



The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity is the building or use of any private or commercial facility or structure on public conservation land managed by the Department of Conservation. Examples may include lease of land to erect an information centre; authorisation to erect a weather station; or construct or lease a private/commercial campground or lodge. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

Please complete this application form, attach Form 1a or Form 1b, and any other applicable forms and information and send to permissions@doc.govt.nz. The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

If you require extra space for answering please attach and label according to the relevant section.

A. Description of Activity

Please describe the proposed activity in detail – where the site is located, please use NZTM GPS coordinates where possible, what you intend to use the building for, whether you intend to make any changes to the infrastructure.

Please include the name and status of the public conservation land, the size of the area for which you are applying and why this area has been chosen.

If necessary, attach further information including a map, a detailed site plan and drawings of proposal and label Attachment 3b:A.

The Milford Freshwater Maronestop is located at 24 Milford Sound Highway, Freshwater Basin, Milford Sound, adjacent to the Milford Sound Visitor Terminal. The site is a diesel refuelling facility for tourist vessels operating out of Freshwater Basin.

The site is located at 24 Milford Sound Highway -44.667644921261136, 167.9273540393955

B. Alternative sites considered

If your application is to **build, extend or add** to any permanent or temporary structures or facilities on public conservation land, please provide the following details:

- Could this structure or facility be reasonably located outside public conservation land? Provide details of other sites/areas considered.
- Could any potential adverse effects be significantly less (and/or different) in another conservation area or another part of the conservation area to which the application relates? Give details/reasons

C. Larger area

Is the size of the area you are applying for **larger** than the structure/facility YES / NO

If **yes**, please detail the size difference in the box below, and answer the following 3 questions, if **no** please go on to the next section:

Is this necessary for safety or security purposes? YES / NO

Is this necessary as an integral part of the activity? YES / NO

Is this essential to carrying on the activity? YES / NO

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:C.

D. Exclusive possession

Do you believe you need **exclusive possession** of the public conservation land on which your structure/building is located, ie no one else can use the land during your use of it? YES / **NO**
(Exclusive occupation requires a lease which requires public notification of the application)

If **yes**, please answer the following 3 questions, if no please go to the next section:

Is exclusive possession necessary to protect public safety? YES / **NO**

Is exclusive possession necessary to protect physical security of the activity? YES / **NO**

Is exclusive possession necessary for the competent operation of the activity? YES / **NO**

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:D.

E. Technical Specifications (for telecommunications sites only)

Frequencies on which the equipment is to operate

Power to be used (transmitter output)

Polarisation of the signal

Type of antennae

The likely portion of a 24 hour period that transmitting will occur

Heaviest period of use

F. Term

Please detail the length of the term sought (i.e. number of years or months) and why.

Note: An application for a concession for a period over 10 years must be publicly notified, an application for a concession up to 10 years will not be publicly notified unless the adverse effects of the activity are such that it is required, or if an exclusive interest in the land is required.

10 years.

G. Bulk fuel storage

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to:

<http://www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996>

Do you intend to store fuel in bulk on the land as part of the activity?

YES / NO

If you have answered yes, then please provide full details of how and where you intend to store the fuel, and label any attachments including plans, maps and/or photographs as Attachment 3b:G. If your concession application is approved you will be required to provide a copy of your HSNO compliance certification to the Department before you begin the activity.

See 3b:G Milford Freshwater Site Information.pdf

H. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 3b:H.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

Location on public conservation land	Special feature or value	Potential effects of your activity on the feature or value (positive or adverse)	Methods to remedy, mitigate or avoid any adverse effects identified
<i>EG: Tararua Forest Park</i>	<i>Northern rata - threatened species</i>	<i>Damage to the plants by construction</i>	<i>Brief construction and maintenance staff of the location and importance of the species; clearly tape off areas with the species to avoid damage</i>

I. Other

Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 3a:I.

3a-I Milford Freshwater Site Plan.pdf

3b:G Milford Freshwater Marinestop Site Information

Description

The Milford Freshwater Marinestop is located at 24 Milford Sound Highway, Freshwater Basin, Milford Sound, adjacent to the Milford Sound Visitor Terminal. The site is a diesel refuelling facility for tourist vessels operating out of Freshwater Basin.

Tank

Fuel is supplied from a 40,000-litre fibreglass double wall underground tank that is located on the foreshore in the Milford Sound Visitor Terminal staff car park.

The tank supplies the dispensers from a red jacket submersible pump with mechanical and electronic leak detectors.

The tanks have automatic tank gauging fitted and this is monitored remotely and this facilitated by a satellite link from the Milford Café Fuelstop site.

Dispensers

There are six dispensers at the site.

One is located adjacent to the tank in the visitor terminal car park to service commercial vehicles.

The remaining five dispensers are located at the end of the pontoons to facilitate vessel re-fuelling.

Only customers with an Allied Card for this facility can access fuel through the electronic fuel management system.

All dispensers have emergency shut-off buttons fitted in case of an emergency.

The nearest alternative marine refuelling facility is Deepwater Basin or Bluff.

Pipeline

All fuel lines are double contained and where they transition from the ground to the berth pontoons there is a manual shut-off valve. The fuel lines in the pontoons are manufactured from stainless steel.

There are also manual shut-off valves on the fuel lines adjacent to the dispensers on the pontoons.

Spill Containment

The fill points on the underground tank and the re-fuelling pad adjacent to the land-based dispenser are bunded and drain to a 3-stage API Interceptor. The interceptor is fitted with a manual shut off valve.

Compliance

The legal description of the property is Section 1-2 Survey Office Plan 11831 and Section 1-2 Survey Office Plan 11832. Gazette Notice 243815.

The site is a registered HAIL site (SLUS-00000099) on the Southland Contaminated Land Register.

The tank has current Stationary Container System Compliance Certificate issued in accordance with regulations 6.32 and 17.91 of the Health and Safety at Work (Hazardous Substances) Regulations 2017.

The site is covered by an Emergency Response Plan and approved Oil Transfer Site Oil Spill Contingency Plan.

Preventative Maintenance Inspections are undertaken monthly. These inspections include:

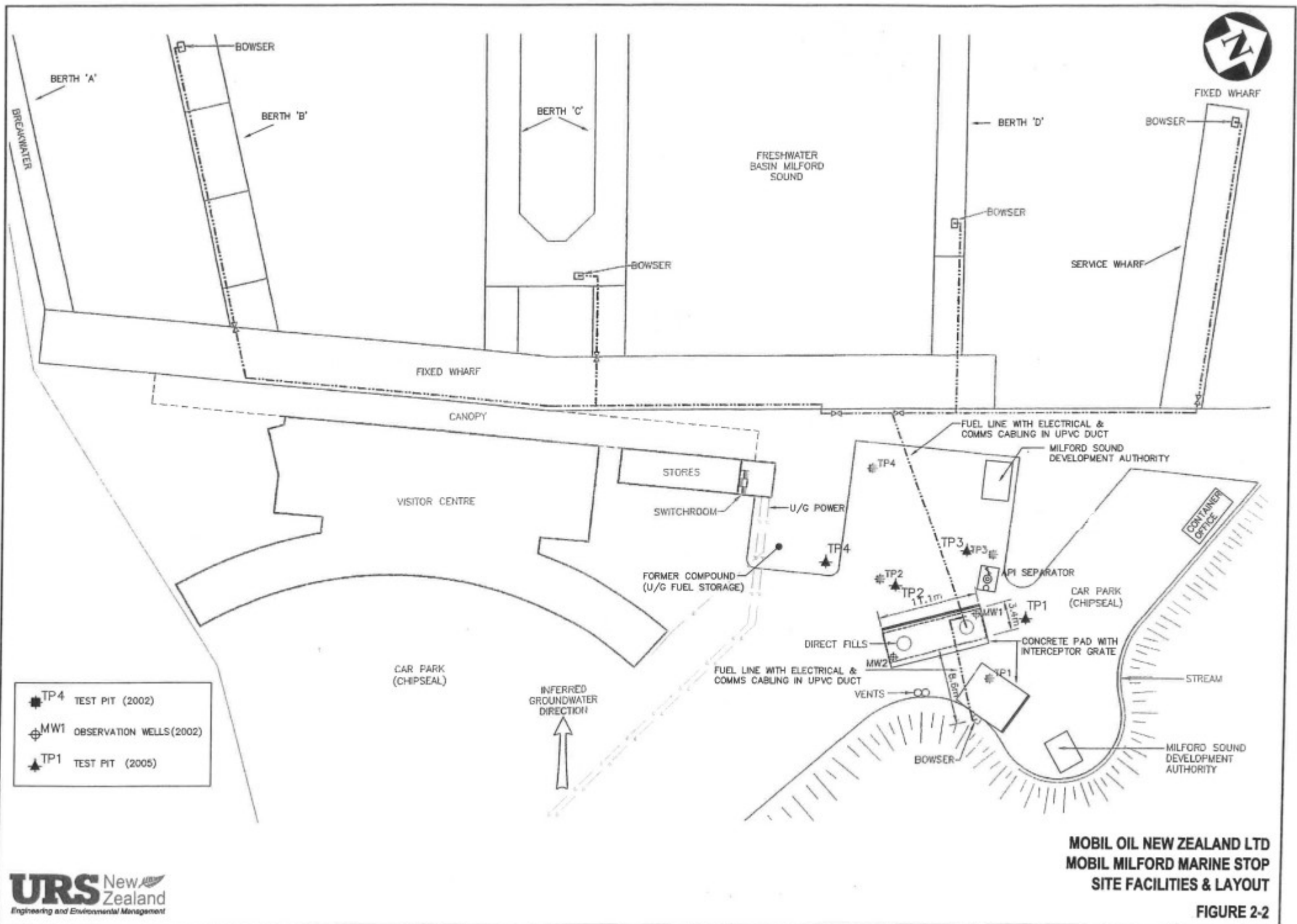
- Pumps and dispensers
- Fill/dip points and bulk storage tanks
- Drainage and oil/water separators
- Automatic tank gauges
- Payment systems




More comprehensive six-monthly checks are also undertaken that include:

- Critical safety devices
- Pumps and dispensers
- Fill/dip points and bulk storage tanks
- Automatic tank gauges
- Payment systems
- Underground or aboveground tank checks
- Vent pipes
- Drainage and sumps
- General site observations







-  TP4 TEST PIT (2002)
-  MW1 OBSERVATION WELLS(2002)
-  TP1 TEST PIT (2005)

INFERRED
GROUNDWATER
DIRECTION
↑

**MOBIL OIL NEW ZEALAND LTD
MOBIL MILFORD MARINE STOP
SITE FACILITIES & LAYOUT**

FIGURE 2-2



21 December 2022

Sean Rooney
Allied Petroleum Limited
PO Box 31201
CHRISTCHURCH 8444

Dear Sean

ENVIRONMENTAL IMPACT ASSESSMENT – ALLIED FRESHWATER BASIN MARINESTOP, MILFORD SOUND

1.0 Introduction

PDP have been commissioned by Allied Petroleum Limited (APL) to prepare an environmental impact assessment (EIA) for their marine refuelling facility located at Freshwater Basin Visitor Terminal and berthing pontoons, Milford Sound. The EIA has been prepared to support the concession application with the Department of Conservation (DoC) for the operation of the existing facility. The facility is considered a 'High Impact Activity' by DoC.

The EIA outlines the following:

- A description of the activity including details of the existing facility, its operation, monitoring programme and safety features;
- A description of the environment the facility is located; and
- An assessment of environmental effects associated with the operation of the facility; in the event of a spill or natural disaster that compromises the integrity of the system, and the mitigation measures in place to avoid, remedy or mitigate an adverse effect.

2.0 Description of Activity

The marinestop is an active self-serve (unmanned) diesel refuelling facility located at 24 Milford Sound Highway, Milford Sound. The marinestop operates in a general commercial area and used to supply diesel for tourist vessels operating out of Freshwater Basin. The facility is critical for the commercial businesses that operate from this wharf. This is the only commercial refuelling facility at the wharf.

The facility consists of an underground storage tank (UST), which supplies six dispensers. One dispenser is located adjacent to the UST in the visitor terminal car park to refuel commercial vehicles. The remaining five dispensers are located at the end of the berthing pontoons to facilitate vessel re-fuelling. The approximate co-ordinates of the UST is 44°40'3.85"S 167°55'38.56"E.

The ground surface in the vicinity of the UST and the single dispenser on land where any fuel handling takes place comprises concrete. The wider surrounding area is surfaced with asphalt. The surface of the fuel handling areas is graded so stormwater is directed to ACO drains and sumps before being directed to a 3-

stage API Interceptor. The discharge point from the interceptor is into Freshwater Basin. Stormwater runoff from the surrounding staff carpark area to the north of the UST is directed by site contours to the east towards a stream at the base of a cliff face. This stream also discharges into Freshwater Basin.

Refer to Figure 1 for the facility layout and attached photographs.

2.1 Tank

The UST comprises a single 40,000 L double wall fibreglass tank with direct fill point. Two monitoring wells were installed within the tank pit during the installation of the UST (refer Figure 1) to allow for monitoring of the subsurface conditions.

Fuel is pumped from the UST to the dispensers using a red jacket submersible pumps with mechanical and electronic leak detectors. The pump is only activated after a swipe card has been used at the terminal and nozzle activated. When not in use the pipeline is not under pressure thus preventing accidental spillage greater than the contents of the pipeline.

There is also a solenoid valve at the tank which only opens after activation of the swipe card and prevents product siphoning from the pipeline or dispenser.

The tanks have automatic tank gauging fitted and this is monitored remotely for any discrepancy in reconciliation.

There is a clearly labelled Emergency Stop button adjacent to the forecourt (see photos) in case of an emergency.

2.2 Dispensers

There are five dispensers located on the berthing pontoons for refuelling of vessels. These comprise Compac Marine Dispensers with a filtered hose reel and an automatic shutoff nozzle (i.e. requires the refuelling person to grip the nozzle open otherwise fuel will not flow).

There is an additional Compac Dispenser on land in the vicinity of the UST. This dispenser is used to refuel service commercial vehicles. Refuelling takes place on the concrete pad with a collection sump.

The dispensers are fitted with an Everlink card-based fuel management system. Only customers with an Allied Card for this facility can access fuel.

All of the dispensers have emergency shut-off buttons fitted in case of an emergency.

2.3 Pipeline

The underground section of pipework comprises double wall (i.e. secondary contained) Universal Petro Pipe (UPP) and where they transition from the ground to the berth pontoons there is a manual shut-off valve. The pipework between the transition box and the dispensers on the berthing pontoons are manufactured from stainless-steel pipe (single skin). Manual shut-off valves are present on the pipeline adjacent to each of the dispensers on the pontoons.

2.4 Spill Containment

The land dispenser and tank slab are surfaced with concrete. Any above ground spillage/leak during filling of the UST or refuelling from the dispenser is directed via surface contouring to ACO drains and sumps and passed through a 3-stage API Interceptor. The interceptor has an operational fuel containment capacity of 2,500 L (i.e. will contain 2,500 L of fuel whilst still allowing stormwater to pass through) and a manual shut off valve which can be activated to shut the entire stormwater system down.

The underground section of pipework is double wall UPP. This means that any leak of the inner pipeline is captured within the secondary containment system. Unless a breach of the secondary containment occurs, there would be no discharge to the environment from the underground section of pipework.

2.5 Compliance and Inspections

The tank has a current Location Compliance Certificate and Stationary Container System Compliance Certificate (expires August 2023) issued in accordance with regulations 6.32 and 17.91 of the Health and Safety at Work (Hazardous Substances) Regulations 2017.

The site is covered by an Emergency Response Plan and approved Marine Oil Transfer Site Oil Spill Contingency Plan. A copy of this is included with the application.

Preventative Maintenance Inspections are undertaken monthly. These include inspection of the:

- ✧ Pumps and dispensers
- ✧ Fill/dip points and bulk storage tanks
- ✧ Drainage and oil/water separators
- ✧ Automatic tank gauges
- ✧ Payment systems

More comprehensive six-monthly checks are also undertaken that include inspection of the:

- ✧ Critical safety devices
- ✧ Pumps and dispensers
- ✧ Fill/dip points
- ✧ Automatic tank gauges
- ✧ Payment systems
- ✧ Aboveground tank checks
- ✧ Vent pipes
- ✧ Drainage and sumps
- ✧ General site observations

3.0 Description of the Environment

The site is located within the Fiordland National Park. The marinestop is located right at the end of Milford Sound Highway at Freshwater Basin approximately 500 m north of the settlement of Milford Sound, Southland. The area is located within land parcel Section 1-2 Survey Office Plan 11831 and Section 1-2 Survey Office Plan 11832. Gazette Notice 243815 and is zoned as National Park under the Southland District Plan.

The marinestop operates in a general commercial area for the local tourism industry and associated commercial vehicles and vessels. The area is classified as a highly disturbed area. Infrastructure in the immediate area of the facility include the Milford Sound Visitor Terminal, associated vessel berthing pontoons and other smaller buildings including the Milford Development Authority Building.

The closest surface water body to the UST (and land dispenser) is a small stream located at the base of the steep cliff face immediately to the east behind the Milford Development Authority Building. This stream discharges into Freshwater Basin.

The closest area of natural bush is located approximately 2 m behind the land dispenser. This forms parts of a steep vegetated cliff face (with a small stream at its base).

The UST is located approximately 25 m from Freshwater Basin, with the berthing pontoons (and 5 dispensers) extending directly over Freshwater Basin. Freshwater Basin is part of the upper reaches of Milford Sound, which is considered to be an ecologically sensitive surface water body due to the presence of ecologically sensitive aquatic flora and fauna which is internationally renowned.

The refuelling facility is located in a highly disturbed and commercial part of the Milford Sound Tourist area and therefore there is unlikely to be highly sensitive terrestrial fauna and flora in the immediate vicinity of the facility. However, given the properties of diesel and the facility's proximity to surface water, Freshwater Basin, and Milford Sound, are considered sensitive receptors and could be adversely impacted as a result of a fuel leak/spill event.

4.0 Assessment of Effects

An environmental impact assessment has been undertaken to understand the environmental effects associated with a spill/leak event and the mitigation measures in place to avoid, remedy or mitigate an adverse effect occurring.

The assessment has been based on operational spillage or a spill or leak event occurring as opposed to the effects from customers using the facility (i.e. boats and vehicles) as the facility is located in a recognised commercial area. The discharge of diesel into the environment is considered the primary driver to any adverse effect occurring and has been the focus of this assessment.

The following table provides a summary of the possible spill/leak scenarios, how the contaminants would enter the environment and measures to avoid, remedy or mitigate the effects.

Table 1: Assessment of Effects and Mitigation Measures		
Values	Spill/Leak Scenario & Potential Adverse Effects	Mitigation Measures
<p>Terrestrial (Land) Values</p>	<ul style="list-style-type: none"> ∴ Spillages during refilling UST by road tankers ∴ Operational spillage by customers (to land) ∴ Equipment failure/rupture to land (includes natural disasters including earthquakes and floods) <p>The above scenarios could result in diesel being spilt or discharged to ground. In general, with the mitigation measures in place, the volume of any spilt/leaked diesel would typically be captured in the secondary containment devices and 3-stage API interceptor.</p> <p>In the unlikely event that a breach of the secondary containment occurs, or diesel is spilt outside of the stormwater catchment area, diesel would enter the ground. Minor spillages of diesel would bind to the surface/shallow soil and have no effect to any natural features such as native vegetation and wildlife as there are none present on site. There is also considered to be no risk to the current commercial operations in the wider site from any minor spillage (i.e. human health via direct contact or inhalation exposure pathways).</p>	<p>Operational drips and minor spillages during filling of the UST or during refuelling are possible and likely, but the volume of spillage is typically minor and would be captured on the concrete refuelling pad. Stormwater from this area is directed to ACO drains and sumps and passed through a 3-stage API Interceptor before discharging into Freshwater Basin. The interceptor provides containment of any spilt diesel and through regular maintenance is removed from site.</p> <p>A Site Emergency Response Plan and the Tier 1 Oil Spill Response Plan have been prepared for the facility and are included with the application. These documents outline the emergency responses associated with a disaster or spill/leak event. This includes contact details and a response process with regional and local councils, civil defence and the police (depending on the event). The Marine Oil Spill Contingency Plan has been approved by Maritime New Zealand.</p> <p>The likelihood of a leak in the fuel system is very low, and the likelihood of a leak entering the environment even lower as a result of a number of mitigation measures.</p> <p>Secondary containment - The UST is double walled fibreglass and underground section of pipework double walled UPP. This means that any leak of these components is captured within the secondary containment system. Unless a breach of the secondary containment occurs, there would be no discharge to the environment.</p> <p>Reconciliation - The tank has an automated and remotely monitored tank gauges continually reconciling the volume in the tanks against the volume of fuel dispensed. Any discrepancy triggers and alert to investigate the cause. The automated monitoring system means that any leak from the fuel system can be investigated, and actions initiated to quickly, minimising any environmental effect.</p>

Larger spill/leak events would infiltrate shallow soils and migrate vertically through the soil column to the water table where it would move in the direction of groundwater flow. If a sufficiently large spill/leak was to occur, there is the potential it could reach Freshwater Basin/Milford Sound via the groundwater migration pathway and presents as a risk to the sensitive ecological receptors present.

If diesel migrated beneath any existing nearby buildings, a potential risk to site workers via the indoor inhalation exposure pathway may exist (although a low risk with diesel). This would need to be assessed as part of the investigation and remedial works triggered as a result of a significant spill/leak event.

The mitigation measures will not only reduce the potential for a large spills/leaks to occur, but if one did occur, it would be identified quickly and remedial works initiated to minimise any environmental or human health effect. This is a significant change to the fuel systems that operated in the past without the automated monitoring systems, where they would continue to operate and leaks could remain undetected for long periods of time. This not only increased the volume of fuel released into the environment, but also allowed fuel to migrate further from the leak point in the subsurface environment, often undetected until it reached a receptor triggering a response.

Shutoff nozzles – The dispensers on the berthing pontoons have auto shutoff nozzles that require a person to physically hold down the trigger to operate and is therefore present at all times when filling is occurring. This eliminates a person leaving a nozzle unattended and overfilling a tank. Only Allied card holders can use the system.

Pump activation – The pumps to dispense fuel will only operate when the swipe card system has been activated. This means in the event of a line rupture or damage to the system (i.e. damage to the wharf or vandalism of the dispenser), the pump will not automatically switch on to keep the line pressurised. The volume of fuel in the line is the maximum that could be lost to the environment.

Training – The road tanker drivers delivering fuel to the facility are highly trained and experienced. This will reduce the risk of any spillage during the transfer process.

Testing and inspections – Renewal of the stationary container system compliance certificates, and any required testing for that renewal process, will be completed every 5 years (in accordance with Worksafe Regulations). Monthly preventative maintenance inspections are undertaken and more comprehensive inspections undertaken 6-monthly to monitor the condition of the facility and requirement of any maintenance.

In the event of a natural disaster, the level of damage to the facility will depend on the severity and nature of the event. However, the measures outlined above will provide a degree of mitigation to the release of diesel into the environment. The facility will be inspected as soon as possible following a natural disaster event to confirm the facilities integrity.

<p>Aquatic and Marine Values</p>	<ul style="list-style-type: none"> ⋆ Operational spillage by customers directly into Freshwater Basin (pontoon dispensers) ⋆ Overland flow into Freshwater Basin (large spill events or stormwater runoff) ⋆ Subsurface migration of contaminants with groundwater flow into Freshwater Basin (associated with ground contamination) ⋆ Equipment failure/rupture/damage (pipework/valves on pontoons) <p>The above scenarios could result in diesel being spilt or discharged directly into a surface water body or migrating via groundwater or overland flow to a surface water body. Any drips/minor spills from the pontoon dispensers have the potential to result in a visual impact on the water surface. Given the large water body and dilution effect, occasional drips during refuelling would have a negligible impact to the overall water quality and aquatic ecosystems on the wider area. Visually however, it would be quite apparent (sheening on the water surface) and would trigger a response to investigate the cause and clean up. As such, mitigation measures to minimise drips and minor spills have been adopted to reduce any impacts on the ecologically recognised and sensitive environment.</p> <p>Larger spill/leak events have the potential to result in a significant adverse impact to Freshwater Basin/Milford Sound and would present as a risk to the sensitive ecological receptors present. This is recognised by Allied.</p>	<p>Operational drips and minor spillages during dispensing are possible and likely, but the volume of spillage is typically minor. Any spillage (unless retained in the vessel) could directly enter Freshwater Basin. Mitigation measures to minimise any impact to Freshwater Basin during refuelling activities are as follows:</p> <p>Spill Kit – A spill kit is present on site and a spill response plan has been prepared in the event of a spill. The spill response plan includes details of when Environment Southland is to be contacted for larger spill events.</p> <p>Shutoff nozzles – The pontoon dispensers have auto shutoff nozzles that require a person to physically hold down the trigger to operate and is therefore present at all times when filling is occurring. This eliminates a person leaving a nozzle unattended and overfilling a tank. Only Allied card holders can use the system.</p> <p>Pump activation – The pumps to dispense fuel will only operate when the swipe card system has been activated. This means in the event of a line rupture or damage to the system (i.e. damage to the wharf or vandalism of the dispenser), the pump will not automatically switch on to keep the line pressurised. The volume of fuel in the line is the maximum that could be lost to the environment.</p> <p>The likelihood of a leak entering the ground and being of sufficient volume to migrate to Freshwater Basin is low as a result of the majority of the system being secondary contained and tank gauging/reconciliation monitoring. The mitigation measures will not only reduce the potential for a large spill/leak to occur, but would be identified quickly meaning that it would be able to be investigated and remediated minimising the potential for contaminants to reach Freshwater Basin.</p> <p>In the event of a natural disaster, the level of damage to the facility will depend on the severity and nature of the event. However, the measures outlined above will provide a degree of mitigation to the release of diesel into the environment. In particular, the pump activation requirement will mean if the dispenser or stainless-steel pipework section is damaged, only the volume of the pipework will be released. Emergency response practices and spill containment would then be actioned to minimise the impact to the environment.</p>
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5.0 Summary

An environmental impact assessment for the Freshwater Basin Marinestop has identified that the facility is a 'high impact area' defined by DoC.

The facility is located in a highly active commercial area so the impact to the environment associated with the physical presence and activity of people using the facility (i.e. commercial vehicles and boats) is not considered to have an increased level of impact to the environment in that area of Milford Sound. However, the storage, dispensing and potential for a diesel leak/spill event has the potential to cause an adverse effect on the environment, and is recognised by Allied.

Operational drips and minor spillages during routine dispensing operations are possible and likely, however, the volume is typically minor and would be captured by the site infrastructure and passed through an interceptor before discharge to Freshwater Basin. There are also mitigation/response measures in place to minimise any spillage during refuelling of boats from the berthing pontoons directly on Freshwater Basin. The UST and underground sections of pipework are all double contained so the likelihood of a leak entering the environment is very low. In the unlikely event that a leak occurs that breaches the secondary containment, remote monitoring of the system will trigger an emergency response to investigate, and if required, remediation of the area.

The mitigation measures that Allied have installed/initiated at the site, coupled with the 3-monthly, 6-monthly inspections, reduce the potential for an adverse effect to occur for the operational refuelling facility.

6.0 Limitations

This report has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by Nelson Petroleum Distributors Limited (NPD) and publicly available information. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the report. PDP accepts no responsibility for errors or omissions in, or the currency or sufficiency of, the provided information.

This report has been prepared by PDP on the specific instructions of NPD for the limited purposes described in the report. PDP accepts no liability if the report is used for a different purpose or if it is used or relied on by any other person. Any such use or reliance will be solely at their own risk.

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Yours faithfully

PATTLE DELAMORE PARTNERS LIMITED

Prepared by



Scott Wilson

Technical Director – Contaminated Land

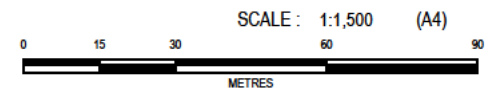


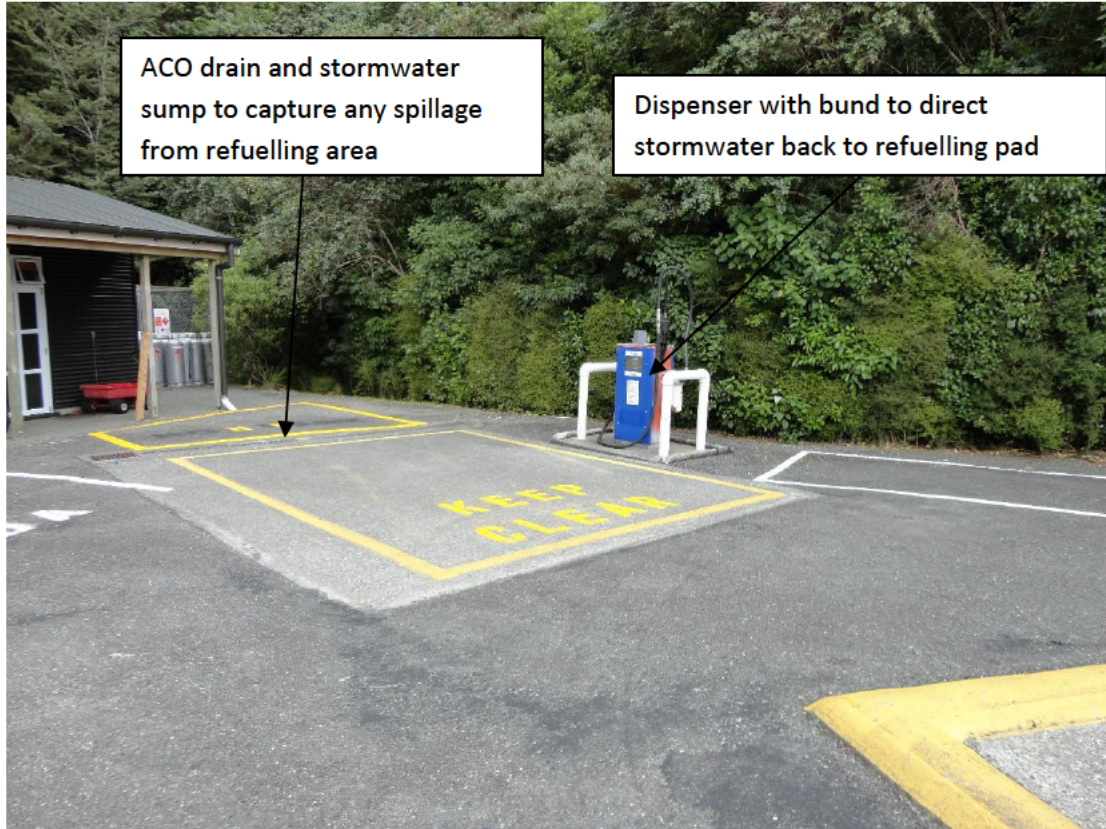
Key

- UST
- ★ DISPENSER
- FUEL LINE

SOURCE:
1. AERIAL IMAGERY (FLOWN 2016-2019) SOURCED FROM THE LINZ DATA SERVICE AND LICENCED FOR RE-USE UNDER THE CREATIVE COMMONS ATTRIBUTION 4.0 INTERNATIONAL LICENCE.

FIGURE 1 : SITE PLAN





Photograph 1: Photo showing the land dispenser and concrete refuelling area



Photograph 2: Photo showing tank slab



Photograph 3: Photo showing one of the dispensers located at the end of the pontoons