

1. Background

Pentarch Logistics (Pentarch) conducts log storage and export activities on land controlled by the Port Authority of NSW at William Allan Drive. The land occupied by this commercial facility is known as Lot 1 in DP 198217. It comprises approximately 8 ha of land, in two 4 ha areas known respectively as Commercial Storage Area 1 and Commercial Storage Area 2 (see Figure 1).

Surface water run-off from the operational areas has the potential to provide a pathway for contamination to reach the waters of Twofold Bay.

Pentarch holds an Environmental Protection Licence (EPL) for the export log yard (No. 20053) for the primary activity of shipping in bulk and ancillary activities including chemical storage (less than 2000 tonnes) and Wood Preservation - Not premises based (Fumigation using Methyl Bromide).

This Plan aims to meet the requirement in the Protection of the Environment Operations Act 1997 (POEO Act) to develop a Pollution Incident Response Management Plan (PIRMP).

2. Objectives

Objectives of this plan are:

- to ensure timely communication of a pollution incident to relevant authorities,
- minimise and control the risk of a pollution incident at the Pentarch site,
- ensure the plan is properly implemented,
- ensure staff are adequately trained,
- responsible persons are identified for implementing the plan, and
- ensure the plan is regularly tested.

3. Legislative Requirements

The Protection of the Environment Operations Act 1997 (POEO Act) is the main instrument that Pentarch adheres to particularly with regard to management of pollution incidents.

Part 5.7A of the POEO Act and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 indicates all details in preparing and implementing a Pollution Incident Response Management Plan (PIRMP).

4. Contact Details

Company Name	Pentarch Logistics P/L
ABN	99 075 432 254
Postal address	Level 1, 99 Coventry St, Southbank, Victoria 3006
Primary site address	William Allen Drive, Eden NSW 2551
EPL Number	20053
Company or business contact details	Name: [REDACTED] Position: Shipping & Operations Co-ordinator Business hours contact number: 02 6496 4612 Email: [REDACTED]
Company website details	www.pentarchforestry.com.au/sustainability-environment/environment/

5. Definitions

According to the POEO Act the following definitions apply:

- a) A **Pollution incident** means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.
- b) A Pollution incident that causes or threatens **material harm** to the environment must be notified.

Harm to the environment is material if:

- (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

6. Stakeholder Consultation

In the event of a significant pollution incident, neighbours will be notified. The following table provides details of immediate neighbours:

Neighbour	Contact Name	Contact Number
National Parks & Wildlife Service – Merimbula Office	[REDACTED]	0400 459 102 02 6495 5000
THALES (Navy)	[REDACTED]	0401 531 370 02 6499 7006
Forestry Corporation of NSW (Edrom Lodge)	[REDACTED]	0417 523 277
Port Authority of NSW	[REDACTED]	02 6496 1719 0438 374 034

Also Refer to Figure 1

A copy of relevant sections of this plan are available on the Pentarch Forestry website.

7. Hazard Identification & Risk Assessment

The commercial facility is intended as a cargo storage area for goods being imported or exported via Twofold Bay. Such cargo comprises commercial softwood logs and other products including pipes, construction materials and other goods that are compatible with the services provided at the commercial facility. Depending on where the softwood logs are exported, fumigation activities may be conducted on-site.

Waste streams generated, from log export activities conducted by Pentarch include:

- Office & food waste generated by staff at the facilities,
- bark from pine logs stored at the export log yard, and
- paint cans, oil and lube containers and paper tags generated in log measurement activities.

Pollution incidents could occur if:

- solid wastes (including bark) were carried off site into surrounding waters, or,
- Unlicensed stormwater discharge (e.g. flooding or dam overflow), or,
- hydrocarbons and fuel used to run and maintain plant on-site were spilt.

Stormwater run-off from highly active areas on the site could also pollute receiving waters if discharged without adequate treatment.

Supporting the wood storage & shipping activities is a limited maintenance function which involves the use of oils and some chemicals such as detergent used for cleaning purposes.

Pentarch stores for its own use significant quantities of diesel fuel that is stored in a bunded, above-ground tank. Any leak or spill associated with the supply and use of diesel fuel on site would constitute the potential for a pollution incident.

Although Pentarch does not have certification to the Environmental Management Standard ISO 14001, this standard is used to provide a framework for managing those aspects of the business which could impact on the environment. This system is the source of administrative measures aimed at preventing pollution incidents.

These include work instructions, check lists and procedures. It also requires the implementation and maintenance of items such as spill kits, water collection and treatment systems and tank bunding.

8. Inventory of Pollutants

The three main areas where potential pollutants can emanate from the site are:

- Chemical and/or hydro-carbon spillage from mobile plant,
- Accumulation of bark releasing tannins into the water, and
- Storm water run-off from the log yard (high activity).

The following potential pollutants at the export log yard include:

- 10,000 L self-bunded diesel tank, locked at all times, on a spill containment pad, containing a 1000 litre oil/water separator,
- Spray cans of paint used to mark the scaled and graded logs stored in a separate storage cage,
- 20 L drum of grease for routine small servicing of the log loaders, and,
- Various cleaning chemicals stored in the main office.

There are only very small quantities of diesel, paints and solvents stored on the wharf in a hazardous materials cupboard. These quantities are generally too low to make a significant environmental impact in most circumstances.

There are three storm water dams at the commercial facility. These are kept empty as much as possible to enable stormwater to be captured during rain events. The Port Authority of NSW who lease the land from Forestry Corporation of NSW on which the export log yard facility sits, is responsible for managing these sediment dams.

The location of the bark stockpiles changes frequently. A contractor regularly removes these stockpiles.

9. Notification of Pollution Incident Procedure

When a pollution incident occurs as per the POEO Act, each of the relevant authorities indicated below must be notified **immediately** when material harm to the environment is caused or threatened.

Key Personnel	Name	24 Hour Contact
Site Manager - Eden	[REDACTED]	0401 892 539
Shipping & Operations Co-ordinator	[REDACTED]	0428 371 679

Only the key personnel listed above are authorised to notify the relevant authorities. They will:-

- Call 000 if the incident presents an immediate threat to human health or property. The NSW Police, Ambulance Service and Fire and Rescue are the first responders responsible for controlling and containing incidents.
- Contact the Eden Ports Harbourmaster (6496 1719 or 0438 374034) if there is a spill to sea
- If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

Relevant Authority		24 Hour Contact
EPA	Environment Line	13 15 55
Bega Valley Shire	Emergencies	6499 2222
Goulburn Public Health Unit (Greater Southern Area Health Service)	Business Hours After Hours – Ask for Public Health Officer on Call	4824 1840 6080 8900
Workcover Authority	Reporting	13 10 50
Fire and Rescue NSW	Reporting	1300 729 579

- Written notification must be provided to the EPA within 7 days of the initial report.
- Information to be collated includes:
 - Time, date, duration & location of incident,
 - Location of pollution event,
 - Nature, estimated quantity and concentration of any pollutant involved,
 - Circumstances in which the incident occurred,
 - Any action or proposed action taken immediately after the event occurred.

10. Safety Equipment

There is a spill kit located at the fuel tank as well as a portable one on the maintenance trailer.

Personal protective equipment which may be required to clean up a spill is available from the Company maintenance store, e.g. rubber gloves and face mask required for cleaning up a spill.

A register of Safety Data Sheets (SDS) covering all chemicals used on site is available within a folder in the office. Chem Alert is available via the Pentarch Intranet.

11. Actions in the Event of a Pollution Incident

Refer to Figure 3 – pollution incident response flowchart and relevant response action plans in Appendix 1.

12. Monitoring

12.1 Regulatory monitoring

As part of having an EPA Licence and as per the EPA Document 'Requirements for Publishing Pollution Monitoring Data', Pentarch publishes its monitoring results on its website. Fumigation is conducted by an external contractor who provides fumigation monitoring reports at the end of each vessel loading.

Results can be found at: www.pentarchforestry.com.au/sustainability-environment/environment/

12.2 Internal Monitoring

Drains and roads throughout the log yard must be kept clean to avoid a build-up of foreign material in the drains which could potentially compromise their efficiency. These are checked by the Leading Hand fortnightly and recorded within the Rapid Auditor – Fortnightly Environmental Checklist.

There are three dams used for management of water on-site. The levels of these dams are checked regularly by the Shipping & Operations Co-ordinator to make sure they are emptied. These dams are kept empty as part of the first flush system used at the site.

13. Staff Training

In order to meet the objectives Pentarch is committed to providing relevant training to all employees. This may include, but not be limited to, first aid training, spills training.

Familiarisation of the Pentarch Emergency Procedure is achieved through site induction for new employees, visitors and contractors.

Regular refresher training in Emergency Planning is undertaken as part of the Company's ongoing training programme.

14. Testing

This Plan **must** be tested at least once every twelve months. This is done as part of Pentarch Emergency Preparedness Procedure.

If a pollution event has occurred on-site a test must be conducted within one month from the date that the incident occurred.

15. Review of Plan

This Plan must be reviewed at least once every twelve months and within one month of any pollution event.

This review will be conducted by the WHSE Co-ordinator in conjunction with the Shipping & Operations Co-ordinator.

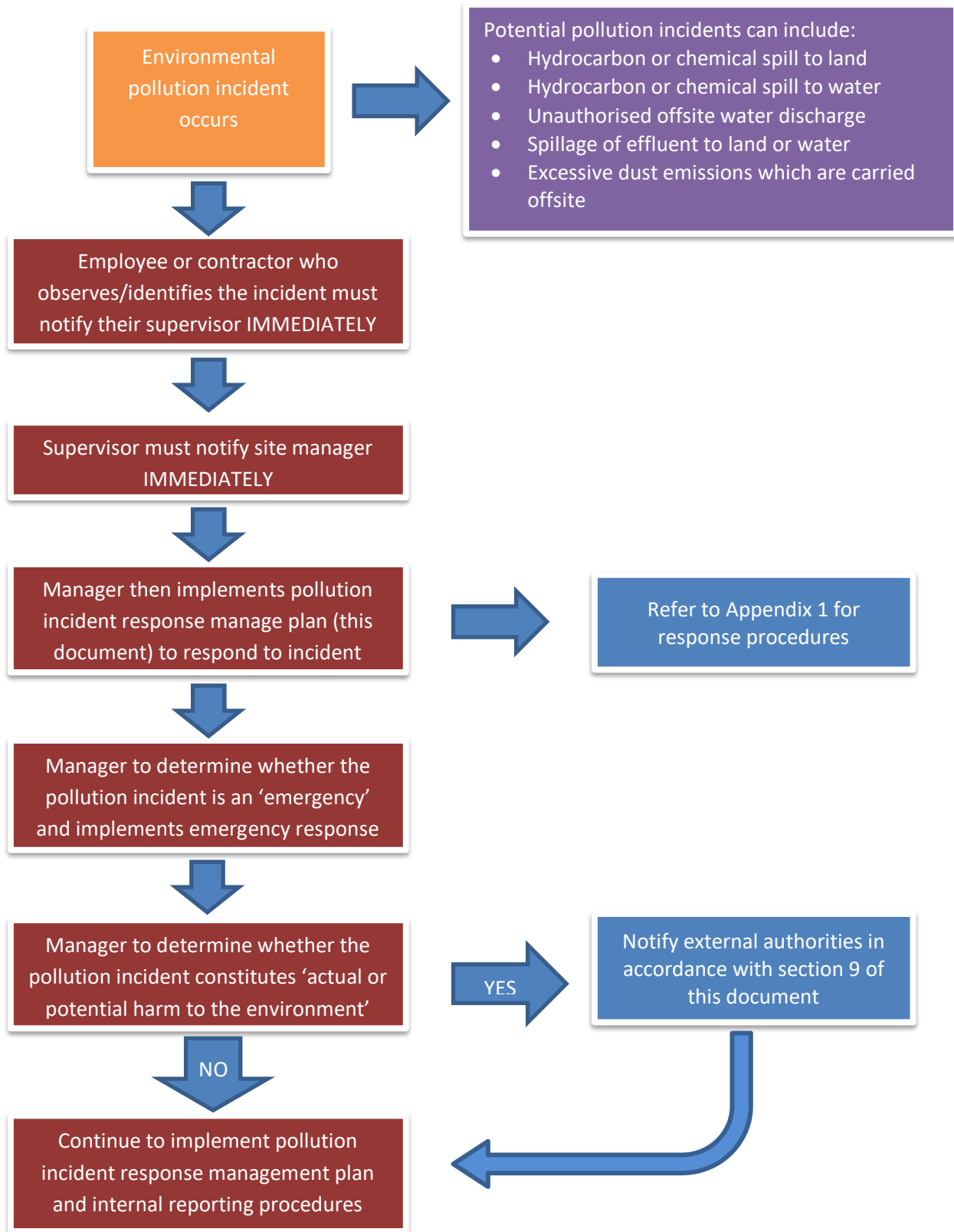
Figure 1: General Locality Map showing tenure of neighbouring land



Figure 2: Export Log Yard Water Management Components



Figure 3: Pollution Incident Response Flowchart



Appendix 1: Incident Response Action Plans

1. HYDROCARBON OR CHEMICAL SPILL TO LAND - LESS THAN 200 LITRES

- Do a quick risk assessment for human risk.
- Access nearest spill response kit.
- Block inlets to any nearby surface water drains with a physical barrier, such as:
 - Absorbent boom or sock from spill kit.
 - Mound of dirt (diesel spills)Note if spill has entered a drainage line or water body, go to point 3 below.
- Where possible and if safe to do so, isolate the source of the spill.
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.
- Conduct an assessment of potential hazards and risks.
- Ensure spill area is secured.
- Conduct an assessment of the weather conditions, considering predicted rainfall.
- Wearing appropriate personal protective equipment (see appropriate SDS for correct PPE for the spilled substance), scoop or pump as much pooled substance as possible into a container for either reuse or disposal.
- Ensure container is labelled to be containing hazardous waste.
- Upon removal of majority of the spill, apply the spill absorbent product from the spill kit onto the contaminated area.
- With a stiff bristled broom, mix the absorbent material into the spill until all the spillage is absorbed.
- Once all the hydrocarbon/chemical spill has been absorbed, immediately scoop or shovel the saturated absorbent material into a weatherproof container and label as hazardous waste.
- **DO NOT HOSE DOWN CONTAMINANTS INTO DRAINS OR WATER BODIES.**
- Contact hazardous waste disposal company to remove the waste.

2. HYDROCARBON OR CHEMICAL SPILL TO LAND - MORE THAN 200 LITRES

- Where possible and if safe to do so, isolate the source of the spill.
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.
- Do a quick risk assessment for human risk.
- If the spill has the potential to cause harm to the environment, contact NSW EPA's Environment Line on 13 15 55.
- Access nearest spill response kit.
- Block inlets to any nearby surface water drains with a physical barrier, such as:
 - Absorbent boom or sock from spill kit.
 - Mound of dirt (diesel spills).Note if a spill has entered a drainage line or water body, refer to point 3 below.
- Conduct an assessment of the weather conditions, considering predicted rainfall.
- If required contact hazardous materials disposal company for 'suck truck' etc.
- Wearing appropriate personal protective equipment (see appropriate MSDS for correct PPE for the spilled substance), scoop or pump as much pooled substance as possible into a container for either reuse or disposal.
- Ensure container is labelled to be containing hazardous waste.
- Upon removal of majority of the spill, apply the spill absorbent product from the spill kit onto the contaminated area.
- With a stiff bristled broom, mix the absorbent material into the spill until all the spillage is absorbed.

- Once all the hydrocarbon/chemical spill has been absorbed, immediately scoop or shovel the saturated absorbent material into a weatherproof container and label as hazardous waste.
- **DO NOT HOSE DOWN CONTAMINANTS INTO DRAINS OR WATER BODIES.**
- Contact hazardous waste disposal company to remove the waste.

3. HYDROCARBON OR CHEMICAL SPILL TO WATER BODY AT LOG YARD

- Immediately cease all discharge activities from the dams to prevent downstream and offsite discharge.
- Immediately cease all pumping to and from dams (isolate spill into one dam).
- Do a quick risk assessment for human risk.
- Where possible and if safe to do so, isolate the source of the spill.
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.
- If the spill has the potential to cause harm to the environment, contact NSW EPA's Environment Line on 13 15 55.
- Access nearest spill response kit/s.
- Place the floating yellow canvas boom from spill kit around the spill to prevent it from flowing out the overflow.
- Conduct an assessment of the weather conditions, considering predicted rainfall.
- If required contact hazardous materials disposal company for 'suck truck' etc.
- Concentrate the spillage into a confined area on the water dam by manoeuvring the boom. Secure the boom at both ends.
- Wearing appropriate personal protective equipment (see appropriate SDS for correct PPE for the spilled substance);
- Remove the substance from the dam by either:
 - Applying absorbent pads from the spill kit/s over the spillage, and/or,
 - Using a 'suck truck' to remove the spillage from the surface of the dam.
- If using absorbent pads in the previous step, remove the pads from the dam when saturated and place into a waterproof container and label as contaminated waste. Note that the absorbent pads may be wrung out and reused once they become saturated.
- Repeat the previous two steps until the spillage has been removed from the dam.
- Contact hazardous waste disposal company to remove the waste.

4. HYDROCARBON OR CHEMICAL SPILL TO BAY

- Do a quick risk assessment for human risk.
- Where possible and if safe to do so, isolate the source of the spill.
- Access nearest spill response kit/s.
- Place the floating yellow canvas boom from spill kit around the spill to prevent it from spreading.
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.
- Contact Eden Harbourmaster
- If the spill has the potential to cause harm to the environment, contact NSW EPA's Environment Line on 13 15 55.
- Implement NSW Maritime Twofold Bay Oil and Chemical spill contingency Plan.

5. OFFSITE DIRTY WATER DISCHARGE

- Do a quick risk assessment for human risk.
- Attempt (if safe to do so) to cease all inflow into the dam which is overflowing.
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.

- If the spill has the potential to cause harm to the environment, contact NSW EPA’s Environment Line on 13 15 55.
- Assess the need to construct a temporary bund.
- Assess viability of:
 - Pumping water from overflowing dam into one of the other two dams, and/or,
 - Discharging the water back onto the site via the sprinkler system, and/or,
 - Contacting wastewater disposal company to pump out the dam/s.
- If safe to do so, take a water sample from the discharging dam using a CLEAN container and contact ALS Environmental – Canberra: (02) 6202 5400 for analysis details.

6. FIRE

- Do a quick risk assessment for human risk.
- Attempt (if safe to do so) to control the fire using an appropriate fire extinguisher or hose and contact the local fire brigade (000).
- Notify Shipping & Operations Co-ordinator on 0428 371 679 or (02) 6496 4612.
- Assess the need to evacuate the site and follow Emergency Response Plan.