Letter

Environmental Protection Act 1994

Finalisation of an Environmental Enforcement Order

Pursuant to section 362

Liquid Terminals Australia Pty Ltd [ACN 001 849 805]

Level 34, 360 Elizabeth Street

MELBOURNE VIC 3000

Your reference: STAT-E-100718443

Our reference: C-CPLPO-100675230

TAKE NOTICE: that on Monday, 7 April 2025 (amended on 2 July 2025, 1 October 2025 and 2 October 2025) under the *Environmental Protection Act 1994* (the Act) the administering authority issued an environmental enforcement order (EEO) to Liquid Terminals Australia Pty Ltd [ACN 001 849 805]. The administering authority is the Chief Executive of the Department of the Environment, Tourism, Science and Innovation (the department).

The EEO was issued in respect to the activities of Liquid Terminals Australia Pty Ltd (ACN 001 849 805) on land described as Lot 1102 Plan SL10945 and Lot 1160 Plan SL10945 at 200 Tingira Street and 4 Yarra Street, Pinkenba QLD 4008 (the premises).

A. Requirements

The requirements of this EEO (in summary form) were:

1. By 5pm on 5 May 2025 you must engage the following to carry out the requirements of this EEO:
   a. Suitably qualified person/s (SQP) for requirements 2, 3, 4, 9, 5-8 (where triggered)
   b. Appropriately qualified person (AQP) for requirement 10 and under requirement 11E.
2. By 5 May 2025 and ongoing until four rounds obtained you must ensure a SQP monitors the quality of water at each of the monitoring locations, as per Table 1 of the EEO.
3. By 5pm on 27 February 2026, you must ensure the SQP completes investigations and reports on PFAS levels in stormwater released from the premises (directly and indirectly) to the environment, including identification of all stormwater release points from the premises; and develops and implements a stormwater monitoring plan to determine per- and polyfluoroalkyl substances (PFAS) levels at all stormwater release point(s).
4. Stage 2 stormwater contaminant source investigations in requirements 5 – 8 below, are only enlivened in the circumstance that any of the stormwater monitoring results (including TOP Assay) exceed “PFAS contaminated stormwater” levels (see definition Appendix A in the EEO).
5. By 5pm on 27 March 2026 you must ensure the SQP develops a sampling and analysis plan (SAQP) to investigate potential PFAS sources in stormwater identified in Stage 1 stormwater contaminant sampling and seeks feedback from the department on the SAQP.

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6. The SAQP must consider the following investigation approaches (where relevant): in a – c of the EEO.
7. You must ensure the SQP reviews the relevant site procedures for stormwater management and avoidance of stormwater contamination, including management of stormwater in bund(s) unloading areas, records about fire foam system tests, or any spills and spill management associated fire foam storage and distribution system; the interceptor(s) and the sampling investigation results to prioritise stormwater catchments / site infrastructure risks.
8. By 5pm on 30 June 2026 you must ensure the SQP provides a report on the stage 2 investigations and provide recommendations on reasonably practicable measures to prevent and / or minimise PFAS releases via stormwater from the premises (and indirect releases to groundwater).
9. By 5pm on 5 June 2026, you must ensure the SQP carries out groundwater monitoring reporting and contaminants pathways to the environment in accord with requirements: a -d of the EEO.
10. By 5pm on 5 November 2025 you must ensure an AQP carries out an audit of the fire foam storage and distribution system against requirements of the Act, including compliance with Firefighting Foam policy. The audit must include but not be limited to items in 10 a – d of the EEO.
11. You must submit the following notifications and reports by the dates against each requirement in Table 2 of the EEO.
12. Investigations and reporting must be in accordance with relevant legislation and guidelines in 12 a - g of the EEO.
13. PFAS analysis must be undertaken using paired standard analysis and TOP Assay.
14. All determinations of the quality of contaminants released must be performed by a person possessing appropriate experience and qualifications to perform the required measurements.
15. For environmental samples (for example tidal drains and groundwater), analytical data on all media must include PFAS analyses for the suite of 28 standard fluorinated organic compounds by liquid - chromatography – mass spectrometry (LC/MS/MS [super trace level]);
16. To assess the presence of precursors in media and allow comparison with standard assessment techniques, the following must be included in the assessment with analysis being undertaken TOP Assay followed by liquid -chromatography – mass spectrometry (LC/MS/MS [trace level]).
17. Where TOP Assay is performed, quality assurance checks must be undertaken in accordance with the remeasures stated in section 19 of the HEPA 2025, including that oxidant exhaustion has not occurred (e.g. reanalysis to determine presence of fluorotelomer).
18. Wherever practical, all samples must be analysed by a NATA accredited laboratory.
19. Records must be kept of the results of all determinations and monitoring carried out under this EEO for a period of at least seven (7) years.
20. At least 1 week prior to submitting samples to the analysing laboratory, provide sample ids, matrix details, purpose of monitoring location/bore, coordinates for each groundwater sample and bore logs to ESComplianceBrisbaneMoreton@des.qld.gov au for the purpose of entry into the ESdat system.
21. All sample chain of custody (COC) forms are to include a direction to send sample results via email to desqld@esdat.net.
22. Submissions must be made in writing via email: ESComplianceBrisbaneMoreton@des.qld.gov.au.

B. Compliance with the requirements

In determining compliance with these requirements of the EEO, the department has considered:

- Stage 1 Stormwater Monitoring investigation. Liquid Terminals Australia Pty Ltd, 200 Tingira Street Pinkenba, ADE Consulting Group 27 February 2026.
- The Sampling Quality Analysis Plan 200 Tingira Street, ADE Consulting Group, 27 March 2026.
- Firefighting foam system audit and decontamination methodology report Quantem Terminal – 200 Pinkenba, Fire Engineering Solutions (QLD) Pty Ltd, 20 August 2025.
- Stage 2 Stormwater Contaminant Source Investigation - 200 Tingira Street, Pinkenba QLD 4008, ADE Consulting, 2 July 2026.
- Groundwater Monitoring and Hydrogeological Assessment –- Liquid Terminals Australia Pty Ltd 200 Tingira Street, Pinkenba QLD 4008, ADE Consulting Group, 5 June 2026.
- Various submissions via the departments LabSync email address for ESdat.
- Email correspondence from Liquid Terminals / Quantem including the Foam Transition Work Plan for 200 Tingira Street prepared by Arcardis on 24 April 2026 advising that the foam change out would be completed by the end of May 2026.

C. Obligations

The department has determined that Liquid Terminals Australia Pty Ltd has substantially satisfied the requirements of the EEO. In making this determination, the department has considered the minor deviation associated with the number of stormwater monitoring rounds which was undertaken following consultation with the department and with its agreement, as well as the short delay in submission of the Stormwater Stage 2 investigation.

Accordingly, this letter serves as a notice that this EEO is finalised and no longer in effect.

Liquid Terminals Australia Pty Ltd is reminded of their responsibility to comply with conditions contained in Environmental Authority EPPR01476813, duties under the Act, and any existing development approval.

In regard to duties under the Act, the department generally supports ADE Consulting Group's recommendations in the Stage 2 stormwater investigations with regards to further assessment and the ongoing site management strategy:

1. In the short term, operational source control measures, including removal of PFAS-impacted interceptor sediment and regular inspection and replacement of potentially impacted storm filter media, should be considered in parallel with further investigation.
2. A PFAS mass flux assessment is recommended as the next step, to quantify PFAS loading to the receiving environment and to address the distinction between the site-controlled, intermittent discharge pathway from the containment bunds (in particular the western bund where greatest PFAS impacts were identified) and the unrestricted stormwater drainage pathway outside of the bunded areas. This information could be used to inform future risk assessments, where required.
3. Further characterisation/delineation of the primary PFAS mass locations identified during this investigation (G11 and G12) is recommended to support remedial options assessment and to inform the

mass flux assessment.

4. A review of site records and/or a site inspection is recommended to confirm whether legacy PFAS containing foam concentrates have been removed, and whether associated foam storage tanks, pipework, and fire suppression infrastructure have been decontaminated or otherwise appropriately managed. Where the review identifies that foam concentrate removal or infrastructure decontamination has not been completed, appropriate source removal or decontamination measures should be considered

In relation to Item 2 above, the use of mass flux to inform risk assessments in the receiving environment is unlikely to be supported or required, as it does not demonstrate the implementation of reasonably practicable measures to prevent or minimise releases of prescribed water contaminants.

However, the department supports the use of mass flux to inform remedial options, prioritisation and the timing and staging of remediation activities. This support is subject to Liquid Terminals Pty Ltd's environmental authority obligations and the requirements of section 440ZG of the Act.

The department will continue to seek further information regarding implementation of these recommendations.

The department appreciates Liquid Terminals Australia Pty Ltd's cooperation throughout the EEO process and looks forward to continued engagement regarding further assessment and management of PFAS impacts at the premises.

D. Public Register

Section 148(h) of the Environmental Protection Regulation 2019 requires that any document the administering authority gives to the recipient of the order that releases to compliance, or non-compliance with an EEO are releasable on the public register. A copy of this document will be kept on the public register. The register is available for inspection by members of the public who are able take extracts or copies of the documents from the register. Documents that are required to be kept on the register are published in their entirety unless redaction in part is required by the Act. There is no general discretion allowing the department to withhold documents or information required to be kept on the public register. For more information on the department's public register, search 'public register' at www.qld.gov.au. For queries about privacy matters, please email privacy@des.qld.gov.au or telephone 13 74 68.

E. Issued by

Leonie Clough
Principal Environmental Officer
Delegate of the Administering Authority
Dept of the Environment, Tourism, Science and Innovation

10/09/2026

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