

Document 05

Decommissioning and Rehabilitation Plan
Site of Triabunna Mill
Triabunna Investments PTY LTD
January 2014



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Appendix C:	Triabunna Investments Limited – Triabunna Chipmill Environmental Protection Notice No. 8631/2
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Appendix H:	Gunns Limited - Triabunna Mill Asbestos Identification Confirmation and accompanying site map. Drawn from the Gunns Limited Asbestos Register, part of the Gunns Limited SHE Register
Appendix I:	EPA Tasmania, November 2012; Information Bulletin No. 105 (Environmental Management and Pollution Control (Waste Management) Regulations 2010) Classification and Management of Contaminated Soil for Disposal

1. INTRODUCTION

This Decommissioning and Rehabilitation Plan relates to Triabunna Investments Pty Ltd.'s property at 555 Freestone Point Road, Triabunna. This is a 42 ha property located on Freestone Point at the mouth of the Triabunna Harbour. The site is a former woodchip mill held in care and maintenance since its purchase by Triabunna Investments Pty Ltd in 2011.

The site is currently zoned Industrial/Commercial. The land immediately around the facility is zoned rural.

A Site Map of the property can be found in Appendix A and A1.

A time-series of aerial photographs, covering pre-woodchip mill construction (1966), immediately following construction of the woodchip mill (1972), the site as an operating woodchip mill (1991) and the site under Triabunna Investments PTY Ltd ownership (2011) are attached as Appendix B.

The site is operated under *EPA Tasmania Environmental Protection Notice (EPN) No 8631/2ⁱ* attached to the permit (No 3389), issued in October 2011. This is appended at Appendix C.

This document provides a Decommissioning and Rehabilitation Plan for the Triabunna Investments Pty Ltd Triabunna site as required by EPA Tasmania. It lists the proposed actions to be taken to initiate rehabilitation of the property to a level suitable for Commercial/Industrial use, as currently zoned. It is expected that decommissioning and rehabilitation will be completed by June 2014.

For the purpose of this plan it is assumed that the land will remain zoned Commercial/Industrial and the landowner will remain Triabunna Investments Pty Ltd.

The decommissioning and rehabilitation operations will be conducted in accordance with the conditions of the EPN No 8631/2, and associated guidelinesⁱⁱ which can be found at Appendix D.

2. SITE HISTORY

The site is located at Freestone Point at the mouth of the Triabunna Harbour and consists of 42 Ha with extensive water frontage to the south and west with an elevated aspect. Freestone Point is a small headland adjacent to Spring Bay and is approximately 5 kilometres from the Triabunna Township. It is a well-known landmark industrial site in Tasmania, operating as a woodchip mill from 1971 to 2011.

Adjacent to the site is an area occupied by an industrial fish processing facilities which have water, solid waste and atmospheric emissions.

Prior to 1970, the site was farmed for sheep and cattle. Tasmanian Pulp and Forests Holdings (TPFH) purchased the property in 1970 from Ian Weeding.

TPFH constructed a woodchip mill which started operating in 1971. It was then acquired by North Forest Products. As of December 1995, the Mill operated under EPN permit 3389.

Gunns Limited purchased the site in 2001 and continued to operate the site as a working woodchip mill, under EPN No 663/1. The site became part of Gunns Limited integrated forestry operations in Tasmania.

Early practices included pumping salt water from coastal environment to blast the bark of the logs to ready them for chipping. The wash water was discharged back to sea after treatment in a three pond system. The process of bark blasting and wash water discharge to the sea was halted in 1981. A wetland system for wastewater and leachate treatment using freshwater was commenced at this time. In 1992 the mill ceased burning all wood waste on adjoining land.

Gunns Limited implemented a number of environmental policies and procedures during the operation of the site. These included environmental performance reporting, periodic audit, emergency response and community complaints management, and reportedly managed the site according to the requirements of relevant National and Tasmanian Policies and Standards. Open-air incineration of wood wastes was phased out in 2003. The earthen bulk lube bund was updated in April 2003 to a concrete bund with a capacity to contain 6000 litres.

A 2009 Public Environmental Report of the Triabunna Woodchip Mill conducted for Gunns Limited by DNW Certification Pty Ltdⁱⁱⁱ, showed that the Company was operating within the production and environmental limits attached to its permits (Appendix E). Figure 5 included in this document outlines the site layout at this time. Gunns Limited was operating a 24-hour, seven-day week woodchip processing facility, producing hardwood woodchips for export to the Asian market. The site included the wood chipping mill, administration building, and workshops for machinery maintenance, log and chip storage facilities, waste bark dump, settling ponds and a wharf for woodchip vessels. Major equipment included a weighbridge, chipping line, ship loader and wastewater system. The Report provides specific details of the support infrastructure and operations for each of the buildings and equipment^{iv}.

An average of 800,000 tonnes of woodchips/annum were produced over the operational life of the Mill. According to the EPN Notice (No 7942/1^v) issued on 24 June 2010, the regulatory limits were specified as:

- Must not exceed 1,600,000 tonnes / year of woodchips produced, and
- Must not exceed 5,000 litres / calendar month of fresh mains water used.

The historic photograph sequence (found in Appendix B) illustrate the changes to the site between the periods from 1966 to 14th March 2011. The 1972 aerial photograph shows the woodchip mill in operation, and indicates significant changes in vegetation coverage as well as major new infrastructure and log yards. The 1991 and 2011 photographs illustrate that the major infrastructure has changed little since 1991. Since the mill was closed by Gunns Limited in 2011 no additional infrastructure or vegetation changes have occurred onsite. The photographic sequence indicates that the site has changed little since the original construction of the Mill, and show no obvious signs of contamination problems or major issues requiring specific action over and above that identified below.

The exception to this is the main holding dam has been relocated, at different times, this will need to be a focus of the Decontamination Plan.

Triabunna Investments Pty Ltd did not continue the lease of adjacent property owned by Ian Weeding which had been used by Gunns Limited as a debarking area and overflow wood yard. Ian Weeding's property has since been rehabilitated by Gunns Limited to Ian Weeding's satisfaction. This area is not subject to this Decommissioning and Rehabilitation Plan. The site has been closely monitored by the Tasmanian Environmental Protection Authority for most of its operational life. The site is at the low end of contamination risk. The site is extensively bunded with an elaborate system of water channels into a purpose built dam which continues to be routinely monitored for contamination by regular water sampling. There are no known major points of contamination within the property.

In May, 2011 Gunns ceased woodchip operations and placed the mill in care and maintenance mode pending sale. The property was purchased by Triabunna Investments Pty. Ltd. in August that year. Care and maintenance has continued since then. A new EPN (No 8631/2) was issued in October 2011 to vary the permit conditions for the site (Appendix C).

An independent review of the environmental risks associated with the Triabunna Woodchip Mill was conducted by Sustainable Environmental Assessment and Management (SEAM) for Triabunna Investments Pty Ltd in August 2011, to check for any obvious site contamination issues (Appendix F). This found no substantive contamination issues¹.

SEAM's conclusions were confirmed in subsequent discussions with EPA Tasmania² and an on-site inspection by EPA Tasmania officers³ on 30 October 2012, conducted in response to a complaint received on 29 October 2012. The inspectors undertook a general site inspection in addition to responding to the specific complaint and found no contamination or odour resulting from practices or incidents on the Triabunna Chipmill site (Appendix G).

That site inspection did advise that a pipeline from a drainage channel and culvert designed to collect stormwater from the log yard area was discharging into settling ponds on the adjacent property rather than to the irrigation storage dam or directly to the 'chain of lagoons' wetland system, as required by the EPN No 8631/2. This was required because Triabunna Investments Pty Ltd had ceased leasing adjacent land and therefore was required to redirect water back to its own property. Their recommended changes were immediately implemented and then inspected by EPA officers and judged compliant with the EPN requirements.

There have been no other issues requiring remedial action in the time since Triabunna Investments Pty Ltd purchased the site in 2011.

3. SITE FUTURE

Triabunna Investments Pty Ltd will decommission the site to the degree necessary to satisfy EPA that all contamination from the former L2 activity is being remediated and all equipment

¹ The review did identify a small number of potential environmental risk issues which have been incorporated into the Action Plan below.

² Communications conducted between Mr Alec Marr, General Manager of TI and XXXXX, EPA Tasmania

³ Investigation was carried on 30th October 2012 by Mr Anthony Cook, Environmental Officer, and Senior Environmental Officer Mr Gary Brown, both of EPA Tasmania.

without a future beneficial use at the site is being decommissioned and removed. Much will be retained for interim use, including the buildings and most equipment. Any future change of use will be managed via appropriate regulator.

There is no intention to demolish any buildings containing asbestos, as identified in Appendix H.

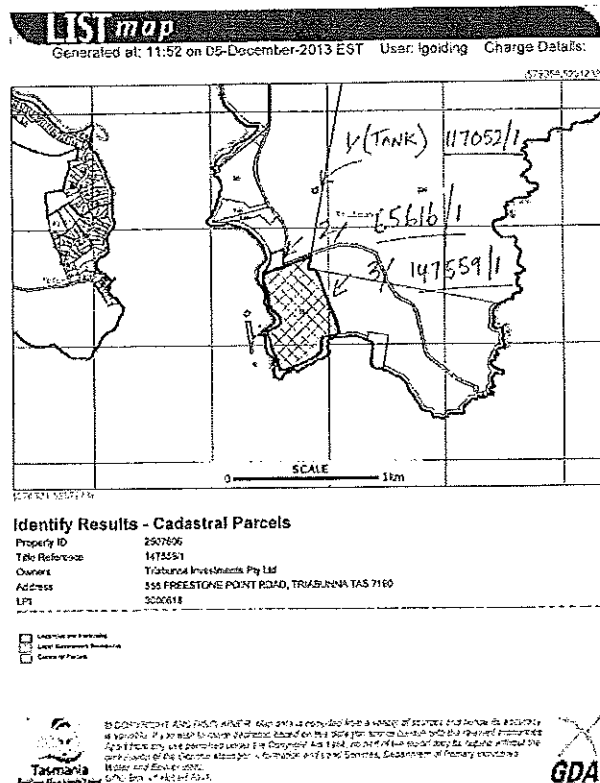
4. LAND TENURE

Triabunna Investments Pty Ltd is the registered proprietor of the property at 555 Freestone Point Road, Triabunna, Tasmania. The property is comprised of three separate Certificates of Title. They are:

1. Certificate of Title Volume 147559 Folio 1 (the largest title and includes the Mill);
2. Certificate of Title Volume 65616 Folio 1 (a smaller parcel of land adjacent to the Mill site); and
3. Certificate of Title Volume 11705 Folio 1 (the smallest title and is a tank site)

These are identified in the following ListMap print report⁴⁴.

⁴⁴ Generated from <http://www.thelist.tas.gov.au/listmpa/listmapgetpdfprintpage?minz=574320.79051745> on 6/12/2013



<http://www.thelist.tas.gov.au/listmap/listmapgetpdf/printpage?minx=574320.79051747...> 6/12/2013

5. OBJECTIVES OF DECOMMISSIONING AND REHABILITATION

The general objective of the decommissioning and rehabilitation is to rehabilitate the property to Commercial-Industrial zoning use, while undertaking all necessary decommissioning and rehabilitation actions safely and without environmental or public harm, and in line with EPA Tasmania decommissioning and rehabilitation plan guidelines (Appendix D).

Specific advice provided by the Guidelines include:

- To reduce environmental risk and the potential to cause environmental harm from decommissioning and post decommissioning phases, including clean-up and rehabilitation;
- To ensure environmental risk and the potential for environmental harm is minimised once the site has been rehabilitated to an appropriate land use in accordance with the appropriate standards for that land use;
- To provide effective environmental management of any remaining production and decommissioning phases;

- To provide an agreed process for the planning and validation of any clean-up and rehabilitation actions; and
- To provide an agreed system of environmental monitoring and reporting of environmental conditions on the site during and after the decommissioning and rehabilitation of the site.

6. BASELINE ENVIRONMENTAL DATA

Triabunna Investments Pty Ltd understands that a number of background studies and regular environmental audits were commissioned during the use of the site as an operating mill.

A 2009 Public Environmental Report of the Triabunna Woodchip Mill conducted for Gunns Limited by DNW Certification Pty Ltd^{vi}, in fulfilment of environmental conditions attached to its EPN (No 663/1) and of the Environmental Management and Pollution Control Regulations 2007, and reviewed site environmental performance for the three year period July 2006 to June 2009 (Appendix E). This document provides a report on progress made to achieve previously set objectives and targets documented in their earlier environmental performance review, and compliance with required regulations.

This report has been included because it demonstrates that Gunns Limited was meeting its EPN obligations in a modern context between the years 2006 and 2009. It also identifies the methodology and degree of regulation at this time.

The Report indicates that Gunns Limited implemented a number of environmental policies and procedures during the operation of the site. These included environmental performance reporting, periodic audit, emergency response and community complaints management, and compliance with all relevant requirements of National and Tasmania Policies and Standards for the decommissioning and rehabilitation of the site.

Gunns Limited also reported that it managed the site according to the requirements of relevant National and Tasmanian Policies and Standards, including:

- Workplace Health & Safety Amendment Act 2002;
- Workplace Health & Safety Regulations 1998;
- Environmental Management & Pollution Control (Air Quality) Regulations 2006;
- Relevant parts of the Environmental Management and Pollution Control Act 1994(EMPCA);
- Environment Division - Solid and Hazardous Waste Policy;
- Environment Division - various information bulletins on the classification and management of contaminated soil for disposal;
- National environment protection measures (NEPMs) 1999 Guidelines on Protection of Health and the Environment during the Assessment of Soil Contamination, Guidelines on the Investigation Levels of Soil and Groundwater, Assessment of Contamination under the National Environment Protection Council Act 1999; and
- Australian and New Zealand Environment Conservation Council (ANZECC) guidelines and procedures for various areas of environmental protection and management (these refer to surface, ground and marine waters, soil contamination and air pollution).

The Report contains a description of Gunns Limited's Environmental Management System (EMS) implemented to provide "the systematic basis which facilitates our continued compliance to applicable legal requirements set by regulators as well as policy commitments set by the company^{vii}." It also provides a summary of the contents of external audits conducted by DNV during 2006-2009^{viii} which states that the general site conditions at Triabunna were excellent. Action to remedy a number of issues relating to bunding, drainage and signage identified during the audits are reported.

This report provides baseline data relating to wind direction, water catchment, air emissions, water emissions, land and soil contamination, general and controlled waste, water usage, biodiversity and noise^x. At this time there was no significant air emission issues reported, no known land or soil contamination of the site, no on site refuse burial, no known adverse impacts on fauna or flora in the external environs to the site, and no complaints registered regarding noise. No significant changes to any areas covered by EPN 663/1 were reported for this reporting period, and there were no external complaints received during this period.

The report includes a summary of environmental monitoring conducted in accordance with the conditions of the EPN 663/1, Attachment 3, together with other monitoring and reporting conducted on the mill site^x, including sewage discharge, wetland pond testing, solid waste, lubricating oils, energy usage, and fresh water, and noise and irrigation water volumes. This indicates no breaches of permit conditions and no noticeable adverse trends during the reporting period.

The overall compliance statement for EPN No 663/1^{xi} indicates compliance with all required elements, including production quantities, waste water, atmospheric emissions, noise, solid wastes, hazardous materials, aesthetics wetlands, and review of their EMP, and no environmentally significant changes were anticipated for the next reporting period.

Triabunna Investments Pty Ltd is not aware of any major contamination incidents on the site or any incidents which required EPA Tasmania intervention⁵.

The Gunns Limited - Triabunna Mill Asbestos Identification Confirmation and accompanying site map can be found at Appendix H. This is drawn from the Gunns Limited Asbestos Register as part of their *Safety, Health and Environment Register*, and was originally compiled by Environmental & Technical Services Pty Ltd in December 1998.

As noted above, a limited independent review of the environmental risks associated with the Triabunna Woodchip Mill conducted by Sustainable Environmental Assessment and Management (SEAM) in August 2011, found no major points of contamination within the property. (Appendix F). It is noted that this was a brief analysis undertaken to ensure that there were no sites of obvious contamination and was not designed as a definite analysis. Discussions with EPA Tasmania and an on-site inspection conducted by EPA officers in 2012 confirmed this assessment.

Triabunna Investments Pty Ltd acknowledges that there may be localised contamination in specific areas, such as around the site of the Diesel Fuel Storage Tanker, and the SEAM review

⁵ Pers Comm with EPA Tasmania, former CEO of Gunns Limited and former Site Managers.

made some recommendations relating to possible low level environmental impact issues. These potential localised contamination sites have been prioritised for sampling as outlined in the Plan below.

7. LEGAL & OTHER OBLIGATIONS

7.1. Key Statutes and Regulations

Triabunna Investments Pty Ltd has met obligations under its EPN No 8631/2. The DRP will also form part of the legal obligations.

Triabunna Investments Pty Ltd will refer to all relevant requirements of National and Tasmanian Policies and Standards when determining appropriate standards for environmental protection and remediation as part of the decommissioning and rehabilitation of the mill site. These include:

- *(Tas) Workplace Health & Safety Act 1995 and Amendment Act 2002;*
- *(Tas) Workplace Health & Safety Regulations 1998;*
- *(Tas) Environmental Management & Pollution Control Act 1994;*
- *(Tas) Environmental Management & Pollution Control (Air Quality) Regulations 2006;*
- *(Tas) Environmental Management & Pollution Control (Waste Management) Regulations 2010;*
- *(Tas) Environmental Management & Pollution Control (Miscellaneous Noise) Regulations 2004;*
- *(Tas) Agricultural & Veterinary Chemicals (Control of Use) Act 1995;*
- *(Tas) Agricultural & Veterinary Chemicals (Control of Use) Order 1996;*
- *(Tas) Agricultural & Veterinary Chemicals (Control of Use) Order 2001;;*
- *(Tas) Boundary Fences Act 1908;*
- *(Tas) Building Act 2000;*
- *(Tas) Building Regulations 2004;*
- *(Tas) Dangerous Goods Act 1998;*
- *(Tas) Dangerous Goods (General) Regulations 1998;*
- *(Tas) Dangerous Substances (Safe Handling) Act 2005;*
- *(Tas) Dangerous Substances (Safe Handling) Regulations 2009;*
- *(Tas) Fire Services Act 1979;*
- *(Tas) Land Use Planning & Approvals Act 1994;*
- *(Tas) Rivers and Water Supply Commission Act 1999;*
- *(Tas) Pollution by Waters of Oil and Noxious Substances Act 1987;*
- *(Tas) State Policy for Water Quality Management Act 1999;*
- *(Tas) State Policies and Project Act 1993;*
- *(Tas) Weed Management Act 1999;*
- *(Tas) EPA Tasmania - Information Bulletins on the classification and management of contaminated soil for disposal;*
- *(Aus) Environment Protection & Biodiversity Conservation Act 2007;*
- *(Aus) Environment Protection & Biodiversity Conservation Regulations 2000;*
- *(Aus) National Environmental Protection Measures (NEPMS)*
- *(Aus) 1999 Guidelines on Protection of Health and the Environment during the Assessment of Soil Contamination, Guidelines on the Investigation Levels of Soil and*

Groundwater, Assessment of Contamination under the National Environment Protection Council Act 1999; and

- Australian and New Zealand Environment Conservation Council (ANZECC) guidelines and procedures for various areas of environmental protection and management (these refer to surface, ground and marine waters, soil contamination and air pollution).

7.2. Regulatory Instruments

The Triabunna site currently operates in accordance with an EPN No 8631/2, issued in accordance with the Environmental Management and Pollution Control Act 1994.

The EPN Permit requires the Decommissioning and Rehabilitation Plan to address:

- Any approvals from other authorities, such as building permits to be issued by the Spring Bay Council with respect to decommissioning and rehabilitation works;
- Relevant Workplace Standards permits or requirements for removal of asbestos, decommissioning of boilers etc.;
- Application of environmental standards for acceptance criteria for soil contamination removal and clean-up;
- Acceptance criteria for remediation of surface and ground water contaminants;
- Occupational Health and Safety and Public Health requirements;
- Land Use Planning requirements for current zoning and any relevant planning permit requirements; and
- Stakeholder consultation process with company representatives, relevant federal, state and local government agencies and community groups.

7.3. Environmental Standards

Site Contamination Assessment and Remediation Plans

A suitably qualified site decontamination and remediation consultancy will be contracted to design and oversee a Site Contamination Assessment Plan (that will form part of the overall Decommissioning and Rehabilitation Plan (DRAP) and inform the consequent Remediation Plan). This work will include identifying sites for soil and / or water sampling and the methodology for that soil and water sampling, oversight of the execution of the sampling and any required remediation action. The site decontamination plan will be submitted to EPA Tasmania for approval prior to implementation.

Standards

Soil contamination, surface and groundwater contamination will be defined by measurement against the standards required by the Environment Protection Authority, OH&S Policies, Public Health Policies and Land Use and Planning Policies. Decontamination of any soil or waters will be undertaken to meet the standards required for EPA Tasmania to certify that the site has been decontaminated to the satisfaction of the Government of Tasmania and that no liability rests with Triabunna Investments Pty Ltd in the future.

Specifically soil contamination standards are guided by EPA Tasmania Information Bulletin No. 105 (Environmental Management and Pollution Control (Waste Management) Regulations 2010) Classification and Management of Contaminated Soil for Disposal November 2012, attached as Appendix I.

The procedures for contaminated water assessment are set by National Environmental Protection Council for (Assessment of Site Contamination) Measure 1999. The current EPN requirements will be maintained during the decommissioning and remediation process.

8. DECOMMISSIONING / DECONTAMINATION COSTS

A detailed costing will be drawn up by the Decommissioning and Rehabilitation Manager once the plan has been approved. A working budget of \$300,000 has been allocated to the Decommissioning work and an additional \$300,000 has been allocated to the Decontamination and Rehabilitation work.

9. DECOMMISSIONING AND REHABILITATION ACTION PLAN (DRAP)

9.1. Overview

It is planned that majority of buildings and infrastructure will remain in place. The intention is to render the existing infrastructure safe to required occupational health and safety levels and ensure the site is environmentally benign, with minimal changes to the actual infrastructure.

The primary actions identified are:

- Removal of Ship Loader
- Redistribution of wood chip piles
- Rehabilitation of main holding dam and wetlands
- Removal of high voltage switch yard
- Clearance and remediation of the storage yard
- Remediation as required on the main log yard
- Removal of main diesel tank and bowser and any required remediation of the site
- Removal of water reclaim tanks
- Removal of the water reclamation system
- Removal of all woodchip conveyor systems (apart from the one leading from the Screen house)

9.2. Human Resources

The operating Triabunna Woodchip Mill was closed in May 2011 and all staff made redundant by Gunns Limited prior to the sale to Triabunna Investments Pty Ltd. Triabunna Investments Pty Ltd contracted six of these staff on a fixed 6 month period to continue care and maintenance mode.

Triabunna Investments Pty Ltd currently retains a permanent caretaker⁶ located on site 24 hours a day, seven days per week. (The site is currently secured by an eight foot high barbed-wire fence around the perimeter and security gates.) The caretaker role will continue throughout the decommissioning and rehabilitation process. The caretaker has been notified of the decommissioning plans and the estimated timeline for completion of decommissioning and rehabilitation. It is expected that the caretaker will be retained until completion of the

⁶ Mr Mark Davis, 0448 747 520

DRP. There are no redundancy or other payments due as part of the caretaker's termination agreement.

9.3. Decommissioning and Rehabilitation Team

Implementation of the overarching Decommissioning and Rehabilitation Action Plan (DRAP) and all sub components will be overseen by a Decommissioning and Rehabilitation Manager⁷ (D&R Manager) who will be fully accountable for all aspects of decommissioning and rehabilitation of the site, including oversight of any staff or contractors involved in implementing the plan. It is expected that operators will be required for cleaning and degreasing, electricians will be required for electrical rewiring and fitters for any mechanical decommissioning.

9.4. Standards and Performance Criteria

The D&R Manager will develop and then work to ensure the achievement of performance targets to ensure no harm to the environment, full compliance with all applicable environmental standards, safety of employees, contractors and the public during the DRP process, and achievement of standards suitable for the use of the property at its current zoning level.

9.5. Health and Safety Issues

During decommissioning and rehabilitation the site will continue to operate in accordance with the Workplace Health & Safety Act 1995, Workplace Health & Safety Amendment Act 2002, and the Workers Rehabilitation and Compensation Act, Workers Rehabilitation and Compensation Amendment Act 2001 & 2002.

Other regulations relating to health and safety, including the *General Fire Regulations 2000* and the *General Fire Amendment Regulations 2002*, will also apply. *The National Code of Practice for Manual Handling and Asbestos Safe Removal and Disposal in Industry 1994* will apply if required during decommissioning.

All confined space work will comply with *AS/NZS 2865:2001 Safe Working in a Confined Space*.

9.6. Site Surveys

An important part of the DRAP is to establish current contamination levels of soil and waters on the site. The audits conducted by the Gunns Limited *Safety, Health and Environment (SHE) System*, the regular reviews by the EPA Tasmania, the independent review undertaken by SEAM and the EPA Tasmania site inspection in 2012 suggest that there have been no major incidents throughout the history of operations at the site that may have resulted in legacy contamination issues that now require remediation. Sampling will be conducted as per the Site Contamination Assessment Plan. It is expected that sampling will be conducted in areas which may have experienced localised contamination, such as around the wood chip piles, the storage yard, the main log yard, the site of the main diesel tank and bowser and the water reclaim tanks.

9.7. Monitoring and Reporting

The following items are expected to be monitored during decommissioning and rehabilitation

⁷ Mr Bronte Booth, 0429 373 827

- Any earthworks and associated erosion or sediment discharge: this will be controlled by the use of silt traps.
- Noise: will be controlled by restricting the hours of work.
- Hydrocarbon contamination: will be controlled by site spill procedures.
- Use and disposal of chemicals: the D&R Manager will be responsible for ensuring chemicals are used and disposed by qualified and experienced operators and in a manner consistent with the EPN and all relevant legislation.

9.8. Documentation Records

Records will be kept of actions taken under the DRAP to ensure that there is written verification that the required procedures were followed and verifications were completed. The D&R Manager will be responsible for developing and maintaining documentation records which will be presented in report form by the company to EPA Tasmania at completion of the Plan.

9.9. Waste Management Plan

All identified contaminated soil will if necessary be removed from the site to an appropriate disposal facility. Identified contaminated water that cannot be treated on site will be removed from the site to an appropriate disposal or treatment facility. Solid waste will be disposed of in compliance with all relevant regulations. As no buildings are proposed to be removed, there is no expectation of asbestos removal; however, if asbestos removal becomes a requirement, this will be done in accordance with relevant regulations.

9.10. Heritage Considerations

No buildings on the site have heritage value. Gunns Limited identified no items of heritage value during their operations. However, as the site is cleaned and rehabilitated, if any signs of historical evidence or value are found the appropriate authorities will be informed.

9.11. Engineering Considerations

As all buildings are being retained, no engineering issues are envisaged at this stage with respect to buildings.

A separate contract for the removal of the ship loading facility will be let and the removal operation conducted in accordance with EP requirements.

9.12. Decommissioning and Removal of Buildings and Equipment Process

As noted above, the Site Contamination Assessment Plan will be drafted and submitted to EPA Tasmania for approval prior to being implemented. The analysis of results will then determine final clean-up and management requirements and reflected in the Remediation Plan. This will necessarily determine the final requirements for the specific sites listed below, where physical decommissioning is planned, as well as any further sites identified through the assessment or through site visits with EPA Tasmania.

The associated numbers identify the location of each item on the Site Map (Appendix A).

Ship Loader (1)

A separate contract for the removal of the ship loading facility located on the wharf from the site will be let. The contract will ensure that all requirements of the EPN and all appropriate regulations and guidelines, including relevant occupational health and safety regulations, are met.

Main woodchip pile (2) and Minor woodchip pile (2a)

Both woodchip piles still have a 'base layer' of woodchips, which are of no commercial value other than for gardening mulch. Where no alternative is available woodchips will be redistributed around the entire site at a thickness that avoids a tannin runoff risk ('gardening mulch' levels), focussing particularly on muddy areas and around plants.

Main holding dam (3)

The main holding dam has been subject to ongoing regular water monitoring analyses as specified in the EPN. Water, sludge and soil sampling, will be conducted in accordance with the Site Contamination Assessment Plan and remediated, if required, according to the Remediation Plan.

High Voltage Switch Yard (8)

The high voltage switch yard will be removed from the site.

Storage Yard (11)

The storage yard currently contains racks of wood, steel and wire, discarded pipes and has been used in the recent past to store drums of oil and fuel. The yard will be cleared of all material including hydrocarbons and hydrocarbon contaminated drums. Site soil samples will be taken in accordance with the Site Contamination Assessment Plan and any contaminated soil removed according to the Remediation Plan.

Main Log Yard (16)

The main log yard has had significant levels of mobile machinery working within it during the operational life of the Mill. Soil sampling will be undertaken to establish levels of contamination. Site soil samples will be taken in accordance with the Site Contamination Assessment Plan and any contaminated soil removed according to the Remediation Plan.

Diesel Tank/Bowser (19)

The main diesel storage tank for the site has appropriate concrete bunding but it is not known how long this bunding has been in place. The diesel tank, bowser and concrete bunding will be removed from the site. Site soil samples will be taken in accordance with the Site Contamination Assessment Plan and any contaminated soil removed according to the Remediation Plan.

Oil Separation Tank (20)

During the operation of the Mill, the Oil Separation Tank was used to capture waste oil from operations in the main workshop. All existing oil will be removed from the tank which will then be cleaned. The tank itself will be retained. Site soil samples will be taken in accordance

with the Site Contamination Assessment Plan and any contaminated soil removed according to the Remediation Plan.

Water Reclaim Tanks (21)

The two Water Reclaim Tanks were used to capture runoff from the site as part of the overall water management system. The tanks will be pumped out and both water and tanks removed from the site. The water reclamation system for the site will be removed once the site has been rehabilitated to an environmental standard no longer requiring such a system.

Water reclamation system

Once the site has been rehabilitated (and sources of tannin removed,) the water reclamation system will be removed from the site.

Removal of all woodchip conveyor systems

The woodchip conveyor systems surrounding the main woodchip pile and servicing the woodchip loader will be removed from the site and the area rehabilitated in line with the obligations of the EPN. Other than the partial conveyor, leading from the Screen house.

Buildings

All buildings will be rendered safe to required occupational health and safety standards. Any contamination risk will be removed and any significant contamination risk will be removed from site to an appropriate disposal or treatment facility.

9.13. Site Contamination Assessment

Triabunna Investments Pty Ltd is not aware of any major contamination incidents on the site or any incidents which required EPA Tasmania intervention. As noted earlier, there is the potential for localised contamination. Point 9.12 identifies the most likely areas where contamination may be found and provides specific actions according to each area. Additional areas of contamination may be identified during preparation and/or implementation of the Site Contamination Assessment Plan. Management and remediation of all of contamination identified at the completion of the implementation of the Site Contamination Assessment Plan will be addressed in the subsequently prepared Site Remediation Plan.

9.14. Geotechnical Assessment

There will be no significant change to the landform apart from distribution of woodchips around plants and in muddy areas.

9.15. Revegetation

Any requirements for revegetation will be discussed with EPA Tasmania during a Site Visit already scheduled for January 2014. Areas of the site, including new areas of bare or disturbed ground that may be prone to erosion and /or weed infestation will be revegetated, or otherwise stabilised to prevent or cause environmental harm.

9.16. Aesthetics

The removal of the ship loading facilities, the woodchip piles, the high voltage switch yard, diesel tank and bowser and associated concrete bunding, a number of water reclaim tanks

and conveyor systems and the general clean up and removal of discarded drums are expected to contribute to improve the visual aspect of the site. Any requirements for aesthetic improvement will be discussed with EPA Tasmania during a Site Visit already scheduled for January 2014.

9.17. Weed Management

The C&R Manager will undertake a site assessment of weeds, set objectives based on resources available and priorities, including the eradication of noxious weeds, and develop and implement an appropriate action plan. A combination of manual removal and chemical control may be used in this plan. Chemical weed control will only be undertaken by a fully qualified contractor, registered as a licensed weed controller and have approval by the EPA for all chemicals used on site. The Remediation Plan will include steps to ensure weeds are managed until revegetation has stabilised.

9.18. Identification of Priority Tasks and Timelines

The D&R Manager will develop a timeline for implementation of priority tasks, which will be discussed and agreed with EPA Tasmania.

10. KEY COMMITMENTS

NOTE: THE AIM IS TO COMPLETE ALL TASKS BY 30 JUNE 2014

Key commitments will be reviewed and agreed with EPA Tasmania upon agreement of priority tasks as listed in 9.18.

OBJECTIVES AND TARGETS	ACTIONS	COMPLETE BY
Removal of Ship Loading Facility	A separate contract to be let	To be determined by D&R Manager
Removal of woodchips on woodchip piles	Woodchips distributed around the site at a thickness which does not generate a tannin runoff risk	To be determined by D&R Manager
Rehabilitation of Main holding dam	Water sampling; drainage as appropriate Soil sampling of drained site; rehabilitation as appropriate	To be determined by D&R Manager
Removal of high voltage switch yard	Removal of switch yard from site	To be determined by D&R Manager
Clean-up and rehabilitation of Storage Yard	Material removed from site Soil sampling; rehabilitation as appropriate	To be determined by D&R Manager
Rehabilitation of Main log yard	Soil sampling; rehabilitation as appropriate	To be determined by D&R Manager
Removal of Diesel Tank and Bowser	Diesel storage tank, bowser and associated concrete bunding removed from site Soil sampling; rehabilitation as appropriate	To be determined by D&R Manager
Clean-up of Oil Separation Tank	Oil from tank removed from site Soil sampling; rehabilitation as appropriate	To be determined by D&R Manager
Removal of Water Reclaim Tanks	Tanks and tank-water removed from site	To be determined by D&R Manager
Demolition of Water Reclamation System	Once site is rehabilitated, system will be removed from site	To be determined by D&R Manager
Clean-up of Buildings	Buildings rendered environmentally benign and OH&S safe to required standards	To be determined by D&R Manager

11. COMPLETION OF PLAN

The DRP will be completed to the satisfaction of the Director, Environment Protection Authority Tasmania. This will be achieved within the time period outlined in the approved decommissioning and rehabilitation plan or within a time period otherwise approved by the Director.

The plan will be considered complete at a point where the Director is satisfied that the site is remediated.

ⁱ EPA Tasmania, 2011; Triabunna Investments Pty Ltd – Triabunna Chipmill Environmental Protection Notice 8631/2

ⁱⁱ EPA Tasmania, current; Decommissioning and Rehabilitation Plan Guidelines

ⁱⁱⁱ Gunns Limited, 2009; 2009 Public Environmental Report – Triabunna Woodchip Mill

^{iv} Ibid, pp. 13-17.

^v Environmental Protection Authority, 2010; Environment Protection Notice 7942/1 Gunns Limited Freestone Point Triabunna Woodchip Mill

^{vi} Gunns Limited, 2009; op cit.

^{vii} Ibid, p.8.

^{viii} Ibid, pp. 9-10.

^{ix} Ibid, pp. 21-31.

^x Ibid, p.34.

^{xi} Ibid, p.40.