



Your reference :
Our reference : EF13/3921; DOC15/268287-01
Contact : Mr Andrew Helms; (02) 6332 7604

Mr Chris Ritchie
Manager – Industry Assessments
Department of Planning & Infrastructure
GPO Box 39
SYDNEY, NSW, 2001

Attention: Ms Pamela Morales

29 July 2015

Dear Mr Ritchie

BORG PANELS (DA27/95 MOD 8) – EPA COMMENTS ON EIS

I refer to an email from Ms Pamela Morales of the Department of Planning & Environment to the Environment Protection Authority (EPA), dated 16 July 2015, seeking EPA comments on the Environmental Impact Statement prepared for Borg Panels and relating to the proposed installation of co-generation units at their Oberon facility (DA27/95 Mod 8).

The EPA has reviewed the EIS prepared by The Design Partnership, dated 26 June 2015, and offers the following comments and recommended conditions of approval should the modification be approved.

Air Quality:

Comments:

The EPA notes that:

- There has been little discussion in the EIS on exactly how the gas fired co-generation plants will function in relation to existing plant including the two heat plants;
- There has been no discussion on how the Co-generation plant will be 'plumbed' in to existing plant and whether there will be a need for a separate exhaust point for the new plant for emergencies or when there are shutdowns elsewhere on the facility;
- The air emission results from the two co-generation units, obtained when being run on digester gas reclaimed from a landfill, indicated likely compliance with Group 6 emission limits under Schedule 4 of the *Protection of the Environment Operations (Clean Air) Regulation 2010* (POEO (Clean Air) Reg). However, these results were obtained using an oxygen correction factor of 7% whereas the appropriate oxygen correction value for gas fired is 3% for all air impurities under Group 6 for fuel burning equipment using gas; and
- Borg is prepared to install an oxidising catalyst system on the co-generation plant to reduce emissions from these units if required however the EIS states that the units are capable of being tuned to meet the required Group 6 limits.

Recommended conditions:

1. The proponent must undertake post commissioning air monitoring of exhaust gases from the two co-generation units to demonstrate that these units comply with the POEO (Clean Air) limits for Group 6 plant. The air monitoring must include, but not necessarily be limited to, nitrogen oxides and volatile organic compounds and be undertaken using reference conditions "Dry, 273 K, 101.3 kPa, 3% Oxygen" as per Schedule 5 of the POEO (Clean Air) Reg.

This monitoring must be undertaken within one (1) month of the commissioning of the two co-generation units

Noise:

The EPA notes that:

- There is no discussion in the Noise Impact Assessment report (Attachment B of the EIS) on whether the operation of the co-generation plants is likely to produce any tonality or low-frequency sound emission issues;
- There is no detailed explanation of how the generator exhaust sound pressure level is attenuated from 120 dB(A) at 1 meter to 68 dB(A) at 1 metre as described in the last dot point and in Table 8 on page 12 of Noise Impact Assessment respectively;
- In the cumulative noise levels described in Table 11 of the Noise Impact Assessment, it is stated that the contribution from the existing Borg Operations was based on the L_{A90} measurements made during a December 2014 noise compliance assessment. Table 5 provides L_{A90} measurements from the December 2014 noise compliance assessment which are different to the noise levels for the existing Borg Operations provided under Table 11. It is understood the L_{A90} numbers used in Table 11 were the measurements made during 'attended' monitoring and not the 'unattended' monitoring as summarised in Table 5. These numbers are, however, mostly comparable with the 'unattended' L_{A90} values;
- There has been no discussion or explanation as to why the contribution from the Borg facility at receiver R1, in the evening, is greater than receivers that are closer to the Borg facility;
- While the EIS provides no details on the nature of the noise attenuation to be undertaken at the co-generation unit enclosures, Section 6.3 of the Noise Impact Assessment states that the enclosures will be lined with 50 mm thick Rockwool sheets; and
- The noise impact assessment report concludes (Section 10) that it is "highly likely" that noise from the existing Oberon Timber Complex would "mask" noise emissions from the co-generation plants

Recommended conditions:

1. The co-generation units must be acoustically treated in order to achieve the predicted levels that have been described in the Noise Impact Assessment.
2. The proponent must undertake post commissioning noise monitoring to demonstrate that the operation of the co-generation plants does not result in the exceedance of noise limits at noise sensitive receivers as identified in Section 7.0 of the Noise Impact Assessment.

This monitoring must be undertaken within one (1) month of commissioning of the two cogeneration units.

Should you have any further enquiries in relation to this matter please contact Mr Andrew Helms at the Central West Regional Office (Bathurst) of the EPA by telephoning (02) 6332 7604.

Yours sincerely



DARRYL CLIFT
Head Central West Unit
Environment Protection Authority