

Port Kembla Coal Terminal (PKCT) Approval 08_0009

Department of Planning and Environment (DPE) – Independent External Audit April 2017

On 7th and 10th April 2017, AECOM undertook a Triennial Independent Environmental Audit at Port Kembla Coal Terminal as per the requirements of Project Approval 08_0009. By letter dated 10th May 2017, PKCT requested of the DPE that the Audit Report submission date be extended to the 16th June 2017 due to AECOM's lead auditor resigning from the audit team. This request was approved by the DPE.

As per Schedule 4, Condition 6, of Approval 08_0009 the tables below represent PKCT's formal response to the recommendations outlined in the submitted Audit Report.

The tables below are presented in the same format to those contained in the Audit Report with PKCT's Response to each finding outlined within the last column to the right of the table.

Table 1: Project Approval DA 08_0009

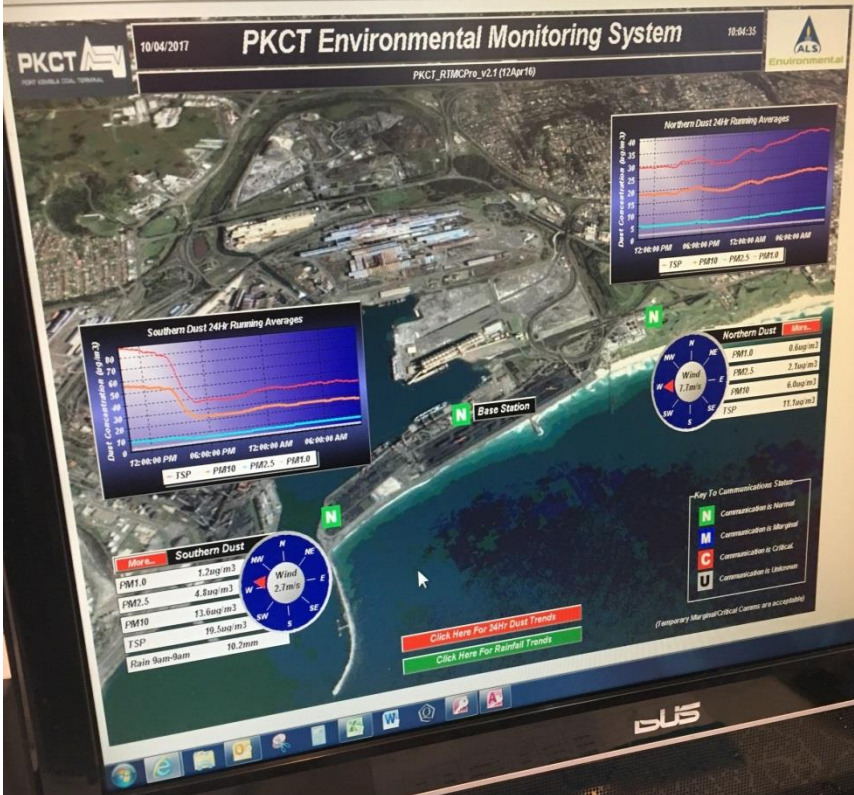
| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| DA 08_0009, S2.C7 | <p>The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been dispatched between the hours of:</p> <p>a) 7 am to 10 pm Monday to Friday; and</p> <p>b) 8 am to 6 pm Saturday and Sunday or Public Holidays unless in accordance with a project approval granted to that Colliery under Part 3A of the EP&A Act.</p> | <p>An Opportunity for Improvement was identified during the 2014 IEA relating to updating the Drivers Code of Conduct (DCC) so that the obligations within the DCC align with the Conditions of Approval in particular to truck dispatch times from the NRE No 1 Colliery at Russell Vale. In response, PKCT reported in its 2015 / 2016 AEMR (p.109) that the DCC was updated in August 2014.</p> <p>A review of the DCC (version 6 dated 30.11.15) confirmed that the Drivers Summary Sheet (within the DCC) outlines the permitted travel times and notes that '<i>despatch of road haulage of coal from Wollongong Coal No.1 mine via Bellambi road is permitted to PKCT between 7am and 10 pm Monday to Friday, and 8am to 6pm on Saturday and Sunday or public holidays.</i>'</p> <p>Toolbox talk records relating to a refresher of the PKCT DCC were sighted dated August 2016 and April 2017.</p> <p>It was reported that the NRE No 1 Colliery has an electronic boom gate which does not open until 7 am.</p> <p>Trucks have electronic monitors that enable tracking of the date, time and speed that the trucks entered and exited the site, the trip distance and the location. An activity report by vehicle is sent to the manager on a monthly basis (sighted example for one vehicle for period 5.05.2016 to 26.05.16). A review of this activity record did not indicate any instances where</p> | <p>Compliant</p> <p>OFI-2017 06: PKCT to introduce a procedure to request/ review and record compliance of movements of trucks along Bellambi Road at regular intervals when coal receipt from the NRE No.1 Colliery recommences.</p> | <p>Finding accepted.</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/08/2017</p> |

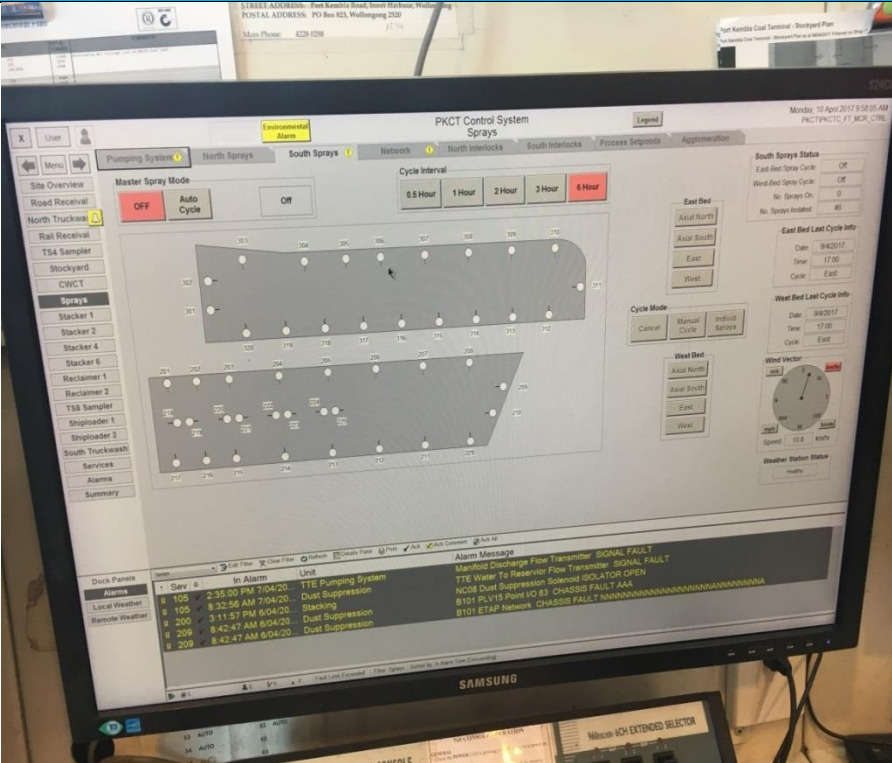
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| | | <p>that vehicle entered or exited the NRE No.1 Colliery outside of the permitted hours.</p> <p>Monthly checks of compliance with the DCC were being undertaken by PKCT using the 'PKCT Task Coach & Observation Sheet: Truck Drivers Code of Conduct'. 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 all of these forms included the check of the time restrictions. Where that section was completed, no issues had been identified.</p> <p>It was reported that there has been no coal received from the NRE No 1 Colliery in the last 12 months.</p> | | |
| DA 08_0009, S2.C13 | <p>Operation of Plant and Equipment</p> <p>The Proponent shall ensure that all plant and equipment used on site is:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p> | <p>The work order and maintenance system was observed during the site inspection. The work order and maintenance system manages how pollution control equipment is managed. Work Orders for the water system were observed to include sump float and pump control inspections as well as the truck wash.</p> <p>It was reported that inspection regimes are based on the equipment manual or design instructions. Maintenance and inspection work was scheduled and work orders issued to shift tradespersons or to the Asset Maintenance Team where work is carried out by contractors.</p> <p>The work order system excludes truck maintenance, though PKCT has interface with truck companies and coal shippers with regard to truck maintenance. Feedback regarding the condition of equipment is recorded in the work order system to track the depletion of equipment and track supply needs. PKCT has an alarmed digital control system which tracks the operation/capacity of equipment.</p> <p>The following non-compliances with the requirement of EPL 1625 relating to the maintenance and operation of plant and equipment were reported in the 2014 / 2015 and 2015 / 2016 Annual Returns:</p> <ul style="list-style-type: none"> 1 April 2014 to 31 March 2015 - A sump pump failed to start automatically that resulted in an overflow to Port Kembla harbour during a storm event. The pump was reported to have been started manually and operated without further problems. PKCT installed a new switch and implemented corrective actions. 1 April 2015 to 31 March 2016 - A transfer pump at Tower 3 Pond failed to operate | <p>Non-compliant</p> <p>Low Risk</p> | <p>Finding accepted.</p> <p>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.</p> <p>PKCT continues to operate in alignment with its approved Policies, Procedures and Management Plans. PKCT continues to maintain</p> |

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| | | <p>resulting in surface water overflow to Port Kembla harbour. A portable pump was installed and the fault was reported to have been addressed. PLC upgrades at time contributed to software problem. PLC system upgraded.</p> <p>A training presentation dated October 2014 was observed. The training included a review of EPL monitoring requirements and the actions required by tower operators and coordinators as well as sampling requirements.</p> <p>A meeting invite dated 28 October 2014 included an agenda item for 'environmental sampling'.</p> <p>An email from the Environmental Specialist to shift managers on 12 November 2014 noted that the Water Sampling Procedure had recently been updated.</p> <p>On the basis of the non-compliances with the equivalent condition of the EPL reported in the 2014 / 2015 and 2015 / 2016 Annual Returns, this condition has been assessed as non-compliant.</p> | | <p>accreditation to ISO14001 and ISO9001.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> |
| DA 08_0009, S3.C2 | <p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <p>a) be developed in consultation with DECC;</p> <p>b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and</p> <p>c) include a:</p> <ul style="list-style-type: none"> - combination of attended and | <p><u>Preparation</u></p> <p>The Noise Management Plan (NMP) was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014) assessed that the requirements of the plan were met and that the plan was prepared in consultation with the relevant agencies.</p> <p>The NMP was last updated on the 16.04.14 (Version 8). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>The previous IEA (AECOM, 2014) recommended that the Noise Management and Monitoring Plan included a discussion on the appropriateness of using the BarnOwl noise monitoring system.</p> <p>The Plan was revised and Section 4 (Noise monitoring) and Appendix B of the NMP now includes a discussion of the suitability and limitations of the BarnOwl noise monitoring system.</p> <p>Since the last revision of the NMP, PKCT has, in consultation with the DP&E, ceased to conduct bi-annual noise monitoring (refer S3.C2 above). It is recommended that the NMP is revised to reflect this change to the noise monitoring protocol.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the NMP.</p> | <p>Preparation: Compliant</p> <p>REC-2017-09 - Revise the NMP with the following improvements:</p> <ul style="list-style-type: none"> • Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken. • Consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of maximum noise levels) in any future | <p>Finding accepted.</p> <p>REC-2017-09 - PKCT will revise the Noise Management Plan to reflect that the by-annual noise monitoring is no longer required.</p> <p>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 maximum noise levels)</p> |

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| | <p>unattended noise monitoring measures;</p> <ul style="list-style-type: none"> – 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. | <p><u>Implementation</u></p> <p>In general, it was considered that the NMP was being implemented. Refer also to S3.C3 below.</p> | <p>noise compliance surveys</p> <p>Implementation: Compliant</p> | <p>in any future noise compliance surveys.</p> <p>PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |
| <p>DA 08_0009, S3.C3</p> | <p>Continuous Improvement</p> <p>The Proponent shall:</p> <ol style="list-style-type: none"> 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. | <p>Noise mitigation measures outlined in the NMP include:</p> <ul style="list-style-type: none"> • Rail receipt enclosed within a shed. • Road and Rail Receipt conveyors initially underground then enclosed within conveyor galleries and transfer stations. • Truck driver rules and the Drivers Code of Code covering requirements relating to driver practices, in particular compression braking and speed control. • Job planning and risk assessment processes are in place which gives consideration to health, safety, environmental and community impacts ensuring aspects such as noise are identified, considered and suitable controls are put in place. <p>The rail receipt shed and enclosed conveyors were observed during the site inspection.</p> <p>The Drivers Code of Conduct Implementation Plan and Drivers Code of Conduct Monthly Reports for the audit period were reviewed. The Monthly Reports include a 'Checklist of Key Operational Focus Areas' which include the focus area of Noise Minimisation Controls.</p> <p>One noise enquiry was received by PKCT from a nearby resident during the audit period. The enquiry related to trucks use of compression braking in the middle of the night. In response, PKCT requested its acoustic consultants to undertake additional monitoring (as part of the half yearly monitoring undertaken in April 2016) to assess the noise impact of trucks entering</p> | <p>Compliant</p> <p>OFI-2017-07 – Consider investigating ways to control and/or manage potential noise from the metal tubes installed at the truck wash area alerting drivers to lower their trailers.</p> | <p>Finding accepted</p> <p>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.</p> <p>PKCT will investigate the hanging metal tubes at the Northern Truckwash to assess whether noise levels associated with them may be problematic.</p> |

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| | | <p>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 ($L_{A1,1 \text{ min}}$). The assessment concluded that although audible at times, the events measured were below the sleep disturbance screening criterion and that it is unlikely that events from PKCT would cause awakening reactions. PKCT requested the transport companies re-communicate the requirements and undertake driver monitoring to ensure compression braking at the Springhill Rd/ Port Kembla Rd intersection is not occurring. The enquiry was followed up with the resident to their satisfaction.</p> <p>No other enquiries or complaints relating to noise were recorded during the audit period.</p> <p>Site visit (10 April 2017) identified potential noise nuisance associated with dangling chain/metal tubes at the truck wash area to alert truck drivers to lower their trailers (refer to photo in main report). The wind was causing the metal tubes to hit each other which may create a noise issue, particularly at night-time, at nearby residential receivers. PKCT could investigate ways to control and/or manage this issue (e.g. chains/metal tubes to be spaced further apart).</p> <p>The AEMRs were noted to include a discussion of the activities undertaken during the reporting period related to noise as well as the planned activities for the upcoming reporting period. The 2015 / 2016 AEMR reported that <i>“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”</i></p> | | <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/12/2017</p> |
| DA 08_0009, S3.C8 | <p>Operations</p> <p>The Proponent shall:</p> <p>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;</p> <p>b) ensure that the real-time air</p> | <p>The operation of the PKCT terminal is managed with the input of a range of meteorological data from on-site and off-site meteorological stations. The monitoring is undertaken as follows:</p> <ul style="list-style-type: none"> • Prior to each morning shift, the daily forecast is checked from the Bureau of meteorology to identify whether there are any strong winds forecast and in particular wind from the south. When necessary this allows the planning of the day’s activities and preparation of the water gun programs. • Meteorology from the on-site meteorological station is displayed in the control room via an alert screen (see below) | <p>Compliant</p> <p>OFI-2017-08 - Consider modifying the display to align the north on the maps with north on the displays.</p> | <p>Finding accepted.</p> <p>OFI-2017-08 - PKCT will work with its IT consultant to investigate and if possible modify the existing screen display interface to align the north on the maps with north on the displays.</p> <p>Action by: PKCT</p> |

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| | <p>quality monitoring and meteorological monitoring data is assessed regularly; and</p> <p>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.</p> |  <p>A minor recommendation for the display is to align the north on the maps with north on the displays. The display shown could be misinterpreted as the North arrow is facing west across the site.</p> <p>A range of triggers have been set in place to control the water guns that are linked to the meteorological monitoring. The control screen (showing part of the stockyard area and recent records of activations) is shown below.</p> | | <p>Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |

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| | |  <p>Real time monitoring data is displayed in a number of locations throughout the site and was examined daily to ensure results have a comment accompanying the monitoring data describing the day. The data was compiled in the central dust monitoring database outlined under DA 08_0009, S3.C7. This includes information on the spray cycles used daily and any conditions that may influence the measurement of dust on the site.</p> <p>PKCT uses EMS to record environmental observations such as visible dust events. A review of an extract from the EMS for the audit period confirmed that instances of observed dust emissions were identified, investigated and recorded.</p> | | |

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| DA 08_0009, S3.C12 | <p>SURFACE WATER Discharge Limits</p> <p>Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p> | <p>A number of non-compliances with the EPL were reported during the audit period and therefore this condition has been assessed as non-compliant.</p> <p>Refer to assessment of compliance with L1.1 and L2.1 of the EPL.</p> | <p>Non-Compliant Medium Risk</p> | <p>Finding accepted.</p> <p>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.</p> <p>Specifically in response to early non-compliances with water quality at the Terminal, PKCT has implemented the following during the audit period;</p> <ul style="list-style-type: none"> • 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 |

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| | | | | <p>assist with water clarification of highly turbid water if/when it occurs on site.</p> <ul style="list-style-type: none"> Installation of a belt washing station on Berth 102 Conveyor 14 which has significantly reduced coal spillage on the Berth <p>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).</p> <p>PKCT considers that these improvements have been effective at improving compliance with Condition S3.C12.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with</p> |

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| | | | | this non-compliance. |
| DA 08_0009, S3.C13 | <p>Water Management Plan</p> <p>The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director- General. This Plan must:</p> <p>a) be prepared in consultation with DECC;</p> <p>b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and</p> <p>c) include:</p> <ul style="list-style-type: none"> – 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 | <p><u>Preparation</u></p> <p>The Water Management Plan (WMP) was approved by the Director-General on 5 April 2012. The previous IEA (AECOM, 2014) assessed that the requirements of the plan were met and that the plan was prepared in consultation with the relevant agencies.</p> <p>The WMP was last updated with in November 2016 (Version 8). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>Since the last review of the WMP there have been a number of upgrades to the water management system on site. Most notably the upgrade to the Central Pond as required by Pollution Reduction Program 12 (since removed from the EPL as it was assessed as completed by the EPA). The Central Pond Upgrade Project included improvements to the pond layout, capacity, pumps and inflow management. The current WMP does not reflect these upgrades.</p> <p>The WMP includes a site water balance as Attachment A. The water balance model calibration was conducted for the period 1 April 2009 to 10 February 2010. Given recent upgrades to the Central Pond, including sealing of a previously unsealed area, and the age of the site water balance model calibration AECOM consider that the site water balance should be reviewed and to confirm input and output parameters are still relevant.</p> <p>Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the WMP.</p> <p><u>Implementation</u></p> <p>A thorough assessment of the implementation of all aspects of the WMP was not undertaken as part of this audit, however in general it was considered that the WMP was being implemented:</p> <ul style="list-style-type: none"> • Water quality monitoring was being undertaken (refer assessment EPL L2.1 and M2.3) • Collection ponds were being maintained (refer O4.2) • The water collection system was computer controlled by the Main Control Room • Incidents were being recorded in PKCT’s Event Management System (EMS) <p>The WMP states erosion and sediment control plans will be prepared where surface works are</p> | <p>Preparation: Compliant</p> <p>REC-2017-13 – Review the WMP to reflect recent upgrades to water management on site, in particular the Central Pond Upgrade Project. This review should include a review and revision (where necessary) of the site water balance and be submitted to the Director General for approval.</p> <p>REC-2017-14 Update the WMP with the following improvements:</p> <ul style="list-style-type: none"> • Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and | <p>Findings accepted.</p> <p>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. PKCT will submit the revised Plan to the Director General for approval within three months of submission of the audit report.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> <p>REC-2017-14 - PKCT will revise the Water Management Plan to</p> <ul style="list-style-type: none"> • Include references to all surface water licenced discharge points |

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| | <p>Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004, or its latest version);</p> <ul style="list-style-type: none"> - a surface water monitoring program that includes: <ul style="list-style-type: none"> i. stormwater effluent discharge criteria; ii. a monitoring protocol for evaluating Compliant with the stormwater effluent discharge criteria; and iii. reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met. | <p>proposed with potential for sediment contaminated run-off to leave PKCT's premises. The auditors sighted an example of an Environmental Management Plan prepared by the contractors contracted to undertake a restoration and compliance project involving berm extensions, SPMT roads and ST7 Construction Area works. The Plan outlined the environmental management measures to be implemented during the construction works associated with the project and included a section on soil and water management. The Appendix included an Environmental Control Plan which marked up the locations of silt fences, sand bags, stockpiles, stormwater pits and the sediment basin.</p> <p>It is noted a few non-compliances with discharge criteria have been recorded (refer L1.1 and L2.1 of the EPL) however these were predominately related to incidents or storm events. There have been no exceedances of concentration limits since mid-2015. On the basis that systems were in place to manage surface water and monitor its effectiveness, this condition has been assessed as compliant.</p> | <p>reporting requirements.</p> <ul style="list-style-type: none"> • Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625. • Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16. <p>Implementation: Compliant</p> | <p>specified in EPL 1625 including monitoring and reporting requirements.</p> <ul style="list-style-type: none"> • Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625. • Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16. <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |

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| DA 08_0009, S3.C18 | <p>Greenhouse and Energy Efficiency Plan</p> <p>Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:</p> <p>a) be prepared generally in accordance with the Guidelines for Energy Savings Action Plans (DEUS 2005, or its latest version);</p> <p>b) be submitted to the Director-General for approval;</p> <p>c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;</p> <p>d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;</p> <p>e) describe how the performance of these measures would be</p> | <p><u>Preparation</u></p> <p>The previous IEA (AECOM, 2014) assessed that the requirements of the GHG&EE Management Plan were met. The Plan was last updated with minor amendments in December 2016 (Version 9). Given these amendments were minor it was not re-submitted to the Director-General for approval.</p> <p>The previous IEA (AECOM, 2014, p.a-6) recommended that the GHG&EE Management Plan should be reviewed and updated “at least annually so that the document reflects the current state of operation on site. In particular, the Plan needs to include reference to the most recent relevant legislation, NGERs data and a summary of information gathered through the Energy Savings Action Plans”.</p> <p>This recommendation was implemented and the plan was being reviewed annually. Refer also to Section 9 of the main report for findings relating to the review of the adequacy of the GHG&EE Management Plan.</p> <p>It is noted that the NSW Department of Energy, Utilities Sustainability (DEUS) no longer exists and energy efficiency is managed by OEH. Additionally the Energy Savings Action Plan program is no longer enforced. OEH has developed new programs to assist businesses in NSW to achieve greater resource efficiency and more environmentally sustainable work practices.</p> <p><u>Implementation</u></p> <p>As stated in the Plan, PKCT has very low level of Scope 1 GHG emissions. The majority of its emissions are Scope 2 GHG emissions as a result of electricity use (97.4% of emissions). The plan identifies some measures to minimise Scope 1 emissions e.g. reduce diesel and petrol use of PKCT vehicles, ensure efficient use of oils and gases during maintenance, ensure efficient use of acetylene etc. These were generally being implemented. It was reported that the conveyors were the main contributor to electricity consumption. It was also reported that during the planning phase, the Projects Team undertake a review of the efficiency of new plant and machinery.</p> | <p>Preparation: Compliant</p> <p>REC-2017-15 – Revise the GHG&EE Management Plan to reflect that the Energy Savings Action Plan Program has ended and identify a new framework for identifying and implementing measures to reduce greenhouse gas emissions and energy use.</p> <p>REC-2017-16- Revise the GHG&EE Management Plan with the following improvements:</p> <ul style="list-style-type: none"> • Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered. | <p>Finding accepted.</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |

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| | <p>monitored over time; and</p> <p>f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR to the satisfaction of the Director-General.</p> | <p>PKCT receives detailed monthly electricity bills identifying usage which is transferred into a spreadsheet by the Environmental Specialist and used for analysing trends and AEMR reporting.</p> <p>AEMRs include greenhouse gas and energy efficiency information and include trends concerning reportable energy.</p> <p>The 2013/2014 AEMR (p.46) notes that <i>"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"</i>.</p> <p>The 2014/2015 AEMR (p.48) notes that <i>"Reportable energy consumption and greenhouse gas emissions have slightly increased at PKCT this reporting period"</i>.</p> <p>The 2015/2016 AEMR (p.46) states that <i>"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"</i>.</p> <p>Under the Energy Savings Action Plan Program, PKCT were required to submit annual reports. PKCT sought confirmation from OEH on whether it was still required to submit these. OEH responded that the Energy Savings Action Plan Program has ended and that PKCT has met the requirements of the program and is no longer required to report (email dated 08.08.14).</p> <p>In general it was considered that the GHG&EE was being implemented. A thorough assessment of the implementation of all aspects of the management plan was not undertaken as part of this audit.</p> | <ul style="list-style-type: none"> Update the GHG&EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used. Include further details within the GHG&EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured. <p>Implementation: Compliant</p> | <p>REC-2017-16- PKCT will revise the Greenhouse Gas and Energy Efficiency Management Plan to reflect the recommendations of REC-2017-16.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |
| DA 08_0009, S3.C20 | <p>HAZARDS</p> <p>Dangerous Goods</p> <p>The Proponent shall ensure that storage, handling and transport of dangerous goods are done in accordance with the relevant</p> | <p>The AEMRs state that PKCT is aware of all dangerous goods onsite and ensures personnel are suitably trained to handle these and that there is suitable site storage in accordance with AS1940 & AS1596.</p> <p>PKCT has an Acknowledgement of Notification of Hazardous Chemicals on Premise from SafeWork NSW dated 29.08.16 due to the quantities of compressed gas exceeding the manifest quantity.</p> | <p>Compliant</p> <p>OFI-2017-09 – Investigate the option of providing secondary containment for the flocculent Coreshell 71303 tank to offer additional</p> | <p>Finding accepted</p> <p>OFI-2017-09 - PKCT will investigate options for providing secondary containment for the flocculent Coreshell 71303 tank to offer</p> |

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| | <p>Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.</p> | <p>During the site inspection an approximately 6,000 L tank of the flocculent Coreshell 71303 was observed to be stored in a non-bunded area near the Settling Lagoon. As this product is not a dangerous good it is not covered by AS1940 and AS1596 and the Dangerous Goods Code. A review of the SDS indicates that the product has been characterised as having 'high' potential environmental hazard due to its ecotoxicological effects. The SDS states that the product should be stored in a suitably labelled container which is tightly closed and stored separately from oxidisers. The product was observed to be stored in accordance with the SDS requirements, however given the high environmental hazard PKCT could investigate the option of providing secondary containment for the tank to offer additional protection from accidental release to the harbour.</p> <p>The 2015 / 2016 AEMR reported the following with regards to hazards monitoring:</p> <ul style="list-style-type: none"> • PKCT now has a dedicated, bunded storage area for used oily consumables to be placed prior to removal from site by a licence contractor. This was sighted during the site inspection. • Regular environmental auditing is undertaken in the Main Store and Workshop areas to ensure compliance with relevant standards. The auditors sighted examples of Environmental Task Observation: Workshop and Store Areas dated 5.08.14; 26.02.15; 13.08.15; 23.03.16 and 17.11.16 as well as a screen shot of the EMS showing the list of 'Critical Task Observations' related to the Workshop and Store Area, the date, current stage (close, investigated) and assigned user. A review of this list confirmed observations were carried out regularly (usually at least monthly) during the audit period. • During the 2015/2016 reporting period, PKCT engaged a consultant to identify and assess PKCT's current dangerous goods storage and handling processes for operational effectiveness and compliance to current legislation. The audit identified some improvement opportunities around storage/bunding of empty oil drums and a flocculent container. The auditors reviewed the report provided by Priority Group dated 09.02.16. It is noted this review was undertaken by a consultant associated with STOREMASTA, a dangerous goods / industrial storage sales company. In response, PKCT added the polymer storage tank at the Settlement Lagoon to its Aspects and Impacts register for ongoing tracking. • PKCT continues to utilise a mobile refuelling system for its plant machinery and does not store any fuel on site. The auditors confirmed this was still the case. | <p>protection from accidental release to the harbour</p> | <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date:</p> <ol style="list-style-type: none"> 1. Completion of review of secondary containment options 31/12/2017. 2. Feasible option to be implemented during FY19 financial year. |

| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| DA 08_0009, S4.C1 | <p>ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING</p> <p>Environmental Management</p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:</p> <p>a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General;</p> <p>b) provide for the strategic context for the environmental management of the project;</p> <p>c) identify the statutory requirements that apply to the project;</p> <p>d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> – keep the local community and relevant agencies informed about the operation and environmental performance of the project; – receive, handle, respond to, and | <p><u>Preparation</u></p> <p>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.</p> <p>The Strategy has since been revised (Version 9, 15.10.15). The revised Strategy was not submitted for Director-General re-approval as the changes were considered by PKCT to be immaterial.</p> <p>Refer to Section 9 of the main report for an assessment of the adequacy of the Strategy.</p> <p><u>Implementation</u></p> <p>PKCT's Environment Management System has been certified to AS/NZS ISO 14001:2004 Environmental Management Systems standard. In maintaining its certification, the site undergoes surveillance audits on a six monthly basis. The auditors reviewed the most recent ISO 14001:2004 Surveillance Audit undertaken by Lloyd's Register LRQA on the 19 & 20 October 2016.</p> <p>PKCT also implements an internal audit program. The auditors sighted the Internal Audit Program for 2016-2018 which includes a schedule of ISO certification, Asset Management, Operations, DP&E Independent Audit, Planning and New projects, ISO V BMS Check, Business Services, Engineering and Environmental Management audits.</p> <p>The auditors sighted examples of Environmental Task Observation: Workshop and Store Areas dated 5.08.14; 26.02.15; 13.08.15; 23.03.16 and 17.11.16. These observations reviewed the standard of housekeeping in the workshop and store areas and included checks of the drains on roadways, storage of hydrocarbons and chemicals, oil leaks, general waste bins, uncontained spills and spill kits. The auditors also sighted a Task Observation Sheet: Environment for the Berth Areas, Ship – Dust, Dirty Water Discharge & Spillage Control completed on the 23.01.17 and one for the Main Control Room completed on the 16.02.17.</p> <p>PKCT maintain an Aspects and Impacts Register (as an Excel workbook). The register includes a number of spreadsheets including FY17 Environmental Improvement Plan (EIP) and FY17 EIP Actions.</p> <p>Complaints were being managed as outlined in the Strategy (refer EPL M5.1) for further discussion of complaint management process).</p> <p>PKCT has developed an Incident Investigation and Reporting procedure (PR.HS.124). Incidents</p> | <p>Preparation: Compliant</p> <p>REC-2017-12 - Revise the Environmental Management Strategy with the following improvements:</p> <ul style="list-style-type: none"> • Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation. • Update Table 9-1 to reflect changes to noise monitoring and to include requirements relating to monitoring of sediment levels in ponds and train wagon condition monitoring • Update Table 9-2 to reflect recent changes to reporting requirements e.g. remove requirements to report against | <p>Findings accepted</p> <p>REC-2017-12 – PKCT will revise the Environmental Management Strategy to include the recommendations listed under REC-2017-12.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 16/09/2017</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| | <p>record complaints;</p> <ul style="list-style-type: none"> – resolve any disputes that may arise during the course of the project; – respond to any non-Compliant; – manage cumulative impacts; and – respond to emergencies; <p>e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval;</p> <p>f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and</p> <p>g) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.</p> | <p>were being reported, investigated and closed out using PKCT’s EMS. The auditors reviewed an extract of EMS for the audit period for all the events categorised as ‘Environmental’. It was considered that the EMS was well utilised with over 100 events logged for the audit period ranging from small oil leaks, dust plumes, coal spillages and water discharges. The EMS includes a field for ‘Notification Type’ which has the following options:</p> <ul style="list-style-type: none"> • Minor – PKCT internal, routine via EMS • Minor - PKCT internal, manager contacted • Not material – EPA notification may be required • Material – EPA notification required <p>There are also categories for ‘Risk Ranking Potential Consequence’ (low, moderate, high) and ‘Potential Consequence Severity (Level 1, 2, 3 and 4).</p> <p>Whilst the Notification Type includes a trigger for potential EPA notification, other than if it has been noted within the event summary there is no way of determining which events have actually been notified to the EPA.</p> <p>Environmental monitoring of dust, water discharges, water usage, electricity, greenhouse gas, waste, noise, activity, rainfall, pollutants, green and golden bell frogs, complaints, incidents and cooling tower was being implemented as outlined in the Strategy (refer to specific conditions within this Appendix).</p> <p>Reporting was being implemented as outlined in the Strategy (AEMRs, EPL Annual Returns, EPL monthly reports, National Pollution Inventory).</p> <p>The Strategy was being reviewed on an annual basis as specified within the Strategy.</p> <p>In general it was considered that the Strategy was being implemented. A thorough assessment of the implementation of all aspects of the Strategy was not undertaken as part of this audit.</p> | <p>Energy and Water Savings Plans, and to provide Interim Environmental Management Reports (no longer required), include requirements for Ambient Air Monitoring Report, Wet Weather Overflow Reporting and Train Condition Exception Reporting required by the EPL.</p> <p>Implementation: Compliant</p> <p>OFI-2017-01: Include a field in EMS for recording whether events have been notified to the EPA and other relevant agencies</p> | <p>OFI-2017-01: PKCT will investigate options to update the EMS system interface to include a field for events that have been notified to the EPA.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/10/2017</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| DA 08_0009, S4.C2 | <p>REPORTING</p> <p>Incident Reporting</p> <p>Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.</p> | <p>PKCT reported four incidents to the EPA Environment Line during the audit period relating to discharges of washdown water containing coal fines into Port Kembla harbour. The incidents were not considered to have caused material harm by PKCT. In response, the EPA issued two Formal Warnings and noted that whilst the incidents did not cause measureable environmental harm they had the potential to cause measureable environmental harm to the waters of Port Kembla.</p> <p>These incidents were not reported to the DP&E and other relevant agencies (other than the EPA) within 24 hours. The only reporting of these incidents to the DP&E was through the AEMR.</p> | <p>Non-compliant</p> <p>Low risk</p> <p>REC-2017-01: Ensure that incidents that cause or have the potential to cause material harm to the environment are also reported to the DP&E and other relevant agencies (in addition to the EPA) within 24 hours.</p> | <p>Finding accepted</p> <p>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.</p> <p>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 personnel reminding them of this requirement.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: email to be sent by 30/06/2017.</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| DA 08_0009, S4.C4 | <p>Annual Reporting</p> <p>Within 12 months of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-General and all relevant agencies. This report must:</p> <p>(a) identify the standards and performance measures that apply to project;</p> <p>(b) describe the works carried out in the last 12 months;</p> <p>(c) describe the works planned to be carried out in the next 12 months;</p> <p>(d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;</p> <p>(e) include a summary of the monitoring results for the project during the past year;</p> <p>(f) include an analysis of these monitoring results against the relevant:</p> <ul style="list-style-type: none"> - impact assessment criteria/limits; - monitoring results from previous years; and - predictions in the EA or other documents listed in condition 2 of | <p>Annual Environmental Management Reports (AEMRs) and Interim AEMRs were available for the periods 2013 / 2014, 2014 / 2015, 2015 / 2016.</p> <p>A letter from the DP&E dated 25 March 2014 noted that the Department had reviewed the 2013/2014 AEMR and was generally satisfied with the report noting that future AEMRs should include:</p> <ul style="list-style-type: none"> • Comparison of the monitoring results for noise and air quality with the results from the previous years; and • Identify any trends in noise, air quality and waste monitoring. <p>A letter from the DP&E dated 12.08.14 stated that the 2014 / 2015 AEMR generally satisfies Condition 4 of the approval and specifically noted that the report includes a comparison of the monitoring results for noise and air quality with the results from the previous years; and identification of any trends in noise, air quality and waste monitoring.</p> <p>A letter from the DP&E dated 23.08.16 noted that the 2015 / 2016 AEMR generally satisfies Condition 4 of the approval however has not been prepared in consideration of the Department's guideline for the <i>Post-approval requirements for State significant mining developments – Annual Review Guideline (2015)</i>.</p> <p>The letter requested that the next AEMR be updated to include:</p> <ul style="list-style-type: none"> • A map showing the regional context • A summary of any community engagement activities and community contributions undertaken during the reporting period • Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis. | <p>Compliant</p> <p>OFI-2017-10 - Ensure that future AEMRs include:</p> <ul style="list-style-type: none"> • A map showing the regional context • A summary of any community engagement activities and community contributions undertaken during the reporting period • Detail (i.e. subject, timing or location) of complaints over the previous reporting periods for the purposes of trend analysis. | <p>Finding accepted</p> <p>OFI-2017-10 - PKCT has received correspondence from the DPE requesting updates to the next AEMR.</p> <p>PKCT's next AEMR is due by 31st July 2017. PKCT will update the AEMR format to incorporate the recommendations made by the DPE.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/07/2017</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliant Status & Recommendation | PKCT Response/Action |
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| | <p style="text-align: center;">schedule 2;</p> <p>(g) identify and discuss all exceedences of approval and licence conditions and other applicable standards and performance measures;</p> <p>(h) identify any trends in the monitoring results over the life of the project;</p> <p>(i) identify any non-Compliant during the previous year; and</p> <p>(j) describe what actions were, or are being, taken to ensure Compliant.</p> | | | |
| DA 08_0009, S4.C7 | <p>Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director- General.</p> | <p>As recommended in the 2014 IEA, PKCT commenced undertaking annual reviews of its management plans. The annual reviews have reportedly not resulted in any material changes and as such the plans were not re-submitted to the DP&E for approval.</p> <p>The auditors did not assess whether the changes made to the plans as a result of the 2014 IEA were significant enough to warrant re-submission of the plans to the DP&E for approval.</p> <p>A review of the adequacy of the current management plans is provided in Section 9.0 of the main report. It is recommended that where plans are revised as a result of the IEA adequacy review they are submitted to the DP&E for approval.</p> | <p>Not verified</p> <p>REC-2017-07 – Where a review of the management plans results in significant changes, for example as a result of the adequacy review undertaken every three years as part of the IEA, the plans should be re-submitted to the DP&E for approval.</p> | <p>Finding accepted</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: As necessary if significant</p> |

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| | | | | changes are made during review of any Management Plans. |
| DA 08_0009, S4.C8 | <p>ACCESS TO INFORMATION</p> <p>Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:</p> <p>(a) provide a copy of the relevant document/s to the relevant agencies;</p> <p>(b) place a copy of the document/s on its website; and</p> <p>(c) remove superseded copies of strategies/plans/programs from its website.</p> | <p>a) Previous IEA's assessed that the originally approved management plans were provided to the relevant agencies. Management Plans were being reviewed annually (as per previous IEA recommendation) however as the changes were not considered significant by PKCT they were not re-submitted for approval and the revised plans were not provided to the relevant agencies.</p> <p>PKCT received email confirmation from the DP&E that relevant agencies include the EPA and Wollongong Council.</p> <p>The 2013 / 2014 AEMR was provided to the DP&E by email dated 30.07.14 and the EPA, Wollongong City Council and NSW Department of Trade and Investment by emails dated 15.08.14.</p> <p>The 2014 / 2015 AEMR was provided to the DP&E by email dated 28.07.15</p> <p>The 2015 / 2016 AEMR was provided to the DP&E on the 28.07.16</p> <p>The 2014/2015 and 2015/2016 AEMRs were provided to the EPA and Wollongong City Council by emails dated 15.03.17.</p> <p>The 2014 IEA was provided to the DPE by email dated 9.05.14. Evidence that it was provided to the other relevant agencies was not available.</p> <p>b) PKCT's website has a dedicated 'Environment and Community' page. This page contains links to the Environment Policy, Pollution Incident Response Management Plan and EPL. The Environmental Strategy and other environmental management plans were available on the website however where not easy to locate as they were listed under the 'News' page under the year 2010 (the year they were originally approved).</p> <p>The 'News' page also contained links to the EPL Monthly Reports and the AEMRs (2015 / 2016, 2014 / 2015 and 2013 / 2014). The 2011 IEA was available on the website (under 'News' '2011') however the 2014 IEA was not.</p> <p>The website was not considered easy to navigate and it was difficult to locate the relevant documents. A member of the public wanting to access the management plans and IEAs would need to know the year that the plans were approved and the year the IEAs were conducted.</p> | <p>Non-compliant</p> <p>Low Risk</p> <p>REC-2017-02 - Ensure the website includes the most recent revisions of the Environmental Management Strategy and management plans.</p> <p>REC-2017-03 - Ensure the IEAs are published on the website</p> | <p>Findings accepted.</p> <p>REC-2017-02 - PKCT will review all Management Plans and Strategies available on PKCT's website to ensure that they are the most recent versions of documents.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/06/2017</p> <p>REC-2017-03 - PKCT will update the website to include the completed IEAs.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/06/2017</p> |

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| | | <p>The website would be greatly improved by a more intuitive website layout where all of the environmental information is located under the Community and Environment page with appropriate sub-headings for monitoring reports, AEMRs, independent audits etc.</p> <p>On the basis that not all of the required information was provided to all the relevant agencies and available on the PKCT website, this condition has been assessed as non-compliant.</p> | <p>OFI-2017-04 –Consider changing the layout of the website to make it easier to navigate to the environmental management plans, monitoring reports, AEMRs and IEAs.</p> | <p>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 public.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: Review and upgrade completed by 31/12/2017</p> |

Table 2: Environmental Protection Licence 1625

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action | | | | | | | | | | | | | | | | | | | | | | | | |
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| EPL 1625, L1.1 | <p>LIMIT CONDITIONS</p> <p>Pollution of Waters</p> <p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p> | <p>LDP 16 is the principle discharge point for the Site; however, there are a further five ‘wet weather discharge points’ on-site (refer to Condition P1.3, LDP 22, LDP 23, LDP 24, LDP 25 and LDP 26) and one pond (Northern Pond) that is not included in EPL 1625.</p> <p>LDP 16 (Settlement Lagoon) discharges into Garungaty Waterway that flows into Port Kembla Inner Harbour. Stormwater runoff from various sub-catchments drains into the six ponds located around the Site. In the event the six ponds overtop water is discharged into Port Kembla Harbour; however, dirty water stored in the ponds can be pumped, either via the Central Pond, or directly to the Settlement Lagoon (LDP 16). In addition to providing storage during storm events, settling of suspended sediments occurs in the satellite ponds prior to pumping to the Settlement Lagoon or the Central Pond. Water from the satellite ponds is transferred to the Settlement Lagoon where a flocculent is added to enhance settling of suspended solids. When the Settlement Lagoon is full, water discharges to Garungaty Waterway over an overflow weir. Water is also available for reuse on-site for road dust suppression. The following surface water management infrastructure is located on-site:</p> <table border="1"> <thead> <tr> <th></th> <th>Component</th> <th>LDP No.</th> <th>Catchment Area (ha)</th> <th>Volume (m³)</th> <th>Discharge to</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Settlement Lagoon</td> <td>LDP 16</td> <td>NA</td> <td>7,300</td> <td>Garungaty Waterway</td> </tr> <tr> <td>2</td> <td>TS1 Pond</td> <td>LDP 22</td> <td>4.3</td> <td>1,550</td> <td>Settlement Lagoon</td> </tr> <tr> <td>3</td> <td>Central Pond</td> <td>LDP 23</td> <td>17.7</td> <td>7,480</td> <td>Settlement Lagoon</td> </tr> </tbody> </table> | | Component | LDP No. | Catchment Area (ha) | Volume (m ³) | Discharge to | 1 | Settlement Lagoon | LDP 16 | NA | 7,300 | Garungaty Waterway | 2 | TS1 Pond | LDP 22 | 4.3 | 1,550 | Settlement Lagoon | 3 | Central Pond | LDP 23 | 17.7 | 7,480 | Settlement Lagoon | <p>Non-compliant</p> <p>Medium Risk</p> | <p>Finding accepted.</p> <p>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.</p> <p>Specifically in response to early non-compliances with water quality at the Terminal, PKCT has implemented the following during the audit period;</p> <ul style="list-style-type: none"> • Completion of a \$3.04 million upgrade to the Central Pond • Testing and installation of a coagulant dosing facility at the Central Pond to assist with water |
| | Component | LDP No. | Catchment Area (ha) | Volume (m ³) | Discharge to | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Settlement Lagoon | LDP 16 | NA | 7,300 | Garungaty Waterway | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | TS1 Pond | LDP 22 | 4.3 | 1,550 | Settlement Lagoon | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Central Pond | LDP 23 | 17.7 | 7,480 | Settlement Lagoon | | | | | | | | | | | | | | | | | | | | | | | |

| Condition | Condition Requirement | Comment / Finding | | | | | | Compliance Status & Recommendation | PKCT Response/Action |
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| | | 4 | Tower Pond | 3 | LDP 24 | 2.90 | 450 | Central Pond | <p>clarification of highly turbid water if/when it occurs on site.</p> <ul style="list-style-type: none"> 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 <p>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.</p> <p>PKCT considers that these improvements have been effective at improving compliance with Condition EPL L1.1.</p> |
| 5 | Southern Pond | | LDP 25 | 10.6 | 7,700 | Central Pond | | | |
| 6 | Workshop Pond | | LDP 26 | 1.65 | 370 | Settlement Lagoon | | | |
| 7 | Northern Pond | | - | 13.2 | 3,000 | Settlement Lagoon | | | |
| <p>PKCT reported the following pollution incidents to the EPA during the audit period.</p> <ul style="list-style-type: none"> 25-27 March & 4-6 April 2014: Turbid water discharges following a severe storm event. 5 June 2014: Pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm event. 18 March 2015. During routine cleaning of Shiploader 1 over Coal Berth 102, a blocked launder pipe caused a backup of washwater to fall onto the maintenance bay below and then spill from the Shiploader into Port Kembla harbour. On 28 July 2015 a volume of wash-down water containing coal fines flowed into Port Kembla Harbour. PKCT did not consider the incident to cause 'material harm' but was reported to the EPA Environment Line on the same day (Event Number: C10033-2015). PKCT developed an Action Plan and provided this to the EPA in an email on 28 July 2015. On 4 August 2015 PKCT received an email from the EPA indicating the EPA would be taking no further action concerning the incident. On 28 August 2015 water from Shiploader 1 flowed off the conveyor belt due to one of the ship's plugs not being in place resulting in water/slurry entering Port Kembla | | | | | | | | | |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
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| | | <p>Harbour.</p> <p>PKCT was issued with a Formal Warning Letter by the EPA dated 25.07.14 for breaching its concentration limits as a result of the discharges in March / April 2014.</p> <p>The incident on the 5 June 2014 was deemed by the EPA to constitute a breach of this Condition and PKCT was issued with an Official Caution dated 10.09.14. In response, PKCT engaged an external consultant to review the pump arrangement and to identify practical modifications and or upgrades to the system. Upon completion of the review PKCT implemented the following upgrades:</p> <ul style="list-style-type: none"> • Blocking the RCP stockpile drain to prevent contaminated water inflow • Repairing the western containment wall of the stockpile where required to prevent seepage • Diverting the flow from No.1 Berth South Position Pump 17 towards T3 Pond • Installing new power supply cable, communication cable and ultrasonic level detector, in the pump 09 sump with communications including alarms and monitoring to the Main Control Room <p>The incident on the 18 March 2015 was deemed by the EPA to constitute a breach of this Condition and PKCT was issued with a Formal Warning dated 3.09.15. In response PKCT reviewed the Shiploader Launder design and implemented modifications. The new arrangement is considered by PKCT to be less prone to blockages and includes a water supply connection which can be used to clear accumulated material.</p> <p>PKCT was also issued with a Formal Warning (dated 19.07.16) in relation to a breach of L1.1 for the two shiploader incidents in July and August 2015.</p> <p>In addition, PKCT identified a number of exceedances of its TSS</p> | | <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance.</p> |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action | | | | | | | | | |
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| | | <p>and pH criteria at Licenced Discharge Point (LDP) 16. These are discussed further under Condition L2.1.</p> <p>On the basis of the above incidents and exceedances, this condition has been assessed as non-compliant. It is noted that PKCT has since implemented a number of improvements to its surface water management system (discussed further under L1.2 below) and that no incidents causing or threatening material harm to the environment were reported in 2016.</p> | | | | | | | | | | | |
| EPL 1625, L2.1 & L2.4 | <p>Concentration Limits</p> <p>For each monitoring/discharge point or utilisation area specified in the table below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p> <p>Water and/or Land Concentration Limits:</p> <p>Point 16</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>100 Percentile Concentration Limit</th> </tr> </thead> <tbody> <tr> <td>Oil & Grease</td> <td>Visible</td> <td>Not Visible</td> </tr> <tr> <td>Total Suspended Solids</td> <td>Milligrams per litre</td> <td>50</td> </tr> </tbody> </table> | Pollutant | Unit of Measure | 100 Percentile Concentration Limit | Oil & Grease | Visible | Not Visible | Total Suspended Solids | Milligrams per litre | 50 | <p>The following non-compliances were noted concerning concentration limits for the audit period:</p> <p><u>2014:</u></p> <ul style="list-style-type: none"> Five TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 4 April 2014 = 110 mg/L, 6 April 2014 = 96 mg/L, 14 August 2014 = 77 mg/L, 18 November 2014 = 69 mg/L and 20 November 2014 = 52 mg/L. <p><u>2015:</u></p> <ul style="list-style-type: none"> Four TSS limit non-compliances were recorded at LDP 16 on the following dates: <ul style="list-style-type: none"> 1 May 2015 = 60 mg/L, 10 May 2015 = 57 mg/L, 12 May 2015 = 110 mg/L and 13 May 2015 = 54 mg/L. <p>There were no exceedances recorded in 2016 and up until the 10 April 2017. Additionally there were no exceedances of the oil and grease criteria during the audit period.</p> <p>Improvements to the water management system have been conducted under PRP 12 – <i>Implement Upgrades to Stormwater Pollution Control System</i>. Completion of the Central Pond upgrade works was completed in January 2016. EPL 1625 was</p> | <p>Non-compliant</p> <p>Low risk</p> | <p>Finding accepted</p> <p>Refer to finding EPL 1625, L1.1 for response.</p> |
| Pollutant | Unit of Measure | 100 Percentile Concentration Limit | | | | | | | | | | | |
| Oil & Grease | Visible | Not Visible | | | | | | | | | | | |
| Total Suspended Solids | Milligrams per litre | 50 | | | | | | | | | | | |

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| | | <p>varied by notice 1548264 issued on 16 January 2017 with removal of PRP 12 'Implement Upgrades to Stormwater Pollution Control System'. The EPA received the effectiveness review from PKCT titled <i>PKCT Central Pond Upgrade, Pollution Reduction Program 12, Stage 1(e) Review of Environmental Performance of the Upgrade Works</i>. The EPA reported in a Notice of Variation dated 16 January 2017 (Ref: EF13/3447) that <i>"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"</i>. 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 <i>"measured monthly TSS average pre-upgrade [in the Central Pond] was 202 mg/L and as of June 2016 79 mg/L post upgrade"</i>. EPL 1625 discharge criteria is 50 mg/L.</p> <p>Other activities and improvements noted to the stormwater system during the reporting period included:</p> <ul style="list-style-type: none"> • Installation of a coagulant dosing system at the Central Pond in August 2015. The system uses a coagulant injected into the Central Pond which mixes with the water as it is transferred through to the Settlement Lagoon. Once in the Settlement Lagoon, the mixture assists with removal of ultrafine particles that are not removed by the existing polymer dosing system at the Settlement Lagoon. • A dredging program was undertaken in August 2015 and September 2015 in the Settlement Lagoon. The program utilised a suction cutter dredge feeding a wet-slurry into a network of geotextile bags. The bags allowed water to escape while trapping and storing sediment for later removal. Ongoing monitoring is required; however, Site management reported an improvement in water clarity as well as a reduction in the TSS levels of discharge water since dredging was | | |

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| | | <p>completed. Site management also reported that use of the geotextile bags allows scheduled cleaning of the Settlement Lagoon regardless of the weather conditions.</p> <ul style="list-style-type: none"> • An unsealed area near the Central Pond Pump was sealed in February 2016. • Isolation of inflows into ponds allows for drying of slurry. • Sealing of entry/exit ramps into ponds minimises sediment 'drag' out of the ponds and onto internal roadways. <p>It is acknowledged that PKCT has made improvements to the stormwater system that have facilitated recent compliance with EPL 1625 criteria; however, given the above exceedances during the audit period this condition was found to be non-compliant.</p> | | |
| EPL 1625, O1.1 | <p>OPERATING CONDITIONS</p> <p>Activities Must be Carried out in a Competent Manner</p> <p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p> | <p>PKCT has established processes for managing the processing, handling, movement and storage of coal including:</p> <ul style="list-style-type: none"> • 24 / 7 site operational control via the Main Control Room which includes monitoring of site conditions and weather forecasts and operating sprays and other controls as required, • Under wagon monitoring to detect poorly loaded trains. • Spillage recovery systems and processes to recover as much product coal as possible • Event Management System for the investigation and corrective action of incidents and complaints <p>The EPA undertook a compliance audit of PKCT's rail unloading facility on the 30.05.14. The audit identified a non-compliance related to coal particles on wagon surfaces and coarse coal particles and lumps of coal on wagon bodies. This was considered a breach of this Condition by the EPA and was subsequently included as a non-compliance with O1.1 in PKCT's 2014-15 Annual Return. PKCT developed an Action Plan which was submitted it to the EPA and included as Attachment B of the 2014-15 Annual Return. The EPA undertook a follow up</p> | <p>Non-compliant</p> <p>Low risk</p> <p>REC-2017-04 – Request from waste contractor that it provides the destination of waste taken off site.</p> <p>OFI-2017-05 – Update Waste Management Plan to reference part b) of this Condition and include further discussion of how PKCT meet these requirements.</p> | <p>Findings accepted</p> <p>PKCT accepts that the item of non-compliance associated with this finding occurred as a 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.</p> |

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| | | <p>inspection on the 28.08.15 to assess the implementation status of corrective actions from the first audit. PKCT provided the EPA with an update of the status of the action plan by email dated 4.09.15. The EPA provided PKCT with comments on its assessment of the status of corrective actions by letter dated 29.09.15. In its letter the EPA acknowledged the actions taken by PKCT represent significant steps towards constituting reasonable and practical measures to minimise or prevent fine coal deposition on the exterior of wagons. However the EPA was still concerned with parasitic coal on the exterior of wagons being unloaded. An Environmental Improvement Program (EIP) for Wagon Monitoring and Reporting was included in PKCT's EPL. This was completed by PKCT by the 30.09.16 and removed from its EPL. An EIP for Train Condition Exception Reporting was included in the EPL (refer U3.1).</p> <p>Given the non-compliance with this condition identified during the audit period by the EPA, this condition has been assessed as non-compliant. However it is noted that since this time, PKCT has implemented a number of improvement measures relating to coal storage, handling and movement, in particular monitoring of wagons and therefore the risk level is considered low.</p> <p>PKCT has developed a Waste Management Plan which outlines how PKCT manage the waste generated by its activities. The Waste Management Plan (p.8) notes that waste shall be kept separate, shall be contained and disposed of in accordance with legal requirements and that waste generated on-site shall be managed to reuse on site in the first instance, followed by offsite recycling or reuse and as a last resort sent off site for disposal.</p> <p>General site waste was managed by waste contractor Veolia during the audit period. Veolia provide PKCT with a 'Waste Contract Monthly Report' that summarises the volume / mass and type of waste removed from site for either disposal, reprocessing or recycling. The reports do not include details of the destinations of the waste taken offsite (either for recycling or disposal). However Transport Certificates for trackable waste</p> | | <p>Action by: PKCT Environmental Specialist</p> <p>Completion date: EIP ongoing</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/09/2017</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/09/2017</p> |

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| | | <p>(J120 waste oil / hydrocarbons mixtures / emulsions in water) which is taken to Veolia's Camelia facility are provided to PKCT. PKCT also has dockets of the scrap metal recycling (taken to T&D Metals and Demolitions, Unanderra). Veolia holds an EPL for waste transporter activities and has numerous premises licensed to accept waste.</p> <p>Evidence of waste segregation was observed during the audit site inspection. Separate bins for scrap metal recycling and cardboard recycling were observed. A battery recycling facility was installed in 2015 (sighted).</p> <p>Waste oils were reportedly transported back to the Workshop and deposited into dedicated waste oil intermediate bulk containers (IBCs) (sighted during audit site inspection).</p> | | |
| EPL 1625, O2.1 | <p>Maintenance of Plant and Equipment</p> <p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p> | Refer to DA 08_0009 S2.C13 | 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. | <p>A Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 was available for review. A Pond Capacity spread sheet was available that showed sediment volumes for the Settlement lagoon, Southern Pond, Northern Pond, TS1 Pond, Tower 3 Pond, Workshop Pond and Central Pond and the percentage design capacity based on inputted data. The ponds were last surveyed in June 2016 with the exception of the Central Pond which was surveyed in October 2016.</p> <p>It was not clear how the Pond Capacity Tables spread sheet related to the Pond Settlement Level Monitoring Procedure,</p> | Non-compliant Medium Risk REC-2017-05 – Update the Pond Settlement Level Monitoring Procedure, PR.HS.922, Doc ID 922 to include reference to the Pond Capacity spread sheet. | 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 |

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| | | <p>PR.HS.922, Doc ID 922 given no reference was made of the spread sheet in the procedure.</p> <p>The following is noted:</p> <ul style="list-style-type: none"> On 22 April 2015 it was reported that the sediment level in the Central Pond (LDP 23) was at approximately 30%. Site management reported that repeated wet weather events prevented cleanout operations. Site management reported that sediment levels were cleaned out to less than 5% on 28 May 2015 when weather permitted. The non-compliance was reported in the Annual Return for the 2015 / 2016 period. The Central Pond Upgrade project was completed in February 2016. A dredging program was undertaken in August 2015 and September 2015 in the Settlement Lagoon. The program utilised a suction cutter dredge feeding a wet-slurry into a network of geotextile bags. The bags allowed water to escape while trapping and storing sediment for later removal. Ongoing monitoring is required; however, Site management reported an improvement in water clarity as well as a reduction in the TSS levels of discharge water since dredging was completed. Site management also reported that use of the geotextile bags allows scheduled cleaning of the Settlement Lagoon regardless of the weather conditions. The northern pond was surveyed on the 1 June 2015 and found sediment to be at 21% of design capacity. The pond was desilted and then re-surveyed on the 10 June 2016 which confirmed sediment volume at 1% of design capacity. <p>Given the reported Annual Return non-compliance for the period 2015 / 2016 this condition was found to be non-compliant.</p> | | <p>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 sediment levels in the ponds and ensure compliance with Condition 04.2 of EPL1625</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/09/2017</p> |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action | | | | | | | | |
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| EPL 1625, M1.3 | <p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was taken;</p> <p>b) the time(s) at which the sample was collected;</p> <p>c) the point at which the sample was taken; and</p> <p>d) the name of the person who collected the sample.</p> | <p>The EPL Water Quality Data spreadsheet included the date, time and initials of the person who collected the sample for each of the monitoring points.</p> <p>Depositional dust sampling was being undertaken by SGS. SGS complete an Environmental Dust Sheet which includes the location of each dust gauge, the date it was collected and the initials of the person who collected it. The time at which the sample was collected was not recorded. This is not considered to be critical for depositional dust monitoring as the Australian Standard requires that sampling is conducted every 30 days +/- 2 days, however for completeness it should be included on the dust sheet.</p> | <p>Compliant</p> <p>OFI-2017-11 - Ensure the contractor undertaking the depositional dust monitoring includes a record of the time the depositional dust gauges were collected.</p> | <p>Finding accepted</p> <p>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 gauges were collected.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/07/2017</p> | | | | | | | | |
| EPL 1625, M2.1 and M2.2 | <p>Monitoring Concentration of Pollutants Discharged and Air Monitoring Requirements</p> <p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified below. The licensee must use the sampling method, units of measure, and sample at the frequency specified.</p> <p>Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Particulates – Deposited Matter</td> <td>Grams per square metre per month</td> <td>Monthly</td> <td>AM-19</td> </tr> </tbody> </table> | Pollutant | Unit of Measure | Frequency | Sampling Method | Particulates – Deposited Matter | Grams per square metre per month | Monthly | AM-19 | <p>Particulates – deposited matter was using dust deposition gauges at the specified locations (Pointe 1-9, 12, 15, 17, 18, 19). TSP, PM₁₀ and PM_{2.5} monitoring was conducted using OSIRIS instruments located north and south of the coal terminal (Points 20 and 21).</p> <p>There were a number of periods in the 2015/2016 annual return period where non-compliances were noted in the DDG network and in the real-time monitoring network. Reasons provided for the non-compliances were:</p> <ul style="list-style-type: none"> Bottle breakages due to glass fatigue, vandalism or bottles broken in transit to the laboratory. Procedures have been modified to deal with the breakages. Broken bottles still appear to be a problem after this point with broken bottle attributed to cracks in old bottles reported in May and August 2016. Access restrictions due to Point 9 (Sydney Water RWTP). Access requirements changed during the licence period | <p>Non-compliant</p> <p>Low risk</p> | <p>Finding accepted.</p> <p>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.</p> <p>The events and associated actions have been closed off by the EPA. PKCT does not propose any further</p> |
| Pollutant | Unit of Measure | Frequency | Sampling Method | | | | | | | | | |
| Particulates – Deposited Matter | Grams per square metre per month | Monthly | AM-19 | | | | | | | | | |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action | | | | | | | | | | | | | | | | | | | | | |
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| | <p>Point 20, 21</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td rowspan="3">Micrograms per cubic metre</td> <td rowspan="3">Continuous</td> <td rowspan="3">Continuously</td> </tr> <tr> <td>PM2.5</td> </tr> <tr> <td>Total Solid Particles</td> </tr> </tbody> </table> | Pollutant | Unit of Measure | Frequency | Sampling Method | PM10 | Micrograms per cubic metre | Continuous | Continuously | PM2.5 | Total Solid Particles | <p>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.</p> <ul style="list-style-type: none"> Minor maintenance issues related to ongoing operation of the OSIRIS monitor reduced the data capture over the licence period. Overall the data capture was still at a high level and although a technical non-compliance, the reaction to the outages appears reasonable. <p>Due to the non-compliances with this requirement reported in the Annual Returns, this condition has been assessed as non-compliant.</p> | | actions associated with this non-compliance. | | | | | | | | | | | |
| Pollutant | Unit of Measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | |
| PM10 | Micrograms per cubic metre | Continuous | Continuously | | | | | | | | | | | | | | | | | | | | | | |
| PM2.5 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Solid Particles | | | | | | | | | | | | | | | | | | | | | | | | | |
| EPL 1625, M2.3 | <p>Water and/ or Land Monitoring Requirements</p> <p>Point 16</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oil & Grease</td> <td>Visible</td> <td rowspan="3">Daily During Any Discharge</td> <td>Visual Inspection</td> </tr> <tr> <td>pH</td> <td>pH</td> <td rowspan="2">Grab Sample</td> </tr> <tr> <td>TSS</td> <td>Milligrams per litre</td> </tr> </tbody> </table> <p>Point 22,23,24,25,26</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oil & Grease</td> <td>Visible</td> <td>Daily During</td> <td>Visual Inspection</td> </tr> </tbody> </table> | Pollutant | Unit of Measure | Frequency | Sampling Method | Oil & Grease | Visible | Daily During Any Discharge | Visual Inspection | pH | pH | Grab Sample | TSS | Milligrams per litre | Pollutant | Unit of Measure | Frequency | Sampling Method | Oil & Grease | Visible | Daily During | Visual Inspection | <p>The EPL Water Quality Data spreadsheet included monitoring results for Oil and Grease, pH and TSS at LDP16, LDP22, LDP23, LDP25, LDP26. This monitoring included routine monitoring (not required by the EPL) in addition to monitoring during discharges.</p> <p>Results for LDP24 were not included in the spreadsheet. A review of the 2014-15 Annual Return indicated no monitoring was required as there were no discharges from this pond (Tower 3 Pond). A review of the 2015-16 Annual Return provided results for one monitoring event.</p> <p>PKCT reported in its 2014-15 Annual Return that there was one instance (13.02.15) where a sample was misplaced and as a result there was insufficient water to undertake a TSS analysis.</p> <p>Section 66(6) of the POEO Act requires holders of an EPL to make any pollution monitoring data obtained in compliance with any monitoring conditions attached to their EPL publicly available. The EPL 1625 Monthly Environment Report available on PKCT's website includes results of monitoring at LDP16 but not of the other wet weather discharge points.</p> | <p>Compliant</p> <p>OFI-2017-12 – Review the requirements of the POEO Act for publishing monitoring data</p> | <p>Finding accepted</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/07/2017</p> |
| Pollutant | Unit of Measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | |
| Oil & Grease | Visible | Daily During Any Discharge | Visual Inspection | | | | | | | | | | | | | | | | | | | | | | |
| pH | pH | | Grab Sample | | | | | | | | | | | | | | | | | | | | | | |
| TSS | Milligrams per litre | | | | | | | | | | | | | | | | | | | | | | | | |
| Pollutant | Unit of Measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | |
| Oil & Grease | Visible | Daily During | Visual Inspection | | | | | | | | | | | | | | | | | | | | | | |

| Condition | Condition Requirement | | | | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
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| | pH | pH | Discharge | Grab Sample | | | |
| | TSS | Milligrams per litre | | | | | |
| EPL 1625, M5.2 | <p>The record must include details of the following:</p> <ol style="list-style-type: none"> the date and time of the complaint; the method by which the complaint was made; any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; the nature of the complaint; the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken. | | | | <p>As described above community complaints were recorded as Events within EMS. A review of the 'Event Reports' for the complaints received during the audit period indicated:</p> <ul style="list-style-type: none"> The method of the complaint is not a mandatory field within the EMS but was observed to be included in the 'Brief Description' for the examples sighted. The personal details of the complainant are not mandatory fields within the EMS but the name and address was observed to be included in the 'Brief Description' for the examples sighted. The complainant's phone number was not recorded in the 'Event Report'. Personal details including name and phone number are collected by the call centre and provided to PKCT for follow up. <p>The Event Reports sighted were noted to include a description of the nature of the complaint and action taken by PKCT including follow up action with the complainant.</p> | <p>Compliant</p> <p>OFI-2017-13 - Consider adding the following fields to the 'Event Report' to ensure they are always captured:</p> <ul style="list-style-type: none"> method by which complaint was made; complainant personal details | <p>Finding accepted</p> <p>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;</p> <ul style="list-style-type: none"> method by which complaint was made; complainant personal details <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: If feasible, PKCT will incorporate the changes by 31/12/2017</p> |
| EPL 1625, M7.1 | <p>OTHER MONITORING AND RECORDING CONDITIONS</p> <p>Noise Monitoring</p> <p>Noise from the premises must be measured bi-annually (to measure summer and winter levels) via a combination of attended and un-</p> | | | | <p>Bi-annual attended and unattended noise monitoring was undertaken at identified residences during the audit period until April 2016.</p> <p>As required by M7.2 below, a review of noise monitoring was undertaken by PKCT and as noise levels were below the Noise Impact Criteria in all noise surveys undertaken since 2009, PKCT</p> | <p>Not verified</p> <p>REC-2017-08 Seek a variation to the EPL to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.</p> | <p>Finding accepted</p> <p>REC-2017-08 - PKCT has initiated discussions with the EPA in regards to this finding. PKCT will formally request a</p> |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
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| | <p>attended noise monitoring measures at the potentially affected premises identified in the Limit Conditions section of this licence.</p> | <p>sought permission to remove the requirement for bi-annual monitoring from the EPA and DP&E (by letters dated 30.08.16). This request was accepted by the DP&E by letter dated 16.03.17 however it was reported that the EPA did not formally respond to the request.</p> <p>As formal EPA approval to remove the requirement for monitoring could not be demonstrated, this condition could not be verified.</p> | | <p>variation to EPL 1625 to remove the requirement for bi-annual noise monitoring as permitted by EPL Condition M7.2.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: Formal request to EPA to be made by 31/08/2017.</p> |
| EPL 1625, R2.1 | <p>Notification of Environmental Harm</p> <p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p> | <p>The following notifications were made to the Environment Line during the audit period:</p> <ul style="list-style-type: none"> 18 March 2015: washdown water containing coal fines was discharged into Port Kembla harbour during routine cleaning of Shiploader 1 over Coal Berth 102. 28 July 2015: washdown water containing coal fines was discharged into Port Kembla harbour during a routine washdown of Shiploader 2 over Coal Berth 102. 28 August 2015: washdown water containing coal fines was discharged into Port Kembla harbour during loading of the 'C' Atlas which was berthed at the premises. <p>In addition the following were reported to PKCT's local EPA officer:</p> <ul style="list-style-type: none"> Turbid water discharges on the 25-27th March and 4th and 6th April 2014 following a storm event. Verbally communicated to EPA on the 9 April 2014 and by email dated 10.04.14. The EPA requested PKCT submit an incident report under R3.1 (refer R3.1). Following investigation, PKCT were issued with a Formal Warning dated 21.07.14. An incident on the 5 June 2014 where a pit sump 'Pump 9 Sump' overflowed to port Kembla Harbour during a storm | <p>Non-compliant</p> <p>Low risk</p> <p>REC-2017-06 – Revise the Incident Reporting and Investigation Procedure PR.HS.124 to include further guidance on determining material harm to the environment (as per Section 147 of the POEO Act).</p> | <p>Finding accepted</p> <p>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).</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 30/09/2017</p> |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|----------------|--|--|---|--|
| | | <p>event was not considered material and was not immediately reported to the Environment Line but reported to the EPA via email on the 6.06.14. Following investigation (refer R3.1 below), the EPA issued PKCT with an Official Caution for the incident dated 10.09.14. The Official Caution also noted that PKCT may have breached Section 152 of the Protection of the Environment Operations (POEO) Act 1997 which relates to the duty to immediately notify pollution incidents. In response PKCT has revised its incident report within EMS to include a category under 'Notification Type' for events which are 'Not Material- EPA notification may be required, contact manager'.</p> <p>On the basis of the stormwater discharge events in March/April 2014 and the incident on the 5 June 2014 not being notified immediately to the EPA via the Environment Line, this condition has been assessed as non-compliant. However given improvements to reporting since this time it has been assessed as low risk.</p> | | |
| EPL 1625, R4.2 | <p>Wet Weather Overflow Reporting</p> <p>The following must be submitted to the EPA with the Annual Return:</p> <p>Details of any overflow from Point 22, Point 23, Point 24, Point 25 and/or Point 26 specified by Conditions P1.2 and P1.3.</p> <p>The following information must be provided for each overflow:</p> <ul style="list-style-type: none"> • a tabular presentation of the concentration of each pollutant specified in Condition M2.3; • date and time of the commencement of each overflow; • an estimate of the volume of each | <p>A Wet Weather Overflow Report was included with the Annual Return for the period 2014 / 2015 for LDP 26. Overflow events were reported on the following days:</p> <ul style="list-style-type: none"> • 24 March 2015 from LDP 23 and LDP 26. The discharge from the Central Pond (LDP23) was considered to not be permitted by the EPL as sediment levels were above 20% (refer to Condition O4.2). <p>A Wet Weather Overflow Report was included with the Annual Return for the period 2015 / 2016 for LDP 22, LDP 23, LDP 24 and LDP 25. Overflow events were reported on the following days:</p> <ul style="list-style-type: none"> • 20 April 2015 to 22 April 2015 from LDP 23 and LDP 25. • 25 August 2015 from LDP 22, LDP 23, LDP 24 and LDP 25. <p>The report(s) included:</p> <ul style="list-style-type: none"> • A tabular presentation of the concentration of each | <p>Compliant</p> <p>OFI-2017-14 – The EPL Water Quality Data spread sheet should include a column that indicates whether samples were taken during an overflow event or were part of the routine monitoring program.</p> | <p>Finding accepted</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion date: Action Complete.</p> |

| Condition | Condition Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|-----------|--|---|------------------------------------|----------------------|
| | <p>stormwater overflow and over what time period the overflow occurred;</p> <ul style="list-style-type: none"> • 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. | <p>pollutant specified in Condition M2.3.</p> <ul style="list-style-type: none"> • Date and time of the commencement of each overflow. • An estimate of the volume of each stormwater overflow and the time period the overflow occurred. • The weather conditions at the time of each overflow, that specified the amount of rainfall on a daily basis that had fallen a) on the day(s) of the overflow and b) for each day of the seven day period prior to the overflow. • An explanation as to why the overflow occurred. • An estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1. • The location(s) of the discharge. • Whether the discharge was permitted by the licence. <p>The EPL Water Quality Data spreadsheet included monitoring data for LDP 16, LDP 22, LDP 23, LDP 25 and LDP 26 and included data including, but not limited to, TSS, Oil & Grease and pH. For the satellite ponds (LDP 22, LDP 23 and LDP 25) it was not possible to determine if samples were taken during an overflow event or as part of a routine sampling program.</p> | | |

Table 3 Drivers Code of Conduct

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|---|---|---|---|--|
| <p>PKCT Drivers Code of Conduct 006</p> | <p>Limit speed to 50km/hr on Bellambi Lane.</p> | <p>Wollongong Coal heavy haulage induction and Bohud DCC detail requirements for Bellambi Lane including speed. Wollongong Coal uses an RFI system to track vehicle movements to/ from their colliery including the use of Bellambi Road. The system monitors speeds compliance and travel times. Information on truck speeds and travel times on route and specifically within Bellambi Lane are checked daily by Bohud Management, and alarms are triggered automatically if a breach occurs.</p> <p>An extract of the vehicle tracking system for the period between 05/05/2016 and 26/05/2016 was sighted by the audit team. It showed that average speeds for trucks during this time periods were recorded at 50km/h or lower.</p> <p>PKCT undertakes Task Observations to assist in monitoring compliance with the DCC. The PKCT Task Coach & Observation Sheet: Drivers Code of Conduct (F.HS.169) was noted to include a check that trucks adhere to speed limits and details the 50 km/h speed limit on Bellambi Lane. A screenshot of the Task</p> | <p>Compliant</p> <p>OFI-2017-15 - Consider revising the format of the DCC Monthly Report to require transport companies to report on some of the specific requirements of the DCC, such as:</p> <ul style="list-style-type: none"> - speed limits on Bellambi Lane, - no compression braking approaching the intersection of Port Kembla Road and Springhill Road and on Masters Road - ensuring tailgates are locked before leaving PKCT - using designated routes to and from site; - limiting noise where possible on Bellambi Lane. <p>OFI-2017-16 - Ensure trucking companies are thoroughly completing the DCC Monthly Reports. Where the companies are ticking that they are completing internal audits of the Key Operational Focus Areas, this could be improved by including the date that the audits were undertaken.</p> | <p>Findings accepted</p> <p>OFI-2017-15 – PKCT will review the format of the DCC Monthly Report to request more specific information from the transport companies where applicable.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: DCC Monthly Report updated and distributed to transport companies by 31/09/2017.</p> <p>OFI-2017-16 – PKCT will review the DCC Monthly Report format to incorporate dates that audits were undertaken by the trucking companies.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/09/2017.</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|---------------|-------------------------|--|------------------------------------|----------------------|
| | | <p>Observations logged in PKCT's SharePoint system indicated that Task Observations were being undertaken regularly (typically monthly). It is noted that not all items on the Task Observation Sheet are completed each month as observations may focus on specific issues. Some examples sighted (e.g. 26.12.15 and 6.05.16) included a check that the speed limit on Bellambi Lane was being adhered to.</p> <p>The DCC Monthly Report completed by the road transport companies and provided to PKCT, includes a 'Checklist of Key Operational Focus Areas which has under the focus area of 'Audits and Enforcement' a check of speed of trucks. This is not always completed by the transport companies. Some companies tick that they are undertaking audits.</p> <p>An opportunity for improvement exists to include more specific DCC requirements within the DCC Monthly Report and ensuring that the transport companies are completing the reports adequately.</p> | | |

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|-------------------------------------|---|---|---|--|
| PKCT Drivers Code of Conduct 009 | Utilise the truck wash at PKCT after tipping. | <p>The design of the truck unloading facility requires all trucks delivering to the site to travel through the truck wash. Site observations of the truck wash indicated all trucks pass through the truck wash, with drivers adequately cleaning the T-bar. Supplemental hoses are provided for drivers to wash down trucks manually. Site observations indicated that trucks were sufficiently clean on exit from the truck wash. Task Coach and Observation Sheet sighted (CTO-01532 20/06/2016) showed a minor spillage incident on an internal road. This was appropriately dealt with by PKCT.</p> <p>Monitoring of effectiveness of truck wash was done through driver self-reporting, and monthly DCC reports. No continuous monitoring of the cleanliness of trucks leaving the facility was being undertaken.</p> <p>A second supplemental truck wash was provided on the southern end of the PKCT for deliveries not using the main unloading facility. The audit team was informed that this wash was also used during maintenance of the main wash facility. It is however noted that no management procedures outline</p> | <p>Compliant</p> <p>OFI-2017-17 - Consider introducing a process for monitoring trucks exiting the truck wash to ensure the effectiveness of the facility.</p> | <p>Finding accepted</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/12/2017</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|----------------------------------|---|---|---|--|
| | | <p>what would be put into place when this is required.</p> <p>No complaints or incidents have been recorded by PKCT during the audit period relating to unwashed trucks leaving the site.</p> | | |
| PKCT Drivers Code of Conduct 011 | Operate the vehicle in a manner that minimises vehicle noise. | <p>Wollongong Coal heavy haulage induction and Bohud DCC and identify this issue as a focus area and is specific that drivers be stringent about limiting noise and specific noise to avoid, due to residents. Bohud drivers are tested on the DCC via a checklist appended to the PKCT DCC.</p> <p>Noise Minimisation Controls are included in the DCC Monthly Report, however, is not specifically included in the Internal Audit Worksheets used in the annual audits of the transport companies.</p> <p>One enquiry about truck noise on Port Kembla Road was received by PKCT on 1 April 2016. The enquiry and subsequent follow-up, and investigation by PKCT was sighted by the audit team. A noise assessment on Swan Street was carried out by Wilkinson Murray Pty Ltd as a result of the enquiry. PKCT requested the transport companies re-communicate the requirements and undertake driver monitoring to ensure compression</p> | <p>Compliant</p> <p>OFI- 2017-18 - Include a check of operating vehicles to minimise noise within the Internal Audit Worksheets.</p> | <p>Finding accepted</p> <p>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.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: Audit Worksheet updated by 31/08/2017</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|----------------------------------|---|---|---|---|
| | | <p>braking at the Springhill Rd/ Port Kembla Rd intersection is not occurring. It is assessed that the enquiry was appropriately responded to by PKCT. It is noted that the enquiry was not a noise complaint by the resident, however an observation. Refer also to DA 08_0009, S3.C3.</p> <p>No complaints or other incidents have been recorded by PKCT during the audit period relating to truck noise.</p> | | |
| 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. | <p>The PKCT Task Coach and Observation Sheet includes a specific statement and assessment criteria in relation to this condition. Task Coach and Observation Sheet sighted (CT)-01501 05/05/2016, CTO-01479 26/04/2016) shows compliance with major arterial roads.</p> <p>The use of the major arterial roads by haulage trucks is not specifically outlined in the DCC Monthly Report and Internal Audit Worksheet. An example of the Bulktrans observation sheet (Southern Bulk Haulage: Behavioural Observations) was sighted and noted to include a check that trucks are travelling on the correct routes outlined in driver inductions.</p> <p>One complaint was received by</p> | <p>Non-compliant</p> <p>Low risk</p> <p>Refer to OFI-2017-15</p> | <p>Finding accepted</p> <p>Refer to OFI-2017-15 for actions.</p> |

| Condition No. | Condition / Requirement | Comment / Finding | Compliance Status & Recommendation | PKCT Response/Action |
|---------------|-------------------------|--|------------------------------------|----------------------|
| | | <p>PKCT in December 2014 (EV-0506) in relation to haulage trucks deviating from the major arterial roads. It was reported that trucks were observed to be parking near the takeaway premises at the intersection of Princes Highway and Mt Ousley Road. The enquiry and subsequent follow-up, and investigation by PKCT was sighted by the audit team. It was found that Bulktrans had not informed their drivers to drive only on their route to and from the Mine site and Port. Bulktrans committed to directing their workforce to use only major arterial roads. On the basis of this incident, this requirement has been assessed as non-compliant.</p> <p>No other complaints or incidents have been recorded by PKCT during the audit period relating to trucks using the designated routes.</p> | | |

Table 4 Statement of Commitments

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

Table 1 2014 IEA - Non-compliant Conditions

| # | Condition # | 2014 IEA Recommendations | 2017 Update - Assessment by AECOM | 2017 - Status of Recommendation | PKCT Response/Action |
|---------|--------------|--|--|---|--|
| 10 | O4.1 | <p><i>It is recommended that PKCT: Complete, finalise and implement Settlement Lagoon Cleanout Process document. Document/record implementation of document implementation (e.g. staff training and maintenance schedules).</i></p> | <p>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.</p> | <p>Ongoing</p> <p>OFI-2017-20 – Update the Settlement Lagoon Cleanout Process document</p> | <p>Finding Accepted</p> <p>OFI-2017-20 - PKCT will update the Settlement Lagoon Cleanout Process document.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: 31/08/2017</p> |
| 13 & 14 | O3.1 O3.2 | <p><i>It is recommended that PKCT:</i></p> <ul style="list-style-type: none"> <i>Conduct an internal review of compliance to conditions O3.1 and O3.2 relating to dust emissions beyond the boundary of the site.</i> <p><i>Review the train receipt system to ensure all reasonable and feasible measures are employed to prevent or minimise dust impacts beyond the rail loop.</i></p> | <p>PKCT reported that it undertook an internal review involving the sampling of residential dust samples and testing to categorise dust sources. The results indicated that coal dust was typically 9-20% of the overall sample.</p> <p>PKCT has an Environmental Improvement Program (EIP) in its EPL (U1.1) to undertake a particulate matter control best practice study. The reporting associated with this EIP is due in June and September 2017.</p> <p>PKCT also has an EIP in its EPL for the use of real time particulate monitoring data for operational control. The reporting associated with this EIP is due in April 2017.</p> | <p>Ongoing</p> | <p>Finding Accepted</p> <p>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.</p> <p>The EIP U1 “Particulate Matter Control Best Practice Study” is currently in progress and will be submitted by the due dates as described in PKCT’s EPL.</p> |

10.3 Summary of additional Recommendations and Opportunities for Improvement

| 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: <ul style="list-style-type: none"> • Update the Monitoring section to reflect that bi-annual noise monitoring is no longer undertaken. • Consider including a sleep disturbance assessment in accordance with the relevant EPA's guidelines (i.e. investigation of maximum noise levels) in any future noise compliance surveys. | 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 | REC-2017-11 | A document revision section should be included on all | REC-2017-11 – Document revision is currently tracked through PKCT's |

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| (general) | | management plans so that the period between reviews as well as which section/area of the plan has been revised can be identified. | 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: <ul style="list-style-type: none"> • Update Section 6.3 to reflect that the National Greenhouse and Energy Reporting Act and Regulations are Commonwealth rather than NSW legislation. • Update Table 9-1 to reflect changes to noise monitoring and to include requirements relating to monitoring of sediment levels in ponds and train wagon condition monitoring • Update Table 9-2 to reflect recent changes to reporting requirements e.g. remove requirements to report against Energy and Water Savings Plans, and to provide Interim Environmental Management Reports (no longer required), include requirements for Ambient Air Monitoring Report, Wet Weather Overflow Reporting and Train Condition Exception Reporting required by the EPL. | 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: <ul style="list-style-type: none"> • Include references to all surface water licenced discharge points specified in EPL 1625 including monitoring and reporting requirements. • Clearly identify the water storage structures that relate to the LDPs specified in EPL 1625. • Clearly state that criteria specified in Condition L2.5 of EPL 1625 only applies to LDP 16. | REC-2017-14 – Refer to DA 08_0009, S3.C13, for PKCT response/actions. |

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|--|-------------|---|--|
| 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: <ul style="list-style-type: none"> • Include the current NGER reporting thresholds and undertake an annual review against the threshold to determine whether NGER reporting is likely to be triggered. • Update the GHG&EE Management Plan to outline the process for calculating greenhouse gas emissions to ensure that the latest emissions factors are used. • Include further details within the GHG&EE Management Plan of how energy efficiency is reviewed during the planning phase of a project and how this is implemented, tracked and measured. | 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. |