



Kooragang Coal Terminal Annual Compliance Audit Action Plan

1 AUG 2016 – 31 JULY 2018



PORT WARATAH
COAL SERVICES

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I INTRODUCTION

I.1 PURPOSE AND SCOPE

Port Waratah Coal Services (Port Waratah) is required to undertake an independent annual environmental compliance audit for the Kooragang Coal Terminal (KCT) in accordance with Condition No. 32 of the *KCT Stage 3 Expansion Development Consent (DA 35/96)* and Condition No. 5.1c of the *KCT 120Mtpa Modified Project Approval (06_0189 MOD 3)*. The KCT compliance audit is typically completed for the period of August to July each annual period and is required for submission to the NSW Department of Planning and Environment (DPE), NSW Environment Protection Authority (EPA) and Newcastle City Council (NCC) as required by Condition No. 35 of the *KCT Stage 3 Expansion Development Consent (DA 35/96)*.

Port Waratah received correspondence from the Department of Planning & Environment (DPE), dated 3rd April 2018 advising that the previously submitted 2016/17 audit report required further information to satisfy the requirements of the above approvals and the DPE *Independent Audit Guideline (Oct 2015)*. The DPE further advised that the next audit period shall cover 1 Aug 2016 to 31 July 2018 to enable Port Waratah to address the identified issues as well as meet the audit & reporting requirements for the current year 2017/18.

Port Waratah engaged *KMH Environmental (Pitt & Sherry)* to undertake this audit and subsequent report which was submitted to the identified regulators on the 30th August 2018. The audit report included all aspects as required by the consents and the additional matters raised by the DPE in their correspondence as referenced above. The report identified 6 non-compliances and 1 observation which are included and responded to in this *KCT Compliance Audit Action Plan (The Action Plan)*.

The Action Plan has been developed in accordance with the DPE *Independent Audit Guideline (Oct 2015)*.

Table I below details the Action Plan to be progressed by Port Waratah in response to the recommendations and non-compliances identified by the compliance audit.

A summary of Audit findings and recommendations identified by KMH during the completed audit is presented as Appendix, **Table 2**.

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2 ACTION PLAN

The following action plan provides the tasks to be progressed by Port Waratah in response to the recommendations and non compliances identified by the compliance audit.

Table I – Action Plan

Audit Reference	Condition #	Recommendation	Action	Timeframe
Project Approval 06_0189 (MOD3)				
NC1 – Non Compliance	PA 2.12	<p>It is recommended that:</p> <ol style="list-style-type: none"> Each incident is reviewed with the objective of identifying improvements to water and dust control equipment, plant inspection checklists or routine maintenance actions that will minimise the potential for reoccurrence of these incidents elsewhere on the site. 	<p>All incidents reported at Port Waratah are recorded and investigated in accordance with STEPsafe Standard 53.11 (Incident Management). Corrective actions are identified to prevent re-occurrence and facilitate long term improvement.</p> <p>Each incident that occurred as referenced by the 2016/2017 and 2017/2018 Annual Returns was immediately responded to and actions undertaken as outlined below:</p> <p>These actions include:</p> <p>29/9/16; 30/1/17 and 26/10/17 – the gutter and drainage associated with the wheel wash located at the G3 gate became blocked on occasions due to vegetation and debris. Each incident was immediately responded to and the drainage system unblocked and flows returned. Improvements were progressively made to the system including the replacement of an underground drain with an open culvert to permit inspection and access for cleaning; a Preventative Maintenance (PM) action was also added to the system for scheduled inspection and cleaning. See further improvement information below.</p> <p>28/2/17 – A small leak was identified in a launder on the shiploader. Shiploading was immediately ceased and repairs made to the leaking joint identified as the cause.</p> <p>15/3/17 – Immediate response involved the isolation of the water feeding the pipework. The pipework associated with the incident was fully repaired and</p>	Complete

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Audit Reference	Condition #	Recommendation	Action	Timeframe
			<p>similar designed joints on neighbouring wharf structures were assessed and replaced where required.</p> <p>2/4/18 – the sump discharge pipework was fully replaced with new materials. The existing controls and bunding was enhanced to provide additional protection. A long term project is being investigated to risk assess and scope the potential improvement of water transfer infrastructure in identified locations.</p> <p>23/2/18 – the Return to Service procedures have been reviewed and improved to ensure that any tests carried out after maintenance activities are monitored and verified to be effective prior to return to service to avoid any reoccurrence.</p>	
		2. Investigate the feasibility of diverting overflows from the wheel wash facilities to the site water management system (to ensure any water discharges can only leave the site via the licenced discharge points).	Following the incidents that occurred in relation to the wheel wash located at our G3 gate, the arrangement and design of the system was reassessed with a number of improvements made to the system installed. This included the replacement of underground pipework with an open culvert, removal of pipework reducer couplings which were a potential blockage point, improved pipe connections, increased surveillance and preventative maintenance measures put in place. These works were completed December 2017 and we note sustained improvement in performance of the wheel wash with no reportable incidents.	Complete
NC2 - Non Compliance	PA 2.13	See recommendation for condition 2.12 above.	See response and actions above.	Complete
N/A	PA 3.1 (c)	It is recommended that the guidelines and standards referred to in this condition are referenced within the Dust Management Plan.	The guidelines and standards referred to in the condition have been referenced in the updated version of the approved Dust Management Plan (DMP) that Port Waratah is currently reviewing. Port Waratah identified prior to the audit that although the Operational Environmental Management Plan (OEMP) and associated sub plans (including the DMP) identified by the Project Approval 06_0189 MOD3, did not have any material change required, the approved version of the OEMP is approximately six years old. The OEMP was originally submitted and approved in 2012 and our view is it would be	Dec 2018

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Audit Reference	Condition #	Recommendation	Action	Timeframe
			beneficial to review, update content where required, and resubmit to DPE. This will allow Port Waratah to publish current, reviewed and approved plans on our website for interested stakeholders. It is Port Waratah's intention to resubmit the OEMP and associated sub plans to the DPE prior to the end of 2018 for re-approval.	
N/A	PA 3.1 (d)	It is recommended that Port Waratah follow up with the DPE regarding their decision on this condition.	Please refer to cover letter requesting a response from the DPE regarding any further requirements for Port Waratah to assess or install additional dust monitoring equipment.	NA
O1 - Observation	PA 7.5 (c.i)	It is recommended that a predictive water model be developed and included in the Water Management Plan, and approved by the DPE.	<p>The development of a predictive site water balance as referred to by the condition has been a focus of continual improvement by Port Waratah over several years. Port Waratah have integrated the KCT Water Balance Model with the KCT Scada system to provide predictive information to our Operations teams using forecast weather and site storage volumes and is currently in a live commissioning and training phase. Port Waratah intend to provide further detail regarding our unique approach to predictive and integrated Water Balance modelling in an updated Water Management Plan (WMP).</p> <p>As mentioned above, Port Waratah identified prior to the audit that although the Operational Environmental Management Plan (OEMP) and associated sub plans (including the WMP) identified by the Project Approval 06_0189 MOD3, did not have any material change required, the approved version of the OEMP is approximately six years old. The OEMP was originally submitted and approved in 2012 and our view is it would be beneficial to review, update content where required, resubmit to DPE and in the process, we will fully address the recommendation to Observation 1 regarding the WMP.</p> <p>It is Port Waratah's intention to resubmit the OEMP and associated sub plans to the DPE prior to the end of 2018 for re-approval and once approved publish on our website for interested stakeholders.</p>	Dec 2018

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Audit Reference	Condition #	Recommendation	Action	Timeframe
Development Consent 35/96				
N/A	DA 33	It is recommended that Port Waratah send the independent audits electronically.	All 2018 Annual Compliance Reports have been submitted to DPE, EPA and Newcastle Council via email.	Complete
Environment Protection Licence 1552				
NC3 – Non Compliance	EPL L1.1	Refer to recommendation 2.12 of the Development Consent 06_0189.	See response and actions above.	Complete
NC4 – Non Compliance	EPL O3.1	<p>There are no further recommendations:</p> <p>The dust management system implemented is a pro-active risk based system that takes into account:</p> <ul style="list-style-type: none"> • prevailing and forecast weather conditions; • coal characteristics (e.g. moisture); and • plant operator observations. <p>The key focus areas for the dust management strategy are:</p> <ul style="list-style-type: none"> • to maintain coal moisture at a sufficient level to prevent dust generation; • cessation of coal handling operations during adverse weather conditions; • continuous monitoring of dust emissions; • process (during coal handling operations) observations by supervisory personnel; and • investigation (and full reporting) of all visible dust generation from plant operations and implementation of mitigation measures. <p>During the Auditor's site inspection examples of all operations (coal receipt, stacking, reclaiming and ship loading) were observed. No visible dust was being generated by these processes at the time of the inspection.</p>	<p>As identified by the auditor comments, Port Waratah has developed and implemented an Intelligent Dust Management System (IDMS) that enables proactive and reactive response to dust generation on the site.</p> <p>Whilst an incident was reported in the 2017/2018 Annual Return, it was a minor isolated incident that did not result in material harm to the environment.</p>	NA

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Audit Reference	Condition #	Recommendation	Action	Timeframe
NC5 – Non Compliance	EPL O3.2	There are no further recommendations: refer to recommendation for O3.1 of the EPL.	See response above.	NA
NC6 – Non Compliance	EPL O7.1	It is recommended that all employees and sub-contractors responsible for ensuring vehicles or containers are clean and sealed prior to leaving the premises are provided with refresher training.	<p>Each incident that occurred as referenced by the 2016/2017 and 2017/2018 Annual Returns related to O7.1 (b) concerning the tracking of material from vehicles onto roadways. Each incident was immediately responded to and actions taken to avoid any potential reoccurrence specific to that location and incident.</p> <p>Training regarding the prevention of tracking material onto public roads is included in all site inductions. Additionally, Environmental training conducted in 2017 included reference to the EPL requirements and management of material tracking onto roadways. In addition, following the incident in 2018, refresher training regarding vehicle condition standards when leaving site was delivered to all operational employees through shift briefings and to contractors in quarterly contractor briefings. Additional signage has also been installed as a prompt to drivers before leaving site.</p>	Complete

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3 APPENDIX - SUMMARY OF AUDIT FINDINGS & RECOMMENDATIONS

The following table identifies the 6 non compliances and 1 observation that was identified by KMH Environmental during the audit.

Table 2 – Audit Results

Reference	Condition #	Condition Requirement	Audit Finding	Recommendation	Risk Level
Project Approval 06_0189 (MOD3)					
NC1 – Non Compliance	PA 2.12	Soil and Water Quality Impacts Except as may be expressly provided under the provisions of an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.	<p>The EPL prohibits discharge of water from the site other than from the licenced discharge points as stipulated in P1.2 and M2.2.</p> <p>The Annual Return for 2016/17 reported on 10 non- compliances with the EPL, with 4 of these relating to accidental discharge offsite. The incidents included:</p> <ul style="list-style-type: none"> - a vehicle wheel wash drain which had become blocked with leaves and sediment resulting in water overflowing from the wheel wash drain into a roadway gutter that drained offsite on both 29/09/16 and 30/01/17. - On 28 February 2017, during ship loading of a vessel at Kooragang Coal Terminal’s K6 Wharf, an estimated 0.5 Litres of rainwater containing coal fines entered Newcastle Harbour via a small leak in the Ship loader boom drainage launder. - On 15 March 2017, a ‘blanked off’ section of the emergency fire water system pipework at the KCT K7 Wharf, shifted at a joint under pressure resulting in an estimated 17,400 Litres of process water discharging into Newcastle Harbour. <p>The Annual Return for 2017/18 reported on 5 non-compliances with the EPL, with 3 of these relating to accidental discharge offsite. The incidents included:</p> <ul style="list-style-type: none"> - On 2 April 2018, at 5.01 Transfer House, water containing fines sprayed out of a small hole in the sump discharge line as the sump pump operated, with a portion of this water discharging offsite onto an adjacent footpath and into a public roadway drain on Heron Rd. - On 23 February 2018, at 7.10 Shiploader was being commissioned as part of the 'hand back' process following maintenance work. Upon starting the boom conveyor belt, a small amount of coal fines ran off the belt onto the wharf deck, timbers and harbour below. - On 26 October to 1 November 2017, a blockage in an underground drain caused water from the wheel wash located at KCT’s G3 Gate periodically overflowed into 	<p>It is recommended that:</p> <ol style="list-style-type: none"> 1. Each incident is reviewed with the objective of identifying improvements to water and dust control equipment, plant inspection checklists or routine maintenance actions that will minimise the potential for reoccurrence of these incidents elsewhere on the site. 2. Investigate the feasibility of diverting overflows from the wheel wash facilities to the site water management system (to ensure any water discharges can only leave the site via the licenced discharge points). 	Medium

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Reference	Condition #	Condition Requirement	Audit Finding	Recommendation	Risk Level
			the roadway gutter and after passing through several sediment controls, offsite onto Cormorant Rd. The discharges to the (off-site) stormwater system and harbour breaches the EPL.		
NC2 - Non Compliance	PA 2.13	Soil and Water Quality Impacts The Proponent shall not permit the discharge of any water from the Site to the Hunter River unless expressly provided under the provisions of an Environment Protection Licence, or when a storm event exceeds a 1 in 100 year ARI event or after prolonged wet weather 'equivalent' to this event.	Due to some of the discharge incidents (that occurred in the Annual Return 2016 and 2017) entering Newcastle Harbour as detailed in condition 2.12 above, this has been listed as a non-compliance. The water discharged was not done so via the provisions of the EPL and the discharge was not linked to a storm event.	See recommendation for condition 2.12 above.	Medium
O1 - Observation	PA 7.5 (c.i)	Water Management Plan The Proponent shall prepare and implement a Water Management Plan to outline the water management system for the Site. The Plan shall include, but not necessarily be limited to: i. predicted Site water balance including the water supply system.	The Operation Environmental Management Plan (OEMP) Rev 2 dated 4 May 2012 contains a Water Management Plan as Appendix 4 however there is no reference to a predicted site water balance for the site. Section 5 of the WMP states that "Site water balances at Port Waratah are produced each week by a contracted consultant, and are reported to Port Waratah monthly, utilising a range of meter readings and gauges". Section 3 'Surface Water Management' references Appendix 1 and 2 which includes schematics and flow diagrams of the water management infrastructure and represents the water supply system. However, there's no reference to the modelling that was undertaken to complete any predictive site water balances for the site.	It is recommended that a predictive water model be developed and included in the Water Management Plan, and approved by the DPE.	Administrative Noncompliance
Environment Protection Licence 1552					
NC3 – Non Compliance	EPL L1.1	Pollution of waters Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	The EPL prohibits discharge of water from the site other than from the licenced discharge points as stipulated in P1.2 and M2.2. The Annual Return for 2016/17 reported on 10 non compliances with the EPL, with 4 of these relating to accidental discharge offsite. The incidents included: - a vehicle wheel wash drain which had become blocked with leaves and sediment resulting in water overflowing from the wheel wash drain into a roadway gutter that drained offsite on both 29/09/16 and 30/01/17.	Refer to recommendation 2.12 of the Development Consent 06_0189.	Medium

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Reference	Condition #	Condition Requirement	Audit Finding	Recommendation	Risk Level
			<p>- On 28 February 2017, during ship loading of a vessel at Kooragang Coal Terminal's K6 Wharf, an estimated 0.5 Litres of rainwater containing coal fines entered Newcastle Harbour via a small leak in the Ship loader boom drainage launder.</p> <p>- On 15 March 2017, a 'blanked off' section of the emergency fire water system pipework at the KCT K7 Wharf, shifted at a joint under pressure resulting in an estimated 17,400 Litres of process water discharging into Newcastle Harbour.</p> <p>The Annual Return for 2017/18 reported on 5 non-compliances with the EPL, with 3 of these relating to accidental discharge offsite.</p> <p>The incidents included:</p> <p>- On 2 April 2018, at 5.01 Transfer House, water containing fines sprayed out of a small hole in the sump discharge line as the sump pump operated, with a portion of this water discharging offsite onto an adjacent footpath and into a public roadway drain on Heron Rd.</p> <p>- On 23 February 2018, at 7.10 Shiploader was being commissioned as part of the 'hand back' process following maintenance work. Upon starting the boom conveyor belt, a small amount of coal fines ran off the belt onto the wharf deck, timbers and harbour below.</p> <p>- On 26 October to 1 November 2017, a blockage in an underground drain caused water from the wheel wash located at KCT's G3 Gate periodically overflowed into the roadway gutter and after passing through several sediment controls, offsite onto Cormorant Rd.</p> <p>The discharges to the (off-site) stormwater system and harbour breaches the EPL.</p>		
NC4 – Non Compliance	EPL O3.1	Dust The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>Port Waratah implements a Dust Management Plan and actively manages air quality through the implementation of a series of proactive, automated and reactive controls such as automated stockpile sprays; sealing of traffic areas; landscaping of open areas; utilisation of a water cart on site and design features such as covered conveyer belts. These controls were observed during the site inspection. On the 24/09/2017 Port Waratah ceased operations due to weather causing dust, an incident report record of which was sighted. The RTDM also sends out a high dust warning text and email to supervisors and staff, an example of which was sighted (dated 26/07/2018). Maintenance records for dust water sprays were sighted in the Maximo system to confirm dust management controls are maintained. However, one (1) non-compliance was reported to the EPA in relation to Operating Condition O3.1 in the 2017 Annual Return.</p> <p>These included:</p>	<p>There are no further recommendations: The dust management system implemented is a pro-active risk based system that takes into account:</p> <ul style="list-style-type: none"> • prevailing and forecast weather conditions; • coal characteristics (e.g. moisture); and • plant operator observations. <p>The key focus areas for the dust management strategy are:</p>	Low

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Reference	Condition #	Condition Requirement	Audit Finding	Recommendation	Risk Level
			- On 6 January 2018, dust was generated during the ship loading of a vessel berthed at the Kooragang Coal Terminal K7 Wharf. A visible layer of coal dust was observed to have settled on parts of the deck of the vessel being loaded. Port Waratah reported that no material harm had occurred as a result of the incidents.	<ul style="list-style-type: none"> to maintain coal moisture at a sufficient level to prevent dust generation; cessation of coal handling operations during adverse weather conditions; continuous monitoring of dust emissions; process (during coal handling operations) observations by supervisory personnel; and investigation (and full reporting) of all visible dust generation from plant operations and implementation of mitigation measures. <p>During the Auditor's site inspection examples of all operations (coal receipt, stacking, reclaiming and ship loading) were observed. No visible dust was being generated by these processes at the time of the inspection.</p>	
NCS – Non Compliance	EPL O3.2	Dust All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	<p>Port Waratah implements a Dust Management Plan and actively manages air quality through the implementation of a series of proactive, automated and reactive controls such as automated stockpile sprays; sealing of traffic areas; landscaping of open areas; utilisation of a water cart on site and design features such as covered conveyor belts. These controls were observed during the site inspection.</p> <p>On the 24/09/2017 Port Waratah ceased operations due to weather causing dust, an incident report record of which was sighted. The RTDM also sends out a high dust warning text and email to supervisors and staff, an example of which was sighted (dated 26/07/2018). Maintenance records for dust water sprays were sighted in the Maximo system to confirm dust management controls are maintained.</p> <p>However, two (2) non-compliances were reported to the EPA in relation to Operating Condition O3.2 in the 2016 Annual Return.</p>	There are no further recommendations: refer to recommendation for O3.1 of the EPL.	Low

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Reference	Condition #	Condition Requirement	Audit Finding	Recommendation	Risk Level
			<p>These included:</p> <ul style="list-style-type: none"> - On 4 August 2016, an increase in dust was generated on the eastern side of the Kooragang Coal Terminal 4.29 Conveyor Drive Station. Some of this dust was observed to have settled on the grassed area outside the KCT boundary. - On 23 August 2016, an increase in dust was generated during shiploading of a vessel berthed at the Kooragang Coal Terminal K7 Wharf. A layer of coal dust was observed to have settled onto the deck of the vessel being loaded. Port Waratah reported that no material harm had occurred as a result of the incidents. 		
NC6 – Non Compliance	EPL 07.1	<p>Other operating conditions</p> <p>The licensee must ensure that activities are conducted in an environmentally satisfactory manner. So as to minimise and prevent the pollution of air and water the licensee must:</p> <p>a) Ensure that vehicles or containers prior to leaving the premises are clean and sealed in a manner that will not cause materials or wastes used in conducting the activities at the premises to be tracked, thrown from, blown, fall, or cast from any vehicle or container onto a public road.</p> <p>b) The licensee must have in place and implement procedures to ensure that vehicles and containers exiting the premises are in a condition to ensure that materials are not tracked, thrown, blown, fall or cast onto a public road.</p>	<p>The requirement to cover vehicles is included within the STEP safe Environmental Operating Procedure (Standard 46.01) as well as induction. Port Waratah assign a work supervisor to ensure activities are regulated. Port Waratah have manned security gates sighted during the site inspection as well as truck wheel wash bays at entrance points which were observed in action during the site inspection. However, three (3) non-compliance were reported to the EPA in relation to Operating Conditions 07.1 in the 2016 Annual Return and one (1) non-compliance was reported to the EPA in relation to Operating Conditions 07.1 in the 2017 Annual Return.</p> <p>These included:</p> <ul style="list-style-type: none"> - During settling pond clean out works at the Kooragang Coal Terminal Wharf in June 2016, trucks transporting material from KCTs Wharf Facilities to KCTs Terminal Facilities spilt coal onto a public road on three occasions. - On 27 August 2016, Port Waratah personnel identified that material had been tracked onto a public road from Kooragang Coal Terminal's Wharf Facilities. Investigation identified a contractor vehicle having tracked this material from site. - On 14 February 2017, a contractor's truck exiting the Kooragang Coal Terminal from the G3 Gate, tracked material from site onto Cormorant Road over a distance of approximately 300m. - On 22/03/2018, upon completion of a cleaning task at the 4.28 Conveyor Sump Area (adjacent to the Teal St overpass), a contractors Vac Truck departed onto Cormorant Rd, tracking a length of trailed mud/sediment from their tyres onto the public road. Port Waratah reported that no material harm had occurred as a result of the incidents. 	It is recommended that all employees and sub-contractors responsible for ensuring vehicles or containers are clean and sealed prior to leaving the premises are provided with refresher training.	Low

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