1.   Background

Pentarch Logistics P/L (Pentarch) manage a chipmill and export facility on behalf of Allied Natural Wood Exports P/L on the shores of Twofold Bay at Eden on the far south coast of NSW approximately 30km south of Eden township. It is known as Lot 1 in DP 224487 and Lots 16, 17 in DP 1066187 in the locality of Eden, Shire of Bega Valley, Parish of Kiah, County of Auckland.

The area comprises a fully developed site containing log storage area, plant, mill and water treatment, chip stockpiles and internal roads and buildings and is approximately 90 hectares (refer 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 chip mill site (No. 1482) for activities including shipping in bulk and wood processing.

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).

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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	Edrom Road, Eden NSW 2551
EPL Number	1482
Company or business contact details	Name: Hylton Scott Position: Production Manager Business hours contact number: 0264960233 Email: h.scott@pentarch.com.au
Company website details	www.pentarch.com.au

5.   Definitions

According to the POEO Act the following definitions apply:

a) A p**ollution 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:

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Neighbour	Contact Name	Contact Number
National Parks & Wildlife Service – Merimbula Office	Andrew Wall	0400 459 102 02 6495 5000
THALES (Navy)	Shane Connaughton	0429 491 702 02 6499 7006
Forestry Corporation of NSW (Edrom Lodge)	Julian Armstrong Daniel Tuan	0427 910273 0447 744428
Port Authority of NSW	Paul Webster	0438 374034 02 6496 1719

Also Refer to Figure 1

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

7. Hazard Identification & Risk Assessment

Pentarch's business activities at the export chip terminal involve receiving, storage and chipping of pulpwood logs, storage and reclaiming of woodchips and loading of these chips onto ships at its Twofold Bay loading facility. There is no direct use of chemicals in these operations.

Waste streams generated at this site includes:
- solid wood waste as a minor proportion of the logs processed, and
- wastewater and sludge from the log washing process at the chipmill site. The wastewater from the log washing operation is treated with caustic soda and alum prior to recycling.

Pollution incidents could occur if:
- solid wastes (including bark) were carried off site into surrounding waters, or,
- water from the water treatment plant not compliant with EPA licence conditions were discharged to sea, or,
- un-licenced stormwater discharge (e.g. dam overflow), or,
- if chemicals used to treat wastewater were spilt, 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 main timber processing activity is a maintenance function which involves the use of oils and a limited range of chemicals such as detergent used for cleaning purposes.

Pentarch stores for its own use and sells to its suppliers, significant quantities of diesel fuel which is stored in a number of bunded, above-ground tanks. 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 maintain 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.

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

8. Inventory of Pollutants

The four main areas where potential pollutants can emanate from the site are:
- Chemical and/or hydro-carbon spillage from mobile plant or water treatment area,
- Muddy water from chipping activities,
- Storm water run-off from the log yard (high activity), and,
- Leachate from woodchip storage.

The total volume of diesel at the chipmill site at any one time is typically 170 000 Litres, total volume of chemicals at the water treatment plant is approximately 20 000 L.

There are eight basins that collect sediment from the chipmill log yard and mill area. These are emptied on a regular basis to a disposal site within the mill boundary as per the Waste Management Plan.

Leachate from the chip stockpiles is collected in four basins and is treated through the water treatment plant and re-cycled through the system.

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
Production Manager	Hylton Scott	0467 706 519
Production Supervisor	Graeme Cantrill	0427 960 241

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 (02 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	(02) 6499 2222
Goulburn Public Health Unit (Greater Southern Area Health Service)	Business Hours After Hours Public Health Officer	4824 1840 (02) 6080 8900
WorkCover Authority	Reporting	13 10 50
Fire and Rescue NSW	Reporting	1300 729 579

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- 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

Pentarch maintains a number of spill kits around the site, notably at the maintenance workshop, store, water treatment plant, chip test office and Palmcrest fuel facility.

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 of caustic soda.

A register of Safety Data Sheets (SDS) covering all chemicals used on site is available through the maintenance store and within the document register.

11.   Actions in the Event of a Pollution Incident

a. Gatehouse personnel, in co-operation with the Production Supervisor, assess if evacuation of mill site is required,
b. If so, Evacuation Procedure commences,
c. Notify relevant authority as per Point 9 above,
d. If not, Gatehouse personnel attend, and in consultation with the Operations Manager or their representative determine appropriate action for clean-up,
e. Replace spill equipment used in process of cleaning up,
f. Complete Incident Report.

For further information refer to Figure 3 - Pollution incident response flowchart

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. Monitoring only occurs in the situation where there is a controlled discharge from the designated discharge point. Items that are monitored include the biochemical oxygen demand (BOD), dissolved oxygen (DO), pH and Total Suspended Solids (TSS).

Discharges are always controlled operations, and occur infrequently, usually no more than once every five years. If no discharge occurs no monitoring is required.

There have been no discharges in at least the last five years.

Results can be found at: http://www.pentarch.com.au/pentarch_forestry/forestry_aus/accreditations.html

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12.2   Internal Monitoring

Collection pits are monitored for any oily residues. Bunds and collection pits checked for leaks. Pumps are checked regularly to ensure they are working. The Production Supervisor is responsible for checking these at least once per week.

Drains and roads throughout the chip mill site must be kept clean to avoid a build-up of foreign material in the drains which could potentially compromise the efficient operation of the Pentarch Water Management Plan. These are also checked by the Production Supervisor weekly and recorded within the Lucidity Inform –Water Management Checklist.

There are three dams used for management of water on-site and for emergency water supply in case of an emergency. The levels of these dams are checked regularly by the gatehouse personnel as part of their regular duties.

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, fire-fighting and containment of 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 will be 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 Certification Manager

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Figure 1: General Locality Map showing tenure of neighbouring land

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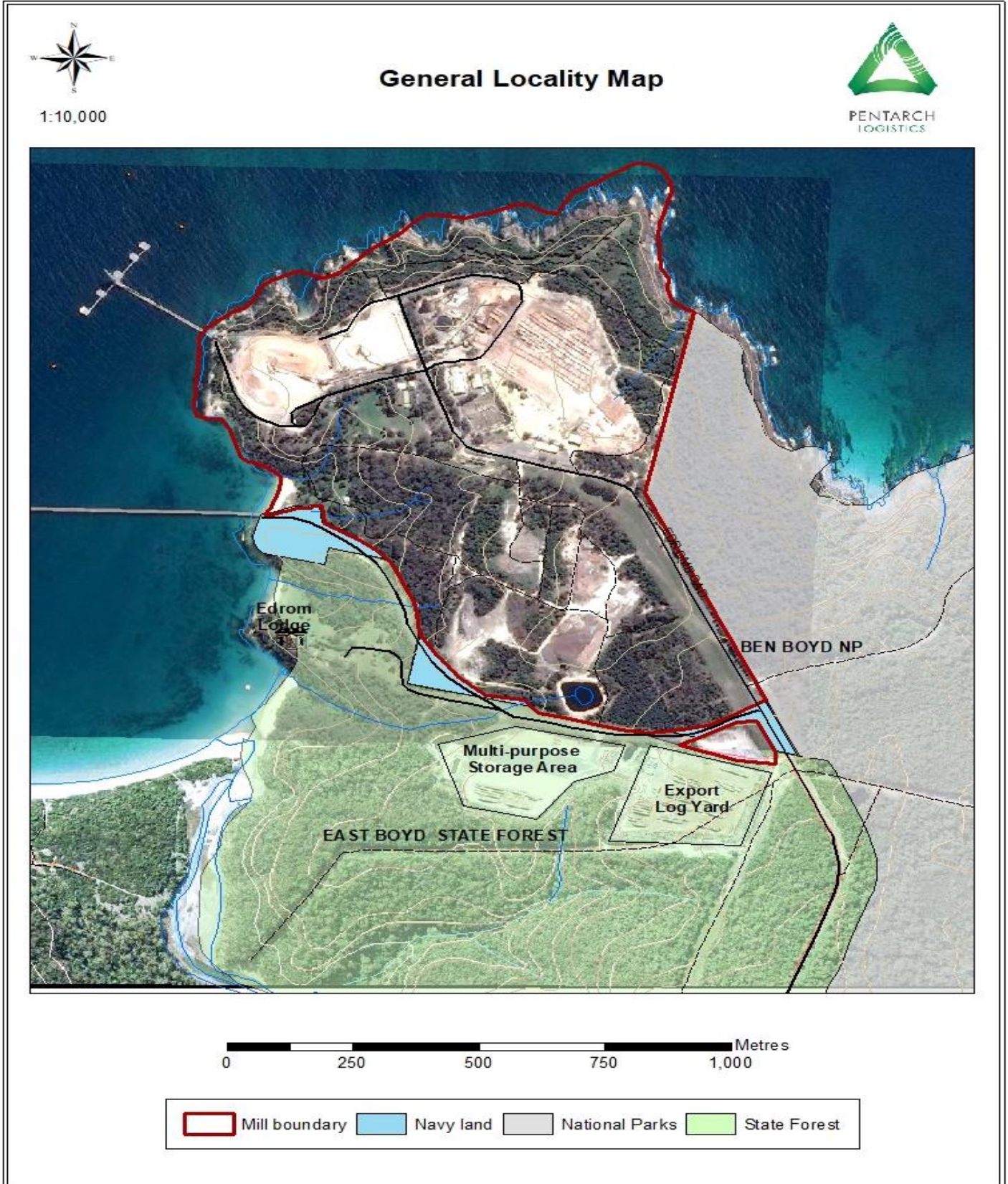Review date: 23/06/2020   Approval date: 01/07/2020   Next review date: 30/06/2023

Figure 2: Location of Potential Pollutants

Pollution Incident Response Management Plan

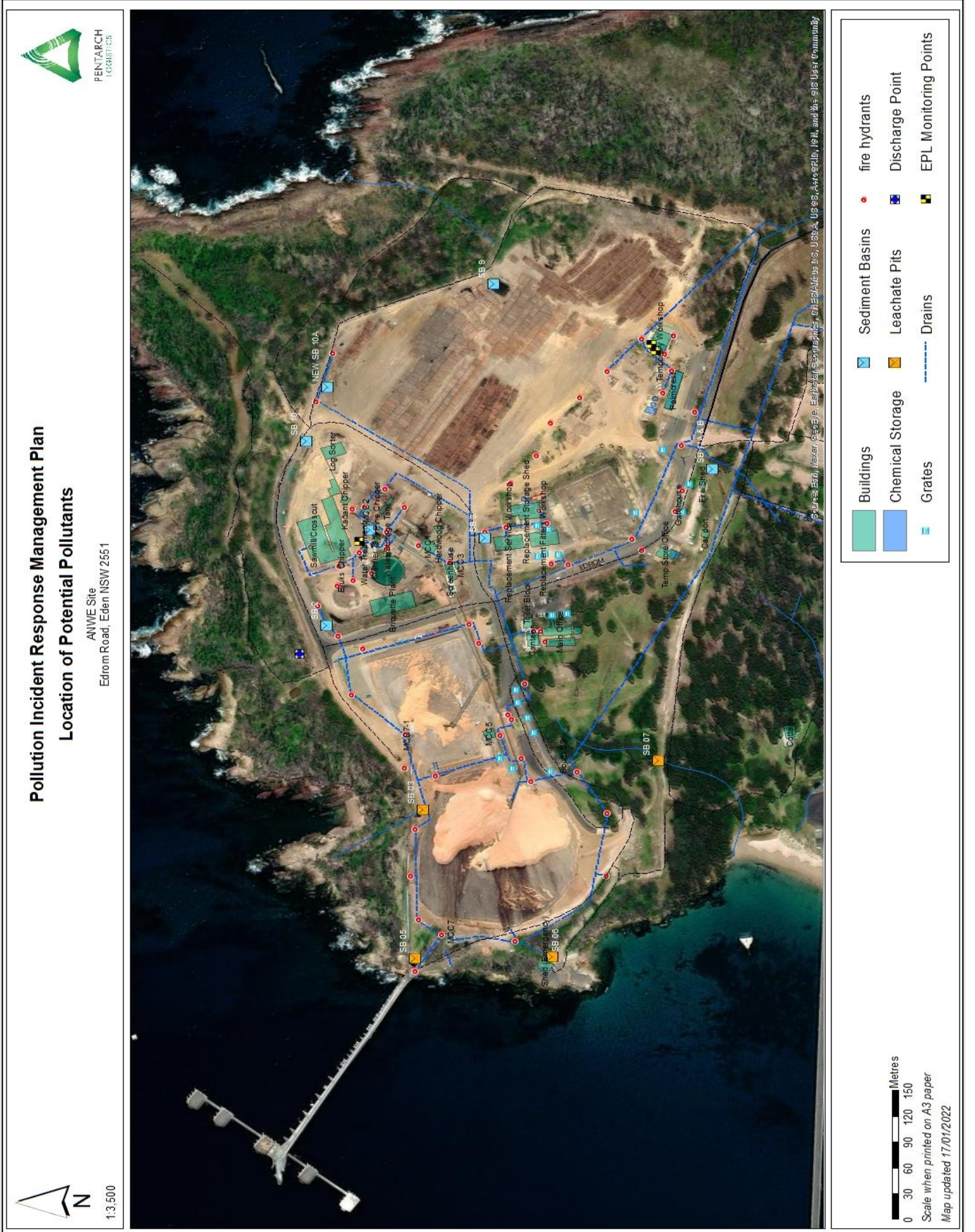Location of Potential Pollutants

ANWE Site
Edrom Road, Eden NSW 2551

Figure 3: Pollution Incident Response Flowchart

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