



WASTE MANAGEMENT PLAN

MARCH 2021

PORT KEMBLA COAL TERMINAL
HSEC
Waste Management Plan



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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.
8	14 th September 2020	Luke Pascot	Review following Triennial Audit. No waste related recommendations from audit. Minor updates made to doc., not material.
9	12 th February 2021	Luke Pascot	Review and update following DPIE RFI and PKCT site separation for AIE site

Definitions

DPIE refers to the Department of Planning, Industry and the Environment

EPA refers to the Environment Protection Authority

EPL refers to Environment Protection Licence

NSWP refers to NSW Ports

PKCT refers to Port Kembla Coal Terminal

PRP refers to Pollution Reduction Program

WCC refers to Wollongong City Council

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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 (DPIE)'s approval conditions (refer to Section 5.3) for waste reporting.

1.2 Background

Port Kembla Coal Terminal (PKCT) provides a coal product receipt, storage and shipping loading service to its customers. PKCT is located on the northern side of the inner harbour and operates premises leased from NSW Ports (NSWP).

PKCT has been in operation since 1990 and operates under an Environment Protection Licence (EPL) No. 1625 in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act).

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 DPIE. 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.

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2. RESPONSIBILITIES

The roles and responsibilities relevant to the environmental management at PKCT are defined in Table 1 below.

Table 1 Environmental Management Roles and Responsibilities

Role	Responsibility
PKCT employees, contractors and site personnel	<p>All PKCT employees, contractors and other site personnel are responsible to comply with this management plan.</p> <p>PKCT employees, contractors and other site personnel must take appropriate action detailed in this management plan in accordance with PKCT's legal and environmental obligations.</p>
Environmental Specialist	Is responsible to the HSER Superintendent for the coordination and implementation of the management plan to PKCT site operations.
Health Safety Environment and Risk (HSER) Superintendent	Is responsible to the General Manager for site monitoring and operation of environmental control systems.
Operations Manager	Is responsible for managing and supporting the shift and daywork teams to effectively and safely operate the business in line with customer, community and regulator expectations.
Maintenance Superintendent	Is responsible to the General Manager for work execution ensuring environmental control equipment is maintained, reliable and effective.
Asset Manager	Is responsible for asset management and planning, ensuring environmental control equipment is fit for purpose, reliable and effective.
General Manager	Is accountable for PKCT's legal and environmental compliance.

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3. LEGISLATIVE AND OTHER REQUIREMENTS

3.1 Legislative Requirements

3.1.1 Protection of the Environment Operations Act 1997

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 does not have any waste requirements. Scheduled activities referenced on the EPL pertain to Coal Works.

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.

3.1.2 Waste Avoidance and Resource Recovery Act 2001

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. This Act does not specifically apply to PKCT, but some of the objectives of this Act are relevant to this Management Plan and include:

- 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 – Avoid the generation of excess or unwanted waste
 - ii. Resource recovery – Reuse of materials during the operation of the site
 - iii. Disposal - Lawful disposal of waste for to a licenced facility/contractor
- 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.

3.1.3 Contaminated Lands Management Act

The Contaminated Land Management Act 1997 (CLM Act) establishes a process for investigating, managing and remediating contaminated land. Where contamination is known to be present but does not pose an unacceptable risk to the current or approved land use, management of the

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contamination and identification of remediation requirements may be dealt with by the local council under the planning and development framework of the Environmental Protection and Assessment Act 1979 (EP&A Act).

3.1.4 Environmentally Hazardous Chemicals Act 1985

The Environmentally Hazardous Chemicals Act 1985 (NSW) allows the EPA 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 EPA. 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.

3.1.5 Environmentally Hazardous Chemicals Regulation 1999

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.

3.2 Environmental Protection Licence Requirements

PKCT is licenced by the NSW EPA under the POEO Act 1997. This licence is reviewed at least every 5 years after the issue of the EPL. The conditions of the EPL with respect to waste management are addressed in this Management Plan. A copy of the EPL can be accessed via the NSW EPA web site. The EPL requirements relating to waste management handling at the site are summarised in Table 2 below.

Table 2 EPL Conditions – Waste

Condition	Description
L3.1 – Waste	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 Waste	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.
O1.1 – Activities must be carried in a competent manner	Licensed activities must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> a) the processing, handling, movement and storage of materials and substances used to carry out the activity

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Condition	Description
	b) b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

3.3 Department of Planning, Industry and Environment: 2009 Approval Conditions

On the 12th June 2009, the Minister for Planning approved a Project Application (08_0009) which was submitted by PKCT to change receipt arrangements. The project approved by the minister was defined as the development described in the environmental assessment. The project was approved with conditions, including a requirement for PKCT to prepare and implement strategies to monitor and minimise waste.

3.3.1 Condition 19 – Waste

Condition 19 of the major project approval relation to waste management and minimisation is summarised in Table 3 below.

Table 3 Condition of Approval (Condition 19)

Condition Details	Area addressed in WMP
19. The Proponent shall:	Key references herein unless noted otherwise
(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	Section 6, 7 and 8
(d) Report on waste management and minimisation in the AEMR to the satisfaction of the Director-General.	

3.4 Policies and Standards

PKCT is managed by South32 (Illawarra Coal) and has a management system in place which operates in accordance with its Sustainable Development Policy (PO.BM.291), Environment Policy (PO.HS.85) and Quality Policy (PO.BM.901). These policies are summarised in Table 4 below.

Table 4 PKCT Policies and Standards

Policy / Standard	Description
Sustainable Development Policy	The sustainable development policy outlines the objectives PKCT undertake to ensure site operations are undertaken in a sustainable manner which considers the following key concepts:

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Policy / Standard	Description
	<ul style="list-style-type: none"> The health and safety values of PKCT staff, contractors and site personnel Set and achieve sustainable development targets with respect to energy and water efficiency targets which promotes the efficient use of resources and include reducing and preventing pollution throughout the lifecycle of PKCT products Develop partnerships that foster the sustainable development of our local communities, enhance economic benefits from our operations. Ongoing consultation with customers, employees, indigenous land owners and the local community.
Environmental Policy	<p>The environmental policy outlines PKCT commitment to improved environmental performance and ensuring site operations are undertaken in an environmentally responsible manner which includes:</p> <ul style="list-style-type: none"> Understanding and controlling impacts of site operations on the environment and community Maintain the highest possible standards of environmental management and monitoring Compliance with regulatory requirements, conditions of approval and licence conditions Ongoing consultation with customers, employees, indigenous land owners and the local community.
Quality Policy	<p>PKCT Business Management System provides a framework for managing quality and establishing, achieving and reviewing quality objectives in compliance with the requirements of AS/NZS ISO 9001:2016 and ISO 14001:2015. PKCT staff, contractors and site personnel will fulfil the requirements detailed in the AS/NZS ISO 9001:2016 and ISO 14001:2015 and continually seek opportunities to improve system effectiveness</p>

PKCT has an environment management system in place which is certified to ISO 14001:2015. The system includes documented policies and procedures, environmental aspects assessed and registered with processes for their control and continual improvement. The system is subject to audit and review including biannual surveillance visits by PKCT's external certifier (Lloyd's Register Quality Assurance Limited).

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4. SITE OPERATIONS

4.1 Site Interactions with AIE

Australian Industrial Energy (AIE) is working to develop Australia's first liquefied natural gas (LNG) import terminal at PKCT's Berth 101. PKCT has reached a commercial agreement with NSW Ports and AIE to surrender the southern area of its lease for AIE to construct and operate the LNG import terminal. The date of surrender is 31/03/2021. The revised site boundary for PKCT, as shown in Figure 1 has resulted in a change in PKCT's site operations, infrastructure and environmental management strategies.

The changes include:

- Reduced lease area due to the surrender of the Bulk Products Area, Berth 101 and Seawall Road
- The removal of five (5) collection ponds / sumps and two (2) wet weather discharge points from the PKCT Contaminated Water Collection Treatment System (CWCT), which include:
 - Pump 1 – Southern Pond (wet weather discharge point)
 - Pump 8 – T3 Pond (wet weather discharge point)
 - Pump 9 – Conveyor C7 Sump
 - Pump 16 – Berth 101 North Sump
 - Pump 17 – Berth 101 South Sump
- The addition of two (2) collection ponds / sumps and two (2) wet weather discharge points to the CWCT System, which include:
 - Pump 24 – TS8 Sump (wet weather discharge point)
 - Pump 25 – South Eastern Pond (wet weather discharge point)
- Amendment to the Air Quality Monitoring network which includes the relocation of the southernmost continuous dust monitor (nominated as C1)
- Traffic management and site access arrangements from the southern end of the revised PKCT site boundary.

PKCT and AIE will work collaboratively during the operation of the AIE site to ensure environmental obligations are met, site operations for PKCT and AIE can be run effectively and safely and any issues raised are dealt with in a timely manner.

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Figure 1: PKCT Site Layout



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5. MANAGEMENT STRATEGY

5.1 Operational Activities and Potential Issues

Site operations undertaken at the site shall be 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;

- Avoidance – Avoid the generation of excess or unwanted waste
- Resource recovery – Reuse of materials during the operation of the site
- Disposal – Lawful disposal of waste to a licenced facility/contractor

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.

Project related waste may also be generated where waste is disposed of directly or collected in project specific bins or locations on site. Reference is also made to Contractor Minimum Requirements for Working Onsite PO.CM.496 which specifies that 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 DPIE at the end of July each year.

5.2 Waste Streams Identified at PKCT

Waste management at PKCT is undertaken through the identification of waste and designation into categories to allow suitable direction for reuse, recycling or disposal. Table 5 lists the different types of waste generated at the PKCT premises and Sections 5.2.1 to 5.2.9 provides further details for each waste stream. The method of disposal of any disused/left over waste materials shall be determined with reference to appropriate regulatory authority to confirm legal requirements are met and ensure it is managed in an environmentally acceptable manner in accordance with the Site EPL and the legislation as defined in Section 3.

Table 5 Waste streams generated at PKCT

Waste Type	Direction / Flow
Oil and Lubricants	Waste disposal (limited opportunity for reuse)
Trade Waste	Waste disposal
General Rubbish & Scrap Metal	Recycling or landfill
Green Waste	Reuse on site or recycling

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Demolition & Construction	Reuse on site, recycling or landfill
Paper and Cardboard	Reuse on site or recycling
Water	Reuse on site or disposal
Asbestos Waste	Disposal in accordance with legal requirements
Batteries	EPA licensed disposal facility

5.2.1 Oil and Lubricants

PKCT personnel and/or contractors are engaged by PKCT to carry out tasks on site involving handling, 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 or disposed of directly by an EPA licensed waste disposal contractor. The management of waste oils at the site includes:

- Regular review and update of all Safety Data Sheets (SDS) available in ChemAlert
- Waste oil shall be returned to the Workshop and deposited into Intermediate Bulk Containers (IBC).
- 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.
- An 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.
- Waste oil receipts shall be supplied by the contractor collecting waste for disposal and retained in a secure location as determined by the manager responsible.
- Oil contaminated components shall be taken to the Workshop and excess oil allowed to drain into the waste oil container adjacent to the steam cleaning bay.

There is a waste oil storage tank that captures any spillage from the combustible liquids storeroom in the Stores Building. The quantity and type of oils that stored in this location (i.e., combustible liquids – diesel, engine oils) are not designated as a Dangerous Good requiring licensing by WorkSafe NSW. 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 event, expert external advice shall be sought from a EPA licensed waste disposal contractor, consultant or WorkSafe NSW to ensure disposal is carried out in a safe and environmentally acceptable manner.

Empty oil drums shall be stored opposite the steam cleaning bay, on the southern side of the storeroom, against the wall. Oil drums must be stored in such a manner (e.g., lids in place) to avoid any potential contact with rainfall or other sources of water. Once the quantity of stored oil drums

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gets to 10 to 12, the Storeman shall contact an EPA licenced service provider to collect the drums and dispose of them.

5.2.2 Trade Waste

Trade waste shall be managed in accordance with the PKCT Trade Waste Permit 33844. Trade waste water will be collected and disposed of by an EPA licensed contractor. Trade waste certificates shall be obtained and filed by the PKCT Environmental Specialist.

5.2.3 General Rubbish and Scrap Metal

Waste bins and the disposal of general waste and scrap metal is managed by the waste service contractor. The waste service contractor provides bins for general waste and scrap metal waste, these are placed at appropriate locations across the 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.

5.2.4 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.

5.2.5 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 demolition and construction waste material on site where practical. Offsite disposal shall be to a EPA licenced facility.

5.2.6 Paper and Cardboard Waste

PKCT will ensure paper and cardboard waste will be collected for recycling and reuse in accordance with the Waste and Resource Recovery Act. Paper and cardboard waste are primarily generated from office activities and supplies used by PKCT staff for day-to-day operations.

5.2.7 Water

PKCT will ensure potentially polluting activities are not undertaken in areas that discharge to stormwater drains. All wastewater generating activities must occur within designated areas that drain into trade waste systems or through the CWCT system as defined in the water management plan and includes:

- CWCT system discharges by monitoring pH, oil/ grease and suspended solids
- Effective management of sedimentation ponds as defined in the EPL
- Recycled water usage.

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5.2.8 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. Refer to the PKCT Asbestos Management Plan MP.HS.1005 for further details on the management of asbestos waste at PKCT.

5.2.9 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 Stores Building. The Storeman 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 Stores Building for offsite disposal to a recycling facility.

5.3 Unauthorised Waste Disposal

The unlawful disposal of waste on the PKCT site or in PKCT's waste collection facilities from sources external to PKCT poses an environmental, finance and safety risk to PKCT staff and contractors.

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 will be unknown. 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 licensed service provider shall be arranged to assist in its identification and removal.

5.4 Legal Requirements: Waste Tracking

Certain wastes must be tracked in accordance with the POEO Act. 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:

- Waste Oil classed as J120
- Trade Waste.

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 identified requirements.

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The proposed works in this Management Plan would not generate any unacceptable environmental impacts as all waste management activities will be undertaken with appropriate safety precautions, mitigation measures or procedures in place.

Waste related aspects are detailed in PKCT's Environmental Aspects and Impacts Register (RG.HS.2).

5.6 Management Strategy, Effectiveness and Improvement

Management strategies implanted at the site for waste includes:

- 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.
- The effectiveness of waste management processes in reducing waste and increasing reuse and/or recycling will be monitored by PKCT and reported through Annual Environmental Management Reports.

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6. EVENT MANAGEMENT

PKCT has emergency response processes in place in case of a waste contamination or disposal event which may be observed internally through site observations or through an external community or stakeholder complaint. These processes provide for action to be taken to mitigate impacts. Events are investigated to develop corrective actions. Events and actions are managed through PKCT's event management system.

The Emergency Management Plan (MP.HS.79) outlines the emergency activation and response process at the PKCT site. The Emergency Management Plan is supported by the Pollution Incident Response Management Plan 2018 (JI.HS.960) which outlines responses measures to environmental pollution event.

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7. MONITORING

PKCT will maintain records of all waste streams which details:

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

This data will be used to show changes in PKCT waste generation and management over time and determine what measures can be implemented to continually improve waste management and increase resource recovery. 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 service providers will keep records and report on waste streams removed from site and the how it has been treated i.e. landfill, resource recovery etc. These obligations shall be included in contractual arrangements between PKCT and the waste service provider.

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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PKCT has a 24 hour, 7 day free call community hotline number (1800 111448) and email link i.e. communitylinks@pkct.com.au which is advertised on the PKCT website (refer www.pkct.com.au). This provides a mechanism by which complaints and general enquiries regarding the environment or community issues associated with operational activities can be managed.

PKCT has a Community and Stakeholder Complaints Management processs (PR.BM.933) in place which ensures complaints are recorded, registered and investigated. Where appropriate, corrective actions are developed and implemented.

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