

# **Statement of Environmental Effects**

## **Proposed S4.55 (1A) Modifications to Timber Manufacturing Facility**

### **Modification 4 Improved layout**

Borg Panels

124 Lowes Mount Road, Oberon NSW

Borg Panels Pty Ltd

21<sup>st</sup> October 2021

## Revision History

Rev No.	Revision Date	Author / Position	Details	Authorised	
				Name / Position	Signature
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# 1 Introduction

## 1.1 Background

On 29 May 2017 Development Consent SSD 7016 was granted by the Minister for Planning to construct a Particle Board manufacturing facility, modify the existing Medium Density Fibreboard (MDF) manufacturing facility and undertake general site works (the Project) at the existing Borg Panels timber manufacturing facility located on 124 Lowes Mount Road, Oberon. The Project area is known as Lot 1 DP 1085563, Lot 2 DP 1085563, Lot 31 DP1230464, Lot 24 DP 1148073 and Lot 33 DP1228591.

This Statement of Environmental Effects (SEE) has been prepared for modifications to the timber manufacturing facility, approved by Development Consent SSD 7016, including:

- Increase in the size of the hardstand at the North Eastern corner of the site, by reclaiming the remaining portion of the spring fed dam, to facilitate the relocation of the existing site mechanic's workshop.
- Modernisation of the old multidaylight press used for producing medium Density Fibreboard and changes to its exhaust air emissions.
- Addition of an enclosure to the site water treatment biological tanks
- Installation of additional Reverse Osmosis filtered water production.
- Construction of a new bunded chemical storage shed for the water treatment plant.
- Construction of an additional line effluent storage dam for the water treatment plant
- Construction of a new road with-in the site to better facilitate traffic flow.

This SEE addresses the matters referred to in Section 4.15 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

## 1.2 Existing Development

Borg Panels operates a Medium Density Fibreboard and Particleboard manufacturing facility in Oberon, NSW. This facility manufactures a range of Customwood MDF and Particleboard products including:

- Standard MDF;
- Moisture Resistant MDF;
- E0 (Low Formaldehyde Emitting) MDF;
- Ultraprime MDF Mouldings.
- Decorative Laminated MDF and Particle Board; and
- Treated paper for the lamination of MDF and Particle Board.
- Raw Standard Particleboard for joinery and laminating applications

- Raw Moisture Resistant Particleboard for joinery and laminating applications
- Particleboard flooring products for structural applications

The facility consists of a MDF and Particleboard manufacturing plant, mouldings plant, paper treatment process, laminating plant, decorative finishing and cut to size value add operations.

The approved maximum output of the facility is 380,000m<sup>3</sup> of MDF and 500,000m<sup>3</sup> of particleboard per calendar year. No changes are proposed to the outputs of the site as part of this modification.

### **1.3 Approved Development**

The Existing Development includes operation of a Medium Density Fibreboard and Particleboard facility, alterations and additions to the Existing Development, which include:

- Construction and operation of a dedicated particle board manufacturing line, which includes:
  - Production of chips from fresh round wood.
  - Production of chips and flakes from waste wood.
  - Production of flakes from fresh produced chip.
  - Wood drying process.
  - Sorting and cleaning of dried chip.
  - Addition of resins and additive chemicals.
  - Forming, pre-pressing, and thickness pressing of chip.
  - Cutting, cooling and stacking; and
  - Final sanding and processing of finished product.
- Expansion and modernisation of the existing MDF and laminating operations, largely located within existing structures on site to include provision of additional infrastructure and value add to existing products.
- MOD1- Re-orientation of the Materials handling building, northern warehouse and reclamation of the spring dam.
- MOD2- Installation of an Electricity Generating Co-generation Turbine and high-pressure gas pipeline.
- MOD 3- Improved Recycling- Installation of more equipment to better recycle wood at site, improved truck loading/unloading areas and improvement to the surface water conveying channels.

## 1.4 Proposed S4.55 Modifications to Approved Development

The proposed modifications to the approved Timber Panel manufacturing facility are shown in the accompanying MOD 4-Improved Layout Drawing Package and include:

- Reclamation of the remaining spring fed dam area to facilitate the increase in hardstand area and continue groundwater extraction from the spring fed dam aquifer to reduce potential for ground water mounding.
- Relocation & expansion of the existing mechanic's workshop to the newly created reclaimed spring dam hardstand area, including installation of new an automated truck washing bay and refuelling area.
- Improvements to the MDF MDL plant and changes to the air emission points associated with it and changes to paper treater exhaust (historical EPA pt. 23).
- Improvements and additions to the site water treatment plant including installation of additional RO production capacity and construction of a new effluent basin, an enclosure to the site water treatment biological system tanks and a new bunded chemical storage area for site use.
- Construction of an additional internal road to provide better access to the relocated mechanic's workshop.

The proposed development will have limited environmental impact given that the changes are considered minor in nature and are contained within the approved development area. The changes will allow the Timber Panel Manufacturing Facility to operate more efficiently and will reduce overall impacts. The modification is substantially the same and is consistent with the prevailing legislation as outlined in this statement.

Therefore, the proposed modification is classified as a 1A modification under section 4.55 of Environment Planning and Assessment Act

A detailed description of the proposed modifications is provided in **Section 4** of this SEE.

## 1.5 Project Justification

The major project is approaching completion and further opportunities to improve process and site efficiencies have been identified, they are described below.

As the Borg Panels Oberon manufacturing facility has evolved and the operational activities have progressed the need for improved infrastructure to support the existing activities and the requirement for further ancillary activities have arisen. These minor alterations and additions as shown in Figure 1 below supplement the original approved primary purpose of the development and require assessment against the EP&A Act and form part of this application, *MOD 4- Improved Layout*.

Further reclamation of the remaining portion of the spring fed dam, a dam which was created on site in the late 1990s as a borrow pit for construction works, will allow the increase of the available hard stand and parking areas at the North eastern location of the site, and facilitate the relocation and expansion of the existing mechanical workshop.

Construction of larger mechanical repair workshop is required for our growing fleet of vehicles. The current workshop contains only 4 bays, the new workshop will contain 7 bays and will include a dedicated automated truck washing machine, refuelling area and parking for large vehicles. The mechanics workshop relocation and improvements will provide a safer working environment for the employees and reduce congestion within the site as the workshop area be removed from the main site general activities related with the production of reconstituted wood products.

Improvements and modernisation of the Medium Density Fibreboard MDL plant is required due to its age and availability of the spare parts. Borg produce a large range of panel thicknesses across their MDF producing press lines and the modernisation of this plant is required to ensure efficiency and competitiveness is maintained. Changing material thicknesses during manufacture significantly impacts uptime and quality is compromised each time the thickness is varied. This project will also combine the air emission (EPA pts 18) press vent fans and the historical paper treater EPA Pt. 23 into one common dedicated exhaust air cleaning system Licensed Discharge Point. The improvement does not change project capacity or potential of pollution generation of the plant but rather makes the manufacture more efficient.

The site operates a Water treatment plant to recycle all the effluent produced from the production activities. The water treatment plant includes biological digestion and various filtration processes to ultimately produce clean water, via Reverse Osmosis filtration. During the colder months the process of RO filtration is impacted as the overall system temperature is reduced, this is usually also further disadvantaged with extra rainfall (particularly over the last 2 years) and thus a greater influx of surface water into the Water treatment plant. Installation of an enclosure to the site water treatment biological system tanks, addition of RO production capacity, construction of a new effluent basin and installation of new bunded chemical storage area for site will provide the buffer capacity required and throughput ability for the site to operate with more reliability and certainty.

Changes are required to the surface water conveying channels along the Eastern boundary to facilitate a second internal access road, construction of the new effluent dam and hardstand. The changes to the internal access road will provide separate access to the newly constructed workshop.

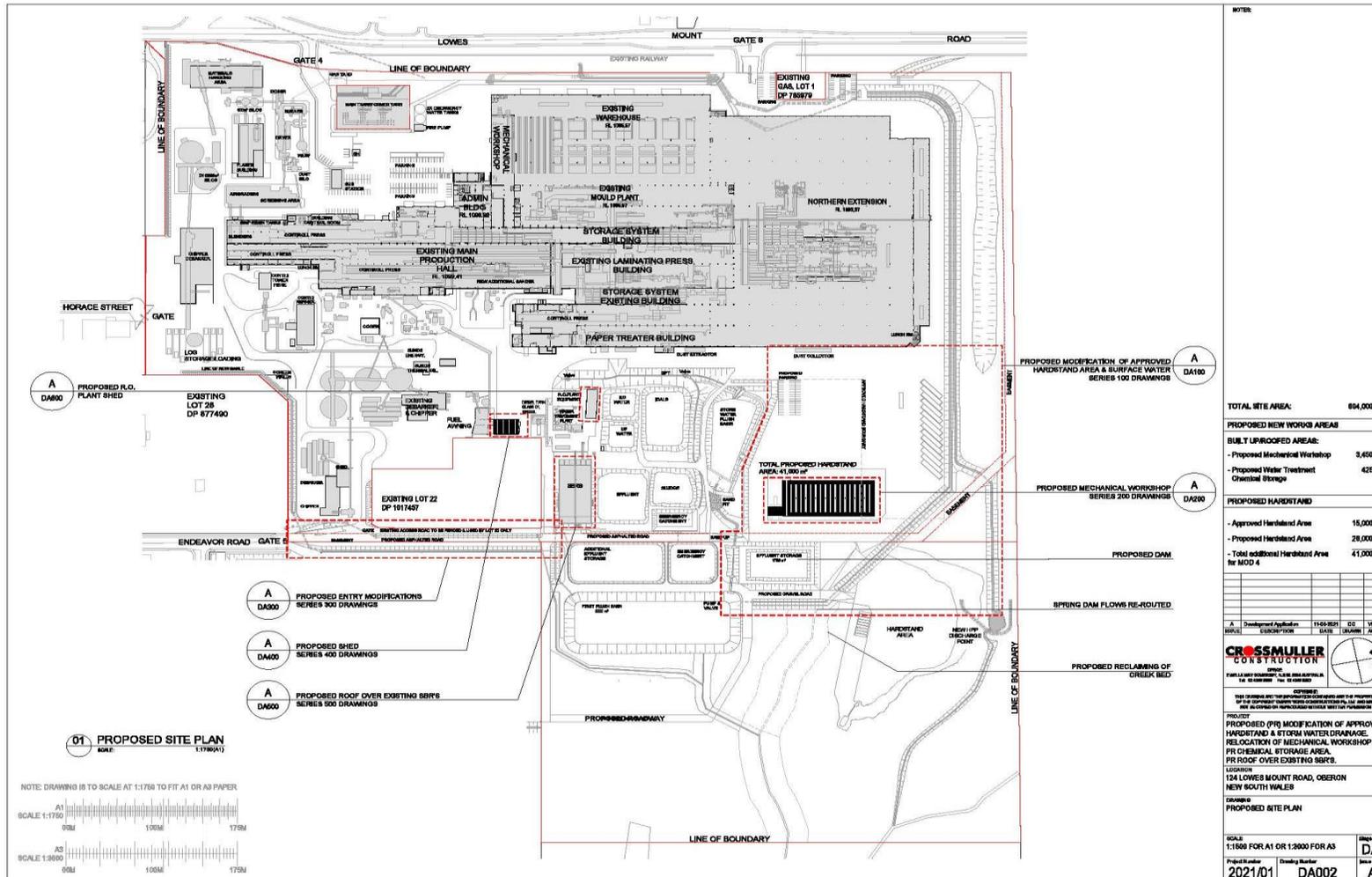


Figure 1- Proposed site modifications

## 1.6 Capital Investment Value

The proposed modification has a capital investment value of approximately \$5 Million.

## 1.7 Consultation

Preliminary discussions have been carried out with Department of Planning & Environment via a pre-development application meeting regarding the proposed modifications. Borg has contacted Tim Baker, Senior Water Regulation Officer- Natural Resources Access Regulator, but has not received a response.

## 1.8 Structure of the SEE

This SEE details the proposed S4.55 modifications and assesses the environmental impacts of those modifications, as follows:

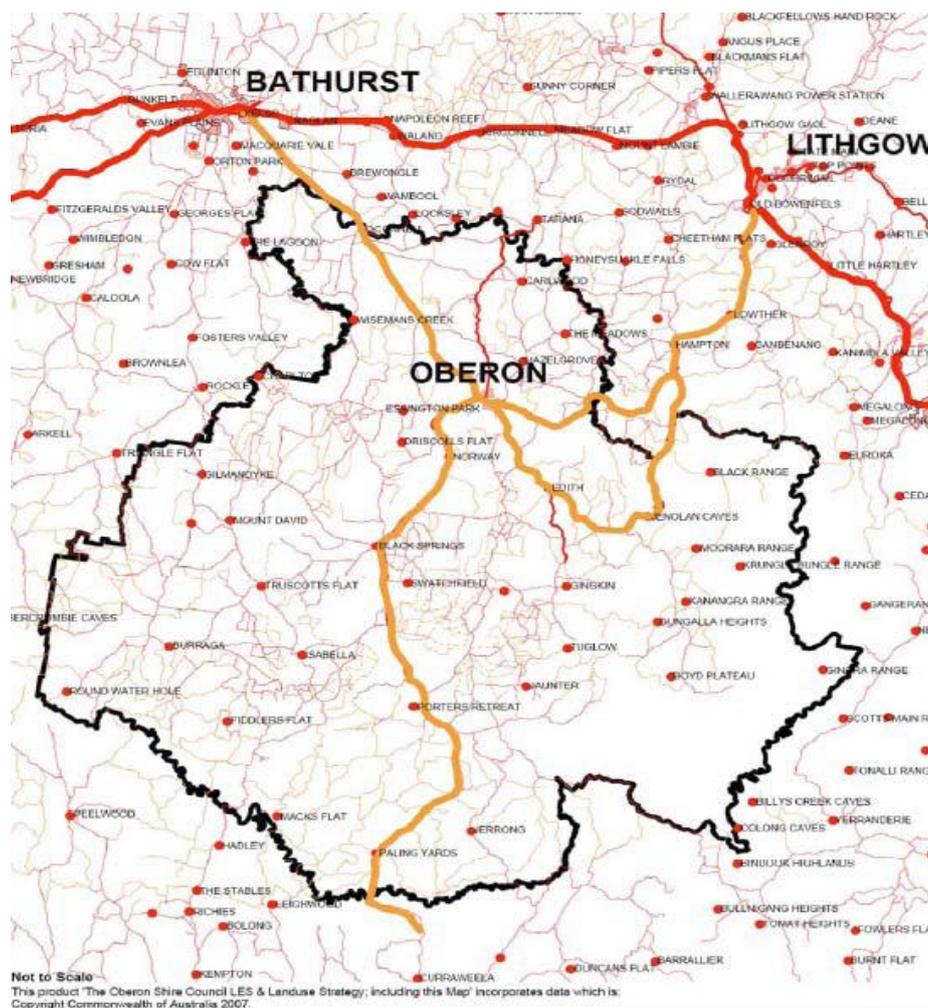
- **Section 2** – Site Description
- **Section 3** – Planning Matters
- **Section 4** – Proposed S4.55 Modifications
- **Section 5** – Environmental Impact Assessment
- **Section 6** – Conclusion

## 2 Site Description

### 2.1 Location and Context

#### 2.1.1 Regional Overview

The Oberon LGA covers an area of 3,626km<sup>2</sup> and lies approximately 195 kilometres to the west of Sydney in the NSW Central Tablelands. Refer **Figure 1**.



**Figure 2 Site Context**

The LGA borders the City of Lithgow to the north, Blue Mountains to the east, Wollondilly to the south-east, Goulburn/Mulwaree and Upper Lachlan to the south and Bathurst Regional to the south-west.

The LGA has a population of 5,270 with much of the population living in the Oberon township (being 2,459 people). In addition to the main settlement of Oberon there are several small villages (including Black Springs, Burruga and Mt David) as well as rural localities.

The primary industries within the LGA are agriculture (including sheep and beef farming, as well as plantation timber forestry operations) and industries associated with logging, sawmilling and timber machining along with the manufacture of wood products.

The subject land is located on the northern outskirts of Oberon, to the east of Lowes Mount Road. The Borg operations are part of the wider Oberon Timber Complex, with facilities operated by several separate companies, which generally involve timber product manufacture or association with the Timber Complex via the provision of engineering services. The approved Project area is shown in **Figure 2**.



Figure 3- Project Area

### 2.1.2 Surrounding Land Use

The Project is located within an existing industrial zoned area. Industrial zoned land adjoins the Project to the south and west. Rural zoned land adjoins the site to the north and east. Refer **Figure 3**.

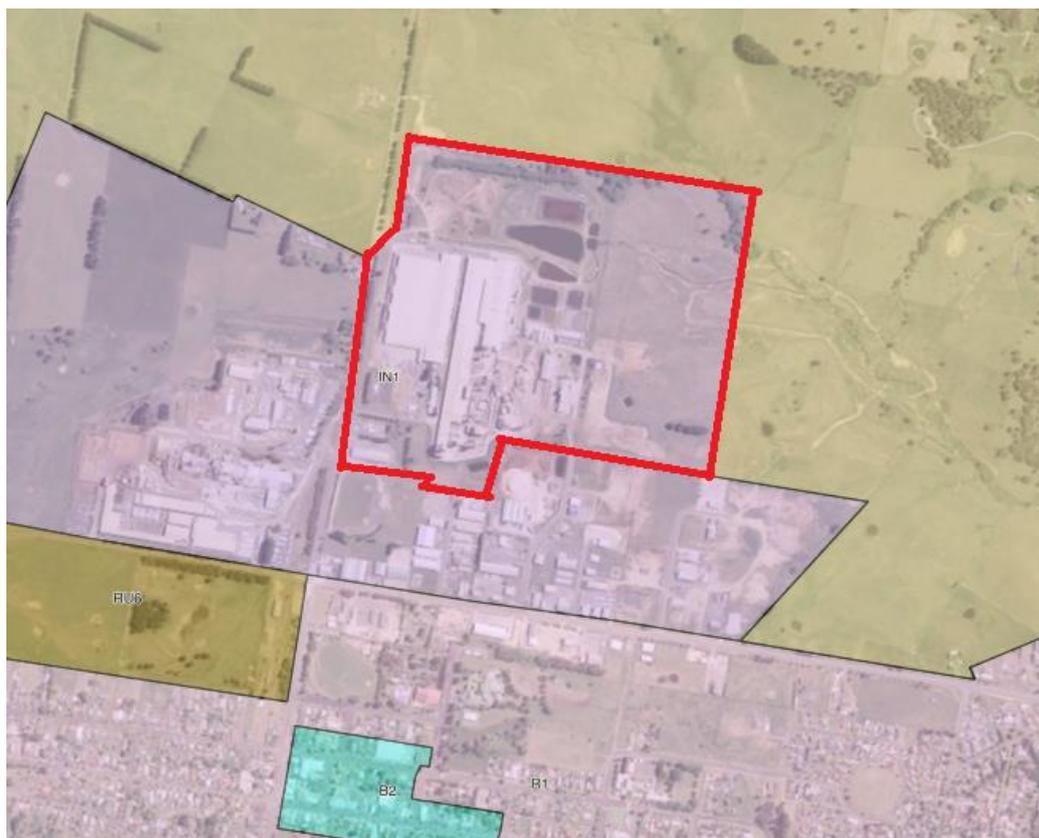


Figure 4 - Zoning Context

### 2.1.3 Site Description

The Project area is known as Lot 1 DP 1085563, Lot 2 DP 1085563, Lot 31 DP1230464, Lot 24 DP 1148073 and Lot 33 DP1228591. All land is under the ownership of Borg Panels.

## 2.2 History

After commencing the manufacture of thermo laminated vinyl doors in Charmhaven in the early 1990's, Borg has established itself as a leading Australian manufacturer of melamine panels and components for all joinery applications.

Borg manufactures a range of joinery materials including Polytec Doors (primarily for kitchen and bathroom use), white melamine panels, decorative melamine board products, shelving components, and Createc. With a commitment to Australian manufacturing, Borg focuses much of its activities on manufacturing plants throughout the East Coast (including a world class manufacturing plant at Charmhaven, a 45,000m<sup>2</sup> manufacturing and distribution centre at Somersby and the Oberon complex).

Experiencing significant growth over the past two decades, Borg has continued to invest in leading edge, world class machinery across its manufacturing sites. Ensuring the production of the highest quality product in the most cost-effective manufacturing processes is integral to Borg's intent of delivering superior value to its customers.

In March 2010, Borg acquired the former Carter Holt Harvey Oberon Medium Density Fibreboard (MDF) facility at Oberon and a few months later, acquired the associated JeldWen door skin factory located adjoining the MDF plant.

Since that time Borg have improved and modernised the existing plant through modifications to the original DA 27/95.

Application was made to DP&E in April 2015 to construct and operate a particleboard facility and make alterations and additions to the existing MDF facility. This application also sought to remove the Borg Panels operations from DA27/95 (that applies to the OTC) and consolidate all Borg operations under a new single development consent.

Project approval (Development Consent SSD 7016) was granted by the Minister for Planning on 29 May 2017 to construct a Particle Board manufacturing facility, modify the existing Medium Density Fibreboard (MDF) manufacturing facility and undertake general site works (the Project). Since that time operation of the particleboard project has begun and three modifications to development consent SSD 7016 have been approved, these are:

MOD1- Material handling building, northern warehouse and reclamation of the spring dam.

MOD2- Turbine and high-pressure gas pipeline.

MOD3- Improved Recycling, improved truck loading/unloading areas and changes to the surface water management system

## **3 Planning Matters**

This section deals with the proposal's consistency with the various statutory and non-statutory provisions. It also addresses the relevant matters for consideration under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979*.

### **3.1 Commonwealth Matters**

#### **3.1.1 Environment Protection and Biodiversity Conservation Act 1999**

Ecological studies undertaken as part of the EIS (The Design Partnership, June 2016) for the Project determined the site has limited biodiversity value and the Project did not trigger any Matters of National Environmental Significance. Therefore, no Referral was required. The proposed S4.55 modifications are within the assessed Project footprint and will not affect ecology.

### **3.2 State Matters**

#### **3.2.1 Environmental Planning and Assessment Act 1979**

The *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) provide the framework for development and environmental assessment in NSW.

As stated in the EP&A Act, the project is classified as State Significant Development (SSD) pursuant to Part 4 Section 89C of the EP&A Act, if it is declared as SSD by a State Environmental Planning Policy or declared SSD by order of the Minister for Planning in the Government Gazette.

The Project was classified as State Significant Development (SSD) as set out in Clause 4 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) (2011) (SEPPSRD).

Development Consent SSD 7016 was granted by the Minister for Planning on 29 May 2017 to construct the Particle Board manufacturing facility, modify the existing Medium Density Fibreboard (MDF) manufacturing facility and undertake general site works (the Project) at the existing Borg Panels facility located on 124 Lowes Mount Road, Oberon.

During construction of the Project, a number of minor modifications have been identified to improve the operability of the project. This application is being made to modify Development Consent SSD 7016 as described in **Section 4**, and summarised as follows:

- Increase in the size of the hardstand at the North Eastern corner of the site to facilitate the relocation & expansion of the existing mechanic's workshop, including an automated truck washing bay.
- Reclamation of the remaining spring fed dam area to facilitate the increase in hardstand but continue groundwater extraction from the spring fed dam aquifer to reduce potential for ground water mounding.
- Modernise the MDL MDF plant which includes changes to the site air emission points including EPA pt. 18 and to the paper treater exhaust, historical EPA pt. 23.
- Improvements and additions to the site water treatment plant including an enclosure to the site water treatment biological system tanks, addition of Reverse Osmosis production capacity, construction of an additional line effluent dam and construction of new bunded chemical storage area for site use.
- Minor alterations to site stormwater conveying channels to facilitate the expansion of the hardstand.
- Construction of a new access road with-in the site to better facilitate traffic flow.

These proposed modifications are predominantly to improve the operability and efficiency of the site, improve the amenity of the workplace, increase the uptime of ancillary equipment, and reduce the potential impacts of the project on the surrounding environment.

The modifications are sought under *S4.55 (1A) Modifications involving minimal environmental impact* of the EP&A Act. This SEE demonstrates the proposed modifications are of minimal environmental impact, and that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted.

Section 4.15(1) of the EP&A Act sets out the matters for consideration. These are shown in **Table 1**.

**Table 1 – Section 79C Matters for Consideration**

<p><b>(1) Matters for consideration—general</b></p> <p><b>In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:</b></p>	
<p>(a) (i) any environmental planning instrument, and</p>	<p><b>Section 3</b></p>
<p>(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and</p>	<p>No proposed instrument is applicable to this application.</p>
<p>(iii) any development control plan, and</p>	<p>Development Controls Plans do not apply to State Significant Development. However, consideration of the Oberon Council Industrial DCP was undertaken in the EIS (The Design Partnership, June 2016) for the Project. The proposed modifications are substantially the same as the approved Project.</p>
<p>(iii) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and</p>	<p>No Planning Agreement has been entered into under Section 93F.</p>
<p>(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and</p>	<p><b>Section 3</b></p>
<p>(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979),</p>	<p>No Coastal Management Plans apply.</p>
<p>(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</p>	<p><b>Section 5</b></p>
<p>(c) the suitability of the site for the development,</p>	<p>The site is already developed for the purposes of timber manufacturing with an approved particleboard plant under construction. The proposed modifications are substantially the same as the approved Project.</p>

<p><b>(1) Matters for consideration—general</b></p> <p><b>In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:</b></p>	
<p>(d) any submissions made in accordance with this Act or the regulations,</p>	<p>Any submissions made in accordance with the Act or the regulations will be addressed following any exhibition period.</p>
<p>(e) the public interest.</p>	<p>The Project is in the public interest as it minimises the current impacts from the development (in regard to both air and noise pollution) whilst increasing regional employment. The proposed modifications are substantially the same as the approved Project.</p>

### 3.3.2 Environmental Planning and Assessment Regulation 2000

Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* sets out the criteria for designated development.

The Project was classified as a Wood Processing Facility, and approved to manufacture 380,000m<sup>3</sup> of MDF board per year and 500,000m<sup>3</sup> of particleboard per year. On this basis the Project is designated development.

## 3.3 State Environmental Planning Policies

### 3.3.1 State Environmental Planning Policy (State and Regional Development) 2011

The Project is 'State Significant Development' in accordance with Division 4.1 of Part 4 of the EP&A Act, as it is triggered as a timber processing facility under Clause 4, Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011. Specifically, the following provision triggers the proposal as State Significant Development:

*Development that has a capital investment value of more than \$30 million for any of the following purposes:*

- a) *milling plants, sawmills, log processing works, wood-chipping or particle board manufacture*

### **3.3.2 State Environmental Planning Policy 33 – Offensive and Hazardous Development**

State Environmental Planning Policy 33 –Hazardous and Offensive Development (SEPP 33), clause 12 outlines that a Preliminary Hazard Analysis screening test must be undertaken to determine the risk of the proposal.

A potentially hazardous industry is defined within SEPP 33 as a development for the purpose of any industry which, if the development were to operate without employing any measures to reduce or minimise its impact, would pose a significant risk to human health, life or property, or to the biophysical environment.

An assessment of the Project in accordance with Hazardous and Offensive Development – Applying SEPP 33 was undertaken during preparation of the EIS (Sherpa Consulting May 2016) for the Project and concluded that the Project is not offensive or hazardous.

As part this modification there is no change to the purpose or the scale of the activities being undertaken at the development. The proposed changes will improve the reliability and efficiency of the site activities, reduce the environmental impacts of the development and not change the chemical inventory manifest of the site

## **3.4 Local Matters**

### **3.4.1 Oberon Local Environmental Plan**

The Project is located within the Oberon Council Local Government Area. As a result, the provisions of the Oberon Local Environmental Plan 2013 (LEP) need to be considered as part of this SEE.

The subject land is zoned IN1 – General Industrial (**Figure 3**). The proposed development is consistent with the objectives of the zone as set out under the provisions of the LEP.

The Project was designed to minimise adverse impacts on other land users. The Project and its subsequent modifications will also assist in ensuring the economic viability of the site, ensuring the continuation of employment for the local community and having the obvious flow on effects in terms of social & economic benefits to local settlements (including the Oberon town itself as well as surrounding areas).

This S 4.55 (1A) modification remains in line with the above commitments to improve site amenity, reduce environmental impacts and ensure long term economic viability of the site.

The Project as approved meets the definition of heavy industry as a permitted use within the zoning and is identified as being part of the Oberon Timber Complex. This Section 4.55 Modification does not alter the use.

The Oberon Timber Complex has certain protections in the Oberon LEP. Clause 6.6 of the Oberon LEP notes requirements for land located within an industrial buffer zone, as shown on the Industrial Buffer Map in the OLEP 2013 (**Figure 4**). The objectives of Clause 6.6 Development within a Designated Buffer Area of the OLEP 2013 are:

- a) to protect the operational environment of industries operating within the Oberon Timber Complex,
- b) to control development near the Oberon Timber Complex and waste disposal facilities to minimise land use conflicts.

Before granting development consent to development on land to which this clause applies, the consent authority must consider the following:

- a) the impact that any noise, odour or other emissions associated with existing land uses may have on the development,
- b) any proposed measures incorporated into the development that limit the impact of such noise and other emissions associated with the existing land use,
- c) any opportunities to relocate the development outside the land to which this clause applies,
- d) whether the development is likely to adversely affect the operational environment of any existing development on the land to which this clause applies.



**Figure 5-Indicative Location of the Project Relative to the Industrial Buffer Zone**

In this instance, it is noted that the Project is located within the Industrial Buffer area, as illustrated above. However, the Project is part of the Oberon Timber Complex, rather than being a development that may be affected by the ongoing operations of the Oberon Timber Complex.

Despite the above, it is important to note that mitigation measures have been put in place to minimise the impacts of the development on adjoining land uses, such as installation of appropriate noise reducing technology and buildings, air emissions reduction technologies, and the like.

The proposed S4.55 modifications are predominantly to reduce impacts and improve long term operability of the Project.

### **3.4.2 Oberon Development Control Plan**

Clause 11 of SEPP SSD states:

*Development control plans (whether made before or after the commencement of this Policy) do not apply to:*

- a. State significant development, or*
- b. development for which a relevant council is the consent authority under section 89D (2) of the Act.*

As a result, no DCPs are relevant to the Project or proposed S4.55 modification. However, the Oberon Council DCP Part D – Commercial and Industrial Development was considered during assessment of the Project (The Design Partnership, June 2016). The proposed S4.55 Modifications are substantially the same development as the development for which the consent was originally granted.

## **3.5 Environment Protection Licence**

Environment Protection Licence 3035 (EPL 3035) authorises the carrying out of the scheduled activities chemical production and wood or timber milling or processing at the Borg Panels facility in accordance with the requirements of the licence.

The proposed S4.55 modifications are predominantly to reduce impacts and improve long-term operability of the Project. Modification of the site EPL will be sought once approval is granted.

## **4 Proposed S4.55 Modifications**

The proposed modifications explained below throughout Section 4, to the approved particleboard and medium density fibreboard manufacturing facilities are further detailed in the accompanying S4.55 Drawing Package- MOD 4- Improved layout.

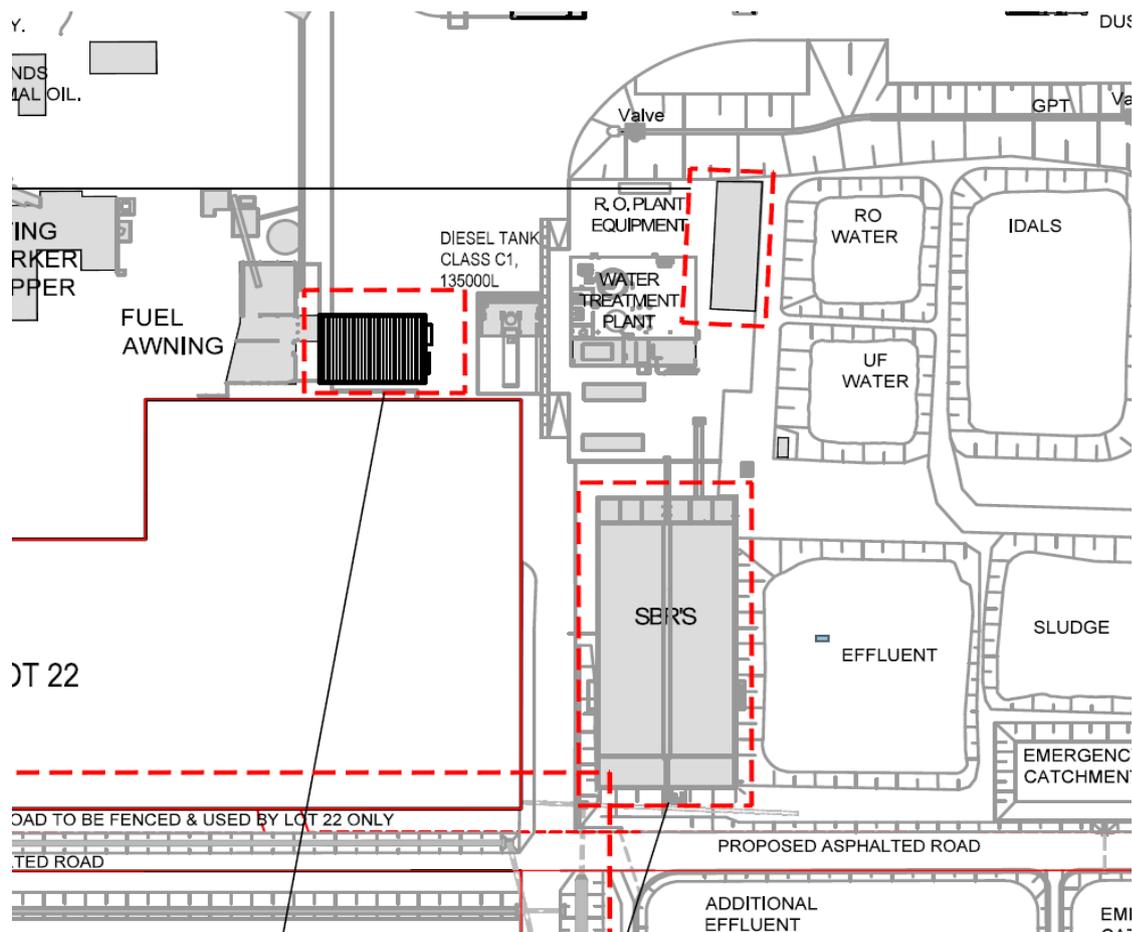
The Borg panels facility operates its own water treatment plant, this processes most liquids generated from production activities at the facility. The plant was installed as part of the expansion to the site in the early 2000s, the plant has been improved and upgraded over the years to ensure operability and capacity is maintained, further enhancements are now required. The improvements to the site water treatment plant include construction of a storage shed, installation of additional Reverse Osmosis filtration plant and enclosure of the site effluent biological treatment tanks.

The storage shed will be constructed using concrete and metal, with Colourbond cladding applied to all exterior surfaces including the roof. The storage shed will be used as an additional storage area for chemicals already purchased for use by the Water Treatment Plant, no additional chemical types or increased quantities are intended to be utilised as part of the proposed modification. The chemicals specifically used by water treatment processes include flocculants, coagulants, anti-microbial agents, defoamers, cleaners and various other surface-active agents. The storage area will include perimeter bunding and a roll over hump will be provided for easy vehicular access and effective spill containment, these controls will be constructed from impervious concrete material. *See details in Figure 6* and attached drawing package sheet - DA 400.

Currently, the site water treatment biological tanks are open and exposed to the environment, they require heating to maintain optimum temperatures for biological activities to occur. There is a large heat loss due to the open environment, particularly during the colder times of the year. The addition of an enclosure to the water treatment tanks will provide shelter from the extreme environment and improve the efficiency of the treatment process by reducing heat loss and evaporation and will assist with capturing fugitive environmental emissions. The biological tanks enclosure will be constructed from structural steel and Colourbond cladding will be applied to all the external surfaces so that the visual appearance of the site is maintained.

Construction of an additional lined effluent storage basin will provide overflow storage for site process water at all times of the year. The overflow effluent dam is required for the site to operate with sufficient control and redundancy to ensure operations are not hindered and the environment is not threatened, during periods of low WTP productivity. The dam will measure approximately 60m long x 30m wide and have a nominal capacity of 8ML.

The changes to water treatment plant will be further supported by the Installation of additional Reverse Osmosis filtered water production capacity for generation of water to be consumed at the site. Additional RO filtration equipment will be installed at the WTP area on the bunded hardstand close to the WTP control room. This RO plant will be able to produce up to 2ML per day, twice that of the existing plant, thus ensuring reliable volumes of water filtration are available even when the weather is cold.



**Figure 6- Water treatment plant area**

Improvements and modernisation of the Medium Density Fibreboard MDL plant is required due to its efficiency, age and availability of the spare parts. Borg produce a large range of panel thicknesses across their MDF producing press lines and the modernisation of the plant is required to ensure efficiency of all the press lines is maintained. All the old press lines at the site have received some modernisation over the last 11 years of Borg ownership, this is necessary for Wood based Panel manufacturing lines all over the world. Changing material thicknesses during manufacture significantly impacts uptime and quality is compromised each time the thickness is varied. The modernisation of the MDF plant will focus on its production methodology and ability to manufacture panels up to 9mm thick, whilst thicker panels can be produced the focus is on efficiently manufacturing the thinner ones.

This modernisation will combine the air emission (EPA pts 18) press vent fans and the historical paper treater (EPA pt. 23) into one common (new EPA pt.) discharge stack, shown in Figure 7. As part of the original SSD approval exhaust air from the paper treaters was redirected to the furnace for destruction of any Formaldehyde, this process requires alteration as it reduces reliability and efficiency of the furnace. This change will be incorporated with the modernisation of the MDF MDL plant press vent's, all the air pollution source exhaust flows have now been combined into a common stack, thus a new EPA licensed discharge point is proposed.

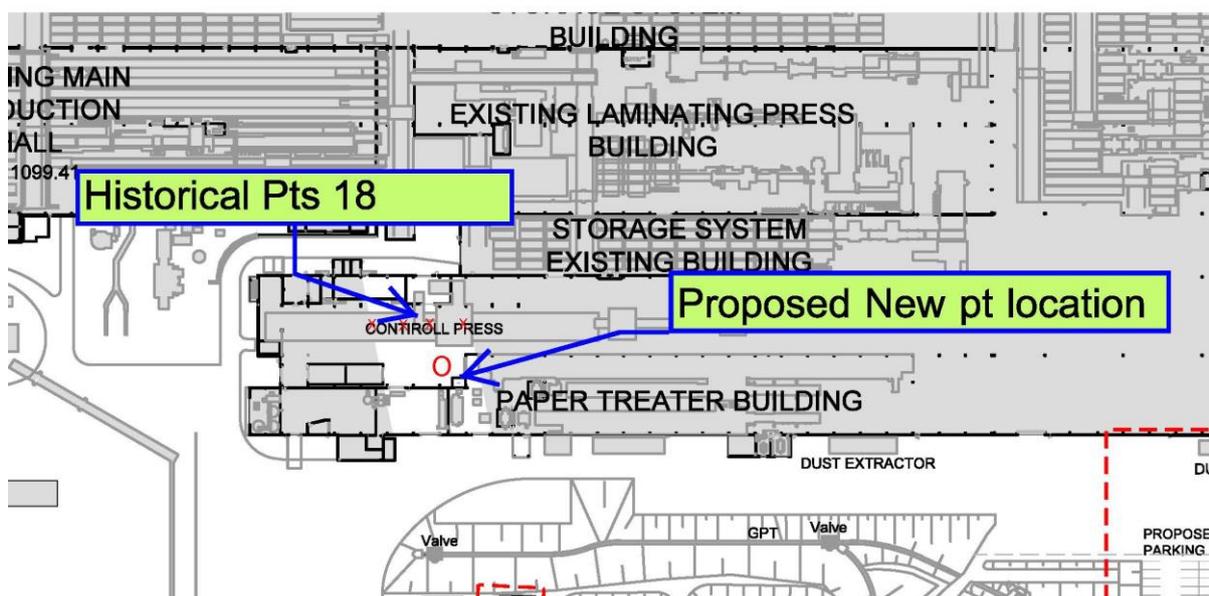
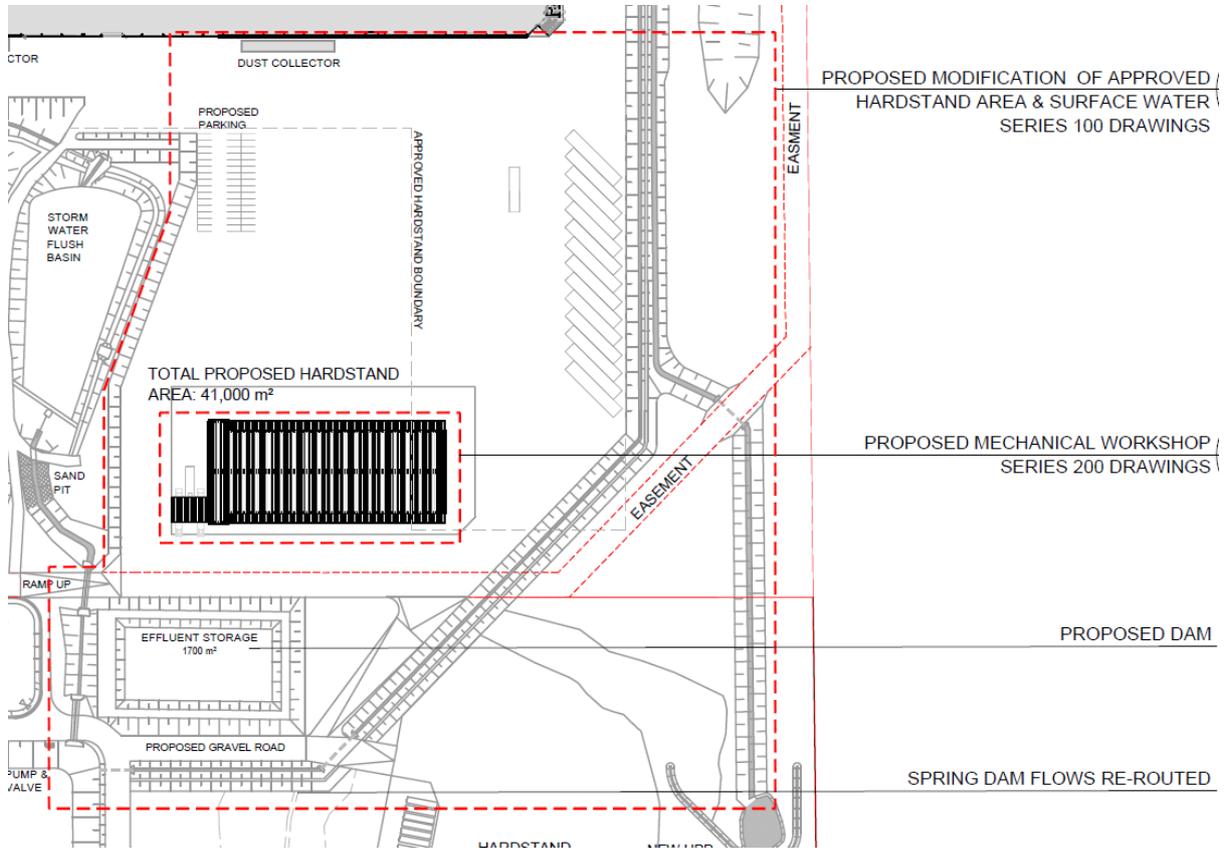


Figure 7- Proposed air emission point changes.

To construct the hardstand for the workshop the spring fed dam, which also provides water for the site to use under a Water access license, will need to be reclaimed. The dam is not naturally occurring and was created during an expansion at the site in the late 1990's, water draw is proposed to be retained and accessed via utilisation granular fill to allow surfacing of water outside the hardstand area or via the installation of groundwater extraction bores. Borg proposes to continue the activity of ground water take for reuse at the project site.

A larger mechanical repair workshop is required for our growing fleet of vehicles, *shown in Figure 8* and attached drawing package sheet- DA 100. The current workshop is located at the Western side of the site close to Gate 4 where large numbers of trucks and cars enter and move around the site, this area is quite congested with traffic movements and parked vehicles. The new workshop will contain 7 bays and will include an automated truck washing machine, refuelling area and parking for large vehicles. The mechanics workshop relocation and incorporated facilities will provide a safer working environment for the employees and reduce congestion within the site as the workshop area will be removed from the area of main general activities related with the production of reconstituted wood products. The automated truck washing system maintains the safety and visual appearance of the fleet but also reduces the amount fugitive materials that can potentially be released into the environment when the trucks are driving on the roads by providing an easy and reliable method of effective truck washing.

The creation of the new concrete hardstand and creation of an additional lined effluent dam will require some minor changes of the site swales, these are considered relatively minor and will not change construction or operational activities significantly.



**Figure 8- proposed hardstand, effluent dam and mechanic's workshop**

Changes to the roads within the site as shown in *Figure 9*, and attached drawing package sheet- DA 300, below will provide better access to the workshop without interfering with general site traffic movements. This change does not permit the increase of vehicles entering the site but rather provides additional space for vehicles on-site to manoeuvre within.

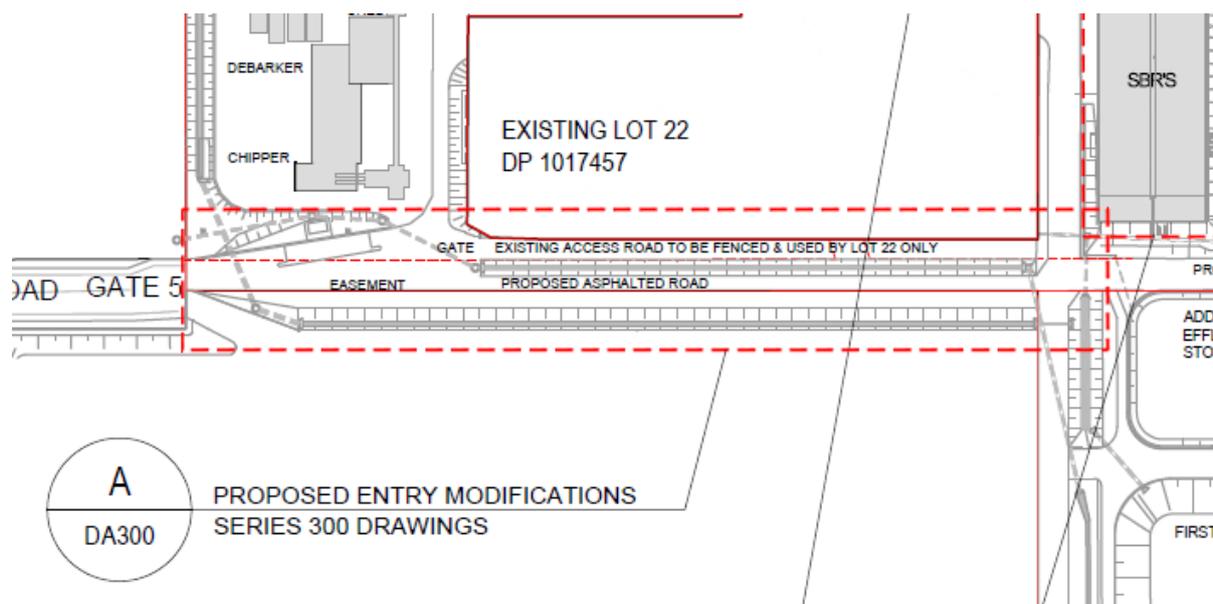


Figure 9- Proposed new internal access road.

## 5 Environmental Impact Assessment

The proposed S4.55 modification includes:

- Increase in the size of the hardstand at the North Eastern corner of the site to facilitate the relocation & expansion of the existing mechanic's workshop, addition of a refuelling area and including an automated truck washing bay.
- Reclamation of the remaining spring fed dam area to facilitate the increase in hardstand with continued groundwater extraction from the spring fed dam aquifer
- Improvement and modernisation of the MDL MDF plant which includes changes to the site air emission points including EPA pt. 18 and changes to paper treater exhaust, historical EPA pt. 23.
- Improvements and additions to the site water treatment plant including an enclosure to the site water treatment biological system tanks, addition of RO production capacity, construction of a new lined effluent dam and construction of new bunded chemical storage area for WTP use.
- Construction of a new access road with-in the site to better facilitate traffic flow.

### 5.1 Traffic and Transport

To inform the assessment of the original Project as unmodified, a Traffic Impact Assessment Report (SMEC, 06 May 2016) and subsequent Response to Request for Further Information (SMEC, 21 Sep 2016) was prepared to review the impacts of the Project, both during construction and for the ongoing operation. This assessment looked at both truck and light vehicle movements at the current facility, the anticipated levels of traffic generated during

construction, and the estimated heavy vehicle movements post-construction, during the operation of the facility. The findings concluded that the existing road network can absorb the probable increase in traffic without any significant compromise.

This proposed S4.55 modification will result in no changes to the traffic movement of the project outside the boundary of the development. The proposed modifications are not expected to create any change to operational traffic generation or timing of traffic movements as there is no change to the approved output capacity of the site. No new site access points are proposed, and the site will continue to utilise the existing access points.

Construction traffic & noise would be managed as detailed in approved site Construction Environmental Management Plan. Operational traffic plans will be update as required.

## 5.2 Air Quality

To inform the assessment of the original Project as unmodified, Todoroski Air Sciences (16 February 2017) prepared an Air Quality Impact Assessment Report for the Project. The report provided a comparative assessment of the potential air quality impacts associated with the existing operations and proposed expansion of the facility.

The assessment concluded in-stack emission concentration limits are below the applicable POEO Clean Air regulation limits and thus the ground level impacts would remain similar to those predicted as originally approved for the Project. The results indicate that the Project is unlikely to lead to any exceedance of any criteria at any residential receptor at any time.

The proposed S4.55 1A modification includes modernisation of the MDL Medium Density fibreboard press and proposes some changes to the location of the site air discharge points, these have been assessed by Todoroski Air sciences and the report has been included in *Appendix A- Borg Paper treater AQ\_211006* . A summary is provided below:

Air emission modifications are being incorporated with changes to modernisation of the MDL MDF press which brings about changes to the press vent fans identified as EPA Point 18a to 18e and installation of a wetted press extraction system. The formaldehyde emissions from these sources were historically ventilated to atmosphere via a series of short roof stacks (~16m, which is roof height). The press vents will be removed from operation and it is proposed the air emissions from the press are to be captured via specially designed suction points around the press itself. The captured air is wetted, conveyed to and treated via a new wet press extraction system scrubber at the facility with the exhaust emissions directed to the new combined stack (which includes EPA pt. 23 ) for discharge to atmosphere at 40m height, a summary of the air emission inventory is included in Figure 10 below.

Air emissions from the Paper Treater, formerly known as EPA Point 23, were made redundant in the 2017 facility expansion as they were diverted into the Conti-2 heat plant furnace, where the formaldehyde emissions would be destroyed. The diversion of the air emissions from the Paper Treater is having an effect on the reliable operation of the furnace and is now needed to be redirected to atmosphere via the new combined licensed discharge point.

To further improve dispersion and reduce impacts in the surrounding environment, it is also proposed to increase the stack height of EPA 27 and EPA 31 from the current height of 20m

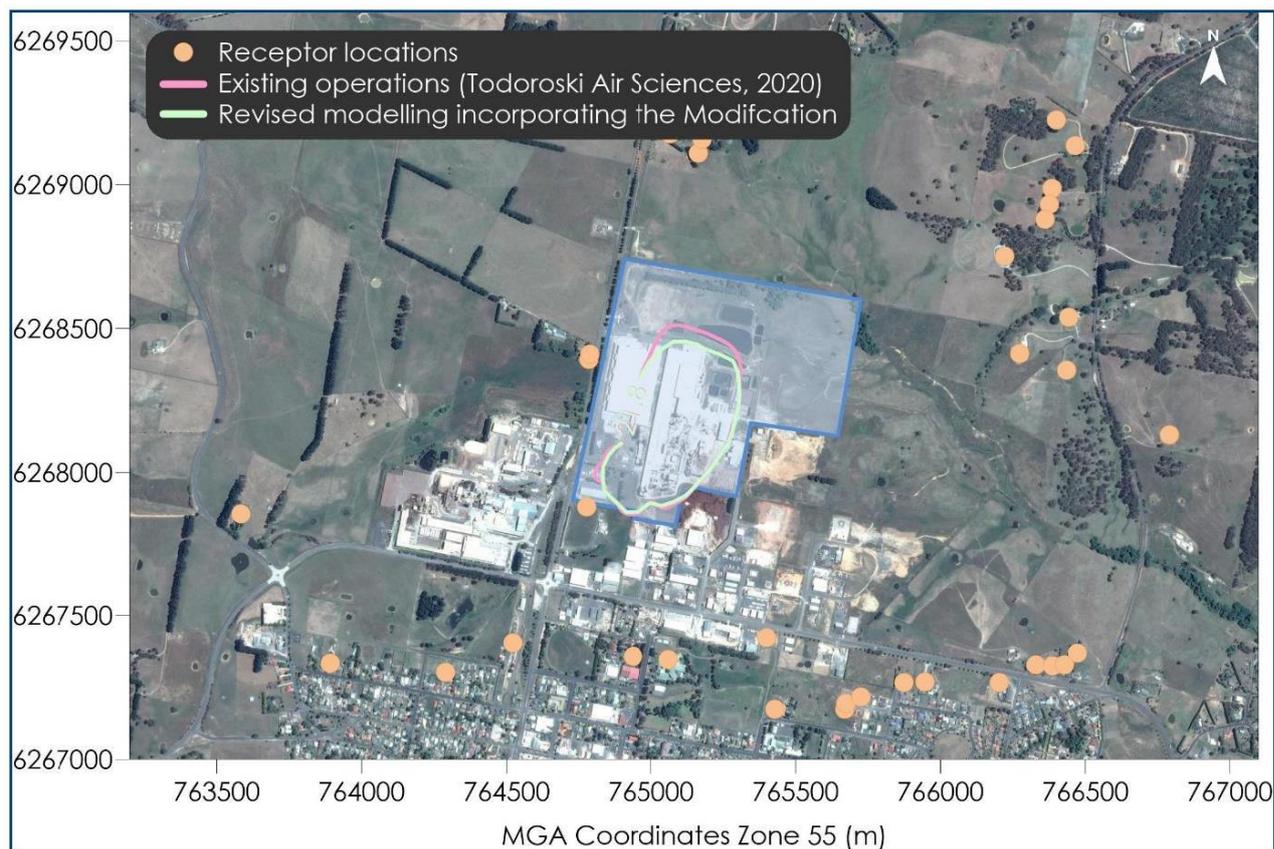
to 30m. This increase would reduce formaldehyde and other air pollutant impacts in the surrounding environment.

This new scrubber will be installed using best available technology and will be similar to those installed at stacks EPA 27 and EPA 31 which have shown efficiency in maintaining low formaldehyde emission levels.

Source ID	Description	Stack height (m)	Discharge Temp. (°C)	Stack diameter (m)	Exit velocity (m/s)	TSP (g/s)	PM10 (g/s)	Formaldehyde (g/s)	NO <sub>x</sub> (g/s)
<b>Existing sources</b>									
EPA18a	Existing Press Vents	16	26	1.24	9.1	0.064	0.064	0.041	-
EPA18b	Existing Press Vents	16	26	1.24	5.5	0.037	0.037	0.045	-
EPA18c	Existing Press Vents	16	26	1.24	8.4	0.057	0.057	0.058	-
EPA18d	Existing Press Vents	16	25	1.24	7.9	0.030	0.030	0.020	-
EPA18e	Existing Press Vents	17	25	1.24	8.4	0.045	0.045	0.013	-
EPA23	Paper Treater – combusted in furnace	-	-	-	-	-	-	-	-
<b>Modification</b>									
EPA23	Paper Treater + Press vents via scrubber (EPA18a to 18e)	40	63	2	16.9	1.13	1.02	0.17	0.06

**Figure 10- Updated Air emission Inventory to inform the AQIA.**

The comparison modelling undertaken shows that the modification would marginally reduce the onsite formaldehyde impacts and that no significant change is predicted for formaldehyde levels at any off-site receptors, this is demonstrated by overlaying the contour results from the model predictions, as can be seen in the image *Figure 11* below.

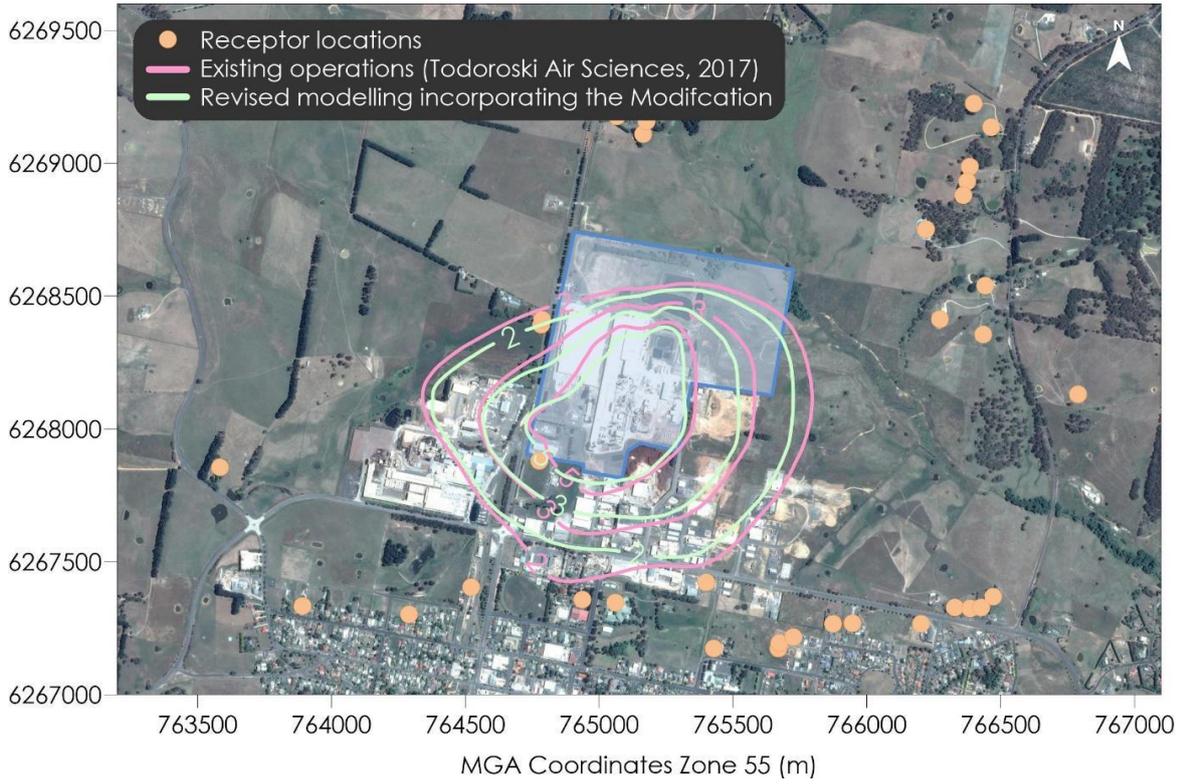


**Figure 11- Formaldehyde Air quality impacts**

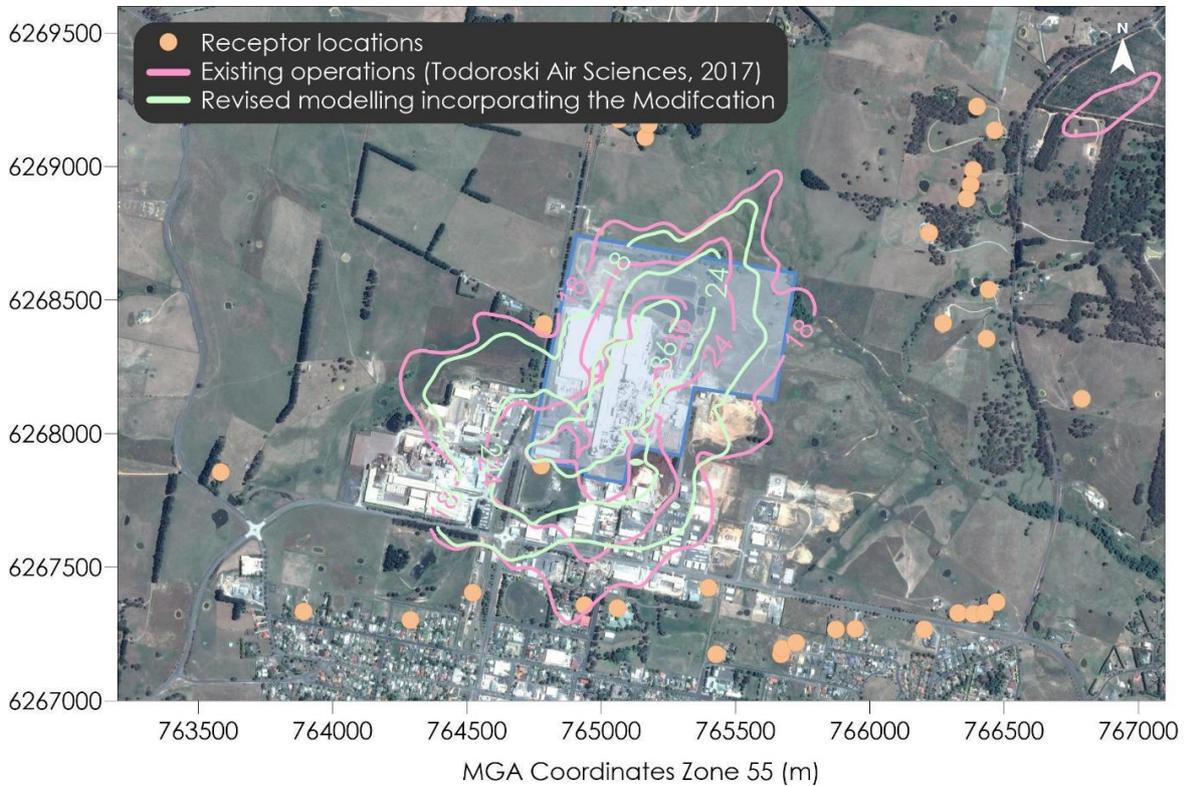
A comparison of PM<sub>10</sub>, TSP and NO<sub>2</sub> concentrations associated with the modification relative to the original approved air quality impacts does not indicate any significant change at the facility.

The comparison indicates that the Modification would see a negligible change in impact of 24-hour average PM<sub>10</sub>, annual average PM<sub>10</sub> and TSP, maximum 1-hour average NO<sub>2</sub> and annual average NO<sub>2</sub> relative to the existing approved impacts for the site, furthermore the predicted impacts are well below the relevant impact assessment criteria of:

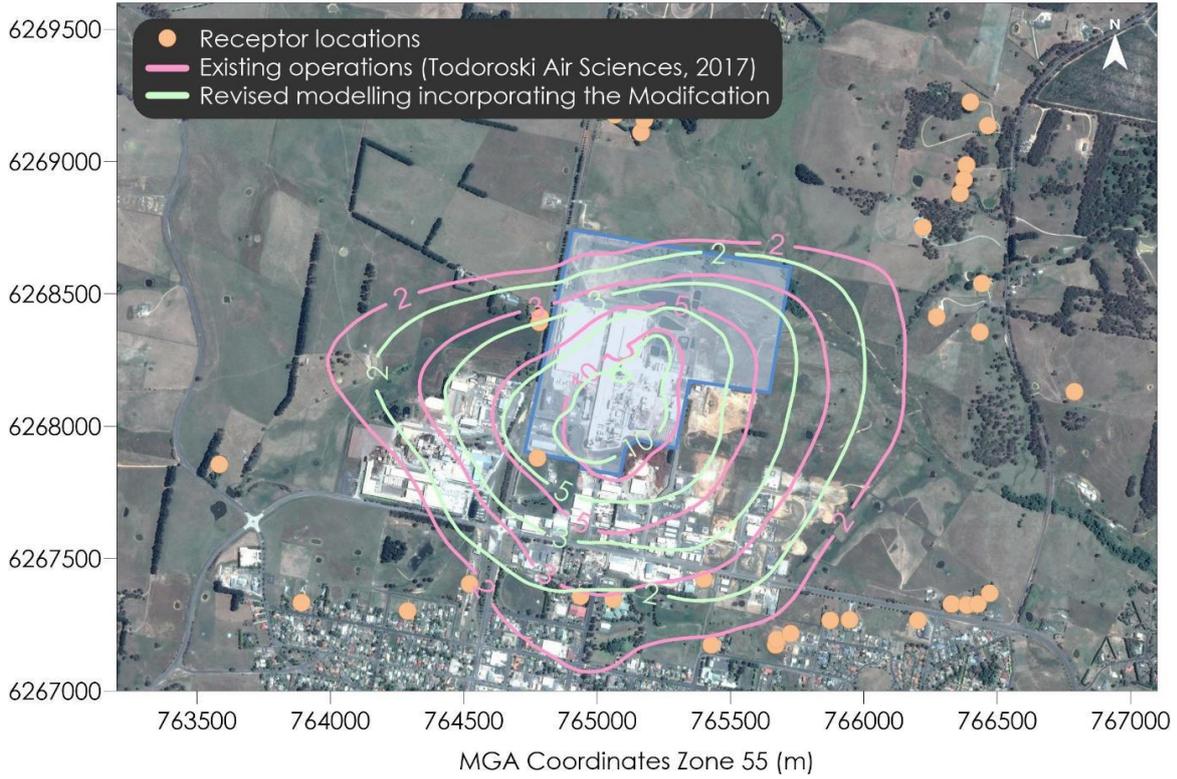
- 50µg/m<sup>3</sup> for 24-hour average PM<sub>10</sub>;
- 25µg/m<sup>3</sup> for annual average PM<sub>10</sub>;
- 90µg/m<sup>3</sup> for annual average TSP;
- 246µg/m<sup>3</sup> for 1-hour average NO<sub>2</sub>; and,
- 62µg/m<sup>3</sup> for annual average NO<sub>2</sub>



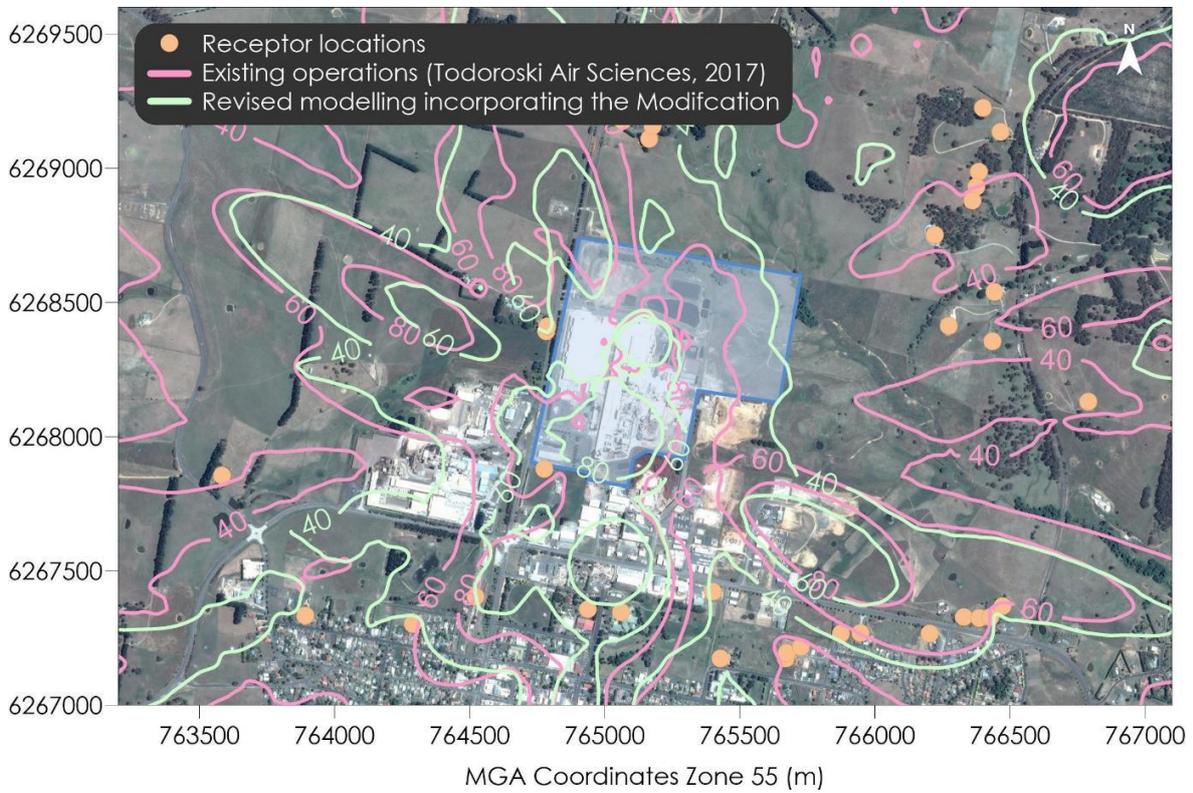
**Figure 12 Comparison of annual average PM10 concentrations for the Modification ( $\mu\text{g}/\text{m}^3$ )**



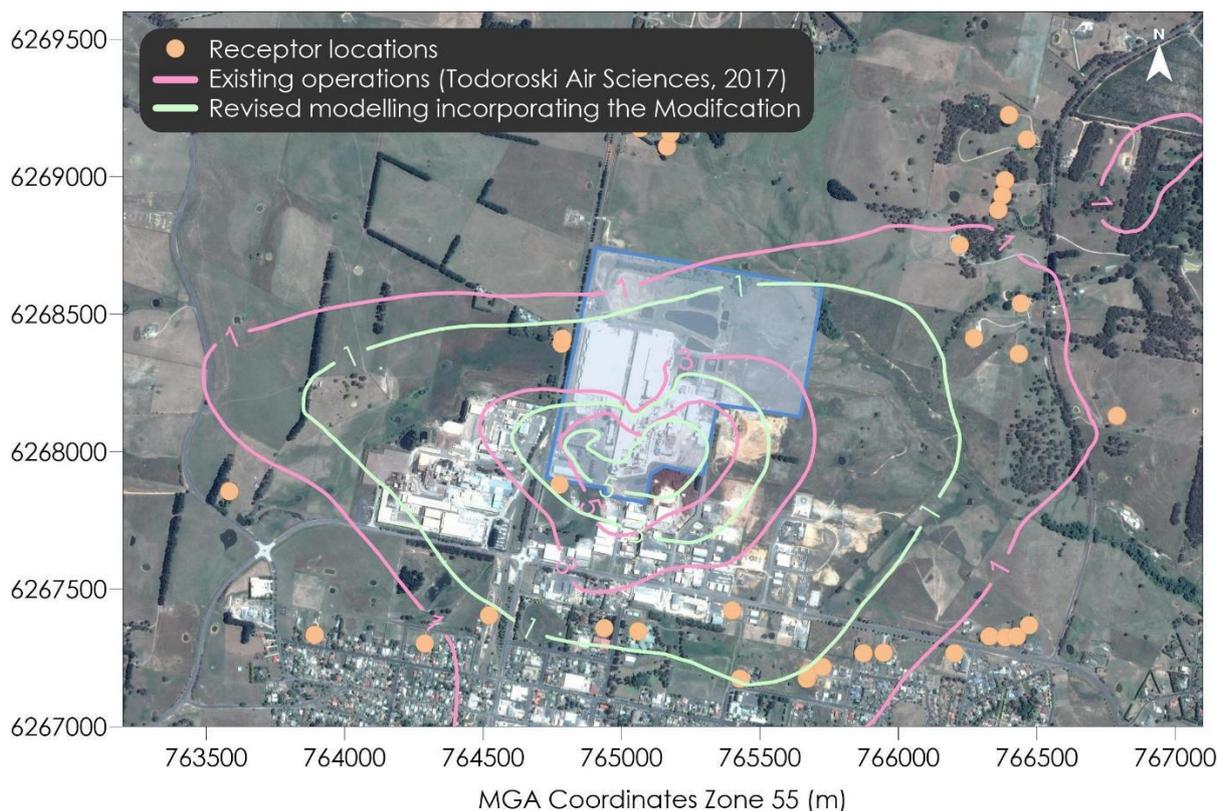
**Figure 13 Comparison of maximum 24-hour average PM10 concentrations for the Modification ( $\mu\text{g}/\text{m}^3$ )**



**Figure 14 Comparison of annual average TSP concentrations for the Modification ( $\mu\text{g}/\text{m}^3$ )**



**Figure 15 Comparison of maximum 1-hour average NO<sub>2</sub> concentrations for the Modification ( $\mu\text{g}/\text{m}^3$ )**



**Figure 16 Comparison of annual average NO<sub>2</sub> concentrations for the Modification (µg/m<sup>3</sup>)**

### 5.3 Hazard and Risk

To inform the assessment of the original Project as unmodified, a Preliminary Hazard Analysis (PHA) was undertaken by Sherpa Consulting to assess the potential risk of the Project in accordance with the *Applying SEPP 33 Hazardous and Offensive Industry Development Application Guidelines* (DP&E, 1994). This assessment concluded that the site operations do not constitute a hazardous or offensive industry.

Pre-construction and operational hazard studies have also been prepared and approved by NSW DP&E for the Project, including:

- **Fire Safety Study** covering the relevant aspects of the Department's *Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines'* and the NSW Government's *'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'*. During preparation of the study consultation was undertaken with FRNSW, and their requirements have been addressed in the final assessment.
- **Hazard and Operability Study (HAZOP)** for the Project, chaired by a qualified person, independent of the Development. This study was consistent with the Department's *Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'*.

- **Final Hazard Analysis** of the Project, consistent with the Department's *Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'*.
- **Construction Safety Study** for the Development, consistent with the Department's *Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety'*. This study identified and addressed the potential hazards arising from the interactions with the existing facility during construction.

Applicable components of the Hazard and Risk studies as undertaken for the original development and its modifications will be updated as required.

## 5.4 Noise and Vibration

Global acoustics was commissioned to update the site noise model, to use as information for the proposed development modification which forms part of this application. Sound power levels and locations were provided for all new equipment and plant proposed for the workshop. All other proposed changes to site are contained within the buildings and the equipment proposed will be installed in lieu of other equipment having been removed or operating at a reduced capacity.

The relocation of workshop will be the largest contributor to the potential noise generating activities emanating from the site, modelling has been undertaken utilising conservative operational scenarios. Modelling details are:

- Door openings will be located on the east and west sides of the building, which will be used for vehicle access to the maintenance bays. Conservatively, these openings were modelled in the fully open position to consider the worst-case scenario, although the openings will have roller shutter doors that will more than likely be closed during evening operations.
- A truck wash is located on the South end of the building, with openings on the east and west sides for vehicle access to the wash bay.
- Truck movements along the north, east and south of the maintenance workshop area have been modelled at a conservative rate of 6 rigid and 6 articulated vehicles per hour, for a total of 12 vehicle movements per hour. In reality the actual vehicle movements are expected to be considerably less.

The truck workshop movements were developed based on existing site activity and extrapolated to allow for a modest increase in capacity and then a factor of conservatism was applied. The sound power levels for road trucks utilised in the modelling (figure below) are a composite which includes various modes of operation including low, moderate, and high idle to account for varying operation of the vehicle. The workshop sound power is a composite with various equipment types operating for typical durations within the workshop. Sources include 2 forklifts, 2 compressors, 5 power tools, 2 heavy vehicles idling and an arc welder.

ID	Description	Linear	A-weighted
MOD4-1	Road trucks (rigid)	106	100
MOD4-2	Road trucks (articulated)	115	106
MOD4-3	Workshop (interior)	117	112
MOD4-4	Wash bay (interior)	96	94

**Figure 17- Sound power levels for plant added to updated site noise model**

As demonstrated below in *Figure 18*, compliance with project approved noise criteria is predicted under all scenarios. For the night period, all predictions remain the same as for MOD 3, for the day and evening periods the reported prediction, in *Figure 18*, for receptors R03 and R05 are 1dB higher than reported for MOD 3. However, in both cases this is due to rounding with actual predicted increase being a very insignificant 0.1dB. Overall, the proposed modification is not predicted to make any meaningful difference to site noise emission and is further explained in the *Global acoustics report 21179\_L02* attached as *Appendix B*.

Receptor ID	Location	Criteria	Prediction		
		D/E/N	Day	Evening	Night
R01	32 O'Connell Road	55/50/45	39	39	37
R02	6 Herborn Street	55/50/45	43	43	41
R03	Oberon High School	55/50/45	45	45	43
R04	10 Tasman Street	55/50/45	38	38	40
R05	127 Hazelgrove Road	55/50/45	36	36	39
R06	26 Cunyngame Street	55/50/45	44	44	42
R07	131 Hazelgrove Road	55/50/45	37	37	40
R08	2 Herborn Street	55/50/45	43	43	42
R09	Albion Street	55/50/45	47	47	45
R10	Caravan Park	55/50/45	45	45	44
R11	Christian Life Centre	55/50/45	41	41	42
R12	Clover Lane	55/50/45	37	37	41

**Figure 18- Predicted noise impacts**

Global Acoustics has been conducting attended compliance monitoring around the Borg Oberon site since May 2018. During that time, 103 attended measurements have been made, with just one exceedance being recorded, which was a minor 1 dB exceedance at R10 (Oberon Caravan Park) during the Quarter 1 2020 survey. Strong temperature inversion conditions were present during monitoring, which would have been primarily responsible for higher than usual noise levels being measured. A subsequent remeasure demonstrated the site was in compliance. This compliance history indicates the site generally operates within approved noise limits, with the only recorded exceedance is the last three years being influenced by strongly enhancing weather conditions.

Construction noise will be managed in accordance with the approved Construction environment management plan (CEMP).

## 5.5 Soil

As identified in the EIS (The Design Partnership, June 2016) prepared to inform the assessment of the original Project as unmodified, the facility is located on existing industrial zoned land and has been used for industrial land uses for a significant period of time.

Prior to construction of the proposed modifications, the Erosion and Sediment Control Plans for the Project will be updated to incorporate control measures for the modifications, and those measures are to be implemented.

On completion of construction, disturbed areas will be stabilised with vegetation or hard surfaces, the surface water management system will be stabilised/vegetated in accordance with the design drawings.

During operation of the Project, all surfaces are to remain stabilised. Where construction & maintenance works require soil disturbance, the area is to be revegetated or reinstated as soon as practicable following completion of the works.

All fill materials required to be brought to site will satisfy the requirements of the EPA and the required criteria as specified in the National Environment Protection Council.

## 5.6 Water

Assessment of the Project as unmodified, included a Water Cycle Impact Assessment that was prepared by The Sustainability Workshop (12 May 2016) to review the impacts on both surface and ground water. The existing site stormwater system accepts stormwater from other parts of the Oberon Timber Complex and processes this water before discharge. This ensures that contaminants are significantly reduced.

As part of the Project approval and construction, an extensive upgrade to the existing stormwater management system was approved, which included additional retention and catchment basins. This design ensured that stormwater and any liquids from a potential event can be adequately retained on site prior to treatment, reuse or disposal. This significantly reduces the potential impacts on the surrounding environment in an emergency event.

This proposed modification further underpins this philosophy by creating further storage and more redundancy ultimately creating more reliability of processes and reduction of the site's environmental impacts. The improvements to the site water treatment plant include construction of a storage shed, installation of additional Reverse Osmosis filtration plant, construction of an additional lined effluent dam and enclosure of the site effluent biological treatment tanks. These modifications are required to ensure efficiency and effectiveness of the water treatment plant processes during the colder months of the year when effluent processing throughput is reduced.

The storage shed will be used for chemicals currently purchased for use at the water treatment plant, predominantly to ensure adequate separation and protection from the

environment. The storage shed will incorporate a bund for retention of any materials, 110% capacity will be maintained for volumes of liquids stored. Furthermore, incompatible material will not be stored together as per required guidelines including *SWA-Managing Risk of storing chemicals in the workplace*.

An additional effluent storage dam is proposed as part of the proposed modification, this will primarily serve as an overflow storage during normal operation and in particular during extended periods of wet and cold weather. The dam will be constructed in close proximity to the eastern side of the water treatment plant and will be lined with a chemically resistant membrane to ensure there is no migration of pollutants, thus eliminating most of the potential environmental impacts.

Installation of additional Reverse Osmosis filtration plant will allow greater capacity to create clean water for site use thus creating less reliance on the public council water supply system. The RO process requires a higher than ambient temperature which is difficult to maintain when the temperatures in Oberon are low. This RO plant will be installed in the existing water treatment plant bunded area footprint only requiring a small building to allow installation of the membranes and pumps.

The above modifications are further supported by enclosing (insulating) the biological reaction tanks so they are less likely to be affected by the severely cold climate, the enclosure will also reduce energy consumption of the WTP processes.

To facilitate the relocation of the mechanics workshop the total spring dam area will be reclaimed. Reclamation of part of the spring fed dam was successfully completed as part of Modification 1, surfacing groundwater inflows were maintained. The volume of water licensed for access and utilised by Borg is almost the same as the generation capacity of the dam thus the complete reclamation is deemed feasible. Borg requires all water, up to our license limit, that is available from the spring dam and can confirm that the requirement for the water draw will be ongoing.

Ground water flows will be maintained by proposing redundant methods for groundwater harvesting. Initially this will include utilisation of granular fill for the spring dam reclamation and pits and pipes shall be installed to provide a flow path for any surfacing water. A Redundant method for water take activities can be enacted via installation of ground water extraction bores to maintain water take at the site and thus control the height of the aquifer.

The proposed approach for the spring dam reclamation is further supported by the fact that the Borg Oberon site also includes one other bore for water take, this bore is able to yield well in excess (about 5 times more) of the water take activities proposed as part of reclamation indicating suitable bores are able to be constructed at the site. This indicates a relatively positive position in ensuring groundwater flows via either method is retained. Finally, if the bore is not able provide flows an additional bore can be installed and water drawn through both to achieve volumes required.

The Spring Fed Dam Reclamation Management plan will be updated prior to civil activities being undertaken. Recovery of the Spring dam area is supported by letter report provide by *Edge geotechnical-Comments on Full Reclamation of Spring Fed Dam*.

The refuelling area will be enclosed with a roof to ensure limited rainwater is captured within its bunded area, any runoff created from within the bunded area will be treated appropriately and in accordance with the relevant legislation, e.g., *NSW EPA fuel handling and dispensing areas*.

To facilitate the construction of the mechanics workshop and the new effluent basin at the site stormwater channels will require to be re-routed. Swale construction and stormwater system operation and management will remain consistent with previous design commitments and mitigation measures

## **5.7 Waste**

Any additional construction waste generated by the proposed modifications would be managed in accordance with the approved Construction Environmental Management Plan (Borg Construction, 31 May 2017) for the Project.

The proposed modifications are predominantly to building and existing processes, no unfamiliar activities will be undertaken at site. Therefore, it is not expected that operation of the modified development will create any change to waste generated, regardless the waste management plan will be updated as required.

## **5.8 Greenhouse Gas Emissions**

To inform the assessment of the original Project as unmodified, Northmore Gordon (29 April 2016) undertook a Greenhouse Gas Assessment for the Project. The assessment considered relevant national and state policy and guidelines for GHG emissions and assessment. In addition, the GHG assessment followed the accounting standards for the GHG Protocol. Emissions were reported in terms of standardised carbon dioxide equivalent (CO<sub>2</sub>-e) values, which account for several GHGs.

Whilst the proposed modification includes changes to the equipment located within the project boundary these are very minor in the context of the whole site and have largely been identified as process efficiency upgrades which in turn will improve operation of the site thus inadvertently reduce emissions.

## **5.9 Visual Impacts**

To inform the assessment of the original Project as unmodified, a Visual Impact Assessment (The Design Partnership, 19 May 2016) was prepared. This report found there are significant existing visual impacts on the area from the operations and infrastructure of the Oberon Timber Complex, including the Borg Panels site as well as other facilities in the Complex not associated with the Project.

The Project is located within a highly industrialised context. The wider Oberon Timber Complex has been an integral part of Oberon for many years. As such, the existing infrastructure has been a visible part of the Oberon skyline for many years. All the recent modifications, including this proposed S4.55 application are consistent with the existing development, large industrial buildings and chimneys which are the key visual features of the Borg site and the Oberon Timber Complex.

The S4.55 modification does not fundamentally change the building or equipment layout therefore considering the nature of the existing development no changes to the visual impacts as approved are anticipated.

## 5.10 Social and Economic

Assessment of social and economic impacts during preparation of the EIS (The Design Partnership, June 2016) prepared for the original Project as unmodified, found the development to have positive impacts on local employment levels and resultant positive social impacts.

The S4.55 (1A) modifications proposed will ensure long term efficient operation of the site therefore creating an opportunity for approximately 15 long term employment opportunities. Furthermore, it is likely that an additional 20-30 construction jobs will be realised during the construction period.

## 5.11 Ecology

A Biodiversity Assessment (Peak Land Management, May 2016) was prepared to inform the assessment of the original Project as unmodified. This report concluded that the Project site is severely disturbed, with most native vegetation under and around the existing facility being cleared, and exotics or planted species occurring around the northern, western and parts of the eastern sides of the site.

Although Apple Box – Yellow Box Dry Grassy Woodland of the SE Highlands Bioregion is recorded on the eastern parts of the site, the proposed S4.55 modifications are being conducted on historically impacted areas of the site and thus do not impact the area of this Endangered Ecological Community (EEC) and thus have been assessed to have little or no ecological impact.

## 5.12 Indigenous Heritage

To inform the assessment of the original Project as unmodified, an assessment of indigenous heritage matters was undertaken as part of the EIS (The Design Partnership, June 2016).

Four artefacts have previously been recorded on the site in a 1986 archaeological survey carried out by Brayshaw and Associates prior to the construction of the Borg Panels MDF manufacturing plant. The Brayshaw and Associates report concluded that:

*In view of the disturbance sustained to the area, the apparent sparseness of the artefacts, and the clay deposit which would make excavation and accurate provenance extremely difficult, excavation of the area is not appropriate.*

This EIS concluded that given the scattered nature of artefacts identified during the previous study carried out, the soil type and general topography of the site and the conclusions of that report, no further studies are considered to be necessary.

However, if any indigenous artefacts are uncovered during earthworks, then work will be stopped, and a suitable representative from the indigenous community contacted. Works

would only recommence when an appropriate and approved management strategy has been agreed to by all of the relevant stakeholders.

It is recommended that the Aboriginal and European Heritage Management and Mitigation Measures outlined in the approved Construction Environmental Management Plan (Borg Construction, 31 May 2017) for the Project be adopted for the proposed modifications. The CEMP includes an unexpected finds protocol for heritage items.

### **5.13 European Heritage**

To inform the assessment of the original Project as unmodified, an assessment of European heritage matters was undertaken as part of the EIS (The Design Partnership, June 2016). No heritage items were located within close proximity to the Project, the closest being the Oberon Station Precinct, which is approximately 500m from the site.

The EIS concluded, given the distance from the site of the items of European heritage, no mitigation measures are considered to be necessary. Existing Oberon Timber Complex activities (not part of the Borg Panels operations) are located on a lot adjoining these items, and although the Project brings the Borg activities closer to the heritage item there is still significant physical separation.

It is recommended that the Aboriginal and European Heritage Management and Mitigation Measures outlined in the approved Construction Environmental Management Plan (Borg Construction, 31 May 2017) for the Project be adopted for the proposed modifications. The CEMP includes an unexpected finds protocol for heritage items.

### **5.14 Cumulative Impacts**

The proposed S4.55 modifications will have minimal impact on the immediate area and surrounding environment when compared to the approved Project as unmodified. Primarily due to the fact that the changes are minor and are well understood and controlled.

With the mitigation and management measures proposed in this SEE, it is considered that the potential impacts of the proposed S4.55 modification will have minimal environmental impact.

## **6 Conclusion**

The assessment of potential environmental impacts of the proposed S4.55 modification concludes the proposed modifications are ancillary to the approved development.

The additions, improvements and modernisations do not change the project capacity or potential of pollution generation of the plant, but rather makes the manufacture more efficient. Furthermore, the modified development remains substantially the same as the development for which the consent was originally granted.

Based on this information we request the Department assesses this application as a Section 4.55 (1A) Application, as defined in the *Environmental Planning and Assessment Act 1979*.

## Appendices

## Appendix A – Todoroski Air Quality Impact Assessment

## Appendix B – Global Acoustics S4.55 (1A) Modifications Assessment

## Appendix C – Edge Geotechnical Comments of Full reclamation of the Spring Fed Dam