

# Environmental Assessment Report

## Wood Plastics Composites Facility

*Bell Bay*

Timberlink Australia Pty  
Ltd

*February 2022*



ENVIRONMENT PROTECTION AUTHORITY

## Environmental Assessment Report

Proponent	Timberlink Australia Pty Ltd
Proposal	Wood Plastics Composites Facility
Location	331 Old Bell Bay Road, Bell Bay
Class of Assessment	2A
PCE no.	10955
Permit Application No.	DA 2021-77 (George Town Council)
MyDAS Folder No.	21/3503
MyDAS Document No.	D22-48783

## Assessment Process Milestones

14 July 2021	Notice of Intent submitted to the Board
23 July 2021	Permit Application submitted to Council
28 July 2021	Referral received by the Board
27 August 2021	Guidelines Issued
11 December 2021	Start of public consultation period
11 January 2022	End of public consultation period
15 February 2022	Statutory period for assessment ends

## Glossary/Acronyms

Board	Board of the Environment Protection Authority
EER	Environmental Effects Report
EIA	Environmental impact assessment
EMPC Act	<i>Environmental Management and Pollution Control Act 1994</i>
EMPCS	Environmental management and pollution control system
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
HDPE	High-density polyethylene
LUPA Act	<i>Land Use Planning and Approvals Act 1993</i>
NC Act	<i>Nature Conservation Act 2002</i>
NOI	Notice of Intent
NRE	Department of Natural Resources and Environment Tasmania
RMPS	Resource Management and Planning System of Tasmania
SD	Sustainable development
TSP Act	<i>Threatened Species Protection Act 1995</i>
WPC	Wood and plastics composite
VOCs	Volatile Organic Compounds

## Report Summary

This report provides an environmental assessment of the Wood Plastics Composites Facility proposed by Timberlink Australia Pty Ltd.

The proposal is for a wood and plastics bio-composite (WPC) plant at Timberlink Australia's existing Level 2 Wood Processing works, Bell Bay, with a maximum production of 3767 m<sup>3</sup>. The WPC product is created by combining wood fibre (55%), recycled plastic (HDPE) (35%), and colours and additives (10%). The wood fibre will be sourced from waste material from the existing wood processing works, and the recycled plastic will be purchased in granule form from a local supplier. A new building is proposed for the site which will contain equipment to produce the WPC, including a drier, extruder, cooling tanks and cutting saw.

This report has been prepared based on information provided in the permit application and Environmental Effects Report (EER). Relevant government agencies and the public were consulted, and their submissions considered as part of the assessment.

The existing level 2 activity (wood processing works) on the site will continue to be regulated under EPN 8563/3. Any new permit conditions (PCE 10955) will apply to the new proposed Wood Plastic Composites facility permit (DA 2021-77 (George Town Council)). It is understood that the proponent will request the EPN and permit are combined for future regulatory purposes.

**Appendix I** contains the environmental permit conditions.

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## I Approval Process

The Board of the Environment Protection Authority (the Board) received a Notice of Intent in relation to this proposal on 14 July 2021.

An application for a permit under the *Land Use Planning and Approvals Act 1993* (LUPA Act) in relation to the proposal was submitted to George Town Council on 23 July 2021.

This proposal is defined as a 'level 2 activity' under clause 2(g), Schedule 2 of the *Environmental Management and Pollution Control Act 1994* (EMPC Act), being a wood processing works.

Section 25(1) of the EMPC Act required Council to refer the application to the Board of the Environment Protection Authority (the Board) for assessment under the Act. The application was received by the Board on 28 July 2021.

The Board required that information to support the proposal be provided in the form of an Environmental Effects Report (EER), prepared in accordance with the Guidelines issued by the Board on 27 August 2021. Several drafts of the EER were submitted to EPA for review against the Guidelines prior to finalisation and acceptance on behalf of the Board on 7 December 2021.

The EER was released for public inspection for a minimum 14-day period (extended to 11 January 2022 due to Christmas/New Year advertising requirements) commencing on 11 December 2021. Advertisements were placed in *The Examiner* and on the EPA website.

The Executive Director, Environmental Assessments has undertaken determination of the assessment under delegation from the Board.

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## 2 SD Objectives and EIA Principles

The proposal must be considered by the Board in the context of the objectives of the Resource Management and Planning System of Tasmania (RMPS), and the Environmental Management and Pollution Control System (EMPCS). Both sets of objectives are specified in Schedule 1 of the EMPC Act.

The functions of the Board are to administer and enforce the provisions of the EMPC Act, and to use its best endeavours to further the RMPS and EMPCS objectives. The Board must assess the proposal in accordance with the Environmental Impact Assessment Principles defined in Section 74 of the EMPC Act.

### 3 The Proposal

The main characteristics of the proposal are summarised in Table I. A detailed description of the proposal is provided in Section 2 of the EER.

**Table I: Summary of the proposal’s main characteristics**

<b>Activity</b>	
<p>The proposal is for a facility to produce wood plastics composite products, such as decking and screening, at quantities of up to 4,000 cubic metres per annum (equivalent to 4,234 tonnes per annum) at full production.</p> <p>The facility will be housed within a new building at the existing Timberlink Australia site (see Figures 1 and 2), which will contain machinery and equipment to combine dried wood pellets produced on site from timber plantation residue (55%) with recycled HDPE (35%) and dyes and lubricants (10%) to create a molten material mix, which can then be extruded into desired shapes, cooled, and embossed, brushed, cut to standard lengths, and then packaged for transportation and sale.</p>	
<b>Location and planning context</b>	
<b>Location</b>	331 Old Bell Bay Road, Bell Bay, as shown in Figure 1 and Figure 2.
<b>Land zoning</b>	25.0 General Industrial, <i>George Town Interim Planning Scheme 2013</i> . The site is subject to a Bushfire Prone Area overlay under the planning scheme.
<b>Land tenure</b>	Title reference 168618/2 with property ID 3359262, held by Timberlink Australia Pty Limited.
<b>Activity site</b>	
<b>Land Use</b>	<p>The site has a history of timber processing operations and has been closely associated with other neighbouring operations in the Bell Bay industrial area.</p> <p>Current operations at the site include receipt of raw logs and their processing, preservation, treatment, and value-adding before dispatch to buyers.</p> <p>The site has previously been a eucalyptus plantation, has contained a Medium Density Fibreboard (MDF) plant, sawmill facility, and timber preservation plant.</p>
<b>Topography</b>	The site is located in a relatively flat area, 30 – 35 metres AHD, 1.3 km north and east of the River Tamar.
<b>Geology/soils</b>	<p>The site is characterised by moderately weathered basalt rock at depths of about 5 m below ground surface (bgs), becoming slightly weathered to fresh below about 7 m bgs. These basalt flows are overlain by a relatively uniform silty/sandy clay soil. Topsoil consists of a fine silty sand/sandy material, typically 0.5 m bgs, but up to 0.8 m bgs in some locations.</p> <p>Exposed outcrops of cemented sands and ironstone gravel are present on the north-eastern corner of the site.</p>
<b>Hydrology</b>	<p>There are no water bodies within 200 metres of the site. There are wetlands and water bodies on the south and east of the site, with the southern areas forming part of existing detention pond systems. The direction of groundwater flow is towards the south-west.</p> <p>Previous land uses may have resulted in soil and/or groundwater contamination. The existing site has a groundwater monitoring plan in place.</p>
<b>Natural Values</b>	The landscape has been heavily modified by industrial activity on the site, including timber processing and contains no natural values. Most of the site is cleared, with some sparse areas of tree coverage to the north, south-west, and south-east.

<b>Local region</b>	
<b>Climate</b>	<p>Bell Bay experiences a cool temperate climate.</p> <p>The closest weather observation is at Low Head (BOM site number: 091293). Mean rainfall at this site is 677 mm per year, with August being the wettest month with a mean rainfall of 77 mm.</p> <p>Predominant wind direction throughout the year at 9:00 am is from the west and/or south with a mean speed of 25 km/h, and at 3:00 pm from the west and/or northwest, with a mean speed of 28 km/h.</p> <p>Mean maximum temperature is 17°C (the hottest month is February with a mean average of 21°C), and the mean minimum temperature is 11°C (the coldest month is July with a mean average of 7°C).</p>
<b>Surrounding land zoning, tenure and uses</b>	<p>The site is directly bounded to the north, east and west by land zoned for General Industry, and to the south by land zoned as Utilities (see Figure 3). Temco and the George Town wastewater treatment plant are located to the south of the site.</p> <p>The site is not located within or adjacent to an existing reserved area or site of high public interest. The nearest sensitive use is a single residence located 1,200 metres to the north-east, with most sensitive uses located approximately 1,400 – 1,500 metres to the north-west and west (refer to Figure 1 below).</p> <p>The site is 1.3 km from the River Tamar, 6.5 km to the north coast/Bass Strait, and 1 km from the nearest designated public open space (to the north).</p> <p>Refer to Figure 3 below.</p>
<b>Species of conservation significance</b>	<p>There are no species of conservation significance on or near the proposed site.</p> <p>A number of common weeds have been mapped as occurring in the general vicinity of the site (creeping thistle, boneseed, blackberry, gorse, and Spanish heath).</p> <p>The southern boundary of the property, beyond the modified area of the existing plant and south of the sealed access road, contains the Threatened Native Vegetation Community (NC Act, 2002) <i>Melaleuca ericifolia</i> swamp forest.</p>

<b>Proposed infrastructure</b>	
<b>Major equipment</b>	Gravimetric feeders Wood fibre drier Main core extruder and polymer pump Co-extruders Tooling and calibration unit Cooling tanks and chiller Haul off Embossing unit Brushing unit Cutting saw Packaging machine Refer to Figure 4 below.
<b>Other infrastructure</b>	Associated with existing timber milling and preservation activities on site, such as stormwater treatment infrastructure.
<b>Inputs</b>	
<b>Water</b>	Water for cooling units mainly sourced from rainwater harvested from the rooftop of the new building (into 2 x 24,000 L tanks). Supply to be supplemented by mains water during dry periods.
<b>Energy</b>	Electricity for equipment (solar panels with 100Kw capacity and grid). Diesel/petrol for mobile plant and vehicles.
<b>Other raw materials</b>	Plantation pine fibre pellets Recycled HDPE granules Calcium carbonate/HDPE granules Coupling agent granules Lubricant granules Masterbatch (a concentrated mixture of pigments and/or additives encapsulated during a heat process) with colour and UV stabilisers
<b>Wastes and emissions</b>	
<b>Liquid</b>	Water containing small particles of timber/plastic from emptying of water cooler units approximately twice per annum. Stormwater.
<b>Atmospheric</b>	Water vapour emissions. Particulate matter (PM <sub>2.5</sub> and PM <sub>10</sub> ). Hydrocarbons. Volatile Organic Compounds (VOCs - e.g. aldehydes, turpenes, formic acid, acetic acid, alkanes and alkenes). Dust from demolition and construction activities, earthmoving operations, wind erosion from stockpiles, vehicular movements.

<b>Solid</b>	Offcuts and fragments from manufacturing. Dust from brushing and cutting units. Packaging wastes.
<b>Controlled wastes</b>	Oils for maintenance of plant and equipment.
<b>Noise</b>	Main noise sources: Wood drier (fan and electric motor). Main core extruder (hydraulic power pack, co-extruder x 2). Finishing (electric motors x 13). Cooling (chiller x 2). Vehicle and plant (e.g. forklift) movements.
<b>Greenhouse gases</b>	Direct emission through use of diesel/petrol powered machinery, transport, and mobile plant. Use of electricity on site is predominantly hydro sourced.
<b>Construction, commissioning and operations</b>	
<b>Proposal timetable</b>	The EER outlines the following timetable: Construction commencement: February 2022. Building works proposed for completion: July 2022. Equipment installed: September 2022. Commissioning and training: October – December 2022. Production is projected to commence by 2023.
<b>Operating hours (ongoing)</b>	The proposed plant is expected to operate 24 hours per day, 5 days per week, 240 days per year. Hours for the current operations on the site are 24 hours, 7 days per week. The EER states that there may be scope to increase the currently proposed operation to 7 days per week.

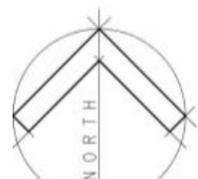
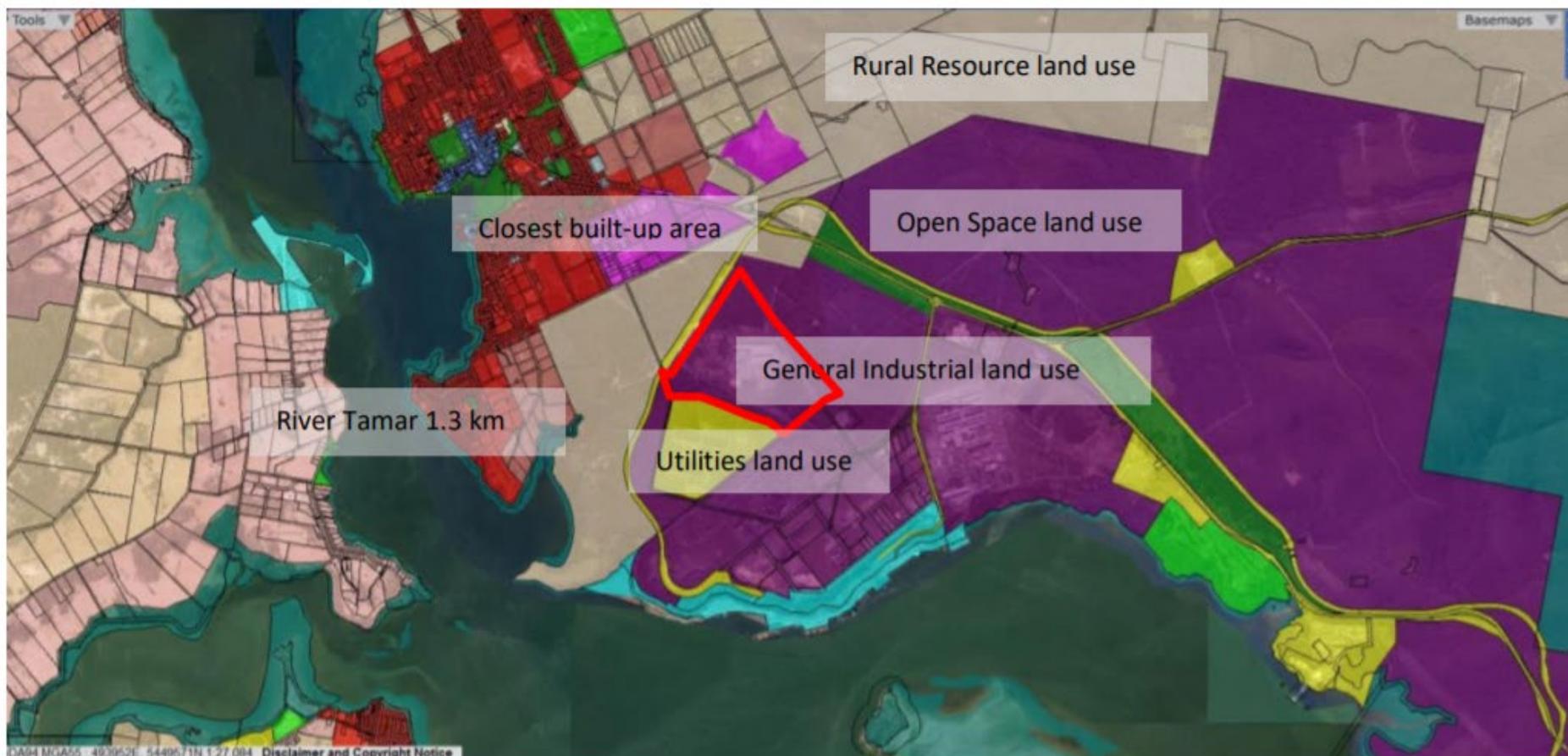


Figure 1: Proposal location and surrounds (Figure 2 of the EER)



**Figure 2: Proposed building location within existing site (Figure 3 of the EER).**



**Figure 3: Site zoning and nearby uses (Figure 6 of the EER).**

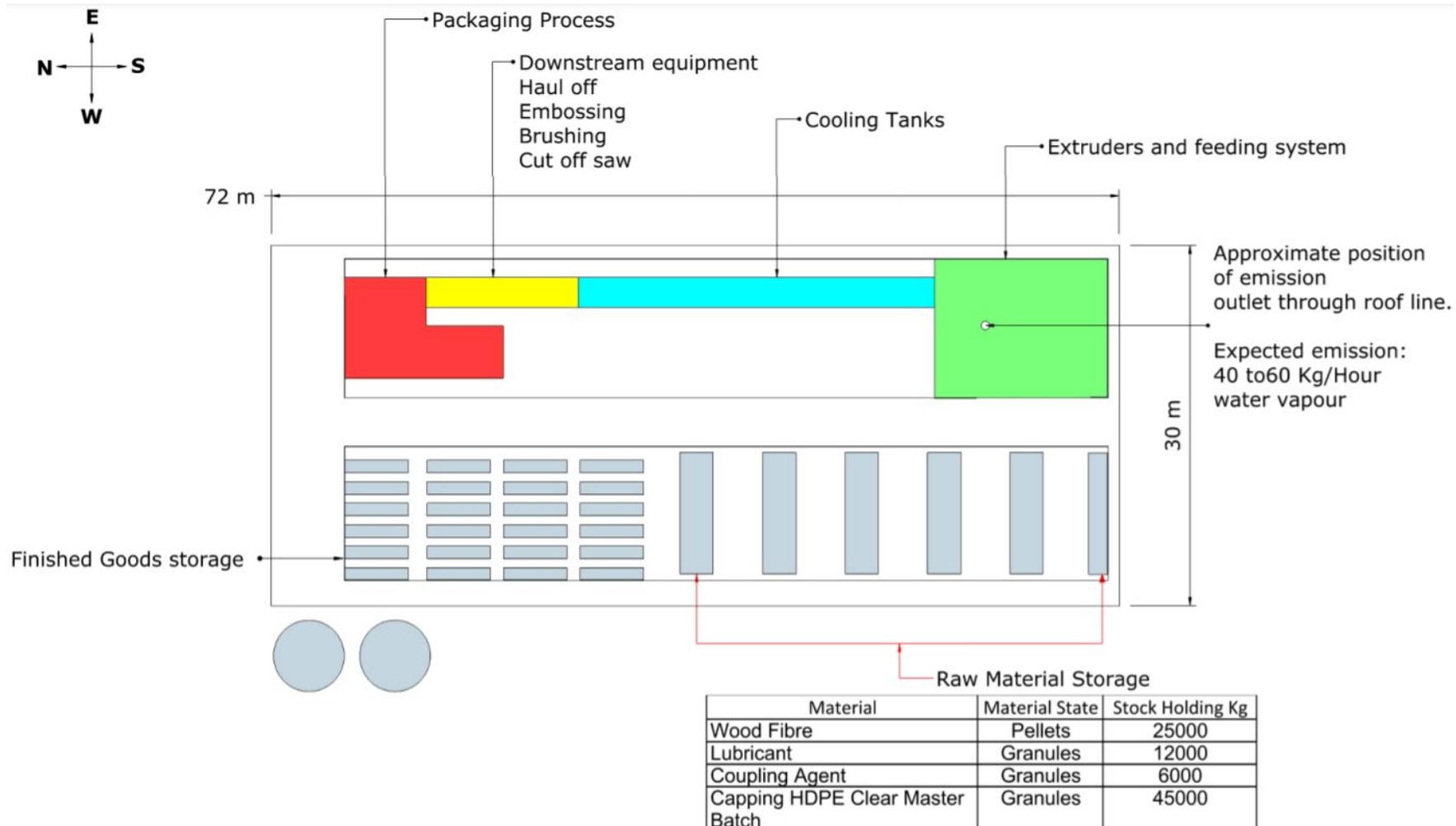


Figure 4 Indicative positions of plant, machinery and storage (Figure 4 of the EER)

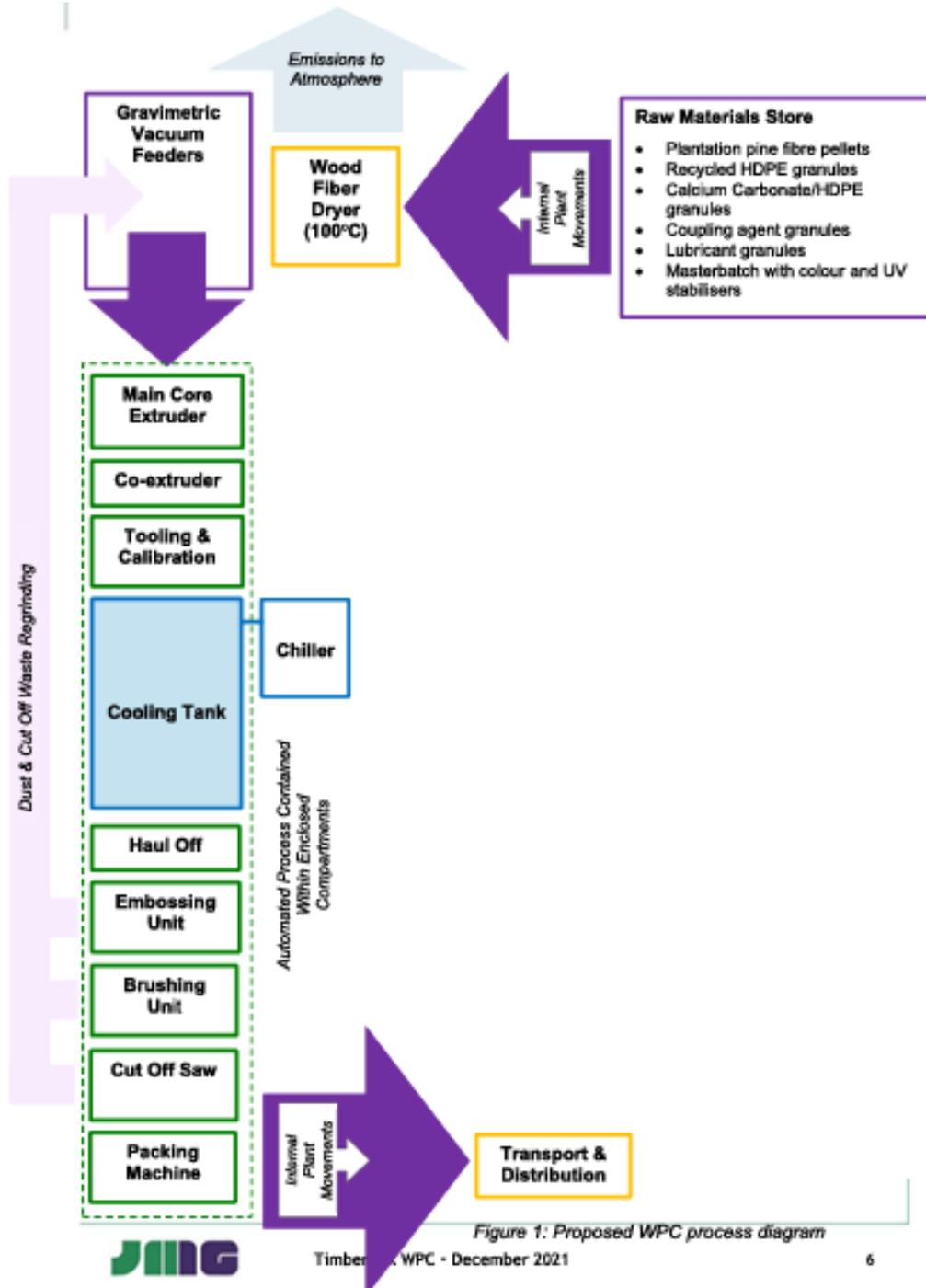


Figure 1: Proposed WPC process diagram

Timberlink WPC - December 2021

## 4 Project Rationale and Alternatives

According to the EER, Wood Plastics Composites production offers an innovative and environmentally conscious method of repurposing waste materials and creating products with value. The project represents a significant investment in increasing waste recycling capacity and relieving pressure on domestic landfill in Tasmania. The facility's net environmental benefit will be maximised through the installation of solar panels and the harvesting of rainwater for use in the production process.

The facility will create 20 jobs in regional areas during construction and 9 jobs in total once in full production, and the project will entail a further \$12 M invested at Bell Bay. The proposed location of the new facility is directly linked to the onsite supply of sustainable plantation timber residue from Timberlink's existing activities on site. The proximity of the existing supply of this raw material provides considerable transport, processing, and cost advantages, and allows for direct re-use of residue material on site in a highly sustainable manner.

The Bell Bay site has been selected after an internal review that also included sites in Tarpeena (South Australia) and Melbourne. The current site was selected due to the availability of raw materials, specifically the production of onsite sustainable plantation wood fibre and the Tasmanian supply of HDPE. The options evaluation also considered minimising transport impacts, utilising renewable energy and electricity costs, site availability, and government support for the proposals.

## 5 Public and Agency Consultation

No public submissions were received during the public consultation period.

The EER was also referred to several government agencies with an interest in the proposal. Submissions were received from the following:

The following individuals also provided specialist advice on the EER:

- Regulatory Officer, Environment Protection Authority
- Scientific Officer (Air), Environment Protection Authority
- Scientific Officer (Noise), Environment Protection Authority

## 6 Evaluation of Environmental Issues

The following environmental issues are considered relevant to the proposal and have been evaluated in this section:

1. Air emissions
2. Water and effluent
3. Noise emissions
4. Waste management
5. Environmentally hazardous substances
6. Site contamination (historic)
7. Decommissioning and rehabilitation

### General conditions

The following general conditions will be imposed on the activity:

- **G1** Access to and awareness of conditions and associated documents
- **G2** Incident response
- **G3** No changes without approval
- **G4** Change of responsibility
- **G5** Change of ownership
- **Q1** Regulatory limits

<b>Issue 1: Air emissions</b>
<b>Potential impacts</b>
<p>WPC production has the potential to produce air emissions which may cause environmental nuisance if not managed appropriately. The proposal is housed within a building and will generate air emissions from several processes, including the wood pellet drier, cutting, brushing and other physical processing and the extrusion process. The main potential pollutants to air identified are particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>) and volatile organic compounds (VOCs). These will be emitted during the drying of wood pellets from a single stack on the roof of the building. Further processing and extrusion of the WPC product occurs within enclosed compartments. Extrusion of HDPE has the potential to produce volatile emissions, particularly if high processing temperatures are used (Patel &amp; Xanthos, 2001). The operational temperature of the extruder is 160-180 °C, below the decomposition temperature range for HDPE (335-450°C).</p> <p>Dust emissions will occur from physical processing, including movement of material and from the cutting, sawing and brushing of product. The air quality review conducted as part of the EER also identifies potential dust emissions during construction.</p> <p>The nearest sensitive receivers are 1.2 km to the north-east (see Figure 1). Dominant wind directions in Bell Bay are W-NW. The air quality review conducted as part of the EER (Appendix 7) describes the local air environment, and states that “even including the effects of emissions from all industrial facilities around Bell Bay, the PM<sub>10</sub> and PM<sub>2.5</sub> levels are most commonly lower than their 24-hour average standard”. The Tasmania Department of Health air quality health categories define PM<sub>2.5</sub> values below 25 µg/m<sup>3</sup> as acceptable. No ambient monitoring data for VOCs are available in the Bell Bay area, however information from Victorian EPA monitoring campaigns indicate that VOC levels in urban environments are typically low.</p>
<b>Management measures proposed in EER</b>
<ul style="list-style-type: none"> <li>• Undertake post-commissioning stack testing of the drier, including measurement of:             <ul style="list-style-type: none"> <li>• Individual VOCs including but not limited to aldehydes (e.g. formaldehyde, acetaldehyde, propanal, hexanal, valeraldehyde, acraldehyde), turpenes (e.g. pinene, camphene, limonene), formic acid, acetic acid, alkanes and alkenes</li> <li>• Total VOCs</li> <li>• Particulate matter – total particulate matter, PM<sub>10</sub> and PM<sub>2.5</sub></li> <li>• Gas flow rate, gas temperature, and moisture content</li> </ul> </li> <li>• Apply dust mitigation measures as typically applied for construction sites</li> </ul>
<b>Public and agency comment</b>
No comment was received.
<b>Evaluation</b>
<p>This assessment considers the impacts of the proposed activity itself, and the changes to current air quality emissions caused by the proposed WPC facility; it does not assess emissions of the existing Timberlink site, although the impact of those emissions must be considered in the context of existing air quality. The management measures proposed are appropriate to minimise potential environmental impacts of air emissions from WPC production. EPA’s Air Specialist considers that emissions associated with operation of the proposed WPC facility are unlikely to have material impact on local ambient air quality and would not cause environmental nuisance. The main emissions from the proposal are likely to be from the pellet dryer, and include PM<sub>10</sub>, PM<sub>2.5</sub> and VOCs. It is not expected that air emissions will be generated from the extrusion process, as the operational temperature is well below the decomposition range of HDPE.</p>

However, as no information from similar plants could be provided, the proposed management measure to perform post-commissioning stack testing of the dryer is supported and will be required by conditions **A1** and **A2**. The conditions will require stack testing to be performed within 30 days of commissioning by a method approved by the Director. The plan will require detailed proposals for measurement of point and fugitive sources of emissions, including VOCs and particulate matter from the activity as identified in the EER. This will ensure that if any VOC emissions of concern are identified, appropriate mitigation and management measures can be applied. Any further stack testing must be conducted if reasonably required by the Director. The proposed dust management measures and containment of processes within enclosed compartments, are appropriate. Condition **A3** requires that the proposed sawdust collection and storage system is designed and maintained to prevent dust from becoming an environmental nuisance. Condition **A4** requires that management measures are applied during construction to prevent environmental nuisance from dust, consistent with the proposed management measures.

### Conditions

The proponent will be required to comply with the following conditions:

- A1** Survey of air emissions
- A2** Air Emissions Survey Report
- A3** Control of fugitive emissions - sawdust
- A4** Control of dust emissions during construction

<b>Issue 2: Water and effluent</b>
<b>Potential impacts</b>
<p>The WPC production will produce liquid effluent when water from cooling tanks for the extrusion process is emptied, approximately 5,000 L twice a year. The WPC product will pass through the cooling water (see Figure 5) which is recirculated as part of a closed system and may result in wood and plastic particle contamination. Microplastic pollution is an increasing global problem in water bodies, and when accessible to aquatic organisms has the potential for environmental and human harm (Sharma &amp; Chatterjee, 2017).</p> <p>Materials used to produce WPC have the potential to cause harm if spilled and released to the environment. Raw materials stored on site include wood fibre pellets, dyes and lubricants which are stored in granular form. Sawdust may be produced during processing, which can cause harm if released to waterways. In addition, other small quantities of fuels, oils, solvents, and other cleaning chemicals will be used for maintenance.</p> <p>The activity is situated within a building to be constructed on hard surfaced areas. There are no water bodies within 200 m of the site. Wetlands and waterbodies lie to the south and east of the site. The southern areas of the site form part of an existing detention pond system. Water for the cooling tanks will be mainly sourced from two 24,000 L rainwater tanks on the site, and excess stormwater will be directed to an existing stormwater detention system on site.</p>
<b>Management measures proposed in EER</b>
<ul style="list-style-type: none"> <li>• Proposed actions for management of cooling water:             <ol style="list-style-type: none"> <li>1. At the commencement of production any water in the cooling tanks requiring removal shall be sent to liquid hazardous waste disposal through an accredited licenced waste disposal contractor;</li> <li>2. Wastewater from the process located in the cooling tanks shall be tested independently for contaminants during production conditions;</li> <li>3. From the results of testing, a plan of disposal will be developed, where it will be decided whether to apply for a Trade Waste Agreement with TasWater including the required mitigation measures to meet environmental standard, or to seek offsite disposal at a licenced facility (Timberlink have been in discussions with TasWater regarding the potential disposal of this water as trade waste through a new Trade Waste Agreement, which would require approved plumbing plans for the facility that demonstrate any required mitigation measures).</li> </ol> </li> <li>• Stormwater discharge will be collected and treated via the existing Stormwater Management System.</li> <li>• All inputs for the activity will be stored in a secured location.</li> <li>• Operational areas are hard surfaced areas within the building envelope and will be cleaned regularly. Spill kits will be accessible throughout to site to prevent potential spills from entering the groundwater/stormwater systems.</li> <li>• All sources of dust emissions for the operation are equipped with a dedicated dust collection system.</li> </ul> <p>Existing monitoring is undertaken of settling ponds, wetlands ponds and groundwater within the site (as part of the EPN for the existing activity).</p>
<b>Public and agency comment</b>
No comment received.

## Evaluation

The proposed management measures to dispose of the wastewater from the water cooling tanks are considered appropriate to minimise the risk of wood and plastic particles being released to the environment. Condition **E1** will require that water from the cooling tanks is removed by a licenced waste disposal contractor or discharged to sewer only with approval of the operator of the sewage system. The proponent advised that they have confirmed that the cooling water can be disposed by local licenced waste disposal contractor. As stated in the EER, further testing for contaminants, potential mitigation measures (such as filtration), and a new Trade Waste Agreement will be required by the operator before discharge to sewer is allowed. Site practices which prevent contaminants such as sawdust, dyes, lubricants and other fuels, solvents and soils encountering stormwater will minimise the risk of surface water contamination. The proposed management measures are appropriate to reduce the risk of contaminated stormwater from leaving the site and will be conditioned through **E2**. Conditions relating to control of fugitive dust emissions and environmentally hazardous substances are discussed in the relevant sections.

## Conditions

The proponent will be required to comply with the following conditions:

**E1** Wastewater from Cooling Tanks

**E2** Stormwater

### Issue 3: Noise emissions

#### Potential impacts

Noise emissions produced by the industrial activities such as WPC production may cause annoyance and disturbance to sensitive receivers without adequate mitigation measures or separation distances. The proposed WPC facility will be situated within a shed in the existing Timberlink site, and will generate noise from several new sources, including the dryer, extruder, finishing processes and the chiller, with nominal sound power levels detailed in *Appendix D of the EER, Table 1: Noise sources*. Hours of operation of the new facility are 24 hours, five days a week, as opposed to the existing site which operates 24 hours, seven days a week. Four daily off-site truck movements will be associated with the WPC facility.

Nearest sensitive receivers are 1.2km to the north-east, as indicated in Figure 1. Typical noise levels in these areas, which are measured for three yearly noise surveys required for the EPN for the existing activity on site, are listed in Table 1. The EER states that noise from the existing Timberlink activity is not perceived as audible in any of the measurements, which operates under existing noise emission limits. Noise modelling conducted for the EER predicts that noise from the proposed WPC plant will not affect the current acoustic environment at the nearest sensitive receivers.

**Table 1. Typical noise levels measured in George Town, adapted from Appendix 2 of the EER, Table 2**

	Sound Pressure Level	
	L <sub>90</sub>	L <sub>eq</sub>
<b>Day</b>	37	41
<b>Evening</b>	36	39
<b>Night</b>	35	38

#### Management measures proposed in EER

A noise survey will be conducted once the facility is operational, with the intent of the survey being to:

- Conduct measurements in and around the WPC facility sufficient to define its sound power level, and
- Conduct measurements at the nearest sensitive receivers during the day and night time to confirm site noise emissions continue to meet the site EPN noise criteria.

#### Public and agency comment

No comment received.

#### Evaluation

Noise from the WPC plant is not expected to cause nuisance sensitive receivers based on the modelling of predicted emissions. The noise emission limits for the existing activity on site will also be applied to the new activity by condition **NI**:

- 45 dB(A) between 0700 hours and 1800 hours (Day time); and
- 40 dB(A) between 1800 hours and 2200 hours (Evening time); and
- 35 dB(A) between 2200 hours and 0700 hours (Night time).

The proposed management measure to conduct a noise survey after commissioning is supported to define the sound power levels, confirm that noise emission limits will be met to ensure that existing acoustic environment is not compromised, and identify if any further mitigation is required to meet limits. Condition **N2** will require that a noise survey is required within 60 days of commissioning, or within 60 days of any substantial changes to the activity which will alter the character of noise emissions. Condition **N3** will require simultaneous noise monitoring to record noise levels at source and at receiver. Additionally, source noise measurements will be required to record the noise characteristics (1/3 octave band data including low frequency) of each item of installed equipment. No limits to operational hours are considered necessary given noise limits and existing use of the land.

### Conditions

The proponent will be required to comply with the following conditions:

**N1** Noise emission limits

**N2** Noise survey requirements

**N3** Noise survey method and reporting requirements

<b>Issue 4: Waste management</b>
<b>Potential impacts</b>
Excessive waste accumulation and generation associated with timber processing can increase the risk of environmental contamination. The proposed activity has the potential to generate solid wastes including off-cuts from the product, sawdust, and packaging waste.
<b>Management measures proposed in EER</b>
<ul style="list-style-type: none"> <li>• Off cuts and fragments from the manufacturing process will be collected, reground, and returned into the extrusion process.</li> <li>• Dust from the brushing and cutting units will be captured and returned into the extrusion process.</li> <li>• Waste from packaging will be transferred to skips and disposed off-site.</li> </ul>
<b>Public and agency comment</b>
No comment received.
<b>Evaluation</b>
The waste management measures proposed are consistent with the best practice measures identified in the waste management hierarchy <b>O12</b> in the Other Information section of the permit and are supported. Inputs for production of the WPC include recycled HDPE, sustainable plantation timber residue, offcuts, and waste product, and will minimise solid waste impacts from the activity.
<b>Conditions</b>
Other information included in the permit: <b>O12</b> Waste management hierarchy

<b>Issue 5: Environmentally hazardous substances</b>
<b>Potential impacts</b>
Environmentally hazardous substances used in the WPC production include raw materials, wood fibre pellets, and granules of recycled HDPE, colours and lubricant. In addition, small quantities of fuels, oils, solvents, and cleaning chemicals will be used for maintenance. These substances have the potential to cause harm if spilled and released.
<b>Management measures proposed in EER</b>
<ul style="list-style-type: none"> <li>• Granule control methods including containment and removal will limit the risk of release to the environment.</li> <li>• All materials used in the activity will be stored within the building compound in an appropriate secured location as indicated in Figure 4.</li> <li>• Procedures are in place on site to deal with spillage and escape of substances, including spill kits, containment, and removal.</li> <li>• As part of the existing procedures on site any environmentally hazardous materials stored and handled on site will be kept on an inventory that specifies its storage location and maximum quantities, including material safety sheets where applicable.</li> </ul>
<b>Public and agency comment</b>
No comment received.
<b>Evaluation</b>
All hazardous substances are required to be appropriately stored and handled to reduce the risk of release to the environment. It is important to manage not only the risk of a large spill, but also smaller spills or leaks that may accumulate. The management measures proposed are considered appropriate to minimise the risk of environmental harm caused by storage and potential spills of hazardous substances on site and will be required by permit conditions <b>H1</b> and <b>H2</b> . Condition <b>H1</b> requires appropriate spill kits to assist with containment of spills. Condition <b>H2</b> requires that hazardous materials are stored in containment systems and managed to prevent discharge or emission to the environment.
<b>Conditions</b>
The proponent will be required to comply with the following conditions: <b>H1</b> Spill Kits <b>H2</b> Storage and handling of hazardous materials

<b>Issue 6: Site contamination (historic)</b>
<b>Potential impacts</b>
Effective management of site contamination prevents exposure and emission of pollutants from contaminated land, which can have negative off-site impacts. The site has a history of timber processing activities and is located within the Bell Bay industrial area with neighbouring industrial operations. The site is currently monitored for contaminants of potential concern under EPN 8563/3 for the existing Timberlink Australia timber processing activities.
<b>Management measures proposed in EER</b>
Monitoring of site contamination will continue to be undertaken in accordance with EPN No 8563/3 which includes monitoring of stormwater and groundwater to manage any risks identified in relation to historic site contamination.
<b>Public and agency comment</b>
No comment received.
<b>Evaluation</b>
The groundwater monitoring for site contamination for the existing timber processing operations will continue to take place under EPM No 8563/3. Apart from construction of the building, the proposed activity will not increase the risk of disturbance of site contamination. No further monitoring or measures are considered necessary.

<b>Issue 7: Decommissioning and rehabilitation</b>
<b>Potential impacts</b>
The WPC production facility has the potential to cause ongoing environmental impacts after cessation if not appropriately decommissioned through release of contaminants such as dust emissions, leachate, and stormwater to the environment.
<b>Management measures proposed in EER</b>
Decommissioning and rehabilitation measures in the event of cessation of the activity include removal of equipment and materials, and retention of the building as a storage shed.
<b>Public and agency comment</b>
No comment received.
<b>Evaluation</b>
If operations are suspended the site must be managed to prevent environmental harm or nuisance being caused by contaminants being released to the environment. Condition <b>DC1</b> requires the proponent to notify the Director of the permanent cessation of the activity. To ensure the site is rehabilitated to an acceptable standard, condition <b>DC 2</b> requires a Decommissioning and Rehabilitation Plan (DRP) is submitted to the Director within 30 days of the Director being notified of the planned cessation of the activity. Condition <b>DC3</b> requires rehabilitation of the site following permanent cessation, including removal of all environmental hazards or land contamination that might pose an ongoing risk, and condition <b>DC4</b> requires notification where a temporary suspension of the activity is likely occur.
<b>Conditions</b>
The proponent will be required to comply with the following conditions: <b>DC1</b> Notification of cessation <b>DC2</b> DRP requirements <b>DC3</b> Rehabilitation following cessation <b>DC4</b> Temporary suspension of the activity

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## 7 Report Conclusions

This assessment has been based on the information provided by the proponent, Timberlink Australia Pty Ltd, in the permit application, and the case for assessment (the EER).

This report incorporates specialist advice provided by EPA scientific and regulatory staff.

It is concluded that:

1. the RMPS and EMPCS objectives have been duly and properly pursued in the assessment of the proposal; and
2. the assessment of the proposal has been undertaken in accordance with the Environmental Impact Assessment Principles; and
3. the proposal is capable of being managed in an environmentally acceptable manner such that it is unlikely that the RMPS and EMPCS objectives would be compromised, provided that the Permit Conditions - Environmental No. 10955 appended to this report are imposed and duly complied with.

## 8 Report Approval



Martin Read

**EXECUTIVE DIRECTOR, ENVIRONMENTAL ASSESSMENTS**

**Acting under delegation from the Board of the Environment Protection Authority**

Date: 17 February 2022

## 9 References

Environment Division, 2004. *Environment Protection Policy (Air Quality)*. [Online] Available at: [https://epa.tas.gov.au/policy/statutory-policies/state-policies-and-environment-protection-policies/environment-protection-policy-\(air-quality\)-2004](https://epa.tas.gov.au/policy/statutory-policies/state-policies-and-environment-protection-policies/environment-protection-policy-(air-quality)-2004) [Accessed 2022].

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## 10 Appendices

### Appendix I Permit conditions



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## **Appendix I: Permit conditions – Environmental**



ENVIRONMENT PROTECTION AUTHORITY