

## 1. Background

Australian Marshalling Services (AMS) operates 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. Surface water run-off from the operational area of the mill has the potential to provide a pathway for contamination to reach the waters of the Bay. (Refer to attached map for further information)

AMS holds an Environmental Protection Licence (EPL) No. 1482. This was transferred from South East Fibre Exports P/L on 29<sup>th</sup> February 2016

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 an pollution incident at the AMS 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 AMS 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

<b>Company Name</b>	Australian Marshalling Services (AMS)
<b>ABN</b>	99 075 432 254
<b>Postal address</b>	PO Box 189 Eden NSW 2551
<b>Primary site address</b>	Jews Head, Edrom Road, Eden NSW 2551
<b>EPL Number</b>	1482
<b>Company or business contact details</b>	Name: Erica Hansen Position: Systems & Forest Operations Administrator Business hours contact number: 0264960225 After hours contact number: Email: e.hansen@pentarch.com.au
<b>Company website details</b>	www.pentarch.com.au

## 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	Tim Sheppard	02 6495 5000
THALES	Greg Stroud	0404 033 325
Forestry Corporation of NSW (Edrom Lodge)	Julian Armstrong Daniel Tuan	0427 910273 0447 744428
Port Authority of NSW	Paul Webster	6496 1719 0438 374034

*Also Refer to Figure 1*

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

## **7. Hazard Identification & Risk Assessment**

AMS'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. However, waste streams are generated, both solid wood wastes as a minor proportion of the logs processed and waste water and sludge from the log washing process. The waste water from the log washing operation is treated with caustic soda and alum prior to recycling.

Pollution incidents could occur if:

- solid wastes were carried off site into surrounding waters,
- water from the Water Treatment Plant not compliant with EPA licence conditions were discharged to sea, or
- if chemicals used to treat waste water were spilt.

Stormwater run-off from highly active areas on the site such as the log yard 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.

AMS stores for its own use and sells to its suppliers, significant quantities of diesel fuel which is stored in a number of banded, 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.

AMS maintains accreditation to the Environmental Management Standard ISO 14001 which provides 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 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 on-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 log yard and mill area. This 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 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
Operations Manager (ECET)	Kel Henry	
Security Co-ordinator	Glenn Lane	

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

- 9.1. 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
- 9.2. Contact the Eden Ports Harbourmaster (6496 1719 or 0438 374034) if there is a spill to sea
- 9.3. 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

- 9.4. Written notification must be provided to the EPA within 7 days of the initial report

## 10. Safety Equipment

AMS maintains a number of spill kits around the site, notably at the maintenance workshop, store, water treatment plant 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. Assess if evacuation of mill site is required,
- b. If so start Evacuation Procedure,
- c. Notify relevant authority as per Point 9 above,
- d. If not, Safety, Security & Wood Quality Officers 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.

## **12. Monitoring**

AMS publishes its monitoring results on its website. It can be found at [www.pentarch.com.au](http://www.pentarch.com.au)

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

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 Co-ordinator must check these at least once per week.

Drains and roads throughout the AMS 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 AMS Water Management Plan.

## **13. Staff Training**

In order to meet the objectives AMS is committed to providing relevant training to all employees. This may include, but not be limited to, First-Aid Training, Fire-Fighting Training, Confined Space Training, Confined Space Rescue Training and Advanced Resuscitation.

Familiarisation of the AMS 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 AMS 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 Systems & Forest Operations Administrator.

Figure 1: General Locality Map showing tenure of neighbouring land

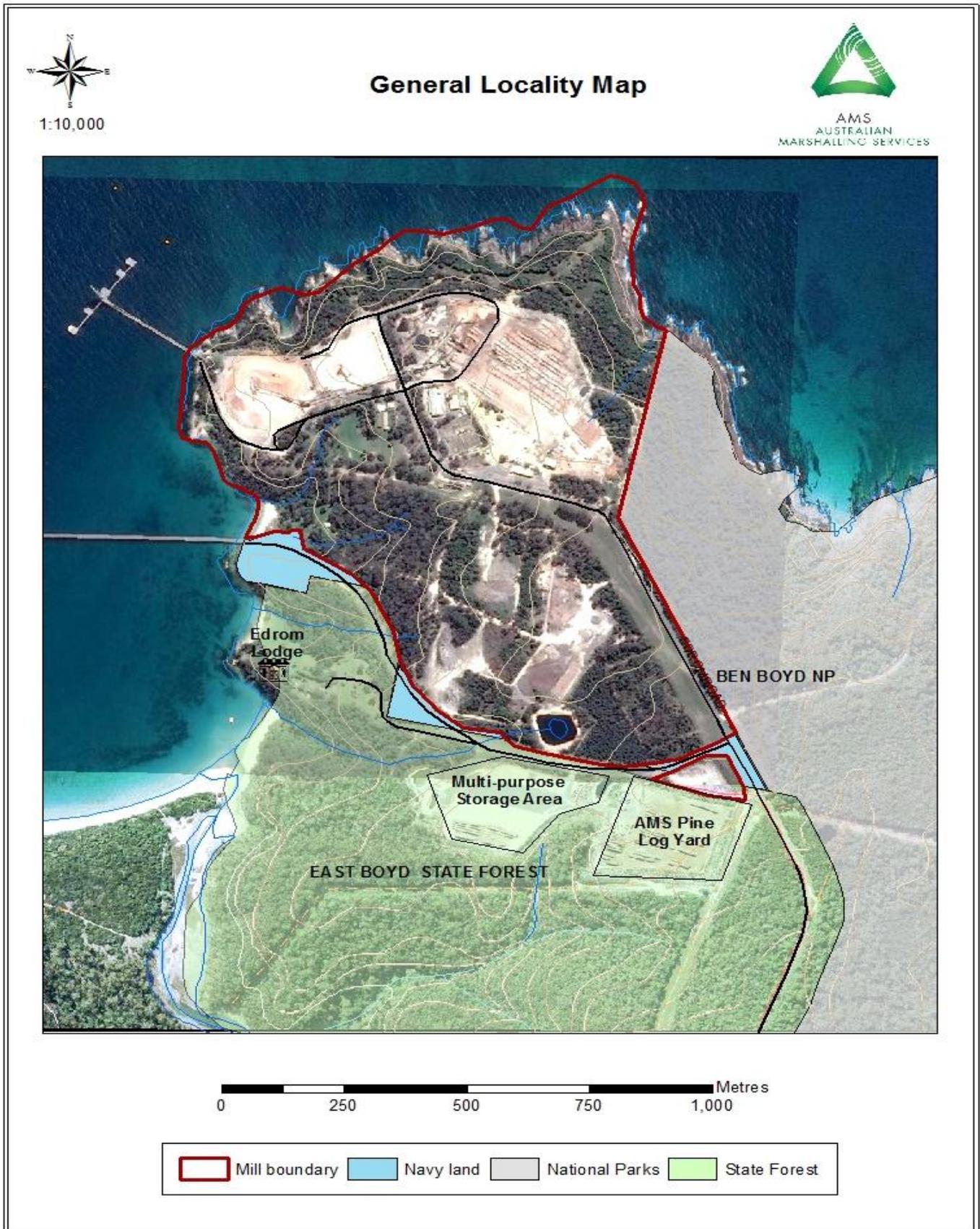


Figure 2: Location of Potential Pollutants

