

Annual Review 2023/24

Borg Manufacturing Oberon

124 Lowes Mount Road, Oberon NSW

Borg Manufacturing

15 August 2024

Revision History



Rev No.	Revision Date	Author / Position	Details	Authorised	
				Name / Position	Signature
1	15/08/2024	Andrew Brady Environmental Manager	For submission to DPE	Victor Bendevski	

Table of Contents

1	Introduction	4
1.1	Scope	4
1.2	Background	5
1.3	Consent	6
1.4	Annual Review Requirements	8
1.5	Environment Protection Licence	9
1.6	Water Licences	9
1.7	Trade Waste Licence	10
1.8	Environmental Management Plans	10
1.9	Contacts	10
1.10	Actions Required from Previous Annual Review	10
2	Operations during the Reporting Period	11
2.1	Production	11
2.2	Facility Improvements	12
2.3	Site Activities	12
2.4	Wood Recycling Program	13
3	Waste Management	15
3.1	Solid Waste	15
3.2	Trade Waste	16
4	Environmental Monitoring and Performance	16
4.1	Environmental Management System	16
4.2	Meteorological Data	16
4.3	Air Quality	19
4.4	Surface Water	27
4.4.1	EPL 3035 Identification Point 1	31
4.4.2	EPL 3035 Identification Point 28	31
4.5	Groundwater	31
4.6	Noise	34
5	Community Relations	39
5.1	Environmental Complaints	39
5.2	Community Liaison	40
6	Independent Audit	41
7	Environmental Incidents & Non-compliances	41
7.1	Incidents	
7.2	Non-conformances	42
8	Activities Proposed for the next Annual Review Period	43
	APPENDICIES	44
	Appendix A – Depositional Dust Monitoring Data	46
	Appendix B – Surface Water Monitoring Data	49
	Appendix C – Community Complaints	52

Figure 1 Regional context	5
Figure 2 SSD 7016 Approved Development Area	14
Figure 3 Recorded Rainfall (mm) at Borg Meteorological Station 2023/24	17
Figure 4 Daily Summary Average Wind Rose 2023/24	18
Figure 5 Depositional Dust Gauge Locations	20
Figure 6 Surface water management system - SSD 7016	28
Figure 7 Groundwater Monitoring Locations	32
Figure 8 Borg noise monitoring locations	36

Annual Review Title Block

Name of operation	Borg Manufacturing
Name of operator	Borg Manufacturing
Development consent / project approval #	SSD 7016
Name of holder of development consent / project approval	Borg Construction
Mining lease #	N/A
Name of holder of mining lease	N/A
Water Access Licence #	80WA715797
Name of holder of water licence	Borg Panels Pty Ltd.
MOP/RMP start date	N/A
MOP/RMP end date	N/A
<p><i>I, Victor Bendevski, certify that this audit report is a true and accurate record of the compliance status of Borg Manufacturing Oberon for the period 1st May 2022 to 30th April 2023 and that I am authorised to make this statement on behalf of Borg Panels Pty Ltd</i></p> <p>Note.</p> <p>a) <i>The Annual Review is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment, \$22,000, or both.)</i></p>	
Name of authorised reporting officer	Victor Bendevski
Title of authorised reporting officer	Environment and Regulatory Compliance
Signature of authorised reporting officer	
Date	9/08/2024

1 Introduction

1.1 Scope

This Annual Review has been prepared for the Borg Manufacturing Oberon site (referred to herein as the ‘**Development**’) and covers the twelve-month reporting period from 1 May 2023 to 30 April 2024. This Annual Review has been prepared to satisfy condition C11 of Development Consent SSD 7016 issued by the Minister for Planning on 29 May 2017.

The Development is located at 124 Lowes Mount Road, Oberon and consists of three medium density fibreboard (MDF) plants, a particleboard manufacturing plant and a mouldings manufacturing plant.

This Annual Review is submitted to NSW Department of Planning and Environment (DPE), NSW Environment Protection Authority (EPA) and Oberon Council to ensure all interested parties are kept informed of the environmental performance of the Development. The Annual Review is also made available on the Borg Oberon website:

[BORG - Oberon NSW \(borgs.com.au\)](http://borgs.com.au)

Borg Panels Pty Ltd (‘**Borg**’) generally maintained compliance with necessary approvals and licences with the exception of EPL 3035 condition L2.5 and O2.1 as listed in Table 1. These non-compliance items are discussed in Section 4.4 Surface Water and Section 7.2 Non-Conformances respectively.

Table 1 Compliance

Relevant approval	Condition	Condition description (summary)	Compliance status	Comment	Where addressed in Annual Review
SSD 7016	C11	Annual review	Compliant		1.4 Annual Review Requirements
WAL28951	N/A	Aquifer extraction	Compliant		1.6 Water Licenses
EPL 3035	Section 3 L2.4	Air Quality	Non-compliant	Exceedances of EPL 3035 discharge to air limits	4.3 Air Monitoring
EPL 3035	Section 3 L2.5	Water Quality	Compliant		4.4 Surface Water
EPL 3035	Section 3 L4.1	Noise	Compliant		4.6 Noise
SSD 7016	C15	Independent Environmental Audit	Non-compliant	Communication made with Department of Planning however still awaiting endorsement	6 Independent Audit
EPL 3035	R3	Off-site fugitive fibre discharge	Non-compliant		7.2 Non-Conformances

1.2 Introduction

The Development forms part of the wider Oberon Timber Complex, manufacturing a range of MDF products (Custom wood) and particleboard including:

- Standard MDF;
- Moisture Resistant MDF;
- E0 (Low Formaldehyde Emitting) MDF;
- Ultraprime MDF Mouldings;
- Decorative Laminated MDF and Particle Board;
- 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; and
- Particleboard flooring products for structural applications.

Figure 1 Regional context



1.3 Consent

Development Consent SSD 7016 was issued by the Minister for Planning on 29 May 2017 to construct and operate a particleboard facility, and continuation of and alterations and additions to, the existing medium density fibreboard facilities.

Condition A26 of SSD 7016 required Borg to modify DA27/95. Borg submitted a Section 96 Modification Application requesting removal of condition A26 as compliance with it was not possible. This application also included a minor change to the orientation of the material handling building at particleboard, an increase to the warehouse footprint and amendments to the stormwater management system at the northern section of the site. A determination was received from the Department approving this application on 20 November 2018 (SSD 7016 MOD 1 – Site layout changes).

Under Modification of Development Consent SSD 7016 MOD 2 Borg proposed to install a high-pressure natural gas pipeline connection and turbine, and ancillary equipment to produce electricity and utilise waste exhaust heat in the particleboard manufacturing process. The Minister for Planning provided approval for MOD 2 on 29 November 2019.

Activities proposed under Modification 3 included the installation of additional equipment to the materials handling area for better separation and removal of undesirable materials found in the recycled wood that is used in the production of particleboard, and the addition of an enclosed awning to the northern end of the Northern Warehouse for more optimized truck loading/unloading. Works to the site stormwater management system were also proposed under MOD 3. These included reclamation of the overflow effluent pond and reinstatement at another location to allow for further hardstand, and changes to the stormwater conveying swales and ponds to allow construction of the hardstand and also to separate surface water flows between the Development and the Highland Pine Panels ('HPP') site, including the construction of a new HPP discharge point.

Approval was provided by the Minister of Planning for MOD 3 on 22 May 2020.

An application to modify SSD 7016 (Modification 4) was submitted to the Department of Planning and Environment on 26 October 2021. Activities proposed under MOD 4 included the following:

- reclamation of the remaining portion of the man-made spring fed dam to allow for increase in the size of the hardstand at the north eastern corner of the site 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 lined effluent storage dam for the water treatment plant; and
- construction of a new road within the site to better facilitate traffic flow.

Approval was provided by the Minister of Planning for MOD 4 on 20 May 2022.

An application to modify SSD 7016 (Modification 5) was submitted to the Department of Planning and Environment on 21 December 2023. Activities proposed under MOD 5 included the following:

- Minor alterations and additions to the approved mechanical workshop including three additional workshop bays,
- additional first floor storage within the workshop and,
- minor updates to the office.

Development justification for the proposed modification:

- Improve the infrastructure required to support the existing activities
- Enable larger mechanical repair workshop for the growing fleet of vehicles increase the number of workshop bays from seven to ten (three additional bays)
- Include a dedicated automated truck washing machine and parking area for large vehicles
- Support a safer working environment for the employees and reduce the potential of outdoor work activities

Approval was provided by the Minister of Planning for MOD 5 on 23 April 2024.

A summary of development consents including modifications applicable to Borg is presented in Table 2.

Table 2 Facility Development Consents

Consent Description	Approval Date	Approval Authority	Approved Development
Development Consent SSD 7016	29 May 2017	NSW Minister for Planning	Construction and operation of a particle board facility and continuation of, and alterations and additions to, the existing medium density fibreboard facility.
Development Consent SSD 7016 MOD 1	20 November 2018	NSW Minister for Planning	Site layout changes Surrender of DA27/95
Development Consent SSD 7016 MOD 2	29 November 2019	NSW Minister for Planning	Installation of an electricity generating gas turbine and ancillary equipment
Development Consent SSD 7016 MOD 3	22 May 2020	NSW Minister for Planning	Additional material handling equipment, extension to the Northern Warehouse, changes to the site surface water system and construction of further hardstand.

Consent Description	Approval Date	Approval Authority	Approved Development
Development Consent SSD 7016 MOD 4	20 May 2022	NSW Minister for Planning	Reclamation of the spring fed dam, increase in hardstand at the north eastern corner of the site, relocation of existing mechanic's workshop, modernisation of multidaylight press and changes to its exhaust air emissions, addition of an enclosure to water treatment biological tanks, installation of reverse osmosis filtered water production, construction of chemical storage shed, construction of a lined effluent storage dam and construction of a new road.
Development Consent SSD 7016 MOD 5	23 April 2024	NSW Minister for Planning	Minor update to the approved mechanical workshop including additional workshop bays, additional first floor storage and minor updates to the office Removal of the refuelling station

1.4 Annual Review Requirements

The Annual Review requirements provided for by condition C11 of Development Consent SSD 7016 have been summarised in Table 3, alongside the relevant sections of this document where those requirements are addressed.

Table 3 Annual Review Requirements

Development Consent SSD 7016 – Condition C11	Section of Annual Review
By 31 July 2017, and each year thereafter, unless otherwise agreed by the Secretary, the Applicant must review and submit a report to the Secretary detailing the environmental performance of the Development to the satisfaction of the Secretary. This review must:	This Report
(a) describe the development that was carried out during the reporting period, and the development that is proposed to be carried out over the next reporting period;	Section 2 Section 8
(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous reporting period, which includes a comparison of these results against the: <ul style="list-style-type: none"> i. relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; 	Section 4 Section 5
(c) identify any non-compliance during the reporting period, and describe what actions were (or are being) taken to ensure compliance;	Section 4 Section 7
(d) identify any trends in the monitoring data over the life of the Development;	Section 4
(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and	Section 4

Development Consent SSD 7016 – Condition C11	Section of Annual Review
(f) describe what measures will be implemented over the next reporting period to improve the environmental performance of the Development.	Section 8

1.5 Environment Protection Licence

Borg operates in accordance with Environment Protection Licence 3035 (EPL 3035), issued on 14 February 2001 by the NSW Environment Protection Authority (EPA) under Section 55 of the *Protection of the Environment Operations Act 1997*. The current Licence version date is 23 September 2023.

The EPL was varied and updated during this reporting period to include a Pollution Studies and Reduction Program. The PRP incorporated the following elements:

- U1 Cyclone Upgrades 'Conti 1' U1.1 By 28 July 2023, the Licensee must submit in writing to the EPA a proposed construction schedule, including completion timeframes for the upgrade works to be undertaken on 'Conti 1' (as labelled in "Borg response Environment Protection Authority - NSW Page 23 of 29 Licence version date: 14-Sep-2023 Section 55 Protection of the Environment Operations Act 1997 Environment Protection Licence - 3035 to Draft Notice of Variation no.1629923 - Annexure (A)" (DOC23/652780).
- U1.2 By 04 August 2023, the Licensee must submit to the EPA, a qualitative assessment or manufacturer's guarantee that the proposed works to be undertaken as per U1.1 will be able to satisfy the requirements of the "Protection of the Environment Operations (Clean Air) Regulation 2022".
- U1.3 Commencing on 11 August 2023, the Licensee must submit a quarterly 'Progress Report' in writing to the EPA until works are completed. The report/s must contain at a minimum but not be limited to the following: a. A progress report of works identified in 'U1.1', b. Any documentation or photographic evidence to support the report, c. Any known or perceived delays that may affect the project's final completion date. The Licensee must notify the EPA in writing within 7 days of the completion of works identified in U1.1.

1.6 Water Licences

Borg holds a Water Access Licence for use of groundwater in operations. Current licence details issued under the *Water Management Act 2000* are summarised in Table 4. Borg harvested 2,035,000 Litres of spring water during the reporting period at an average of 32,000 litres per harvest.

Table 4 Water Licences

Approval Details	Approval Number	Validity of Licence	Approval Kind	Extraction Limit
WAL28951	80WA715797	16 January 2012 – 01 March 2026	Water Extraction	28 Units

1.7 Trade Waste Licence

Borg's Trade Waste Service Contract with Oberon Council for the discharge of liquid trade wastes into Council's sewerage system was not applicable this reporting period as there was no renewal of the licence. Liquid trade waste is now treated on site.

1.8 Environmental Management Plans

As per Schedule 2 Part C of SSD 7016, construction activities continue to be undertaken in accordance with the Construction Environmental Management Plan (CEMP) and the existing development in accordance with the Operational Environmental Management Plan (OEMP) and associated sub-plans.

In accordance with C10 Revision of Strategies, Plans and Programs, environmental management plans were reviewed, and minor amendments made where necessary. In this review period the following Plans were updated:

- Traffic Management
- Waste Management
- Noise Management
- Mobile Wood Chipper Management
- Erosion and Sediment Management
- Spring Fed Dam Reclamation Management Plan
- Operational Noise Management
- Surface Water Management
- Waste Management
- Operational Air Management
- Urban Wood Residue Management Plan

1.9 Contacts

Table 5 outlines the contact details for site personnel responsible for managing environmental operations at the Development.

Table 5 Site Personnel

Name	Title	Contact Details
Richard Kaine	Facility Manager	0409 151 094
Victor Bendeviski	Environmental and Regulatory Compliance	(02) 4340 9800
Andrew Brady	Environmental Manager	0447 765 913

1.10 Actions Required from Previous Annual Review

The actions listed in Table 6 were identified in the 2022/23 Annual Review for implementation during this 2023/24 reporting period.

Table 6 Proposed Activities in 2022/23 Reporting Period

Activities Proposed in 2022/23 Reporting Period	Results achieved in 2023/24 Reporting Period
Ongoing implementation of Environmental Management Plans for the existing development and the project.	Ongoing implementation of the OEMP, CEMP and sub plans including environmental inspections undertaken at least monthly. Inspections recorded and actions assigned accordingly, and use of DataStation to track progress and close out. CEMP, OEMP and sub plans reviewed, and updates performed where: a) changes to site operations (existing and project); and b) in accordance with SSD 7016 C10.
Continue with implementation of various management and mitigation measures as detailed in the development consent, including additional items provided in SSD 7016 MOD 1, MOD 2, MOD 3 and MOD 4	As reported in this Annual Review. All additional conditions imposed by modifications have been incorporated into Borg's tracking document OBERON Approvals and Licensing Compliance Register.
Complete works as approved under MOD 4	Works commenced once approval was granted. Works will continue into the next reporting period. Progress made on the filling of the Spring Dam during the reporting period. No other projects associated with MOD 4 were commenced.
Undertake rehabilitation works to areas disturbed by construction activities	Stormwater swales impacted by construction activities established good groundcover to assist with managing erosion control and sediment mobilisation which can affect stormwater quality discharge. Ongoing rehabilitation and modification works will continue on-site to ensure good water management practices.
Discuss with EPA licensed water discharge points, referencing EPL 3035, to ensure this is fit for purpose	Discussions with EPA were had within this reporting period. EPA were generally satisfied with the current sampling locations and plan as a short-term solution. Short term solutions were carried out successfully and the stormwater swales were reinstated, joining back into the Flush 1 Basin (using EPA Pt 28 Discharge location).
Continue erosion and sediment control inspections and rectification works as necessary to manage storm water quality discharge as well as reinstate the original HPP swale design once high voltage electrical works have been completed (movement of powerlines from above ground to below).	Extensive earthworks and erosion and sediment controls implemented along with the swales separated back to their original state so that the water can be differentiated between HPP surface water and StructaFlor surface water.

2 Operations during the Reporting Period

2.1 Production

Development Consent SSD 7016 allows for production of up to 380,000 m³ of MDF and 500,000 m³ of particleboard per calendar year. During this reporting period the following quantities were manufactured at the Development: 312,123m³ of MDF and 348,955m³ of particleboard, along with a total intake of approximately 125,000 tonnes of UWR.

2.2 Facility Improvements

The following improvements were made to site infrastructure, plant and/or equipment during the reporting period:

- Installation of a dust collector at the Particle Board line wood recycling area, eliminating fugitive fibre escape when removing collected materials allowing reuse and reducing gas usage in the dust burner.
- Installation and commissioning of ECS (Eddy current separator/Non-Ferrous material) at the recycled wood area of Particle board were completed.
- Installation of conveyor and blow line for removal of oversize material from Particle Board Air graders for recycled wood. This removed the need for open bin storage that needs manual removal operations to be completed.
- Conti 4- upgrade screw conveyor at air the Air grader oversize material removal. This eliminated blockages and operator intervention and reduced downtime by 90%.
- Conti 4-Installation of heating duct to main fibre bin to eliminate condensation build up causing reject and down time.
- MDF Reclaimer 1 repair/upgrade- Installation of new outfeed conveyor and steel structure for chip supply to Conti 1 & 4.
- Installation of new fuel feed conveyors and magnet at the Energy Plants.
- Replacement of both C1 Cyclone upper sections, restoring performance.

See Figure 2 for location of site infrastructure.

2.3 Site Activities

The following activities associated with the modifications to existing operations occurred during the reporting period:

- Ongoing updates and alterations to the site surface water channels at the southern area of the site to better manage high flows and to divert the flows away from the neighbouring Woodchem facility to improve flood mitigation.
- Extensive erosion and sediment control works to the northern and eastern swale system to improve discharge water quality including rectification to eroded sections, installation of rock check dams in areas of high flow and improvements to the inflow path to the first flush basin.
- Earthworks completed as part of Mod 4 facilitating the reconnection of stormwater swales back to their original state so that the water flow are not comingled between Highland Pine Panels (HPP) and Borg/StructaFlor surface water.
- Continued to receive recycled wood material under *The Borg Panels Urban Wood Residue order and exemption March 2021* for inclusion in the production of particleboard.
- Continued works to reclaim the spring dam in the northeastern corner of the site to make way for the proposed mechanic's workshop whilst maintaining spring water flow into the tributary that leads to Kings Stockyard Creek.

Environmental commitments and management/mitigation measures that were applied during the reporting period include the following:

- operational works undertaken in accordance with the Operational Environmental Management Plan and sub-plans;
- construction works undertaken in accordance with the Construction Environmental Management Plan and sub-plans;
- attended noise verification monitoring;

- air emission verification monitoring;
- water quality sampling events;
- site environmental inspections; and
- site wide communication of environmental requirements via EHSR Alerts and Toolbox Talks.

2.4 Wood Recycling Program

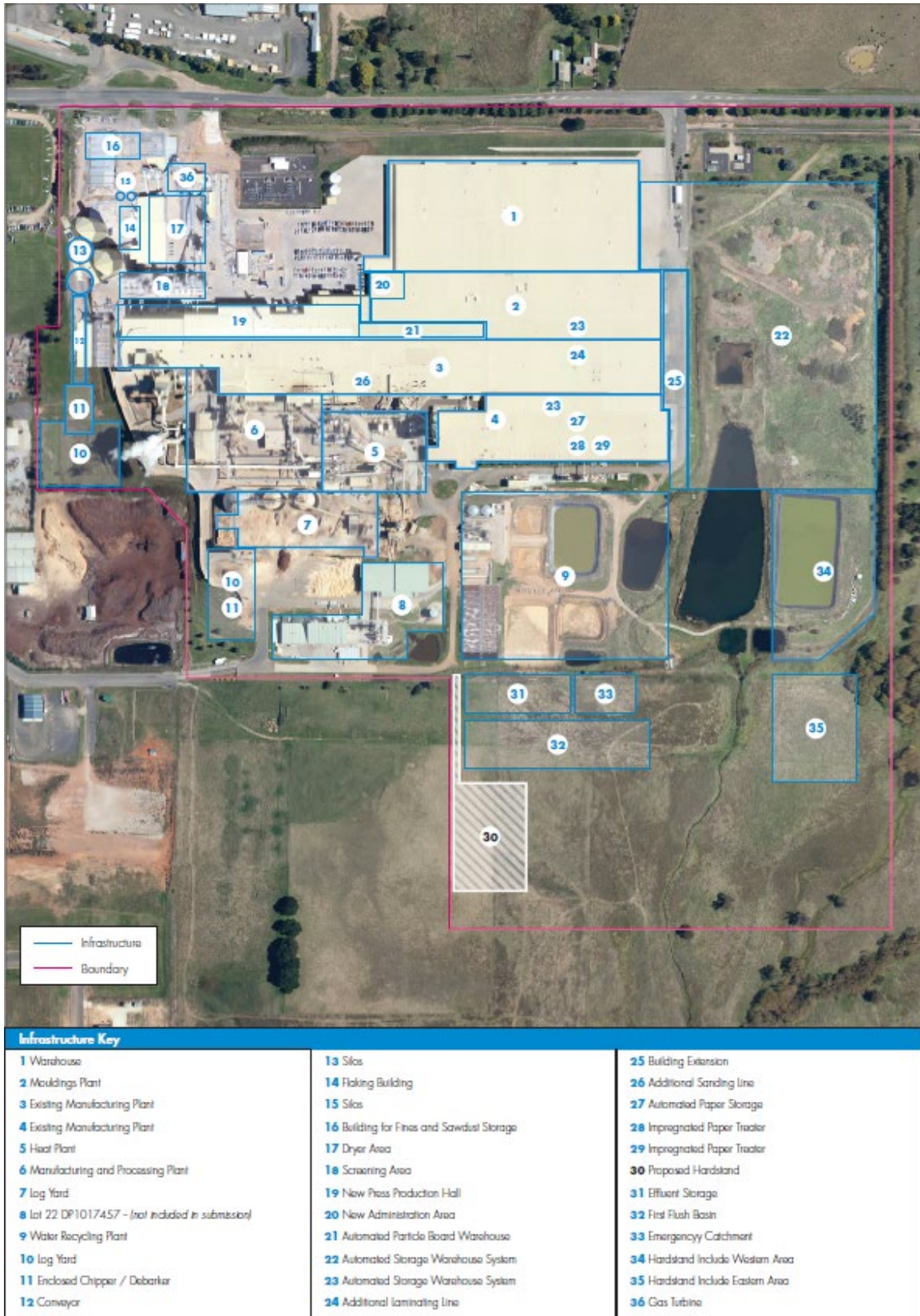
During this reporting period Borg continued to accept recycled wood materials in accordance with *The Borg Panels Urban Wood Residue order and exemption March 2021*. Approximately 125,000 tonnes of UWR was received on site for inclusion in the production of particleboard. The recycled material is aggregated at one of two Borg sites located in Sydney where it is inspected prior to delivery to Oberon. When this material arrives at Oberon via truck transport it is again inspected as it enters the site, this is conducted by spreading the materials out on a hardstand before being incorporated into the manufacture of particleboard.

As part of the RRO & RRE requirements additional air emission sampling was conducted on the 8th, 9th, 10th, 11th of August 2023, 12th, 13th and 27th of October 2023, 12th and 13th of December 2023 and 26th and 27th of March 2024 in accordance with EPL 3035 condition M2.2 and included license discharge points 29, 30, 31 and 32 (points associated with air emissions from the recycled wood program) for the following pollutants:

- Total solid particles
- Fine particulate matter (PM10)
- Formaldehyde
- Nitrogen oxides
- Type 1 & 2 Substances
- Smoke

Results from the stack testing were generally all within EPL 3035 specified air concentration discharge limits. See section 4.3.3 Air Monitoring of this report for emission monitoring results.

Figure 2 SSD 7016 Approved Development Area



3 Waste Management

Waste generated at The Development is managed in accordance with the Waste Management Plan that has been developed for the facility. The management process incorporates a system of recycling and reuse of waste materials where possible. Waste that cannot be incorporated into this system is removed from site and taken to landfill for lawful disposal.

3.1 Solid Waste

A summary of waste removed from The Development during the reporting period is provided in Table 7.

Table 7 Waste Management 2023/24

Month	Description				Destination
	Litres	m3	Tonnes	Waste	
Apr 2024		155		ash	Oberon Council Waste Depot
		906		general	Oberon Council Waste Depot
			2.02	mixed commercial	Bathurst Regional Council
Mar 2024		926		general	Oberon Council Waste Depot
			20	mixed commercial	Bathurst Regional Council
Feb 2024		950		general	Oberon Council Waste Depot
			49.3	mixed commercial	Bathurst Regional Council
Jan 2024		605		general	Oberon Council Waste Depot
				mixed commercial	Bathurst Regional Council
				(blank)	Bathurst Regional Council
Dec 2023		610		general	Oberon Council Waste Depot
			15.12	mixed commercial	Bathurst Regional Council
			8.72	waste requiring burial	Bathurst Regional Council
Nov 2023		760		general	Oberon Council Waste Depot
			8.92	mixed commercial	Bathurst Regional Council
			1.06	waste requiring burial	Bathurst Regional Council
Oct 2023		700		general	Oberon Council Waste Depot
			8.78	mixed commercial	Bathurst Regional Council
			1.16	waste requiring burial	Bathurst Regional Council
Sep 2023		775		general	Oberon Council Waste Depot
			9.84	waste requiring burial	Bathurst Regional Council
Aug 2023		720		general	Oberon Council Waste Depot
		28.9		waste requiring burial	Bathurst Regional Council
Jul 2023		660		general	Oberon Council Waste Depot
			19.84	waste requiring burial	Bathurst Regional Council
Jun 2023		110		general	Bathurst Regional Council
May 2023		640		general	Bathurst Regional Council
			47.22	waste requiring burial	Bathurst Regional Council
				general	
				waste requiring burial	
Total		8545.9	191.98		

Waste types in Table 7 are further described as:

- General waste including a mix of both putrescible and non-putrescible waste;
- Waste requiring burial made up of urea formaldehyde, spade-able resin, paraffin wax bladders and ash materials;
- Building and demolition waste including concrete, metal and timber are recycled when appropriate; and
- Used oils from the plant process oil systems and mechanical workshop are recycled off site via third parties. All waste oil is considered trackable. All waste oil collected during the reporting period was collected by waste transporter EPL 7100 and taken to waste facility EPL 854.

3.2 Trade Waste

Borg's Trade Waste Service Contract with Oberon Council for the discharge of liquid trade wastes into Council's sewerage system was not applicable during this reporting period as there was no renewal of the licence. Liquid trade waste is treated on site.

4 Environmental Monitoring and Performance

4.1 Environmental Management System

Borg operates in accordance with the Operational Environmental Management Plan (OEMP) as documented in Section 1.8. This OEMP aims to ensure adequate management, monitoring and mitigation systems are in place to protect the surrounding environment. Similarly, construction activities are undertaken in accordance with the Construction Environmental Management Plan (CEMP).

Environmental monitoring is conducted in accordance with the requirements of SSD 7016, its subsequent modifications (MOD1, MOD2, MOD3, MOD4 & MOD5), and EPL 3035. Environmental monitoring is an integral part of Borg's environmental management system. The measurement and evaluation of monitoring results allows for the assessment of performance against quantitative and qualitative standards and assists in the identification of any non-conformances or areas that may require additional attention.

4.2 Meteorological Data

Borg operates and maintain a meteorological monitoring station located east of the existing Spring Dam (EPA Point 26). The meteorological station was inspected and serviced on 17 April 2024 by a trained third-party consultant from Envirodata Weather Stations Pty Ltd

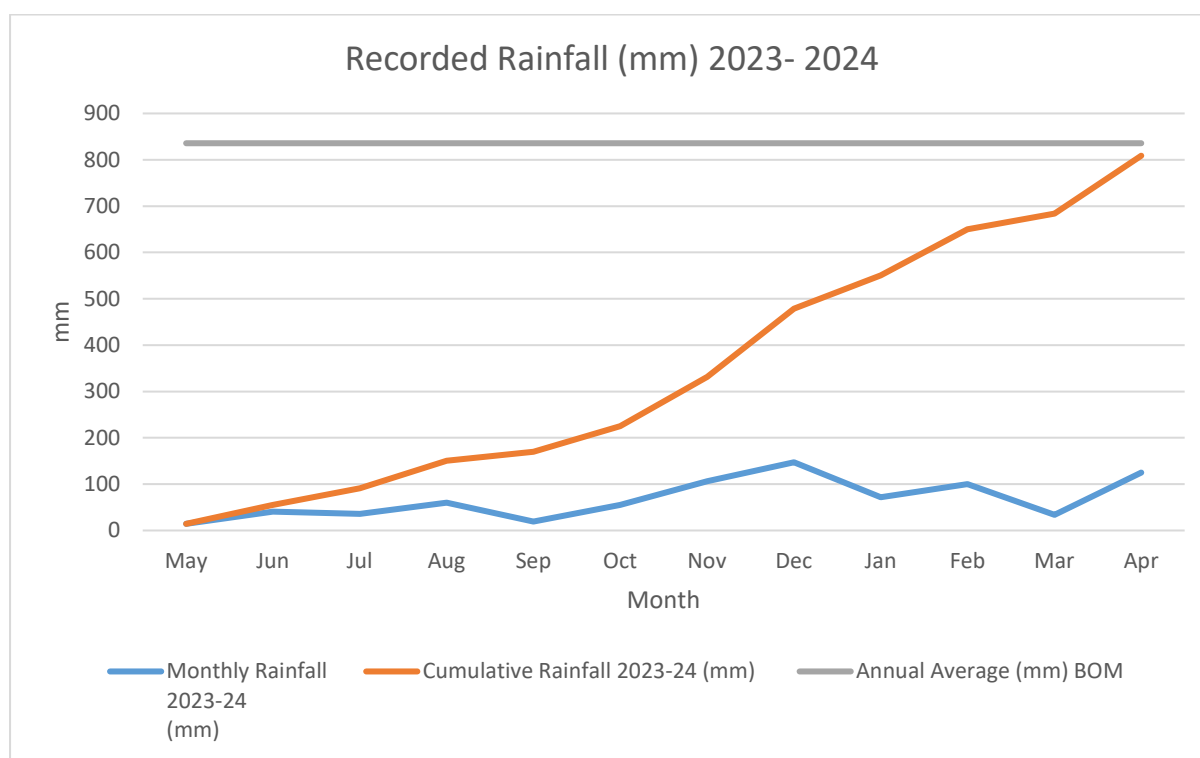
The following section summarises the meteorological data for the 2023/24 reporting period.

4.2.1 Rainfall

The total monthly rainfall (mm) and number of rain days during this reporting period recorded at EPA Point 26 is shown in Table 8 and displayed in Figure 3 below. Total recorded rainfall for the period was 808.8mm. This is 26.9mm below the annual mean rainfall of 835.7mm for the Oberon region (Bureau of Meteorology, Oberon Springbank Site No. 063063).

Table 8 Recorded Rainfall 2023/24

Total Monthly Rainfall (mm)												
May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
14.4	40.8	35.6	59.8	19.4	55	106.4	147.2	71.6	100	33.8	124.8	808.8
Number of Rain Days (≥0.2mm)												
23	21	21	21	27	28	21	19	20	19	23	22	265

Figure 3 Recorded Rainfall (mm) at Borg Meteorological Station 2023/24

4.2.2 Temperature

Monthly maximum and minimum temperatures recorded from the site weather station during the reporting period are shown in Table 9.

Table 9 Monthly Minimum and Maximum Temperatures 2023/24

Minimum and Maximum Monthly Temperatures (°C)												
May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	
-4.7	-6.5	-6.1	-2.6	-2.2	0.6	2.3	5.2	6.4	8.3	3.6	-0.9	
16.8	15.8	15.1	16.8	24.7	27.1	28	33.4	30.4	33.1	30.1	24.4	

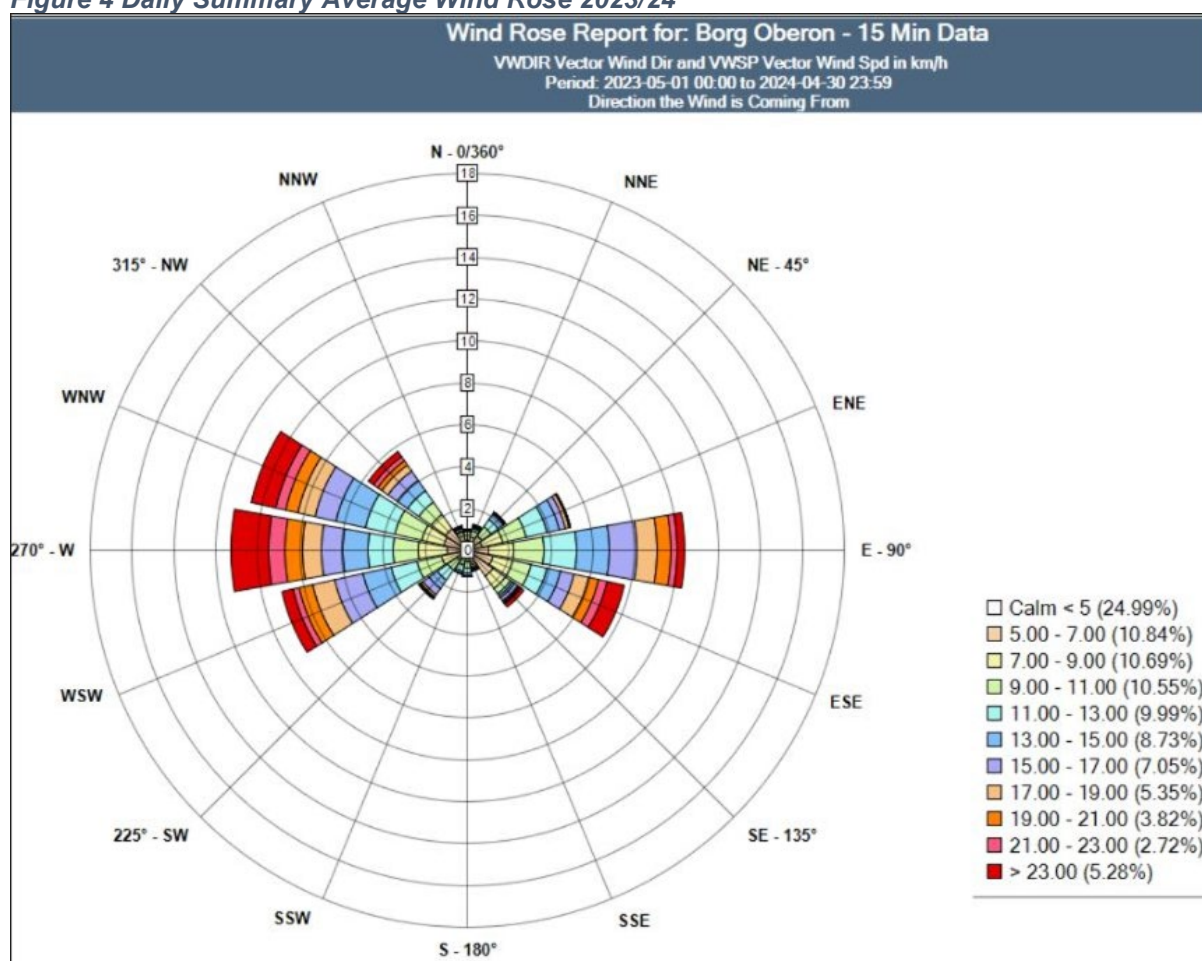
4.2.3 Wind Speed and Direction

The site weather station recorded wind speed and direction data is summarised in Table 10. The annual wind rose for the reporting period is displayed in Figure 4. As can be seen in Table 10 and Figure 4, the dominant wind direction during this reporting period was from an easterly direction.

Table 10 Monthly Daily Wind Data 2023/24

Month	Maximum Wind Speed (km/hr)	Mean Wind Speed (km/hr)	Dominant Wind Direction
May 2023	52.9	11.1	207.4° (SSW)
June 2023	43.1	12.3	223.3° (SW)
July 2023	44.5	11.3	212.8° (SSW)
August 2023	47.1	9.1	194.6° (SSW)
September 2023	44.4	9.7	194.9° (SSW)
October 2023	60.1	13.2	203.8° (SSW)
November 2023	38.3	10.4	157.6° (SSE)
December 2023	48	11.5	191.1° (S)
January 2024	47.7	12.3	150.7° (SSE)
February 2024	42.5	11.5	149.2° (SSE)
March 2024	37.6	9.3	135.3° (SE)
April 2024	40.1	8.7	173.4° (S)

Figure 4 Daily Summary Average Wind Rose 2023/24



4.3 Air Quality

4.3.1 Dust Depositional Gauges

Dust deposition monitoring is undertaken in accordance with Borg's Operational Air Quality Management Plan (OAQMP). Condition O3 of EPL 3035 states that:

The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

EPL 3035 does not specify dust deposition monitoring be undertaken, Borg conducts this to assist with site management. The air quality criteria adopted for deposited dust is provided in Table 11.

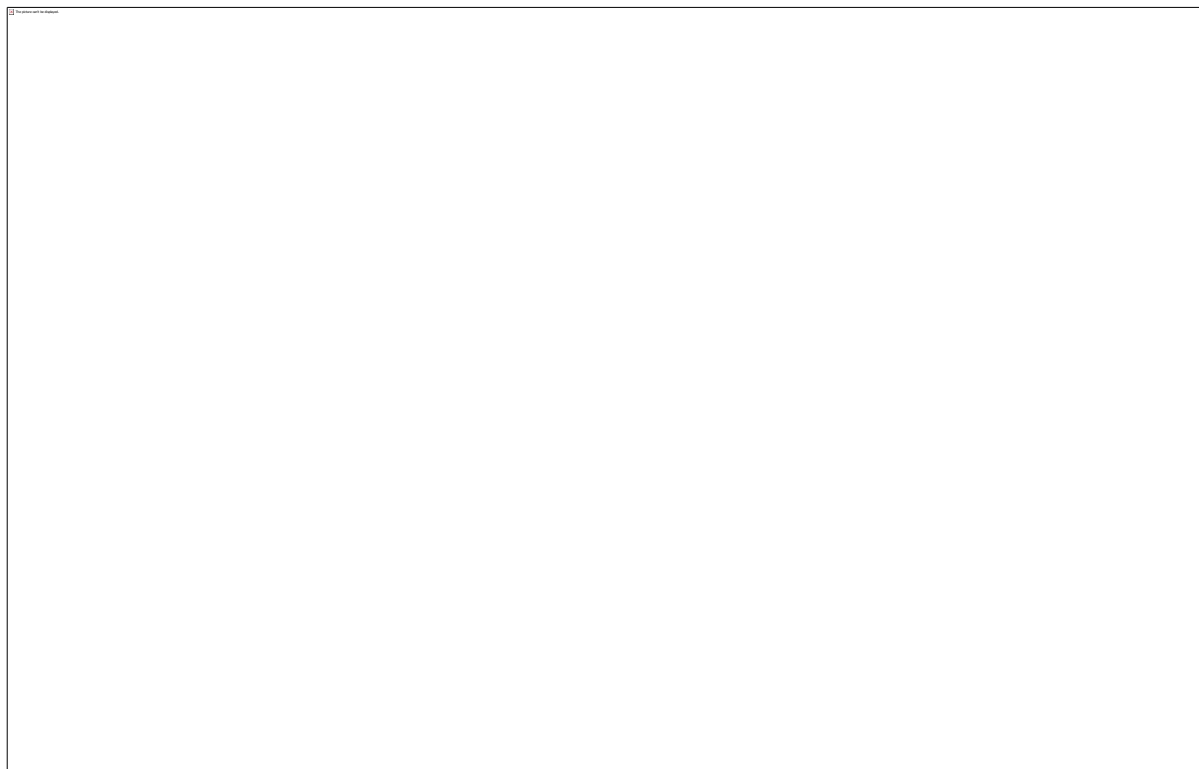
Table 11 Air Quality Criteria Deposited Dust

Averaging Period	Impact	Criteria
Annual	Incremental	2 g/m ² /month
	Total	4 g/m ² /month

There are six dust depositional gauges (DMG) located in and around the site. The six gauges were sampled monthly throughout the year from May to April. The locations of dust depositional gauges are listed in Table 12 and shown in Figure 5.

Table 12 Location of Dust Depositional Gauges

Dust Depositional Gauge	Location Description
DMG 1	The Development eastern boundary with Woodchem
DMG 2	Materials handling building
DMG 3	Water treatment plant
DMG 4	Northern boundary
DMG 5	Highlands Motor Inn, South of the Development
DMG 6	Albion Street, East of the Development

Figure 5 Depositional Dust Gauge Locations

DMGs 1 to 4 are located at the periphery of the site. DMG 1 is located within the operational boundary of the site immediately adjacent to an unsealed laydown area and in general proximity of an unsealed road. DMG 2 is located adjacent to the materials handling building. DMG 4 is located towards the northern boundary in an area of unsealed compacted surfaces used for storage of large pieces of machinery and reusable material such as steel.

Deposited dust is assessed as insoluble solids as defined by *Standards Australia AS3580.10.1-2003: Methods for Sampling and Analysis of Ambient Air – Determination of Particulates – Deposited Matter – Gravimetric Method*. During the reporting period all dust samples were collected by trained specialists and analysed by NATA certified laboratories.

Table 13 Dust Depositional Gauges Annual Average

No.	Location	Annual Average Insoluble Solids (g/m ² /month) 2021/22	Annual Average Insoluble Solids (g/m ² /month) 2022/23	Annual Average Insoluble Solids (g/m ² /month) 2023/24
DMG 1	The Development eastern boundary with Woodchem	7.9	5.9	5.3
DMG 2	Materials handling building	5.8	5.1	3.6
DMG 3	Site Meteorological station	1.2	1.3	2.2
DMG 4	Northern boundary	1.3	1.0	0.8
DMG 5	Highlands Motor Inn	0.9	0.9	0.8
DMG 6	Albion Street east of the Development	0.8	1.0	0.7

Table 13 shows DMG 1, returned an exceedance of the annual average criteria of 4g/m² for insoluble solids however, it had decreased in the annual average when compared to the last two year's reporting periods. DMG 1 is exposed to regular traffic and day-to-day activities adjacent internal dirt roads.

DMG 3 was the only gauge to have increased in annual average insoluble solids. This may be due to its location which is in close proximity to the earth works which had been taking place surrounding Mod 4 filling of the spring dam. Although the site water cart had been in use for dust suppression throughout the reporting period this year had a lower than average rainfall, so conditions were relatively dry.

There were no exceedance of the dust deposition criteria (4g/m²) at locations DMG 2, DMG 3, DMG 4, DMG 5 and DMG 6 for the 2023/24 reporting period.

All gauges showed a decrease in the average annual for insoluble solids when compared to the previous two years except for DMG 3 which showed a slight increase compared to last year's data. DMG 3 however was still below the criteria of 4g/m².

4.3.2 Air Emissions Monitoring Points

The locations of air emission monitoring points are listed in Table 14 and are consistent with monitoring/discharge points noted in EPL 3035 licence version date 14 September 2023.

Table 14 Location of Air Emissions Monitoring

EPA Identification No.	Description
4	DC1 Baghouse
5	DC2 Baghouse
7	Conti 2 Stage 1 Dryer Cyclone #1 (west)
8	Conti 2 Stage 1 Dryer Cyclone #2 (east)
9	Conti 1 Dryer Cyclone #1 (south)
10	Conti 1 Dryer Cyclone #2 (north)
11	Conti 2 Heat Plant
12	Press Vents Conti 1
17	Conti 1 Heat Plant
18	Press exhaust vents
19	Dryer stack
20	Reject cyclone DC 11
21	Reject cyclone DC 12
22	Reject cyclone DC 13
27	Combined Conti 2 Press Vent
29	Forming Line Baghouse
30	Form Station Baghouse
31	Particleboard Press Extraction

EPA Identification No.	Description
32	Wet Electrostatic Precipitator (WESP)
33	Cogeneration Unit 1
34	Cogeneration Unit 2

EPA Identification Points 18, 19, 20, 21 and 22 are recognised as discharge points in EPL 3035 however there is no requirement to monitor the concentration of pollutants discharged at these points. Plant associated with these points has previously been dormant however it was the subject of MOD4 and will be added back to the license once Conti 4 has been commissioned and in operation.

Points 11 and 17 do not produce flow. The exhaust from Conti 2 heat plant (Point 11) is ducted back into Conti 2 dryer cyclones (Points 7&8), and exhaust from Conti 1 heat plant (Point 17) is ducted back into the Conti 1 production system (Points 9&10).

4.3.3 Air Monitoring

Environment Protection Licence 3035 sets pollution concentration limits for emission Points 7, 8, 9 and 10 as shown in Table 15. All plant and equipment must comply with the relevant concentration standards listed in Schedule 2, 3 and 4 of the *Protection of the Environment Operations (Clean Air) Regulation 2010* where pollution limits are not specified in the EPL. Monitoring results are assessed against these criteria to determine compliance with air emission limits.

Table 15 EPL 3035 Air Concentration Limits

Pollutant	ID Point	Units of Measure	100 Percentile Concentration Limit	Reference Condition	Oxygen Correction	Averaging Period
Total Solid Particulates	7,8,9,10	mg/m ³	200	n/a	n/a	n/a
Formaldehyde	7,8,9,10	mg/m ³	5	n/a	n/a	n/a
Total Solid Particulates	29,30	mg/m ³	10	Dry, 273 K, 101.3 kPa	n/a	n/a
Total Solid Particulates	31,32	mg/m ³	50	Dry, 273K,101.3k Pa	n/a	n/a
Type 1 and Type 2 substances in aggregate	32	mg/m ³	0.5	n/a	n/a	1 hour
Nitrogen Oxides	33,34	mg/m ³	450	Dry, 273K,101.3k Pa	5%	1 hour
Volatile organic compounds	33,34	mg/m ³	20	Dry, 273K,101.3k Pa	5%	1 hour

Source: EPL 3035 (14 September 2023)

Air emission monitoring was undertaken by trained specialists and samples analysed by NATA accredited laboratories. Monitoring equipment is maintained by the consultant and calibrated in accordance with the manufacturer's specifications by qualified specialists. This monitoring is performed in accordance with the methodologies as specified in the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales* and the requirements of EPL

3035. USEPA Method GD-008 is the approved method for determining flow rate and sampling for particulate matter in cyclonic flow from licenced discharge Points 7, 8, 9 & 10.

For each discharge point identified in Table 14 above, Borg monitored the concentration of each pollutant as specified in EPL 3035. The results for this period are compared against results from the previous two years as displayed in Tables 16 to 33.

Table 16 Air Emissions Monitoring Results EPA Identification Point 4

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	<2	<12	-
Formaldehyde	mg/m ³	Yearly	11	4.2	-

Table 17 Air Emissions Monitoring Results EPA Identification Point 5

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	<2	<3	-
Formaldehyde	mg/m ³	Yearly	5.6	4.1	-

Table 18 Air Emissions Monitoring Results EPA Identification Point 7

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	28	38	35
Formaldehyde	mg/m ³	Yearly	4.2	21	3.3
Nitrogen Oxides	mg/m ³	Yearly	250	220	180
PM10	mg/m ³	Yearly	11	12	19
Smoke Emissions	Obscuration	Every 6 months	0	0	0

Table 19 Air Emissions Monitoring Results EPA Identification Point 8

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	25	47	-
Formaldehyde	mg/m ³	Yearly	4.6	1.3	1.9
Nitrogen Oxides	mg/m ³	Yearly	220	230	-
PM10	mg/m ³	Yearly	10	16	-
Smoke Emissions	Obscuration	Every 6 months	0	0	0

Table 20 Air Emissions Monitoring Results EPA Identification Point 9

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	12	32	18
Formaldehyde	mg/m ³	Yearly	3.6	3.7	4.8
Nitrogen Oxides	mg/m ³	Yearly	84	160	190
PM10	mg/m ³	Yearly	6.8	21	-
Smoke Emissions	Obscuration	Every 6 months	0	0	0

Table 21 Air Emissions Monitoring Results EPA Identification Point 10

Pollutant	Units	Frequency	2021/22	2022/23	2023/24
Total Solid Particles	mg/m ³	Yearly	17	190	19
Formaldehyde	mg/m ³	Yearly	3.3	3.2	1
Nitrogen Oxides	mg/m ³	Yearly	48	140	110
PM10	mg/m ³	Yearly	8.3	47	47
Smoke Emissions	Obscuration	Every 6 months	0	0	0

Due to external third-party consultant availability and plant downtime, some emissions monitoring points were not analysed during the 2023/24 reporting period (EPA Point 4, 5, 12, 27, 29 and 30, however these points were covered in the following months. All results that have been received during the writing of this report which fell outside the reporting period have been compliant and will be reported in the next Annual Review (2024/25).

Table 18 shows a significant reduction in Formaldehyde when compared to last years data. The levels recorded in this years reporting period were 17.7 mg/m³ less than the previous year. There was also a reduction in nitrogen oxides and total solid particles.

All results shown in Tables 16 to 21 are within EPL 3035 limits as well as the *Protection of the Environment Operations (Clean Air) Regulation 2022*.

Table 22 Air Emissions Monitoring Results EPA Identification Point 12 Vent 1

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Every 3 years	-	-	-
Formaldehyde	mg/m ³	Every 3 years	-	-	-
Nitrogen Oxides	mg/m ³	Every 3 years	-	-	-
PM10	mg/m ³	Every 3 years	-	-	-

Table 23 Air Emissions Monitoring Results EPA Identification Point 12 Vent 2

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Every 3 years	-	-	-
Formaldehyde	mg/m ³	Every 3 years	-	-	-
Nitrogen Oxides	mg/m ³	Every 3 years	-	-	-
PM10	mg/m ³	Every 3 years	-	-	-

Table 24 Air Emissions Monitoring Results EPA Identification Point 12 Vent 3

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Every 3 years	-	-	-
Formaldehyde	mg/m ³	Every 3 years	-	-	-
Nitrogen Oxides	mg/m ³	Every 3 years	-	-	-
PM10	mg/m ³	Every 3 years	-	-	-

Table 25 Air Emissions Monitoring Results EPA Identification Point 12 Vent 4

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Every 3 years	-	-	-
Formaldehyde	mg/m ³	Every 3 years	-	-	-
Nitrogen Oxides	mg/m ³	Every 3 years	-	-	-
PM10	mg/m ³	Every 3 years	-	-	-

Table 26 Air Emissions Monitoring Results EPA Identification Point 27

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Yearly	12	4.5	-
Formaldehyde	mg/m ³	Yearly	7.2	1.6	-
Nitrogen Oxides	mg/m ³	Yearly	<4	<4	-
PM10	mg/m ³	Yearly	3.4	<4	-

Table 27 Air Emissions Monitoring Results EPA Identification Point 29

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Yearly	<2	<2	-
Formaldehyde	mg/m ³	Yearly	4.9	1.5	-
Nitrogen Oxides	mg/m ³	Yearly	<4	<4	-
PM10	mg/m ³	Yearly	<2	<3	-
Smoke Emissions	Obscuration	Yearly	0	0	-

Table 28 Air Emissions Monitoring Results EPA Identification Point 30

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Yearly	<2	2.3	-
Formaldehyde	mg/m ³	Yearly	1.3	1.0	-
Nitrogen Oxides	mg/m ³	Yearly	<4	<4	-
PM10	mg/m ³	Yearly	<3	<3	-
Smoke Emissions	Obscuration	Yearly	0	0	-

Table 29 Air Emissions Monitoring Results EPA Identification Point 31

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Yearly	30	49	72
Formaldehyde	mg/m ³	Yearly	1.5	0.86	5.4
Nitrogen Oxides	mg/m ³	Yearly	<4	<4	3
PM10	mg/m ³	Yearly	20	19	29
Smoke Emissions	Obscuration	Yearly	0	0	0

Table 30 Air Emissions Monitoring Results EPA Identification Point 32

Pollutant	Units	Frequency	2021/2022	2022/2023	2023/24
Total Solid Particles	mg/m ³	Yearly	39	34	4
Formaldehyde	mg/m ³	Yearly	2.3	0.032	2.4
Nitrogen Oxides	mg/m ³	Yearly	210	190	150
PM10	mg/m ³	Yearly	*	*	2.1
Smoke Emissions	Obscuration	Yearly	0	0	0

*Fine particulate testing could not be undertaken at this location due to excessively saturated gas stream

Table 30.1 Air Emissions Monitoring Results EPA Identification Point 32

Pollutant	Units	Frequency	Test 1	Test 2	Test 3
Type 1 and Type 2 substances in aggregate	mg/m ³	Quarterly	<0.12	<0.11	<0.11

Point 31 saw a slight increase in all analytes during the reporting period which may potentially be attributed to a shift in production priorities and recipes. Despite the increase the results remain within EPL 3035 and Protection of the Environment Operations (Clean Air) Regulation 2022 limits.

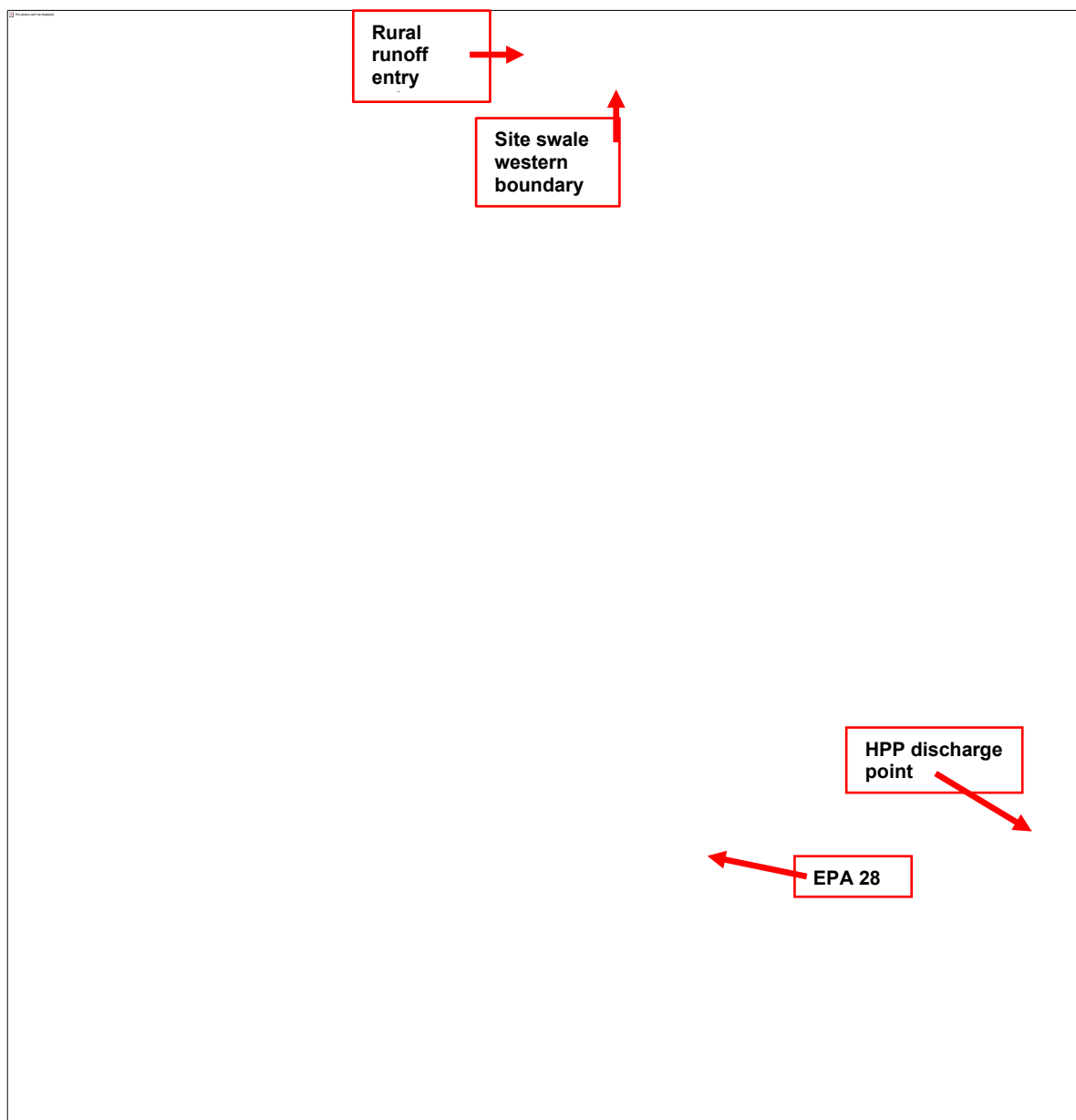
Point 32 generally saw an overall decrease in comparison to the previous year's results. There was however an increase of formaldehyde at the sampling location. Formaldehyde emissions can vary depending on plant operating conditions due to which product is being processed at the time of sampling. The results still remained within EPL 3035 and Protection of the Environment Operations (Clean Air) Regulation 2022 limits.

4.4 Surface Water

The existing surface water management system (see Figure 6) includes runoff from the Development and adjoining properties in the Oberon Timber Complex on the western side of Lowes Mount Road, and operates as follows:

- Runoff from StructaFlor and Highland Pine Products Sawmill 2 flows across Lowes Mount Road and directed onto the site via the swale on the western boundary
- Runoff from rural parcels of land on Lowes Mount Road is also directed into the site from the western boundary, conveyed via a 'clean' water swale, which runs alongside the site swale following the northern boundary before discharging at an independent HPP discharge point to a tributary of Kings Stockyard Creek
- The Development roof and surface runoff from the western side of the facility is directed into the boundary swale and transferred into the first flush basin
- Runoff from the eastern and open parts of the site, which contains fine fibrous wood material, is directed first to a gross pollutant trap (GPT) and then into the stormwater flush basin
- Any overflow from the existing stormwater flush basin is directed into the first flush basin
- Water captured in the basins is harvested by the site water treatment plant for reuse in the production system.
- Stormwater harvesting averaged 15.2m³/day over the reporting period the largest recorded volume of water harvested in one day was 81m³
- Runoff from construction areas is managed in accordance with Erosion Sediment Control Plans as part of the CEMP for SSD7016. Surface water from these zones is directed into the site swale then on to the stormwater basin
- Water discharges from EPL discharge Point 28, and HPP discharge point to a tributary of Kings Stockyard Creek (shown on Figure 6)

Figure 6 Surface water management system - SSD 7016



In accordance with EPL 3035, water quality monitoring is undertaken weekly during discharge to manage discharge compliance requirements. During this reporting period water discharge was from EPA Point 28, additionally samples were taken at the HPP discharge point.

The HPP discharge point was utilised temporarily for Borg/SF flows due to earthworks and powerline realignment. The powerlines have been removed and power now runs underground, and the connection back into the grid has occurred which allowed for the reconnection of the swale southern side swale back into Flush 1 (Point 28).

EPA Point 1 sampling location has been removed during construction and diversion works for as part of the Mod 4 spring dam reclamation. The removal of Point 1 from the EPL 3035 has been discussed but a formal License variation has not yet been completed to remove the conditions from the licence.

The concentration limits of a pollutant discharged from EPA 1, EPA 28 (and HPP discharge point) in EPL 3035 is shown below in Table 31.

Table 31 EPA Identification Point 1 and Point 28 Water pollution limits (also adopted for HPP Swale sampling location)

Pollutant	Units of Measure	50 percentile concentration limit	100 percentile concentration limit
Aldrin	µg/L		0.3
Biochemical Oxygen Demand (BOD)	mg/L		20
Colour	Hazen	80	160
Dieldrin	µg/L		0.3
Methylene Blue Active Substances (MBAS)	mg/L		0.5
Nitrogen (Total)	mg/L		10
Oil and Grease	mg/L		10
pH	pH		6.5-8.5
Phosphorus (Total)	mg/L		0.3
Total Suspended Solids	mg/L		50

Stormwater samples are collected by trained Borg personnel and are analysed by NATA certified laboratories. Full results for the 2023/24 reporting period are provided in Appendix B Surface Water Monitoring Data.

Table 32 provides a summary of Borg's historic annual average water monitoring results for discharge from EPA Point 1. No samples were taken from the discharge point as diversion works had commenced in the previous year reporting period.

Table 32 Annual Average Water Quality Monitoring Results EPA Point 1

Pollutant	Units of Measure	2019/20	2020/21
Aldrin	µg/L	0	0
Biochemical Oxygen Demand (BOD)	mg/L	8.2	6
Colour	Hazen	39.2	18
Dieldrin	µg/L	0	0
Methylene Blue Active Substances (MBAS)	mg/L	0.1	0.2
Nitrogen (Total)	mg/L	6.3	3.7
Oil and Grease	mg/L	7.5	5.1
pH	pH	7.6	7.6
Phosphorus (Total)	mg/L	0.1	0.1
Total Suspended Solids	mg/L	31.3	28.9

No samples were collected at Point 1 during the reporting period

Table 33 provides a summary of Borg's historic annual average water monitoring results for discharge from EPA Point 28. This shows that for the 2023/24 reporting period, the annual average for all pollutants were generally below the concentration limit set in EPL 3035.

Table 33 Annual Average Water Quality Monitoring Results EPA Point 28

Pollutant	Units of Measure	2020/21	2021/22	2022/23	2023/24
Aldrin	µg/L	0	0	<0.01	<0.01
Biochemical Oxygen Demand	mg/L	7.7	5.3	5.8	<2
Colour	Hazen	68.5	31.1	36.0	35
Dieldrin	µg/L	0	0	<0.01	<0.01
Methylene Blue Active Substances	mg/L	0.11	0.2	0.2	<0.1
Nitrogen (Total)	mg/L	8.42	5.7	7.8	1
Oil and Grease	mg/L	5.8	<5	6.0	<5
pH	pH	7.72	7.4	7.6	8.08
Phosphorus (Total)	mg/L	0.09	0.1	0.1	0.02
Total Suspended Solids	mg/L	23.5	63	19.3	<5

One sample was collected and analysed at Point 28 during discharge in the 2023/24 reporting period all other sampling events occurred during times of no discharge and as a precaution.

Four additional samples were analysed from Point 28 during the reporting period that were not included in the table of averages provided. The Four additional samples were taken at times of nil discharge and were taken as a precautionary measure due to heavy rains being forecast. No exceedances were recorded from Point 28 during the reporting period. On average all analysis results were lower than the previous years except for pH which slightly increased.

Table 34 Annual Average Water Quality Monitoring Results HPP Swale Discharge Point

Pollutant	Units of Measure	2021/2022	2022/23	2023/24
Aldrin	µg/L	0	<0.010	<0.010
Biochemical Oxygen Demand	mg/L	3.7	4.2	1.8
Colour	Hazen	57.2	39.1	23.1
Dieldrin	µg/L	0	<0.010	<0.010
Methylene Blue Active Substances	mg/L	0.1	<0.1	<0.1
Nitrogen (Total)	mg/L	1.2	1	0.8
Oil and Grease	mg/L	0	0.8	6.1
pH	pH	7.7	7.6	7.6
Phosphorus (Total)	mg/L	0.06	0.1	0.1
Total Suspended Solids	mg/L	14.6	16.8	8.0

The HPP Discharge Point was not a formally recognised EPA licence discharge location during the reporting period however it was treated the same. Both site discharge points converge approximately 200m downstream of the respective locations. Weekly water samples were undertaken by the Environmental Manger during discharge and analysed off site by a NATA laboratory for the same parameters as indicated in the site EPL. Twenty-one samples (sample event) were collected and analysed at the HPP Discharge Point during discharge in the 2023/24 reporting period. The water that passes through the discharge location consists of stormwater that passes through the HPP site and non-operational StructaFlor site which is adjacent to the Borg facility. The water travels approximately 1.7km through open swales, pipelines, natural water conveying channels containing artificially constructed ERSED controls to filter it. This combination of both natural and artificial filtration has resulted in the low level contaminants at the discharge point over the reporting period, as can be seen in Table 34. The swales were separated back to their original state so that the water can be differentiated between HPP surface water and StructaFlor surface water. The StructaFlor water was rediverted back into Fush 1 stormwater dam and the first separated sampling event was completed on 4 October 2023.

One sample taken from the comingled HPP Swale on 25 July 2023 returned an Oil and Grease result of 38mg/L which exceeds the EPA licence limit at Point 28 of 10mg/L. It was noted on the stormwater recording sheet that the water had moderate discharge and colour appeared light which is similar to previous week. No suspended sediment, water was back to earlier Oil and Grease levels (6mg/L), no Hydrocarbon sheen was visible at sampling location or upstream. Oil and Grease had not previously been an issue in the drainage system. Less than one week after the exceedance event the same discharge point was sampled again and returned a result for Oil and Grease of 6 mg/L. It was also noted that in the week the exceedance occurred, the sample analysis results for Total Recoverable Hydrocarbons with silica gel cleanup were below the detectable reporting level.

The exceedances experienced during this period were investigated in an attempt to determine potential pollutant sources that may have contributed to the exceedances. This included upstream inspections (Council, StructaFlor and HPP stormwater infrastructure), assessment of site activities and ERSED controls, and review of rainfall data from the site weather station. No Hydrocarbon sheen was visible at the sampling location, or upstream and no unusual site activities had been noted during the time.

4.4.1 EPL 3035 Identification Point 28

At EPL discharge Point 28 there were no occurrences where water quality discharge limits for were exceeded.

4.5 Groundwater

In accordance with EPL 3035, Borg monitors four groundwater bores on site. The locations of groundwater monitoring bores are listed in Table 35 and shown on Figure 7.

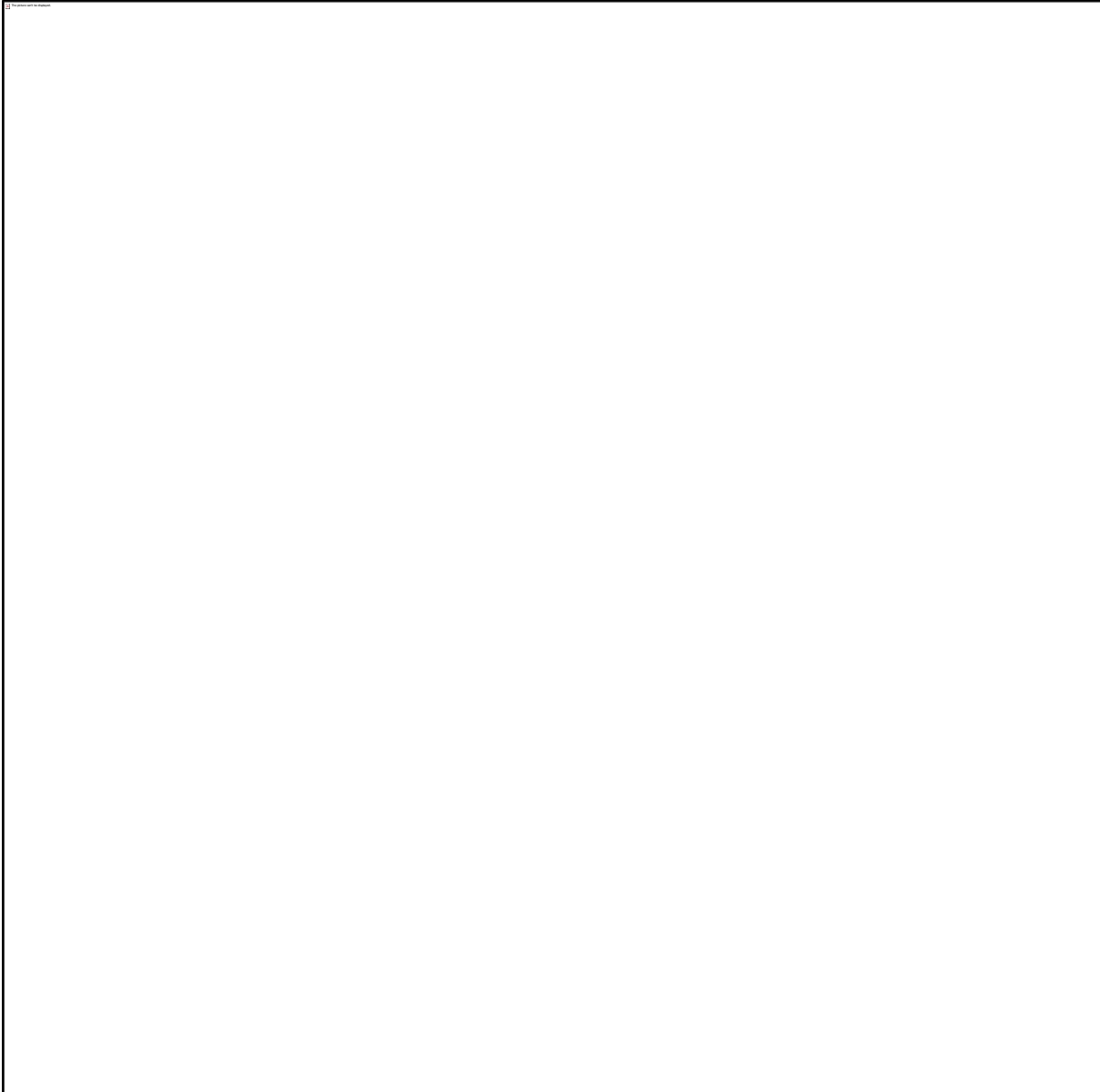
Table 35 Location of Groundwater Monitoring Bores

EPA Identification No.	Location Description
14	North western boundary of site
15	East of stormwater treatment pond
16	East of Woodchem

24	Adjacent northern swale
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Samples were collected by an appropriately qualified third-party specialist and analysed by NATA accredited laboratories in accordance with “Standard Methods for the Examination of Water & Wastewater,” APHA, AWWA, WEF and Water & Wastewater and Examination Manual (V. Dean Adams). Monitoring equipment is maintained in accordance with the manufacturer’s specifications by qualified specialists.

Figure 7 Groundwater Monitoring Locations



Tables 36 - 39 present results for EPA Identification Points 14, 15, 16 and 24 during the reporting period and compares them with the previous three years data. There are no concentration limits for groundwater set in EPL 3035.

Table 36 Groundwater Monitoring Results EPA Identification Point 14 (GW05)*

Pollutant	Unit of Measure	Frequency	2020/21	2021/22	2022/23	2023/24
Aldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Ammonia as N	mg/L	Yearly	0.02	0.04	0.06	0.02
Chemical Oxygen Demand	mg/L	Yearly	25	<10	16	<10
Electrical Conductivity	µS/cm	Yearly	220	323	266	332
Dieldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Formaldehyde	mg/L	Yearly	0.2	<0.1	0.40	<0.1
pH	pH Units	Yearly	6.8	7.7	7.3	7.0
Total Dissolved Solids	mg/L	Yearly	210	244	201	176
Total Organic Carbon	mg/L	Yearly	3	<1	3	<1
Total Petroleum Hydrocarbons	µg/L	Yearly	<50	<50	<50	<50
Total Suspended Solids	mg/L	Yearly	606	26	21	16
Water Height	m	Yearly	1.09	2.21	0.92	1.62

Table 37 Groundwater Monitoring Results EPA Identification Point 15 (GW02)

Pollutant	Unit of Measure	Frequency	2020/21	2021/22	2022/23	2023/24
Aldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Ammonia as N	mg/L	Yearly	<0.01	5.95	4.14	2.62
Chemical Oxygen Demand	mg/L	Yearly	26	23	296	<10
Electrical Conductivity	µS/cm	Yearly	1040	1336	1527	1919
Dieldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Formaldehyde	mg/L	Yearly	0.1	1.10	0.60	<0.1
pH	pH Units	Yearly	7.1	6.7	6.6	6.6
Total Dissolved Solids	mg/L	Yearly	690	982	985	1350
Total Organic Carbon	mg/L	Yearly	3	55	101	79
Total Petroleum Hydrocarbons	µg/L	Yearly	<50	2230	2290.00	1780
Total Suspended Solids	mg/L	Yearly	45	43	55	30
Water Height	m	Yearly	0.98	4.28	4.80	3.45

At EPA Points 14 and 15 (Table 36 and 37), it was reported in the last reporting period that the monitoring well had only recently been reinstated, and that excess sediment may have been deposited. As expected, there were further decreases in TSS over the course of the reporting period. Generally, all analytes were consistent with the previous reporting periods results except electrical conductivity which had a slight increase and a notable decrease of Total Petroleum Hydrocarbons at Point 15.

Table 38 Groundwater Monitoring Results EPA Identification Point 16 (GW01)

Pollutant	Unit of Measure	Frequency	2020/21	2021/22	2022/23	2023/24
Aldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Ammonia as N	mg/L	Yearly	0	0.03	0.06	0.08
Chemical Oxygen Demand	mg/L	Yearly	26	28	26	37
Electrical Conductivity	µS/cm	Yearly	257	282	250	283
Dieldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Formaldehyde	mg/L	Yearly	0.3	<0.2	4.60	<0.1
pH	pH Units	Yearly	6.3	6.9	6.8	6.4
Total Dissolved Solids	mg/L	Yearly	200	168	176	132
Total Organic Carbon	mg/L	Yearly	6	8	4	6
Total Petroleum Hydrocarbons	µg/L	Yearly	<50	<50	<50	<50
Total Suspended Solids	mg/L	Yearly	173	197	54	152
Water Height	m	Yearly	0.86	2.02	2.34	2.20

Generally, all analytes displayed in Table 38 at Point 16 were consistent with the previous reporting periods results except for a notable decrease in formaldehyde.

Table 39 Groundwater Monitoring Results EPA Identification Point 24 (GW03)

Pollutant	Unit of Measure	Frequency	2020/21	2021/22	2022/23	2023/24
Aldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Ammonia as N	mg/L	Yearly	<0.01	1.12	0.09	0.02
Chemical Oxygen Demand	mg/L	Yearly	182	37	28	<10
Electrical Conductivity	µS/cm	Yearly	421	428	374	45
Dieldrin	µg/L	Yearly	<0.5	<0.5	<0.5	<0.5
Formaldehyde	mg/L	Yearly	0.1	0.1	<0.1	<0.1
pH	pH Units	Yearly	7.3	7.2	6.7	6.8
Total Dissolved Solids	mg/L	Yearly	264	397	340	280
Total Organic Carbon	mg/L	Yearly	148	3	4	4
Total Petroleum Hydrocarbons	µg/L	Yearly	<50	<50	<50	<50
Total Suspended Solids	mg/L	Yearly	142	23	19	11
Water Height	m	Yearly	5.89	6.5	3.0	2.30

Generally, the analytes displayed in Table 39 at Point 24 have decreased in comparison to the previous year's reporting period. A notable decrease in Chemical Oxygen Demand and Electrical Conductivity is evident when compared with the last reporting period.

4.6 Noise

In accordance with EPL 3035 and site management plans, Borg monitors noise emissions from the facility. Noise from the premises must not exceed the limits noted in Table 44. In accordance with Development Consent SSD 7016 all construction activities related to Borg must also comply with the limits in Table 40.

Table 40 Noise Limits dB(A)

Location	Day L_{Aeq}(15 minute)	Evening L_{Aeq}(15 minute)	Night L_{Aeq}(15 minute)
All sensitive receivers	55	50	45
Note: <i>Day</i> – The period from 7:00am to 6:00pm on Monday to Saturday, and 8:00am to 6:00pm on Sundays and Public Holidays <i>Evening</i> – The period from 6:00pm to 10:00pm <i>Night</i> – The period from 10:00pm to 7:00am on Monday to Saturday, and 10:00pm to 8:00am on Sundays and Public Holidays L _{Aeq} means the equivalent continuous noise level – the level of noise equivalent the energy-average of noise levels occurring over a measurement period.			

These noise limits apply under all meteorological conditions except for the following:

- Wind speeds greater than 3 meters/second at 10 metres above ground level; or
- Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or
- Stability category G temperature inversion conditions.

Data recorded by the site meteorological station identified as EPA Identification Point 26 is used to determine meteorological conditions. Temperature inversion conditions (stability category) are to be determined by the sigma-thetas method referred to in Fact Sheet D in the *Noise policy for Industry EPA 2017*.

4.6.1 Operational Noise

EPL 3035 stipulates that noise monitoring to determine compliance must be carried out at least once annually during the day, evening and night-time hours specified in Table 40. Noise monitoring must be undertaken in accordance with *Australian Standard AS 2659.1 (1998): Guide to use of sound measuring equipment – portable sound level meters*, and the compliance monitoring guidance provided in the *NSW Noise Policy for Industry (EPA 2017)*.

During the 2023/24 reporting period, Global Acoustics were engaged to conduct attended noise monitoring and provide an *Annual Noise Monitoring Report* for operational noise generated by the Development. The noise monitoring event was conducted at four sensitive receiver locations as shown in Figure 8 on 20th June 2023. Table 41 presents results of the attended annual noise monitoring event.

Figure 8 Borg’s noise monitoring locations

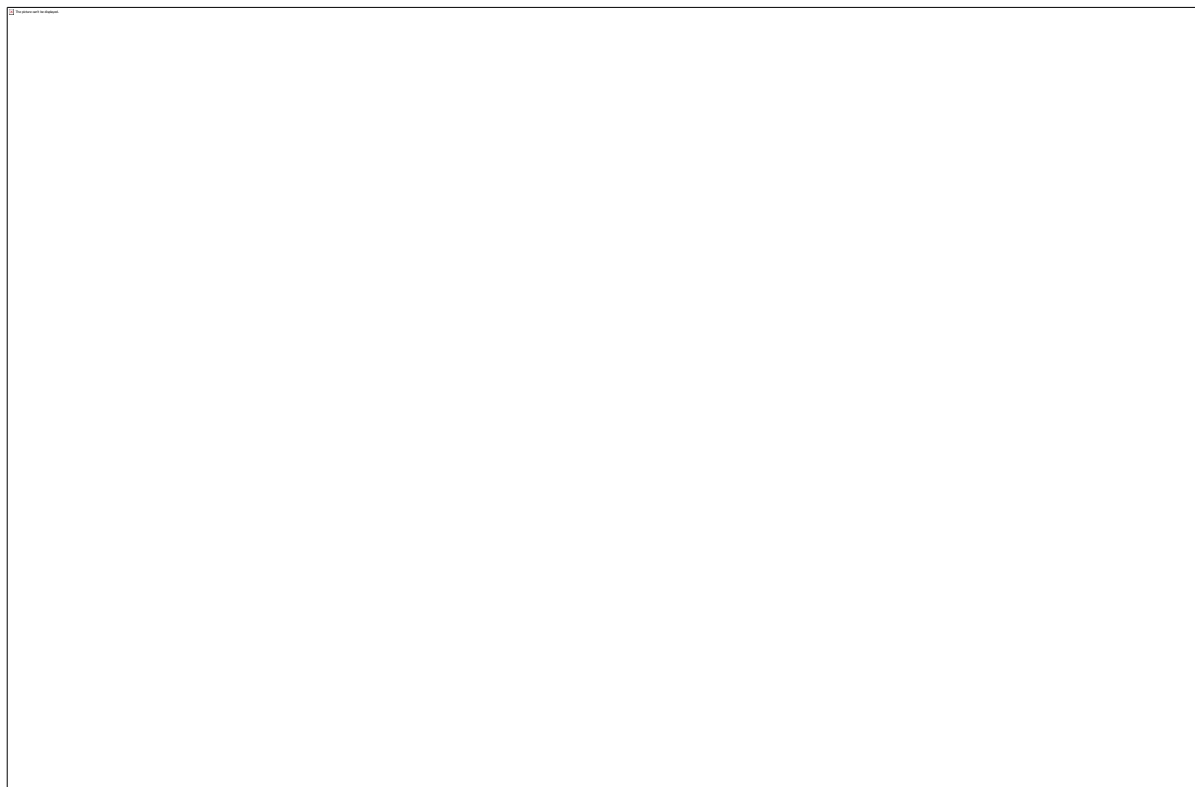


Table 41 Attended Noise Monitoring L_{Aeq} (15 minute)

Location	Start Date and time	Wind Speed m/s	Stability Class	Criterion dB	Criterion Applies ^{2, 3}	Borg LAeq 15 min dB ⁴	Exceedance 5,6
NM1	20/6/2023 13:20	3.4	C	55	No	42	NA
NM2	20/6/2023 13:40	3.3	C	55	No	NM	NA
NM3	20/6/2023 14:04	3.2	B	55	No	NM	NA
NM4	20/6/2023 14:25	3.3	A	55	No	NM	NA
NM1	20/6/2023 20:03	0.8	F	50	Yes	36	Nil
NM2	20/6/2023 20:24	0.6	F	50	Yes	37	Nil
NM3	20/6/2023 20:48	1	E	50	Yes	44	Nil
NM4	20/6/2023 21:12	1.8	E	50	Yes	IA	Nil
NM1	20/6/2023 22:06	1.3	E	45	Yes	42	Nil
NM2	20/6/2023 22:26	0.7	F	45	Yes	37	Nil
NM3	20/6/2023 22:49	0.5	F	45	Yes	41	Nil
NM4	20/6/2023 23:12	0.4	F	45	Yes	41	Nil

NA = Not Applicable means atmospheric conditions outside conditions specified in Development.

NM = Not Measurable means some noise from the source of interest was audible at low levels but could not be quantified.

IA = Inaudible means there was no noise from the source of interest audible at the monitoring location.

1. Atmospheric data is sourced from Borg's weather station in Oberon;
2. In accordance with EPL and PA, the noise criteria are to apply under all meteorological conditions except the following:
 - Wind speeds greater than 3 m/s at 10 metres above ground level; or
 - Stability class F temperature inversion conditions, and wind speeds greater than 2 m/s at 10 metres above ground level; or
 - Stability class G temperature inversion conditions.
3. Criterion may or may not apply due to rounding of meteorological data values;
4. Estimated or measured LAeq, 15 minute attributed to Borg;
5. Bold results in red indicate exceedance of criteria (if applicable); and
6. NA in exceedance column means atmospheric conditions outside conditions specified in development consent and so criterion is not applicable

The attended noise monitoring conducted by EMM (Formally Global Acoustics) recorded no exceedance of the limits identified in Table 40. All measurements were undertaken as per the *Noise policy for Industry EPA 2017*.

4.6.2 Construction Noise

Borg's Construction Noise Management Plan (CNMP) includes an attended monitoring regime of one event per quarter. Quarterly noise monitoring is not a compliance requirement under EPL 3035 however it is included as a commitment in Borg's Construction Noise Management Plan and therefore, a requirement of SSD 7016 condition C3.

Attended monitoring locations are shown in Figure 8. If any exceedances are identified, additional mitigation measures are implemented, and follow-up monitoring undertaken within one week of the exceedance to determine the effectiveness of the additional controls. Global Acoustics conducted the construction noise monitoring for this review period. Tables 42 to 45 show monitoring results for quarterly noise monitoring events. All reference notes are included below Table 45.

Table 42 Construction Noise Quarter 2

Location	Start Date and time	Wind Speed m/s	Stability Class	Criterion dB	Criterion Applies ^{2, 3}	Borg LAeq 15 min dB ⁴	Exceedance 5,6
NM1	20/6/2023 13:20	3.4	C	55	No	42	NA
NM2	20/6/2023 13:40	3.3	C	55	No	NM	NA
NM3	20/6/2023 14:04	3.2	B	55	No	NM	NA
NM4	20/6/2023 14:25	3.3	A	55	No	NM	NA
NM1	20/6/2023 20:03	0.8	F	50	Yes	36	Nil
NM2	20/6/2023 20:24	0.6	F	50	Yes	37	Nil
NM3	20/6/2023 20:48	1	E	50	Yes	44	Nil
NM4	20/6/2023 21:12	1.8	E	50	Yes	IA	Nil
NM1	20/6/2023 22:06	1.3	E	45	Yes	42	Nil
NM2	20/6/2023 22:26	0.7	F	45	Yes	37	Nil
NM3	20/6/2023 22:49	0.5	F	45	Yes	41	Nil

NM4	20/6/2023 23:12	0.4	F	45	Yes	41	Nil
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Table 43 Construction Noise Quarter 3

Location	Start Date and time	Wind Speed m/s	Stability Class	Criterion dB	Criterion Applies ^{2,3}	Borg LAeq 15 min dB ⁴	Exceedance 5,6
NM1	3/08/2023 10:11	4.5	D	55	No	49	NA
NM2	3/08/2023 10:35	4.5	A	55	No	NM	NA
NM3	3/08/2023 9:18	3.1	C	55	No	46	NA
NM4	3/08/2023 9:47	4.2	D	55	No	47	NA

Table 44 Construction Noise Quarter 4

Location	Start Date and time	Wind Speed m/s	Stability Class	Criterion dB	Criterion Applies ¹	Borg LAeq(15 min) ²	Exceedance e ^{3,4}
NM1	2/11/2023 11:38	2.5	A	55	Yes	46	Nil
NM2	2/11/2023 12:00	1.8	A	55	Yes	36	Nil
NM3	2/11/2023 10:50	2.3	A	55	Yes	36	Nil
NM4	2/11/2023 11:15	1.7	A	55	Yes	37	Nil

Table 45 Construction Noise Quarter 1

Location	Start Date and time	Wind Speed m/s	Stability Class	Criterion dB	Criterion Applies ¹	Borg LAeq(15 min) ²	Exceedance e ^{3,4}
NM1	19/03/2024 13:32	2.9	A	55	Yes	47	Nil
NM2	19/03/2024 13:54	2.5	A	55	Yes	NM	Nil
NM3	19/03/2024 12:45	3.7	A	55	No	38	NA
NM4	19/03/2024 13:10	2.5	A	55	Yes	40	Nil

NA = Not Applicable means atmospheric conditions outside conditions specified in Development Consent and so criterion is not applicable.

NM = Not Measurable means some noise from the source of interest was audible at low levels but could not be quantified.

IA = Inaudible, there was no noise from the source of interest audible at the monitoring location.

1. Noise criteria are to apply under all meteorological conditions except the following:

- Wind speeds greater than 3 m/s at 10 metres above ground level; or
- Stability class F temperature inversion conditions, and wind speeds greater than 2 m/s at 10 metres above ground level; or
- Stability class G temperature inversion conditions.

2. Site-only LAeq, 15minute attributed to the Development, including modifying factors if applicable;

3. Bold results in red indicate exceedance of criteria (if applicable); and

4. NA in exceedance column means atmospheric conditions outside conditions specified and criterion is not applicable.

No exceedances of EPL 3035 noise limits were recorded during these monitoring events.

5 Community Relations

5.1 Environmental Complaints

Eleven community complaints were received during the 2023/24 reporting period. Site investigations were conducted by the Environmental Manager and team leaders which included a review of plant operational data, noise monitoring and visual inspections. Discussions were conducted with Area Managers/Supervisors regarding site activities to determine if the facility was operating within approved conditions as specified in SSD 7016 and EPL 3035 at the time of the complaints.

2 AIR, 1 ODOUR, 8 NOISE, TOTAL OF 11

Two fibre complaints were made by one resident in Oberon and discussions have been ongoing. The resident has been communicating with Borg about debris being found on his car on occasion. During a phone call the Borg Environmental Manager informed the resident that we were commencing significant works on C1 cyclones very shortly. We had conducted significant investigations into potential sources and were reviewing the details regularly, however our geographically placed wind rose data did not align with the thought that it could have been from the C1 cyclones. Conversations around the sites EPA licence and emissions data have also been conducted.

One complaint was received by a contract worker who was working outside and there seemed to be a lot of steam and odour coming from the site. Caller believed there was a strong formaldehyde smell. Environmental Manager confirmed that the plant was operating under normal conditions. Investigated multiple areas surrounding the site and conducted Formaldehyde monitoring with all results being below the detectable limit of the Faradmeter which is 0.02ppm.

Eight complaints received during this reporting period were related to noise from one resident. The complainant also made multiple complaints in the previous reporting periods, all of which were investigated, and no breaches were identified. This reporting period the complainant had become quite persistent with complaints calling, sometimes twice a week. The complainant had given very little to no detail leaving messages for the complaints line such as "Loud noise coming from Albion Street. Woke me up this morning" and "Has been going for hours and has been getting worse, could not tell you what it sounds like, but it is from Borg." The complainant became very difficult to work with in the last reporting period, this did not improve during this reporting period. They did not answer or return phone calls and so following up these complaints became quite difficult. A specific project was commissioned which included spot noise checks in various locations throughout the town surrounding the site, noise monitoring and mapping of the surrounding area helped to provide insight into any unsubstantiated illegitimate complaints.

External noise monitoring was completed by EMM (Formally Global Acoustics) quarterly within the reporting period with no evidence of breaches identified. It was reported by neighbouring business Woodchem that they had undertaken investigations into noise sources on site around June/ July 2023 and some work was completed on air valves and controls in the following months. The work was successful and minimised noise emissions further below the already compliant limits. Following the work that Woodchem had completed in August, Borg has not received any further noise complaints.

For each complaint received, Borg provided a response to the complainant in a timely manner. With respect to noise complaints, regardless of our demonstration of compliance with noise limits via compliance noise monitoring events, Borg will continue to undertake ad hoc attended and unattended noise monitoring to ensure nil noise nuisance to local residents from site activities.

5.2 Community Liaison

5.2.1 Community Consultative Committee (CCC)

Borg has an established joint Community Consultative Committee (CCC) that meets nominally quarterly to discuss environmental and operational aspects of the facility, and the greater Oberon Timber Complex (OTC). The CCC meetings provide a forum to discuss and address general construction and operational impacts, and mitigation measures for Borg. The CCC meetings also allow for feedback from the local community to Borg and the OTC in relation to environmental performance.

Borg hosted two CCC meetings during the reporting period on the 17th of August 2023, and 27th March 2024. All meetings were held in the boardroom of the administration building at the Development where members of the community, local council, the Mayor and neighbouring businesses (Highland Pine Products and Woodchem) attended and contributed. Some community members also joined online via video call on Teams.

The major discussion points relating to the Development in 2023/24 were as follows:

- Hot line complaints – line not working effectively. Gatehouse 3 answers the hot line as “gate 3” and people hang up as they do not think it is the Hot line. Need to look at ways to register or receipt of hot line messages at the gate.
- Conti 1 cyclones repair/construction is underway and will be operational around December 23.
- Wastewood – Water curtains installed around UWR to capture dust and particles with the increase in recycled wood.
- Community Hot line issues improving and are now being directed to Andrew Brady.
- Mid last year was the last noise complaint.
- Third Party monitoring, all good around sites outside.
- Dust – Cyclone upgrades have helped, one resident dust complaint on going.
- Dryer upgrade is now completed on C1 with new cyclone tops replacing the existing ones.
- Harvesting a lot more storm water this year meaning less discharge
- On average 73% UWR recycled wood was used in the Particle Board product. We’re heading towards 18,000-19,000 tonnes per month with the Particle Board output having increased by 15%.

5.2.3 Opportunities for Information Exchange

Borg established the following avenues to record enquiries and complaints related to construction and operational activities:

- A 24-hour free call community liaison line (1800 802 795)
- Postal address for written complaints (Borg Panels, Private Mail Bag 1, Oberon NSW 2787)
- Email address for electronic complaints (oberon_site@borgs.com.au)

The telephone number, postal and email address are displayed on a sign at the entrance to the Development in a position that is clearly visible to the public. This information is also distributed to the local community and is included in public information communications which may include Borg website, local area advertisements, letterbox notifications and project fact sheets.

6 Independent Audit

Development Consent SSD 7016 condition C15 sets out requirements for independent environmental audits of the Development. Borg commissioned environmental consultants Molino Stewart to conduct an Independent Environmental Audit (IEA) of the site for operations and construction for audit period 1 July 2018 to 29 May 2021. In accordance with SSD 7016 condition C15 the next IEA is scheduled for 2024 and will be submitted after this reporting period.

7 Environmental Incidents & Non-compliances

Environmental incidents are managed through Borg Pollution Incident Response Management Plan (PIRMP) and are logged in DataStation, Borg's incident management system. Each incident report details the issue, the corrective and preventative actions taken, and the responsibilities and timing for completion of the actions. The report also includes any additional comments relevant to the incident and the completion date of corrective actions.

7.1 Incidents

A pollution incident that requires notification is defined in section 147 of the Protection of the Environment Operations Act 1997 as:

- (a) Harm to the environment is material if:
 - i. It involves actual or potential harm to the health or safety of human beings or the ecosystems that is not trivial, or
 - ii. If results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations),
and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

During this reporting period, there were three reportable environmental pollution incidents at Borg.

7.2 Non-conformances

On 7 November 2023 Borg reported an incident to the EPA's Environment Line. The incident comprised the release of wood fibre from the Conti 4 cyclone. The Environmental and Safety Manager and Facility Manager identified no widely dispersed debris on or adjacent the roads surrounding the plant (Lowe's Mount Road, Albion St, North St, Dart St, Ross St, Horace St, Oberon St). Minor quantities of debris was observed in a very specific area of Scotia Avenue approximately 1km from C4, Carrington Avenue approximately 1.2km from C4 and Balfour Street approximately 1.3km from C4. No fibre was identified on any other surfaces or the road surrounding the site. No formal complaints were made about the fibre event either directly to Facility staff or the 24-hour complaints line and no further sightings were recorded by residents or business owners to the business.

The decision was made to take Conti 4 offline until the above works and a full investigation was completed, and suitable modifications were enacted. The line was not put back into operation until approximately 9:00pm the following day (8/11/2023). On 29 November 2023 Borg provided the EPA with an incident report in accordance with EPL 3035 condition R3.

On 19 March 2024 Borg reported a second incident to the EPA's Environment Line. The incident comprised the release of wood fibre from the Conti 4 cyclone to the nearby receiving community at approximately 17:45pm. Management believed that the clean-up was adequate at approximately 10:00pm and decided that further off-site investigations would be best undertaken with daylight the following morning. The following morning Wednesday 20 March 2024 the Environmental and Safety Manager conducted another off-site assessment on the roads previously identified and determined that there were no further impacts that needed rectification. Communication continued with the public-school principal after the event to ensure any questions or complaints could be resolved. The principal was satisfied with the cleanup works and said that no complaints had been received by students, teachers, or parents regarding the incident.

Following the incident, Borg Facility Manager and the Environmental and Safety Manager met with the General Manager of Oberon Council Gary Wallace and Planning and Development Director Damian O'Shannassy to debrief and have an open discussion. The Environmental and Safety Manager informed the council members that Borg was going to hold a Community Consultative Committee Meeting the following week on 27 March 2024 to inform and debrief with members of the community as well as neighboring businesses. It was suggested by Council to request an extraordinary Local Emergency Management Committee (LEMC). This was requested by The Environmental and Safety Manager and the meeting was held on Thursday 4 April 2024.

An R3 report was submitted to the EPA in relation to the incident.

On 26 March 2024, air emissions specialists EKTIMO Pty Ltd conducted Borg's annual compliance monitoring. Air monitoring was conducted at the Particleboard Press Extraction System EPA Point 31 for Total Solid Particles (TSP), Nitrogen Oxides (NOx) and Metals: Type 1 substances (Sb, As, Cd, Pb, Hg) & type 2 substances (Be, Cr, Co, Mn, Ni, Se, Sn, V). A report was provided by EKTIMO on 26 April 2024.

All emission results were below the adopted thresholds governed by EPL 3035 with the exception of Total Particulate Matter (TPM). The license stipulates a 100 Percentile concentration limit of 50 milligrams per cubic metre for EPA Point 31. The detected value at the time of monitoring was 72 milligrams per cubic metre. Upon receipt of the result the following actions were undertaken:

1. Notification made to the EPA.
2. Completed a precautionary drain and clean of the Press Extraction System
3. Scheduling of an additional test for Point 31.
 - a. EKTIMO were unable to attend for a retest until the 4 June 2024. Booked in the retest and then enquired with additional companies.
 - b. Assured Environmental were approached and attended site on 22 May 2024 for TPM testing.

Assured Environmental attended site on 22 May 2024 to conduct TPM testing of EPA Point 31. Two tests were performed during the day for at the discharge point and returned results of **5.7mg/m³** and **6.6mg/m³** respectively.

EKTIMO attended site on 4 June 2024 to conduct further TPM testing of EPA Point 31. Whilst the report has not been finalised for the testing a verbal result of **<9 mg/m³** has been provided by EKTIMO on 14 June 2024.

8 Activities Proposed for the next Annual Review Period

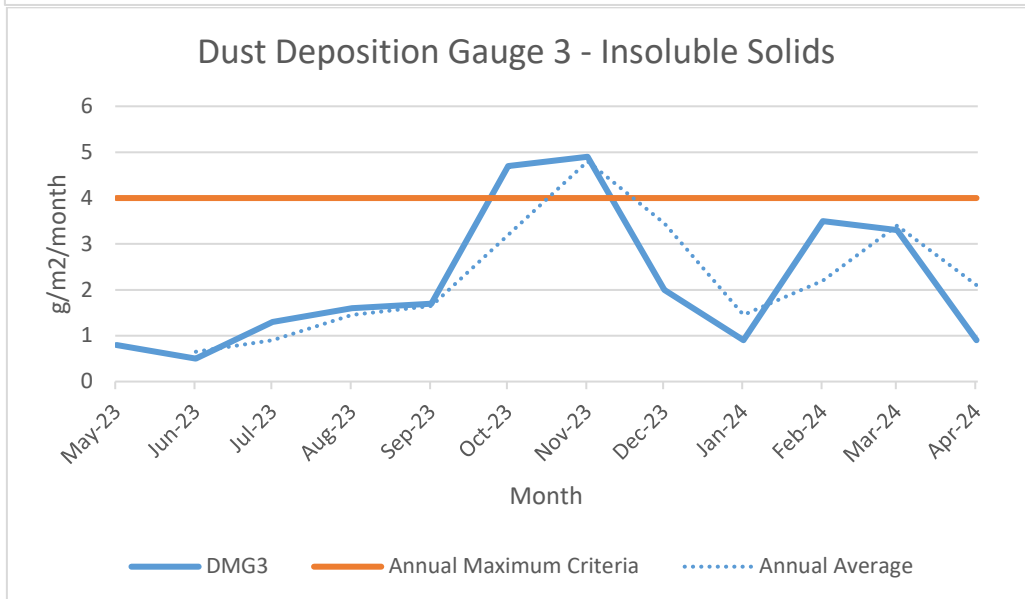
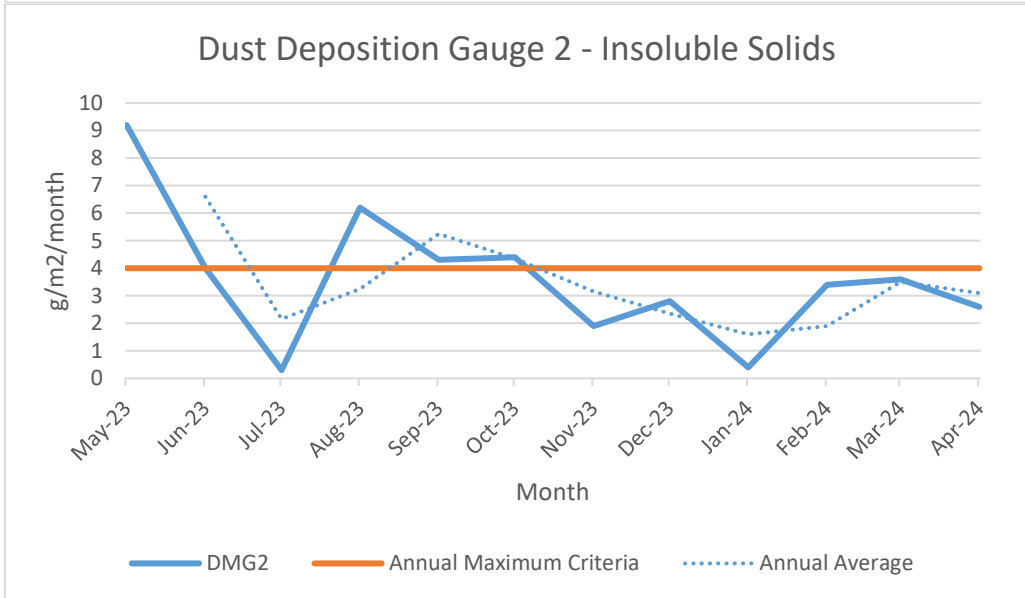
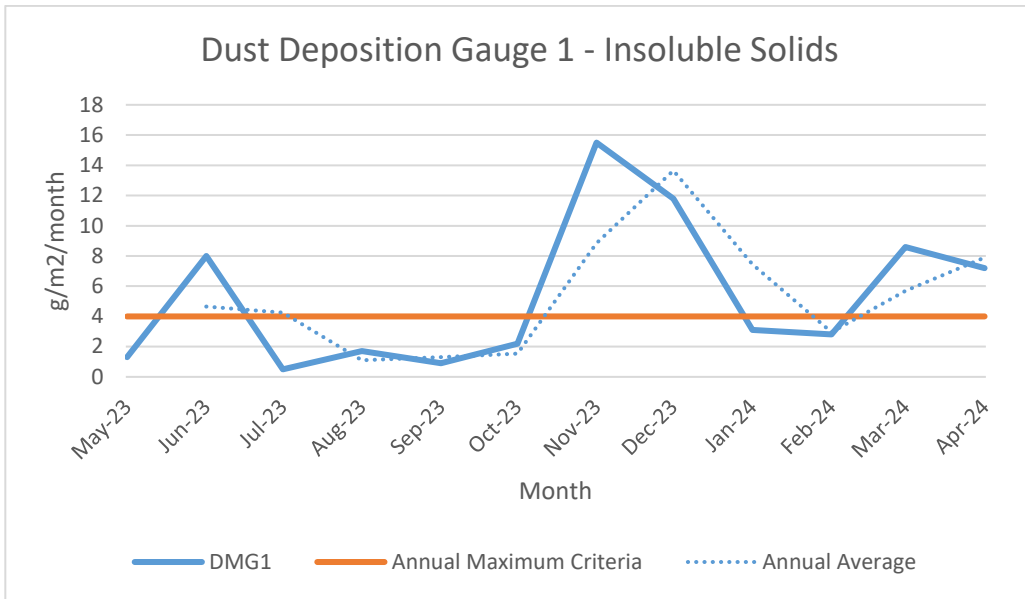
Borg will endeavour to carry out the activities listed in Table 46 during the 2024/25 reporting period to assist with improving the environmental performance of the existing development and the project.

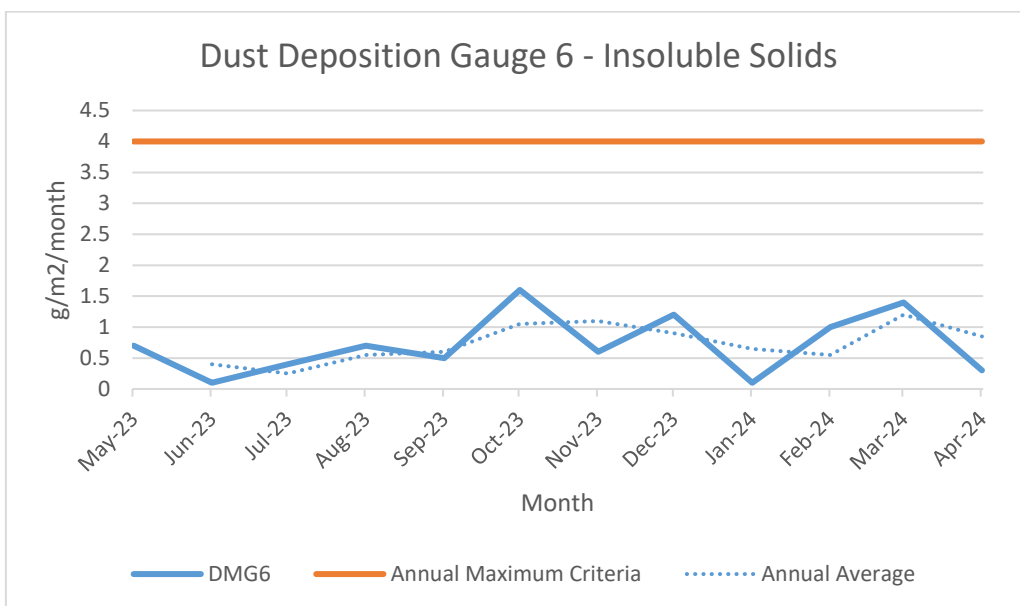
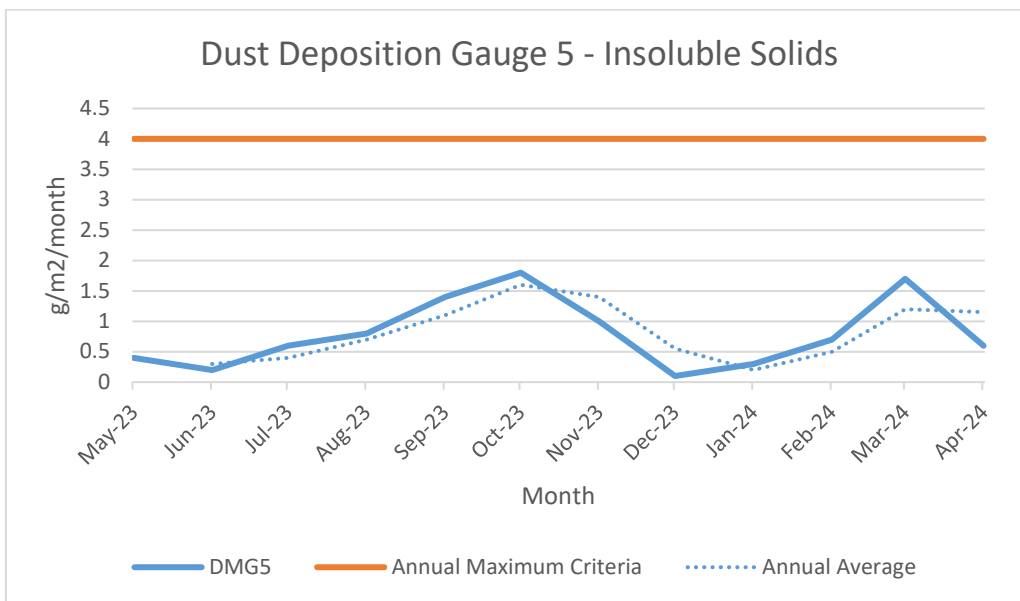
Table 46 Proposed Activities for 2024/25 Reporting Period

Ongoing implementation of Environmental Management Plans for the existing development and the project.
Complete verification studies required for SSD 7016 including modifications
Commence hazard audit under DPIE Hazardous Industry Planning Advisory Paper No. 5 -Hazard Audit Guidelines (HIPAP 5 – Ref. 2) (four yearly)
Complete Conti 4 commissioning and associated commissioning and verification reports and license variation
Complete works as approved under Modification 4 & commence works under Mod 5
Continue erosion and sediment control inspections and rectification works as necessary to manage storm water quality discharge
Carry out independent environmental audit (IEA) as per condition C15

APPENDICIES

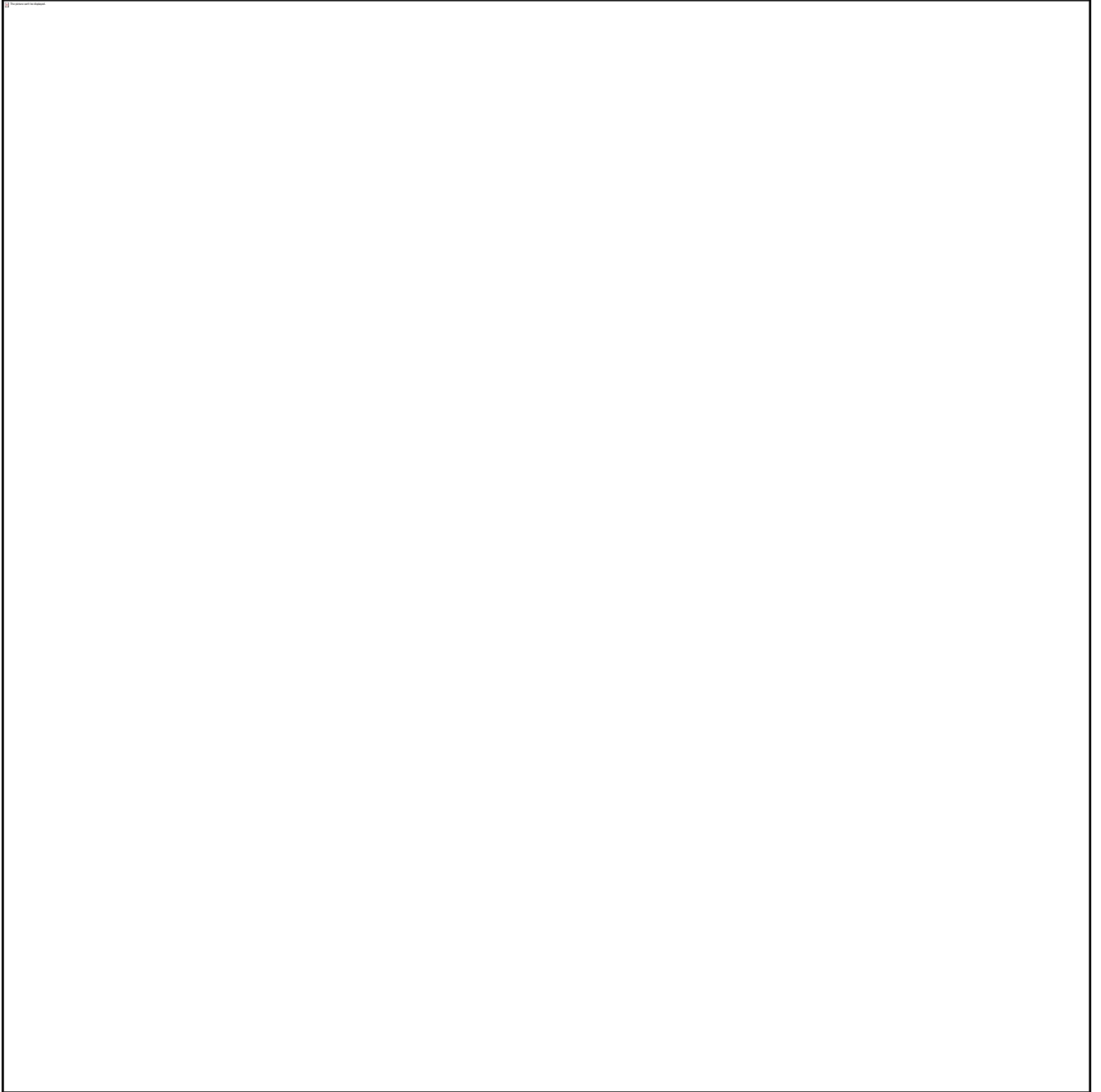
Appendix A – Depositional Dust Monitoring Data





Appendix B – Surface Water Monitoring Data





Appendix C – Community Complaints

Complaint No	Category	Date Received	Property	Detail	Follow Up Actions
135	Noise	5/5/2023	Dart Street, Oberon	"Reporting noise along Albion Street this morning."	Continued monitoring plant operating conditions.
136	Noise	12/5/2023	Dart Street, Oberon	"Loud noise coming from Albion Street. woke me up this morning."	Monitor plant operating conditions and ensure plant is continuing to comply with license requirements.
137	Noise	2/6/2023	Dart Street, Oberon	"Loud noise banging from Borg."	Reviewed camera footage and plant operating conditions reminded departments about noise requirements for the site.
138	Noise	17/6/2023	Dart Street, Oberon	"All night noise from 7pm along Albion Street and getting worse."	Review operating conditions and weather data. Ensure all roller doors are shut and license requirements are still being met.
140	Noise	26/7/2023	Dart Street, Oberon	"Report Borg noise, all night and now it is just noise, noise, noise."	Review plant operating conditions and review noise logger data. to ensure plant is continuing to operate within license limits.
141	Noise	27/7/2024	Dart Street, Oberon	"Noise from Borg constant since 12:30am."	Check plant operating condition. Ensure that the license requirements are continuing to be met.
142	Noise	22/8/2024	Dart Street, Oberon	"Has been going for hours and has been getting worse. could not tell you what it sounds like, but it is from Borg."	Continue to investigate potential noise impacts in town even though third-party compliance monitoring has been conducted and the site is within compliance.
143	Dust/Debris	20/9/2023	Tasman Street, Oberon	Discuss ongoing concerns from community member. resident has been communicating with us about debris being found on his car on occasions. On this phone call I informed him that we are commencing significant works on C1 cyclones very shortly. We have conducted significant investigations into potential sources and are reviewing the details regularly, however our geographically placed wind rose data doesn't align with the thought that it could be from C1 cyclone.	Advise Peter when C1 works commence. Peter to monitor any changes to debris deposition.

Annual Review 2023/24 – Borg Manufacturing, Oberon

144	Odour	3/11/2023	Lowes Mount Road, Oberon	Working outside and there seemed to be a lot of steam and odour coming from the site. Caller believed there was a strong formaldehyde smell.	Confirmed that the plant was operating under normal conditions. Investigated multiple areas surrounding the site and conducted Formaldehyde monitoring. No evidence of breach found.
145	Dust/Debris	5/2/2024	Tasman Street, Oberon	Resident identified fibre fall out on vehicle soon after washing it.	Reviewed operating conditions.