



Waste Management Plan



Version	Date	Reviewer	Comments
5	16 th August 2017	Luke Pascot	Review following 2017 Triennial Independent Audit recommendations.
6	25 th February 2019	Luke Pascot	Annual review, no material changes, only changes to PKCT roles.
7	30 th June 2020	Luke Pascot	Annual review, update to regulator names, no other changes.

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1. Introduction

1.1 Purpose

The purpose of this Waste Management Plan is to identify implementation and management requirements for the minimisation and management of waste streams at Port Kembla Coal Terminal (PKCT).

This plan has been prepared to ensure the ongoing ability of PKCT to manage waste ensuring successful deposit of different waste materials to prioritise reuse or recycling rather than disposal. In addition, the monitoring and reporting required by this Plan will provide data for PKCT's use during preparation of the Annual Environmental Management Report required by the Department of Planning, Industry and Environment (DPI&E)'s approval conditions (refer to Section 5.3) for waste reporting.

1.2 Background

PKCT provides a coal and bulk products receipt, storage and ship loading service to customers whom predominantly constitute mining companies in the NSW Southern and Western Coal Fields. PKCT is located on the northern side of the port of Port Kembla inner harbour and operates on land leased from the Port Kembla Port Corporation.

PKCT has been operating since August 1990 and holds an Environment Protection Authority Environmental Protection Licence (EPL) number 1625.

In June 2009, the DP&E set new approval conditions for PKCT's operations as part of the development consent under Part 3A of the Environmental Planning & Assessment Act 1979 for PKCT's Existing Operations & Increased Road Receipt Hours Major Development application (08_0009). This consent includes a requirement for waste reporting to the DP&E.

1.3 Scope

This Management Plan applies to the PKCT premises and activities. The scope is to monitor PKCT waste management and minimisation activities, investigate opportunities to reduce waste and implement suitable procedures. The waste monitoring will provide a data source for preparation of the Annual Environmental Management Report (AEMR) to DPI&E.

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2. Objectives

The objectives of this Management Plan 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 this management plan 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.

3. References

The following documents are relevant to this Management Plan:

- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations Regulation (Waste) 2005
- Waste Avoidance & Recovery Act 2001
- Dangerous Goods Act 1975
- [Environment Protection Authority Website – Waste Tracking Requirements](#)
- Tickit – Access to PKCT Site Obligations and Legislation
- [Trade Waste Permit 33844](#)
- [Trade Waste Discharge to Sewer PR.HS.296](#)
- Enviroessentials [EnviroLaw SafetyLaw website](#) (access to legislation)
- DoPE Part 3A [Project Approval 08_0009](#) for PKCT Existing Operations & Increased Road Receiving Hours.
- [Contractor Minimum Requirements for Working Onsite PO.CM.496](#)
- [Water Management Plan MP.HS.462](#)

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4. Responsibilities

Superintendents and Shift Supervisors are responsible to the Operations Manager to ensure good housekeeping practices are employed in PKCT operations and shift maintenance activities which minimise the generation of waste and meet the waste management requirements outlined in this Management Plan.

The Engineering Superintendent shall ensure that contracts are in place for general waste, steel scrap, paper and cardboard to meet the waste management requirements outlined in Section 7 of this Management Plan.

The Engineering Superintendent is responsible for management of liquid waste, trade waste, asbestos waste and landscaping waste generated on site (refer Section 7).

Environmental Specialist is responsible to the HSE Superintendent to monitor waste streams, trends and check records for inclusion in Annual Environmental Management Reports and other reports which may be needed from time to time.

Site personnel controlling work shall be responsible to ensure the following;

- Good housekeeping practices are employed in work undertaken under their control which minimise the generation of waste and meet the waste management requirements outlined in this Management Plan.
- That any demolition, building or construction waste generated on site is disposed appropriately to promote reuse or recycling rather than disposal as outlined herein.

5. Legislation and Other Requirements

5.1 Legislative Requirements

PKCT's activities are defined as a 'Scheduled Activity' under the Protection of the Environment Operations (POEO) Act 1997 (refer to Clause 10, Part 1 of Schedule 1 of POEO Act). Clause 48 of this Act requires PKCT to hold an Environmental Protection Licence (EPL) issued under the authority of the POEO Act. PKCT hold EPL 1625 which limits emissions to air and water from the PKCT premises but currently does not have any waste requirements. Scheduled activities referenced on the EPL pertain to Coal Works and Shipping in Bulk.

The Protection of the Environment Operation Regulation (Waste) 2005 stipulates that transportation of certain waste types must be tracked. This applies to waste defined in Schedule 1 to this Regulation. PKCT will ensure that any waste streams from its premises that are scheduled have appropriate tracking in place and the waste is disposed of by an EPA licenced waste contractor.

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The Waste Avoidance and Recovery Act 2001 provides a framework for the NSW State Government to legislate large scale waste management frameworks and generally applies to the 'polluter pays' principal of making a manufacturer responsible for the product during its entire lifecycle. An example of this is an electrical goods manufacturer having to pay for disposal of the item they produce. Whilst this Act does not specifically apply to PKCT some of the objectives of this Act are relevant to this Management Plan. These are;

3 Objects of Act

The objects of this Act are as follows:

- (a) to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development,
- (b) to ensure that resource management options are considered against a hierarchy of the following order:
 - i. avoidance of unnecessary resource consumption,
 - ii. resource recovery (including reuse, reprocessing, recycling and energy recovery),
 - iii. disposal,
- (c) to provide for the continual reduction in waste generation,
- (d) to minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste.

Whilst it is not a direct legislative requirement, this Management Plan takes guidance from item (b) above and seeks to avoid waste in the first instance and if impossible reduce waste through reuse, reprocessing, recycling or recovery (of energy or component parts) prior to disposal. This Management Plan also seeks to achieve items (a), (c) and (d) through reviewing waste generation to promote reduction opportunities and to reduce consumption through good practice and staff education.

The Environmentally Hazardous Chemicals Act 1985 (NSW) allows the Environment Protection Authority to declare substances to be chemical wastes and issue 'chemical control orders' to regulate the disposal of that type of waste. Licences to carry out activities prohibited by chemical control orders must be obtained from the Environment Protection Authority. These 'chemical control orders' may regulate activities such as the manufacture, processing, conveying, buying, selling or disposal of the chemical or declared waste. Chemicals, for which a 'chemical control order' has been made, are referred to as environmentally hazardous chemicals.

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The Environmentally Hazardous Chemicals Regulation 1999 (NSW) sets various fees in relation to the assessment of technology and prescribed activities by the EPA and in relation to licences to carry out prescribed activities and specifies the matters to be included in applications for assessment of prescribed activities.

The Environmental Guidelines: Assessment, Classification & Management of Liquid & Non Liquid Wastes defines hazardous substances and outlines the aspects which pertain to their collection, storage, labelling, and management of liquid and non liquid wastes.

5.2 Environmental Protection Licence Requirements

The following extracts from PKCT's EPL 1625 relate to waste;

L3 Waste

- L3.1 The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.
- L3.2 This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.

and, part b of Condition O1.1 below.

O1 Activities must be carried out in a competent manner

- O1.1 Licensed activities must be carried out in a competent manner.
This includes:
- the processing, handling, movement and storage of materials and substances used to carry out the activity; and
 - the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

PKCT ensures compliance to these Conditions by utilising the processes outlined within Section 5.4 to 5.6.12 of this document.

5.3 DP&E 2009 Development Consent

The following extract from the Part 3A development consent (08_0009) identifies PKCT requirements:

Waste Operating Conditions 19. The Proponent shall

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- (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.

This Management Plan is designed to meet these requirements by capturing relevant data and undertaking necessary actions.

5.4 Consultation

None necessary for this Management Plan.

5.5 Management Strategies

5.6 Operational Activities and Potential Issues

As a general principle, activities carried out on site shall be set up, planned and controlled to minimise the generation of waste. If generated, waste shall be kept separate, contained and disposed of in accordance with legal requirements. Waste generated on site shall be managed as follows;

- Reuse on site or reprocess e.g. screen spillage coal
- Offsite disposal for recycling or reuse e.g. waste oil, scrap steel
- As a last resort, offsite disposal e.g. rubbish to council land fill.

Waste may be collected via general site bins. These bins are managed under a site waste management contract. Waste quantities, waste streams and modes of disposal are monitored and reported to PKCT under these contract arrangements. This is done on a monthly basis. The Environment Specialist is included in the report transmission.

Project related waste may also be generated where waste is disposed of directly or collected in project specific bins or locations on site. Project supervisors shall note the provisions herein. Reference is also made to [Contractor Minimum Requirements for Working Onsite PO.CM.496](#) which pertains. Project supervisors shall keep records and convey waste data when requested by the Environmental Specialist, or at a minimum annually in a timely manner to enable end of financial year reporting. The Annual Environmental Management Report is due for submission to the Department of Planning and Environment at the end July.

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5.6.1 Waste Oil and Lubricants

PKCT personnel and/or contractors are engaged by PKCT to carry out tasks on site involving handing, transport, transfer and exchange of fuel, oils and lubricants with care to avoid spills into waterways or land. Waste oils shall be carefully transported back to the workshop area or disposed of directly by an EPA licensed waste disposal contractor.

Waste oil shall be returned to the Workshop and deposited into intermediate bulk containers (IBC) located there designated for waste oil to be recycled.



Waste Oil IBCs-north west corner of workshop

Other oil contaminated items or designated empty containers e.g. oily rags, oil filters, aerosol containers shall be collected in designated bins in the workshop. EPA licenced service provider shall periodically empty the bins and arrange disposal. Site personnel shall take care to put the appropriate items in the designated bins and avoid cross contamination.



Designated waste bins- north west end of the workshop

In accordance with Section 7.1.12 of this Management Plan, if applicable, receipts shall be supplied by the contractor collecting waste for disposal and retained in a secure location as determined by the manager responsible.

The waste oil storage tank forms part of the combustible liquids storeroom located in the Store Building. The quantity stored and type of oils (i.e. combustible liquids- diesel, engine oils) which are stored in this location are not designated as a Dangerous Goods requiring licensing by Workcover. Accordingly, under no circumstances will Class 1 to 9 Dangerous Goods (e.g. petrol or other flammable liquids) be stored in this storeroom.

If a Class 1 to 9 Dangerous Good is required to be collected, stored and disposed of, for example due to a leak, spill or contamination, expert external advice shall be sought from EPA licensed waste disposal contractor, consultant or WorkCover to ensure disposal is carried out in a safe and environmentally acceptable manner.

Oil contaminated components shall be taken to the workshop and excess oil allowed to drain into the waste oil container adjacent to steam cleaning bay. Components may then be discarded into rubbish bins.

Empty oil drums shall be stored opposite the steam cleaning bay on the southern side of the store against the wall. It is important the drum lids are in place to avoid ingress from rain.

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Once the quantity gets to 10 to 12, the Storeman shall contact an EPA licenced service provider to collect the drums and dispose of them. Service provider shall recycle the drums wherever possible. Damaged drums shall be cleaned and recycled as scrap steel.

5.6.2 Trade Waste

Trade waste shall be managed in accordance with the PKCT [Trade Waste Discharge to Sewer PR.HS.296](#) procedure and as outlined in this Management Plan. It shall be collected and disposed of by an EPA licensed contractor. Trade waste certificates shall be obtained and filed by the PKCT Environmental Specialist.

5.6.3 General Rubbish and Scrap Metal

Supply of bins and the disposal of general rubbish and scrap metal on site shall be carried out by contract. Separate bins shall be provided for general rubbish and scrap metal and placed at appropriate locations on site. The Business Services Manager shall ensure a contract is in place under which this is done. Contractors shall collect and dispose of waste. All personnel on site shall ensure that waste is placed in the appropriate bins to avoid contamination.

5.6.4 Green Waste

Where practical, green waste shall be kept separate from other forms of waste and either disposed of at Council's green waste facility or reused on site as mulch. Noxious weeds shall be disposed of in accordance with Council requirements. Special requirements may apply to some types of weeds. For example, bitou bush will not be accepted as green waste and is required to be directed to landfill.

The person responsible for arranging any contract landscaping work or PKCT team members undertaking any "in house" landscaping or gardening work shall ensure compliance with waste requirements in this Management Plan.

5.6.5 Demolition and Construction Waste

Demolition and construction waste shall be kept separate and placed in a location convenient for disposal. Opportunities shall be taken to use such material on site where practical. Offsite disposal shall be to a Council approved tip.

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5.6.6 Asbestos Waste

Asbestos identified for disposal shall be collected and disposed of by a licensed contractor. Handling, wrapping and storage for collection shall be in accordance with the [Work health and Safety Act](#) and associated regulation.

5.6.7 Paper/ Cardboard Waste

Wherever practical, paper and card board waste shall be collected for reuse. The PKCT Business Services Manager shall ensure a contract is place for the collection and disposal of paper and cardboard for reuse or recycling.

5.6.8 Water Conservation & Reuse

PKCT requires water to operate. A significant portion of the water used on site is for environmental purposes e.g. stockpile spraying for dust suppression. All personnel on site shall use water responsibly to ensure PKCT's environmental and other standards are met with the acknowledgement that water is a valuable community resource.

Opportunities shall be sought, where practical, to identify and implement water reuse initiatives to reduce the level of PKCT's water usage. [Water Management Plan MP.HS.462](#) is in place covering water use on site. Water usage is tracked and reported through the Annual Environmental Management Report.

5.6.9 Hazardous Materials

Method of disposal of any disused/left over chemicals shall be determined with reference to appropriate regulatory authority to confirm legal requirements are met and ensure it is done in an environmentally acceptable manner. Wollongong City Council, WorkCover, EPA or Sydney Water are key regulatory bodies who may assist.

5.6.10 Used Batteries

Used batteries shall be recycled as follows:-

- Service providers engaged to service and replace batteries on site shall ensure used battery are removed from site and disposed to a recycling facility.
- For batteries maintained by PKCT, used batteries shall be deposited to the store. Store will make arrangements for their offsite disposal to a recycling facility.
- Small batteries used by site personnel shall be collected in designated containers and periodically conveyed to the Store for offsite disposal to a recycling facility.

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5.6.11 Illegal Waste Dumping and Unauthorised Waste

Deposition of waste on PKCT's premises or in PKCT's waste collection facilities from sources external to PKCT is prohibited. Such unauthorised activities impart costs on PKCT, may present a hazard to site personnel and is unacceptable.

If such activities are observed, action shall be taken to intervene/ report as appropriate. Where possible, record details e.g. vehicle registration number. If unauthorised waste is identified, precautions need to be taken as the origin of the material isn't known. If necessary, restrict access and notify the Team Supervisor in the first instance. Particular care is required if material appears hazardous e.g. asbestos. Material shall be quarantined and a specialist, appropriately licensed service provider shall be arranged to assist in its identification and removal.

5.6.12 Legal Requirements: Waste Tracking

Certain wastes must be tracked in accordance with the [PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997](#). With reference to [EPA Waste Tracking Requirements](#), PKCT does not have (or require) an EPA waste licence but is required to obtain receipts from the contractor confirming acceptance of the waste. Wastes generated on site which fall into this category are as follows:-

- (a) Waste Oil (refer Section 7.1.1 herein)
- (b) Trade Waste (refer Section 7.1.2 herein).

Other wastes may be generated either through accident, contamination or in the introduction of new processes. The legal requirements for a waste shall be determined with reference, if required, to the relevant statutory authority and/or an EPA licensed contractor with expertise in the correct handling and disposal of the waste. Waste shall then be disposed of in accordance with these requirements.

5.7 Environmental Aspects and Impacts

The proposed works in this Management Plan will not generate any unacceptable environmental impacts as all waste management activities will be undertaken with suitable safety precautions, mitigation measures or procedures in place. Waste related aspects are included in PKCT's [Environmental Aspects and Impacts Register RG.HS.262](#).

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5.8 Management and Mitigation

This Management Plan is the responsibility of the PKCT Environmental Specialist. This employee will liaise with PKCT staff and waste contractors to ensure that appropriate waste management actions are undertaken (including minimisation and appropriate designation for re-use, recovery or recycling). The HSE Superintendent will be responsible for implementation of this Management Plan.

5.9 Management Strategy, Effectiveness and Improvement

Waste management at PKCT is undertaken through the identification of waste and designation into categories to allow suitable direction for reuse, recycling or disposal. Section 5.6.1 to 5.6.12 describes the different types of waste generated at the PKCT premises, Table 1 below reviews these and identifies where the waste is directed.

Table 1 – Waste Type & Direction

Waste Type	Directed To
Oil and Lubricants	Waste disposal (limited opportunity for reuse)
Trade Waste	Waste disposal
General Rubbish & Scrap Metal	Recycling or landfill
Plant and vegetation	Reuse on site or recycling
Demolition & Construction	Reuse on site, recycling or landfill
Paper and Cardboard	Reuse on site or recycling
Water	Reuse on site or disposal
Hazardous Materials	Disposal in accordance with legal requirements
Batteries	EPA licensed disposal facility

PKCT staff involved in waste generating activities will be consulted as needed to identify and discuss opportunities to reduce generation and increase on site reuse. Any new opportunities identified will be assessed for suitability, and if successful, be included in this Management Plan and implemented. PKCT Management will review the outcomes of these waste minimisation activities as necessary, and at least annually, through the Annual Environmental Management Reporting process.

To ensure the correct direction of waste, appropriate receptacles shall be located at strategic positions around the PKCT premises. This practice will be continued and reviewed as needed to determine if placement remains appropriate and receptacles are correctly sized for the amount of waste generated.

PKCT will maintain notices within staff areas reminding employees and contractors to consider waste generation and disposal during their activities. This will assist ongoing staff education relating to waste management. If any significant waste management policies

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change, PKCT shall inform staff as appropriate to achieve continued successful waste management.

The effectiveness of the waste management in reduction of waste and increase of reuse or recycling will be monitored by PKCT and reported through Annual Environmental Management Reports.

6. Event Management

Some PKCT waste types have a potential for environmental contamination or personal injury if spilt or not adequately contained.

If spills or leakage occur, good housekeeping practices shall be applied. Depending on the extent and potential impact of a spill, emergency measures shall be implemented as outline in PKCT Policy [MP.HS.79 Emergency Management Plan](#) and [Pollution Incident Response Management Plan](#).

7. Monitoring

PKCT will maintain records of all waste streams which detail:

- Amount (weight or volume as appropriate) disposed
- Amount reused on site
- Amount sent for reprocessing, recycling or recovery
- Amount sent for disposal (landfill or other).

This data will be used to show changes in PKCT waste generation and management over time and identify if minimisation is being achieved. Ongoing monitoring of this data will demonstrate if management techniques or initiatives are successful and inform PKCT Management on the suitability of future waste management activities.

Waste management contractors shall keep records and report on wastes removed including the means of disposal i.e. landfill, recycling etc. These obligations shall be included in contractual arrangements. Records shall be made available to the Environmental Specialist to enable waste trends to be monitored and to provide data for reporting.

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8. Reporting and Review

This Management Plan does not propose a specific report for waste management and this is not required by the conditions of approval to the 2009 Major Project 08_0009 application. Reporting for waste management will be contained within the PKCT AEMR required by the Major Project approval.

PKCT will review this Management Plan and the results of its implementation on an annual basis.

9. Complaints Recording and Reporting

PKCT has a 24 hour, 7 day free call community hotline number (1800 11448) or e mail communitylinks@pkct.com.au. This is advertised on PKCT website (www.pkct.com.au). This provides a mechanism by which complaints and general enquiries regarding environmental or community issues associated with operational activities can be directed

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

If PKCT receive concerns relating to waste via a compliant or by other means, specific review and/or monitoring may be undertaken to quantify the potential issue.

10. Conclusion

This Waste Management Plan formalises PKCT's process for onsite waste control, handling and minimisation. It explains the different waste streams and identifies opportunities for reuse or recycling. Monitoring of waste amounts will be conducted under the direction of this Management Plan to provide a database of information for use in preparing the PKCT Annual Environmental Management Report.

This Management Plan states that PKCT will investigate opportunities for ongoing waste minimisation through discussion with employees involved in activities that generate waste. PKCT Management has a responsibility under this Plan to review these opportunities to ensure the progression of suitable schemes.

This Management Plan will direct actions on the PKCT premises and will be subject to at least one review every year. The implementation of this Plan will ensure PKCT maintains and improves waste minimisation and management at the premises.