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Contact : Mr Andrew Helms, (02) 6332 7604

Ms Joanna Bakopanos
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GPO Box 39
SYDNEY, NSW, 2001

Attention: Ms Pamela Morales

20 December 2016

Dear Ms Bakopanos

BORG PANELS – PROPOSED EXPANSION OF OBERON FACILITY (SSD 7016)
EPA comment on Borg Panels' Response to Submissions

I refer to your email on behalf of the Department of Planning and Environment (DPE) and received by the Environment Protection Authority (EPA) of 26 October 2016 seeking comment on the Response to Submission (RTS) for the Borg Panels expansion project described above.

The EPA has reviewed the RTS, including the latest Air Quality Impact Assessment (AQIA) prepared by Todoroski Air Sciences and received by the EPA on 14 December 2016, and makes the following comments:

Air Quality:

The EPA is satisfied that the RTS and the AQIA address earlier concerns regarding data gaps and limitations with air modelling that were present in the original Environment Impact Assessment – particularly with respect to the modelled formaldehyde exceedences beyond the premises boundary. Specifically, the EPA notes that:

- Modelling indicates that the emissions from the existing facility and the proposed project are unlikely to exceed the air quality criteria for both cumulative 24-hour average PM₁₀ (with the exception of receptor 2 – a playing field) and NO₂ at any sensitive receptor;
- The most recent modelling of formaldehyde concentrations indicates that there is likely to be an exceedence of the EPA's impact assessment criterion of 20µg/m³ at 25°C, or 21.8 µg/m³ at 0°C (*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*), beyond the south-eastern corner of the premises;
- The modelling indicates that the formaldehyde exceedence would only be likely to occur on nine hours in a year in a small portion of the north-western corner of the neighbouring ANL wood waste storage yard (an industrial zoned block). No formaldehyde criterion exceedence is predicted to occur at any publically accessible land;
- The modelling uses a conservative approach for input parameters relating to formaldehyde including the use of 'average plus standard deviation' historical monitoring results, and formaldehyde 'destruction efficiencies' of 30% when it is likely that higher efficiencies will be achieved; and
- The AQIA concludes that the proposed project, including alterations to the existing MDF facility, will lead to an improvement in air quality, formaldehyde emissions in particular, beyond the premises boundary.

The EPA also notes the reference in the AQIA to the less conservative World Health Organisation (WHO 2010) criterion for formaldehyde of 100 µg/m³ (over a 30 minute averaging period). A statement is made in the AQIA that this figure is based on more recent knowledge of the health impacts associated with formaldehyde exposure. This criterion is not one that is currently endorsed by the EPA.

The EPA acknowledges that the proponent is committed to installing and utilising best available technologies both in the existing MDF facility and at the proposed Particle Board Factory. These technologies include (i) the installation of cyclones for process particle capture, (ii) a wet electrostatic precipitator and scrubber system for the dryer with exhaust gas circulation and (iii) best available press suction system for the press exhausts. Furthermore the proponent is also willing to undertake further investigations, by way of a pollution reduction program on the Environment Protection Licence, to identify further feasible and reasonable measures to reduce air emissions from the existing MDF facility.

EPA's recommended conditions of project consent:

- The proponent must (within an appropriate timeframe), undertake post commissioning air monitoring at all air discharge points identified in the AQIA and which formed the basis of the air modelling. The proponent must prepare a report utilising the results of this air monitoring to validate the conclusions reached from the air dispersion modelling undertaken as part of the Project's AQIA.
- The proponent shall, within 3 months of the completion of the post commissioning air emission validation report described above, enter in to a pollution reduction program with the EPA to implement those work programs outlined in Section 8.1 of the AQIA (Todoroski Air Sciences, 13 December 2016); and
- The proponent will need to make an application to the EPA, should project consent be granted, to vary the Environment Protection Licence to update all air monitoring/discharge points, associated air pollutant limits and air monitoring requirements to reflect the changes to the Borg Panels Oberon facility.

Noise impacts:

In its submission of 2 August 2016, the EPA recommended a range of conditions relating to noise emissions. The proponent has queried a number of these recommendations and these are discussed below:

In relation to dot point 6 of the EPA's submission – recommendations regarding the use and enclosure of mobile wood chippers;

- (sub-point 1) The EPA agrees with the proponent's acoustic consultant in that the operation of mobile wood chippers, post commissioning of the Particle Board Factory, should be permissible without the need for an acoustic enclosure. The requirement for an acoustic enclosure of any mobile chipper should be dependent upon the mobile chipper's ability to be in compliance with noise limits stipulated in the facility's Environment Protection Licence.
- (sub-points 2 and 3) In light of the change to the recommendation above (sub-point 1) the EPA recommends that DPE requires the proponent to implement the restrictions on mobile wood chipper operation under the weather conditions stated in sub-points 2 and 3 and that they be incorporated in to the 'Mobile Wood Chipper Operation management Plan' as per sub-point 4. The EPA notes that the proponent's acoustic consultant considers these operational restrictions to be reasonable and feasible.

In relation to dot point 9 – updating the site noise model following compliance monitoring – the EPA can confirm that the intention of this recommended condition was for the proponent to update the site noise model by utilising the results of sound power level compliance testing (from requirements of dot point 8). The EPA agrees with the proponent's acoustic consultant that the site noise model should only be updated if the compliance testing shows that sound power levels are greater than those modelled in the Noise

Impact Assessment (NIA). If sound power levels are consistent with that reported in the NIA then the proponent need only report the results of the compliance testing.

Surface Water impacts:

In its submission the EPA sought confirmation from the proponent that stormwater harvesting will be deployed as part of the surface water management practices at the premises. The proponent has confirmed, through the RTS, that stormwater harvesting is an integral part of the surface water management practices at the premises. The EPA has no further comment on surface water in addition to that already made in its submission.

The EPA confirms that the recommended conditions of project consent relevant to surface water management made in the 2 August 2016 submission are still appropriate.

Waste:

In its submission the EPA also requested addition information in relation to the expected volumes of waste material generated on site and the waste water treatment facility's ability to manage the additional effluent generated by the processes associated with the project. The RTS adequately answers these information gaps and the EPA has no further comment on waste management.

The EPA confirms that the recommended conditions of project consent relevant to waste made in the 2 August 2016 submission are still appropriate.

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

