



Our reference : EF13/3921; DOC14/291821
Contact : Andrew Helms, (02) 6332 7604

Mr Victor Bendevski
Environmental and Regulatory Compliance
Borg Panels Pty Limited
Private Bag 1
OBERON NSW 2787

28 November 2014

Dear Mr Bendevski

BORG PANELS – PROPOSED COGENERATION PLANTS

I refer to your letter to the Environment Protection Authority (EPA) dated 24 November 2014 in relation to Borg Panels Pty Limited's (Borg Panels) intention of commissioning two cogeneration units at your Oberon facility.

The Environment Protection Authority (EPA) has reviewed your proposal, as summarised in your letter, and offers the following comments in relation to your proposal with respect to the potential for air and noise impacts resulting from the commissioning of two units.

Air quality:

The EPA has reviewed technical information available on the manufacturer's website for the proposed Deutz TBG 620 V12K units and notes the generic emission figures provided for those units run on natural gas. These figures state that exhaust emissions of <math><500 \text{ mg/m}^3</math> for nitrous oxides and <math><300 \text{ mg/m}^3</math> for carbon monoxide – a volatile organic compound substitute – can be attained when an oxidising catalyst is utilised (and using an oxygen reference condition of 5%).

The EPA draws Borg's attention to the air quality limits stipulated within Schedule 4 of the *Protection of the Environment Operations (Clean Air) Regulation 2010* which state that for this type of 'Group 6 plant' (plant that first commenced operations after 1 September 2005), nitrous oxide concentrations must be less than 450 mg/m^3 and volatile organic compounds/carbon monoxide must be less than $40 \text{ mg/m}^3 / 125 \text{ mg/m}^3$ respectively (with an oxygen reference condition of 3%).

Borg must seek assurances from the manufacturer of these units that the Group 6 limits described above can be achieved. If no such guarantee can be provided by the manufacturer then Borg will need to source an aftermarket emission control device to ensure that these emission standards can be met.

The EPA will require Borg to undertake post commissioning testing to demonstrate compliance with the Clean Air Regulation regardless of whether the manufacturer claims the limits can be met or if aftermarket emission controls need to be fitted to the cogeneration units.

Regarding your question on whether additional air monitoring points are required, I wish to advise that new discharge monitoring points may be required as there will be times when the exhaust gases from these units are discharged directly to the environment.

Noise:

Your letter states that the cogeneration units will be housed within 'noise reducing enclosures' completely sealed from the outside environment and lined with 'appropriate noise absorbing materials'. Your letter also states that the current environment protection licence 'provides for the noise requirements' associated with the operation of the units.

The plant specifications for the Duetz TBG 620 V12 K states an exhaust noise of 120 dB(A) and an air-borne noise of 102 dB(A). The licence night time noise limit is 45 dB(A). While you may state the plant will be housed within a completely sealed noise reducing enclosures that will be lined with "appropriate" noise absorbing material, you need to provide information that demonstrates that the noise reducing enclosures will achieve sufficient noise attenuation such that the operation of the two cogeneration units will not lead to an increase in the local noise environment and the potential to exceed the premises' noise criteria – particularly the night time limit of 45 dB(A). The EPA would require that noise monitoring be undertaken following the commissioning of these units to ensure that the required level of attenuation has been achieved.

The EPA requests that this additional air and noise information be provided to its Central West Office prior to the commissioning of the two cogeneration units. In providing the additional information, the EPA also requests that Borg confirms that the proposed operation of the units is allowable under the development consent DA 27/95 (and subsequent modifications) for the premises.

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

Yours sincerely



DARRYL CLIFT
Head Central West Unit
Environment Protection Authority