Port Kembla Coal Terminal
Port Kembla Road
Wollongong, 2500
New South Wales
Australia
Phone: +61 2 4221 8224

pkct.com.au

Port Kembla Coal Terminal (PKCT) Approval 08_0009: Department of Planning, Housing and Infrastructure (DPHI) – Independent External Audit 29th January 2026 (date of site visit)

On 29 January 2026, Environmental Resources Management Australia Pty Ltd (ERM) undertook a Triennial Independent Environmental Audit at Port Kembla Coal Terminal as per the requirements of Project Approval 08_0009.

As per Schedule 4, Condition 6, of Approval 08_0009 the tables below represent PKCT's formal response (Action Plan) 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.

Each of the findings below will be given a unique identification number managed through PKCT's Event Management System (WERC).

Summary of Audit Findings

Review	Non-compliances (NC)	Observations (Obs)
Statutory Instruments	Nil	1
Implementation of Plans	Nil	2

<table>
<tr><th>Item No</th><th>Assessment Requirement</th><th>Comment</th><th>Audit Classification</th><th>Recommendation</th><th>PKCT Response / Action</th></tr>
<tr><td colspan="6">Minister's Conditions of Approval PA 08_0009</td></tr>
<tr><td>Sch. 3-7</td><td>The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 3 to 5 at any residence.

Table 3: Long term impact assessment criteria for particulate matter
<table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>90 µg/m3</td></tr><tr><td>Particulate matter < 10 µm (PM10)</td><td>Annual</td><td>30 µg/m3</td></tr></table>
Table 4: Short term impact assessment criteria for particulate matter
<table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM10)</td><td>24 hour</td><td>50 µg/m3</td></tr></table>
Table 5: Long term impact assessment criteria for deposited dust
<table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total deposited dust level</th></tr><tr><td>Deposited dust</td><td>Annual</td><td>2g/m2/ month</td><td>4g/m2/ Month</td></tr></table>
Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS 3580.10.1-1991: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.
However, if the Proponent has a written negotiated air quality agreement with any landowner to exceed the air quality limits in Table 3, 4 and/or 5, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the air limits in Table 3, 4 and/or 5 in accordance with the negotiated air quality agreement.</td><td>There are no agreements in place with landowners to allow exceedance of the air quality limits. PKCT continues to operate a residential dust deposition network and onsite continuous particle monitors to support dust management and to inform investigations.

A review of the recent Annual Environmental Monitoring Reports and EPL Annual Returns indicates that the annual average TSP and PM10 concentrations at the northern monitoring site were reported to be below the applicable annual average criteria during the 2023 to 2025 reporting period:
The 2023–2024 AEMR reports annual averages at the northern site of 20.8 micrograms per cubic metre (µg/m³) for TSP and 14.6 µg/m³ for PM10, both below the relevant criteria; and
The 2024–2025 AEMR reports annual averages at the northern site of 23.9 µg/m³ for TSP and 16.9 micrograms per cubic metre for PM10, which also remain below their respective criteria.
The residential dust deposition monitoring reported in the AEMRs indicates compliance with the annual average criterion of 4 grams per square metre per month (g/m²/month) at the residential gauges. Short-term particulate behaviour was also examined. In the April 2023 to March 2024 period there was one day where the northern monitor recorded a 24-hour PM10 concentration above criterion of 50 µg/m³. The assessment of this exceedance attributed it primarily to a regional dust episode rather than PKCT operations.
In the April 2024 to March 2025 period there were six days where the northern monitor recorded a 24-hour PM10 exceedance and three consecutive days where 24-hour TSP concentrations exceeded the site trigger of 90 µg/m³, with the investigations concluding the exceedances were driven by regional haze and sea mists, and that the contribution from PKCT was expected to be small. The 2024–2025 AEMR further notes that on four exceedance days the estimated contribution of PKCT was minor, with the balance explained by regional dust and haze conditions.</td><td>C(obs)</td><td>It is recommended that PKCT amend the existing air quality monitoring program to either:
Supplement the existing monitoring network (e.g., the northern monitoring location) with an Australian Standard (AS) sampling method listed in NSW EPA (2022b), e.g.:
High volume air sampler (HVAS);
Tapered element oscillating microbalance (TEOM); or
Beta Attenuation Method (BAM)
Or:
Validate the performance of the existing monitoring network against an AS method with review of the acceptability of the correlation and implementation of a correction factor in the event that the accuracy of the Osiris instrumentation is acceptable.
Where implemented, the AS method should be conducted by a NATA-accredited body that has the applied method listed within its accreditation scope.</td><td>PKCT's dust Management Plan and associated Air Quality Monitoring Program was developed and approved by the Dept. following our 2009 Project Approval 08_0009. In 2020, PKCT relinquished part of our operational footprint requiring changes to the location of our monitoring equipment. In consultation with the EPA and Dept, PKCT engaged an air quality consultant to assess the existing monitoring network and determine changes required to that network. Subsequent to the review, changes to the Dust Management Plan and associated Air Quality Monitoring Program (including the current monitoring locations and Osiris monitors) were approved by the Dept. and implemented.

PKCT continues to remain compliant with our EPL and Planning Approval conditions, we assess air quality data against standards and have well developed processes that aim to reduce dust emissions thereby improving air quality, resulting in minimal dust related complaints across many years. PKCT has no plans to change from that outlined above.</td></tr>
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		A review of the AEMR identified limitations in the monitoring method applied to evaluate compliance with this Condition. Section 3 of the AEMR states: "It should also be noted that the Osiris continuous dust monitoring equipment does not comply with the NSW EPA's Approved methods for the sampling and analysis of air pollutants in NSW (NSW EPA, 2022). Consequently, the data produced by these monitors cannot provide a definitive determination of whether dust levels comply with the standards" Both AEMRs acknowledge this limitation and use the continuous data to track relative trends and to trigger investigations rather than for definitive compliance determination. In addition, neither the approval conditions, nor the EPL define a required method for real-time particulate monitoring. On the basis of the AEMR and Annual Return data for the audit period, the annual average criteria for TSP and PM10 at the northern site are expected to have been achieved and residential dust deposition criteria were not exceeded on an annual basis. Short term PM10 exceedances were investigated and attributed largely to regional conditions with a low contribution from PKCT. Noting that on this basis, the project is assessed as Compliant with the air quality impact assessment criteria at residences for the audit period.			
Sch. 4-10	The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must: (a) be developed in consultation with DECC; (b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and (c) include: • real-time sampling to monitor the dust emissions of the project; • an air quality monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this approval; and reasonable and feasible best practice emissions mitigation measures to ensure project specific assessment criteria are met.	There are no agreements in place with landowners to allow exceedance of the air quality limits. PKCT continues to operate a residential dust deposition network and onsite continuous particle monitors to support dust management and to inform investigations. A review of the recent Annual Environmental Monitoring Reports and EPL Annual Returns indicates that the annual average TSP and PM_{10} concentrations at the northern monitoring site were reported to be below the applicable annual average criteria during the 2023 to 2025 reporting period: • The 2023-2024 AEMR reports annual averages at the northern site of 20.8 micrograms per cubic metre ($\mu g/m^3$) for TSP and 14.6 $\mu g/m^3$ for PM_{10}, both below the relevant criteria; and • The 2024-2025 AEMR reports annual averages at the northern site of 23.9 $\mu g/m^3$ for TSP and 16.9 micrograms per	C(obs)	It is recommended that the protocol for evaluation of exceedances should be amended to incorporate the following: • Presentation of data for both onsite monitors and publicly available data from regional monitors including DCCEEEW Wollongong, Kembla Grange and Albion Park South (particularly relevant if concluding that an exceedance is part of a regional event). • Presentation of a time series of reported particulate matter concentrations, wind speed and wind direction for the exceedance day/s. • Qualification of limitations of the upwind/downwind	PKCT will implement the recommended changes in our future reporting.

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		cubic metre for PM_{10}, which also remain below their respective criteria. The residential dust deposition monitoring reported in the AEMRs indicates compliance with the annual average criterion of 4 grams per square metre per months (g/m^2/month) at the residential gauges. Short-term particulate behaviour was also examined. In the April 2023 to March 2024 period there was one day where the northern monitor recorded a 24-hour PM_{10}, concentration above criterion of 50 $\mu g/m^3$. The assessment of this exceedance attributed it primarily to a regional dust episode rather than PKCT operations. In the April 2024 to March 2025 period there were six days where the northern monitor recorded a 24-hour PM10 exceedance and three consecutive days where 24-hour TSP concentrations exceeded the site trigger of 90 $\mu g/m^3$, with the investigations concluding the exceedances were driven by regional haze and sea mists, and that the contribution from PKCT was expected to be small. The 2024–2025 AEMR further notes that on four exceedance days the estimated contribution of PKCT was minor, with the balance explained by regional dust and haze conditions. A review of the AEMR identified limitations in the monitoring method applied to evaluate compliance with this Condition. Section 3 of the AEMR states: *"It should also be noted that the Osiris continuous dust monitoring equipment does not comply with the NSW EPA's Approved methods for the sampling and analysis of air pollutants in NSW (NSW EPA, 2022). Consequently, the data produced by these monitors cannot provide a definitive determination of whether dust levels comply with the standards"* Both AEMRs acknowledge this limitation and use the continuous data to track relative trends and to trigger investigations rather than for definitive compliance determination. In addition, neither the approval conditions, nor the EPL define a required method for real-time particulate monitoring. On the basis of the AEMR and Annual Return data for the audit period, the annual average criteria for TSP and PM10 at the northern site are expected to have been achieved and residential dust deposition criteria were not exceeded on an annual basis.		analysis when high particulate concentrations are present during low wind conditions (e.g., <1 m/s) in which case wind patterns are expected to be non-uniform. Review of the wind vectors for which the monitor is assessed as downwind of either PKCT or BlueScope, noting that a 35° band has been used for BlueScope, whereas a 100° band would be considered more aligned with the site geometry. The band used for PKCT should also be reviewed to account for plume growth with distance downwind.	

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		Short term PM10 exceedances were investigated and attributed largely to regional conditions with a low contribution from PKCT. Noting that on this basis, the project is assessed as Compliant with the air quality impact assessment criteria at residences for the audit period.			
Driver's Code of Conduct					
No non-compliances have been identified.				n/a	
Environmental Protection Licence 1625					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	ERM observed a copy of the licence kept at the premises. PKCT's website also hosts a copy of the licence; however, the version displayed online showed an earlier licence version dated 12 July 2024, opposed to the current version dated 6 August 2025.	C(obs)	It is recommended to update the PKCT Website to include the latest version of the EPL.	Link on the PKCT website has been updated and now references the latest EPL location. Action complete.