporting period*". 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*". 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). 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.	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. Implementation: Compliant	Gas and Energy Efficiency Management Plan to reflect the recommendations of REC-2017-16. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017
DA 08_0009, S3.C20	HAZARDS Dangerous Goods The Proponent shall ensure that storage, handling and transport of	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. 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	Compliant **OFI-2017-09 –** Investigate the option of providing secondary containment for the flocculent	Finding accepted **OFI-2017-09** - PKCT will investigate options for providing secondary containment for the

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	dangerous goods are done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	manifest quantity. 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 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. The 2015 / 2016 AEMR reported the following with regards to hazards monitoring: • 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.	Coreshell 71303 tank to offer additional protection from accidental release to the harbour	flocculent Coreshell 71303 tank to offer additional protection from accidental release to the harbour. If a feasible option is identified, PKCT will include the item in the FY19 Capital Expenditure budget and implement the improvements during that financial year. Action by: PKCT Environmental Specialist Completion Date: 1. Completion of review of secondary containment options 31/12/2017. 2. Feasible option to be implemented during FY19 financial year.

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		• 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, S4.C1	ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING Environmental Management The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must: a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General; b) provide for the strategic context for the environmental management of the project; c) identify the statutory requirements that apply to the project; d) describe the procedures that would be implemented to: – keep the local community and relevant agencies	<u>Preparation</u> PKCT prepared an Environmental Management Strategy which was submitted to the DP&E by letter 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. 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. Refer to Section 9 of the main report for an assessment of the adequacy of the Strategy. <u>Implementation</u> PKCT's Environment Management System has been certified to AS/NZS ISO 14001:2004 Environmental Management Systems standard. In maintaining its certification, the site undergoes surveillance audits on a six monthly basis. The auditors reviewed the most recent ISO 14001:2004 Surveillance Audit undertaken by Lloyd's Register LRQA on the 19 & 20 October 2016. 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. 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	Preparation: Compliant **REC-2017-12** - 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	Findings accepted **REC-2017-12 –** PKCT will revise the Environmental Management Strategy to include the recommendations listed under REC-2017-12. Action by: PKCT Environmental Specialist Completion Date: 16/09/2017

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	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; e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval; f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and g) describe the role, responsibility,	completed on the 23.01.17 and one for the Main Control Room completed on the 16.02.17. 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. Complaints were being managed as outlined in the Strategy (refer EPL M5.1) for further discussion of complaint management process). 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, 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. 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). Reporting was being implemented as outlined in the Strategy (AEMRs, EPL Annual Returns, EPL monthly reports, National Pollution Inventory).	- 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. Implementation: Compliant **OFI-2017-01:** Include a field in EMS for recording whether events have been notified to the EPA and other relevant	**OFI-2017-01:** PKCT will investigate options to update the EMS system interface to include a field for events that

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	authority and accountability of all the key personnel involved in the environmental management of the project.	The Strategy was being reviewed on an annual basis as specified within the Strategy. 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.	agencies	have been notified to the EPA. Action by: PKCT Environmental Specialist Completion Date: 31/10/2017
DA 08_0009, S4.C2	REPORTING Incident Reporting Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.	PKCT reported four incidents to the EPA Environment Line during the audit period relating to discharges of washdown water containing coal fines into Port Kembla harbour. The incidents were not considered to have caused material harm by PKCT. In response, the EPA issued two Formal Warnings and noted that whilst the incidents did not cause measureable environmental harm they had the potential to cause measureable environmental harm to the waters of Port Kembla. These incidents were not reported to the DP&E and other relevant agencies (other than the EPA) within 24 hours. The only reporting of these incidents to the DP&E was through the AEMR.	Non-compliant Low risk **REC-2017-01**: Ensure that incidents that cause or have the potential to cause material harm to the environment are also reported to the DP&E and other relevant agencies (in addition to the EPA) within 24 hours.	Finding accepted PKCT has a Pollution Incident Response Management Plan (PIRMP) in place that outlines the requirements of reporting any event that causes, or may cause, Material Harm to the environment to the relevant agencies. **REC-2017-01**: PKCT will ensure that any future incidents are assessed as per the requirements of the PIRMP and reported as required to the relevant agencies. A communication email will be sent to relevant

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				personnel reminding them of this requirement. Action by: PKCT Environmental Specialist Completion Date: email to be sent by 30/06/2017.
DA 08_0009, S4.C4	Annual Reporting Within 12 months of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-General and all relevant agencies. This report must: (a) identify the standards and performance measures that apply to project; (b) describe the works carried out in the last 12 months; (c) describe the works planned to be carried out in the next 12 months; (d) include a summary of the complaints received during the past year, and compare this to	Annual Environmental Management Reports (AEMRs) and Interim AEMRs were available for the periods 2013 / 2014, 2014 / 2015, 2015 / 2016. A letter from the DP&E dated 25 March 2014 noted that the Department had reviewed the 2013/2014 AEMR and was generally satisfied with the report noting that future AEMRs should include: • 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. 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. 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 *Post-approval requirements for State significant mining developments – Annual Review Guideline* (2015). The letter requested that the next AEMR be updated to include:	Compliant **OFI-2017-10** - Ensure that future AEMRs include: • 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	Finding accepted **OFI-2017-10 -** PKCT has received correspondence from the DPE requesting updates to the next AEMR. PKCT's next AEMR is due by 31st July 2017. PKCT will update the AEMR format to incorporate the recommendations made by the DPE. Action by: PKCT Environmental Specialist

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	the complaints received in previous years; (e) include a summary of the monitoring results for the project during the past year; (f) include an analysis of these monitoring results against the relevant: – impact assessment criteria/limits; – monitoring results from previous years; and – predictions in the EA or other documents listed in condition 2 of schedule 2; (g) identify and discuss all exceedences of approval and licence conditions and other applicable standards and performance measures; (h) identify any trends in the monitoring results over the life of the project; (i) identify any non-Compliant during the previous year; and (j) describe what actions were, or are being, taken to ensure Compliant.	• 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.	purposes of trend analysis.	Completion Date: 31/07/2017

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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.	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. 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. 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.	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.	Finding accepted **REC-2017-07 –** PKCT will continue to review its Management Plans annually as per the recommendation of the 2014 IEA. If a review of a Management Plan results in significant changes to the intent of the Plan, PKCT will resubmit those plans to the DPE as required. Action by: PKCT Environmental Specialist Completion Date: As necessary if significant changes are made during review of any Management Plans.
DA 08_0009, S4.C8	ACCESS TO INFORMATION Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these	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.	Non-compliant Low Risk **REC-2017-02 -** Ensure the website includes the most recent revisions of	Findings accepted. **REC-2017-02 -** PKCT will review all Management Plans and Strategies

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	strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall: (a) provide a copy of the relevant document/s to the relevant agencies; (b) place a copy of the document/s on its website; and (c) remove superseded copies of strategies/plans/programs from its website.	PKCT received email confirmation from the DP&E that relevant agencies include the EPA and Wollongong Council. 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. The 2014 / 2015 AEMR was provided to the DP&E by email dated 28.07.15 The 2015 / 2016 AEMR was provided to the DP&E on the 28.07.16 The 2014/2015 and 2015/2016 AEMRs were provided to the EPA and Wollongong City Council by emails dated 15.03.17. 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. 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). 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. 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. On the basis that not all of the required information was provided to all the relevant agencies	the Environmental Management Strategy and management plans. **REC-2017-03 -** Ensure the IEAs are published on the website **OFI-2017-04** –Consider changing the layout of the website to make it easier to navigate to the environmental management plans, monitoring reports,	available on PKCT's website to ensure that they are the most recent versions of documents. Action by: PKCT Environmental Specialist Completion Date: 30/06/2017 **REC-2017-03** – PKCT will update the website to include the completed IEAs. Action by: PKCT Environmental Specialist Completion Date: 30/06/2017 **OFI-2017-04** – PKCT will review the layout of the existing website with our IT consultants and investigate an alternate layout for the Website to improve ease of navigation for the

Condition No.	Condition / Requirement	Comment / Finding	Compliant Status & Recommendation	PKCT Response/Action
		and available on the PKCT website, this condition has been assessed as non-compliant.	AEMRs and IEAs.	public. Action by: PKCT Environmental Specialist Completion Date: Review and upgrade completed by 31/12/2017

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EPL 1625, L1.1	**LIMIT CONDITIONS** **Pollution of Waters** Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the *Protection of the Environment Operations Act 1997*.	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. 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: **1** Settlement Lagoon — LDP 16 — NA — 7,300 — Garungaty Waterway **2** TS1 Pond — LDP 22 — 4.3 — 1,550 — Settlement Lagoon	Non-compliant Medium Risk	Finding accepted. PKCT accepts that the items of non-compliance associated with this finding occurred as a result of specific events that occurred early in the reporting period. For each of the events, PKCT has liaised with the EPA and implemented remedial measures to limit the potential of future occurrences. Specifically in response to early non compliances with water quality at the Terminal, PKCT has implemented the following during the audit period; • Completion of a $3.04 million upgrade to the Central Pond • Testing and installation of a coagulant dosing facility at the Central Pond to

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action

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

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

- 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

assist with water clarification of highly turbid water if/when it occurs on site.

- Installation of a belt washing station on Berth 102 Conveyor 14 which has significantly reduced coal spillage on the Berth
- Upgrading of a launder system on Shiploader 1 to decrease blockages

The above improvements along with other initiatives have helped PKCT to improve and maintain discharge compliance from the Settlement Lagoon (LDP16) for 749 days (as of end of May 2017) and other areas across the Terminal.

PKCT considers that these improvements

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. 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. 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: • 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 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		have been effective at improving compliance with Condition EPL L1.1. The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.

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		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. 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. 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. 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.		
EPL 1625, L2.1 & L2.4	**Concentration Limits** 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. Water and/or Land Concentration Limits: **Point 16**	The following non-compliances were noted concerning concentration limits for the audit period: <u>2014:</u> • Five TSS limit non-compliances were recorded at LDP 16 on the following dates: – 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. <u>2015:</u> • Four TSS limit non-compliances were recorded at LDP 16 on the following dates: – 1 May 2015 = 60 mg/L, 10 May 2015 = 57 mg/L, 12	Non-compliant Low risk	Finding accepted Refer to finding EPL 1625, L1.1 for response.

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Pollutant	Unit of Measure	100 Percentile Concentration Limit
Oil & Grease	Visible	Not Visible
Total Suspended Solids	Milligrams per litre	50

May 2015 = 110 mg/L and 13 May 2015 = 54 mg/L.

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.

Improvements to the water management system have been conducted under PRP 12 – *Implement Upgrades to Stormwater Pollution Control System*. 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 *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. 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.

Other activities and improvements noted to the stormwater system during the reporting 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

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. 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.		
EPL 1625, O1.1	**OPERATING CONDITIONS** **Activities Must be Carried out in a Competent Manner** Licensed activities must be carried out in a competent manner. This includes:	PKCT has established processes for managing the processing, handling, movement and storage of coal including: • 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,	Non-compliant Low risk **REC-2017-04 –** Request from waste contractor that it provides the destination of waste	Findings accepted PKCT accepts that the item of non-compliance associated with this finding occurred as a

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
	a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	• 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 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). 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	taken off site. **OFI-2017-05 –** Update Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.	result of a rail audit that occurred early in the reporting period. PKCT has worked with the EPA and put processes in place, including an ongoing Environmental Improvement Program (EIP), to minimise the likelihood of further non-compliances at the rail unloading facility. Action by: PKCT Environmental Specialist Completion date: EIP ongoing **REC-2017-04 -** PKCT will request from the current waste provider information relating to the destination of all waste taken off site. PKCT will update the current monthly waste report to include this information. Action by: PKCT Environmental Specialist Completion Date:

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. 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. 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. 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). Waste oils were reportedly transported back to the Workshop and deposited into dedicated waste oil intermediate bulk containers (IBCs) (sighted during audit site inspection).		31/09/2017 **OFI-2017-05 –** PKCT will update the Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements. Action by: PKCT Environmental Specialist Completion Date: 31/09/2017

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
EPL 1625, O2.1	**Maintenance of Plant and Equipment** All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Refer to DA 08_0009 S2.C13	Non-compliant Medium Risk	Finding accepted Refer to comments under DA 08_0009 S2.C13
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.	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. 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. The following is noted: • 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	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.	Finding accepted During the reporting period, PKCT implemented a Pond Sediment Level monitoring process and associated Procedure. Due to the temporal nature of the sediment levels within the Ponds across the site, the process will take a number of years to fully "calibrate" and understand the rates of infill for each pond. PKCT will continue to utilise its Pond Sediment Level Monitoring Procedure to manage

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. Given the reported Annual Return non-compliance for the period 2015 / 2016 this condition was found to be non-compliant.		sediment levels in the ponds and ensure compliance with Condition 04.2 of EPL1625 **REC-2017-05** – PKCT will Update the Pond Sediment Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet. Action by: PKCT Environmental Specialist Completion Date: 30/09/2017
EPL 1625, M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken;	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. 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	Compliant **OFI-2017-11 -** Ensure the contractor undertaking the depositional dust monitoring includes a record of the time the depositional dust gauges were collected.	Finding accepted **OFI-2017-11 –** PKCT will liaise with our contractor undertaking the depositional dust monitoring to ensure they include a record of the time the depositional dust

<table>
<tr><th>Condition</th><th>Condition Requirement</th><th>Comment / Finding</th><th>Compliance Status & Recommendation</th><th>PKCT Response/Action</th></tr>
<tr><td></td><td>and

d) the name of the person who collected the sample.</td><td>Standard requires that sampling is conducted every 30 days +/- 2 days, however for completeness it should be included on the dust sheet.</td><td></td><td>gauges were collected.

Action by: PKCT Environmental Specialist

Completion Date: 31/07/2017</td></tr>
<tr><td>EPL 1625, M2.1 and M2.2</td><td>Monitoring Concentration of Pollutants Discharged and Air Monitoring Requirements

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.

Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19
<table><tr><th>Pollutant</th><th>Unit of Measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates – Deposited Matter</td><td>Grams per square metre per month</td><td>Monthly</td><td>AM-19</td></tr></table>
Point 20, 21
<table><tr><th>Pollutant</th><th>Unit of Measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td rowspan="2">Micrograms per cubic</td><td rowspan="2">Continuous</td><td rowspan="2">Continuously</td></tr><tr><td>PM2.5</td></tr></table></td><td>Particulates – deposited matter was using dust deposition gauges at the specified locations (Pointe 1-9, 12, 15, 17, 18, 19). TSP, PM_{10} and $PM_{2.5}$ monitoring was conducted using OSIRIS instruments located north and south of the coal terminal (Points 20 and 21).

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:

• 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</td><td>Non-compliant

Low risk</td><td>Finding accepted.

PKCT has reported the non-compliances associated with this finding to the EPA through the Annual Return Reporting process. Actions have been implemented to minimise the likelihood of further non compliances.

The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</td></tr>
</table>

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
	Total Solid Particles — metre	level and although a technical non-compliance, the reaction to the outages appears reasonable. Due to the non-compliances with this requirement reported in the Annual Returns, this condition has been assessed as non-compliant.		
EPL 1625, M2.3	Water and/ or Land Monitoring Requirements **Point 16** **Pollutant** / **Unit of Measure** / **Frequency** / **Sampling Method** Oil & Grease — Visible — Daily During Any Discharge — Visual Inspection pH — pH — Grab Sample TSS — Milligrams per litre **Point 22,23,24,25,26** **Pollutant** / **Unit of Measure** / **Frequency** / **Sampling Method** Oil & Grease — Visible — Daily During Discharge — Visual Inspection pH — pH — Grab Sample TSS — Milligrams per litre	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. 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. PKCT reported in its 2014-15 Annual Return that there was one instance (13.02.15) where a sample was misplaced and as a result there was insufficient water to undertake a TSS analysis. Section 66(6) of the POEO Act requires holders of an EPL to make any pollution monitoring data obtained in compliance with any monitoring conditions attached to their EPL publicly available. The EPL 1625 Monthly Environment Report available on PKCT's website includes results of monitoring at LDP16 but not of the other wet weather discharge points.	Compliant **OFI-2017-12 –** Review the requirements of the POEO Act for publishing monitoring data	Finding accepted **OFI-2017-12 –** PKCT has reviewed the requirements of the POEO Act for publishing monitoring data and will include overflow monitoring results for all wet weather discharge points in its monthly web publications. Action by: PKCT Environmental Specialist Completion Date: 31/07/2017

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
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.	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: • 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.	Compliant **OFI-2017-13** - Consider adding the following fields to the 'Event Report' to ensure they are always captured: • method by which complaint was made; • complainant personal details	Finding accepted **OFI-2017-13** - PKCT will work with its IT consultant to investigate whether the following fields can be added to the EMS "Event Report" interface; • method by which complaint was made; • complainant personal details Action by: PKCT Environmental Specialist Completion Date: If feasible, PKCT will incorporate the changes by 31/12/2017
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	Bi-annual attended and unattended noise monitoring was undertaken at identified residences during the audit period until April 2016. 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	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.	Finding accepted **REC-2017-08** - PKCT has initiated discussions with the EPA in regards to this finding. PKCT will formally request a variation to EPL 1625 to remove the requirement for bi-annual noise

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
	Limit Conditions section of this licence.	however it was reported that the EPA did not formally respond to the request. As formal EPA approval to remove the requirement for monitoring could not be demonstrated, this condition could not be verified.		monitoring as permitted by EPL Condition M7.2. Action by: PKCT Environmental Specialist Completion Date: Formal request to EPA to be made by 31/08/2017.
EPL 1625, R2.1	**Notification of Environmental Harm** Notifications must be made by telephoning the Environment Line service on 131 555. 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.	The following notifications were made to the Environment Line during the audit period: • 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. In addition the following were reported to PKCT's local EPA officer: • 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	Non-compliant Low risk **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).	Finding accepted **REC-2017-06 -** PKCT will Revise the Incident Reporting and Investigation Procedure PR.HS.124 to include further guidance on determining material harm to the environment (as per Section 147 of the POEO Act). Action by: PKCT Environmental Specialist Completion Date: 30/09/2017

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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'. 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.		
EPL 1625, R4.2	**Wet Weather Overflow Reporting** The following must be submitted to the EPA with the Annual Return: 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. The following information must be provided for each overflow: • a tablular presentation of the concentration of each pollutant specified in Condition M2.3; • date and time of the commencement of	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: • 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). 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: • 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.	Compliant **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.	Finding accepted **OFI-2017-14** – PKCT has updated the EPL Water Quality Data spread sheet to include a column that indicates whether samples were taken during an overflow event or were part of the routine monitoring program. Action by: PKCT Environmental Specialist

Condition	Condition Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
	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.	The report(s) included: • A tablular 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. 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.		Completion date: Action Complete.

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PKCT Drivers Code of Conduct 006	Limit speed to 50km/hr on Bellambi Lane.	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. 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. 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	Compliant **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: - 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. **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.	Findings accepted **OFI-2017-15 –** PKCT will review the format of the DCC Monthly Report to request more specific information from the transport companies where applicable. Action by: PKCT Environmental Specialist Completion Date: DCC Monthly Report updated and distributed to transport companies by 31/09/2017. **OFI-2017-16 –** PKCT will review the DCC Monthly Report format to incorporate dates that audits were undertaken by the trucking companies. Action by: PKCT Environmental Specialist Completion Date: 31/09/2017.

Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. 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. An opportunity for improvement exists to include more specific DCC requirements within the DCC Monthly Report and ensuring that the transport companies are		

Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		completing the reports adequately.		
PKCT Drivers Code of Conduct 009	Utilise the truck wash at PKCT after tipping.	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. 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. A second supplemental truck wash	Compliant **OFI-2017-17** - Consider introducing a process for monitoring trucks exiting the truck wash to ensure the effectiveness of the facility.	Finding accepted **OFI-2017-17** – PKCT will review the existing monitoring systems and auditing schedules to assess whether practical improvements can be made to the current monitoring process. Action by: PKCT Environmental Specialist Completion Date: 31/12/2017

Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. No complaints or incidents have been recorded by PKCT during the audit period relating to unwashed trucks leaving the site.		
PKCT Drivers Code of Conduct 011	Operate the vehicle in a manner that minimises vehicle noise.	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. 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. One enquiry about truck noise on Port Kembla Road was received by	Compliant **OFI- 2017-18 -** Include a check of operating vehicles to minimise noise within the Internal Audit Worksheets.	Finding accepted **OFI- 2017-18 –** PKCT will update the Internal Audit Worksheet to include a check of operating vehicles to minimise noise. The Worksheet will be updated prior to the next annual audit. Action by: PKCT Environmental Specialist Completion Date: Audit Worksheet updated by 31/08/2017

Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		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. No complaints or other incidents have been recorded by PKCT during the audit period relating to truck noise.		
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.	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	Non-compliant Low risk Refer to **OFI-2017-15**	Finding accepted Refer to **OFI-2017-15** for actions.

Condition No.	Condition / Requirement	Comment / Finding	Compliance Status & Recommendation	PKCT Response/Action
		roads. 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. 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		

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

Condition	Requirement	Verification/Comment	Compliance Status & Recommendation	PKCT Response/Action
SoC 2	**Community Relations** Continued operation of the PKCT Community Consultative Committee.	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	Finding accepted **OFI-2017-19** – PKCT will include CCC meeting minutes on the PKCT website. Action by: PKCT Environmental Specialist Completion Date: 31/07/2017

#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation	PKCT Response/Action
10	O4.1	*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).*	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	Finding Accepted **OFI-2017-20** - PKCT will update the Settlement Lagoon Cleanout Process document. Action by: PKCT Environmental Specialist Completion Date: 31/08/2017
13 & 14	O3.1 O3.2	*It is recommended that PKCT:* - *Conduct an internal review of compliance to conditions O3.1 and O3.2 relating to dust emissions beyond the boundary of the site.* *Review the train receival system to ensure all reasonable and feasible measures are employed to prevent or minimise dust impacts beyond the rail loop.*	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. 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. 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.	Ongoing	Finding Accepted PKCT submitted EIP U2 "Use of Real Time Particulate Monitoring Data for Operational Control" to the EPA by the due date of 28th April 2017. PKCT has received email correspondence from the EPA that it has accepted the review and associated actions and will remove the EIP from PKCT EPL. The EIP U1 "Particulate Matter Control Best Practice Study" is currently in progress and will be submitted by the due dates

#	Condition #	2014 IEA Recommendations	2017 Update - Assessment by AECOM	2017 - Status of Recommendation	PKCT Response/Action
					as descried in PKCT's EPL.

Source	#	Recommendation/Opportunity for Improvement	PKCT Response/Action
Site observation	OFI-2017-02	Consider more permanent labelling of the pipes for easy identification.	**OFI–2017-14 –** PKCT will install permanent labels on the inflow pipes to improve identification of the inflow routes to the Settlement Lagoon. Action by: PKCT Environmental Specialist Completion Date: 31/10/2017
Noise Management Plan	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.	**REC-2017-09** – Refer to DA 08_0009, S3.C2, for PKCT response/actions.
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.	**REC-2017-10** – PKCT will review the DCC to reflect the current road environmental conditions and better present concepts and requirements contained within. The revised DCC will be submitted to the DP&E for permission to supersede the existing DCC. Action by: PKCT Environmental Specialist Completion Date: 30/09/2017
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.	**OFI-2017-03** – As part of the DCC review, PKCT will look for ways where practical to do so, to increase the use of technology to monitor DCC compliance. Feasible system and process upgrades will be undertaken across the coming audit period. Action by: PKCT Environmental Specialist Completion Date: Any identified improvements will be implemented by the next IEA in April 2020.

Management Plans (general)	REC-2017-11	A document revision section should be included on all management plans so that the period between reviews as well as which section/area of the plan has been revised can be identified.	**REC-2017-11** – Document revision is currently tracked through PKCT's SharePoint document management system, however to improve visibility, PKCT will incorporate a document revision section on all management plans. Action by: PKCT Environmental Specialist Completion Date: 30/09/2017
Environmental Management Strategy	REC-2017-12	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.	**REC-2017-12** - Refer to DA 08_0009, S4.C1, for PKCT response/actions
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.	**REC-2017-13** - Refer to DA 08_0009, S3.C13, for PKCT response /actions.
Water Management Plan	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	**REC-2017-14** – Refer to DA 08_0009, S3.C13, for PKCT response/actions.

		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.	**REC-2017-15** - Refer to DA 08_0009, S3.C18, for PKCT response/actions.
Greenhouse Gas and Energy Efficiency Management Plan	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.	**REC-2017-16** - Refer to DA 08_0009, S3.C18, for PKCT response/actions
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.	**REC-2017-17 –** PKCT will update the PIRMP to ensure that referenced Figures correlate with those presented in the plan. Action by: PKCT Environmental Specialist Completion Date: 31/12/2016
2014 IEA OFI carried forward	OFI-2017-20	Update the Settlement Lagoon Cleanout Process document	Refer to Table 14, Item No. 10, Condition No. O4.1 for PKCT response/actions.

11.7 Appendix G: ISO 14001 and 9001 Certificate

Lloyd's Register LRQA

CERTIFICATE OF APPROVAL

This is to certify that the Quality & Environmental Management System of:

Port Kembla Coal Terminal Limited
Port Kembla Road
Wollongong, New South Wales
Australia

has been approved by Lloyd's Register Quality Assurance Limited
to the following Quality & Environmental Management System Standards:

AS/NZS ISO 9001:2008
AS/NZS ISO 14001:2004

The Quality & Environmental Management System is applicable to:

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

Approval
Certificate No: MEL0928466

Original Approval: 02 February 1994
Current Certificate: 18 November 2015
Certificate Expiry: 14 September 2018

M. T. [illegible]
Issued by: Lloyd's Register Quality Assurance Limited

JAS-ANZ

Level 6 Fawkner Centre, 499 St Kilda Road, Melbourne, Vic, 3004
This approval is carried out in accordance with the LRQA assessment and certification procedures and monitored by LRQA.
To confirm the validity of the accreditation for this certificate please visit www.jas-anz.org/register