

**Proposed major staged expansion of pine log  
sawmill, Moore Road, Dardanup**

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**Wespine Industries Pty Ltd**

**Report and recommendations  
of the Environmental Protection Authority**

**Environmental Protection Authority  
Perth, Western Australia  
Bulletin 669  
December, 1992**

#### THE PURPOSE OF THIS REPORT

This report contains the Environmental Protection Authority's environmental assessment and recommendations to the Minister for the Environment on the environmental acceptability of the proposal.

Immediately following the release of the report there is a 14-day period when anyone may appeal to the Minister against the Environmental Protection Authority's Report.

After the appeal period, and determination of any appeals, the Minister consults with the other relevant ministers and agencies and then issues his decision about whether the proposal may or may not proceed. The Minister also announces the legally binding environmental conditions which might apply to any approval.

#### APPEALS

If you disagree with any of the contents of the assessment report or recommendations you may appeal in writing to the Minister for the Environment outlining the environmental reasons for your concern and enclosing the appeal fee of \$10.

It is important that you clearly indicate the part of the report you disagree with and the reasons for your concern so that the grounds of your appeal can be properly considered by the Minister for the Environment.

#### ADDRESS

Hon Minister for the Environment  
12th Floor, Dumas House  
2 Havelock Street  
WEST PERTH WA 6005

#### CLOSING DATE

Your appeal (with the \$10 fee) must reach the Minister's office no later than 5.00 pm on 5 January, 1993.

ISBN 0 7309 4732 7

ISSN 1030 - 0120

Assessment No.725

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## Summary and recommendations

Wespine Industries Pty Ltd (the proponent), is a company which is jointly owned by Westralian Forest Industries Limited (Wesfi) and Bunnings Limited both of which are Western Australian based companies with long term major interests in timber products.

The proponent proposes a major staged expansion to its operations at the pine log sawmill, Moore Road, Dardanup. By making adjustments, replacements and additions to the existing plant and equipment and methods of operation, Wespine proposes to progressively increase the throughput via a series of stages, of the sawmill from the current annual log input capacity of 70,000 m<sup>3</sup> to 400,000 m<sup>3</sup> over a ten year period. Major changes involved in the upgrade of the Dardanup pine log sawmill involve replacement of existing equipment with more recently developed equipment, and additional handling, drying and machining capacity as the volume of intake logs increases.

The proposal was referred to the Environmental Protection Authority (EPA) in April 1992 and the level of assessment was set at Consultative Environmental Review (CER). The proponent prepared a CER which was released over a four week period which commenced 12 October 1992 and closed on 9 November 1992. During this time 32 Government and public submissions were received by the EPA. As well, public information days were held to discuss the proposal.

Wespine have negotiated with the Department of Conservation and Land Management (CALM) to amalgamate their existing but separate timber supply contracts into one larger supply contract. A State Agreement Act (the Dardanup Pine Log Sawmill Agreement Act 1992) has been passed by Parliament.

The EPA has assessed the potential environmental impacts of the proposal, as described in the CER, and utilised additional information supplied by other government agencies, the public and the proponent. Senior officers of the EPA carried out site inspections and discussed environmental issues with members of the public and relevant government authorities.

In reaching its conclusion, the EPA identified the main environmental issues as:

- potential for noise to upset nearby residents;
- dangers associated with increased log truck traffic; and
- the risk of groundwater usage/contamination.

The EPA identified the issue of a buffer zone as being critical for this proposal. Other issues identified during the public review period included:

- the possible relocation of the sawmill;
- annoyance from smoke and dust emissions;
- dangers associated with kiln fires;
- the risks associated with chemical spillages;
- odour emissions;
- copper chrome arsenic (CCA) plant contamination;
- the potential for lighting overspill to upset residents;
- adverse effects upon land values in the area; and
- negative effects upon the lifestyles within the surrounding areas.

The Authority is confident that many of the environmental issues can be managed through good plant practices. Based on available evidence, noise emissions should be manageable to acceptable levels at nearby existing residential areas. However, the expanded activities of the sawmill will affect future land uses in the area, meaning that either the sawmill will be unable to operate, or there must be constraints on building houses in areas close to the sawmill. Such a constraint warrants consideration of compensation through planning mechanisms.

Based on its assessment of the proposal and additional information provided by the proponent in response to questions raised as a result of the assessment process, the EPA makes the following recommendations:

### **Recommendation 1**

**The Environmental Protection Authority concludes that the proposal by Wespine Industries Pty Ltd to expand its pine log sawmill operations, as outlined in the Consultative Environmental Review, is environmentally acceptable.**

**In reaching this conclusion, the Authority identified the main issues requiring detailed consideration as:**

- buffer zone**
- noise emissions**
- increased log truck traffic**
- groundwater usage/contamination**
- public liaison**

**The Environmental Protection Authority considers that these issues have been addressed and are manageable, either by the environmental management commitments given by the proponent, or by the Environmental Protection Authority's recommendations in this report.**

The environmental issues considered during the assessment of the proposal have been addressed as follows:

### **Buffer zone**

A major issue for this proposal is for the provision of a secure buffer zone.

With an appropriate buffer zone, issues such as noise emissions, dust and smoke emissions, odours and groundwater contamination are more easily managed to acceptable levels.

In order to be effective, however, it is necessary to limit activities within buffers to those which can operate in harmony with industry as well as with more sensitive adjacent land uses such as residential. Such activities could include light industry, general farming, conservation purposes or agroforestry.

The proponent has no control over any of the land surrounding the sawmill and therefore cannot directly establish buffer zones.

In the Dardanup Pine Log Sawmill Agreement Act 1992 it is proposed that land within approximately a 600m radius of the sawmill should not be rezoned without the specific approval of the Minister for Planning. The Agreement states that the zoning of the subject land *"shall not be changed during the currency of the Agreement to a zoning that is determined by the Minister for Planning, after consultation with the Minister and the relevant local authority to be incompatible with or likely to restrict or adversely affect the activities of the company under this Agreement"*.

In this Agreement the Minister for Planning also may extend the above condition to a larger area of land.

However, current zoning still allows for the construction and habitation of residential dwellings on the land referred to in the Agreement.

**Environmental impacts resulting from the sawmill expansion will have to meet acceptable levels at the nearest residence. If further residential development occurs then the proponent will be required to meet the necessary levels at those**

locations. Accordingly the EPA points out the implications of changing land uses around the plant on the operations of the sawmill. It is the opinion of the EPA that if any house is built close to the proposed expanded plant, that the plant will not be able to meet the noise constraints — either adequate arrangements need to be made to prevent houses being built in this area, with attendant issue of compensation, or the expansion should be opposed.

## **Noise emissions**

Noise modelling undertaken by the proponent indicate that under certain conditions noise emissions from the sawmill would exceed the EPA noise requirements at the nearby areas of Padbury Fields and to a lesser degree at Coppleshone: two special rural subdivisions. The monitored levels and the computer modelling show that noise emissions from the existing sawmill generally comply with the EPA policy for daytime levels at these areas.

When the expanded sawmill moves to operations on afternoon shift, there will be a requirement that the noise levels at the nearest residence is no more than 40 dB(A) during certain times of the afternoon shift.

The proponent is proposing a significant reduction in the existing noise levels as a result of the installation of new equipment and other specific noise control measures. The proponent's proposal includes upgrading and replacement of existing equipment in a manner which will allow for the compliance with the EPA noise requirements at Padbury Fields and Coppleshone. The proponent's strategy on noise management has, to this stage, centred around meeting EPA noise criteria at the nearby subdivisions of Padbury Fields and Coppleshone. This approach may prove unsatisfactory in the future as the current zoning of land surrounding the sawmill allows for further residential establishment.

The EPA has established a number of environmental conditions (eg for noise impacts) which are to be met at the residence nearest to an industrial facility. This approach will be used in this case. Should further residential development occur at locations closer to the plant then the proponent will be required to meet the necessary conditions at those locations.

## **Recommendation 2**

The Environmental Protection Authority recommends that the proponent should construct and operate the proposal so that combined noise emissions from the site do not unreasonably impact on the surroundings.

The Environmental Protection Authority recommends that the proponent should ensure that noise emissions do not exceed at the nearest house:

- (1) the ambient noise level present at any time by more than 5 dB  $L_A$  slow; and
- (2) • 40 dB  $L_{A10}$ , 1 hour slow between 2200 hours and 0700 hours on any day;
  - 45 dB  $L_{A10}$ , 1 hour slow between 1900 hours and 2200 hours on any day, and between 0700 hours and 1900 hours on Sundays and gazetted public holidays;
  - 50 dB  $L_{A10}$ , 1 hour slow between 0700 hours and 1900 hours on Monday to Saturday inclusive; and
  - 65 dB  $L_A$  slow when measured at other industries.

The Environmental Protection Authority recommends that the proponent should ensure that noise emissions from those activities which are of concern to occupiers of noise sensitive premises do not exhibit tones, amplitude and frequency modulation, and impulsiveness of a nature which increases the intrusiveness of the noise.

## **Log truck traffic**

Trucks carting pine logs and finished products use regional roads to gain access to and from CALM forests and Perth respectively. In the future it is expected that approximately 70% of the pine log trucks will use the Picton-Boyanup Road which translates to 34 additional truck movements. The remaining 30% will be along Martin Pelusey Road to access the south-western highway north which represents 14 movements per day.

The pine plantations from where the pine logs will be harvested are widely dispersed and therefore different routes will be used at different times. The proposed routes are established regional roads and highways which carry large volumes of truck traffic. The commitments given by the proponent (incorporating commitments by CALM) reflect the need to ensure that the impacts associated with the increased trucking will be managed in an environmentally acceptable manner.

The issue of safety along Moore Road has been raised as being very important by many residents. In addition to log truck traffic there are other truck and car traffic movements along Moore Road. The proponent has committed to various strategies which will be undertaken in consultation with the Main Roads Department in order to reduce the potential for traffic accidents along Moore Road. The EPA is satisfied that these measures will assist in alleviating the dangers associated with the anticipated log truck traffic along Moore Road.

## **Groundwater usage/contamination**

Advice from Water Authority of Western Australia (WAWA) indicates that the installation of an additional bore to extract 260,000 kL/annum should not have significant implications. It is probable that the additional bore would be sunk into the Yarragadee Formation to ensure that it does not interfere with the existing bore in the Leederville Formation. WAWA require that this bore be licensed and thus the proponent will need to establish that it will not interfere with other bore water users.

There has been some concern raised by WAWA relating to the paucity of water quality data, upon which the proponent has based its predictions regarding the lack of impacts on the surface drainage and shallow groundwater aquifer. WAWA are of the view that there is a need for a monitoring programme which will determine both the qualitative and quantitative effects of the proponent's activities upon the water resources of the area.

**The Company has made a commitment (number 11) that it will meet the requirements of WAWA in preparing and implementing a water monitoring programme.**

## **Community issues**

There has been considerable concern expressed by the community with respect to the social issues associated with this proposal. In particular, concern has been expressed with regard to proposed buffer zones and the acquisition of properties.

There has also been considerable disillusionment expressed by sections of the community regarding the lack of open discussion between the proponent and residents of Padbury Fields and Copplestone. Despite a survey being conducted by the proponent the residents initiated another survey at their own cost. Further use of the Social Impact Unit resources may have provided the necessary conduit for the facilitation of productive interaction and consultation between the proponent and the community.

The function of the Social Impact Unit as a facilitator between proponents and communities should be promoted at the early developmental stages of projects.

In order for meaningful dialogue to continue throughout the staged expansion of the sawmill it appears that a formal committee needs to be established. This committee is required in order to provide the necessary forum for open discussion and consultation on the issues associated with this project.

**The Company has made a commitment (number 4) that it will establish a community liaison committee to the satisfaction of the EPA.**

### **Relocation of sawmill**

Wespine was asked to examine the viability of relocating the sawmill to Lot 354, Moore Road Dardanup by members of the group representing Copplestone and Padbury Fields residents and by the Dardanup Shire Council.

Wespine have advised that the engineering and financial assessments indicate that the costs are prohibitive with regard relocation of the sawmill.

### **Smoke and dust emissions**

The mill has generated smoke in the past when piles of residual material were burnt on site.

There is the potential for the generation of fugitive dust as a result of the movement of logs and log trucks around the sawmill site.

**The Company has given a commitment (number 5) to manage the issue of dust. Smoke should not cause any environmental impacts, however should any problems occur the EPA will enforce the appropriate standards.**

The EPA is satisfied that with the measures implemented by the proponent the issue of smoke and dust emissions should be managed in an environmentally acceptable manner.

### **Lighting overspill**

There is the potential for light spill from the sawmill given that it will be operating after daylight hours.

**The EPA is satisfied that with the commitment (number 6) given by the proponent that the issue of lighting overspill will be managed in an environmentally acceptable manner.**

### **Other issues**

Other issues raised during the public review period include kiln fires, chemical spillages, odour emissions, copper chrome arsenic contamination and the use of blue gums at the sawmill. The EPA believes that these issues have been adequately addressed and are manageable by good plant housekeeping and work practices.



# 1. Introduction

The Environmental Protection Authority has assessed a proposal by Wespine Industries Pty Ltd (the proponent) for a major staged expansion of its pine log sawmill, Moore Road, Dardanup, about 4km north west of the town.

The proposal was referred to the Environmental Protection Authority in April 1992 and the level of assessment was set at Consultative Environmental Review (CER). The proponent prepared a CER which was released over a four week period which commenced 12 October 1992 and closed on 9 November 1992. During this time 32 public submissions were received by the EPA.

The CER describes a proposal to expand the existing pine sawmill at Moore Road, Dardanup. Production will increase from the present annual log intake of 70,000 m<sup>3</sup> eventually to 400,000 m<sup>3</sup> and possibly marginally higher depending on the availability of pine logs from private plantations. The expansion is expected to occur in stages during the period 1992-2003. The timing of each stage of the upgrade will be dependent on the market outlook for sawn pine timber at the time.

Matters ascertaining to the forestry operations which are involved in the development of pine plantations, logging operations and the transport of logs to the sawmill site are the responsibility of the Department of Conservation & Land Management (CALM).

Wespine has consulted with CALM who has agreed to specific commitments dealing with forest management to be included in the CER.

## 2. The proposal

The proponent is Wespine Industries Pty Ltd. The company is jointly owned by Westralian Forest Industries Limited (Wesfi) and Bunnings Limited both of which are Western Australian based companies with long term major interests in timber products.

### 2.1 Existing sawmill activities

The Dardanup sawmill is a modern milling complex, established in 1984, which consists of a green mill where logs are cut into planks and square timber, a high temperature drying kiln and de-humidifier where the timber is dried (seasoned), and a dry mill where the seasoned timber is converted into building products.

The mill currently receives about 70,000 m<sup>3</sup> per annum of pine logs from plantations throughout the south-west of Western Australia. It operates one shift in the green mill, one and a half shifts in the dry mill and continuously 7 days/week in the drying kiln.

The current log intake is carted to the mill by trucking contractors responsible to CALM. Logging and cartage contractors maintain their trucks in their own yards and only the maintenance of log handling vehicles is carried out on the sawmill site.

Once delivered the logs are unloaded and stacked in yards adjacent to the green mill prior to processing. Stacks of logs are kept wet to minimise dust problems and to prevent fungal staining of the wood.

Logs are transferred by front end loader to the debarking machine and are then cut into various dimensions and grades of timber by band and circular saws in the green mill. The timber is end trimmed by a series of small saws and then sorted, graded and stacked manually in open sheds adjacent to the mill after which it is transported by forklift to other areas of the plant for seasoning.

Graded timber is either air dried by allowing it to stand in stacks or dried in the kiln or dehumidifier. The kiln has a series of fans to introduce and extract air. The kiln and

dehumidifiers speed up the natural drying process of the timber so that it does not need to be kept on site for long periods. The requirements for drying the timber dictate that the kiln operate at temperatures above the boiling point of water.

Dried timber is trimmed, dressed and moulded to specification by either a high speed moulder or planer in the dry mill. After trimming and finishing the processed timber is batched and loaded onto trucks bound for Perth.

## **2.2 Upgrading of sawmill activities**

The upgrade will involve the replacement and duplication of existing sawmill equipment in order to make the mill more efficient. The upgrade will involve the full utilisation of the existing and proposed equipment in contrast to the existing situation in which the sawmill is operating at less than full capacity. This will involve an increase in activity at the mill from one shift for the green mill and one and a half shifts for the dry mill to two shifts, five days per week for both. The kiln will continue to operate 24 hrs/day, seven days/week.

The proposed stages of upgrade are as follows:

- Current, 1992 - 70,000 m<sup>3</sup>
- Stage 1, 1993 - 150,000 m<sup>3</sup>
- Stage 2, 1995 - 200,000 m<sup>3</sup>
- Stage 3, 1997 - 250,000 m<sup>3</sup>
- Stage 4, 1999 - 300,000 m<sup>3</sup>
- Stage 5, 2001 - 350,000 m<sup>3</sup>
- Stage 6, 2003 - 400,000 m<sup>3</sup>

## **3. Public consultation and submissions**

The EPA received 32 submissions on the proposal.

The proponent is aware that the proposed upgrade of the sawmill has created considerable interest within the local community. As a consequence the proponent has discussed the proposal with nearby residents, councillors and officers of the Dardanup Shire Council and others. This process has enabled the proponent to provide information to various components of the community.

The proponent undertook a public consultation programme to inform nearby residents and landowners of the proposed sawmill expansion. Many of the matters raised during early public consultation were centred around noise emissions, possible relocation of the existing sawmill, truck traffic, negative effects on property values and issues associated with proposed buffer zones. There was, however, concern raised within the community regarding the fairness of this programme and as a consequence a community initiated survey was conducted. The results of this survey were made available to the EPA.

Representatives from Wespine have attended meetings with the Dardanup Shire Council or its members on a number of occasions. These meetings included an open Council meeting on 19 June 1992 at which representatives from Wespine and the Department of State Development attended at the invitation of Council. Officers from the EPA and the Social Impact Unit were also present at this meeting. At this meeting the Council requested that the proponent consider relocation of the mill to a site north of the particle board plant. In response Wespine commissioned a financial analysis of the relocation of the mill. Following the outcome of the study the proponent has concluded that relocation is not a viable option. Officers of the EPA and the Social Impact Unit (SIU) have also attended other meetings of Council and local residents to outline the environmental assessment process.

The concerns and opinions of residents with regard to the upgrade of the sawmill have been sought by the proponent during meetings with interested people prior to the production of the CER. These have included a number of meetings with the Padbury Coplestone Residents Group: a group that was brought into existence to specifically consider the issues associated with the sawmill upgrade. In addition to these meetings representatives of Wespine and Wesfi have attempted to contact each household near to the sawmill within the subdivisions of Padbury Fields and Coplestone by personally visiting them. During these visits residents were invited to discuss their concerns relating to the sawmill and its upgrade and were made aware of the CER on the proposal. Records were made of the concerns of each person during the visits and a summary of these is presented in the CER.

A public meeting was also called by the Chairman of the EPA in order to provide further opportunities for the community to express their concerns regarding this proposal. The issues raised at this public meeting have been considered during the assessment of this proposal.

Environmental issues raised in public submissions and at the public meeting related to noise emissions, log truck traffic, smoke and dust emissions, kiln fires, chemical spills, groundwater usage/contamination, waste disposal, odour emissions, copper chrome arsenic plants and the use of blue gums. Concerns were also raised about potential buffer zones. Further social issues associated with the proposal were also raised.

The questions asked of the proponent, and the proponent's responses are given in Appendix 2.

## **4. The existing environment**

The existing sawmill is located within the Shire of Dardanup on Location 317 which was zoned partially to General Industry and partially to Recreation in November 1979 (figure 1). The area zoned for recreation is currently planted with pine trees.

The sawmill site is defined as part of the Preston Industrial Park in the 1992 Report of the Advisory Committee on Industrial Sites in the South-West. The Preston Industrial Park is identified as being suitable for appropriate industrial expansion.

To the south (0.6km) of the sawmill is the Small Holding subdivision of Padbury Fields which was created in 1979 and now contains 50 lots including 34 with houses. The nearest house in this subdivision is about 830m from the present sawmill.

To the east (1km) and north of the sawmill is another Small Holdings subdivision, Coplestone, which was also created in 1979 and which now contains about 38 lots including 13 with houses.

The size of the lots in Padbury Fields and Coplestone are generally between 2 and 3ha. Permitted uses in these Small Holdings are single dwellings and horse stables and various other activities which may be specifically approved by Council (Shire of Dardanup). These activities include home occupations, forestry, bee-keeping, plant nurseries, dog kennels, and art and craft studios.

There is a sandpit adjacent to the sawmill on Busher Road. The owner of this sandpit lives in a house on site. This issue will need to be managed by the proponent in order to prevent future conflicts.

Much of the land surrounding the sawmill site is zoned general farming although some lots have been zoned for subdivision. These areas are subject to provisions in the Dardanup Pine Log Sawmill Agreement.

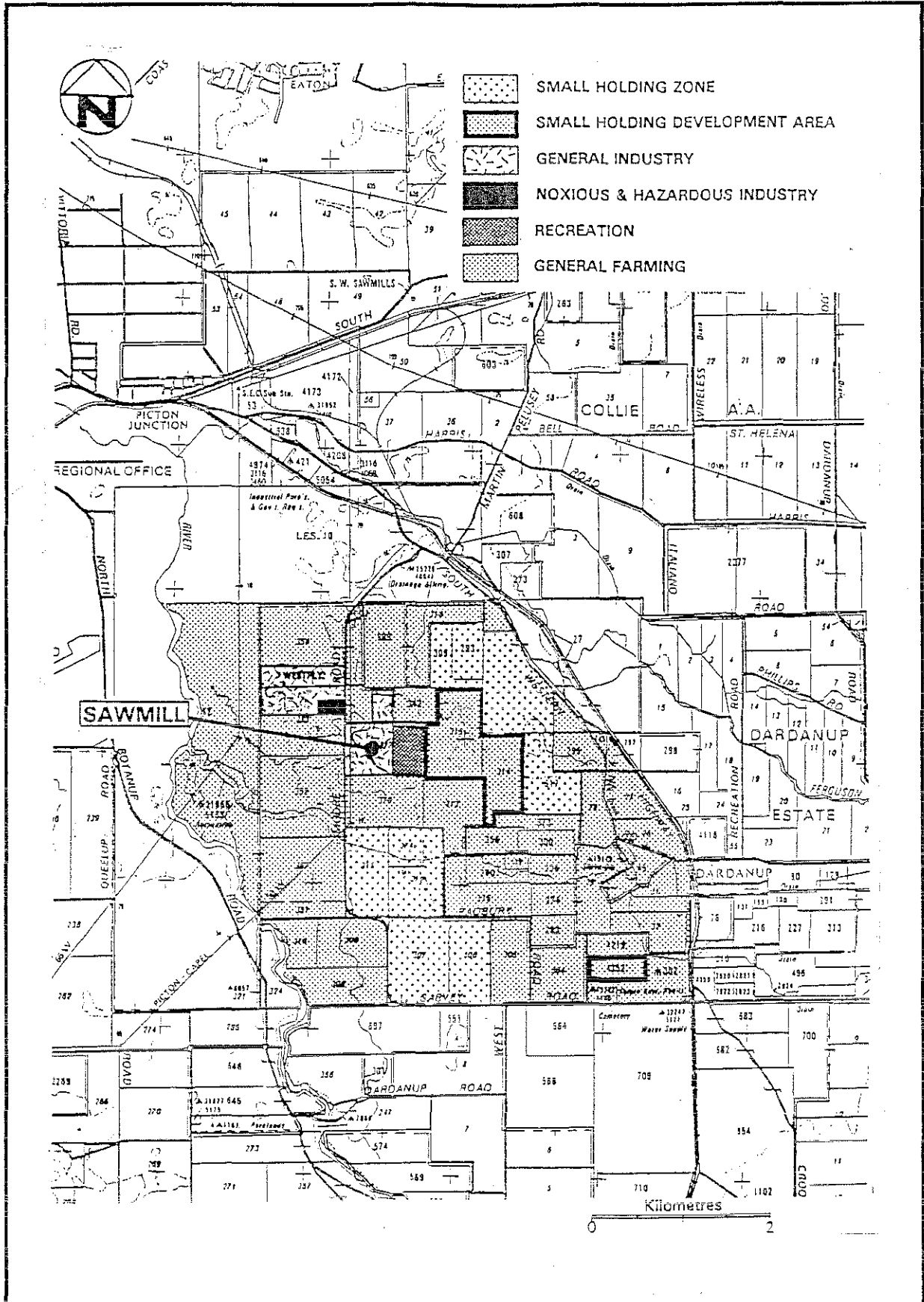


Figure 1: Shire of Dardanup Zoning Plan

## 5. Dardanup Pine Log Sawmill Agreement Act 1992

A formal contract in the form of an Agreement between Wespine and the Government of Western Australia has been proclaimed. Under this Agreement, it is intended that the State will be assured of a market for 5.5 to 6.0 million m<sup>3</sup> of softwood sawlogs grown in its plantations and Wespine will be guaranteed security of the sawlog resource.

The Agreement also covers a range of other issues that are considered important to both the State Government and the proponent. The full range of issues addressed in the Agreement are as follows:

- use of local labour, professional services and materials;
- supply of timber;
- use and maintenance of roads;
- provision of services;
- zonings of surrounding land; and
- protection and management of the environment.

The Agreement does not exempt Wespine from a statutory obligation to obtain a separate approval from the Minister for the Environment for the proposed expansion of the sawmill and the Agreement will not come into effect unless environmental approval is granted.

## 6. Buffer zone

A major issue for this proposal is that of the provision of a secure buffer zone.

With an appropriate buffer zone, issues such as noise emissions, dust and smoke emissions, odours and groundwater contamination are more easily managed to acceptable levels.

In order to be effective, however, it is necessary to limit activities within buffer zones to those which can operate in harmony with industry as well as with more sensitive adjacent land uses such as residential. Such activities could include light industry, general farming, conservation purposes or agroforestry.

The proponent has no control over any of the land surrounding the sawmill and therefore cannot directly establish buffer zones.

In the Dardanup Pine Log Sawmill Agreement Act 1992 it is proposed that land within approximately a 600m radius of the sawmill should not be rezoned without the specific approval of the Minister for Planning. The Agreement states that the zoning of the subject land *"shall not be changed during the currency of the Agreement to a zoning that is determined by the Minister for Planning, after consultation with the Minister and the relevant local authority to be incompatible with or likely to restrict or adversely affect the activities of the company under this Agreement"*.

In this Agreement the Minister for Planning also may extend the above condition to a larger area of land. This possible extension is shown in Figure 2.

However current zoning still allows for the construction and habitation of residential dwellings on the land referred to in the Agreement.

**Environmental impacts resulting from the sawmill expansion will have to meet acceptable levels at the nearest residence. If further residential development occurs then the proponent will be required to meet the necessary levels at those locations. Accordingly the EPA points out the implications of changing land uses around the plant on the operations of the sawmill. It is the opinion of the EPA that if any house is built close to the proposed expanded plant, that the plant will not be able to meet the noise constraints — either adequate arrangements need to be made to prevent houses being built in this area, with attendant issue of compensation, or the expansion should be opposed.**

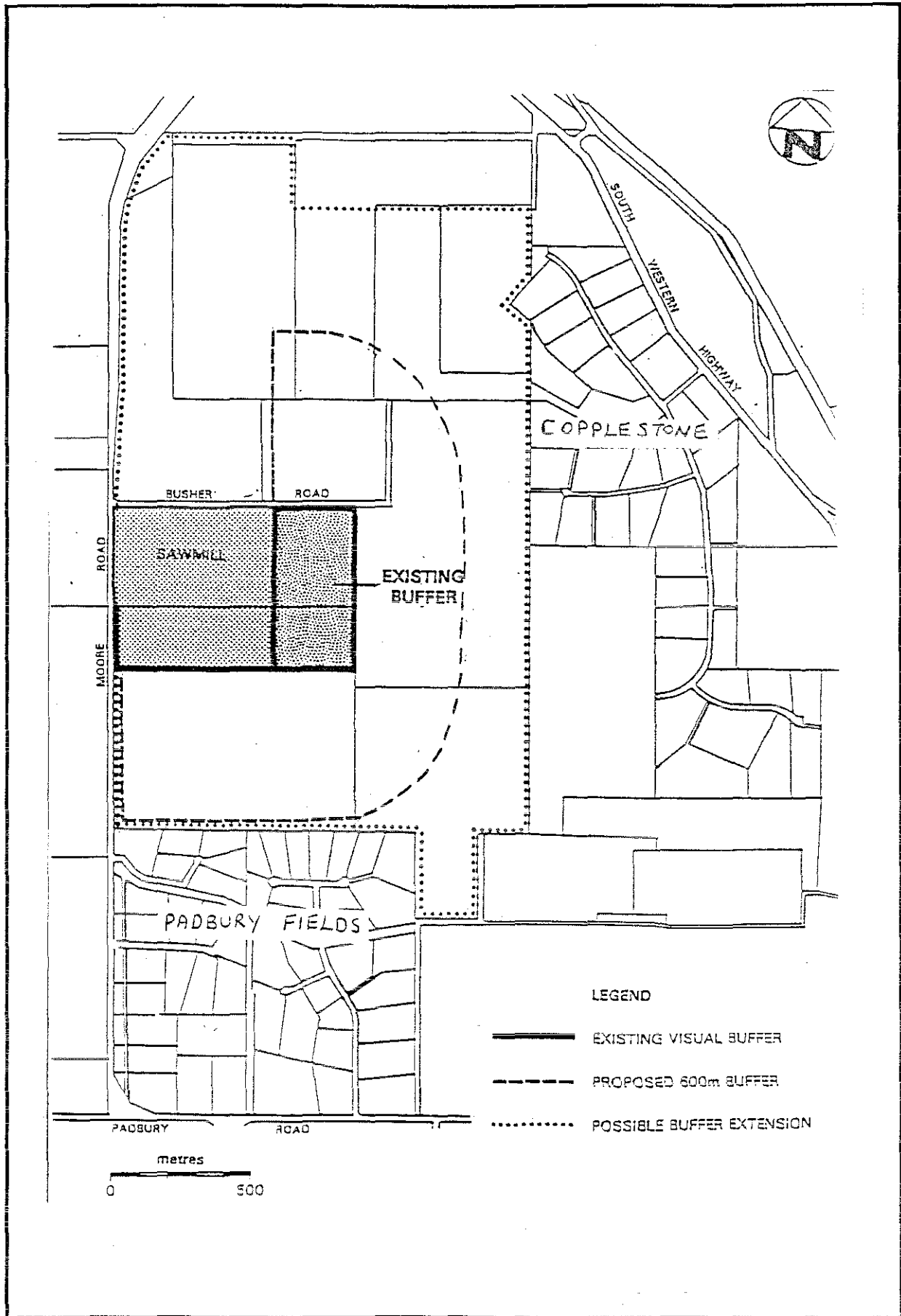


Figure 2: State Agreement Act — Proposed Buffer Zones

## **7. Environmental impacts and their management**

Following a review of the environmental aspects of the proposal and taking into account submissions from the public and Government agencies, the Environmental Protection Authority concludes that the proposal would be environmentally acceptable subject to a number of conditions as discussed in the following sections of this report.

In reaching its conclusion, the EPA identified the main environmental issues as:

- potential for noise to upset nearby residents;
- dangers associated with increased log truck traffic; and
- the risk of groundwater usage/contamination.

The EPA identified the issue of a buffer zone as being critical for this proposal. Other issues identified during the public review period included:

- the possible relocation of the sawmill;
- annoyance from smoke and dust emissions;
- dangers associated with kiln fires;
- the risks associated with chemical spillages;
- odour emissions;
- copper chrome arsenic (CCA) plant contamination;
- the potential for lighting overspill to upset residents;
- adverse effects upon land values in the area; and
- negative effects upon the lifestyles within the surrounding areas.

The Authority is confident that many of the environmental issues can be managed through good plant practices. Based on available evidence, noise emissions should be manageable to acceptable levels at nearby residential areas. However the expanded activities of the sawmill will affect future land uses in the area.

Based on its assessment of the proposal and additional information provided by the proponent in response to questions raised as a result of the assessment process, the EPA makes the following recommendations:

### **Recommendation 1**

**The Environmental Protection Authority concludes that the proposal by Wespine Industries Pty Ltd to expand its pine log sawmill operations, as outlined in the Consultative Environmental Review, is environmentally acceptable.**

**In reaching this conclusion, the Authority identified the main issues requiring detailed consideration as:**

- buffer zone**
- noise emissions**
- increased log truck traffic**
- groundwater usage/contamination**
- public liaison**

**The Environmental Protection Authority considers that these issues have been addressed and are manageable, either by the environmental management commitments given by the proponent, or by the Environmental Protection Authority's recommendations in this report.**

## 7.1 Noise emissions

Noise modelling undertaken by the proponent indicate that under certain conditions noise emissions from the sawmill would exceed the EPA noise requirements at the nearby areas of Padbury Fields and to a lesser degree at Copplestone. The monitored levels and the computer modelling show that noise emissions from the existing sawmill generally comply with the EPA policy for daytime levels at these areas.

When the expanded sawmill moves to operations on afternoon shift, there will be a requirement that the noise levels at the nearest residence is no more than 40 dB(A) during certain times of the afternoon shift.

In order to assess existing noise levels, specific measurements were taken over several days around the sawmill and at a number of locations within Padbury Fields and Copplestone including some of the nearest residences to the mill.

Various modelling runs were undertaken to develop noise contours with different meteorological conditions. The proponent determined that the worst case scenario for Padbury Fields was during periods when a northerly wind of  $3\text{m s}^{-1}$  was present. In order to comply with the EPA noise requirements various strategies have been identified which when implemented will ensure compliance with the EPA noise requirements. It is proposed that noise levels at Padbury Fields will be reduced to well below the maximum night time criteria of 40 dB(A). These measures are expected to significantly improve noise levels compared to those which currently exist.

The EPA considered that the noise modelling undertaken for the CER was inadequate in that sufficient consideration had not been given to potential noise levels under a much wider range of meteorological conditions. This applied particularly to winds emanating from the south west which have the potential to increase noise levels in the Copplestone area. This shortcoming was also highlighted in many submissions received by the EPA. The EPA requested that further work be undertaken in this area. This was required in order to ensure that appropriate noise measures could be implemented which would ensure compliance with the noise requirements under all meteorological conditions. This work has been completed and the EPA are satisfied that sufficient modelling has been undertaken to account for the anticipated meteorological conditions for the area. A compilation of modelling data for predicted noise levels (40 dB(A)) for the surrounding areas is presented in appendix 4.

The expansion of the sawmill will enable a significant reduction in the existing noise levels as a result of the installation of new equipment and other specific noise control measures. The proponent's proposal includes upgrading and replacement of existing equipment in a manner which will allow for the compliance with the EPA noise requirements at the nearby rural subdivisions of Padbury Fields and Copplestone. The proponent's strategy on noise management has, to this stage, centred around meeting EPA noise criteria at the subdivisions of Padbury Fields and Copplestone. This approach may prove unsatisfactory in the future as the current zoning of land surrounding the sawmill allows for further residential establishment.

**The EPA has established a number of environmental criteria (eg for noise impacts) which are to be met at the residence nearest to an industrial facility. This approach will be used in this case. Should further residential development occur at locations closer to the plant then the proponent will be required to meet the necessary criteria at those locations.**

### Recommendation 2

**The Environmental Protection Authority recommends that the proponent should construct and operate the proposal so that combined noise emissions from the site do not unreasonably impact on the surroundings.**

**The Environmental Protection Authority recommends that the proponent should ensure that noise emissions do not exceed at the nearest house:**

- (1) the ambient noise level present at any time by more than 5 dB  $L_A$  slow; and**



- (2) • 40 dB  $L_{A10}$ , 1 hour slow between 2200 hours and 0700 hours on any day;
- 45 dB  $L_{A10}$ , 1 hour slow between 1900 hours and 2200 hours on any day, and between 0700 hours and 1900 hours on Sundays and gazetted public holidays;
  - 50 dB  $L_{A10}$ , 1 hour slow between 0700 hours and 1900 hours on Monday to Saturday inclusive; and
  - 65 dB  $L_A$  slow when measured at other industries.

The Environmental Protection Authority recommends that the proponent should ensure that noise emissions from those activities which are of concern to occupiers of noise sensitive premises do not exhibit tones, amplitude and frequency modulation, and impulsiveness of a nature which increases the intrusiveness of the noise.

## 7.2 Log truck traffic

The main access to the sawmill site is Moore Road which is a 6 to 7m wide sealed carriageway. Moore Road serves as a link through from Garvey Road to the Picton-Boyanup Road and consequently many local people use it to travel to and from Bunbury. The section of Moore Road south of the Picton-Boyanup Road is unzoned and subject to a speed limit of 110 km/h.

Trucks carting pine logs and finished products use regional roads to gain access to and from CALM forests and Perth respectively. In the future it is expected that approximately 70% of the pine log trucks will use the Picton-Boyanup Road which translates to 34 additional truck movements. The remaining 30% will be along Martin Pelusey Road to access the south-western highway north which represents 14 movements per day. Residue trucks only operate between the sawmill and the particle board plant and thus do not use regional roads. In addition to log truck traffic there are other truck and car traffic movements along Moore Road.

The commitments given by the proponent (incorporating commitments by CALM) reflect the need to ensure that the impacts associated with the increased trucking will be managed in an environmentally acceptable manner.

The issue of safety along Moore Road has been raised as being very important by many residents. The proponent and CALM have committed (see commitments 7,12 and 13) to various strategies which will be undertaken in consultation with the Main Roads Department in order to reduce the potential for traffic accidents along Moore Road. The EPA is satisfied that if implemented, these measures will assist in alleviating the dangers associated with the anticipated log truck traffic along Moore Road. However the Authority considers that in formulating and implementing these strategies, the wider road network beyond Moore Road should also be included as appropriate.

## 7.3 Groundwater usage/contamination

Advice from WAWA indicates that the installation of an additional bore to extract 260,000 kL/annum should not have significant implications. It is probable that the additional bore would be sunk into the Yarragadee Formation to ensure that it does not interfere with the existing bore in the Leederville Formation. WAWA require that this bore be licensed and thus the proponent will need to prove to WAWA that it will not interfere with other bore water users.

Trenches on site act to intercept the uppermost part of the superficial aquifer and these waters are being monitored by WAWA.

There has been some concern raised by WAWA relating to the paucity of water quality data, upon which the proponent has based its predictions regarding the lack of impacts on the surface drainage and shallow groundwater aquifer. WAWA are of the view that there is a need for a monitoring programme which will determine both the qualitative and quantitative effects of the proponent's activities upon the water resources of the area.

**The Company has made a commitment (number 11) that it will meet the requirements of WAWA in preparing and implementing a water monitoring programme.**

#### **7.4. Community issues**

There has been considerable concern expressed by the community with respect to the social issues associated with this proposal. In particular, concern has been expressed with regard to proposed buffer zones and the acquisition of properties.

There has also been considerable disillusionment expressed by sections of the community regarding the lack of open discussion between the proponent and residents of Padbury Fields and Coplestone. Despite a survey being conducted by the proponent the residents initiated another survey at their own cost. Further use of the Social Impact Unit resources may have provided the necessary conduit for the facilitation of productive interaction and consultation between the proponent and the community. Developers and communities likely to be affected by development must be encouraged to fully utilise such services as those provided by the Social Impact Unit.

In order for meaningful dialogue to continue throughout the staged expansion of the sawmill it appears that a liaison committee needs to be established. This committee is required in order to provide the necessary forum for open discussion and consultation on the issues associated with this project.

**The Company has made a commitment (number 4) that it will establish a community liaison committee to the satisfaction of the EPA.**

#### **7.5 Relocation of sawmill**

Wespine was asked to examine the viability of relocating the sawmill to Lot 354, Moore Road Dardanup by members of the group representing Coplestone and Padbury Fields residents and by the Dardanup Shire Council.

Wespine have advised that the engineering and financial assessments indicate that the costs are prohibitive with regard relocation of the sawmill.

#### **7.6 Smoke/dust emissions**

The mill has generated smoke in the past when piles of residual material were burnt on site.

There is the potential for the generation of fugitive dust as a result of the movement of logs and log trucks around the sawmill site.

**The Company has given a commitment (number 5) to manage the issue of dust. Smoke should not cause any environmental impacts, however, should any problems occur the EPA will enforce the appropriate standards.**

#### **7.7 Lighting overspill**

There is the potential for light spill from the sawmill given that it will be operating after daylight hours.

**The EPA is satisfied that with the commitment (number 6) given by the proponent that the issue of lighting overspill will be managed in an environmentally acceptable manner.**

## **7.8 Other issues**

Other issues raised during the public review period include kiln fires, chemical spillages, odour emissions, copper chrome arsenic contamination and the use of blue gums at the sawmill. The EPA believes that these issues have been adequately addressed and are not considered to have the potential to significantly impact upon the environment.

## **7.9 Time limit for approval**

The EPA considers that any approval for the proposal based on this assessment should be limited to five years. Accordingly, if the proposal has not been substantially commenced within five years of the date of this report, then such approval should lapse. After that time, further consideration of the proposal should occur only following a new referral to the EPA.

The EPA notes that during the detailed implementation of proposals, it is often necessary to make minor and non-substantial changes to the designs and specifications which have been examined as part of the EPA's assessment. The EPA considers that subsequent statutory approvals for this proposal could make provision for such changes, where it can be shown that the changes are not likely to have a significant effect on the environment.

## **8. Conclusion**

Based upon the information supplied in the CER and additional information supplied by the proponent during the assessment, the Environmental Protection Authority has concluded that the proposal to expand the pine log sawmill, Moore Road Dardanup, is environmentally acceptable.

In reaching its conclusion, the EPA identified the main environmental issues as noise emissions, increased log truck traffic and groundwater usage/contamination. The EPA identified the issue of a buffer zone as being critical for this proposal. Other issues identified during the public review period included the relocation of the sawmill, smoke and dust emissions, kiln fires, chemical spillages, odour emissions, copper chrome arsenic (CCA) plant contamination and lighting overspill. There were many social issues raised during the assessment of this proposal. These included the subdivision rights of landowners, lifestyle preservation and the devaluation of properties.

Accordingly the Environmental Protection Authority recommends that the proposal can proceed subject to the proponent's commitments (Appendix 1) and the Environmental Protection Authority's recommendations in this report.

## **9. Reference**

Alan Tingay and Associates, 1992. Proposed Major Staged Expansion of Pine Log Sawmill, Moore Road Dardanup.- Consultative Environmental Review

# **Appendix 1**

**Environmental management commitments  
made by Wespine Industries Pty Ltd**

1. The proponent will comply with EPA noise regulations and will carry out further noise reduction measures if necessary to ensure compliance with EPA regulations.
2. The proponent will ensure that the sound output levels of all new equipment purchased for the sawmill will allow ongoing conformance to EPA Regulations.
3. The proponent will conduct a monitoring program for noise to the satisfaction of the EPA.
4. The proponent will, with the co-operation of others, establish a community liaison committee. This committee shall be established prior to the commencement of Stage 1 and be to the satisfaction of the EPA.
5. The proponent will continue to water pine logs stored within the mill site to ensure that fugitive dust levels do not create a nuisance.
6. The proponent will prepare and implement a lighting strategy to the satisfaction of the EPA.
7. The proponent commits to seek and co-operate with the implementation of the following measures designed to minimise traffic hazards that relate to the sawmill on Moore Road:

Reduction in the speed limit to 80kph.

Kerbing and sign posting with stop signs at all access points and side roads.

Removal of vegetation and fences that currently restrict sight distances near exits from the sawmill, particle board plant and resin plant.

If agreed by the Department of Main Roads and Shire of Dardanup, these measures will be implemented as soon as possible.

8. The proponent will plant and maintain a visual buffer of vegetation 20 to 30m in width around the southern and western portions of the sawmill site's periphery.
9. The proponent will take the necessary steps to ensure that the sawmill site is free of chemical contamination in accordance with the then prevailing standards once the current use of the site has ceased.
10. The proponent will investigate the economic feasibility of constructing a residues pipeline to the particle board plant when log intake to the sawmill reaches 200,000m<sup>3</sup> per annum.
11. The proponent will prepare and implement a water monitoring program to meet the requirements of WAWA.

In addition, the Department of Conservation & Land Management (CALM), which will be responsible for the supply of pine logs to the Dardanup mill, makes the following commitments as part of this CER:

12. CALM will ensure that all of its operations relating to the supply of pine logs to the Dardanup sawmill are in accordance with the provisions of the Conservation and Land Management Act, 1984 and Regulations thereto, and with all relevant approved and then current Forest Management Plans.
13. CALM will ensure that road haulage contractors employed by CALM involved in the transport of the logs to the Dardanup sawmill receive specific direction on the routes to be used between each plantation and the mill, together with the need to comply with any conditions on the use of any route determined by the Main Roads Department or a Local Authority in accordance with their respective statutory responsibility or power.

## **Appendix 2**

**Responses by Wespine Industries Pty Ltd to issues raised in public submissions on the Consultative Environmental Review**

QUESTIONS FROM SUMMARY OF PUBLIC SUBMISSIONS  
MAJOR STAGED EXPANSION OF PINE LOG SAWMILL, DARDANUP

1. NOISE

1.1 Why has no noise monitoring been conducted in the Coplestone area? Noise monitoring has been conducted in the Padbury Fields area assuming that is where the problem will always be. Will there not be noise emissions detected at Coplestone during period with south westerly winds?

Monitoring was undertaken in the Coplestone area at the Southern end of Harold Douglas Drive. It was assumed that Padbury Fields was the most critical area and thus this received the most attention initially.

However, subsequent modelling has shown that a noise problem could exist at Coplestone under down wind propagation. The noise sources responsible for the higher levels at Coplestone were identified as emissions from openings in the southern side of the Green Mill and Dry Mill. Noise control of these sources is proposed to allow night time operations where less than 40 dB(A) is required in Coplestone. The results of these predicted levels is shown on Drawing 92056/06 (Appendix 4).

It should be noted that Drawings 06 & 07 show the 40 dB(A) contour for maximum propagation in all directions. The drawing represents worse case conditions simultaneously for all wind directions.

1.2 Why has the proponent not properly covered a full range of wind directions and conditions during the noise modelling exercise? Similarly, why haven't different seasonal patterns been considered?

Refer to the answer to Question 1.1

Seasonal patterns will not affect the level of noise propagation only the frequency of occurrence.

1.3 Does the company consider that one week's combined noise emissions from the particle board plant and sawmill is enough to accurately determine the noise present throughout the area?

The monitoring undertaken is considered adequate. Modelling is performed on the basis of worst case weather conditions and the noise output from each noise producing element at the sawmill. Noise monitoring is used to confirm that the modelling is accurate. Thus monitoring does not need to be performed for long periods in order for modelling to accurately predict the noise that would be present year round.

1.4 With reference to weather conditions and operating modes of the particle board plant and sawmill why was the noise consultant so selective with data?

All data collected from the monitoring programs have been utilised in the assessment of the potential noise impacts from the sawmill and particle board plant.

1.5 Based on the proponent's CER, has the particle board plant or sawmill infringed the legal noise limits?

The particle board plant has not been assessed for compliance with the Regulations. The sawmill does comply with the Regulations with its present operation.

1.6 Has the cumulative noise the potential to sterilise the adjacent properties for development?

The use of adjacent properties will be governed by Regulations pertaining to noise and the requirements of the Minister for Planning. It is considered that a range of land uses such as forestry, agriculture and light industrial uses would be suitable for adjacent properties.

1.7 During the period of L Storer's monitoring, were sections of the particle board plant subjected to part closure or shut down? If so, over what time periods did this occur (dates and hours)?

During the monitoring period, the particle board plant was shut down as noted in the CER. At all other times the plant was considered to be operating normally.

1.8 Would seasonal shifts in birth cycles associated with living entities such as insects, frogs and birds require investigation for an accurate assessment of 'existing' and 'expanded' noise projections?

Noise from insect, frogs etc. do not affect noise emission from the sawmill. It does, however, make it difficult to monitor the actual level associated with the sawmill alone. This can be done by frequency analysis which was part of the assessment process for the CER.

1.9 Would long term independent noise monitoring be seen as a more impartial context for scientific analysis?

Noise monitoring was carried out to assess the noise emission from the proposed expanded sawmill and as part of a program to ensure that these emissions comply with the Environmental Protection Authority Regulations. Extensive monitoring of any form will not alter this.

1.10 Is the value of the noise study limited in any way by the lack of a social and cultural index of values that may exist in the Padbury Fields/Copplestone area?

No. The noise levels developed by the EPA and which the proponent is required to conform to have been derived on the basis of social and cultural index values, i.e. the noise regulations take into account such factors.

1.11 Is the value of the noise study limited in any way due to the value of the wind speed factors chosen?

Wind speeds were selected to predict maximum noise level propagation. Sound propagates more down wind than up wind or in calm conditions. Above about 3 metres per second (m/s), the wind itself creates noise through trees, around houses etc. 3 m/s therefore is considered a reasonable criterion for assessment.

1.12 Is it important that noise foot printing be considered for conditions of maximum noise associated with all possible wind directions?

Refer to the answer to Question 1.1

1.13 Why was a wind speed of 3m per second chosen over other possibilities? (Reference Appendix "E" CER).

Refer to the answer to Question 1.11

1.14 Noise contour predictions are based on the existence of the pine trees on the southern boundary. The CER states that these trees will be removed. What effect will this have on the noise contours?

The proponent does not propose to remove all the trees within the southern planted area and has committed to maintaining a 20-30m buffer of vegetation along the southern border of the site. It is the opinion of the noise consultant that this clearing is insufficient to influence the noise contours generated by modelling to date.

1.15 Can the noise levels recorded on 9 July 1992 during a light east-north-east wind be considered as a worst case example?

It is reasonable to expect this to be indicative of maximum propagation to Padbury due to:-

light down wind propagation.

the levels being described by residents as an extremely loud period ("loudest morning during the monitoring").



1.16 Weather data for noise monitoring was obtained from the power station charts. Can weather data vary between the power station and Padbury Fields?

The wind data from Bunbury Power Station can be taken as indicative of prevailing conditions, however, it is possible for strength and direction to be different at Padbury.

1.17 Can WESPINE state 'for certain' that a mixed use buffer on Lot 316 in the form of light industry will not increase the cumulative noise already experienced by residents during the past 12 years.

The proposal referred to the EPA does not include the development of Lot 316 for light industrial purposes and the proponent does not own Lot 316. Thus it is not in a position to comment on the noise that would be generated in any such development.

1.18 Is WESPINE aware of the actual number of residents in the area who work shift work and attempt to sleep during the day?

WESFI are aware that shift workers live in the Small Holdings Subdivisions of Padbury Fields and Copplestone, though they make up a relatively small proportion of the total number of residences. Residents of these subdivisions wishing to sleep during the day will not be disadvantaged by the proposal since noise from the sawmill will actually reduce during daylight hours as a result of the expansion.

1.19 Has an environmental impact study been carried out on the effects that a light industrial area will have on the flora and fauna of Lot 316?

No environmental impact has been carried out on the effects that a light industrial area will have on the fauna and flora of Lot 316. Light industrial development is not part of the proposal described in the CER on the sawmill upgrade.

1.20 With reference to the residents survey is WESPINE aware that 65% of the respondents were concerned about the removal of the pine trees to the south of the mill?

The pine trees to the south of the sawmill are a commercial plantation planted to provide softwood timber to the particle board plant and sawmill. Unlike pine trees to the east of the sawmill, they were not planted as a visual buffer. The eastern buffer zone trees were planted to meet a requirement of the Dardanup Shire Council at the time of rezoning of the site. WESPINE understands that residents may be concerned with the visual impact that the existing and proposed plant may have and consequently have committed to maintaining a visual buffer around the southern, western and eastern boundary of the site. This buffer may include pine trees and thick plantings of native vegetation.

1.21 Why are the projections of noise based on the sawmill operation only rather than on the particle board, Dyno and sawmill plant collectively as noise levels are cumulative?

This approach was taken because it is the sawmill that is undergoing expansion and for which the CER was prepared. Further, a cumulative effect with ambient levels has been addressed in the CER in the noise report in the Appendix.

1.22 Is the company prepared to give commitments to a noise reduction programme at the particle board plant?

The proponent is not in a position to make commitments regarding the particle board plant. However, WESFI have written to the EPA undertaking to reduce the level of noise generated from the particle board plant and this letter is appendicised in the CER. WESPINE understand that this programme has commenced.

1.23 Has the proponent considered the noise emissions from the proposed sandblasting operation on Moore Road during the noise modelling exercise?

No the proponent has not, since this is currently only a proposal.

1.24 Does the company intend to process hardwoods on the sawmill site in the future, and if so, what would be the additional noise associated with such a venture?

The Company has not assumed in any of its planning that it will be processing hardwoods through the sawmill.

1.25 Why hasn't WESPINE invested in noise abatement measures before the proposed expansion was announced?

Because the mill complies with the Regulations as it stands.

1.26 There is a concern that emphasis should not be put on noises from frogs and birds, during assessment, as these are part of the rural environment compared to the annoying industrial noise from the sawmill and adjacent industries.

Emphasis was not put on birds, frogs and other ambient noises, however, it was necessary to address this matter as they significantly contribute to ambient levels.

1.27 Is WESPINE aware of the current disturbances caused by the noise of the kiln, the crashing of logs, log trucks, saws, the beeping of the reverse signals, telephones and 2-way radios?

The proponent was made aware of these disturbances through its public consultation programme. These have been noted also by the noise consultant in his noise assessment of the sawmill.

1.28 Could the company give a commitment to employ sound reduction techniques to reduce maximum noise emissions from the particle board plant to a level of 35 dB(A) during periods of north easterly winds?

This issue is dealt with in the response to Question 1.22

1.29 Is any additional noise monitoring data for the area available?

Some spot level measurements were made by a previous noise consultant and these were considered as part of the current study.

1.30 What noise attenuation works will be carried out within each stage of the expansion?

Noise attenuation would be implemented at each stage of the project as required to ensure that EPA regulations are conformed to, and particularly as equipment is installed.

## 2. Log Truck Traffic

2.1 Prior to the construction of a residue pipeline, how will the traffic/resident problem be managed?

WESPINE has made commitments in the CER that it will approach the Main Roads Department about the problem. Part of this liaison will involve a recommendation to reduce speed limits in the area, the use of median strips etc. It also needs to be recognised that the Preston Industrial Park Structure Plan addresses this question by recommending that Moore Road be truncated at the sawmill, thereby separating completely residential traffic and industrial transport of all types.

2.2 When the proponent considered the increase in truck traffic on Moore Road why didn't they compare increased weight rather than number, as fully laden WESPINE trucks weigh up to 60 tonnes compared to farm trucks which only weight 2-3 tonnes?

Details have been given on the carrying capacity and types of vehicles to be utilised in the upgrade and this information has been considered in the assessment of potential impacts associated with the sawmill upgrade. These are described on page 25 of the CER.

2.3 Why hasn't the effect of truck accidents been considered in the CER (2 at Boyanup recently)?

The proponent is most aware of the potential for accidents involving contractor's vehicles on local roads. A reduction in this potential has been the prime motivation for the traffic control mechanisms described in Section 3.3.4 of the CER.

2.4 Why hasn't the study of Martin Pelusey and Picton Boyanup Roads been included in the CER?

The impact of the expansion of the sawmill with regard to traffic has been considered for Martin Pelusey and Picton Boyanup Roads. This issue is addressed on page 29 of the CER. A comprehensive traffic study was performed as part of the review of environmental impacts from the project. This study was documented by Cossill & Webley Consulting Engineers, however, it was not included in the CER due to its volume. The report was made available at the Dardanup Shire Library for inspection in conjunction with the CER over the public review period.

2.5 Why hasn't the proponent considered the cumulative effect of traffic, ie. other industries?

The volume of traffic currently using local roads was taken into account in computing the potential impact of traffic associated with the expansion of the sawmill. This volume included traffic that originated from industries and residential developments in the area. Although these have not been presented in the CER they are considered in the road traffic study commissioned as part of the investigation into impacts associated with the sawmill expansion. It is important to note that all increases described in the CER are presented as percentage increases over existing traffic. Reference should be made to Section 3.3.3 of the CER.

2.6 What action is the proponent undertaking to alleviate the current dangers to motorists on Moore Road as a result of trucks associated with the sawmill?

This issue is dealt with in the response to Question 2.1.

2.7 In order to prevent further traffic problems why can't a spur be run-off the main railway line which is within 5 km of the sawmill?

The use of rail transport would render the entire project uneconomic. The cost of constructing a spur line, the additional costs at both despatch and destination, the cost of constructing a spur line at the delivery end and the multiple handling of product (with increased possibility of product damage) would make the Company unable to compete against other timber producers and alternative products. A further major disadvantage would be the inability to deliver product direct to a customer's premises. It is the Company's aim to deliver direct as much product as possible because this eliminates any double handling at its metropolitan store.

2.8 WESPINE has given no time schedules for the implementation for proposed changes to improve the safety of Moore Road.

No timelines have been produced because the time of the Minister's approval for the proposal is not known. When approval is granted to proceed with the project, discussions will commence with the Main Roads Department. The timing will then be dependent upon the works programme of the Main Roads.

2.9 The existing traffic problems could be solved if Moore Road were blocked off at Padbury Road and Padbury Road extended across the Preston River to join up with the Boyanup Road. Could the company make a commitment to pay a share of the costs associated with such an extension?

The Preston Industrial Park Structure Plan suggests that the truncation of Moore Road would be the best solution for separating residential and industrial traffic. The cost of major variations to the local road network is not the province of individuals or individual companies. When surrounding land is zoned as light industrial, for example, each individual landowner is not expected to pay part of the costs of the road network. The cost of infrastructure is part of the overall cost to Government.

2.10 Was the traffic study undertaken by Cossill and Webley carried out on the assumption that the residue pipeline was constructed? If this was the case will WESPINE commission another traffic study which more accurately reflects the situation?

The traffic study undertaken by Cossill & Webley assumed that a residue pipeline would come into operation when the plant reached approximately 200,000 m<sup>3</sup> of log input per annum.

The proponent considers that a residue pipeline will become economically feasible at around the 200,000 m<sup>3</sup> intake. The number of vehicle movements per day that will result from the operation of the sawmill in the medium, long term and current situation is presented in Table 4 of the CER. In the medium term, no pipeline is considered, however, in the long term it is considered that a pipeline will be operating. The proponent feels that this situation is a realistic prediction of the expansion and therefore an additional traffic study is not warranted.

2.11 Will the intersections of Moore Road and Picton-Boyanup Road and Picton-Boyanup and Martin Pelusey Road meet Austroads recommendations for predicted traffic volumes?

The intersections of Moore Road and Picton-Boyanup Roads and Picton-Boyanup and Martin Pelusey Roads are the responsibility of the Dardanup Shire Council and the Main Roads Department. It is the responsibility of these authorities to ensure that the roads in the area meet the relevant standards. WESPINE has committed to liaise with these two authorities regarding the design of roads and WESPINE traffic.

### 3. Buffer Zone

3.1 Has WESPINE considered the costs associated with staying on their present site, which may have an inefficient buffer?

The proponent has considered all costs associated with minimising the impact of its operations with regard to the existing and proposed plant on neighbouring residents. The current distance between the sawmill and residents is considered to be sufficient to maintain environmental engineering costs at a level that maintain the attractiveness, in a financial sense, of the present site.

3.2 The Chappell and Lambert report 1992 highlighted the need for a buffer of 1 km. Why has WESPINE ignored this advice and pursued a buffer ranging from 560m to 1.25 km?

The Chappell and Lambert report, 1992 was written as a submission to the Dardanup Shire Council regarding the proposed subdivision of land adjacent to the sawmill site. The authors were not in a position to consider the range of options available to WESPINE with regard to the minimisation of environmental impacts of the sawmill operation on existing residents. In the absence of these options it was considered that the expanded sawmill may have needed a buffer in the order of 1 km. See also the response to Question 3.17.

3.3 Is Chappell and Lambert's (January, 1992) advice to the proponent, to ensure a minimum 1 km "area of influence", appropriate?

Refer to the answer to Question 3.2

3.4 Why is there no mention of documentation of a buffer zone to the west of the sawmill and particle board plant?

A buffer zone is required where potential land uses could interfere with the operations of industry. This is the case to the east, south and north of the sawmill. The subject of the particle board plant is not within the scope of the CER.

3.5 When will the Minister for Planning establish the buffer and who will purchase it as the State Agreement and the Preston Industrial Park Study have conflicting buffer zones?

The Minister for Planning is not required to establish a buffer. The Minister's role is described in Clause 18 (2) (a) of the State Agreement. The Agreement Act will establish that the lands coloured Blue referred to in the Agreement shall not be rezoned to a zoning that is determined by the Minister for Planning to be incompatible with or likely to restrict or adversely affect the activities of the Company under the Agreement.

Clause 18 (3) provides that the lands the subject of Clause 18 (2) (a) & (b) may be resumed for the purpose of a buffer. However, the State has indicated that it will not be resuming the land for its own buffer purposes. Therefore any future consideration by the Minister for the creation of a buffer will be dependent on a request by the Company for the establishment of a buffer. If such is the case the Company will pay the cost of resumption. However the Company has no intention at this time to seek resumption for a buffer.

3.6 Will WESPINE consider Lot 316 as a recreational buffer in the form of Public Open Space?

The zoning of Lot 316 is General Farming and under the provisions of Clause 18 (2) (a) this zoning will remain unless otherwise changed by the Minister for Planning.

3.7 Has WESPINE considered the effects of a 1000m buffer zone on the rights of broadacre landowners?

Refer to answer for question 3.5.

The buffer zone around the Preston Industrial Park is not the responsibility of the proponent but rather is the responsibility of the Minister for Planning.

3.8 Is the proponent aware that within the 1 km proposed buffer that there are already 30 properties?

Yes.

3.9 Why wasn't there a permanent treed buffer 300m to the south similar to the one to the east?

The treed area to the east was a requirement of the Dardanup Shire Council as a condition of rezoning the land on which the sawmill is situated from General Farming to General Industry. Council did not require a permanent treed area to the south. The treed area to the south is a commercial pine plantation and at some time in the future it will be cleared. It is proposed that the majority of this area will ultimately be used in the expansion of the sawmill. However, the proponent has committed to maintaining a screen of vegetation along the southern, and western boundaries of the site which will be in the order of 20 to 30m wide.

3.10 Could the trees be left on the southern side and the equivalent be taken from the wider buffer on the eastern side?

Refer to the answer of Question 3.9.

3.11 Could trees be planted on the southern boundary for 40m and also on the land between Padbury Fields and the mill (Lot 316) before any expansion occurs?

WESPINE has made a commitment in the CER to plant a band of trees 20 m to 30 m wide around the southern boundary of the sawmill site. Lot 316 is not owned by the Company.

3.12 Given that there were no noise surveys undertaken in other areas why does WESPINE require a larger buffer zone to the east and north east compared with that required for Padbury Fields?

Noise measuring and modelling by Herring Storer Acoustics has shown that the topography of the area allows a smaller zoning restriction to the south than to the east and north east.

3.13 An amendment to a zoning of light industrial in the proposed buffer zone would be unacceptable to many residents.

Refer to the answer to Question 3.5

The proponent is not responsible for the zoning of land within the area coloured Blue referred to in the Agreement. This is a matter for the Minister for Planning and the Shire of Dardanup.

3.14 Rezoning to light industrial could cause stress to ground water resources in the area, through extra bores, septic tanks and the accompanying risk of pollutants entering the water table.

Refer to the answer to Question 3.13.

3.15 Has the proposed land use buffer been requested by the proponent on the premise that their significant expansion of timber processing requires it?

The proponent has always maintained that an appropriate area is required to insulate populated areas from the existing operations of the sawmill. This is particularly the case, given the presence of residential developments nearby and proposals for similar types of developments closer to the sawmill site.

3.16 Is the normal process, when obtaining land for a buffer zone, one of a commercial negotiation in providing the compensation for residents?

The proponent is under no obligation to acquire the land within the Blue area or the Brown area referred to in Clause 18 (2) of the Agreement. However, should the Company require a buffer it will seek to undertake commercial negotiations to acquire the land. Should commercial negotiations fail then the provisions of Clause 18 (3) of the Agreement may be adopted.

3.17 Is a buffer of 560m to the nearest resident (as recommended by State Development), a wise suggestion?

The proponent considers that a distance of 560 metres from the southern boundary of the sawmill to the northern boundary of the nearest resident is appropriate given the noise reduction measures that are to be employed in the sawmill upgrade and the favourable topography of the area immediately to the north of Padbury Fields.

3.18 Is the proponent's money being placed at risk if the nuisance level of the buffer is marginal?

It is not a question of the "nuisance level" associated with the Blue area referred to in the Agreement. The Blue area ensures that incompatible land use does not take place on the properties adjoining the sawmill. Risk, in this case, would be high if there were no Blue area and the adjoining land was zoned to an end use which was incompatible with a site zoned as General Industrial.

3.19 The CER does not provide a justification for the width of the buffer zone.

It is the responsibility of the Minister for Planning and the Dardanup Shire Council to provide an adequate buffer zone to ensure that the operations of industry within the Preston Industrial Park are not placed at risk through adjacent incompatible land use. Consequently it is not incumbent upon the proponent to provide a justification for the width of any buffer.

3.20 What would be the positive and negative social impacts of the establishment of the buffer as proposed by the company in its CER?

A buffer zone is not part of the proposal referred to the EPA and not the responsibility of the proponent. It is (correctly) the responsibility of the Minister for Planning.

4. State Agreement Act

4.1 Why has the State Agreement bill been rushed through Parliament?

The passage and content of the State Agreement Bill is not considered to be an issue that should be addressed in the Environmental Assessment process.

4.2 When the State Agreement bill has been passed will the residents have a right of appeal?

The passage and content of the State Agreement Bill is not considered to be an issue that should be addressed in the Environmental Assessment process.

4.3 Does the State Agreement bill allow for the resumption of farmland under the Public Works Act?

The passage and content of the State Agreement Bill is not considered to be an issue that should be addressed in the Environmental Assessment process.

4.4 Does the State Agreement bill allow for the selling or leasing of the resumed farmland back to the company?

The passage and content of the State Agreement Bill is not considered to be an issue that should be addressed in the Environmental Assessment process.

4.5 Does the State Agreement bill allow for the waiving of rights by landowners to the resumption and compensation of their land?

The passage and content of the State Agreement Bill is not considered to be an issue that should be addressed in the Environmental Assessment process.

## 5. Subdivision Rights

5.1 The proposed expansion will prevent many people from subdividing their land. How will the company address this issue?

The proposed expansion will be within land owned by the proponent and will not prevent people from subdividing their land. It is the responsibility of the Minister for Planning and the Dardanup Shire Council to address the issues of subdivision within the land under consideration as a buffer zone for the Preston Industrial Park.

## 6. Relocation of Sawmill

6.1 What sites did WESPINE consider when determining costs associated with relocating the existing gas pipeline?

A decision to relocate the existing gas pipeline cannot be made by WESPINE. Any decision on pipeline relocation could only be made by SECWA.

6.2 In the relocation costing did WESPINE offset costs by considering the existing site, lot 317, being subdivided into a light industrial park?

Yes.

6.3 Have WESPINE considered the benefits and efficiencies of having their operations on the same site, eg.

reduced distance for transfer of mill residues to particle board plant,

allowing the workforce to multi skill and be available for all three locations on the same site,

having one maintenance team to service all three locations from a central workshop at WESFI, and

the three industries would be able to develop better health, safety, training, quality and continuous management practices.

WESPINE is a separate, distinct company to WESFI. It has different share holding and conducts its business with both Bunnings and WESFI on an arm's length basis. All previous WESFI Pine employees have transferred over to WESPINE. There is no "sharing" of employees.

6.4 When considering relocation costs related to the SECWA gas pipeline running through Lot 354, did WESPINE take into account the fact that the northern two thirds of the lot comprises some 150-200 acres of flat useable land which could be used for the sawmill activities?

Yes. The northern two thirds of the land is insufficient in area to accommodate the expanded sawmill.

6.5 When considering relocation costs related to shutdown times, could WESPINE schedule activities in advance to avoid such shutdowns?

No. Such action as described above would be insufficient to overcome the disadvantages associated with relocation.

6.6 Why does the company not investigate the cost of a staged move to Lot 354, installing new machinery and building on the new site while continuing some operations at the old site?

The question of a staged relocation was considered in the report by Wood and Grieve (Section 4.16 of the CER).

6.7 Has the company considered relocating and thus removing the need to obtain a buffer zone?

The Company considered relocation at the request of the Dardanup Shire Council. The CER report contains the findings of the investigation. It found that the cost would vary between \$14.6 million and \$17.4 million. This cost range puts out of the question any possibility of relocation, unless the Government or the Dardanup Shire Council is prepared to pay all costs associated with the move.

6.8 Relocation to Lot 354 would comply with the Preston Park Study.

The Preston Industrial Park Structure Plan as presented is a draft made available for public comment and will be subject to revision after all comments have been received. The draft Plan shows the existing sawmill site as being partly zoned General Industry, and the Company's submission to DPUD suggests that the total site remain zoned as at present - General Industry.

6.9 The cost of purchasing land for an appropriate buffer zone was not addressed during the relocation study.

The cost of purchasing land in the Blue area and the Brown area was not addressed in the CER document.

Clause 18 (3) in the State Agreement provides that the lands the subject of Clauses 18 (2) (a) & (b) may be resumed for the purpose of a buffer. However, the State has indicated that it will not be resuming the land for its own buffer purposes. Therefore any future consideration by the Minister for the creation of a buffer will be dependent on a request by the Company for the establishment of a buffer. If such is the case the Company will pay the cost of resumption. However the Company has no intention at this time to seek resumption for a buffer.

6.10 Did the proponent consider Lot 354 when considering relocation?

The work performed by Engineering Consultants Wood and Grieve and the Accounting firm of KPMG Peat Marwick was a study on the costs of moving the sawmill to Lot 354. Details are available in the CER.

6.11 Has the proponent considered the long term cost benefits of relocation?

The cost estimates of relocating the sawmill to Lot 354 were \$14.6 million and \$17.4 million. These cost levels render totally uneconomic the relocation of the sawmill; longer term benefits will not overcome the high initial cost. It has always been the Proponents view that if the Dardanup Shire Council or the State Government were prepared to pay for the relocation, then the Company would be prepared to move.

6.12 Are full details of the costing prepared by Wood and Grieve available for perusal? If not what allowance was made for Main Roads costs as discussed in Section 4.8 of the Wood & Grieve report?

A token estimate of the costs associated with realigning the Bunbury Ring Road was \$100,000.

6.13 To what extent has the potential savings been off-set against the costs of relocating including (i) the future sale or alternative use of the existing site, and (ii) the savings in road upgrading?

The savings to the Company in relocating are fairly minimal. The principal benefits associated with relocating the sawmill, as suggested by those in favour of the move, is that noise would be easier to control, and that the cost of moving residues to the particle board plant would be reduced. Careful design of new plant, sensible measures in positioning it, and the use of sound absorbing materials on the walls of buildings ensure that the noise regulations will



be met. The only saving in the transport of residues by pipeline would be a minor reduction in the length of pipeline required; the machinery to "drive" the residues from one plant to the other would still be required, and running costs would be virtually the same.

Alternative use of the existing site was factored into the calculations, and the savings in road upgrading, compared to the cost of relocation, are quite minimal.

## 7. Smoke Emissions

### 7.1 Is any treated wood dried in the kilns?

CCA treated timber is not normally dried in the kiln due to the slight structural degradation that occurs at high temperatures. However, a very small quantity of the CCA product range may be kiln dried depending on seasonal and market conditions. The volume of CCA treated timber in this category amounts to less than 0.5% of the total amount of timber dried in the kiln.

### 7.2 Is any treated wood burnt at WESFI's premise?

No.

### 7.3 What does it mean when the proponent states that "the burning of pine will be substantially discontinued" as quoted in the CER?

As a consequence of the expansion of the sawmill the burning of pine waste and offcuts will substantially be discontinued. This will be a consequence of the installation of a chipper within the sawmill, designed to take a variety of off-cuts that, up until this time, have been burnt on site. While the burning of pine waste and offcuts will be drastically reduced, however, it is envisaged that some material with a high degree of foreign matter (such as sand) will need to be burnt on site as it will not be able to be chipped, nor will it be able to be used at the particle board plant.

### 7.4 How can a mill of this size refer to the amount of wood burned as, "only small quantities associated with good housekeeping?"

See 7.3.

### 7.5 Could copper arsenic logs be chipped rather than be burnt?

There are no copper arsenic logs on site. No copper arsenic or CCA treated timber of any kind is burnt on site.

### 7.6 At the sawmill, is CCA treated timber ever burnt on site?

No.

### 7.7 At the sawmill, on 3rd November, were there two piles of CCA treated timber ready to be burnt on site?

No.

### 7.8 Is it possible that when timber is burnt on site does fine ash from the burn settle on the roofs of Copplestone residents?

It is possible that ash from the burning of timber on the sawmill site could settle on the roofs of Copplestone residents. However, the burning of pine waste and offcuts on site has occurred annually in the past, and great care has been taken to ensure that ash from the fire would not cause distress. However, it should be recognised that it is obviously difficult to predict unforeseen wind direction changes.

### 7.9 At the sawmill are all the roads sealed?

All major access roads are sealed. Less frequently used roadways and log yard roadways are not sealed.

### 7.10 At the sawmill, is there a road covered in fine dust which has the potential to generate fine dust?

Log yard roads can sometimes generate dust on windy days.

7.11 At the sawmill, is there a road that is often used by log trucks that could be deemed as dusty, not subject to sprinkler reach?

The section of roadway used for log truck access is not sprinklered.

7.12 At the sawmill, are sprinklers used to keep the dust down?

Sprinklers are used in the log yard to ensure that fugitive dust levels do not create a nuisance.

An additional benefit of sprinklering is that a fungal condition known as Blue Stain, is also prevented.

## 8. Lifestyle Preservation

8.1 Is the company aware of the stress that many residents are now under as a result of their belief that their lifestyle is to be adversely affected?

WESPINE is aware that some residents may be under stress as a result of their belief that their lifestyle is to be adversely affected by the proposed expansion. However, WESPINE considers that this concern is misplaced as potential environmental impacts associated with the expansion are minimal. Residents should feel comfortable with the proposed expansion and the company encourages any concerned residents to read the CER on the proposal.

8.2 There is a concern that residents will experience a significant erosion of their quality of life. This applies to rural type of lifestyle that residents envisaged when moving to the areas of Padbury Fields and Copplestone.

The areas of Padbury Fields and Copplestone are part of an expanding semi-rural residential population. These subdivisions have been adjacent to industry since their inception and they continue to expand with plans to further sub-divide land in the immediate area. As a consequence it is inevitable that the lifestyle of existing residents will change. The proponent considers that the staged upgrade of the sawmill will only be a small contribution to the change that the area will experience over the next ten to fifteen years.

8.3 An increase in noise levels is incompatible with the rural lifestyle of nearby residents.

The proposed upgrade as described in the CER will result in a decrease in operating noise levels emanating from the sawmill.

8.4 There is a need for additional social impact studies into the effects of this expansion on property values and life styles.

The proponent does not share the opinion that additional social impact studies are required on the property values and lifestyles of residents.

8.5 Would WESPINE be prepared to initiate a formal community liaison committee?

The proponent has now committed, with the co-operation of others, to establish a community liaison committee.

## 9. Industrial Fire Risk

9.1 There is a concern with the number of fires occurring on site and the risks associated with them.

The issue of kiln fires is fully discussed in section 3.8 of the CER. The proponent believes that as a result of previous experience and fire controls in place that further fires are most unlikely. It is in the best interests of the proponent that the potential for fires on site is minimised.

9.2 With the increase in sawmill activities and the accompanying increase fuel storage what assurances can the company provide that an increase in fires will not occur?

Refer to the answer to Question 9.1.

## 10. Devaluation of Property

10.1 There is considerable concern that as a result of the expansion there will be a devaluation of properties in the Padbury Field and Copplestone areas.

The proponent understands the concern of residents regarding the devaluation of properties in the Padbury Field and Copplestone areas. However, the proponent does not consider that the expansion of an existing facility within an established industrial area will have a significant impact on property values. A range of issues has the potential to influence property values in the area. Matters such as the increase in availability of home sites in the area due to further subdivision have, in the opinion of the proponent, a greater potential to influence property values. It is the proponent's opinion that an increase in employment prospects will occur as a consequence of the sawmill expansion. This will positively impact on the value of land in Padbury Fields and Copplestone. Already there is a pattern established where workers within the Preston Industrial Park seek to reside in the immediate vicinity. An increase in the number of workers at the Preston Industrial Park will increase the demand for properties in the area, thereby positively impacting on property values.

10.2 Land values are not addressed in Section 3.9.2 of the CER. Is any impact anticipated?

Refer to the answer to Question 10.1.

11. Possible Chemical Spills

11.1 At the sawmill, is there an air dry rack for timber that is dipped in a chemical called "HYLITE 711"?

Yes. HYLITE 711 is a chemical used to control stain and mould on timber. Its active ingredients are zinc naphthenate and carbendazim. It is not considered a hazard if inhaled or swallowed under normal usage conditions.

11.2 At the sawmill, when the racks of timber are taken out and still dripping, does the remainder of the chemical "HYLITE 711" run down the drain? If so, where does the drain go?

When racks of timber are removed from the HYLITE 711 dip tank they are suspended above the tank by forklift until almost drip dry. Any solution that subsequently drips onto the sealed surface is so minute in amount that evaporation of the residual takes place as opposed to run off into the drains.

11.3 At the sawmill is the drain where the chemical "HYLITE 711" flows allowed to enter into the ground water that is used by the people of Padbury Fields and Copplestone?

See 11.2.

11.4 What are the safety requirements of the use of "HYLITE 711"?

Personnel using the chemical are advised to avoid inhalation and skin contact. Normal safety procedures such as gloves and eye protection are recommended. The chemical is considered to be non-hazardous for transport by the Australian Code for the Transport of Dangerous Goods by Road and Rail.

12. Ground water Usage/Contamination

12.1 Is the potential for ground water contamination present due to the spraying of water on logs that have been treated by Koppers CCA plant?

There are no treated logs stored on site. Any timber which has been treated at Koppers is not sprayed and consequently there is minimal potential for groundwater contamination.

12.2 Is the storage area for treated timber surrounded by bunding?

No.

12.3 Is all water run-off from this area analysed?

Monitoring of water in drains leaving the site has been carried out by the Water Authority of Western Australia (WAWA) and the proponent.

12.4 How is the run-off water from the treated timber storage area disposed?

The passage of stormwater from the site is described in Section 2.1.4 of the CER.

12.5 How much of the run-off water from the treated timber storage area enters the ground water?

Run off water from the treated timber storage area is rain water only. As stated in paragraph 4 on Page 8 of the CER; "The timber (treated at Koppers yard) is left standing at this location to ensure that no residual preservatives are transported with the timber back to the sawmill". All run-off from the storage area other than that which evaporates goes into the ground or into drains leaving the site. Drains are monitored by the WAWA.

12.6 How much water is used per annum when spraying the timber logs?

About 260,000 kl per annum.

12.7 There is a concern that the use of 260,000 kl per annum of ground water for dust suppression and log wetting is a waste of valuable natural resource. Why can't a feasible plan be introduced to allow for the recycling of this water?

The increase in capacity of the mill could make the potential for recycling a viable alternative to sinking an additional bore.

12.8 There is a concern that the domestic water supply to surrounding homes will be considerably depleted when WESPINE installs a further bore.

Should an additional bore be sunk, it is probable that it would be sunk into a deeper aquifer that is not utilised by surrounding homes. Before sinking another bore, the proponent would need to liaise with the WAWA.

12.9 Is it possible to see a more thorough assessment by WESPINE of their projected future water requirements with this expansion?

It is considered that previous activities on site provide a solid base for a realistic projected usage of water associated with the expansion. Consequently the proponent sees no need to present additional assessments of water requirements.

12.10 Have any levels of chromium, copper or arsenic been found in the nearby ground water?

Water within drains leaving the site have been monitored on an annual basis by the WAWA. Levels of chromium, copper and arsenic have not been found to be a concern in water leaving the site. This water is considered to be representative of ground water beneath the site since the drains intercept the water table.

12.11 Is the water used to spray the logs to prevent fungus formation allowed to drain into the water table?

Yes.

12.12 Is water that is used to spray chemically treated pine logs allowed to drain into the water table?

There are no treated logs on site and no spraying of CCA treated timber occurs on site.

12.13 Could the water used for spraying treated logs be prevented from entering drains?

There are no treated logs on site and no spraying of CCA treated timber occurs on site.

12.14 Is ground water used by WESPINE saline?

No.

12.15 Can the proponent ensure that there will be no chemical contamination of ground water used in households and by stock nearby?

A review of the Company's operations has shown there to be no processes or chemicals in operations that could result in contamination of the ground water. Consequently the

proponent considers that ground water used by households and stock nearby will not be contaminated by the sawmill operation.

12.16 At the sawmill, are sprinklers used to stop timber drying out? What happens to the run-off water?

Sprinklers are used to minimise fugitive dust emissions and for the wetting of log stocks for the purpose of controlling blue stain (fungal attack). The runoff is via open drains, as detailed in Section 2.1.4 in the CER.

Sprinklers are also used to keep "heart-in" sawn timber in a freshly sawn condition. If the timber is allowed to dry out, it distorts prior to kiln drying and produces an unacceptable level of degrade. The water from this activity ultimately empties into the open drain system.

12.17 At the sawmill, does the run-off from toilets and basins flow into approved septic tanks?

Yes.

12.18 At the sawmill, behind the first aid room does water from the clean up of accidents drain into the storm water drain?

Yes.

12.19 If there was a fire at the sawmill, would the run off water from chemically burning timber in the large air drying yard, run into the storm water drain and into the ground water?

It is much more likely that the water would soak into the ground.

12.20 Would a dam at the sawmill connected to the storm water drain help prevent ground water contamination?

See 12.15

12.21 At the sawmill, do frogs and wild ducks swim in the storm water drain?

Yes.

12.22 At the sawmill, have any employees found dead or dying fauna in the storm water drain?

No.

12.23 At the sawmill, have any employees been injured by chemical contamination?

One employee suffered minor skin irritation approximately 7 years ago when part of his body came into contact with the chemical used in the dip tank at that time. That chemical is no longer used.

### 13. Method of Transport of By-Products

13.1 If WESPINE remains on Lot 317 will they give a firm commitment to acting within a time frame to install a residue waste pipeline.

The CER states that the economics of installing a pipeline indicate that a log input of some 200,000 m<sup>3</sup> per year would be required for the exercise to be viable. The time required to reach 200,000 m<sup>3</sup> per year input is not certain, and the costs associated with the exercise will be dependent on the price of the various items of plant at that time. As the plant would need to be imported, the strength of the Australian dollar will also be of importance. Taking into account all the variables, it is not possible to give a firm date by which the residue pipeline would be installed.

13.2 Is the proposed residue pipeline an integral part of the proposal? If the pipeline cannot be guaranteed, can the traffic and noise studies be re-assessed to show what will be happening in those areas until the pipeline is built?

The proposed residue pipeline is an integral part of the proposal. Consequently the proponent believes that its predictions relating to traffic and noise studies which are dependent on the residue pipeline being installed are reliable. It should be noted that Table 4 of the CER describes the incidence of traffic prior to the residue pipeline being installed. Monitoring has

shown that noise related to traffic will have no significant effect on existing residents. Hence the installation of the residue pipeline will not be required as a noise reduction measure but only to improve the efficiency of transport.

### 13.3 Why aren't the residue trucks covered, during transportation, to prevent spillage?

There are two sources of residue; one is a combination of chips and sawdust. On these loads the sawdust settles beneath the chips and the mass of individual chips is sufficient to keep dust from being blown off the truck at the slow speeds used between the sawmill and the particle board plant.

The other source of residue is planer shavings and these are covered prior to transport.

## 14. Waste Disposal

### 14.1 Why can't residual material be made available to the general public rather than just employees?

The Company is not prepared to allow members of the general public to have unrestricted access to the site. The major concern is the safety of individuals on an industrial site. As a matter of interest, Koppers previously allowed members of the public onto its site, but was forced to withdraw access when it became evident that there was a real possibility of serious injury.

The Company does have disposal sales from time to time, and during these sales offcuts and residual material can be made available to the general public under "controlled conditions".

## 15. Odour Emissions

### 15.1 Would WESPINE conduct an assessment of the pollution of their existing site with regard to the dust and odours emanating from the site? Is WESPINE aware that pine dust is believed to irritate allergies such as hay fever and asthma?

The sawmill operation does not generate sufficient dust or odour to warrant special assessment. The 560 metre distance from the sawmill southern boundary to the northern boundary of the nearest resident limits any impact that dust can have on residents. The proponent is aware that many factors, including wood dust, can irritate allergies such as hay fever and asthma.

## 16. Copper Arsenic Treatment Plant

### 16.1 Why is the issue of a copper arsenic plant discussed in the CER?

The issue of CCA treatment of wood is discussed in the CER since this is a potential activity within the site in the future. This possibility was raised by the proponent at a site meeting in the spirit of being totally frank and open with regard to potential site operations. It is stressed however, that such a plant is not proposed in the immediate future. The establishment of such a plant is an option that the proponent may pursue at a later date. However, such a plant would have to meet the stringent requirements of environmental and health authorities before it could proceed.

### 16.2 Can WESPINE Industries provide details on their intentions with regard a copper arsenic treatment plant at this stage?

The Company has no current intentions of installing a CCA treatment plant. However a watching brief is always kept on the treatment industry, and should an opportunity present itself in the future, the Company would need to acquire EPA clearance before proceeding with such a project.

## 17. Use of Blue Gums

### 17.1 If blue gums were milled would this lead to yet more massive expansion of this sawmill?

The Company has no plans in the foreseeable future to mill blue gums. It is believed that the equipment the Company intends to install would be unsuitable for achieving economic processing of any other than Pinus species.

## 18. Deficiencies Within the CER

18.1 Why is there an absence of important planning information referring to location and zonings for industry, as recommended in the Bunbury Region Plan (1987), in the CER?

The proponent has chosen to discuss only those existing zonings within the sawmill site and the immediate neighbouring land holdings. The recommendations of planning reports are not considered to be relevant to this proposal. It is up to the Minister to decide whether planning recommendations are to be pursued

18.2 There is no reference to the classification of both sawmilling and particle board manufacturing as Class 111 'dusty' industries with recommended buffer zones of 1000m (ref DT Rigden, 1977). There is no reference to the fact that the existing sawmill is located in a zone from which 'dusty' industry should be excluded, according to the Bunbury Regional Plan (1987).

The sawmill was established some ten years prior to the publication of the Bunbury Regional Plan and with the approval of the Dardanup Shire Council and the State Government. The operators of the sawmill are aware of potential dust problems and go to great lengths to ensure this potential inconvenience is minimised.

18.3 There is only scant reference to the Preston Industrial Park Structure Plan Study.

The Preston Park Industrial Structure Plan study was issued in draft form concurrently with, but unrelated to, the release of the CER on the proposal. The proponent had little time to consider the document. However meetings were held with the authors of the report to consider whether the proposed upgrade was consistent with the Plan's recommendations. It was the conclusion of the proponent that the upgrade of the sawmill was not in conflict with the substantive findings of the report, provided appropriate noise mitigation measures were employed. Having made this comment however, the proponent is in disagreement with the study's recommendation that the sawmill should be relocated, and has made a submission to that effect.

18.4 There is no comprehensive meteorological data for the Bunbury area. Wind data used for modelling exercises is restricted to 9 days.

A comprehensive set of meteorological data is not a requirement for the Herring Storer noise study. The major concern is the propagation of noise in all directions under unfavourable (including worst case) wind conditions. This is described in the CER and subsequent modelling.

18.5 There is inadequate reference to the Department of Planning and Urban Development's Industry and Transport Strategy (1991).

DPUD's Industry and Transport Strategy for the Bunbury-Wellington area (1992) considers in a broad context some of the issues addressed in the CER. However, there is insufficient detail, specifically regarding Moore Road and the industries located upon it, to warrant specific reference.

18.6 There is no reference to Nett Regional Economic and Social Benefit assessment procedures as advocated for industrial development proposals in the South-West Strategy (1991).

The proponent recognises the assessment procedures as recommended in the South-West Strategy (1991) published by the South-West Development Authority. The Authority recommends that a proposal "be assessed on the grounds of its Nett Regional Economic and Social Benefit" by way of a study on the basis of employment, social and infrastructure criteria. This is to be in addition to environmental assessment. Consequently, the proponent considers that such procedures are not a requirement of the Environmental Approval process.

18.7 Where will the 5,500,000 and up to 6,000,000m<sup>3</sup> of sawlog quality timber over 20 years come from? Will the commitment by the State with regard to this resource put pressure on the State to provide this resource with the possibility of unacceptable environmental impacts?

The issue of log supply is addressed on page 15 of the CER. A diagram showing the distribution of pine plantations throughout the south-west from which logs will be drawn is shown in Figure 15. The harvesting of this resource is the responsibility of the State and is a process which does not involve the proponent. Consequently the proponent cannot answer the question regarding the unacceptability of environmental impact associated with the harvesting of this resource.

18.8 The company appears to have very limited water quality data and is therefore not in a position to predict the impacts to the surface drainage and shallow ground water aquifers as they have done in the CER.

In the event that recycling of water is not a viable economic alternative, it is important to note that the ground water that could be used in the expanded plant will come from a deep aquifer that is not utilised by surrounding ground water users. Consequently there would be little or no impact expected as a result of the increase in ground water usage. As discussed previously the proponent would need to satisfy WAWA that there are no adverse impacts associated with an additional bore prior to any such bore being licensed for use. With regard to surface drainage and shallow ground aquifer quality, WAWA has been monitoring the situation for a considerable period of time and no water pollution has been identified. The company, as part of a broad programme of monitoring, has since analysed the water leaving the site in surface drainage and can confirm the findings of WAWA.

18.9 There doesn't appear to be a monitoring programme in place which would allow the company to say that their process is innocuous as claimed in the CER.

The proponent does not believe that a monitoring programme is required, given the operations that occur on site. These operations involve only the milling, drying and machining of timber.

18.10 Ground water impacts for the expansion were not covered at all in the CER.

Ground water impacts are discussed on page 31 of the CER.

18.11 What is the annual average production operations of:

- a) the particle board plant?
- b) the sawmill?

The annual production of the particle board plant is proprietary information and is not available. The log input to the sawmill is currently 70,000 m<sup>3</sup> per year, and it is planned that this will increase to in excess of 400,000 m<sup>3</sup> over a period of approximately 10 years.

18.12 An existing dwelling located on Lot 342 within 300m of the sawmill was not considered in the CER and was omitted from Figure 9.

It is recognised that an existing dwelling located on lot 342 is within 300 metres of the sawmill. Reference to this dwelling is made on page 11 of the CER. Figure 9 shows the small holding subdivisions adjacent to the sawmill only and as the dwelling within Lot 342 is not part of these subdivisions it is not shown in the figure.

18.13 Is the company satisfied that the consultative phase of this project was adequate? What sampling method was used during the survey to obtain the sample of 50 residents?

The company conducted a consultative phase involving a visit to nearby residents. The objective of this programme was to identify issues of concern. This was not a formal process and consequently required no specific sampling method. However, those closest to the mill were visited and those who were home at the time of the survey were asked their views. It is recognised that some residents were absent despite repeated attempts to obtain their views on the expansion of the sawmill.

18.14 Why has the company not provided the detailed description of the existing residential communities adjacent to the site as required in the guidelines?

The proponent is of the opinion that the detail given in the CER on the existing residential communities adjacent to the sawmill site is adequate. It is also of the opinion that



this detail is sufficient to assess the potential environmental impacts posed by the development on these residents. The concerns of residents were established during a consultation programme and these concerns have been addressed in the CER.

18.15 What advice did the proponent receive at the beginning of the CER process from the Social Impact Unit regarding consultation with the local communities? Was this advice acted on?

The Social Impact Unit recommended that the proponent conduct a programme to determine the issues that would be of concern to the residents adjacent to the proposed sawmill. The proponent chose to determine residents' concerns by conducting a survey using local people who are responsible for operations in the area. The proponent is confident that this survey achieved its objective since the issues raised were the same as issues raised in a survey conducted by the residents' action group for the area.

## 19. Additional Commitments

In response to the issues raised in the public responses on the CER the proponent is prepared to make the following commitments in addition to those in the CER. These are as follows:

The proponent will prepare and implement a water monitoring programme to meet the requirements of WAWA.

The proponent will, with the co-operation of others, establish a community liaison committee. This committee shall be established prior to the commencement of Stage 1 and be to the satisfaction of the EPA.

## **Appendix 3**

**Letter from Department of Conservation and Land Management —  
Commitments to be included in the Consultative  
Environmental Review (CER)**

DEPARTMENT OF CONSERVATION AND LAND MANAGEMENT

HEAD OFFICE  
HACKETT DRIVE CRAWLEY  
WESTERN AUSTRALIA  
Perth (09) 386 8811  
Telex AA 94888  
Facsimile (09) 386 1378

STATE OPERATIONS HEADQUARTERS  
50 HAYMAN ROAD COMO  
WESTERN AUSTRALIA  
Perth (09) 367 0333  
Telex AA 94616  
Facsimile (09) 367 0466

Please address all correspondence to Executive Director, P.O. Box 104, COMO W.A. 6152

Your Ref:  
Our Ref: 032338F1404  
Enquiries: Mr Keene  
Phone: 386 8811

The Manager  
Wespine Industries Pty Ltd  
1 Somersby Road  
WELSHPOOL WA 6106

Dear Sir

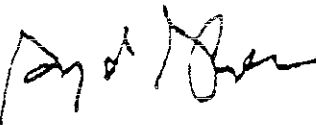
**EXPANSION OF DARDANUP SAWMILL CER**

This is to authorise you to include in the Consultative Environmental Review (CER) for the proposed Major Stage Expansion of the Wespine Industries Pine Sawmill at Dardanup the following commitments on behalf of the Department of Conservation and Land Management (CALM).

1. CALM will ensure that all of its operations relating to the supply of pine logs to the Dardanup sawmill are in accordance with the provisions of the Conservation and Land Management Act 1984 and Regulations thereto, and with all relevant approved and then current Forest Management Plans.
2. CALM will ensure that road haulage contractors it employs to transport pine logs to the Dardanup sawmill receive specific direction regarding the routes to be used between each plantation controlled by CALM and the sawmill. CALM will also ensure that its contractors comply with any conditions imposed by the Main Roads Department or a Local Authority issued in accordance with the relative statutory responsibility regarding the use of any route.

I am agreeable for you to include a copy of this letter in the CER to confirm my authorisation for you to make the above commitments on behalf of CALM.

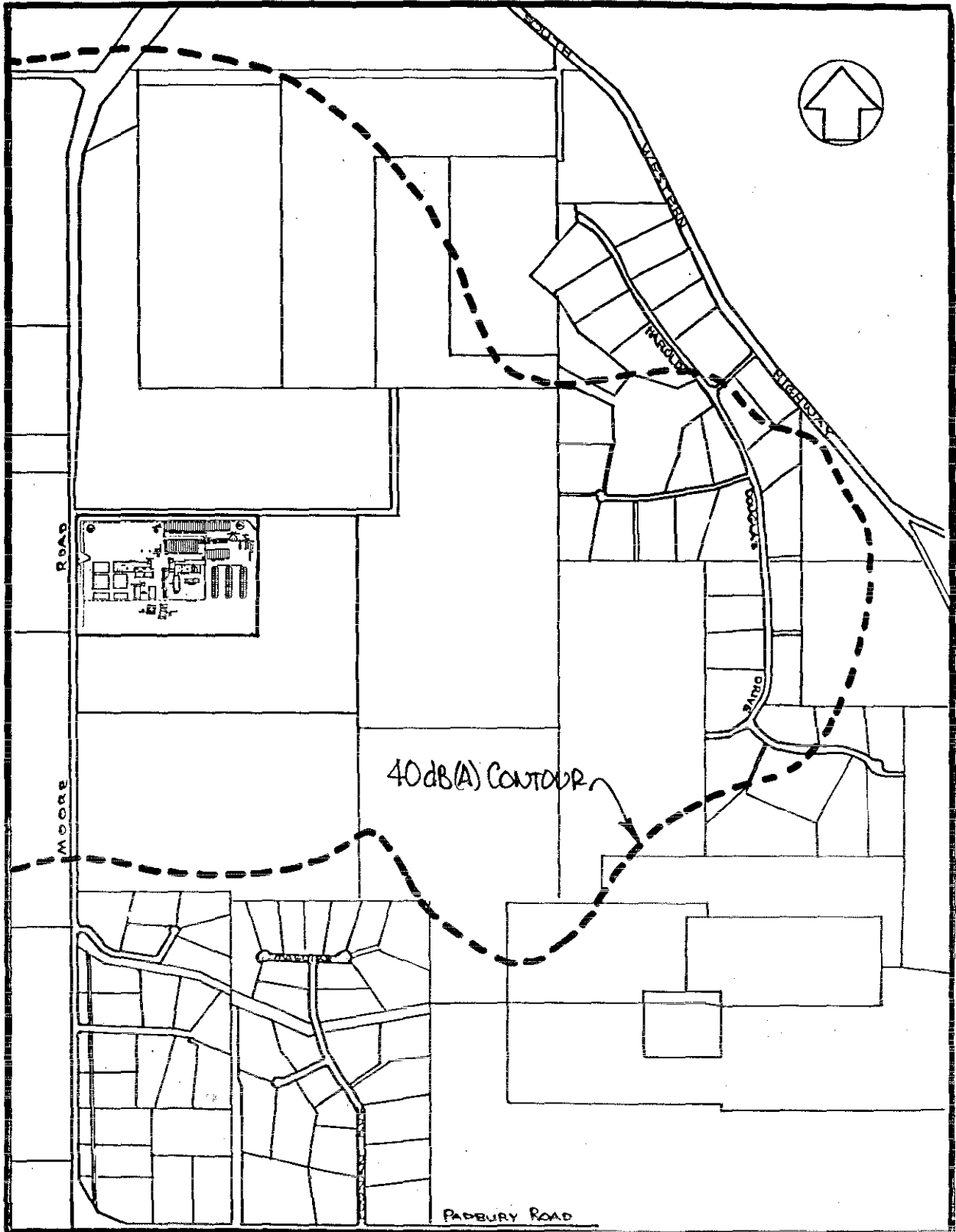
Yours faithfully

  
Syd Shea  
EXECUTIVE DIRECTOR

10 September 1992

## **Appendix 4**

**Additional information supplied by proponent —  
Noise contours for surrounding areas**



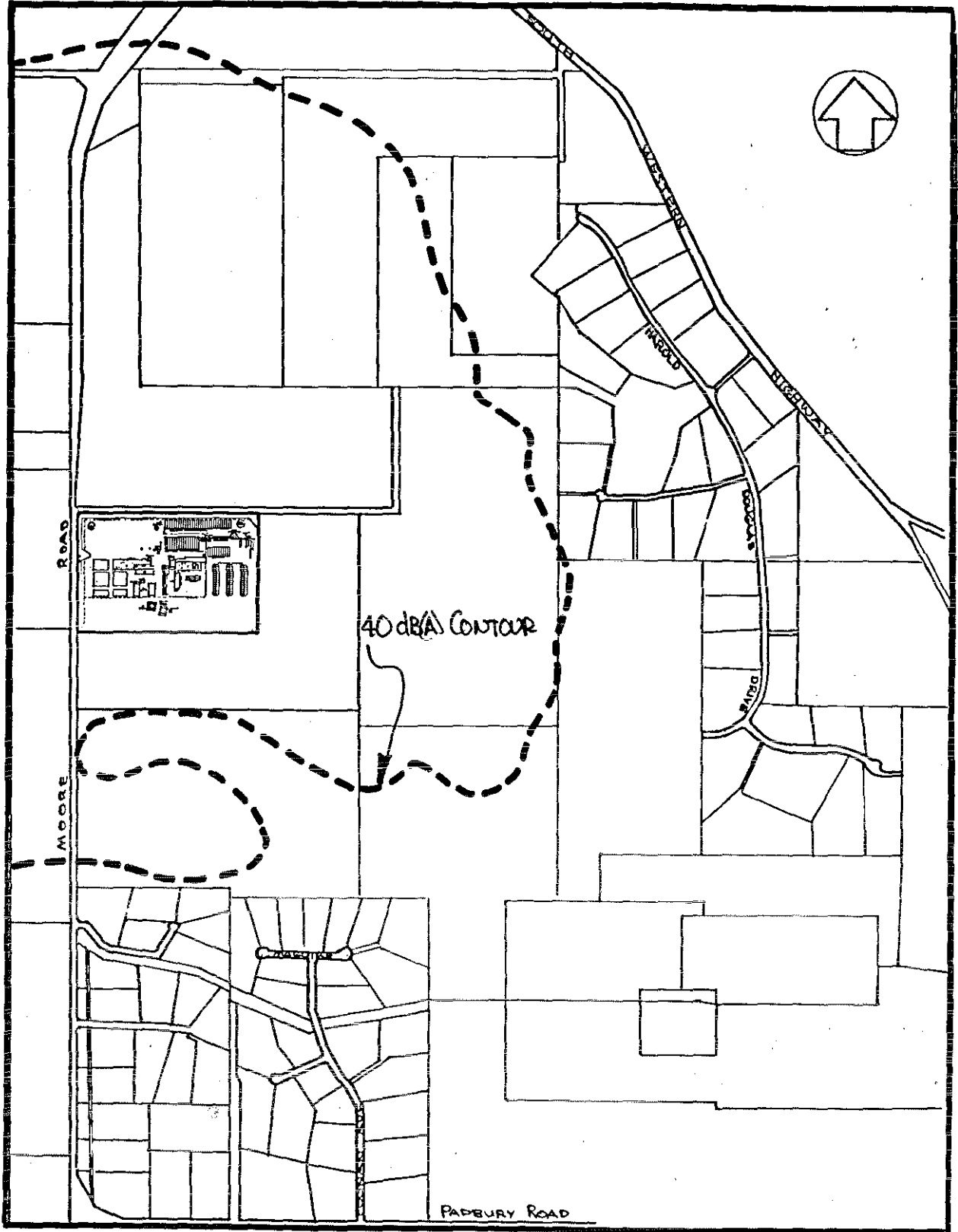
*No additional noise control*

NOISE LEVEL CONTOURS SHOWN  
ARE IN dB(A) AND ARE EQUIVALENT  
TO L10 PERCENTILE LEVELS

EXPANDED PLANT  
COMPOSITE MAXIMUM DOWN WIND PROPAGATION  
IN ALL DIRECTIONS

DATE: NOV. 1992	SCALE: N. T. S.	BY: L. STORER	DRG. NO. 92056/05
WESPINE INDUSTRIES PTY LTD DARDANUP EXPANSIONS NOISE LEVEL PREDICTIONS		HERRING STORER ACOUSTICS Suite 34 11 Preston Street Cowa, Western Australia, 6152 Telephone: 0953676200 Facsimile: 0954742579	





*With additional noise control*

NOISE LEVEL CONTOURS SHOWN  
ARE IN dBA AND ARE EQUIVALENT  
TO L10 PERCENTILE LEVELS

**EXPANDED PLANT**  
**COMPOSITE MAXIMUM DOWN WIND PROPAGATION**  
**IN ALL DIRECTIONS**

DATE: NOV. 1992	SCALE: N. T. S.	BY: L. STORER	DRG. NO. 92056/06
<b>WESPINE INDUSTRIES PTY LTD</b> <b>DARDANUP EXPANSIONS</b> <b>NOISE LEVEL PREDICTIONS</b>			<b>HERRING STORER ACOUSTICS</b> Suite 24 11 Preston Street Conq Western Australia, 6152 Telephone: 0936676200 Facsimile: 0934742379

