Highland Pine Products Pty Ltd

ANNUAL ENVIRONMENTAL MANAGEMENT REPORT

2021

PREPARED BY

Spiro Kavalieros
EHSR Group Pty Ltd

March 2022

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APPENDICES

Section 1.0 Title Block

Name of operation	Highland Pine Products (HPP)
Name of operator	Highland Pine Products Pty Limited
Development consent / environmental license #	DA 403-11-00 (Dept. of Planning) / EPL 11229 (EPA environmental Consent)
Name of holder of development consent / project approval	Highland Pine Products Pty Limited
Annual review start date	1 January 2021
Annual review end date	31 December 2021
Annual return start date	13 August 2020
Annual return end date	12 August 2021
I, Mike Bitzer, certify that this report is a true and accurate record of the compliance status of Highland Pine Products for the period as noted above and provide this detail on behalf of Highland Pine Products Pty Limited.	
Name of authorised reporting officer	Mike Bitzer
Title of authorised reporting officer	General Manager Highland Pine Products
Signature of authorised reporting officer **Date 29/3/22**	

Section 2.0 Statement of Compliance

Were all relevant operational conditions of approvals complied with during the reporting period?	
Consent	**Yes/No**
EPL 11229 (EPA environmental Consent)	Yes
DA 403-11-00 (Dept of Planning DA)	No

2.1 NON-COMPLIANT OPERATIONAL CONDITIONS

Report by Envirorisk Pty Ltd – October 2021

"The audit found that the site is substantially compliant with the pollution control andamenity conditions of the DC and EPL" "Using a subjective 1-5 scale rating system for each objective, the audit has found that thesite has achieved an overall environmental performance score of 87%" The EnviroRisk report is attached in full as **Appendix J.**

No.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY[1]	HPP RESPONSE	DUE DATE
DA 403-11-00					
DC:21-1	HPP pursue modification of existing planning consent conditions that are no longer applicable as part of a planning permit application for future proposed works at the facility.	DC 1.10	High	Noted – HPP will engage with DPE on a process for the potential modification or replacement of current DA.	Q1 2022
DC:21-2	During the next EMP update, review the references section to ensure it specifiesrelevant Acts and Regulations applicable to the site.	DC 3.3(b)	Low	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-3	Update the References list in the EMP to include: ▪ Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018; ▪ Protection of the Environment Operations Act 1997; ▪ Protection of the Environment Operations (Clean Air) Regulation 2021; ▪ Approved methods for the modelling and assessment of air pollutants in NSW2016; ▪ NSW EPA, Approved methods for the sampling and analysis of air pollutants inNew South Wales 2006; and ▪ Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme(3rd edition) 2017	DC 3.3(b)	Low	As above.	
DC:21-4	Update the EMP to include specific units of measurement (consistent with EPL 11229) within the Groundwater Environmental Monitoring Requirements	DC 3.3(c)	Low	Completed in the 2021 review of EMP.	complete
DC:21-5	Update the EMP to include the current version of EPL 11229	DC 3.3(c)	Low	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-6	Undertake annual update of the onsite Community Complaint Logbook.	DC 3.3(e)	Low	Complete	Nov 2021
DC:21-7	Update the EMP to reference or link to site safety systems.	DC 3.3(e)	Low	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022

No.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY[1]	HPP RESPONSE	DUE DATE
DC:21-8	Update the EMP to either remove references to the 'Environmental Manager', 'Area leader' and 'Site Gate Security' if these positions do not exist, or, if the positions do exist to define the roles and responsibilities of the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' and any other roles described in the EMP.	DC 3.3(f)	Low	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-9	Issue a copy of the current EMP to Oberon Council.	DC 3.4	High	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-10	Update the EMP to provide a consistent requirement for review frequency.	DC 3.5	Low	Complete	Nov 2021
DC:21-11	As part of recommendation DC21-1 above seek to have specified noise measurement criteria in the DA aligned with criteria specified in EPL 11229. If this cannot be achieved, develop and implement noise attenuation strategies to bring measured noise from the HPP facility within the DA-403-11-00 specified measurement criteria of'41 LA10 15min dB for the night period.	DC 4.1	High	Noted – HPP will engage with DPE on a process for the potential modification or replacement of current DA.	Q1 2022
DC:21-12	Replace the damaged rubber curtain at the Drymill re-entry sticker conveyor tocontribute to noise attenuation from this area.	DC 4.3	Low	Complete	Nov 2021
DC:21-13	Ensure that all boiler fuel wood and timber product is stored inside the bin to reduceimpact into adjacent stormwater system.	DC 4.4	Low	Noted. Currently altering SOP to improve control in this area.	Q2 2021
DC:21-14	Place additional signage at Gates 2 and 3 advising that all trucks transporting residuesare to be tarped before leaving the site.	DC 4.6	Low	Signs currently being ordered and will be installed upon arrival.	Q2 2022
DC:21-15	Seek consultation from the Oberon Council on the current version of the StormwaterManagement Plan.	DC 4.9	High	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-16	Seek DPE approval of the current version of the Waste Management Plan.	DC 4.12	High	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-17	Seek DPE approval of the current version of the Landscape Management Plan.	DC 4.20	High	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022
DC:21-18	Include in monitoring results tables in the AEMR's the criteria against which monitoring parameters are assessed (i.e. 250 mg/m3 for Total Solid Particles (TSP)and 2500 mg/m3 for NOx).	DC 5.1(d)	Low	Complete	Jan 2022
EPL 11229					
EPL:21-1	Engage a contractor as soon as reasonably practicable to clean out the gross pollutanttraps and empty the overtopping oil container at the fuel station.	EPL L1.2	Medium	Completed December 2021.	Dec 2021
EPL:21-2	Improve plant design compliance with the ANZS 2843.1 Standard including: a) Part 1Section 2.4 Water Bodies: Install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps.	EPL O4.1	Medium	Noted. Currently seeking quotes for the installation of a GW monitoring bore down gradient of the treatment and batching plant.	Q1 2022
ENVIRONMENTAL SYSTEM IMPROVEMENTS					

No.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY[1]	HPP RESPONSE	DUE DATE
EMS:21-1	Add HAZCHEM signs to all entry points as per the regulations so that they are clearlyvisible.	-	Low	Signs ordered and on-site. Awaiting installation.	Q2 2022
EMS:21-2	PIRMP signage be secured to wall for easy access.	-	Low	Signs purchased – task underway	Q1 2022
EMS:21-3	Arrange for drums to be removed from the empty drum storage as soon as COVIDlockdown lifts. Also add signage at the drum storage area that all drums must be stored within the bund.	-	Medium	Completed	Nov 2021
EMS:21-4	Relocate bulk ink containers in the Drymill to be stored in a bunded area	-	Medium	Completed	Nov 2021
EMS:21-5	Improve the labelling on greaser lube containers in the Green Mill to include pictograms and hazard classifications.	-	Medium	Ongoing. Process in place to complete labeling of decanted product.	Ongoing
EMS:21-6	Add into the preventative maintenance system (MEX) the maintenance of the diesel bulk storage tank, bund pump, alarm system and plate separator.	-	Low	Several additional MEX tasks will be added to program during the xmas shut.	Q2 2022
EMS:21-7	Add into the preventative maintenance system (MEX) the regular clean out of the oil collection drum under the plate separator at the bulk diesel tank.	-	Low	As above	Q2 2022
EMS:21-8	Provide training to operators that wood waste suitable for recycling is not to beplaced in the general waste bin.	-	Low	Toolbox talk currently being developed for roll-out for all dry-mill and green-mill personnel.	Complete
EMS:21-9	Update signage at gas bottle storage areas and ensure that all gas bottles arechained.	-	Medium	Signs ordered and on-site. Awaiting installation.	Q2 2022
EMS:21-10	Review appropriate disposal option for aerosol cans in accordance with applicable regulations and update the Waste Management Plan (WMP) to include this option.	-	Low	Currently being considered as part of the WMP review.	Q2 2022
EMS:21-11	Review recycling opportunities for waste plastic strapping to avoid disposal throughgeneral waste bin and update the Waste Management Plan (WMP to include this option.	-	Low	Currently being considered as part of the WMP review.	Q2 2022
EMS:21-12	Update the EMP's objectives to include achieving compliance with applicable legaland other requirements (i.e. the DA and EPL).	-	Low	Review and finalisation of all management plans currently underway. Once complete, updated versions will be forwarded to Oberon Council and DPE for comment.	Q2 2022

Section 3.0 Introduction

Highland Pine Products (HPP) is a 50/50 Joint Venture (JV) sawmilling company owned and operated by Pentarch Forestry (Pentarch) and AKD NSW (AKD). The site forms part of the Oberon Timber Complex (OTC) which includes a number of wood product manufacturing processes owned by the Borg Group.

Construction of the main HPP manufacturing site, located via Albion St in Oberon NSW, was completed in late 1996 by then owners CSR Limited as part of their fully integrated sawmilling and wood product manufacturing process. During the reporting period (Q3, 2021) previous JV partner Boral Limited sold its 50% stake in HPP to Pentarch Forestry. AKD purchased Carter Holt Harvey's 50% stake in HPP during Q3 2018 to become a JV Partner.

Section 4.0 Scope

This Annual Environmental Management Report (AEMR) has been prepared to document compliance with conditions outlined in Development Approval (DA) 403-11-00 and Environment Protection Licence (EPL) 11229.

Condition 6.1 of the DA obliges HPP to:

a) Identify all the standards, performance measures and statutory requirements that must be complied with.
b) Review environmental performance against these standards, performance measures and statutory requirements.
c) Identify all occasions of non-compliance.
d) Include a summary of any complaints and the actions taken to address them.
e) Include detailed environmental monitoring data and identify any trends.
f) Describe actions to correct non-compliance and who will be responsible for carrying out those actions and,
g) Incorporate EPA Annual Return requirements.

This document reports on environmental performance for the 2021 calendar year for the HPP business. Historical data covering the last five years of operations have been included as part of this AEMR to satisfy the requirement at point (e) above as an identification of trends where individual results may vary. Data greater than 5 years is not considered relevant given changes to the operations are on-going and dynamic.

Section 5.0 Purpose

The purpose of this AEMR is to:

- Provide details of the system of environmental management.
- Report the results of relevant environmental monitoring and,
- Comply with Condition 6.1 of Development Consent 403-11-00 dated 31 May 2001.

Section 6.0 Statutory Approvals

The activities undertaken at HPP are regulated by the consent instruments as listed in **Table 1**.

Table 1: Statutory Approvals

Activity	Approval/Licence/Permit	Relevant Authority
HPP Sawmill	EPL: 11229- authorising *wood or timber milling or processing works and wood preservation.*	Environment Protection Authority
	Development Consent :403/11-00	Department of Planning
	Planning Certificate (2000/63) and Development Consent(s): 136/95; 138/95; 139/95; 140/95; 141/95; 142/95; 144/95; 146/95; 91/96; 119/96; 128/96; 28/98; 203/98; 165/99; 191/99; 204/99; 20/01; 63/01; 116/01; 117/01; 217/01; 218/01 and 24/02.	Oberon Shire Council

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Section 7.0 Operations Summary

7.1 OBERON AND SURROUNDS

The township of Oberon (Elevation ~ 1,100m) is located at the southern end of the Tarana Valley, approximately 200km west of Sydney. The Oberon district had a population of approximately 5,300 in the 2016 census.

The Tarana Valley consists of gently undulating terrain, with land usage outside the Oberon Township and its immediate surrounds being dominated by agriculture, national parks, reserves and commercial Radiata Pine Plantations.

The main industry in the district is timber milling and wood products production. HPP makes a significant contribution to the wood products production of Oberon with an annual output of more than 234000 m^3 of sawn timber in 2021.

7.2 AERIAL VIEWS OF OPERATIONS

Figure 1; Satellite image of HPP and surrounds

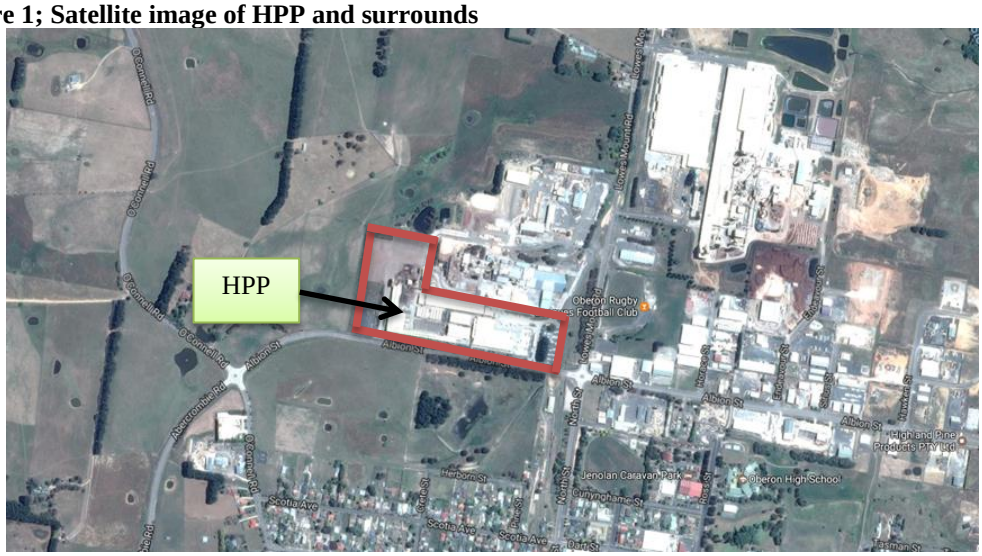
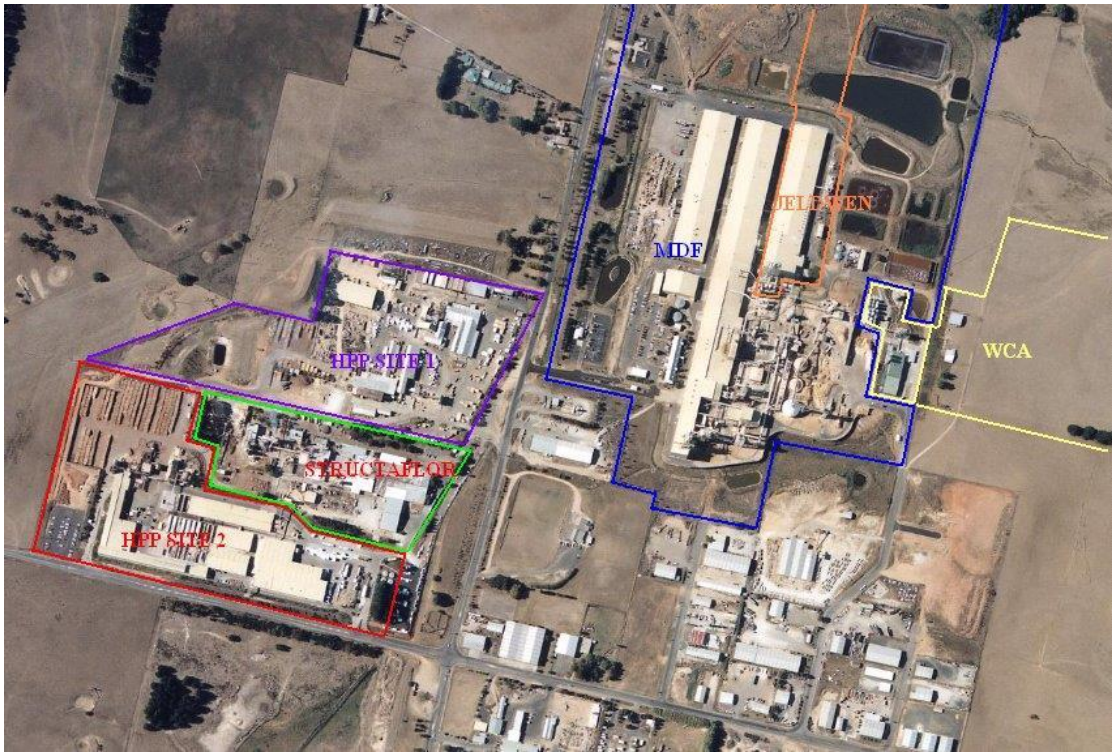


Figure 2: Details of Boundaries of Oberon Timber Complex (HPP Site 2, the subject of this Report and the relevant approvals, in red)



7.3 HISTORICAL AND CURRENT OPERATIONS

The HPP Site 2 Sawmilling operation is considered part of the wider "Oberon Timber Complex" (OTC). Until the third quarter 2018, HPP was a joint venture between CHH and Boral Timber. The joint venture between Boral and CHH was formed in August 2000 and in Q3 2018 AKD NSW purchased CHH's 50% stake in the company. In Q3 2021, Pentarch Forestry purchased their 50% stake in the JV from Boral limited.

HPP operates an integrated timber processing facility less than one kilometre north of the centre of the Oberon Township. The HPP site was constructed in 1996 and operates 24 hours a day, 7 days a week. It directly employs approximately 192 people and significantly more indirectly.

The factory produces structural timber through the following process:

- Log is procured from state and private forests generally within a 100 km radius of the HPP sawmill. In recent years, minor quantity log supplies have been transported from up to 400 km away.
- Trucks deliver the log sorted by diameter, with branches removed.
- A five-day production capacity log stockpile onsite feed the HPP sawmill.
- Logs are processed in three stages Green mill, Kilns and Dry mill.
- In the Green Mill the log is debarked, scanned to select the "best cutting pattern" and then broken down to pre-set parameters at a number of inline sawing stations. The resulting timber sections and lengths are sorted and stacked.
- In the kilns the timber is dried for 6 to 10 hours to reduce the timber moisture to 12%. After drying the timber is sent to the Dry mill.

- In the Dry mill the timber is planed, graded/sorted, stacked and wrapped for dispatch.
- Approximately 30% of the finished timber is treated with bifenthrin, an insect repellent. This is likely to increase to 50% in coming years.
- The HPP sawmill has a capacity to process 725,000 m3 of Radiata pine logs per annum. The sawmill product is mainly for structural/housing timber framing.

Development Consent 403-11-00 provides for an annual production cap of 265,980 m^3. For the reporting period 2021 the volume produced was 234,535 m^3. The increased production on the previous reporting period (Approx. 3000m3) was put down to strong demand during the pandemic and economic stimulus from the Federal Government relating to the housing industry.

7.4 FORECAST OPERATIONS FOR 2021

The forecast total processed timber operations for 2022 are very similar to 2021. High housing demand and a reduction in imports has driven a change in product mix for the reporting period, while overall production rates remained relatively static. The demand for treated timber is forecast to continue well into the next reporting period with 110000m3 forecast production. With the 2020 Bushfire impacts flowing through to timber availability within HPP's historical "wood basket", in 2021 the site needed to cover supply shortfalls from other areas of the state. **Table 2** summarises forecast and short-term trend in operations.

Table 2; Summary of Forecast Operations

Material	Fee Based Scale	Consent Limit (output)	Previous Reporting Period (Actual)	This Reporting Period (Actual)	Next Reporting Period (Forecast)
	Licence 11229	DA 403-11-00	Jan-20 to Dec- 20	Jan-21 to Dec-21	Jan-22 to Dec-22
Untreated Timber (m3)	N/A	N/A	154731	139019	125888
Treated Timber (m3)	> 30,000	N/A	76924	95516	110000
Total Processed Timber (M3)	>200,000	265,980	231655	234535	235888

Section 8.0 Actions Required from Previous Reviews

In 2021 an **Independent Environmental Audit: Planning and Environmental Compliance (IEA)** was carried out by EnviroRisk Pty Ltd. Outstanding actions from previous reviews have been noted as part of the audit and incorporated into the final report. Two administrative actions remain outstanding from the 2019 IEA as detailed in **Table 3**. Completed actions have been provided as **Appendix K.**

Table 3: Actions from Previous Reviews

Reference	Recommendation	Priority	Rec Action	Status
Development Consent DA 403-11-00 Conditions				
DC:19-1 (2019 Audit)	HPP liaise with DPE as to the best process under the Environmental Planning and Assessment Act, or an associated Act to modify consent conditions which are no longer directly relevant for the operations e.g., car park spaces, western by-pass, noise limits, incorporating of monitoring into Greater Oberon Timber Complex.	**Medium**	**Initially, engage with DPE on the best way forward.** **A number of conditions of the DA are historical and no longer relevant.**	**In progress. Initial discussions held with DPE.**
DC:19-7 (2019 Audit)	Prepare a Landscape Management Plan and provide to the D-G for approval.	**High**	**LMP Finalised based on DPE requirements. New Lodgement due Q2 2021**	**Lodgement due Q2 2022.**

Section 9.0 Details of Current Period Non-Conformances

In 2021 an **Independent Audit: Planning and Environmental Compliance** was carried out by EnviroRisk Pty Ltd covering the 2019-21 reporting period. Non-conformances and opportunities for improvement relating to the Environmental Management System, Development Approval and Environmental Protection Licence are provided in detail in section 2.1, including a site response to the auditor's findings. Considering the two-year audit reporting period, the site achieved an overall compliance rating of 87%.

Parameter	Details of Non-conformance	Action Required	Responsible Person	Projected Completion Date	Direction from Agency
See section 2.1 for detail.					

Section 10.0 Environmental Management System

10.1 POLICIES AND OBJECTIVES

The environment management system employed at HPP for the reporting period is based on and underpinned by AKD and Pentarch environmental objectives. The Highland Pine products Environment Policy is attached as Appendix A.

HPP has adopted the following environmental management objectives:

- Manage and monitor operations to protect the environment and meet legislative requirements.
- Use resources efficiently and minimise waste.
- Consider environmental implications when planning new products and processes.
- Continually review performance and investigate opportunities for improvement.
- Maintain an open and honest dialogue with the community.

10.2 ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW

The HPP environmental management system (EMS) framework sets out the process for the management of environmental risk across the site. The Environment management plan (EMP) details how activities designed to mitigate environmental risk will be implemented.
There are a number of individual risk modules associated with the EMP.

- Pollution Incident Response Management Plan (PIRMP)
- Waste Management Plan (WMP)
- Landscape Management Plan (LMP)
- Emergency Response Plan (ERP)

Each module is an operational management plan designed to provide personnel with detailed instruction in the management of specific risks.

The site uses tracking software (Risk Manager™) to ensure tasks are allocated and tracked to completion. The General Manager has full visibility of tasks allocated and progress toward completion.

The environmental management system used in the Risk Manager™ software have been developed considering the following three modules.

1. *Obligations.*
   The Obligations module has been developed to track compliance related tasks to completion. If an obligation is not completed by the due date its action status is elevated to the General Manager who has ultimate responsibility for compliance on site.

2. *Corrective-Actions.*
   The Corrective Actions module tracks actions arising from incidents and near misses that are generally one-off in nature. Once an incident or near miss has been logged into the system all related corrective actions are linked and tracked to completion.

3. *Review*
   The Review module has been developed to track actions and recommendations from internal audits, external audits and other operational reviews. Like the other 2 modules, a key part of the

process is the elevation of tasks that have not been completed by the due date to a Senior Manager.

The EMP is attached as Appendix B.

10.3 RESPONSIBILITIES

Overall responsibility to ensure compliance with environmental obligations falls on the General Manager. Delegated authority sits with the Site Leadership Team, the Site Services Manager and Functional Specialists (under contract from time to time) to manage environmental impacts and ensure controls remain effective.

Table 4: Environmental Management Responsibilities

Responsibility	Position	Person
Overall environmental compliance	HPP General Manager (on behalf of the HPP Board of Directors)	Mike Bitzer
Daily control of environment management	Site Lead Team	Lead Team Members (Senior Management)
Support Site Lead Team	Site Services Manager	Ben Gawehn
Advice – Environmental Risk	Environmental Consultant	Spiro Kavalieros

10.4 TRAINING AND INDUCTIONS

To ensure a culture of environmental awareness, all new employees, contractors and visitors to the HPP site undergo a site-specific Safety, Health and Environment Induction. Additional environmental training packages are also routinely provided for HPP employees in key risk areas where a need has been identified. Records of environmental training are kept by Human Resources Department.

HPP's Pollution Incident Response Management Plan (PIRMP) is a key document in avoiding and reducing environmental harm. The PIRMP allocates responsibility to all employees in the event of a loss. The external (publicly available) PIRMP is attached as **Appendix C**. HPP conducts PIRMP training for all employees via Toolbox Talks. A detailed annual review of the PIRMP is carried out by senior management to ensure it remains current and operational. HPP also conducts monthly Toolbox Talks for all employees on a number of risk related issues.

10.5 ANNUAL RETURNS

The site operates under Environmental Protection Licence (EPL) 11229 issued by the NSW EPA. The annual return reporting period covers dates 13/08/20 – 12/08/21 inclusive. **Table 5** provides additional detail regarding the annual return. The signed 2021 annual return detailing environmental performance is included in **Appendix D**.

Table 5: Annual Return Details

Year	Period Covered by Annual Return	Due Date	Date Received by EPA	Non-Compliance	Details of Non-Compliance
2021	13/8/2020 to 12/8/2021	12/10/21	6/10/21	No	N/A

During the reporting period, the site showed good compliance with requirements as detailed in the site environmental protection licence.

10.6 MONITORING QUALITY CONTROL

Environmental performance monitoring is undertaken using standardised testing protocols and calibrated equipment by qualified employees and accredited third-party contractors. Analysis of environmental samples is completed by laboratories accredited with the National Association of Testing Authorities (NATA).

10.7 ENVIRONMENTAL PROTECTION LICENCE 11229

10.7.1 Current Version

Current version date of EPL 11229 is 17-Feb-2021, is available from the EPA website and attached as **Appendix E**.

10.7.2 Variation History

The Environment Protection Licence (EPL 11229) was varied during the reporting period removing historical conditions. The EPL variation history is provided in **Table 6.**

Table 6: Variation History

Year	EPA Reference Number	Date Issued	Summary of Variations
2010	1112186	15 April 2010	• Insert scheduled activity - wood preservation • Insert conditions for wood preservation including emissions points and operating parameters • Allow HPP to receive specified waste (boiler fuel) under waste resource recovery exemption • Revise general condition to control dust • Require HPP to amend or develop an Emergency Response Management Plan by 15 July 2010 • Minor amendments to noise testing requirement to tidy up wording • Minor amendments to update notification of harm details • Delete condition U1 – Noise Source Assessment • Delete condition U2 – Noise Attenuation and Further Assessment • Amend Definitions and End Notes to reflect variations above.
2012	1504742	26 March 2012	• Variation issued by EPA to update their records when implementing a new licensing system. No change to 2010 EPL but new EPL has version date 26 March 2012
2013	1510007	8 January 2013	• Amend condition L3- noise limits following extensive works and studies 2006 to 2009
2014	1521066	1 September 2014	• The addition of the Pollution Studies and Reduction Program (U1) for the implementation of short -term, mid- term and long-term options to reduce noise from the premises. • A correction of the street address for the premises. • A correction to reference to condition number in condition A3.2. • Adjustments to the terminology used to describe the type of monitoring and discharge at licence point 1 (LDP1); and • Some minor changes to Special Condition E1 with the removal of the reference to the Annual Environmental Management Report.

Year	EPA Reference Number	Date Issued	Summary of Variations
2016	1542425	19 July 2016	• The addition of a pollution reduction program for the heat plant upgrade (condition U4.1); and • Formatting edits for licence condition E1.1.
2017	1554004	3 August 2017	• The removal of condition U4.1 – heat plant upgrade • The removal of the old condition P1.2 as it was not required. • The addition of emission limits for Point 1; • The addition of an EPA identification number for the on-site weather station (at condition P1.1); and • The updating of condition L3.1.
2018	1567059	13 July 2018	• Correct units for reporting annual stack test gas density
2018	1567184	20 July 2018	• Allow continuous boiler stack opacity monitoring to be suspended while monitoring equipment removed and sent for repair to Europe • During the time the faulty equipment is not available opacity to be monitored twice daily using a manual Ringelmann chart during daylight
2018	1572581	19 November 2018	• Reinstate continuous opacity monitoring equipment on boiler stack
2019	1578420	11 April 2019	• Removal of PRP condition U1 - 'Long Term Noise Reduction- Implement Short Term Options'.
2021	1597013	17 Feb 2021	• Updating of references to licence point location figures under conditions P1.1 and P1.2 • The removal of redundant dust monitoring points 2, 3 and 4 under condition P1.1 and all associated monitoring requirements under condition M2.2. • The removal of condition O4.1 'Emergency response'. This condition is redundant owing to the need for all licensees to prepare Pollution Incident Response Management Plans under s.153A of the Act. • The updating of the sampling method for carbon monoxide for Point 1 under condition M2.1 (from Other Approved Method 1 to TM-32). • The removal of weather monitoring requirements under condition M4.1. The licensee will refer to the Bureau of Meteorology's official Oberon weather station for meteorological data. • The removal of condition U1.1 following the submission of a report by the licensee on the 'Long Term Noise Reduction - Implement mid term options'. Existing condition U2.1 becomes condition U1.1.

10.8 SPECIAL CONDITIONS

The current EPL 11229 contains the following Special Condition relating to ongoing noise reductions under a PRP. **Section 14** details nose mitigation works undertaken during the reporting period.

E1 Ongoing Noise Reduction

The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction. To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement.

The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M7.1, in a report to be provided to the EPA within three months of the conclusion of each reporting period for the premises.

10.9 POLLUTION STUDIES AND REDUCTION PROGRAMS

10.9.1 Noise

In February 2021, special condition U1.1 (mid-term noise options) was assessed as completed by the EPA and removed from EPL 11229.. With the finalisation of mid-term noise plan, existing condition U2.1 (long term noise options) now becomes condition U1.1. The PRP is further discussed in sections 12.3 and 14.1.

U1 Long Term Noise Reduction - Implement long - term options

U1.1 The licensee must by 30 November 2023 report on completion of the long-term noise attenuation actions (1-9 years) of Table 1. The report must include, but not necessarily limited to:

• details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long-term options for attenuation by location (Table 1. 30Jun13), or any subsequent revision from mid-term reporting.

• details of noise reduction(s) achieved from various sources (locations) within the premises.

• details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations.

• any changes proposed to options of attenuation to ensure noise emissions from premises can comply with 45 dB(A) LAeq (15 minute) noise limit by 30 December 2023.

By 30 December 2023, the licence must achieve a 5 dB(A) noise reduction from the premises as after 1January 2024 the EPA will be amending the night time noise limit of licence 11229 by 5 dB(A) to 45 dB(A) LAeq (15 minute).

Background to Long Term Noise Reduction Program

Note: Consistent with developing a long -term continuous noise improvement program for the Highland Pine Products (HPP) sawmill, the licensee completed and submitted to the EPA the following reports;

1) a Survey of Occupational Noise Exposures in Green and Planer Mills (report) by Knox OHS Solutions March 2013 and

2) Table 1: HPP Noise assessment. Short term and long -term options for attenuation by location (Table 1- 30 Jun 13 30Jun13).

By the above conditions U1 to U3 (sic), the EPA requires the licensee to implement a long term noise improvement program for the HPP sawmill to achieve a 5 dB(A) reduction in noise from the premises within 10 years to be able to meet a night time noise limit of 45 dB(A) LA eq (15 minute).

As the improvement program is for 10 years and HPP Noise Assessment (Table 1) represents "potential" attenuation options at the time of preparation, the licensee is not bound to follow the short-mid-long -term works identified for each location under Table 1. The licensee should however use Table 1 as a guide to the implementation and reporting of improvement works (what's been achieved at each interval and what's proposed for the next interval), towards achieving an overall 5 dB(A) noise reduction at the end of the 10 year program.

The short-mid-long -term approach to noise attenuation in Table 1 is the basis for the 3 Long term Noise

Reduction PRP's (condition U1 to U3). The licensee may however revise Table 1 at any time provided the revised Table 1 with a date of revision and revision number is provided to the EPA.

Section 11.0 Community Engagement

11.1 COMMUNITY CONSULTATION

The Community Consultation Committee (CCC) was established in February 2000 and engages a range of interest groups within the community. Representatives include Oberon Council, Oberon Business Association, small business operators, primary producers, OTC factory managers and interested community members. The CCC provides a forum for the transfer of information and discussion of issues for all stakeholders. The purpose and objectives of the CCC include:

1. To establish communication networks between the Oberon community and the businesses within the OTC.
2. To provide the community with the opportunity to raise areas of interest and issues of concern with the OTC in a regular public forum.
3. To assist the OTC businesses to focus on the main issues of community concern.

4. To provide a forum for the OTC businesses to explain to the community the actions being implemented to address community and environmental impacts.

Meetings were not convened during the reporting period given restrictions resulting from the pandemic. The CCC forum will be re-established in 2022.

11.2 COMPLAINTS RECORDING AND INVESTIGATION

HPP maintains a 24 hour/365 days 1800 community hotline to receive and record complaints and report emergencies. The hotline number is included in the local Oberon phone book and displayed on the entry gate. Details of all complaints are logged. three complaints relating to HPP operations were received during the reporting period.

Table 7A: Complaints Summary

Date	Time	Method of Complaint	Details of Complainant	Nature of Complaint	Actions Taken
7/9/21	**15.09**	phone	Truck leaving site partially uncovered. Paper flew off onto ground.	air	Reviewed with truck driver. Reinforced requirement to cover load.
8/9/21	**14:00**	phone	Ash fallout – believed to be coming from HPP boilers	air	Reviewed with complainant. Assessed and clearly noted ash in the complainant's yard. Reviewed with boiler management.
23/9/2021	**7:00 and 22:00**	Phone	Complainant 2km away and could not determine if noise from HPP or Borg operations.	Air (noise)	Nil Borg followed up with complainant.

11.3 TRENDS IN COMPLAINTS

Table 7B: Trends in Complaints

Year	Nature of Complaint	Number of Complaints
2014	Smoke	1
2015	Noise	1
	Employee Parking	1
2016	Noise	7
2017	Noise	5
2018	NA	0
2019	NA	0
2020	NA	0
2021	Air	3 (2)

With a large body of work undertaken in relation to noise mitigation management and control in recent years, community complaints relating to the HPP operations have reduced significantly.

Section 12.0 Environmental Performance

12.1 SURFACE WATER

Pursuant to EPL 11229 Condition L1.2 HPP does not treat or monitor any stormwater or waste water leaving the site. Condition L1.2 references stormwater manager in the following terms:

> "*In accordance with the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035, the licensee may discharge all stormwater and wastewater generated from the premises untreated to the adjoining licensed premises 3035 for treatment."*

Condition L1.3 requires HPP to advise the EPA of any changes to the Shared Services agreement.

12.1.1 Surface Water Summary

Given the integrated nature of the stormwater system between HPP and the adjacent Borg facility, an agreement has been reached regarding the management of stormwater flow across the site. HPP are required to manage their operations to reduce impacts on stormwater quality and Borg treat the water for reuse. Should Borg identify issues with stormwater quality and through monitoring identify a deterioration in historical performance, HPP are obliged to review operations and work with Borg in good faith to rectify any issues. The 2021 SWMP is attached as **Appendix F**.

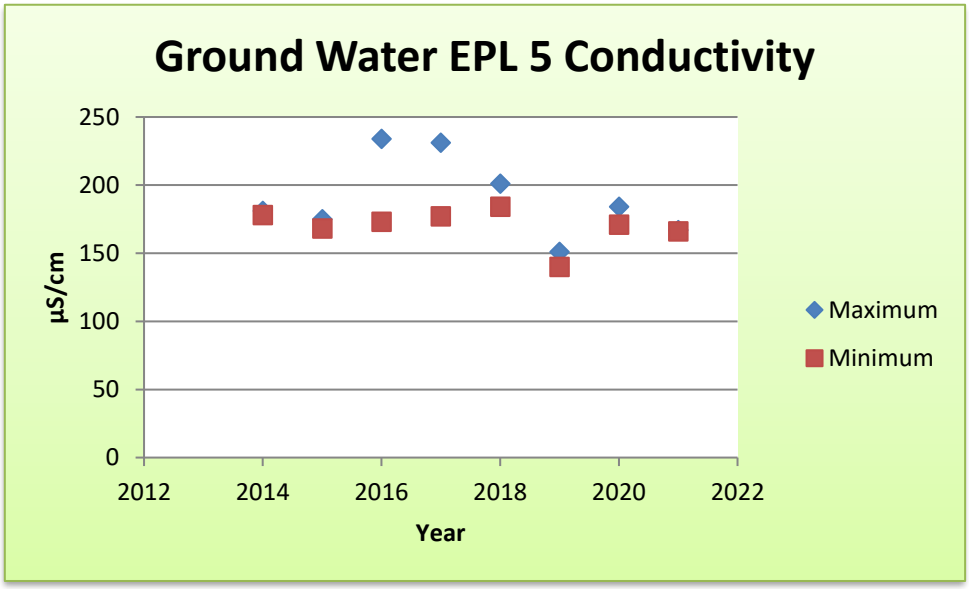
12.2 GROUNDWATER

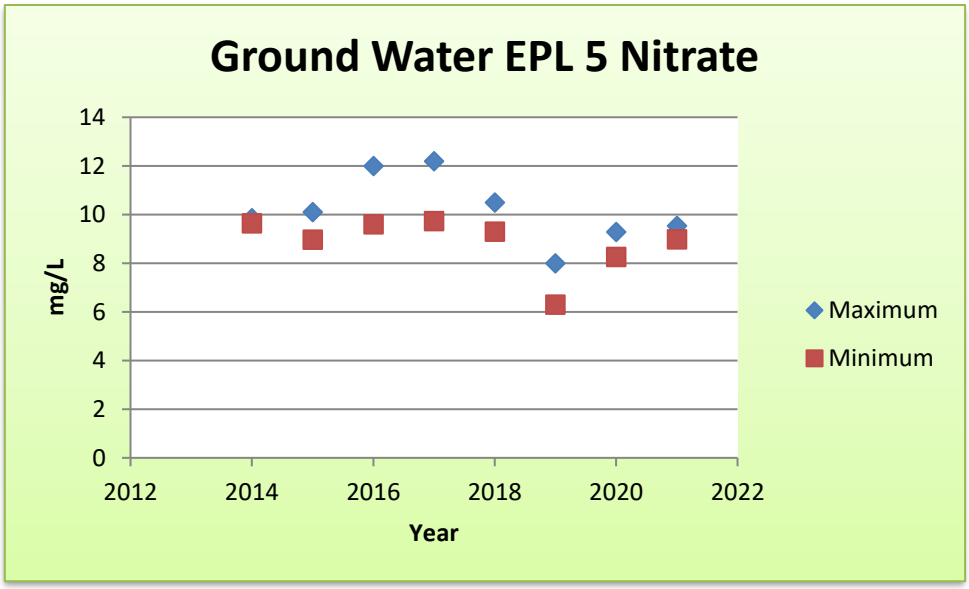
A number of Groundwater Monitoring Bores are installed across the HPP site. EPL 11229 only requires 2 bores to be monitored two times a year. Monitoring results of the mean of the two samples taken for each point and each year for the licensed bores during the reporting period are shown below. In 2022 and as a result of the latest IEA, HPP will install an additional GW well down gradient of the site treatment plant for monitoring purposes.

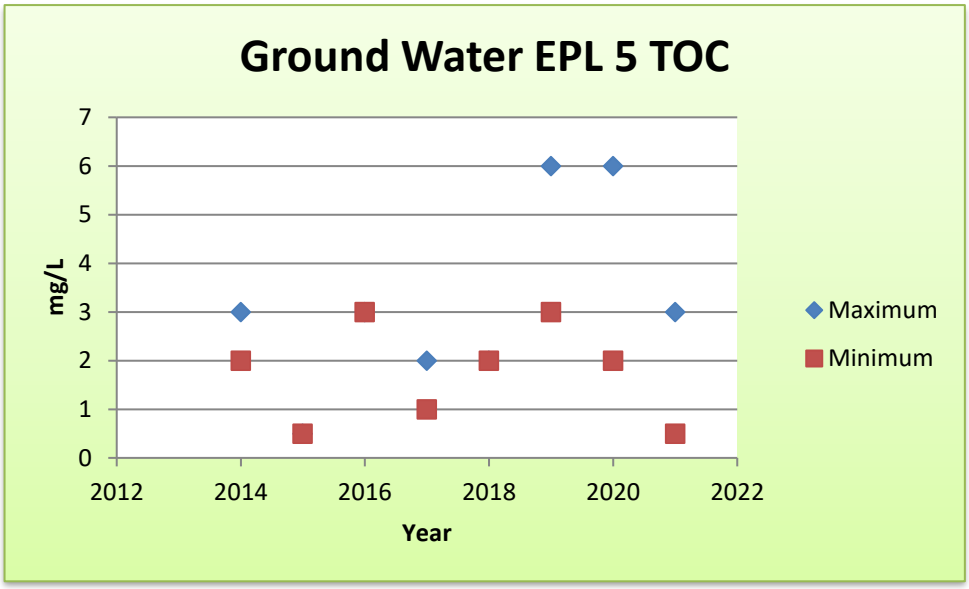
Table 8: Ground Water Monitoring Results

EPL Point 5 – Up Gradient								
Year	**Number of Samples**	**BOD (mg/L)**	**Conductivity (µS/cm)**	**Depth (m)**	**Nitrate (mg/L)**	**pH**	**TDS (mg/L)**	**TOC (mg/L)**
2014	2	<2	179.5	6.2	9.75	5.14	138	2.5
2015	2	<2	171.5	2.12	9.5	5.26	119.5	<1
2016	2	<2	203.5	1.98	10.8	5.2	132	3
2017	2	2.5	207	3.93	10.97	5.4	120.5	1.5
2018	2	<2	192.5	3.9	9.9	5.24	127	2
2019	2	1.5	145.5	4.18	7.15	5.37	110.5	4.5
2020	2	<2	177.5	3.13	8.78	5.29	116.5	4
2021	2	2.5	166.5	3.08	9.27	5.19	123.5	1.75
EPL Point 6 – Down Gradient								
Year	**Number of Samples**	**BOD (mg/L)**	**Conductivity (µS/cm)**	**Depth (m)**	**Nitrate (mg/L)**	**pH**	**TDS (mg/L)**	**TOC (mg/L)**
2014	2	<2	170	5.5	1.1	6.99	109	9
2015	2	<2	163.5	1.05	0.75	7.08	115	10
2016	2	1.5	127	1.09	0.7	6.87	79	5.5
2017	2	2	192.5	1.44	1.26	5.77	113.5	1.5
2018	2	<2	176.5	1.68	1.06	5.53	107.5	1.5
2019	2	1.5	159	1.45	0.497	5.55	99	2
2020	2	<2	182	1.24	1.52	5.67	101	1.25
2021	2	2.5	156.5	1.13	1.37	5.49	99	0.75

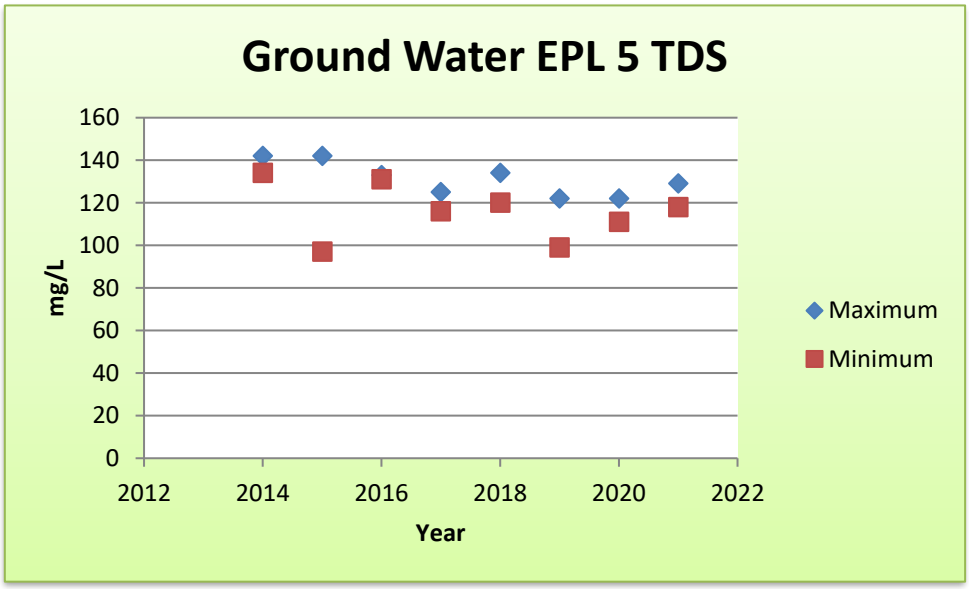
Although averaged for compliance with the EPL reporting requirements as detailed in Table 8, relevant environmental parameters of ground water monitoring data considering two samples taken annually are provided below.

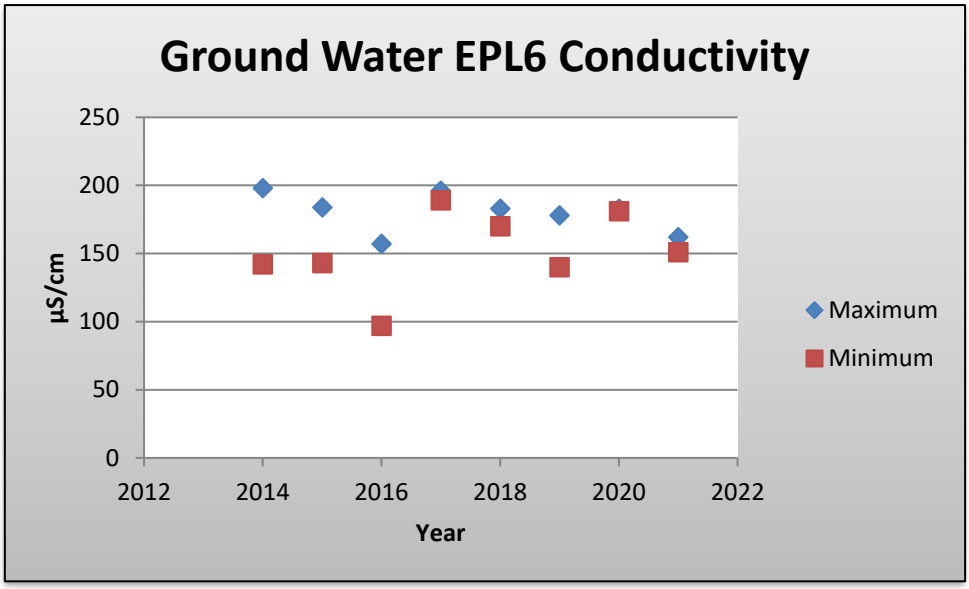

Ground Water EPL 5 Conductivity
250
200
150
100
50
0
µS/cm
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum

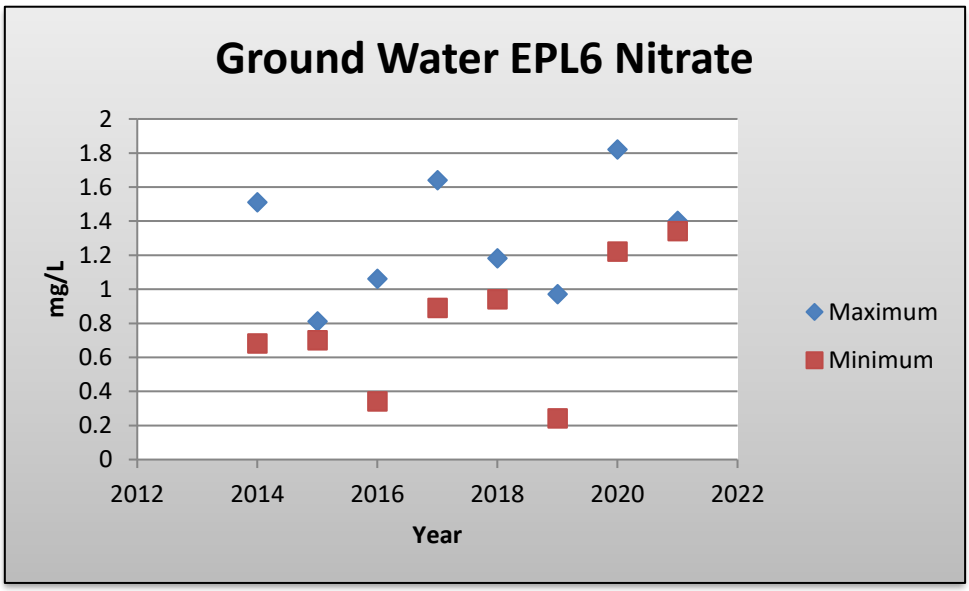

Ground Water EPL 5 Nitrate
14
12
10
8
6
4
2
0
mg/L
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum

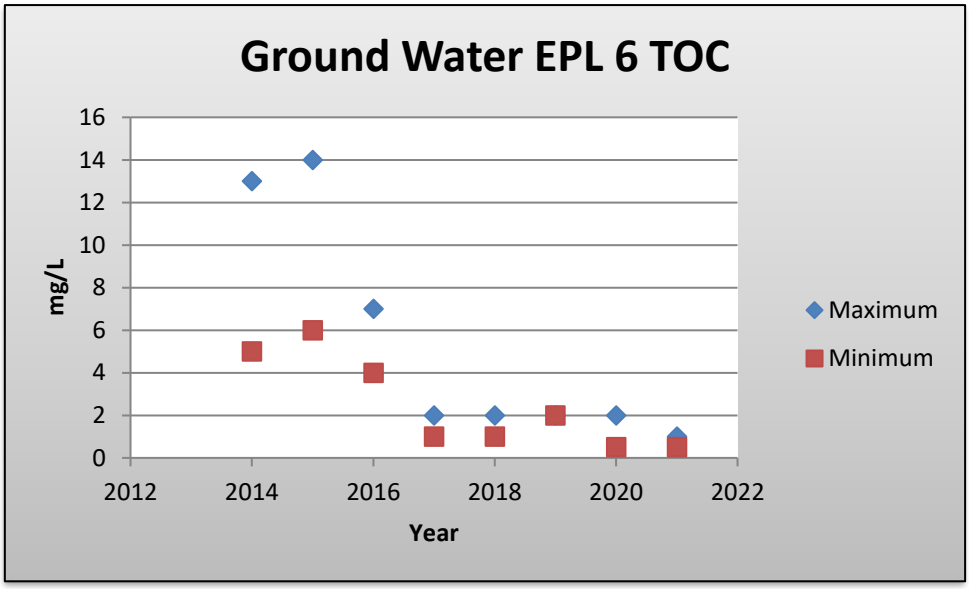

Ground Water EPL 5 TOC
mg/L
7
6
5
4
3
2
1
0
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum

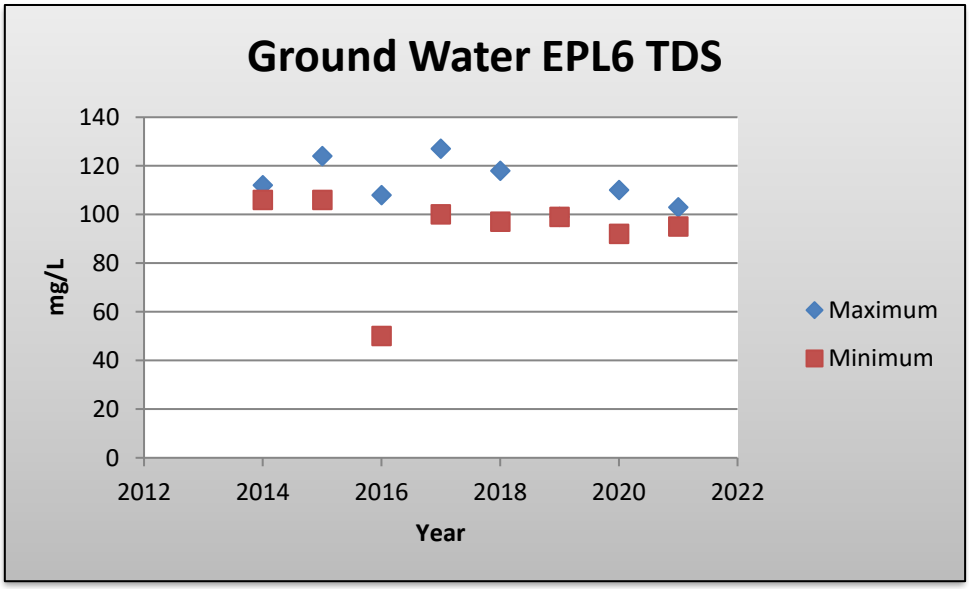
spiro kav


Ground Water EPL 5 TDS
mg/L
160
140
120
100
80
60
40
20
0
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum


Ground Water EPL6 Conductivity
250
200
150
100
50
0
µS/cm
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum


Ground Water EPL6 Nitrate
2
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
mg/L
2012
2014
2016
2018
2020
2022
Year
Maximum
Minimum





12.2.1 Groundwater Summary.

EPL 11229 does not prescribe any limits therefore ground water testing is designed to give the business an early indication of impacts from operational activities. During the reporting period, results generally showed no discernible operational impacts on ground water from current activities.

12.3 HEAT PLANT STACK

EPL 11229 requires HPP to monitor emissions from the heat plant stack by taking one annual sample. The mean of the results for each year included in annual returns in the relevant reporting periods are detailed below. Opacity is reported based on a continual 15 min average using test method CEM -1 as detailed in the EPL. Given the range of opacity results can be influenced by a number of non-routine operational factors (such as shut down/start-up, plant failure, fire etc.), the continuous monitoring result based on a rolling average is the most reliable indication of performance.

Table 9: Heat Plant Stack Monitoring Results

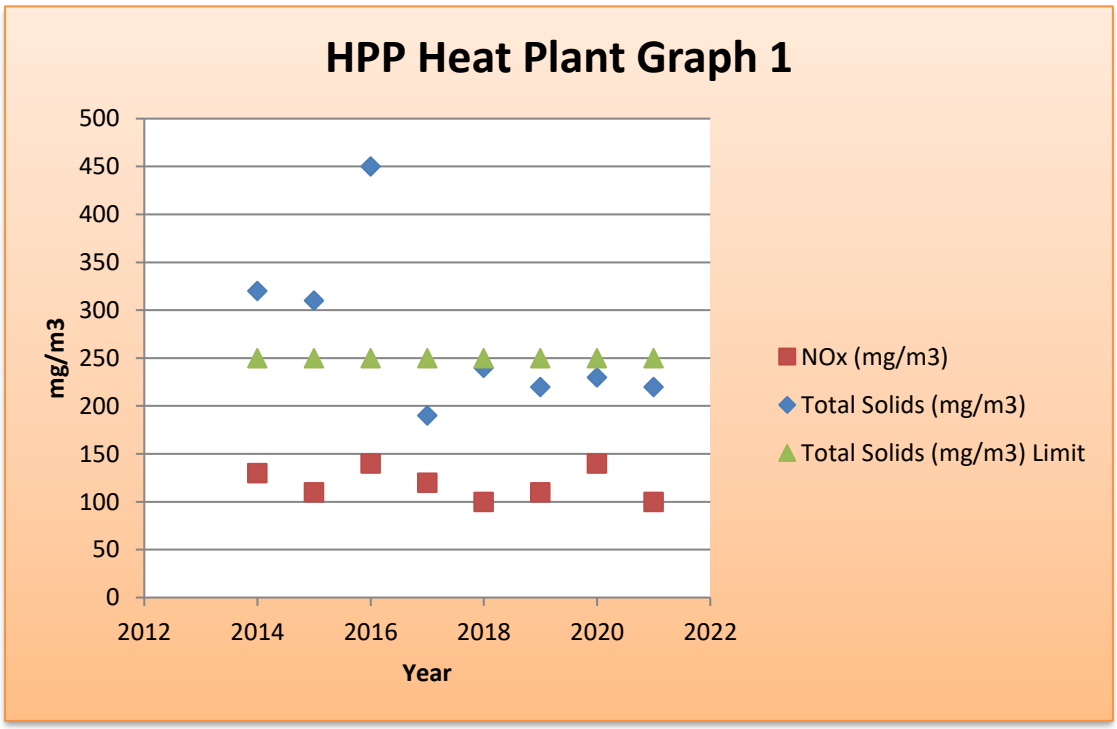
Year	CO2 %	CO mg/m³	Dry Gas Density kg/m³	Moisture %	NOx mg/m³	Opacity % Continuous	Temp °C	Total Solids mg/m³	Velocity m/s	Flow Rate m³/s
	EPL Limits									
	N/A	N/A	N/A	N/A	2500	N/A	N/A	250	N/A	N/A
2014	13	290	30*	13	130	23.4	270	320	7.4	25
2015	16	1900	30.8*	27	110	30.2	269	310	7.2	24
2016	11.7	720	30.3*	16	140	35.4	279	450	8.1	27
2017	13.5	<50	1.37	13	120	32.6	302	190	7.4	9.2
2018	10.4	330	1.35	8.5	100	37.6#	287	240	8	10
2019	12.8	38	1.36	11	110	23	316	220	8.2	28
2020	12.4	100	1.36	9.3	140	29.7	281	230	13	17
2021	11.9	640	1.36	11	100	31.1	281	220	9.5	32

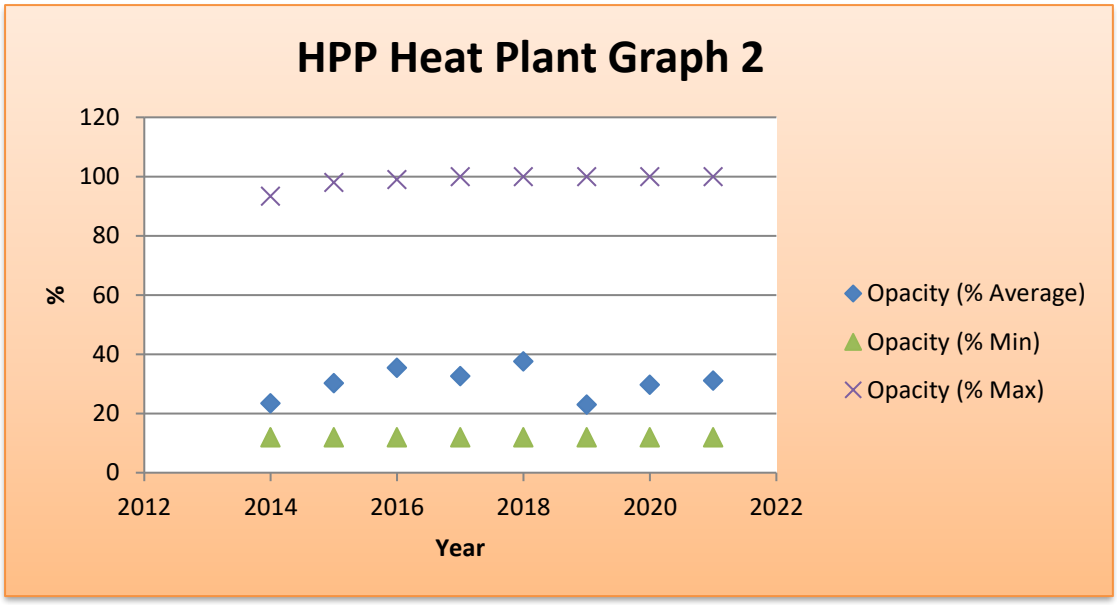
* Sample taken when boiler running at 60% capacity. Error reported to EPA in 2012 annual return

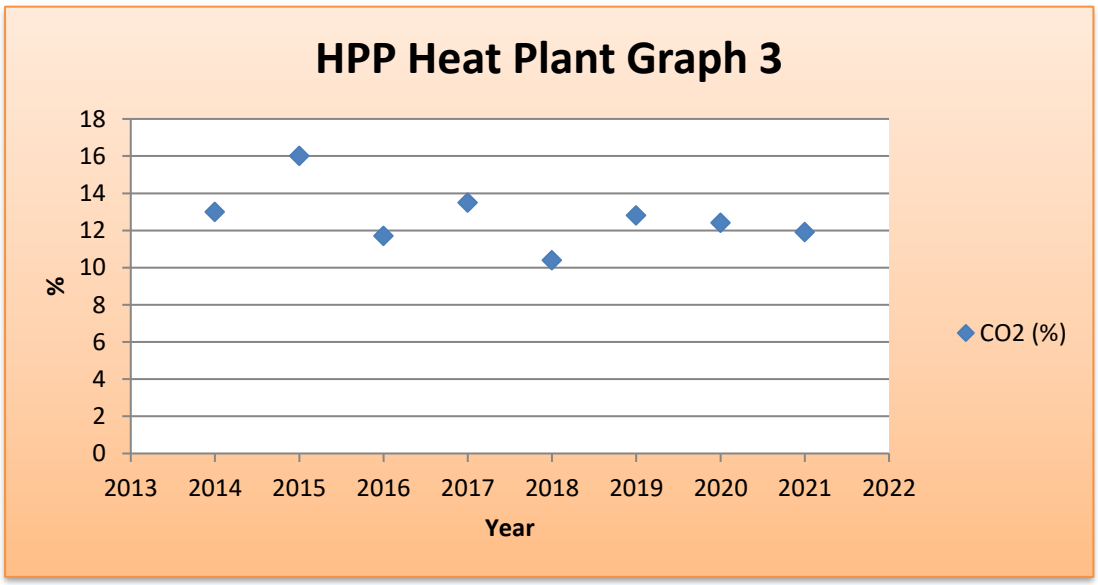
+ EPA Annual Returns 2014, 2015 and 2016 required HPP to supply "Dry Gas Density g/gmole". The proper unit for dry gas density is kg/m³ not g/gmole which is the unit for molecular weight. Over the years, the error in the pre-printed annual return has confused the people preparing the returns as to the reporting requirements for this parameter. Therefore, the data in this column is a mix of density and molecular weight numbers.

* Molecular weight of gas incorrectly reported on annual returns due to confusion caused by incorrect units included in Annual Return form provided by EPA

In July 2018 it was discovered that continuous opacity monitoring equipment was faulty. The monitoring equipment was removed and sent to the manufacturer for repair. Opacity results prior to July 2018 cannot be relied upon.







12.3.1 Air Summary

Emission testing of the heat plant is an annual requirement as outlined in the site EPL. Performance over the reporting period has been variable with opacity reporting above limits as outlined in the Protection of the Environment Operations (Clean Air) Regulation 2010 (CAR). Compliance with EPL limits was achieved with both NOx and Total Solid Particles (TSP) reported below discharge limits. The 2021 Ektimo report is provided as **Appendix G.**

The over-fire air system, installed in 2017 and now fully tuned, has resulted in a compliant total solids and NOX discharge covering the 2017-2021 reporting periods (last 5 tests).

.

12.4 WOOD PRESERVATION

Condition P1.1 of EPL 11229 lists two emission points from the bifenthrin treatment plant (EPA ID No. 7 & 8). Discharge is controlled via a mist elimination system which is routinely maintained to ensure efficiency. No testing or monitoring is required under the EPL at EPA ID 7&8.

12.5 DUST DEPOSITION GAUGES

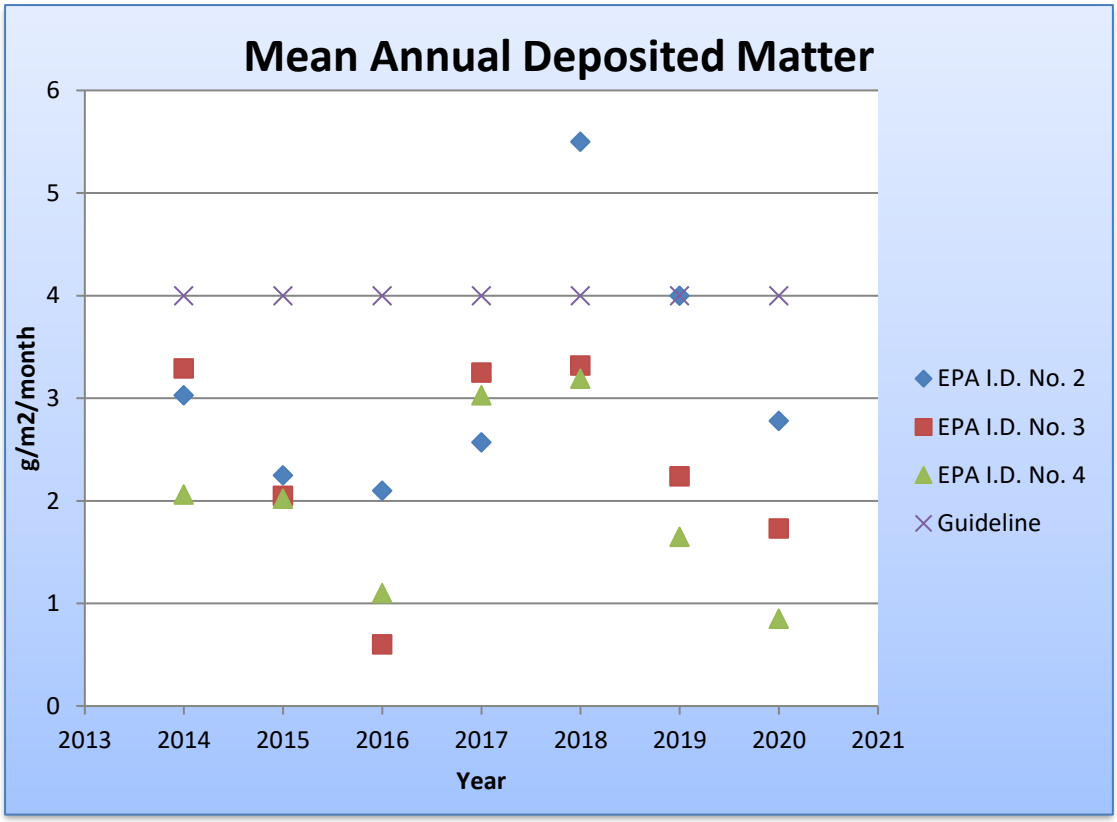
12.5.1 Dust Deposition Summary.

By license variation 1597013 (approved 17 February 2021), the EPA removed the requirement to monitor dust deposition from the HPP site. Historical data (see table 10) demonstrated compliance with guideline values (within the site boundary) over an extended period.

Table 10: Dust Deposition Monitoring Results

Year	EPA I.D. No.	Samples Required	Samples Taken*	Mean Annual Deposited Matter (g/m^2/month)+
2014	2	12	12	3.03
	3	12	12	3.29
	4	12	12	2.06
2015	2	12	12	2.25
	3	12	12	2.05
	4	12	12	2.02
2016	2	12	12	2.1
	3	12	12	0.6
	4	12	12	1.1
2017	2	12	10	2.57
	3	12	11	3.25
	4	12	10	3.03
2018	2	12	8	5.5
	3	12	8	3.32
	4	12	8	3.19
2019	2	12	12	4
	3	12	12	2.24
	4	12	12	1.65
2020	2	12	12	2.78
	3	12	11	1.73
	4	12	12	0.85

* Fewer samples than required in some years as low temperatures in winter break bottles. In 2018 the sample bottles were left in the field for periods in excess of 1 month. At no time were there no bottles in the field.
+ HPP use dust deposition data to trend performance of on-site controls such as sweepers and water carts. All dust monitors are within the site boundary and are not indicative of HPP's off-site impact.



12.6 NOISE

Noise generated by HPP is regulated by limits specified in EPL 11229 and Development Consent 403-11-00. EPL 11229 was varied on 8 January 2013 to include new noise limits as part of a 10-year Pollution Reduction Program (PRP) in consultation with the DPE and NSWEPA. The limits in these instruments do not align (see **Table 11**) given the DA is a fixed instrument and the EPL can be altered based on risk. The Annual noise assessment was completed by Atkins Acoustics and is provided in full as **Appendix H**.

Table 11: Noise Limits - HPP

	Location	$LA_{eq\ (15\ minute)}$ Noise Level **(dBA)**		
		Day (7am – 6pm)	**Evening (6pm-10pm)**	**All Other Times**
EPL 11229	Oorong or any other noise sensitive location (such as residence/school) along Herbourne or West Cunynghame Street, Oberon	55	50	50
DA 403-11-00		**$LA_{10\ (15\ minute)}$ Noise Level** (dBA)		
		Day (7am – 6pm)	**Evening (6pm-10pm)**	**All Other Times**
	Residential areas within Oberon	46	41	36
	Residential areas adjacent to industrial areas or main roads	51	46	41
	Residences within industrial areas	56	51	46

During the most recent noise test (**Appendix H**), the Atkins Acoustics report noted;

> *"the night audit winds were calm to light from the north-west(<3m/sec) at about 2340 hours a temperature inversion developed, temperatures ranged between 0-2°C.*
>
> *Measurements during the audits confirmed that the HPP LAeq, 15 min noise contributions to the ambient levels could not be measured directly for comparison with the Licence Conditions. In terms of applying the INP modifying correction factors no sources were identified that required tonal, low frequency, impulsive or intermittent adjustments. From the findings of the attended audits, the results demonstrate compliance with the EPA Environmental Licence Noise Limits".*

Table 12 provides a summary of noise monitoring data from 2016-Current.

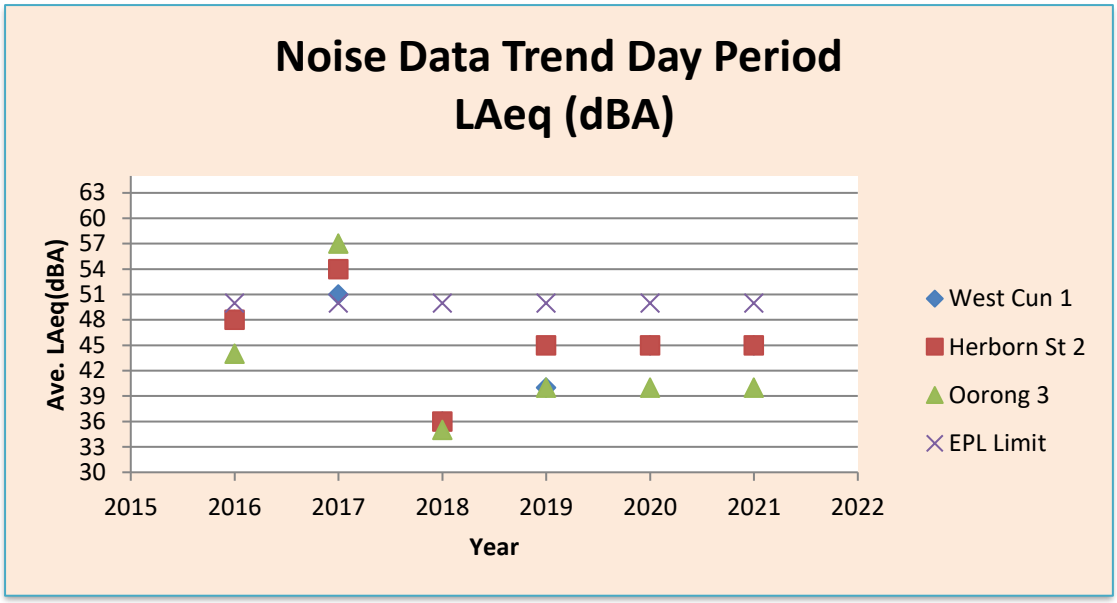
Table 12 – Noise Monitoring Data – HPP – Historical.

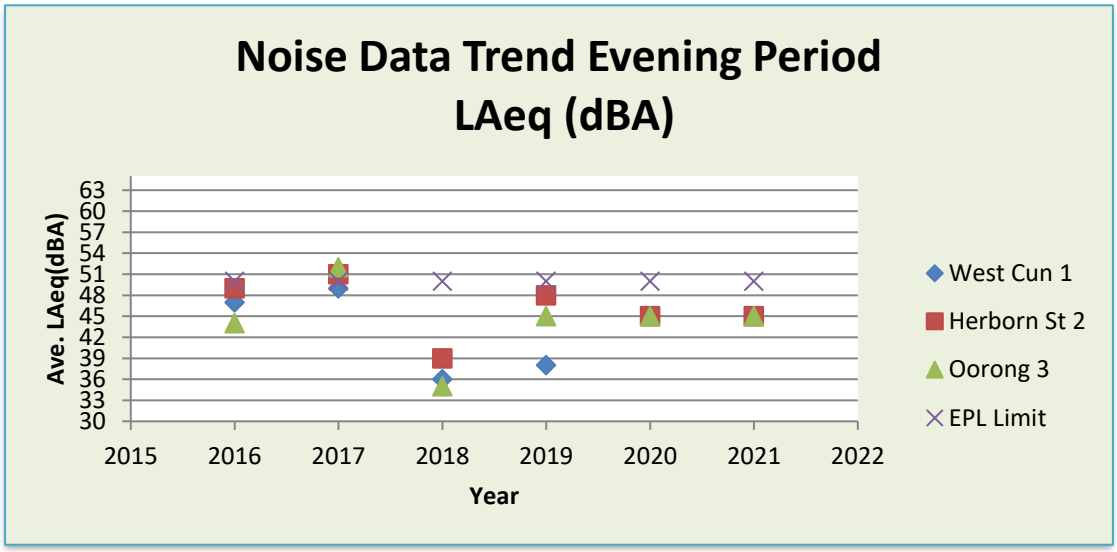
			Consent Limit 55dB(A)	Consent Limit 50dB(A)	Consent Limit 50dB(A)
AEMR Year	Author	Location	Day 7am - 6pm	Evening 6pm - 10pm	Night 10pm - 7am
2016	Dolly	1	48	47	46
		2	48	49	47
		3	44	44	36
2017	Knox	1	51	49	49
		2	54	51	51
		3	57	52	48
2018	Atkins	1	36	36	47
		2	36	39	46
		3	35	35	45
2019	Atkins	1	40	38	48
		2	45	48	48
		3	40	45	47
2020	Atkins	1	45	45	46
		2	45	45	48
		3	40	45	40
2021	Atkins	1	45	45	46
		2	45	45	46
		3	40	45	50

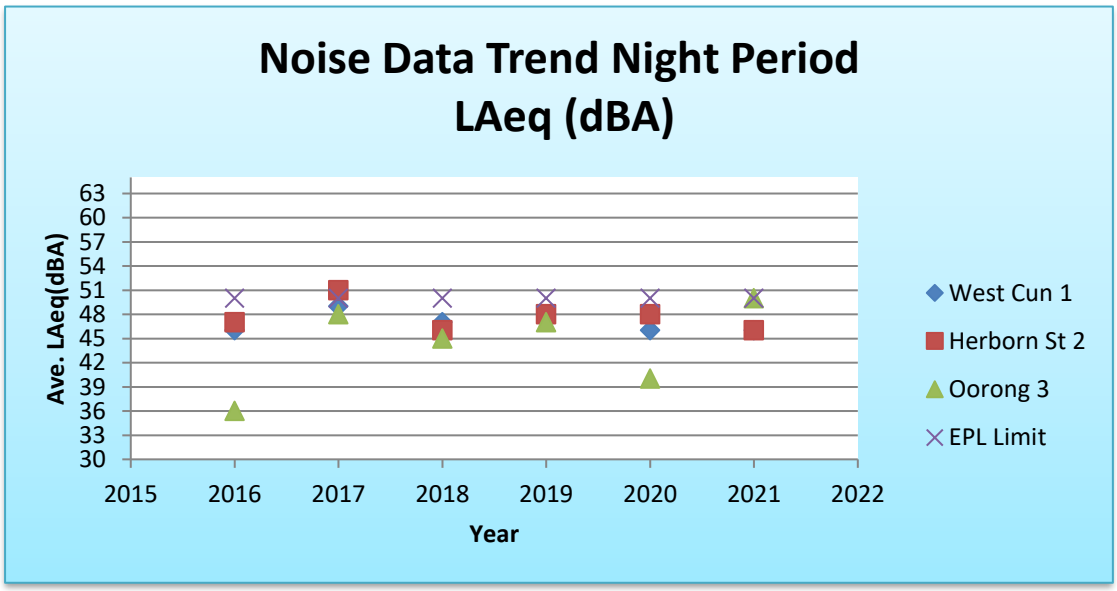
During the reporting period, the deliverable required under special condition E1.1 of the EPL was completed and provided to the NSWEPA. The condition requires:

> *"The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction.*
> *To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement. The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M6.1, in a report to be provided to the EPA within*
> *three months of the conclusion of each reporting period for the premises".*

The *HPP PRP Noise update report 2021* is discussed further in section 14.1 and provided as **Appendix I.**


Noise Data Trend Day Period
LAeq (dBA)
Ave. LAeq(dBA)
63
60
57
54
51
48
45
42
39
36
33
30
2015
2016
2017
2018
2019
2020
2021
2022
Year
West Cun 1
Herborn St 2
Oorong 3
EPL Limit


Noise Data Trend Evening Period
LAeq (dBA)
Ave. LAeq(dBA)
63
60
57
54
51
48
45
42
39
36
33
30
2015
2016
2017
2018
2019
2020
2021
2022
Year
West Cun 1
Herborn St 2
Oorong 3
EPL Limit


Noise Data Trend Night Period
LAeq (dBA)
Ave. LAeq(dBA)
63
60
57
54
51
48
45
42
39
36
33
30
2015
2016
2017
2018
2019
2020
2021
2022
Year
West Cun 1
Herborn St 2
Oorong 3
EPL Limit

12.6.1 Noise Summary.

Noise monitoring during the reporting period showed good compliance against EPL (LA_{eq}) limits. The 2019 Envirorisk Audit recommended noise limits in the DA and EPL be aligned to reflect the EPL to reduce complexity in reporting and monitoring. HPP committed to meeting the DPE in 2020 to seek to modify conditions of the DA. This was put on hold due to the pandemic and is now planned for 2022.

It should be noted that for the reporting period nil complaints were received relating to noise attributable to HPP site 2.

12.7 WASTE

HPP monitors waste generated on site. The table below summarises monitoring data for waste sent to Oberon Landfill during the reporting period.

Table 13: Waste Monitoring Results - HPP

Year	Ash (t)	Treated Wood Offcuts (t)	General/ Not Classified* (t)	Total (t)
2014	831	104	1,506	2,441
2015	1,245	586	2,850	4,681
2016	884	170	1,364	2418
2017	493	157	1,526	2,176
2018	456	222	1,809	2,487
Year**	**Ash (m3)**	**Treated Wood Offcuts(m3)**	**General/ Not Classified* (m3)**	**Total (m3)**
2019	190	20	3,156	3366
Year	**Ash (t)**	**Treated Wood Offcuts (t)**	**General/ Not Classified* (t)**	**Total (t)**
2020	420	0	1267	1687
2021	541	0	1482	2023

* General waste consists of packing material such as strapping and plastic, garbage and general non-putrescible rubbish.
**In 2019, waste was reported in m3 not tonnes as Oberon Landfill did not have facilities to provide accurate data. For 2019 and future AEMR's, waste transfers have reverted to Tonnes measurement at the HPP weighbridge.

12.7.1 Waste Summary

In late 2019, HPP entered into an agreement with Borg panels under a Resource Recovery Order (RRO) For the supply of treated timber offcuts for use in the manufacture of particleboard. Historically this product was sent to landfill as no beneficial on-site use had been established. During the reporting period, 203 Tonnes of treated wood was diverted from landfill for reuse, with the process approved to continue in 2022.

An additional 120T of ash was generated on site during the reporting period and this has been attributed to increased boiler run times and a loss in boiler combustion efficiency. In the 2022 reporting period, the site will again look to recycle/reuse ash as part of a beneficial use process under the NSW EPA Resource Recovery Framework.

An additional 200 T of general waste was sent to landfill during the reporting period, with a significant volume of packing material and waste from general clean-up on site adding to the overall total waste generated. In 2022, the site plans to complete a full waste audit to reassess options for resource recovery across all waste streams.

12.7.2 Waste Recycling/Reuse

Waste is removed by Licensed Contractors and recycled where applicable. All scrap metal is collected by metal recycling contractors. **Table 14** details waste recycled for beneficial use during the reporting period.

Table 14: Waste recycling - HPP

Waste Stream	Volume	Units	Destination
205 litre oil drums	312	Steel drums	Drum recyclers for reuse.
H2 timber offcuts	203	Tonnes	Particleboard manufacture
Boiler blowdown	18700	KL	WWTP for reuse as process water.
Small Chemical drums	93	<20 L plastic drums	Supplier return after triple rinse for reuse.
Waste oil	19500	Litres	Oil recycling

During the reporting period, Oberon Council continued its recycling program at the Oberon landfill. The initial phase of the program has targeted household waste recycling and will be extended to include industrial wastes as recycling options become available. HPP will investigate how best to participate in the recycling program as it is extended to industrial operations.

12.8 WEATHER MONITORING

By license variation 1597013 dated 17 February 2021 the EPA removed the weather monitoring requirements under condition M4.1. HPP is now required to refer to the Bureau of Meteorology's official Oberon weather station for meteorological data when investigating community concerns or complaints.

12.9 ENVIRONMENTAL PERFORMANCE MONITORING

During the reporting period, the 2021 Independent Environmental Audit (IEA) was conducted as a monitor of performance over the preceding 3 years. Results relating to non-conformance that remain outstanding are detailed in earlier sections of this AEMR with completed tasks noted in **Appendix K.** The site will next have an IEA in 2024. Covering the reporting period, all annual environmental monitoring as required under the site EPL was completed and submitted for review.

Section 13.0 Major Environmental Works

13.1 ENVIRONMENTAL WORKS.

During the reporting period, no major environmental works were commenced or completed. The site has continued to work on noise mitigation as part of the PRP (see section 14). Bushfires in harvestable areas had minimal impact on processing, with the majority of burnt log transferred to other centres better equipped to manage potential impacts.

Section 14.0 Significant Developments

14.1 NOISE LIMITS AND REDUCTION PROGRAM

In 2013, EPL 11229 was varied to include new noise limits. In 2014 EPL 11229 was again varied to include the Long-Term Noise Reduction staged program in consultation with the DPE and NSWEPA.

With the finalisation of condition U1.1 in Dec 2020 (mid-term noise attenuation), Historical condition U1.2 has reverted to U1.1 covering the final (long term) stage of the PRP.
During the reporting period, the following attenuation was reported as part of the requirements of Special condition E1.1 of the EPL. The 2021 EPL noise update report is attached as **Appendix I**.

Table 15 – Noise mitigation works 2021 (by location).

Task	Location	Type	Target Reduction
Install transfer roller table.	Greenmill	Elimination	Impact noise source - Large timber sections previously dropped into a conveyor as part of transfer resulting in an impact noise.
Steam pipe lagging.	Boiler	Attenuation	Controlled ambient - Steam pipes lagged to improve thermal efficiency but also provide noise attenuation specifically at areas of directional change.
Install compressor.	Drymill	Attenuation	Controlled ambient - New plant and sound reduction enclosure.
Install air dryer.	Boiler	Attenuation	Controlled ambient – New plant, technology and design – less noise generated via discharge from dryer.
Install Hebel sections.	Logyard	Attenuation	Controlled ambient – Replaced ply sections in sound wall with hebel to improve attenuation.
Noise curtain.	Drymill sticker infeed	Attenuation	Controlled ambient and impact noise – installed noise curtain on Drymill sticker conveyor to reduce noise breakout from Drymill building.
Noise curtain.	Greenmill stacker re-entry	Attenuation	Controlled ambient and impact noise – replaced noise curtain on Greenmill stacker re-entry conveyor to reduce noise breakout from Greenmill building.
Traffic control loop.	Greenmill bearer unscrambler and sticker conveyor building	Attenuation	Controlled ambient and impact noise – Installed traffic control loop to roller door. Door now automatically opens and closes based on forklift traffic in area reducing breakout from the Greenmill operations.
Reverse beepers.	Site	Elimination	Irregular and tonal noise – Ongoing removal of high-volume reverse beepers on all plant to low volume squawker type.

The following table details the noise mitigation measures undertaken as part of the PRP to date by location.

Table 16: Noise Mitigation Work Completed as part of the PRP.

Location	Area	Work completed	Noise mitigation work impact.
Green mill	Log line	Installation of new residue cyclones.	Heavier gauge material – reduction in chip break-out noise.
		Install sound wall panels – log yard west and north perimeter walls.	Reduce impact from log yard operations on receptors.
		Installation of low frequency reverse beepers on all plant used on site at night.	Reduction in high frequency discharge.
	HPP2 Logyard	Replace sound wall materials to the logyard west and northern perimeter walls.	Ongoing maintenance of sound wall.
		Extend bunker wall cladding.	Contain machinery noise after house when the bunker requires filling.
	Debarker	Refurbish debarker door.	Allowing closure of a doorway that was historically opened. Reducing noise breakout.
		Piping system replacement.	Allowing increased flow, reducing noise generated from hydraulic systems.
		Install sound wall panels – log yard west and north perimeter walls.	Reduce impact from log yard operations on receptors.

Location	Area	Work completed	Noise mitigation work impact.
	Maintenance hot work area	Double skinned walls.	Reduced breakout from building (specifically when working at night) during maintenance activities.
	Quad saw	Installation of sound installation and cladding to sorter building internal eastern wall.	Reduction in noise breakout throughout the Green mill.
		Installation of locking mechanism to quad saw housing doors.	Saw is enclosed. Locking mechanism on maint access door to ensure the saw must be closed before it will operate. Significant reduction in noise breakout.
		Installation of pneumatic silencers on spike roller cylinder discharge.	Reduce air discharge noise.
		Install drop down cone guides.	Reduce log fall and impact noise.
	Catech	Upgrade board edger control and scanning system (pneumatic controls upgrade)	Upgrade and installation of silences on pneumatic control systems.
	Profiler.	Control logic changes.	Operational changed to process logic to ensure specific log impact noises are eliminated.
	4 saw and 5 saw.	Installation of sound installation and cladding to sorter building internal eastern wall.	Reduction in noise breakout throughout the Green mill.
		Control logic changes.	Operational changed to process logic to ensure specific log impact noises are eliminated.
	Sorter infeed, Bin sorter, Trim saws Sorter bins, Stacker	Installation of sound installation and cladding to sorter building internal eastern wall.	Reduction in noise breakout throughout the Green mill.
	Stacker Stickers	Installation of roller door and enclosure	Reduction in noise breakout. Conveyor now enclosed.
		Process to ensure roller door is closed outside daylight hours.	Reduction in night-time noise impacts – all Green mill.
	HPP2 Green mill	Noise emissions form hydraulic systems located as part of the infeed log decks	Replacement of piping systems to reduce the noise emissions from loading and unloading hydraulic pumps.
	HPP2 Green mill	Noise emissions form logs impacting on the infeed log ladder and the mill infeed step feeder during transfers.	A design is being developed to replace the existing log ladder and step feeder with screw-based systems. In both the log ladder and step feed each log is singulated and transported by lifting and rolling each log from one pocket to the next. This creates impact noise. A screw feeder-based design eliminates the impact noise
	HPP2 Green mill	Continue with changes to various log breakdown saws control logic to remove the guide/hold down roller "falling" of the end of the cant.	During the sawing process the cant (a log partially through the staged sawing process) is held in position by forced side and top rollers. As the end of the cant passed the still pressurised rollers, they would continue to the end of their pressure stroke before retracting, creating an impact noise. Improved automatic control has allowed for better prediction of the end of the cant and the rollers are de-energise just before the end of the cant, removing the end of stroke impact and noise. Further improvements have been achieved by the installation of high intensity Photoelectric cells which are used to initiate the processes.
	HPP2 Green mill	Noise emissions form residue cyclones	The cyclones have been manufactured and are being replaced during the end of year 2019/20 shut.
	Thin board area	Process to ensure roller door is closed outside daylight hours.	Reduction in night-time noise impacts – all Green mill.
Dry mill	Strapper	Hydraulic system enclosed	Acoustic enclosure around strapper hydraulics. Reduction in external breakout.
	Stacker	Removal of pneumatic system.	Replaced pneumatic system with electric. Eliminated air discharge noise.
	Bin Sorter	Process to ensure roller door is closed outside daylight hours.	Reduction in night-time noise impacts – all Dry mill.
	Trim saw Outfeed	Dust collector pneumatic valves silencer installed.	Reduction in air discharge noise.

Location	Area	Work completed	Noise mitigation work impact.
		Secondary hoist installation.	Installation of electric hoist – Removal of hydraulic system as part of plant upgrade.
	Re-entry, stress grader. Planer outfeed deck, pack tilt hoist, residue areas, ultimiser.	Process to ensure roller door is closed outside daylight hours.	Reduction in night-time noise impacts – all Dry mill.
	Planer	Located within an acoustic enclosure which cannot run with doors opened	Reduction in noise impacts. Inside building.
	Residue area	Enclosure installed around rotary valve.	External component – reduction in tonal discharge.
		Hogger cycle frequency reduced to reduce impact noise.	Reduction in impact noise frequency due to reduction in cycle times.
	Treatment line	Secondary hoist installation	Installation of electric hoist – Removal of hydraulic system as part of plant upgrade.
	External areas – eastern side of mill.	Roller doors now closed after hours at sticker conveyor (Greenmill), Greenmill discharge and Drymill re-entry.	Reduction in operational noise impacts discharging to sensitive receptors in the east.
Boiler	Deaerator	Steam discharge	Silencer installed.
	Fuel Shed	Replaced large section of fuel shed roof	Replaced roof to enclose operational noise.
	Boiler system	Replace pipe lagging	Reduction in breakout from steam travel through pipework.
	Boiler system	Install control flowmeter	Controls overpressure discharge (steam flow discharge noise).
Site 1	Saw shop	Removed external compressor	Eliminated noise source.
	Estate	Installation of noise mound.	Western side site 1 continuation of the noise mound along site 2 (Hebel wall) and site 1 (earthen wall)
Treatment plant	Mixing area (external)	Replace pneumatic pumps with electric drive pumps	Elimination of multiple noise sources.
Site 2	All Site	Modelling exercise to establish next steps of attenuation.	Established requirement to attenuate Greenmill wall.
	All site	Annual noise survey	Track performance – assess next steps.

In 2022, the plan for the final three years of the PRP will be confirmed. Key target areas include the green mill sorter/stacker area and the log yard as both locations dominate noise emissions and provide for intermittent discharge.

Given recent results have shown good compliance with current EPL limits and marginal non- compliance with the 2024 night-time noise target of 45dB(A) $L_{Aeq15min,}$ the following actions will be the focus for the 2021/22 reporting period.

- Complete nose testing as per EPL requirements.
- Complete modeling to determine the HPP contribution at sensitive receptors.
- Finalise options for further attenuation at the Greenmill and Logyard.
- Engage with Dept of Planning on aligning the DA and EPL noise limits.
- Continuation of attenuation (minor works) program. Attenuate at the source to improve near field monitoring results.
- Assess mitigation options as part of capital upgrades to plant and equipment across the site.

The 2022-23 attenuation plan may require significant capital works in key operational areas of the plant, including the Greenmill and logyard. Modelling in Q1 2022 and the results of historical testing will provide the background to support the decision-making process.

The management, application and auditing of administrative controls (Greenmill, Drymill and sticker conveyor doors closed at night, restriction of certain activities outdoors after hours) is on-going and demonstrated as effective, with no noise complaints received during the reporting period.

14.2 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

From 6 February 2012 HPP has been required to report non-trivial pollution incidents immediately rather than "as soon as practicable". This change was brought in by the Protection of the Environment Legislation Amendment Act 2011 (the Act). The Act also required HPP to develop and implement a ***Pollution Incident Response Management Plan*** (PIRMP).

The PIRMP was developed and successfully implemented during 2012. The plan has been designed for ease of use with process flow charts and assessment notification protocols providing operational personnel with clear direction in the event of a loss. The latest version of the PIRMP is attached as **Appendix C**.

The PIRMP was not activated during the reporting period.

Section 15.0 Summary

This Annual Environmental Management Report (AEMR) has been prepared to assess compliance against conditions outlined in DA 403-11-00 and Environment Protection Licence EPL 11229.

The purpose of this document was to:

- Provide details of the system of environmental management.
- Report the results of relevant environmental monitoring and,
- Comply with Condition 6.1 of Development Consent 403-11-00 dated 31 May 2001.

The site has demonstrated good compliance with both DA and EPL conditions covering the reporting period with a significant body of work undertaken to meet compliance objectives. There has been two reportable community complaints (and one not attributable to HPP operations) and the site continues to investigate opportunities to improve environmental outcomes.

In summary:

- Air emissions total particles results have reported below the 250 mg/m3 limit since the installation of the over fire air system.
- Over 200 Tonnes of waste timber that historically would have been sent to landfill was recycled during the reporting period.
- Over 400 drums were recycled that would have otherwise been sent to landfill.
- 19000 Litres of waste oil was recycled.
- In 2022 the site will seek to remove Ash from landfill under the NSWEPA RRO and RRE process.
- The requirement to monitor dust deposition and weather was removed from the EPL.
- Condition U1.1 of the EPL (11229) was deemed satisfied by the EPA.
- The noise attenuation program as outlined in the PRP is continuing. Noise monitoring showed good compliance against EPL conditions. Tasks covering the final three years of the PRP are under development.
- The 2021 IEA was undertaken by EnviroRisk P/L. The Audit produced an overall site compliance score of 87% across Systems, DA and EPL requirements.
- There was no activations of the PIRMP during the reporting period.
- Potential for significant improvement of recycling of waste materials as Oberon council recycling program includes industrial operations.

APPENDIX A

ENVIRONMENTAL POLICY

Environmental Policy

Highland Pine Products recognises its responsibilities in relation to the management of our business in an environmentally responsible manner, to care for the environment in which we live and work, and to sustain its quality for the benefit of future generations.

Our Value Statement

A CULTURE WHERE SAFETY IS PART OF EVERYTHING WE DO

Guiding Principles

Our guiding principles for the environment are that we will endeavour to:

1) Lead with passion and integrity;
2) Build knowledge and capability;
3) Manage risks in our business;
4) Consistent use of procedures and systems; and
5) Use the right measures to drive improvement.

Responsibilities and accountabilities

Highland Pine Products strives on a continuing basis to achieve the following:

- Compliance with the provisions of applicable environmental law;
- Due consideration to the protection of the environment given in all relevant business activities;
- Provision and maintenance of systems to accurately record and report all relevant environmental incidents;
- Provision and maintenance of appropriate resources, expertise, systems of work, information, instructions and training;
- Continuous improvement in environmental performance by establishing objectives, implementing and maintaining relevant plans, and implementing and maintaining systems for measuring performance and reviewing progress;
- Minimisation and, where possible, elimination of waste and efficient use of natural resources; and
- The encouraging of positive community relationships.

Highland Pine Products requires its employees to participate in the implementation and maintenance of this policy and the environmental management system. This includes:

- Demonstrating respect for the environment in which they live and work.

This policy shall be consistent with other relevant Highland Pine Products, policies, and provides direction for environmental management systems. This policy is to be reviewed at least every 2 years and will be made available to all interested parties as required.

Approved

David Knights, General Manager

APPENDIX B

ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Highland Pine Products Pty Ltd ACN 060 059 404 A Joint Venture Company Between Boral Timber and AKD Softwoods	Title	HPP Environmental Management Plan	Doc#	01/2021
	Related to	POEO Act 1997	Revision	A
	Date of Issue	Feb 2021	Review Freq	Annual
Purpose	To provide the public with detail on systems used to manage environmental risk			

Highland Pine Products

Environmental Management Plan

HPP Site 1 Timber Mill
Lowes Mount Road, Oberon

HPP Site 2 Timber Mill
Albion Street, Oberon

HPP Treatment Plant
Stewart St, Bathurst

Environmental Management Plan Document Control

This Environmental Management Plan (EMP) for Highland Pine Products (HPP), Oberon is a controlled document.

This copy has been issued to:

Controlled Copy No.:
Position:
Current Incumbent:

Controlled copies of this EMP are held by the personnel described in the following table:

Controlled Copy Distribution

Controlled Copy No.	Position	Current Incumbent
1	EHSR Advisor	Wendy Lindsay
2	General Manager	Mike Bitzer
3	Site Services Manager	Ben Gawehn
4	Gate 3 Security	Security

Controlled copies must be approved by the General Manager before issue.

Prior to being issued, any proposed amendments to this EMP must be approved by the General Manager following consultation with the Site Services Managers.

Amendments made to this EMP shall be distributed by the General Manager to the holder of each controlled copy of the EMP. The holder of each controlled copy is responsible for ensuring that the amended pages are updated in their controlled copy.

Environmental Management Plan Amendment Register

Subsequent to the finalisation of this Environmental Management Plan (EMP) for Highland Pine Products (HPP) Oberon, the following amendments were made and require implementation.

Section	Amendments Made	Reason for Amendment	Responsibility	Done (Initial & Date)
All	Full doc review	Update to meet current operational impacts	SK	SK Sept 2014
All	Full doc review	Update to comply with external audit findings	SK	SK Dec 2015
All	Full doc review	Update to meet current operational impacts	SK	SK July 2017
All	Full doc review	Update to meet current operational impacts	SK – EHSR Group	SK Dec 2018
All	Final signoff	Final signoff – distribution of controlled copies	SK – EHSR Group	April 2019
References	Updated ref list	Audit Req	Sk – EHSR Group	March 2020
All	Full doc review	Biennial update – multiple changes	Sk – EHSR Group	Jan 2021

All	Finalisation of draft	Draft – finalisation and circulation	SK – EHSR Group	Feb 2021

Key Contacts

The Site Services Manager is ultimately responsible for implementation and maintenance of this EMP.

Name	Position	Contact Details
EPA (Regional Office)	Business Hours After Hours	(02) 6332 1838 13 15 55
Spiro Kavalieros	Environmental Consultant – EHSR Group	0418889420
Ben Gawehn	Site Services Manager	(02) 63366848 0408 821 422
Mike Bitzer	General Manager	(02)63366810 0459182501

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1. Introduction

1.1 Purpose

This document has been prepared on behalf of Highland Pine Products (HPP) to detail how environmental values, which could potentially be impacted by its operations, will be managed and protected. This document will also detail how compliance with conditions of the original Development Approval (DA), Environmental Protection Licences (EPLs) and environmental legislation will be monitored and achieved.

1.2 Background

Highland Pine Products Pty Limited is a joint venture between AKD Softwoods (AKD) and Boral Timber. HPP operates sawmilling operations as part of the overall Oberon Timber Complex (OTC). The joint venture was originally formed in August 2000 following then owner Carter Holt Harvey's (CHH) acquisition of the CSR sawmill (Site 2) located on Albion Street. In 2018, AKD purchased CHH's 50% share in the joint venture.

HPP operates an integrated timber processing facility over two adjacent sites located on Lowes Mount Road and Albion Street, less than one kilometre north of Oberon. **Figure 1** is an aerial photograph of the Oberon Timber Complex showing all site boundaries (This EMP relates to HPP operations only).

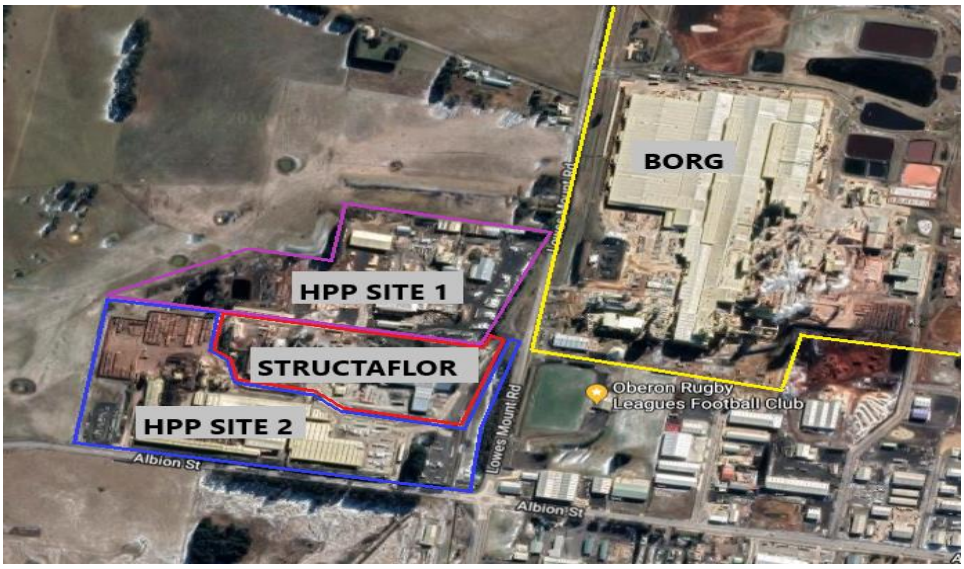


Figure 1: Oberon Timber Complex site boundaries (all sites).

The original sawmill (Site 1) was constructed in the early 1940's and expanded in the 1990's (Site 2). The site operates on a 24/7 approval, employs ~200 direct and significantly more indirectly.

HPP produces structural timber through the following process:

- Log is procured from state and private forests within a 100 km radius of Oberon.
- Trucks deliver the log sorted by diameter with branches removed.
- A five-day production capacity log stockpile onsite feeds the sawmill.
- The majority of the log is processed in four stages Greenmill, Kilns, Drymill and Bifenthrin treatment (where required).
- During the Greenmill process, the log is debarked, scanned to select the "best cutting pattern" and then broken down to pre-set parameters at a number of inline sawing stations. The resulting various timber sections and lengths are like sorted and stacked.
- In the kiln process the timber stack out of the Greenmill is kiln dried for 6 to 10 hours to reduce the timber moisture to 12%. After the drying process the timber is transported to the Drymill for further processing.
- In the Drymill, the timber is de-stacked, smooth planed, graded/sorted, stacked and wrapped for dispatch.
- Approximately 30% of the finished goods are passed through an envelope treatment system (blue frame timber treatment) where an insect repellent (bifenthrin) is applied to the outer surface.
- The sawmill has a capacity to process 725,000m3 of plantation Radiata pine log.
- The main finished sawmill product is applied in the structural/housing timber framing market.

The Bathurst Treatment Plant was first commissioned in 1980. In August 2000, the plant formed part of the Joint Venture. Fully undercover and bunded, the process involves placing timber packs into one of the two autoclaves for soaking in a treatment solution over a set period of time. The plant treats kiln dried Radiata Pine to a H2 protection level using either the LOSP full penetration or the Tan-T envelope process. The plant has been mothballed for a number of years and poses minimal risk to the environment.

1.3 Structure of EMP

This EMP is split into two main sections:

- Section 2 describes the overall requirements of the EMP and general information; and

- Section 3 describes the strategic management plans for identifying and managing risks to the environment.

2.0 General Information

2.1 Corporate Environment Policy

HPP is a joint venture business with equal shares owned by both Boral and AKD. Both businesses have a strong environmental commitment to maintaining a sustainable business in a responsible manner underpinned by their respective environmental policy documents. The current HPP Environment Policy is attached as **Appendix A.**

2.2 Objectives of Environmental Management Plan

The Objective of this EMP is to:

- Ensure the site has a documented monitoring strategy in place to identify the potential for adverse impacts from its operational activities across the three HPP sites.
- Detail processes established to mitigate adverse impacts identified as part of routine inspections or testing. And,
- Detail contingency planning protocols established as part of emergency management that mitigate environmental impacts in the event of a loss.

2.3 Statutory Obligations

Table 1 lists the specific environmental approvals relating to the HPP Bathurst and Oberon facilities. These documents may be updated in consultation with the regulator from time to time. The most current copies are provided as **Appendix B.**

Table 1: Specific Regulatory Conditions

Regulatory Authority	Regulatory Document	Facility
DPIE	Development Consent No. 403-11-00	HPP Site 2
NSW EPA	Environmental Protection Licence No. 887	HPP Site 1
NSW EPA	Environmental Protection Licence No. 105	Timber Treatment Plant Bathurst
NSW EPA	Environmental Protection Licence No. 11229	HPP Site 2
NSW EPA	Radiation Management Licence # 5090038	HPP site 2

2.4 Planning Requirements

As part of the Development Consent Approval, HPP is required to prepare an Environmental Management Plan (EMP) to show how the sawmill and associated facilities will assess and minimise operational adverse impacts on the receiving environment.

As a minimum, the EMP must:

- describe the proposed operations;
- identify all the relevant statutory requirements that apply to the operation of the development;
- set standards and performance measures for each of the relevant environmental issues;
- describe what actions and measures will be implemented to mitigate the potential impacts of the development, and to ensure that the development meets these standards and performance measures;
- describe what measures and procedures will be implemented to:
    - register and respond to complaints;
    - ensure the operational health and safety of the workers; and
    - respond to potential emergencies, such as plant failure;
- describe the role, responsibility, authority and accountability of all the key personnel involved in the operation of the site and;
- incorporate the detailed Environmental Monitoring Program.

2.5 Responsibilities

To ensure that the objectives of this EMP are met, clear responsibilities and performance criteria need to be defined for all environmental management actions and activities. Environmental management responsibilities will be incorporated into job descriptions and performance measurements, where applicable.

Highland Pine Products have engaged an Environmental Consultant (EHSR Group) for environmental advice and support, reporting directly to the HPP General Manager and to the HPP Board. The Site Services Manager is responsible for ensuring the objectives of this EMP are met with the support of the General Manager and other Managers as required. Responsibility for implementing certain components of the EMP will also be passed on to HPP personnel in relevant areas.

Table 2: Summary of Responsibities

Position	Report to	Summary of Responsibilities
Environmental Consultant	HPP General Manager.	Ensure statutory environmental safeguards are enforced, monitored and reported; Preparation, monitoring and implementation of EMP.
HPP General Manager	HPP Board	Ensure statutory environmental safeguards are enforced and allocate appropriate resources to support environmental requirements.
HPP S.S.M.	HPP General Manager	Ensure EMP objectives are met. Implement EMP environmental controls and improvements required to meet objectives.
HPP EHSR Advisor	HPP General Manager	Prepare and implement environmental training and education programs
Area Production Managers	HPP General Manager	Identify potential and/or actual environmental hazards, rectify and report. Assist EHSR Advisor with training and education programs.

2.6 Monitoring and Reporting Requirements

As part of HPP commitment to environmental management, this EMP specifies the documented monitoring and reporting procedures that regularly measure environmental aspects, objectives and targets.

The environmental monitoring program is run by the Environmental Consultant and Site Services Manager and involves:

- regular inspections of the plant and surrounds;
- both manual and automated monitoring and sampling in specific areas of environmental concern as required by Environmental Protection Licences and to demonstrate protection of the environment; and
- an internal and external auditing program, as discussed in *Section 2.9*.

The environmental reporting program involves:

- environmental licence compliance reporting, as detailed in *Section 2.7*;
- emergency incident reporting as detailed in *Section 2.11*;
- internal inspection and non-conformance reporting, which involves identification of potentially impacting practices, formulation of a corrective action plan and review of corrective action implementation;
- National Pollution Inventory reporting;
- Annual Environmental Management report.

The environmental monitoring and reporting program for specific areas of environmental concern are discussed in detail in *Section 3*. A detailed map of all required monitoring points (HPP site 1 and HPP site 2) is attached as **Appendix C**.

2.7 Environmental Licence Compliance Reporting

Within eight weeks of the anniversary of the licences **887, 11229 & 105,** the licensee must provide the Environment Protection Authority (EPA) with an Annual Return. The annual return is a statement of compliance with the licence conditions and reports the pollutant loads generated by the premises. Administrative fees for the coming 12 months generally fall due at the same time as the annual return.

The annual return is completed on-line via a secure portal (https://apps.epa.nsw.gov.au) and must be signed by the licence holder or a person authorised to sign on the licence holder's behalf where the licence holder is a company. The return will usually be signed by two company directors prior to lodgment.
The following detail must be declared as part of the Annual Return:

- whether all monitoring required by the licence has been carried out;
- if all the monitoring has not been carried out, what monitoring has not been carried out and the reasons why the monitoring has not been carried out;
- whether every condition of the licences have been complied with;
- if one or more conditions have not been complied with, in relation to each such condition:
    - the nature and reason of the non-compliance;
    - any action taken to prevent, control or mitigate the non-compliance;
    - any action that has been or will be taken to prevent a recurrence of the non-compliance.
- A statement of compliance regarding the preparation of a pollution incident response management plan (PIRMP).
- A statement of compliance regarding the requirement to publish pollution monitoring data; and
- A statement of compliance regarding environmental management systems and practices.

In signing the Annual Return, the signatory declares the information is not false or misleading in a material respect and acknowledges that information provided that is found to be misleading may render the signatory to personal penalty.

The site possesses a number of sealed source radiation devices used to scan green wood density. The site holds a Radiation Management Licence (#5090038) requiring renewal on an annual basis. The licence allows the site to *"sell, possess, store or give away regulated material (including radiation apparatus, radioactive substance or items containing radioactive substances)* for 1 year.

The licence requires renewal in October each year and remains in force until it expires or is surrendered by the licence holder in consultation with the EPA.

2.8 Public Feedback

A 1-800 Community Liaison Line (1800 802 795) is manned 24 hours a day 7 days a week by the security personnel on the site gates. This line allows members of the community to contact HPP in the event of any issues, complaints or concerns. HPP has maintained a Community Liaison Line since 1996 in accordance with consent conditions and environmental protection licences and sees it as a direct means of communicating with the community and issues raised through this channel provide a quantitative means of assessing environmental performance and the effectiveness of this EMP.

In the event of any issues or concerns raised by the public a company representative will record the following:

- date and time of the discussion;
- contact details of the caller, if provided;
- nature of the discussion; and
- suggested actions by the caller, if relevant.

The person receiving the call will then forward the details to the Site Services Manager or their designated representative as soon as practicable, who will review the comments provided. Where practical and reasonable, HPP will implement an action to correct any complaint and contact the person to advise them that an action has been implemented at their earliest convenience.

When appropriate, community concerns will be discussed at quarterly community meetings. Details of complaints and corrective action will be recorded in a register and reported as required. A copy of the Community Complaint process documentation is provided as **Appendix D.**

2.9 Audit Requirements

At least every three years an independent environmental audit will be undertaken to identify HPP's current performance in complying with environmental laws and regulations. The audit will highlight existing and potential environmental exposures and will generate corrective action to ensure continual improvement in environmental performance. Any recommendations proposed by the audit will be implemented to ensure risk to the environment is minimised and HPP is protected from legislative and policy breaches.

To ensure auditing of this Environmental Management Plan is both comprehensive and functional, environmental auditing will:

- be considered as a management tool for recognising and assessing environmental risk that can assist in developing strategies that minimise risk and improve environmental performance;
- be systematic and structured. All relevant aspects of operations at the facility need to be identified and included at an agreed level of detail in the audit;
- be verified by supporting documentation. If evidence generated by the audit is not verified, the process is then considered a review – not an audit;
- be periodic in nature and not merely an isolated exercise. The audit period may range from between six months and five years depending on HPPs requirements and the level of environmental risk being assessed;
- be well documented so that it may be verified that it has been undertaken properly. An environmental audit must be finalised with a written report of the assessment;
- be objective. Independence of auditors is an integral component of ensuring a reputable environmental audit;
- measure the level of environmental risk that operations at the facility pose on the environment and humans and devise strategies to minimise that risk. A fundamental part of the audit recommendations is to prioritise actions to minimise identified environmental risks; and
- identify areas where HPP is potentially non-compliant with legislation.

The results and recommendations of the audits, where applicable, will be incorporated into this EMP by the Environmental Consultant.

2.10 Environmental Awareness and Training

To ensure a culture of environmental awareness within HPP requires effective education and training of HPP personnel and HPP employed contractors and consultants. The success of this EMP is dependent upon training of HPP personnel to develop an understanding of the issues involved and individual roles and responsibilities identified by this EMP.

Central to this is the need for all senior personnel to recognise the value of building a belief and commitment to HPP's Environmental Policy. Training and education of HPP personnel can be viewed as a means of removing some of the obstacles to the successful and efficient implementation of this EMP.

Each individual, dependent on their role must be able to identify the potential impacts of their actions and decisions on the environment and either modify their behaviour accordingly or seek advice from their supervisor. Specific roles and responsibilities for implementation of this EMP are provided in *Section 3.0*. Records of environmental training are kept by the HPP EHSR Advisor. The following table (*Table 3*) identifies the various principles of environmental education that HPP will implement.

Table 3: Awareness and Training Principles

Awareness and Training Principles
Inclusive of all HPP personnel Environmental education cannot be confined to any group of personnel. It is a responsibility for all staff, including contractors and consultants.
Performed on an on-going basis Knowledge and skills should be refreshed in light of new environmental aspects; issues and management techniques/mechanisms.
Practical in approach This is a fundamental requirement of effective environmental education. Awareness and training programs must be geared toward actions which will effectively result in improved environmental outcomes and conditions at the facility rather than an accumulation of inert knowledge or impractical skills.
Align with other HPP goals for the facility In order for HPP to establish an effective environmental awareness training program, it needs to encourage the pursuit of environmental goals in a way that acknowledges other goals of HPP, including safety, productivity and efficiency – it should not be taught in a way that is divorced from the core business needs of the facility.
Inductions All HPP personnel, contractors and consultants will undertake an induction that will include HPP responsibilities to the environment, environmental awareness training, outline that improved housekeeping is a goal of production and their specific environmental responsibilities. Inductions will be the primary means of environmental training for the majority of personnel. Selected HPP personnel will receive additional environmental training on an as-needed basis, as assessed by HPP management.

2.11 Emergency Preparedness

The *Protection of the Environment Legislation Amendment Act 2011(the Act)* introduced a number of important changes that impact the way pollution incidents are reported and managed. One key requirement is that all licensees in NSW must prepare and implement a Pollution Incident Response Management Plan (PIRMP). The HPP PIRMP has been written and implemented to comply with the requirements of the Act and associated Regulations.

The PIRMP is a module in a suite of documents that support compliance with environmental legislation and development consents.

The EMPs and related modules comprise an integrated environmental management system. The PIRMP and its modules not only seek to ensure environmental compliance but to continually improve performance. The PIRMP is attached as **Appendix E**.

2.12 Environmental Management Plan Updating

This Environmental Management Plan is a working document and will be amended as necessary. Amendments could be made under various circumstances including:

- work practice changes;
- environmental safeguard and management strategy variations; and
- changes of legislative or regulatory controls by government agencies.

Environmental management is the responsibility of each staff member. Consequently, suggestions for document improvements by any staff member will be considered in amending this document.

2.13 Implementation

This EMP will be updated as required when operations at the site are materially altered. Any change in this document will be forwarded to the HPP General Manager for review prior to approval and implementation.

3.0 Strategic Management Plans

Section 3 of the EMP is divided into each aspect of the natural and built environment that may be affected by HPP's operations. Where applicable, the site has developed individual management plans as modules of this EMP. Operational activities at HPP may result in:

- Impacts to water: Surface and ground water. Including recycling water and fire water.
- Impacts to air: Dust; fugitive emissions including transport, point source emissions.
- Impacts on amenity through the discharge of noise & dust.
- Negative environmental impacts from poor controls and disposal of wastes.

For each of the above aspects, this EMP will:

- identify what activities are potential or actual risks to the environment;
- describe infrastructure that has been installed to mitigate the above risks to the environment; and
- describe the environmental management tasks required to monitor and/or control these risks including appropriate performance indicators, reporting requirements and any corrective actions.

This EMP will then outline responsibility and frequency of each activity. These environmental management tasks are tabulated so they can be used as a checklist by HPP staff.

3.1 Surface Water

Environmental Risks

The potential and actual risks to surface water as a result of site' activities include:

- contamination due to spills and leaks from site machinery;
- leachate from stockpiles of timber and wood chips; and
- contaminated surface water leaving site and affecting downstream receptors.

Environmental Management Infrastructure

To mitigate the above environmental risks and as detailed in the site Storm Water Management Plan (SWMP) (attached as **Appendix F**), the following infrastructure has been installed:

- bunding around areas where chemicals are regularly used and around refuelling areas;
- spill kits, strategically located across the site;
- oil/water separators;

- sealing of the majority of Site 2 and the Bathurst Timber Treatment Plant
- a diversion drain system across the site to drain surface water from non-operational areas of the site and other parts of the upstream catchment around the HPP operational areas;
- a series of first flush dams and sedimentation ponds and tanks to capture runoff, allow settlement of solids and increasing on-site detention time and thus reducing flow velocity to downstream creeks and reducing erosion;

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Inspect bunding for damage. Advise the Maintenance Manager if damage is observed or Area Managers if water level is near to capacity.	Site services manager	Every two weeks or after a significant rain event.
Inspect drains and ponds (including diversion drains), water quality and flow rate. Ensure drains are free of sediment, refuse and other obstructions.	Site services manager	Monthly
Inspect water quality of the oil/water separators and ensure vac trucks are engaged immediately if significant amounts of oil are present. Advise maintenance Manager of potential oil spills in area upgradient of separator.	Site services manager	Monthly
Inspect sedimentation ponds and tanks and ensure they have sufficient capacity to hold at least a 1 in 3 month, one hour storm. (less than 50% full)	Site services manager	Monthly
Inspect areas of potential runoff for chemical and oil staining and cleanliness. Advise Environmental Manager of presence of staining or other material.	Site services manager	Monthly
Inspect and record water quality in drains and ponds across the site as per the site stormwater management plan. Report any surface oil and very dark colour to Site environmental consultant.	Site services manager	Every two weeks.

Environmental Monitoring Requirements.

Site #/EPL	Pollutant	Units	Limit	Notes
HPP 1/ EPL 887 Surface Water	BOD	mg/L	20	HPP 1 discharge point currently diverted to land owned by holder of EPL 3035. No samples required.
	Oil and Grease	mg/L	10	
	pH	-	6.5-8.5	
	TSS	mg/L	30	
	Monitoring (with no limit) also required for the following; Filterable Iron, MBAS, TKN (Nitrate+Nitrite), Total Iron, Turbidity			
HPP 2/EPL 11229 Surface Water	HPP 2 under agreement with the adjacent landowner (EPL 3035 – Borg Panels) discharges surface water untreated for beneficial reuse.			
Bathurst LOSP/EPL 105	No requirement and site mothballed.			

3.2 Groundwater

Environmental Risks

The potential and actual risks to groundwater as a result of site' activities include:

- contamination by leachate from stockpiles of timber and wood chips;
- spills of chemicals/agents and leaks from machinery; and
- leachate from contaminated soil and fill.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- bunding around areas where chemicals are regularly used and around refuelling areas;
- spill kits strategically located across the site;
- oil/water separators;
- sealing of the majority of Site 2, the Bathurst Timber Treatment Plant and some areas of Site 1; and
- installation of an extensive series of groundwater monitoring wells across the HPP business units.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
EPL No. 11229 requires measurement of depth, nitrate, biochemical oxygen demand, electrical conductivity, total organic carbon, total dissolved solids and pH for the two groundwater monitoring wells, the results of which are included in the Annual Environmental Licence Compliance Reporting for EPL No. 11229.	Environmental Consultant or delegated representative	Bi-Annually

Environmental Monitoring Requirements

Site #/EPL	Pollutant	Units	Limit	Notes
HPP 2/11229 Groundwater	BOD	No limits		Results reported in annual return to EPA
	Conductivity			
	Nitrate			
	pH			
	TDS			
	TOC			

3.3 Process Water

Process water such as kiln condensates, boiler blowdown, etc. generated by HPP is discharged to the adjacent Borg waste-water treatment plant (WWTP) for treatment. The process enables treatment and recycling of water, greatly reducing the potable water requirement of the MDF site, as well as the volume

of wastewater discharged to the Oberon municipal sewer. This operational aspect is formalised through a Shared Service Agreement (SSA) with the Borg Group as owners of the WWTP.

Environmental Risks

The potential and actual risks to the environment as a result of site activities include:

- process water entering surface water and either causing contamination (including temperature) or increasing surface water flow velocities and causing erosion;
- contamination of or damage to the Oberon municipal sewer systems and treatment plant; and
- water wastage through lack of recycling of process water.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- waste water treatment plant located at the MDF factory with associated infrastructure;
- bunding around areas where chemicals are regularly used;
- spill kits are strategically located across the site;
- sealing of the majority of Site 2 and some areas of Site 1; and
- a series of first flush dams, gross pollutant traps, sedimentation ponds and tanks that can be used to contained excess or split process water.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
HPP Waste Water quality will be monitored daily and the HPP Kiln Supervisor notified if the volume received exceeds the agreed daily volume limit or if there is no flow.	WTP Co-ordinator and HPP Kiln supervisor	Daily
HPP daily flows for Process water discharged to the MDF Waste Water Treatment Plant under the SSA are to be recorded daily and reported every three months.	WTP Co-ordinator	Every 3 months

3.4 Fire Water

Environmental Risks

Contaminated water could be generated in the event of controlling a fire. This contaminated water could potentially damage surface water environmental receptors if allowed to flow off site.

Environmental Management Infrastructure

In order to mitigate the above environmental risk, penstock gates have been installed along the drainage line from both HPP site 2 and the adjacent Structaflor facility. HPP site 1 surface water discharge is via an easement to the adjacent MDF site, where it can be contained and pumped as required.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Inspect surface water following a fire fighting event to determine if water is able to be discharged to creeks or requires treatment and/or disposal at a appropriately facility. Undertake water sampling and laboratory analysis if required. Water quality must meet surface water requirements prior to discharge.	Environmental Consultant	Immediately after a fire fighting event
Inspect downstream surface water receptors following a fire fighting event to determine if downstream contamination is present or has occurred. Liaise with EPA and stakeholders as required. The result of the inspection to be included in the annual Environmental Management Report.	Environmental Consultant	Immediately after a fire fighting event

3.5 Dust

Environmental Risks

The potential and actual risks to the environment through dust as a result of site activities, include:

- dust generated from roads and uncovered vehicle loads, and
- dust generated from the process system, particularly from wood storage.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- sealed trafficable areas;
- buildings/sheds around certain areas of the process system;
- pneumatic transfer system to convey wood by-product generated in the process system for use as boiler fuel;
- water cart and road sweeper used to dampen down dust on unsealed trafficable areas (predominantly site 1 dispatch): and
- bag houses for dust collection from dry milling.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Undertake water cart and sweeping of road surfaces as required.	Site services manager	As required
Ensure truck loads are covered at all times, except during loading and unloading.	Site services manager	As required
Note: The requirement to monitor and report on dust deposition was removed from the site EPL in Jan 2021 given the long history of compliant monitoring across the site.		

3.6 Air Emissions

Environmental Risks

The potential and actual risks to the environment through air emissions as a result of site activities, include:

- smoke (predominately a mixture of carbon monoxide, carbon dioxide, nitrogen oxides and suspended particulates) emitted through the exhausts stacks from the boiler; and
- exhaust fumes from site vehicles and machinery.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- cyclonic flow system with inbuilt reticulation on boiler stacks.
- buildings/sheds around areas of the process system where possible;
- automated loggers of on-line opacity on exhaust stacks; and
- 24 hour 7 days a week community liaison telephone line for any community complaints or concerns.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
The Site services manager will visually check air emissions during daily outdoor inspections and undertake appropriate action as required.	Site services manager	Daily
Continuous in-stack monitoring and recording of opacity of stack gases in accordance with sampling method CEM-1 in order to monitor smoke emissions at HPP Site 2 sawmill heat plant stack. The opacity not to exceed 20% (equivalent to Ringlemann 1), except for up to 10 minutes in any 8 hour period for lighting a boiler and blowing soot from a boiler	Site services Manager or delegated representative	Continuous (automated)
Air quality monitoring at the HPP Site 2 sawmill heat plant stack in accordance with the appropriate test method outlined in the *Clean Air (Plant and Equipment) Regulation* 1997, for analysis of: • carbon dioxide using Test Method 24; • carbon monoxide using Other Approved Method 1;	Environmental Consultant or delegated representative	Yearly

- dry gas density using Test Method 23;
- moisture using Test Method 22;
- nitrogen oxides using Test Method 11;
- temperature using Test Method 2;
- total solid particles using Test Method15;
- velocity using Test Method 2; and
- volumetric flow rate using Test Method 2.

The air quality results are not to exceed the statutory requirements. The air quality results to be reported in the annual Environmental Licence Compliance Reporting for EPL No. 11229.

Environmental Monitoring Requirements (EPL 11229)

Site #/EPL	Pollutant	Units	Limit	Notes
HPP 2/11229 Air monitoring requirements.	Carbon Dioxide	%	No Limit	Results reported in annual return to EPA
	Carbon Monoxide	Mg/m3		
	Dry Gas Density	Kg/m3		
	Moisture Content	%		
	Temperature	Degree Celsius		
	Opacity	Continuous		
	Nitrogen Oxides	Mg/m3	2500	
	Total Solid Particulates	Mg/m3	250	

3.7 Noise

Environmental Risks

The potential and actual risks to the environment through excessive noise resulting from site activities include:

- Amenity impacts for the local community, particularly during night-time periods.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- buildings, shed and other surrounds enclosing noisier parts of the process system, particularly the saws, planers and chippers;
- noise barriers and walls surround the majority of the complex to minimise the noise from noise emitters that can not be enclosed, particularly the log yard;
- buffer land around the site to increase the distance from the facility to the nearest community receptor; and
- 24 hour 7 days a week community liaison telephone line for any community complaints or concerns.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Noise monitoring to be conducted at the nearest or most affect residential premises within Oberon, adjacent to the Oberon industrial area, and within the Oberon industrial during the day, evening and night time hours. The noise monitoring to measure both the L_{Aeq} and L_{A10} to satisfy both EPL and Development Approval requirements.	Environmental Consultant or delegated representative	Yearly

Noise Limits

	Location	Noise Level (dBA)		
		Day (7am – 6pm)	Evening (6pm-10pm)	All Other Times
EPL 11229 $L_{Aeq(15\ min)}$	Oorong or any other noise sensitive location (such as residence/school) along Herbourne or West Cunynghame Street, Oberon	55	50	50
DA 403-11-00 L_{A10}	Residential areas within Oberon	46	41	36
	Residential areas adjacent to industrial areas or main roads	51	46	41
	Residences within industrial areas	56	51	46

Environmental Noise Monitoring Locations and Monitoring Frequency

Location	EPL & DA Time Block Description	DA 403-11-00 Limit L_{A10} (dBA)	EPL 11229 Limit L_{Aeq} (dBA)	Frequency
Oorong	Day	51	55	Annually
	Evening	46	50	Annually
	All other	41	50	Annually
				Annually
6 Herborn St	Day	51	55	Annually
	Evening	46	50	Annually
	All other	41	50	Annually
26 Cunynghame St West	Day	51	55	Annually
	Evening	46	50	Annually
	All other	41	50	Annually

3.8 Rehabilitation and Landscaping

Environmental Risks

The site has developed a Landscape Management Plan (LMP) for the management and control of areas that remain vegetated across the site (Appendix H). The potential and actual risks to the environment through lack of effective rehabilitation and landscaping, include:

- emission of dust from poor vegetation cover;
- spread of noxious weeds;
- reduction of natural habitats; and
- reduction in the aesthetics surrounding the site.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following landscaping has been undertaken:

- all suitable areas to be vegetated and landscaped; and
- where suitable, rows of trees and shrubs to be maintained around the perimeter of the site.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Under take watering, mowing, pruning and general maintenance of vegetation and landscaping across the site in accordance with the site LMP.	Ground Staff	As required
Revegetate and/or landscape areas of the site which have been disturbed as soon as possible after works are completed.	Ground Staff	As required

3.9 Traffic Management

Environmental Risks

The potential and actual risks to the environment through traffic associate with the site, include:

- emissions of dust from unsealed roads and uncovered truck loads;
- emissions of exhaust fumes from vehicle exhausts; and
- disruption to residents from traffic movements.

Environmental Management Infrastructure

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- sealing of trafficable areas;

- streamlined traffic management system across the site to minimise traffic congestion particularly from loading and unloading of trucks;
- weigh stations and named entrances to site;
- establishment of Oberon Bypass Roads to ensure trucks don't travel through centre of the township of Oberon; and
- 24 hour 7 days a week community liaison telephone line for any community complaints or concerns.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Ensure truck loads are covered at all times, except during loading and unloading.	Site Services Manager or delegated representative	As required
Personnel operating traffic control gates and weigh bridges to record vehicle movements, load quantities and source/destinations of all trucks entering and leaving the site.	Site Gate Security	As required

3.10 Waste and Materials Management

Environmental Risks

The potential and actual risks to the environment through waste and materials used and generate at the site, include:

- inappropriate storage or transportation of waste and materials, including chemicals leaking or spilling and contaminating environmental receptors such as surface and groundwater.
- inappropriate use of materials including chemicals resulting in contaminating environmental receptors such as surface and groundwater.
- inappropriate disposal of waste and materials contaminating environmental receptors such as surface and groundwater. And
- overuse of primary resources due to a lack of recycling and/or reusing waste and materials;

Environmental Management Infrastructure

The site has developed a detailed Waste Management Plan to manage the generation, control and reduction of wastes across the site and attached as Appendix G.

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- hard stands and bunded areas for the storage of wastes and materials that can potentially impact on the environment;
- appropriate storage and handling vessels for waste and materials in accordance with manufacturers specifications and SDS; and
- designated waste storage areas so process by-products can be used as fuel in heat generation or sold to landscaping supply processors.

Environmental Management Tasks

Environmental Management Task	Responsibility	Frequency
Personnel operating traffic control gates and weigh bridges to record material and waste movements, load quantities and source/destinations of all trucks entering and leaving the site.	Site Gate Security	As required
Inspection of the storage of materials and containment infrastructure focusing on identified dangerous chemicals. Undertake corrective action as required.	Site Services Manager	Monthly
Ensure handling, storage and use of materials and waste in accordance with manufacturers specifications and SDS.	Area Leader	Daily
The Site services Manager in junction with the Production Team and Area Managers to review waste generation, disposal and reuse for the site.	Site services Manager,	Yearly

4.0 References

- ***Contaminated Land Management Act 1997***
- ***Dangerous Goods (Road and Rail Transport) Regulation 2014***
- ***Protection of the Environment Operations (Clean Air) Regulation 2010***
- ***Protection of the Environment Operations (General) Regulation 2009***
- ***Protection of the Environment Operations (Noise Control) Regulation 2017***
- ***Protection of the Environment Operations (Waste) Regulation 2014***
- ***Radiation Control Regulation 2013***
- ***Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulation 2017***
- ***Waste Classification Guidelines 2014***
- ***Environmental Planning and Assessment Act 1979***
- ***Protection of the Environment Operations Act 1997***

Appendix A

HPP Environment Policy

Appendix B

HPP Consent documents

EPL 105

EPL 887

EPL 11229

DA 403-11-00

Radiation Licence #5090038

Appendix C

HPP Environmental Monitoring Points

Appendix D

HPP Community Complaints Protocol

Appendix E

PIRMP HPP site 1, 2 and LOSP Bathurst

Appendix F

HPP Storm Water Management Plan

Appendix G

HPP Waste Management Plan

Appendix H

HPP Landscape Management Plan

APPENDIX C

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) (PUBLIC DOCUMENT)

Highland Pine Products Pty Ltd
ACN 093 059 404
A Joint Venture Company Between
Boral Timber and AKD Softwoods

Pollution Incident Response Management Plan

Public Information

Highland Pine Products NSW Environmental Protection Licences.

- Highland Pine Site 1 – EPL 887
- Highland Pine Site 2 – EPL 11229
- Highland Pine Bathurst – EPL 105

Review Register

Review Date	Review Team	Changes Made (Section)
1. 1/12/18	DM, SK	Update of original document drafted for review.
2. 1/03/19	SK, BG, DK	Approved for website publication
3. 14/5/20	Sk/BG,DK	Reviewed - Updated
4. 13/10/20	SK	Appendices – updated wall chart and protocol docs
5. 27/07/21	SK	Wording/format change. Update appendices.

Contents

Introduction.

This Pollution Incident Response Management Plan (PIRMP) has been developed to conform to requirements as outlined in the Protection of the Environment Operations Act (POEO Act) 1997 and subordinate legislation. This document covers Highland Pine Products (HPP) NSW operations. The plan applies to emergency services, all employees, visitors, contractors and also potentially impacted off site receptors in the event of a pollution incident.

The purpose of this plan is to:

- Detail how the business will assess and respond to a pollution incident to minimize the potential harm to human health and the environment.
- Detail the process to ensure timely reporting of incidents, and
- Detail how the business will notify those within the vicinity of the operations of potential impacts should a pollution incident occur.

HPP NSW Operations.

This plan is applicable to the following Highland Pine Products premises.

Site	Location	Environmental protection licence	Link
Highland Pine Site 1 Oberon	Gate 3 Albion St Oberon	EPL 887	https://apps.epa.nsw.gov.au/prpoeoapp/
Highland Pine Site 2 Oberon	Gate 3 Albion St Oberon	EPL 11229	
Highland Pine Treatment Plant Bathurst	Stuart St Bathurst	EPL 105	

Table 1: HPP Operations in NSW.

Legal Requirements.

Under the Protection of the Environment (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, **key parts of the overall plan must be made available** and easily accessible to the general public via the business website.

This PIRMP must be tested/reviewed within 1 month of a pollution incident and at least once annually. The Act imposes significant penalties for not preparing, keeping on site, maintaining, testing and implementing a PIRMP.

This plan is available electronically and can be accessed via the HPP website or can be viewed in hard copy at Gate 3 Security (24hrs), Albion St Oberon NSW 2787.

Activation of this Plan.

All pollution incidents will be measured against this plan which will be activated when a pollution incident has the potential to cause material harm.

An incident is considered material under s.147 of the POEO Act if;

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it 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
    - the 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.
- It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

The incumbent in the following roles are authorised to activate the PIRMP and notify the required authorities.

- General Manager
- Site Services Manager
- Operations Manager
- Site Lead Team Members.

When an immediate threat to human life or property exists, all personnel are authorised to Dial 000 for emergency services and enact individual site emergency response plans.

Plan Objectives.

The objective of this plan is to;

- Detail methods used to assess main hazards.
- Detail controls that may be implemented to reduce risk of hazards impacting on the receiving environment.
- Describe systems for dealing with pollution incidents.
- Outline incident management structures. And,

- Detail the required review and update process.

Description and Loss Likelihood of Main Hazards.

A survey of potential pollutants on each site has been conducted. This process has identified hazards with potential to impact on the environment which are then assessed using a consequence matrix as detailed in **Table 2.** Potential pollutants with risks scores of Insignificant are not considered main hazards.

Consequences	Risk of Hazard to Environment and/or People				
	Insignificant	**Minor**	**Moderate**	**Major**	**Disastrous**
	No measurable environmental impact. Very low level toxic and not dangerous.	Measurable environmental impact. Mildly toxic or low level dangerous.	Noticeable environmental impact. Toxic and medium level dangerous.	Significant environmental impact. Very toxic and high level dangerous.	Catastrophic environmental impact. Extremely toxic and very dangerous.

Table 2: Consequence Matrix – Main Hazard Identification.

Risk Reduction Controls.

Infrastructure controls have been installed across all sites to reduce the potential for harm to human health and the environment. Where appropriate, administrative controls may also be used and subject to the potential risk several controls may be implemented for a specific hazard. The effectiveness of risk reduction controls (both infrastructure and administrative) have been assessed using the business risk rating matrix.

Types of controls implemented to date are detailed in **Table 3: Infrastructure controls** and **Table 4: Administrative controls.** As new risks are identified and in the event of a loss, controls will be assessed for effectiveness and suitability.

Control	Purpose
Bunding	Act as secondary containment for liquid pollutants. Key control for bulk liquid storage systems.
Sprinkler System	Reduce risk and extent of fires.
Spill Kits	Limit impact of liquid pollutant spills for minor to moderate spill events.
Triple/Single Interceptors	Reduce amount of pollutants discharged from site. Control of gross solids and oils.
First Flush Dams	Reduce amount of solid pollutants discharged from site.
Water Treatment Plant	Reduce amounts of contaminants discharging from site.

Over/Under Interceptors	Reduce amount of solid pollutants discharged from site.
Gate Valves	Contain spills to site for more effective clean up.
Back Flow Prevention Devices	Prevents process water backflow from re-entering town supply.
Fire Hydrants	Reduce risk and extent of fires
Crash Barriers	Protect infrastructure from mobile plant collisions.

Table 3: Infrastructure Controls implemented across HPP's NSW operations.

Control	Purpose
Standard Operating Procedures and Permit to Work System	Provide instruction for proper response to incidents and safe work procedures. Reduces the risk of an incident through operator error/lack of understanding.
Housekeeping Inspections	Identify risks, highlights failures in process and recommend corrective actions.
Walkaround check-sheets	Identifies and reports on potential plant failures that could impact on the environment if not addressed.
Preventative maintenance program	Routine maintenance of plant where failures impacting on the environment and productivity have been known to occur.
Audits	Identify risks and recommend corrective actions.
Incident/Hazard/Near Miss Reporting	Identify risks and recommend corrective actions. Identify training, work procedure and infrastructure improvement requirements. Essential to continual improvement.
Environmental Monitoring	Comply with license conditions. Monitor performance.
Change Management	Reduce risk posed by changes to process.
Emergency Plan	Reduce impact of emergencies on environment and business continuity. Reduce risks to human health/Safety.
Induction Training	Alert all employees and visitors to their environmental responsibilities.

Table 4: Administrative Controls implemented across HPP's NSW Operations.

Procedure for Internal and External Incident Reporting.

All incidents must be reported and investigated. Protocols have been developed to provide guidance on the level of environmental reporting as required under the POEO Act and Regulations. Complying with the PIRMP notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW.

Internal Incident Reporting.

All incidents, hazards and near misses must be reported under well-established reporting procedures utilizing a risk matrix. This provides all internal stakeholders with information regarding severity of a risk or incident and details corrective actions

required. These procedures include a review system to ensure all corrective actions are completed.

External Incident Reporting.

The HPP incident notification procedure has been developed to provide specific direction for site-based personnel in the event of a loss of containment. Training to ensure each level of the business understands its obligations with regard to notification is completed annually and also forms part of the review process in the event the plan is activated.

The process involves the use of a wall chart (**Appendix1**) notification assessment worksheet (**Appendix 2**) and notification protocol (**Appendix 3**).

The procedure and associated documentation provide clear guidelines for reporting to external parties and was developed to comply with the POEO Act and regulations.

Mechanisms for providing early warnings and updates to Neighbours.

If an incident has occurred that requires first response emergency services, all communication to external parties will be managed by the person authorised to activate the plan. Each site and incident will require a unique response regarding communication with residents adjacent to the site and subject to the incident, the following mechanisms may be used.

- Notification on website
- Twitter
- Facebook
- Telephone calls
- SMS
- Email to community representatives e.g. consultative committee.
- Letter box drops for updates.
- Door knock.
- Town meetings for updates.

Initial communication with neighbours will be completed in consultation with emergency service advice and directives such as evacuation.

Manner in which plan will be tested and maintained.

This PIRMP requires scheduled testing and maintenance to ensure the process remains current and incident response/notification is completed without delay. As a minimum, the following summary details the review requirements for this plan.

- Review at least once every 12 months and after every incident.
    - Record annual review in Routine Activities of Site EHSR Improvement Plan.
    - Senior management sign off is required for annual review.
- Spill response training and drills every 12 months.
- Provide relevant training on regular basis.
- Amend this PIRMP and record details in Amendment Register.

Task	Who	Frequency
Full review of plan including chemical risk assessment. Review must be documented.	Site EHSR, Engineering Dept, Production Dept. Site Manager	Annual
Post incident plan review.	Site EHSR, Engineering Dept, Production Dept. Site Manager	Within 30 days of this plan being activated.
Spill response training drills	All shop floor personnel	Annually
PIRMP responsibility training	All site personnel	Annually
PIRMP review signoff	Site Manager, Site EHSR	Annually
Amend register and update records	Site EHSR	Annually or as updates occur.

Table 5: PIRMP Testing and maintenance.

Appendix 1: Pollution Incident Response Loss of Containment Wallchart

LOSS OF CONTAINMENT INCIDENT

SHOPFLOOR

- CALL/TELL SUPERVISOR
- IF SAFE, ISOLATE AND CONTAIN.

SUPERVISOR

1. REFER TO LOSS OF CONTAINMENT SOP
2. PROMPTLY ASSESS CONSEQUENCES OF INCIDENT USING MATRIX BELOW.

CONSEQUENCE

CATEGORY OF HARM	INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS
HEALTH & SAFETY	• Temporary discomfort or pain	• First aid treatment	• Medical treatment • Lost work time	• Serious injury • Hospital required	• Fatality
ENVIRONMENT	• Impact contained to site with simple clean-up. • Spill into Bund less than 50 L	• Impact contained to site requiring specialist clean-up • Spill greater than 50 L	• Impact not contained to site with simple clean-up • Chemical Spill (any volume) outside bund.	• Local impact • Specialist clean-up required	• Regional or national impact • Long term damage
BUSINESS CONTINUITY	• No impact on customer	• Minor customer impact (e.g. late delivery)	• Damage to non-critical process • Customer suffers a loss	• Loss of key processes • Structural damage • Loss of key supplier or customer	• Loss of site • Long term loss of market share
REPUTATION	• Public concern limited to individuals	• Local community concern, political enquiry or media coverage	• Regional public concern, political enquiry or media coverage	• National public concern, political enquiry or media coverage	• International concern, political enquiry or media coverage
REGULATORY COMPLIANCE	•No requirement to report to authority	•Mandatory reporting authority unlikely to take action	•Informal warning	•Formal warning or on the spot fine •Litigation/ prosecution possible	•Litigation/ prosecution likely

Call HPP Contact List in Order Until Someone Answers

(Site Services) – 0408 XXX XXX
(General Manager) – 0459 XXX XXX
(EHSR) – 0427 XXX XXX
(Operations Manager) – 0419 XXX XXX
(Green Mill Manager) – 0438 XXX XXX
(Environment) – 0418 XXX XXX
(Dry Mill Manager) – 0438 XXX XXX
(Maint Manager) – 0400 XXX XXX
(Logistics Manager) – 0412 XXX XXX

Call Emergency Services 000

REFER TO LOSS OF CONTAINMENT SOP

COMPLETE INCIDENT REPORT

Appendix 2: Notification Assessment Worksheet.

NOTIFICATION ASSESSMENT

Date		Time		Name		Incident Report Number	
Description of Incident							

CONSEQUENCE (TICK THE BOX)

CATEGORY OF HARM	INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS
HEALTH & SAFETY	• Temporary discomfort or pain ☐	• First aid treatment ☐	• Medical treatment • Lost work time ☐	• Serious injury • Hospital required ☐	• Fatality ☐
ENVIRONMENT	• Impact contained to site with simple clean-up • Spill into a bund less than 50 L ☐	• Impact contained to site requiring specialist clean-up. • Spill greater than 50 litres ☐	• Impact not contained to site requiring simple clean-up • Chemical spill (any volume) outside bund. ☐	• Local impact • Specialist clean-up required ☐	• Regional or national impact • Long term damage ☐
BUSINESS CONTINUITY	• No impact on customer ☐	• Minor customer impact (e.g. late delivery) ☐	• Damage to non-critical process • Customer suffers a loss ☐	• Loss of key processes • Structural damage • Loss of key supplier or customer ☐	• Loss of site • Long term loss of market share ☐
REPUTATION	• Public concern limited to individuals ☐	• Local community concern, political enquiry or media coverage ☐	• Regional public concern, political enquiry or media coverage ☐	• National public concern, political enquiry or media coverage ☐	• International concern, political enquiry or media coverage ☐
REGULATORY COMPLIANCE	•No requirement to report to authority ☐	•Mandatory reporting authority unlikely to take action ☐	•Informal warning ☐	•Formal warning or on the spot fine •Litigation/ prosecution possible ☐	•Litigation/ prosecution likely ☐

FILL IN THE WHITE BOXES				
Cost of material lost				Estimated Cost $
Oil (any type)	L	X	$10.00/L	
Liquid wastes (Non-H2)	L	X	$10.00/L	
H2 Liquid Wastes	L	X	$200.00/L	
Boiler Chemicals	L	X	$20.00/L	
Fuel	L	X	$10.00/L	
Chip/dust	T	X	$105.00/T	
Waste Water	L	X	$10.00/L	
H2 Treatment Chems	L	X	$200.00/L	
What critical process went down?				
Hrs	Down	X	$1250	
What non-critical process went down?				
Hrs	Down	X	$250	
Clean up				
Hrs	X	Men	X $50	
Sucker truck		Hrs	X $180	
spill kits x $700			half kits x $350	
Waste disposal				
Tip fees	M3		X $100	
Special disposal	T		X $200	
Waste testing	1		X $500	
			Total Cost =	

CALLS MADE CHECKLIST (FILL IN THE WHITE BOXES)		
AUTHORITY	CALLED	REFERENCE NO.
No call necessary	☐	NA
Emergency Services 000	☐	
Fire & Rescue NSW	☐	
EPA	☐	
Health Department	☐	
Safework NSW	☐	
Local Council	☐	

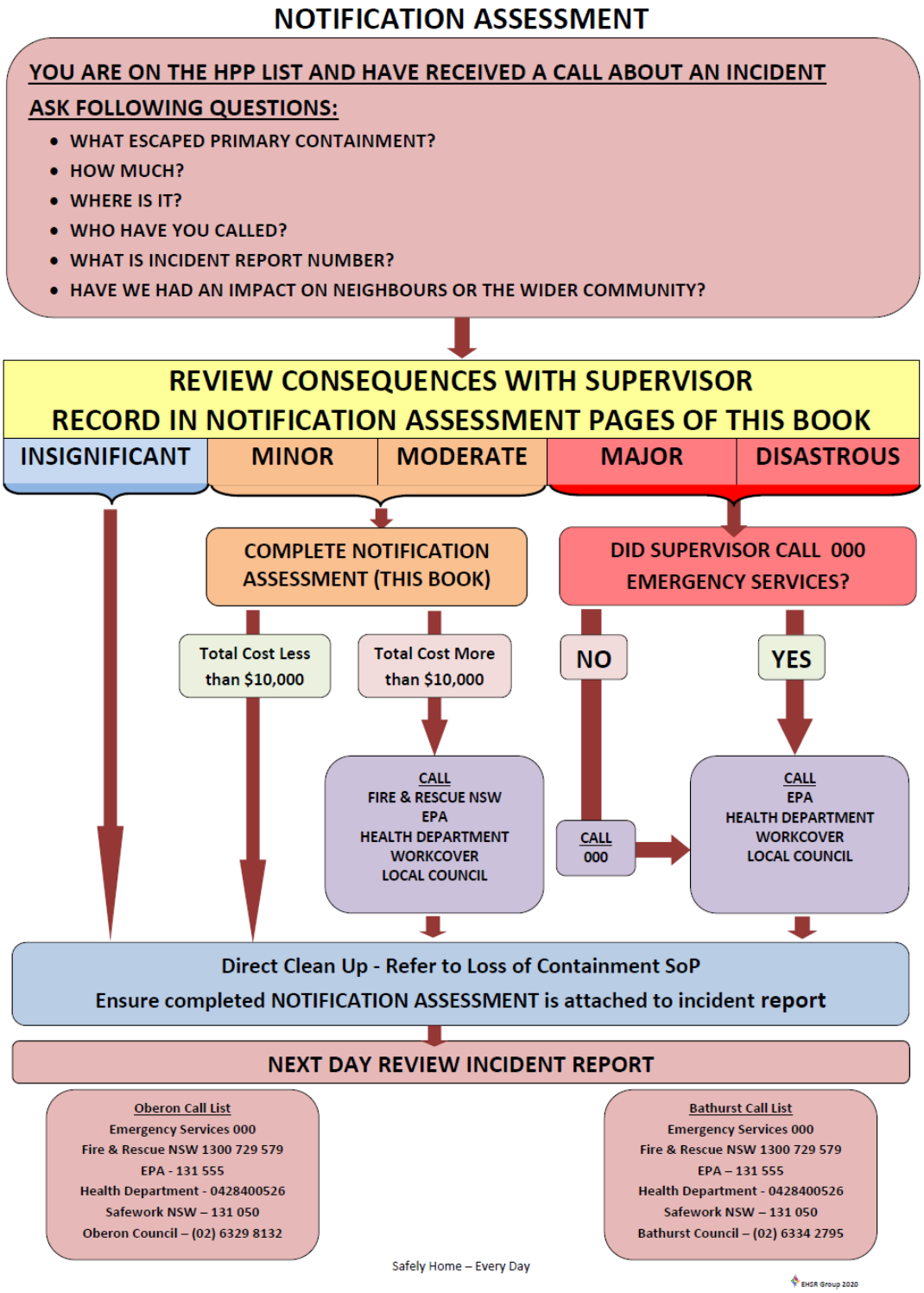
WHAT TO TELL AUTHORITIES (KEEP TO THE FACTS)

- Time
- Date
- Location – site address
- Environment Protection Licence Number (EPL)
- Nature of Issue – fire, spill etc
- Quantity of material lost
- Other relevant information known at the time.

EPL Numbers
HPP1 – 887 HPP2 – 11229 LOSP – 105

This estimation tool provides guidance when assessing potential cost of an incident.	Signed:

Appendix 3: Notification Assessment Protocol.



APPENDIX D

ANNUAL RETURN EPL 11229

Annual Return

HIGHLAND PINE PRODUCTS PTY LIMITED

Licence 11229

A. Statement of Compliance - Licence Details

ALL Licence holders must check that the Licence details in Section A are correct.

If there are changes to any of these details, **you must advise Environment Protection Authority (EPA) and apply as soon as possible for a variation to your Licence or for a Licence transfer.**

Licence variation and transfer application forms are available on the EPA website at: http://www.epa.nsw.gov.au/licensing-and-regulation/licensing or from regional offices of the EPA, or by contacting by telephone 02 9995 5700.

If you are applying to vary or transfer your Licence, you must still complete and submit this Annual Return.

A1. Licence holder

Licence number	: 11229
Licence holder	: HIGHLAND PINE PRODUCTS PTY LIMITED
Trading name *(if applicable)*	:
ABN	: 81 093 059 404
ACN	: 093 059 404
Reporting period	: From: 13-8-2020 To: 12-8-2021

A2. Premises to which Licence Applies (if applicable)

Common name (if any)	: HIGHLAND PINE PRODUCTS
Premises	: GATE 3, ALBION STREET OBERON 2787 NSW

A3. Activities to which Licence Applies

Wood or timber milling or processing

Wood preservation

A4. Other Activities (if applicable)

A5. Fee-Based Activity Classifications

Note that the fee based activity classification is used to calculate the administrative fee.

Fee-based activity	Activity scale	Unit of measure
Wood preservation	> 30,000.00	m3 annual processing capacity
Wood or timber milling or processing	> 200,000.00	m3 annual processing capacity

A6. Assessable Pollutants (if applicable)

Note that the identification of assessable pollutants is used to calculate the **load-based fee.**
The following assessable pollutants are identified for the fee-based activity classifications in the licence:

B. Monitoring and Complaints Summary

B1. Number of Pollution Complaints

Pollution Complaint Category	Complaints
Air	1
Water	0
Noise	0
Waste	0
Other	0
Total complaints recorded by the licensee during the reporting period	**1**

B2. Concentration Monitoring Summary

For each concentration monitoring point identified in your licence, details are displayed below. If concentration monitoring is not required by your licence, **no data** will appear below.
If data was provided from an uploaded file, the file name will be displayed below instead of any data.
Note that this does not exclude the need to conduct appropriate concentration monitoring of assessable pollutants as required by load-based licensing (if applicable).

Discharge & Monitoring Point 1

Discharge to Air; Air emissions monitoring, Point 7, sawmill heat plant stack from sawmill site air emission plan 21/6/00.

Pollutant	Unit of measure	No. of samples required	No. of samples collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Carbon dioxide	percent	1	1	7.6	11.9	15.5
Carbon monoxide	milligrams per cubic metre	1	1	320	640	1900
Dry gas density	kilograms per cubic metre	1	1	1.36	1.36	1.36
Moisture	percent	1	1	11	11	11
Nitrogen Oxides	milligrams per cubic metre	1	1	65	100	160

Opacity	percent Opacity	continuous	continuous	12	31.12	100
Temperature	degrees Celsius	1	1	281	281	281
Total Solid Particles	milligrams per cubic metre	1	1	220	220	220
Velocity	metres per second	1	1	9.5	9.5	9.5
Volumetric flowrate	cubic metres per second	1	1	12	12	12

Monitoring Point 5

Groundwater quality monitoring, Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 1" marked on fax from HPP dated 22 January 2004.

Pollutant	Unit of measure	No. of samples required	No. of samples collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Biochemical oxygen demand	milligrams per litre	2	2	2	2	2
Conductivity	microsiemens per centimetre	2	2	167	176	184
Depth	metres	2	2	3.05	3.075	3.1
Nitrate	milligrams per litre	2	2	8.99	9.15	9.29
pH	pH	2	2	5.19	5.32	5.46
Total dissolved solids	milligrams per litre	2	2	111	114.5	118
Total organic carbon	milligrams per litre	2	2	3	4.5	6

Monitoring Point 6

Groundwater quality monitoring, Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 3" marked on fax from HPP dated 22 January 2004.

Pollutant	Unit of measure	No. of samples required	No. of samples collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Biochemical oxygen demand	milligrams per litre	2	2	2	2	2
Conductivity	microsiemens per centimetre	2	2	162	171.5	181
Depth	metres	2	2	1.1	1.15	1.19

Nitrate	milligrams per litre	2	2	1.4	1.61	1.82
pH	pH	2	2	5.64	5.67	5.70
Total dissolved solids	milligrams per litre	2	2	95	102.5	110
Total organic carbon	milligrams per litre	2	2	1	1	1

B2 Concentration Monitoring Comments

Although monitoring was completed as per the EPL requirements, a fault has been identified in opacity metering equipment for the period May- August 2021 resulting in higher readings being recorded than actual.

B3. Volume or Mass Monitoring Summary

For each volume or mass monitoring point identified in your licence, details are displayed below. If volume or mass monitoring is not required by your licence, **no data** will appear below.
If data was provided from an uploaded file, the file name will be displayed below instead of any data.
Note that this does not exclude the need to conduct appropriate volume or mass monitoring of assessable pollutants are required by load-based licensing (if applicable).

C. Statement of Compliance - Licence Conditions

C1. Compliance with Licence Conditions

Were all conditions of the licence complied with (including monitoring and reporting requirements)?	**Yes**

D. Statement of Compliance - Load Based Fee Calculation

If you are not required to monitor assessable pollutants by your licence, **no data** will appear below.

If assessable pollutants have been identified on your licence, the following worksheets for each assessable pollutant will determine your load based fee for the licence fee period to which this Annual Return relates.

Loads of assessable pollutants must be calculated using any of the methods provided in EPA's Load Calculation Protocol for the relevant activity. A Load Calculation Protocol would have been already sent to you with your licence. If you require additional copies, you can download the Protocol from the EPA's website or you can contact us on telephone 02 9995 5700.

You are required to keep all records used to calculate licence fees for four years after the licence fee was paid or became payable, whichever is the later date.

E. Statement of Compliance - Requirement to Prepare PIRMP

Have you prepared a Pollution Incident Response Management Plan (PIRMP) as required under section 153A of the Protection of the Environment Operations (POEO) Act 1997?	**Yes**
Is the PIRMP available at the premises?	**Yes**
Is the PIRMP available in a prominent position on a publicly accessible website?	**Yes**
Address of the web page where the PIRMP can be accessed ▼	
https://highlandpine.com.au/environmental-monitoring-data/	
Has the PIRMP been tested?	**Yes**
The PIRMP was last tested on	**20-7-2021**
Has the PIRMP been updated?	**Yes**
The PIRMP was last updated on	**27-7-2021**
Number of times the PIRMP was activated in this reporting period?	**1**
The PIRMP was activated on	**29/11/20**

F. Statement of Compliance - Requirement to Publish Pollution Monitoring Data

Are there any conditions attached to your licence that require pollution monitoring to be undertaken as required under section 66(6) of the Protection of the Environment Operations (POEO) Act 1997?	**Yes**
Do you operate a website?	**Yes**
Is the pollution monitoring data published on your website in accordance with the EPA's written requirements for publishing pollution monitoring data?	**Yes**
Address of the web page where the pollution monitoring data can be accessed ▼	
https://highlandpine.com.au/environmental-monitoring-data/	

G. Statement of Compliance - Environment Management System and Practices

Do you have an ISO 14001 certified Environmental Management System (EMS) OR any other system that EPA considers is equivalent to the accountability, procedures, documentation and record keeping requirements of an ISO 14001 certified EMS?	**No**
Have you conducted an assessment of your activities and operations to identify the aspects that have a potential to cause environmental impacts and implemented operational controls to address these aspects?	**Yes**
Have you established and implemented an operational maintenance program, including preventative maintenance?	**Yes**
Do you keep records of regular inspections and maintenance of plant and equipment?	**Yes**

Do you conduct regular (at least yearly) environmental audits at the premises that are conducted by a competent and independent person?	**Yes**
Have you undertaken an independent environmental audit covering documented environmental practices, procedures and systems in place during the annual return period?	**No**
Have you established and implemented an environmental improvement or management plan?	**Yes**
Do you train staff in environmental issues that may arise from your activities and operations at the premises and keep records of this?	**Yes**

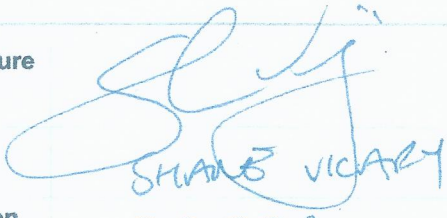
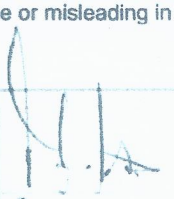
H. Signature and Certification

This Annual Return may only be signed by person(s) with legal authority to sign it as set out in following categories: an Individual, a Company, a Public authority or a Local council.

It is an offence under section 66 of the Protection of the Environment Operations Act 1997 to supply any information in this form that is false or misleading in a material respect, or to certify a statement that is false or misleading in a material respect. There is a maximum penalty of $250,000 for a corporation and $120,000 for an individual.

I/We

- declare that the information in the Monitoring and Complaints Summary in Section B of this Annual Return application is correct and not false or misleading in a material respect, and
- certify that the information in the Statement and Compliance in sections A, C, D, E, F, G and H and any other pages attached to Section C is correct and not false or misleading in a material respect.

Signature		**Signature**	
Name	SHANE VICARY	**Name**	PAUL CUTTEN
Position	DIRECTOR	**Position**	DIRECTOR
Date	28 / 9 / 2024	**Date**	28 / 9 / 24

Declaration	Declaration
I declare that the information in the Monitoring and Complaints Summary in section B of this Annual Return is correct and not false or misleading in a material respect, and I certify that the information in the Statement of Compliance in section A,C,D,E,F and G and any pages attached to Section C is correct and not false or misleading in a material respect.	I declare that the information in the Monitoring and Complaints Summary in section B of this Annual Return is correct and not false or misleading in a material respect, and I certify that the information in the Statement of Compliance in section A,C,D,E,F and G and any pages attached to Section C is correct and not false or misleading in a material respect.

APPENDIX E

ENVIRONMENTAL PROTECTION LICENCE (EPL) 11229

Environment Protection Licence

Licence - 11229

Licence Details	
Number:	11229
Anniversary Date:	13-August

Licensee
HIGHLAND PINE PRODUCTS PTY LIMITED
LOCKED BAG 8
OBERON NSW 2787

Premises
HIGHLAND PINE PRODUCTS
GATE 3, ALBION STREET
OBERON NSW 2787

Scheduled Activity
Wood or timber milling or processing
Wood preservation

Fee Based Activity	Scale
Wood or timber milling or processing	> 200000 m3 annual processing capacity
Wood preservation	> 30000 m3 annual processing capacity

Region
Regional South - Bathurst
L102, 346 PANORAMA AVENUE BATHURST NSW 2795
Phone: (02) 6333 3800
Fax: (02) 6333 3809
PO Box 1388
BATHURST NSW 2795

Environment Protection Licence

Licence - 11229

Environment Protection Licence

Licence - 11229

Environment Protection Licence

Licence - 11229

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Environment Protection Licence

The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

HIGHLAND PINE PRODUCTS PTY LIMITED
LOCKED BAG 8
OBERON NSW 2787

subject to the conditions which follow.

Environment Protection Licence

Licence - 11229

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Wood or timber milling or processing	Wood or timber milling or processing	> 200000 m3 annual processing capacity
Wood preservation	Wood preservation	> 30000 m3 annual processing capacity

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
HIGHLAND PINE PRODUCTS
GATE 3, ALBION STREET
OBERON
NSW 2787
LOT 86 DP 574012, LOT 10 DP 1017456, LOT 1 DP 1047220

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

A3.2 Notwithstanding condition A3.1, works and activities carried out by the licensee for the Bifenthrin treatment plant must be carried out in accordance with;
a) Licence variation form dated 17 March 2010 and supporting documentation.
b) The requirements of Australian/New Zealand Standard, timber preservation plant safety code, Part 1: Plant design – AS/NZS 2843.1:2000.

c) The requirements of Australian/New Zealand Standard, timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000.

2 Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

P1.1 The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Air

EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
1	Discharge to Air; Air emissions monitoring	Discharge to Air; Air emissions monitoring	Point 7, sawmill heat plant stack from sawmill site air emission plan 21/6/00.
7	Air Emission - Wood preservation	Air Emission - Wood preservation	Air emission point from bifenthrin treatment plant labelled as point No.23 on drawing titled HPP39702 termite repellant project emission point layout dated 5/3/2010 submitted to EPA on 17/3/2010.
8	Air emission - Wood preservation	Air emission - Wood preservation	Air emission point from bifenthrin treatment plant labelled as point No.24 on drawing titled HPP39702 termite repellant project emission point layout dated 5/3/2010 submitted to EPA on 17/3/2010.

P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

Water and land

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
5	Groundwater quality monitoring		Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 1" marked on fax from HPP dated 22 January 2004.
6	Groundwater quality monitoring		Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 3" marked on fax from HPP dated 22 January 2004.

3 Limit Conditions

Environment Protection Licence

Licence - 11229

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L1.2 In accordance with the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035, the licensee may discharge all stormwater and wastewater generated from the premises untreated to the adjoining licensed premises 3035 for treatment.

L1.3 The licensee must advise the EPA of any changes to the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035, at the time the agreement is changed including termination of the agreement.

L2 Concentration limits

L2.1 For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.

L2.2 Air Concentration Limits

POINT 1

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Total Solid Particles	milligrams per cubic metre	250			
Nitrogen Oxides	milligrams per cubic metre	2500			

L3 Waste

L3.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	General or Specific exempted waste	Waste that meets all the requirements of a	As specified in each particular resource	NA

	resource recovery order and exemption under the Protection of the Environment Operations (Waste) Regulation, as in-force from time to time	recovery exemption

L4 Noise limits

L4.1 Noise from the premises must not exceed:
a) 55 dB(A) $L_{Aeq(15\ minute)}$ during the day (7am to 6pm); and
b) 50 dB(A) $L_{Aeq(15\ minute)}$ during the evening (6pm to 10pm); and
c) at all other times 50 dB(A) $L_{Aeq\ (15\ minute)}$, except as expressly provided by this licence.

Where L_{Aeq} means the equivalent continuous noise level – the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.

L4.2 To determine compliance with condition L4.1 noise must be measured at, or computed for, at "Oorong" or an other noise sensitive location (such as a residence/school) along Herbourne or West Cunynghame Street, Oberon. A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the "Environmental Noise Management - NSW Industrial Noise Policy (January 2000)".

L4.3 The noise emission limits identified in this licence apply under all meteorological conditions except:
a) during rain and wind speeds (at 10m height) greater than 3m/s; and
b) under "non-significant weather conditions".

Note Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.

L4.4 The noise limits in the above table do not apply where the licensee and an affected resident have reached a negotiated agreement in regard to noise.

4 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and

b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.

O3.2 Trucks entering and leaving the premises that are carrying loads of material likely to blow off must be covered at all times, except during loading and unloading.

O4 Processes and management

O4.1 The bifenthrin treatment facility must be operated in accordance with the requirements of Australian/New Zealand Standard, Timber preservation plant safety code, Part 1: Plant design – AS/NZS 2843.1:2000, and Australian/New Zealand Standard, Timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000, except as expressly provided by a condition of this licence.

5 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Requirement to monitor concentration of pollutants discharged

M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

M2.2 Air Monitoring Requirements

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POINT 1

Pollutant	Units of measure	Frequency	Sampling Method
Carbon dioxide	percent	Yearly	TM-24
Carbon monoxide	milligrams per cubic metre	Yearly	TM-32
Dry gas density	kilograms per cubic metre	Yearly	TM-23
Moisture	percent	Yearly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Opacity	percent Opacity	Continuous	CEM-1
Temperature	degrees Celsius	Yearly	TM-2
Total Solid Particles	milligrams per cubic metre	Yearly	TM-15
Velocity	metres per second	Yearly	TM-2
Volumetric flowrate	cubic metres per second	Yearly	TM-2

M2.3 Water and/ or Land Monitoring Requirements

POINT 5

Pollutant	Units of measure	Frequency	Sampling Method
Biochemical oxygen demand	milligrams per litre	Every 6 months	Grab sample
Conductivity	microsiemens per centimetre	Every 6 months	Grab sample
Depth	metres	Every 6 months	In situ
Nitrate	milligrams per litre	Every 6 months	Grab sample
pH	pH	Every 6 months	Grab sample
Total dissolved solids	milligrams per litre	Every 6 months	Grab sample
Total organic carbon	milligrams per litre	Every 6 months	Grab sample

POINT 6

Pollutant	Units of measure	Frequency	Sampling Method
Biochemical oxygen demand	milligrams per litre	Every 6 months	Grab sample
Conductivity	microsiemens per centimetre	Every 6 months	Grab sample
Depth	metres	Every 6 months	In situ
Nitrate	milligrams per litre	Every 6 months	Grab sample
pH	pH	Every 6 months	Grab sample
Total dissolved solids	milligrams per litre	Every 6 months	Grab sample
Total organic carbon	milligrams per litre	Every 6 months	Grab sample

Note: Special Method 1 means assessing and recording the opacity of emissions using Ringelmann Chart.

M3 Testing methods - concentration limits

M3.1 Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:
a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or
b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or
c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.

Note: The *Protection of the Environment Operations (Clean Air) Regulation 2010* requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".

M3.2 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

M4 Recording of pollution complaints

M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M4.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.

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M5 Telephone complaints line

M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M5.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

M6 Other monitoring and recording conditions

M6.1 Noise monitoring to determine compliance with condition L4 must be carried out at least once annually during the day, evening, and night time hours specified by condition L4.1 at the locations specified under condition L4.2. The 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 Industrial Noise Policy.

6 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

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Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;

c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

7 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

8 Pollution Studies and Reduction Programs

U1 Long Term Noise Reduction - Implement long term options

U1.1 The licensee must by 30 November 2023 report on completion of the long term noise attenuation actions (1-9 years) of Table 1. The report must include, but not necessarily limited to:

- details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long term options for attenuation by location (Table 1. 30Jun13), or any subsequent revision from mid-term reporting.
- details of noise reduction(s) achieved from various sources (locations) within the premises.
- details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations.
- any changes proposed to options of attenuation to ensure noise emissions from premises can comply with 45 dB(A) LAeq (15 minute) noise limit by 30 December 2023.

By 30 December 2023, the licence must achieve a 5 dB(A) noise reduction from the premises as after 1 January 2024 the EPA will be amending the night time noise limit of licence 11229 by 5 dB(A) to 45 dB(A) LAeq (15 minute).

Background to Long Term Noise Reduction Program

Note: Consistent with developing a long term continuous noise improvement program for the Highland Pine Products (HPP) sawmill, the licensee completed and submitted to the EPA the following reports;
1) a Survey of Occupational Noise Exposures in Green and Planer Mills (report) by Knox OHS Solutions March 2013 and
2) Table 1: HPP Noise assessment. Short term and long term options for attenuation by location (Table 1 - 30 Jun 13).

By the above conditions U1 the EPA requires the licensee to implement a long term noise improvement program for the HPP sawmill to achieve a 5 dB(A) reduction in noise from the premises within 10 years to be able to meet a night time noise limit of 45 dB(A) LA eq (15 minute).

As the improvement program is for 10 years and HPP Noise Assessment (Table 1) represents "potential" attenuation options at the time of preparation, the licensee is not bound to follow the short-mid-long term works identified for each location under Table 1. The licensee should however use Table 1 as a guide to the implementation and reporting of improvement works (what's been achieved at each interval and what's proposed for the next interval), towards achieving an overall 5 dB(A) noise reduction at the end of the 10 year program.

The short-mid-long term approach to noise attenuation in Table 1 is the basis for the 3 Long term Noise Reduction PRP's (condition U1). The licensee may however revise Table 1 at any time provided the revised Table 1 with a date of revision and revision number is provided to the EPA.

9 Special Conditions

E1 Ongoing Noise Reduction

E1.1 The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction. To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement. The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M6.1, in a report to be provided to the EPA within three months of the conclusion of each reporting period for the premises.

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Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

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flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

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TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste

Mr Darryl Clift

Environment Protection Authority

(By Delegation)

Date of this edition: 13-August-2001

Environment Protection Licence

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End Notes

1	Licence transferred through application 140715, approved on 28-Aug-2001, which came into effect on 28-Aug-2001.
2	Licence varied by notice 1015795, issued on 19-Apr-2002, which came into effect on 14-May-2002.
3	Licence varied by notice 1031224, issued on 20-Sep-2004, which came into effect on 15-Oct-2004.
4	Licence varied by notice 1050871, issued on 08-Sep-2005, which came into effect on 03-Oct-2005.
5	Licence varied by notice 1068743, issued on 15-Jan-2007, which came into effect on 15-Jan-2007.
6	Licence varied by notice 1074663, issued on 29-Apr-2008, which came into effect on 29-Apr-2008.
7	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
8	Licence varied by notice 1112186, issued on 15-Apr-2010, which came into effect on 15-Apr-2010.
9	Licence varied by notice 1504742 issued on 26-Mar-2012
10	Licence varied by notice 1510007 issued on 08-Jan-2013
11	Licence varied by notice 1521066 issued on 01-Sep-2014
12	Licence varied by notice 1542425 issued on 19-Jul-2016
13	Licence varied by notice 1554004 issued on 03-Aug-2017
14	Licence varied by notice 1567059 issued on 13-Jul-2018
15	Licence varied by notice 1567184 issued on 20-Jul-2018
16	Licence varied by notice 1572581 issued on 19-Nov-2018
17	Licence varied by notice 1578420 issued on 11-Apr-2019
18	Licence varied by notice 1597013 issued on 17-Feb-2021

APPENDIX F

STORMWATER MANAGEMENT PLAN

Highland Pine Products Pty Ltd
ACN 093 059 404
A Joint Venture Company Between
Boral Timber and AKD Softwoods

Highland Pine Products.

Storm Water Management Plan

2021-2023

Stormwater Management Plan Document Control

This Stormwater Management Plan (SWMP) for Highland Pine Products (HPP), Oberon is a controlled document.

This copy has been issued to:

Controlled Copy No.:
Position:
Current Incumbent:

Controlled copies of this SWMP are held by the personnel described in the following table:

Controlled Copy Distribution

Controlled Copy No.	Position	Current Incumbent
1	EHSR Advisor	Wendy Lindsay
2	General Manager	Mike Bitzer
3	Site Services Manager	Ben Gawehn
4	Environmental Consultant	Spiro Kavalieros

Controlled copies must be approved by the General Manager before issue.

Prior to being issued, any proposed amendments to this SWMP must be approved by the General Manager following consultation with the Site Services Managers.

Amendments made to this SWMP shall be distributed by the General Manager to the holder of each controlled copy of the SWMP. The holder of each controlled copy is responsible for ensuring that the amended pages are updated in their controlled copy.

Stormwater Management Plan Amendment Register

Subsequent to the finalisation of the initial SWMP for Highland Pine Products (HPP) Oberon, the following Amendment/Review/Updates have been undertaken.

Review Date	Review Team	Changes Made (Section)
1. Dec 2014	SK, BG	Update historical document. All sections updated
2. Dec 2016	PS, BG	Minor updates/review
3. Dec 2018	SK, BG	Doc rewrite. Update due to changes to ownership.
4. Jan 2020	SK	General review and update
5. Jan 2021	SK – Circulated to SSM, H&S and GM for comment	Full review – Updated
6. April 2021	SK – Circulated to MB, BG and WL for comment.	Updated table 3 sediment classification/disposal.

Contents

INTRODUCTION

The purpose of this plan is to document processes and procedures implemented by Highland Pine Products (HPP) with regard to storm water management at its two manufacturing facilities at Oberon NSW. Historically this plan considered the integrated stormwater system including impacts by adjacent facilities on stormwater quality. A 2018 change of ownership has necessitated the need to update this document to consider impacts from the HPP site 1 (HPP1) and Site 2 (HPP2) facilities only.

Broadly, this plan documents the required management and controls for a number of potential impacts to storm water across the complex being;

- Historical contamination of Organochlorine pesticides (OCP's);
- Impact of spills;
- Sediment (unsealed surfaces) and wood fibre.
- Use of termiticide in the solid wood treatment process; and
- Large volume of fuels and oils used across the complex.

All of the above have the potential to negatively impact on sensitive aquatic ecosystems found in the receiving environment.

BACKGROUND

In 2008, then owners (Carter Holt Harvey (CHH)) entered into an agreement with the DECC (now the NSW EPA) to complete a remediation action plan (RAP) across the Oberon Timber Complex. After numerous investigations over the previous 10 years, historical Organo-Chlorine Pesticide (OCP) contamination was found in drainage line sediments and at discreet locations.

A Remediation Action Plan (RAP) was developed to control and prevent the mobilization of major sediment sources impacted with the pesticides Aldrin and Dieldrin, and to contain potentially impacted soils and sediments in-situ under concrete capping. Aldrin was used in the manufacture of particleboard prior to the 1970's to protect it from termite infestation.

This Remediation Action Plan was approved for implementation in 2010 and completed in early 2011. The objectives of the plan were to;

- remove contaminated material above a certain threshold.
- Cap known contamination "hot spots" under concrete to prevent human exposure or any further contamination of storm water.
- Implement processes to ensure future work completed on the site does not result in further migration of contamination.
- Remove underground services from known impacted areas to eliminate the need for future excavation.

To prevent surface water from potentially mobilizing any remaining contaminants, specific areas on the HPP2 site where contamination was potentially located have been covered with concrete. Areas covered included around the HPP2 Planermill baghouse and the main stormwater channel reaches 1 and 2. No remediation or capping was undertaken at HPP1.

LEGAL REQUIREMENTS

The *Protection of the Environment Operations* Act 1997 is the key piece of environmental protection legislation administered by the New South Wales Environment Protection Agency (NSWEPA) to authorize the undertaking of scheduled activities in NSW.

Under this legislation Highland Pine Products site 1 & 2 are issued with an Environmental Protection License (EPL) to operate subject to satisfying the various conditions which include emissions to air and water, waste disposal and requirements for monitoring and reporting. The Highland Pine Products Site 1 and 2 EPL's are attached as **Appendix 1**.

OBJECTIVES AND PERFORMANCE OUTCOMES

The following objectives and performance outcomes for stormwater management on the sites are provided in **Table 1: Objectives and performance outcomes**.

Objectives	Performance outcomes
Comply with all statutory requirements.	All stormwater flowing from site meets license limits where required.
Ensure all monitoring is undertaken in accordance with requirements of this SWMP.	All monitoring undertaken at specified frequency and results reported.
Ensure integrity of concrete drains and shotcrete remains intact.	Vehicular access to certain areas restricted, damage repaired ASAP, no vehicular movements on shotcrete areas.
Maintain controls to ensure stormwater quality objectives are met.	Compliance with license limits.
Reduce impacts through the better management of risk	Reduction of potential for pollutants to reach the receiving environment through better understanding of risk mitigation.

Table 1: Objectives and Performance Outcomes.

STORMWATER SYSTEM SUMMARY

Highland Pine Products 2 consists of two operational entities, Highland Pine Products Site 1 and 2 in Oberon. A summary of the stormwater system is provided below. An overview of the stormwater system is attached as **Appendix 2**.

HIGHLAND PINE PRODUCTS SITE 1.

Stormwater, including roof water is collected from within the site by a series of sumps and pipes into four main drains from the west toward the eastern boundary (**Appendix 3**). The main drains discharge into three pipes located underneath Lowes Mount Road into a railway drain (Piped) heading north until intersecting the Borg MDF drainage system.

Given a high portion of HPP1 is unsealed and heavily trafficked, impacts to stormwater are BOD, TSS and TPH. Controls have been implemented to mitigate these impacts.

Once on Borg land, stormwater then flows via vegetative channel under an easement to the northeast corner of the property prior to discharge at the Northern V Notch (licensed discharge point) into a tributary of Kings Stockyard Creek.

HIGHLAND PINE PRODUCTS SITE 2.

Stormwater, including roof water on the eastern and southern areas of the site are collected in a series of surface drains and underground pipes prior to discharging into the main stormwater discharge channels reach 1 and channel reach 2. (**Appendix 4**). Process water is captured within a separate system for treatment. For sampling purposes, the discharge point for the site is at the end of channel reach 2.

Stormwater from the logyard drains to the interceptor basin located on the eastern edge main storage area prior to discharge to a settlement dam located at the northern end of the Highland Pine Products Site 1. The process allows for sediment removal prior to discharge to the existing stormwater system. In high flows, stormwater from the logyard interceptor basin will bypass the dam and flow into the main Stormwater drain.

With the site predominantly sealed, impacts from the HPP2 site to stormwater are greatest from the Logyard through wood fibre, BOD, TSS and TPH. Structures within the system have been installed to mitigate these impacts.

Structures within System

A series of First Flush Dams, Gross pollutant traps, trash racks and Penstock gate valves have been installed within the stormwater system to manage pollutants and minimize risk to the receiving environment in the event of a loss of containment. The system has been designed to;

- capture and retain the first 10mm of stormwater falling on process areas – First flush dams;
- remove larger floating objects such as bark, plastic bottles – trash racks;
- remove sediments – gross pollutant traps;
- allow for closure of the system in case of spills e.g. chemicals, oils – Penstock or emergency gate valves.
- Over/under weirs – control of oil spills.

Criteria and Guideline Values – HPP Site 2

Under agreement with the adjacent land owner (Borg), stormwater discharging off HPP2 is not required to meet specific water quality values. HPP2 must work with Borg should water quality deteriorate and results report outside guideline values as detailed in **Table 2** and **Table 3**, below.

Stormwater

Stormwater sampling will be undertaken from the final discharge point at the end of Channel Reach 3 on the Structaflor site by Borg. Should guideline values be exceeded, Borg will notify HPP and collectively review potential pollutant sources for rectification.

Should Borg raise concern regarding discharge water quality, HPP will begin quarterly Due Diligence testing on surface water from the final HPP discharge point (end of Channel Reach 2) to assess impacts of its operations on stormwater considering analytes and criteria below.

Analyte	Units	Criteria/Guideline	Documented
pH	pH	6.5 – 8.5	EP License 11566[1]
Total suspended solids (TSS)	mg/L	30	EP License 11566
Oil and Grease	mg/L	10	EP License 11566
Aldrin	mg/L	0.03	EP License 3035 [2]
Dieldrin	mg/L	0.03	EP License 3035
Methylene blue active substances (MBAS)	mg/L	0.5	EP License 3035
Colour	Hazen	160	EP License 3035
Biological oxygen demand	mg/L	20	EP License 3035

Table 2: Stormwater Analytes and Guideline Values (HPP2).

1. Borg Structaflor – monitoring point – Historical EP License 11566
2. MDF Borg - EP License 3035

SEDIMENT

Sediments collected in the final Gross Pollutant Trap along channel reach 3 will be sampled and classified considering waste classification guidelines prior to off-site disposal. Note the requirement to test sediment is also triggered as a result of a positive surface water test for OCP's (completed by Borg). Compliance with guideline values indicate the waste is classified as general or restricted solid waste. Results above guideline values must be further assessed to determine disposal options prior to removal off site.

Table 5.2. Sediment classification guideline values.

Analyte	Units	Maximum values of specific contaminant concentration (SCC) for classification without TCLP	
		General Solid Waste.	**Restricted Solid Waste.**
Total Petroleum Hydrocarbons (TPH) C6–C9 [(1)]	mg/kg	650	2600
TPH C10 – C36 [(1)]	mg/kg	10,000	40000
Polycyclic Aromatic Hydrocarbons (PAH) [(1)]	mg/kg	200	800
Aldrin and Dieldrin [(1) (2)]	mg/kg	2 – <50	2 – <50

Table 3: Sediment Classification Guideline Values (HPP2).

1. NSW EPA, 2014. Waste Classification Guidelines Part 1 – Classifying a waste.
2. Chemical Control Orders, 2004. Scheduled waste under the *Environmentally Hazardous Chemicals Act, 1985*.

Sediment exceeding the Chemical Control Order (CCO) for scheduled chemicals of 2mg/kg will need to be either contained on site or disposed of to a licensed landfill. Concentrations of up to 50mg/kg can remain on site but are regulated by the Chemical Control Order. Sediments below the scheduled chemicals limit of 2mg/kg may be reused on site or disposed of to the local landfill.

If sediment levels above guideline values as detailed in **Table 3** are detected, HPP and Borg will work together to;

- Identify the source of contaminants, and
- Detail how contaminated waste will be collected and disposed of in accordance with the CCO.

Criteria and Guideline Values – HPP Site 1

Stormwater.

Highland Pine site 1 Environmental Protection Licence (EPL 887) provides limits that must be met for surface water quality prior to discharge. Under agreement with the adjacent landowner (Borg), surface water travels via a vegetative channel on Borg land before its final discharge point at the Northern V Notch.

HPP 1 water quality must be compliant with the EPL limits detailed in **Table 4** at the Northern V Notch.

Analyte	Unit	EPL 100 Percentile Limit
BOD	mg/l	20
Oil and Grease	mg/l	10
pH	pH units	6.5-8.5
Total Suspended Solids	mg/l	30
Total Iron	mg/l	No Limit
Filterable Iron	mg/l	No Limit
MBAS	mg/l	No Limit
Nitrate	mg/l	No Limit
Nitrite	mg/l	No Limit
TKN	mg/l	No Limit
Turbidity	NTU	No Limit

Table 4: HPP1 Analyte and Surface Water criteria.

In 2011, Borg diverted flow from the drainage channel prior to discharge from the Northern V Notch back into the Borg Water Treatment Plant. With no discharge, no monitoring or data has been

collected since 2011. Should flow return to the Northern V notch in future, water will be assessed considering the above criteria on a monthly basis.

MANAGEMENT SAFEGUARDS AND CONTROLS

CONTROLS ON SITE

Physical controls for the protection of stormwater quality exist on both sites and include the following:

- Bunding of bulk chemical and diesel storages.
- Dedicated roadways for truck and forklift traffic.
- Segregation of clean and dirty areas for process waters and stormwater.
- Treatment of first flush water.
- Concrete and shotcrete cover of remaining potentially contaminated areas.
- Bunding and safe storage for small (<50L) chemicals.
- Penstock gate valves to allow for shutting down stormwater system in the event of a spill or fire emergency.
- Gross pollutant traps to manage solids on HPP2 and HPP1
- Trash Screens.

In support of these various operational procedures exist and include the following;

- Emergency response plan
- Emergency response flip charts.
- Pollution incident response management plan.
- Environment Policy.
- Spill SoP.

CLEANING AND MAINTENANCE OF SYSTEM

Cleaning of the production areas and stormwater system is essential to ensuring that the final water quality discharging from the site is within license limits. Maintenance of the stormwater system is essential to ensure that the system runs smoothly and that in the event of an emergency all items of equipment are operational. The cleaning and maintenance items related to the stormwater system are summarized in **Table 5**.

Action	Frequency	Reason
Clean logyard - Surface with loader	As needed, but not less than twice per shift	Remove bark and debris from the logyard and prevent it washing into the stormwater system during rain. Reduce sediment load and colour (Tannins) impact to stormwater.
Remove stockpiled bark and wood debris	Daily	Reduce wood debris and release of tannins from stockpiled material discharging to stormwater.
Clean under log deck HPP2	Twice per shift	Reduce wood debris, and release of tannins from stockpiled material discharging to stormwater.
Clean trash racks Channel reach 1 and Channel reach 2	Following heavy rainfall or monthly	Remove large floating objects and any obstruction to flow through screens/racks
Clean Stormwater drains in main stormwater channel using a bobcat. Channel reach 1, Channel reach 2 and interceptor basin	Following heavy rainfall or monthly	Remove bark and debris and reduce colour discharge to stormwater. Prevent build-up of sediments and maintain free board in Gross pollutant trap for storm events
Engage vac truck to remove sediment from CR1 and CR 2 sumps, logyard first flush and interceptor pits.	As needed but as a minimum quarterly.	Remove gross solids built up in system. Improve water quality of discharge water and reduce likelihood of spills bypassing controls.
Clean First flush dam using excavator	As required	Remove sediments and debris to reduce colour and sediment to stormwater
Check working of Penstock gate valves, undertake maintenance as necessary	Monthly	Gate valves need to be operational in event of an emergency spill on site.
Clean and maintain Site 1 first flush system including pump-out	quarterly	Pump out system. Remove sediments accumulated in sump.
Complete quarterly Due Diligence testing on surface water from the final HPP discharge point (end of Channel Reach 2).	quarterly	Assess impacts of operations on stormwater quality.
Clean and maintain site 1 discharge pits (x3).	6 monthly	Assess solids – complete check-sheet and maintain as required.

Table 5: Stormwater system maintenance requirements.

The items listed above are included in daily work tasks for operational personnel.

Training and Responsibilities

All personnel and contractors are required to complete a full site induction (including assessment) prior to undertaking any work across HPP (both sites). The induction has specific environmental requirements including what to do in the event of a spill. Pollution incident response training is carried out annually for all site-based personnel. All routine tasks are managed by Standard Operating Procedures (SoP's) and non-routine tasks are managed through the RADAR process.

The following summary is provided of the personnel who will be responsible for actions, monitoring and reporting at HPP. As HPP operates on a 24 hour, 7 day a week roster, in some cases both the week day and other shift personnel have been nominated to cover all eventualities. A detailed responsibility matrix is attached as **Table 6** with specific responsibilities assigned to all site personnel.

Function	General Manager	Site Services Manager	Enviro Consultant	Prod/Shift leader	Eng/Maint Manager	Operators	Maintenance personnel	Contractors
Legal and other requirements	X	X	X					
Compliance with legal requirements	X	X	X	X	X	X	X	X
Comply with SWMP objectives and performance outcomes		X		X	X			
Operational control		X		X				
Protection of integrity of concrete and shotcrete areas		X		X	X	X	X	X
Adherence to procedures for excavation					X		X	X
Removal of rubbish from trash racks, sediments from Gross Pollutant Traps		X					X	X
Maintain emergency response – Penstock gate valves					X		X	
Monitoring and measurement		X	X	X		X		
Surface water monitoring		X	X	X				
Sediment monitoring		X	X	X				
Training and awareness		X	X	X				
Develop program and conduct training of employees		X	X	X				
Communication (Internal and External)	X	X	X					
Authority liaison (NSW EPA, etc.)	X	X	X					
Report incidents	X	X	X	X	X	X	X	X
Reporting and Review		X	X	X				
Report results		X	X					
Review SWMP annually		X	X	X	X			
Documentation and Document Control	X	X	X					
Control and update procedures (including excavation)		X		X				

Table 6: Responsibility Matrix.

Production manager or Shift supervisor/Leader is responsible for;

- allocating suitably trained and competent personnel to isolate the stormwater system at the Penstock gate valve/s in the event of a spill or fire event; and
- Activating the Pollution Incident Response Plan (PIRMP) in the event of a loss of containment.
- visual inspection of any affected stormwater;
- collecting a sample for analysis if directed by the Site Services Manager (or delegate).

Site Services Manager is responsible for;

- ensuring that all monitoring of surface water is undertaken in accordance with the EP license and this plan;
- coordinating and overseeing major spill clean–up and or fire water containment activities and ensure that monitoring of surface waters is undertaken; and
- activation of the PIRMP if required.

Reporting and Review

Reporting.

An Annual Return in the approved format in accordance with Condition R1 of the EPL must be completed and supplied to the NSW EPA. The Annual return comprises the monitoring, including surface water monitoring required under the license, complaints summary along with all non-compliances that have occurred through-out the reporting period.

The Annual Return must include a Statement of Compliance signed by a HPP Director or delegated authority and submitted to the NSW EPA within 60 days of the end of the reporting period.

Review

To ensure ongoing conformance with the Stormwater Management Plan and the performance of the system, an annual review of the plan will be undertaken. This process will involve the following;

- Critically examine key objectives and performance outcomes, and the monitoring data collected during the year;

- Identify issues and processes that do not satisfy the minimum performance standards established within this plan;
- Establish and document action plans in response to any unsatisfactory findings in the review process; and
- Maintain records sufficient to demonstrate that the management review process has been implemented.

APPENDIX 1 – ENVIRONMENTAL PROTECTION LICENCE – 11229 AND 887

Environment Protection Licence

Licence - 11229

Licence Details	
Number:	11229
Anniversary Date:	13-August

Licensee

HIGHLAND PINE PRODUCTS PTY LIMITED

LOCKED BAG 8

OBERON NSW 2787

Premises

HIGHLAND PINE PRODUCTS

GATE 3, ALBION STREET

OBERON NSW 2787

Scheduled Activity

Wood or timber milling or processing

Wood preservation

Fee Based Activity	Scale
Wood or timber milling or processing	> 200000 m3 annual processing capacity
Wood preservation	> 30000 m3 annual processing capacity

Region

Central West

L102, 346 PANORAMA AVENUE
BATHURST NSW 2795

Phone: (02) 6333 3800

Fax: (02) 6333 3809

PO Box 1388

BATHURST NSW 2795

Environment Protection Licence

Licence - 11229

Environment Protection Licence

Licence - 11229

Environment Protection Licence

Licence - 11229

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Environment Protection Licence

Licence - 11229

The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

HIGHLAND PINE PRODUCTS PTY LIMITED
LOCKED BAG 8
OBERON NSW 2787

subject to the conditions which follow.

Environment Protection Licence

Licence - 11229

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Wood or timber milling or processing	Wood or timber milling or processing	> 200000 m3 annual processing capacity
Wood preservation	Wood preservation	> 30000 m3 annual processing capacity

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
HIGHLAND PINE PRODUCTS
GATE 3, ALBION STREET
OBERON
NSW 2787
LOT 86 DP 574012, LOT 10 DP 1017456, LOT 1 DP 1047220

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

A3.2 Notwithstanding condition A3.1, works and activities carried out by the licensee for the Bifenthrin treatment plant must be carried out in accordance with;
a) Licence variation form dated 17 March 2010 and supporting documentation.
b) The requirements of Australian/New Zealand Standard, timber preservation plant safety code, Part 1:

Plant design – AS/NZS 2843.1:2000.
c) The requirements of Australian/New Zealand Standard, timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000.

2 Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

P1.1 The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Air

EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
1	Discharge to Air; Air emissions monitoring	Discharge to Air; Air emissions monitoring	Point 7, sawmill heat plant stack from sawmill site air emission plan 21/6/00.
2	Dust monitoring		Dust gauge located at the premise boundary, labelled as "6" in the map titled "Dust, surface water and groundwater monitoring network" within the 2002 AEMR, submitted to the DEC on 27 November 2003.
3	Dust monitoring		Dust gauge located at the premise boundary, labelled as "7" in the map titled "Dust, surface water and groundwater monitoring network" within the 2002 AEMR, submitted to the DEC on 27 November 2003.
4	Dust monitoring		Dust gauge located at the premise boundary, labelled as "8" in the map titled "Dust, surface water and groundwater monitoring network" within the 2002 AEMR, submitted to the DEC on 27 November 2003.
7	Air Emission - Wood preservation	Air Emission - Wood preservation	Air emission point from bifenthrin treatment plant labelled as point No.23 on drawing titled HPP39702 termite repellant project emission point layout dated 5/3/2010 submitted to EPA on 17/3/2010.
8	Air emission - Wood preservation	Air emission - Wood preservation	Air emission point from bifenthrin treatment plant labelled as point No.24 on drawing titled HPP39702 termite repellant project emission point layout dated 5/3/2010 submitted to EPA on 17/3/2010.
9	Weather monitoring		All weather station located within fenced compound within paddock approximately 100 m due south of premises car park.

P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

Environment Protection Licence

Licence - 11229

Water and land

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
5	Groundwater quality monitoring		Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 1" marked on fax from HPP dated 22 January 2004.
6	Groundwater quality monitoring		Groundwater montoring well located on the South-west corner of the premises referred to as "GW monitoring well 3" marked on fax from HPP dated 22 January 2004.

3 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L1.2 In accordance with the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035, the licensee may discharge all stormwater and wastewater generated from the premises untreated to the adjoining licensed premises 3035 for treatment.

L1.3 The licensee must advise the EPA of any changes to the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035, at the time the agreement is changed including termination of the agreement.

L2 Concentration limits

L2.1 For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.

L2.2 Air Concentration Limits

POINT 1

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period

Total Solid Particles	milligrams per cubic metre	250
Nitrogen Oxides	milligrams per cubic metre	2500

L3 Waste

L3.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	General or Specific exempted waste	Waste that meets all the requirements of a resource recovery order and exemption under the Protection of the Environment Operations (Waste) Regulation, as in-force from time to time	As specified in each particular resource recovery exemption	NA

L4 Noise limits

L4.1 Noise from the premises must not exceed:
a) 55 dB(A) $L_{Aeq(15\ minute)}$ during the day (7am to 6pm); and
b) 50 dB(A) $L_{Aeq(15\ minute)}$ during the evening (6pm to 10pm); and
c) at all other times 50 dB(A) $L_{Aeq\ (15\ minute)}$, except as expressly provided by this licence.

Where L_{Aeq} means the equivalent continuous noise level – the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.

L4.2 To determine compliance with condition L4.1 noise must be measured at, or computed for, at "Oorong" or an other noise sensitive location (such as a residence/school) along Herbourne or West Cunynghame Street, Oberon. A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the "Environmental Noise Management - NSW Industrial Noise Policy (January 2000)".

L4.3 The noise emission limits identified in this licence apply under all meteorological conditions except:
a) during rain and wind speeds (at 10m height) greater than 3m/s; and
b) under "non-significant weather conditions".

Note Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.

L4.4 The noise limits in the above table do not apply where the licensee and an affected resident have reached a negotiated agreement in regard to noise.

4 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.

O3.2 Trucks entering and leaving the premises that are carrying loads of material likely to blow off must be covered at all times, except during loading and unloading.

O4 Emergency response

O4.1 Within 3 months of the date of the issue of this licence, the licensee must develop, or update, an emergency response plan which documents the procedures to deal with all types of incidents (e.g. spill, explosions or fire) that may occur at the premises or outside of the premises (e.g. during transfer) which are likely to cause harm to the environment.

O5 Processes and management

O5.1 The bifenthrin treatment facility must be operated in accordance with the requirements of Australian/New Zealand Standard, Timber preservation plant safety code, Part 1: Plant design – AS/NZS 2843.1:2000,

and Australian/New Zealand Standard, Timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000, except as expressly provided by a condition of this licence.

5 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Requirement to monitor concentration of pollutants discharged

M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

M2.2 Air Monitoring Requirements

POINT 1

Pollutant	Units of measure	Frequency	Sampling Method
Carbon dioxide	percent	Yearly	TM-24
Carbon monoxide	milligrams per cubic metre	Yearly	Other Approved Method 1
Dry gas density	kilograms per cubic metre	Yearly	TM-23
Moisture	percent	Yearly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Opacity	percent Opacity	Continuous	CEM-1
Temperature	degrees Celsius	Yearly	TM-2
Total Solid Particles	milligrams per cubic metre	Yearly	TM-15

Velocity	metres per second	Yearly	TM-2
Volumetric flowrate	cubic metres per second	Yearly	TM-2

POINT 2

Pollutant	Units of measure	Frequency	Sampling Method
Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19

POINT 3

Pollutant	Units of measure	Frequency	Sampling Method
Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19

POINT 4

Pollutant	Units of measure	Frequency	Sampling Method
Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19

M2.3 Water and/ or Land Monitoring Requirements

POINT 5

Pollutant	Units of measure	Frequency	Sampling Method
Biochemical oxygen demand	milligrams per litre	Every 6 months	Grab sample
Conductivity	microsiemens per centimetre	Every 6 months	Grab sample
Depth	metres	Every 6 months	In situ
Nitrate	milligrams per litre	Every 6 months	Grab sample
pH	pH	Every 6 months	Grab sample
Total dissolved solids	milligrams per litre	Every 6 months	Grab sample
Total organic carbon	milligrams per litre	Every 6 months	Grab sample

POINT 6

Pollutant	Units of measure	Frequency	Sampling Method
Biochemical oxygen demand	milligrams per litre	Every 6 months	Grab sample

Conductivity	microsiemens per centimetre	Every 6 months	Grab sample
Depth	metres	Every 6 months	In situ
Nitrate	milligrams per litre	Every 6 months	Grab sample
pH	pH	Every 6 months	Grab sample
Total dissolved solids	milligrams per litre	Every 6 months	Grab sample
Total organic carbon	milligrams per litre	Every 6 months	Grab sample

Note: Special Method 1 means assessing and recording the opacity of emissions using Ringelmann Chart.

M3 Testing methods - concentration limits

M3.1 Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:
a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or
b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or
c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.

Note: The *Protection of the Environment Operations (Clean Air) Regulation 2010* requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".

M3.2 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

M4 Weather monitoring

M4.1 For each monitoring point specified in the table below the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.

Point 9

Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method
Air temperature	°C	Continuous	1 hour	AM-4

Wind direction	°	Continuous	15 minute	AM-2 & AM-4
Wind speed	m/s	Continuous	15 minute	AM-2 & AM-4
Sigma theta	°	Continuous	15 minute	AM-2 & AM-4
Rainfall	mm	Continuous	24 hour	AM-4

M5 Recording of pollution complaints

M5.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M5.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M5.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M5.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M6 Telephone complaints line

M6.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M6.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M6.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

M7 Other monitoring and recording conditions

M7.1 Noise monitoring to determine compliance with condition L4 must be carried out at least once annually during the day, evening, and night time hours specified by condition L4.1 at the locations specified under condition L4.2. The 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 Industrial Noise Policy.

6 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:

a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

Environment Protection Licence

7 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

8 Pollution Studies and Reduction Programs

U1 Long Term Noise Reduction - Implement mid term options

U1.1 The licensee must by 30 December 2020 report on actions identified under the short to mid-term options (1-6 years) of Table 1. The report must include, but not necessarily limited to:

- details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long term options for attenuation by location (Table 1 30Jun13), or any subsequent revision from short term reporting.
- details of noise reduction(s) achieved from various sources (locations) within the premises.
- details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations.
- any changes to options for attenuation under Table 1 in the mid term, as well as,
- any changes proposed to options of attenuation under Table 1 in the long term.

U2 Long Term Noise Reduction - Implement long term options

U2.1 The licensee must by 30 November 2023 report on completion of the long term noise attenuation actions (1-9 years) of Table 1. The report must include, but not necessarily limited to:

- details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long term options for attenuation by location (Table 1. 30Jun13), or any subsequent revision from mid-term reporting.
- details of noise reduction(s) achieved from various sources (locations) within the premises.
- details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations.
- any changes proposed to options of attenuation to ensure noise emissions from premises can comply with 45 dB(A) LAeq (15 minute) noise limit by 30 December 2023.

By 30 December 2023, the licence must achieve a 5 dB(A) noise reduction from the premises as after 1 January 2024 the EPA will be amending the night time noise limit of licence 11229 by 5 dB(A) to 45 dB(A) LAeq (15 minute).

Background to Long Term Noise Reduction Program

Note: Consistent with developing a long term continuous noise improvement program for the Highland Pine Products (HPP) sawmill, the licensee completed and submitted to the EPA the following reports;
1) a Survey of Occupational Noise Exposures in Green and Planer Mills (report) by Knox OHS Solutions March 2013 and
2) Table 1: HPP Noise assessment. Short term and long term options for attenuation by location (Table 1 30Jun13).

By the above conditions U1 to U3, the EPA requires the licensee to implement a long term noise improvement program for the HPP sawmill to achieve a 5 dB(A) reduction in noise from the premises within 10 years to be able to meet a night time noise limit of 45 dB(A) LA eq (15 minute).

As the improvement program is for 10 years and HPP Noise Assessment (Table 1) represents "potential" attenuation options at the time of preparation, the licensee is not bound to follow the short-mid-long term works identified for each location under Table 1. The licensee should however use Table 1 as a guide to the implementation and reporting of improvement works (what's been achieved at each interval and what's proposed for the next interval), towards achieving an overall 5 dB(A) noise reduction at the end of the 10 year program.

The short-mid-long term approach to noise attenuation in Table 1 is the basis for the 3 Long term Noise Reduction PRP's (conditions U1 to U3). The licensee may however revise Table 1 at any time provided the revised Table 1 with a date of revision and revision number is provided to the EPA.

9 Special Conditions

E1 Ongoing Noise Reduction

E1.1 The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction. To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement. The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M7.1, in a report to be provided to the EPA within three months of the conclusion of each reporting period for the premises.

Environment Protection Licence

Licence - 11229

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

Environment Protection Licence

Licence - 11229

flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

Environment Protection Licence

Licence - 11229

TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non - putrescible), special waste or hazardous waste

Mr Darryl Clift

Environment Protection Authority

(By Delegation)

Date of this edition: 13-August-2001

Environment Protection Licence

Licence - 11229

End Notes

1	Licence transferred through application 140715, approved on 28-Aug-2001, which came into effect on 28-Aug-2001.
2	Licence varied by notice 1015795, issued on 19-Apr-2002, which came into effect on 14-May-2002.
3	Licence varied by notice 1031224, issued on 20-Sep-2004, which came into effect on 15-Oct-2004.
4	Licence varied by notice 1050871, issued on 08-Sep-2005, which came into effect on 03-Oct-2005.
5	Licence varied by notice 1068743, issued on 15-Jan-2007, which came into effect on 15-Jan-2007.
6	Licence varied by notice 1074663, issued on 29-Apr-2008, which came into effect on 29-Apr-2008.
7	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
8	Licence varied by notice 1112186, issued on 15-Apr-2010, which came into effect on 15-Apr-2010.
9	Licence varied by notice 1504742 issued on 26-Mar-2012
10	Licence varied by notice 1510007 issued on 08-Jan-2013
11	Licence varied by notice 1521066 issued on 01-Sep-2014
12	Licence varied by notice 1542425 issued on 19-Jul-2016
13	Licence varied by notice 1554004 issued on 03-Aug-2017
14	Licence varied by notice 1567059 issued on 13-Jul-2018
15	Licence varied by notice 1567184 issued on 20-Jul-2018
16	Licence varied by notice 1572581 issued on 19-Nov-2018
17	Licence varied by notice 1578420 issued on 11-Apr-2019

Environment Protection Licence

Licence - 887

Licence Details	
Number:	887
Anniversary Date:	12-August

Licensee

HIGHLAND PINE PRODUCTS PTY LIMITED

LOCKED BAG 8

OBERON NSW 2787

Premises

HIGHLAND PINE SAW MILL

LOWES MOUNT ROAD

OBERON NSW 2787

Scheduled Activity

Wood or timber milling or processing

Fee Based Activity	Scale
Wood or timber milling or processing	0-50000 m3 annual processing capacity

Region

Central West

Lvl 2, 203-209 Russell Street
BATHURST NSW 2795

Phone: (02) 6332 7600

Fax: (02) 6332 7630

PO Box 1388 BATHURST

NSW 2795

Environment Protection Licence

Licence - 887

Environment Protection Licence

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Environment Protection Licence

Licence - 887

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Environment Protection Licence

Licence - 887

The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

HIGHLAND PINE PRODUCTS PTY LIMITED
LOCKED BAG 8
OBERON NSW 2787

subject to the conditions which follow.

Environment Protection Licence

Licence - 887

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Wood or timber milling or processing	Wood or timber milling or processing	0 - 50000 m3 annual processing capacity

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
HIGHLAND PINE SAW MILL
LOWES MOUNT ROAD
OBERON
NSW 2787
LOT 1 DP 128404, LOT 1 DP 155561, LOT B DP 160792, LOT 8 DP 204131, LOT 1 DP 360361, LOT 1 DP 360362, LOT E DP 411788, LOT 88 DP 592323
EASEMENT ACROSS LOT 26 DP 1200697 AS PER AGREEMENT BETWEEN OBERON SOFTWOOD HOLDINGS PTY LTD (LANDHOLDER OF PREMISES) AND BORG PANELS PTY LIMITED.

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

Environment Protection Licence

Licence - 887

2 Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

P1.1 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.

P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

Water and land

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
1	Discharge to waters Discharge quality monitoring	Discharge to waters Discharge quality monitoring	Stormwater drain discharging from the boundary of premises (end of easement), labelled as 01 on the site layout map attached to the licence variation application dated 26 May 2008.

3 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Concentration limits

L2.1 For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.

L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.

L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.

L2.4 Water and/or Land Concentration Limits

Environment Protection Licence

Licence - 887

POINT 1

Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit
Biochemical oxygen demand	milligrams per litre				20
Oil and Grease	milligrams per litre				10
pH	pH				6.5-8.5
Total suspended solids	milligrams per litre				30

L3 Waste

L3.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA

4 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and

b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

5 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Requirement to monitor concentration of pollutants discharged

M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

M2.2 Water and/ or Land Monitoring Requirements

POINT 1

Pollutant	Units of measure	Frequency	Sampling Method
Biochemical oxygen demand	milligrams per litre	Monthly during discharge	Representative sample
Filterable iron	milligrams per litre	Monthly during discharge	Representative sample

Methylene Blue Active Substances	milligrams per litre	Monthly during discharge	Representative sample
Nitrate + nitrite (oxidised nitrogen)	milligrams per litre	Monthly during discharge	Representative sample
Oil and Grease	milligrams per litre	Monthly during discharge	Representative sample
pH	pH	Monthly during discharge	Representative sample
Total Iron	milligrams per litre	Monthly during discharge	Representative sample
Total suspended solids	milligrams per litre	Monthly during discharge	Representative sample
Turbidity	nephelometric turbidity units	Monthly during discharge	Representative sample

M3 Testing methods - concentration limits

M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

M4 Recording of pollution complaints

M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M4.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M5 Telephone complaints line

M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or

by the vehicle or mobile plant, unless otherwise specified in the licence.

M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M5.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

6 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:
1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

Environment Protection Licence

Licence - 887

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

7 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

Environment Protection Licence

Licence - 887

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

Environment Protection Licence

Licence - 887

flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

Environment Protection Licence

Licence - 887

TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste

Ms Nadia Kanhoush

Environment Protection Authority

(By Delegation)

Date of this edition: 08-August-2000

Environment Protection Licence

Licence - 887

End Notes

1	Licence varied by notice 1002230, issued on 23-Oct-2000, which came into effect on 17-Nov-2000.
2	Licence transferred through application 140157, approved on 12-Feb-2001, which came into effect on 20-Dec-2000.
3	Licence varied by notice 1004263, issued on 15-Feb-2001, which came into effect on 12-Mar-2001.
4	Licence varied by notice 1009314, issued on 19-Jul-2001, which came into effect on 13-Aug-2001.
5	Licence varied by notice 1025776, issued on 12-Jun-2003, which came into effect on 12-Jun-2003.
6	Licence varied by notice 1039424, issued on 30-Jul-2004, which came into effect on 30-Jul-2004.
7	Licence varied by notice 1050874, issued on 08-Sep-2005, which came into effect on 03-Oct-2005.
8	Licence fee period changed by notice 1060545 on 16-May-2006.
9	Licence varied by notice 1088507, issued on 18-Aug-2008, which came into effect on 18-Aug-2008.
10	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
11	Licence varied by notice 1095823, issued on 06-Feb-2009, which came into effect on 06-Feb-2009.
12	Licence varied by notice 1504737 issued on 09-Mar-2012
13	Licence varied by notice 1551038 issued on 11-Jul-2017

Environment Protection Licence

Licence - 105

Licence Details	
Number:	105
Anniversary Date:	12-August

Licensee

HIGHLAND PINE PRODUCTS PTY LIMITED

LOCKED BAG 8

OBERON NSW 2787

Premises

HIGHLAND PINE PRODUCTS

369 STEWART STREET

BATHURST NSW 2795

Scheduled Activity

Wood preservation

Fee Based Activity	Scale
Wood preservation	0-10000 m3 annual processing capacity

Region

Central West

L102, 346 PANORAMA AVENUE
BATHURST NSW 2795

Phone: (02) 6333 3800

Fax: (02) 6332 7630

PO Box 1388

BATHURST NSW 2795

Environment Protection Licence

Licence - 105

Environment Protection Licence

Licence - 105

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Environment Protection Licence

Licence - 105

The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

HIGHLAND PINE PRODUCTS PTY LIMITED
LOCKED BAG 8
OBERON NSW 2787

subject to the conditions which follow.

Environment Protection Licence

Licence - 105

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Wood preservation	Wood preservation	0 - 10000 m3 annual processing capacity

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
HIGHLAND PINE PRODUCTS
369 STEWART STREET
BATHURST
NSW 2795
LOT 3 DP 270264

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

2 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Waste

L2.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	As specified in each particular resource recovery exemption	NA
NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA

3 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and

b) must be operated in a proper and efficient manner.

O3 Emergency response

O3.1 The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.

O4 Processes and management

O4.1 The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.

O4.2 The licensee must ensure that waste identified for recycling is stored separately from other waste.

4 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Recording of pollution complaints

M2.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M2.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M2.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M2.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M3 Telephone complaints line

M3.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M3.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M3.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

5 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the

carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

6 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

7 Special Conditions

E1 Recommencement of operations

E1.1 The licensee must notify the EPA in writing of it's intention to recommence operations at the premises prior to these operations being undertaken at the premises. The licensee must include an application to vary the licence to increase the activity scale to '>30,000 m3 annual processing capacity' with this notification.

Environment Protection Licence

Licence - 105

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
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COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
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Environment Protection Licence

Licence - 105

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hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
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scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

Environment Protection Licence

Licence - 105

TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste

Mr Bernie Weir

Environment Protection Authority

(By Delegation)

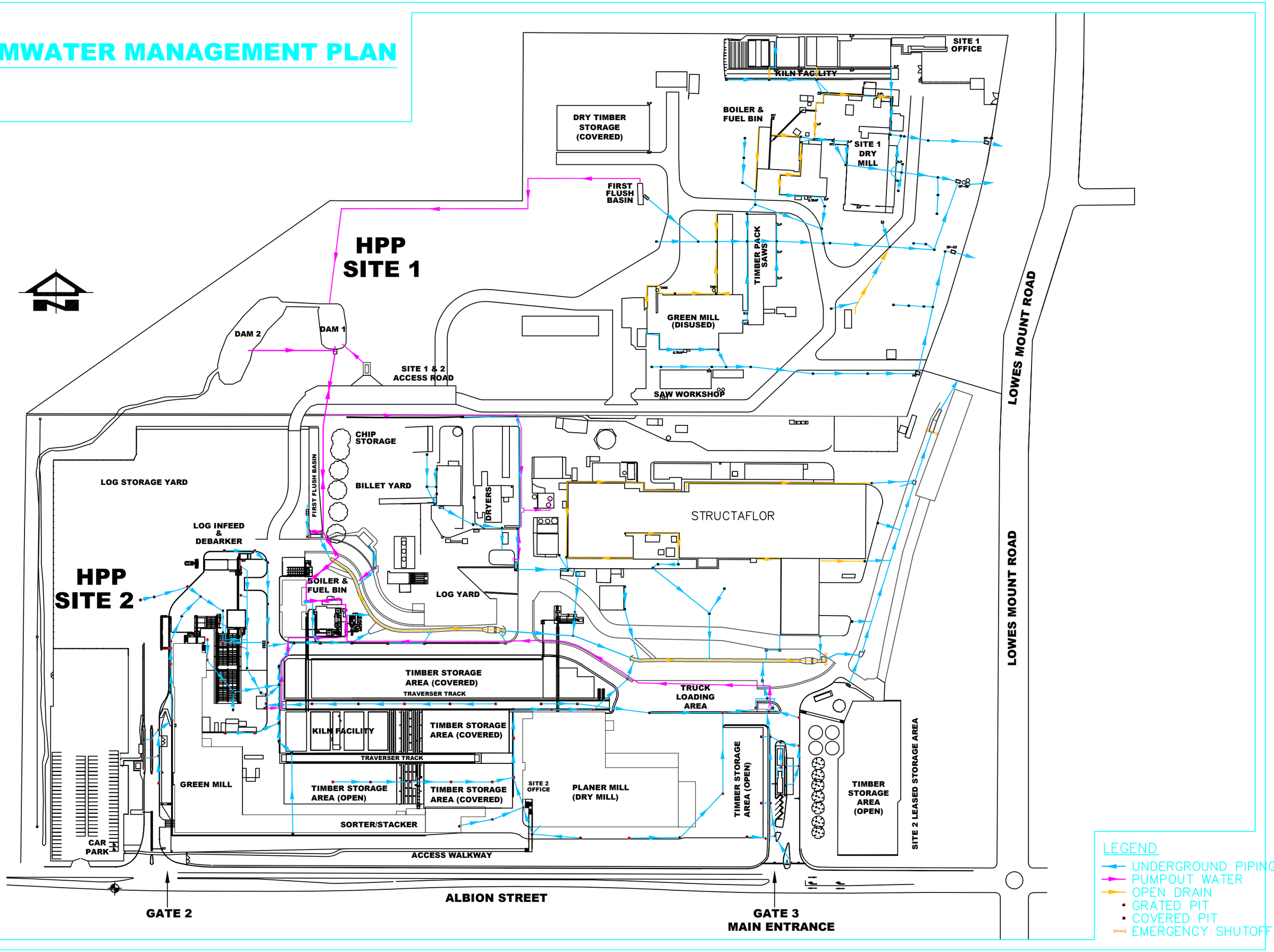
Date of this edition: 25-June-2001

End Notes

1	Licence varied by notice 1030961, issued on 30-Dec-2003, which came into effect on 30-Dec-2003.
2	Licence varied by notice 1047041, issued on 26-May-2005, which came into effect on 20-Jun-2005.
3	Licence varied by notice 1087240, issued on 06-Jun-2008, which came into effect on 06-Jun-2008.
4	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
5	Licence varied by notice 1110416, issued on 05-Oct-2010, which came into effect on 05-Oct-2010.
6	Licence varied by notice 1505810 issued on 11-Nov-2013
7	Licence varied by notice 1544482 issued on 28-Oct-2016
8	Licence varied by notice 1566471 issued on 28-Jun-2018

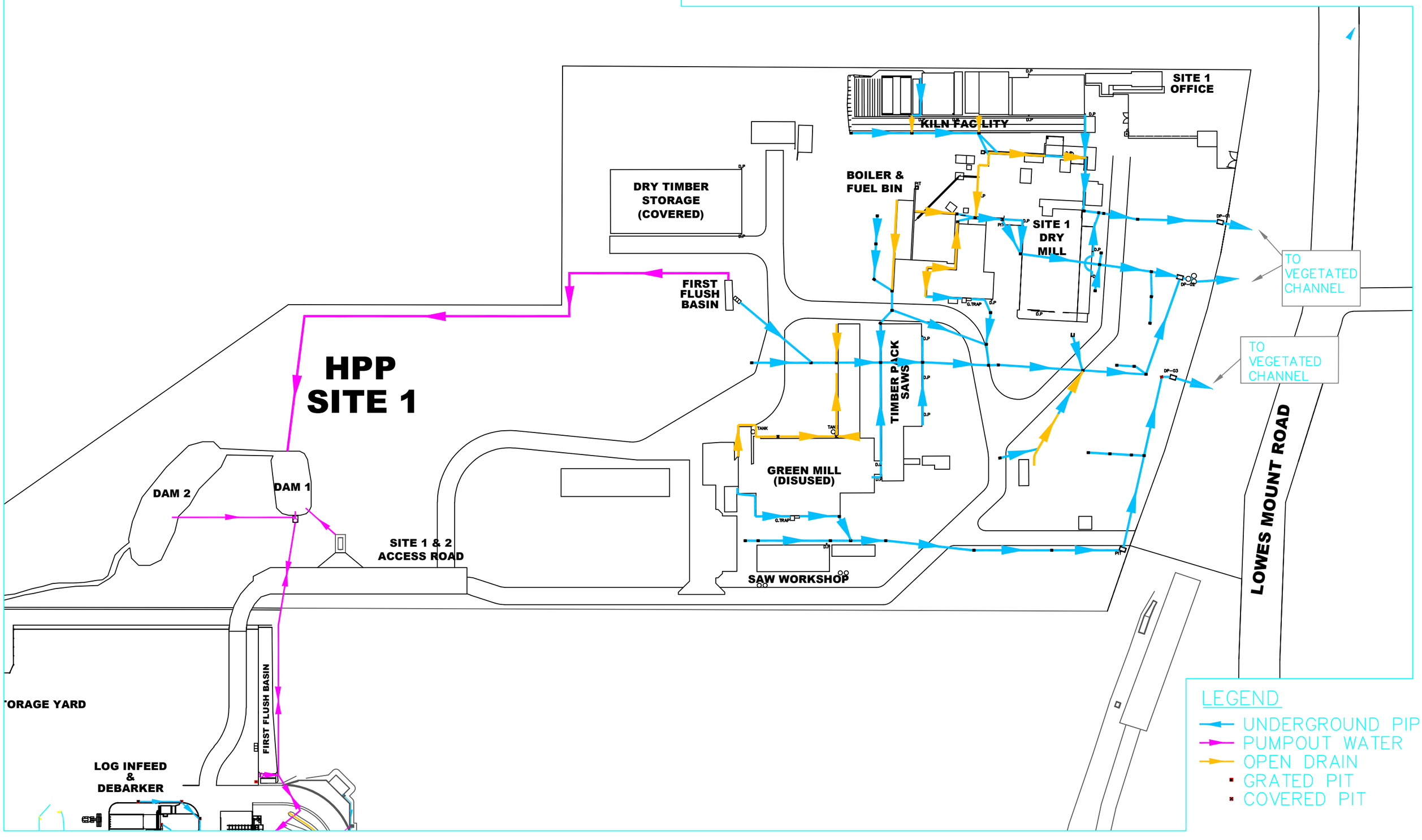
APPENDIX 2 – SURFACE WATER FLOW – SITE OVERVIEW.

STORMWATER MANAGEMENT PLAN



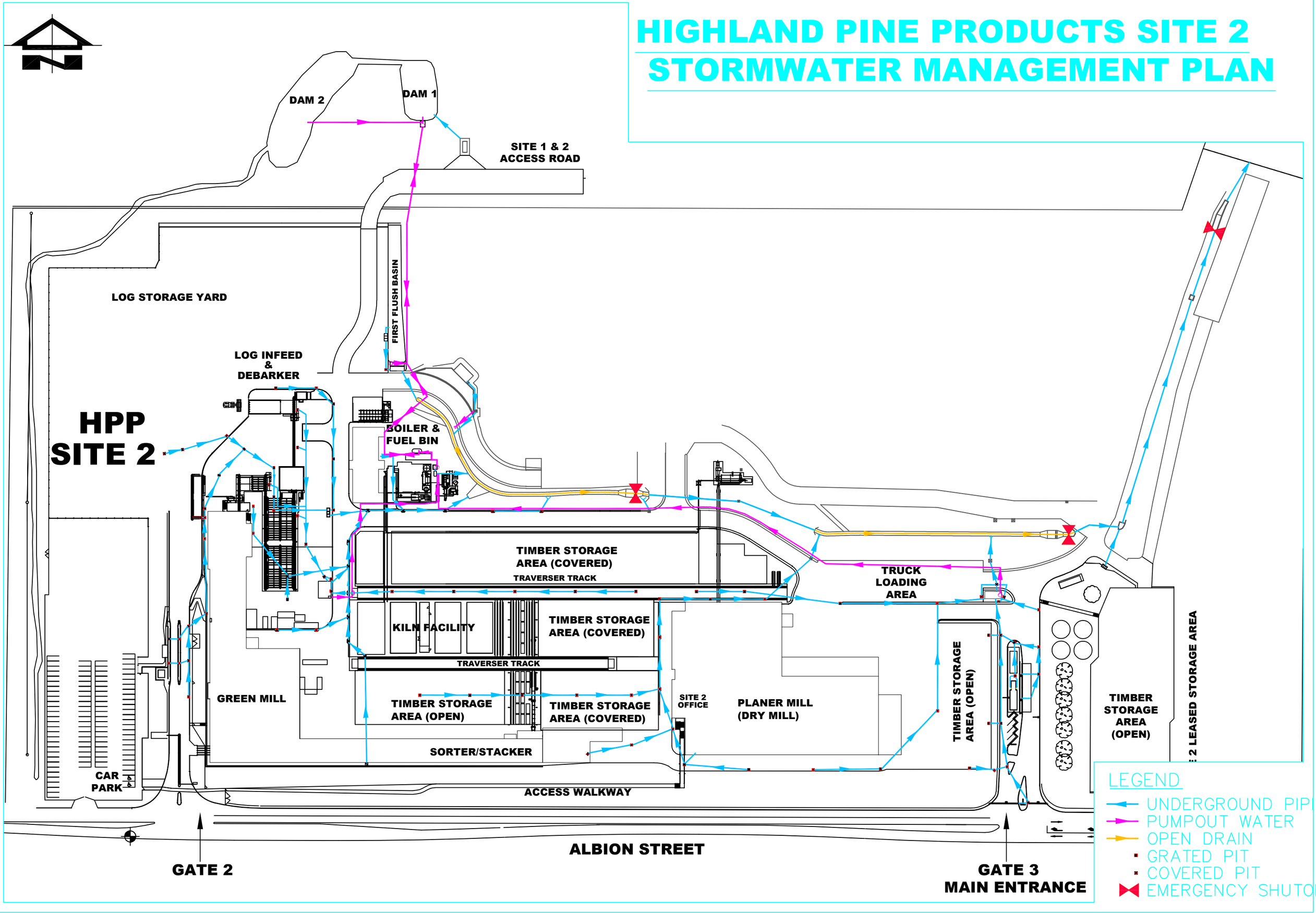
APPENDIX 3 – SURFACE WATER FLOW – HPP SITE 1.

HIGHLAND PINE PRODUCTS SITE 1
STORMWATER MANAGEMENT PLAN



APPENDIX 4 – SURFACE WATER FLOW – HPP SITE 2.

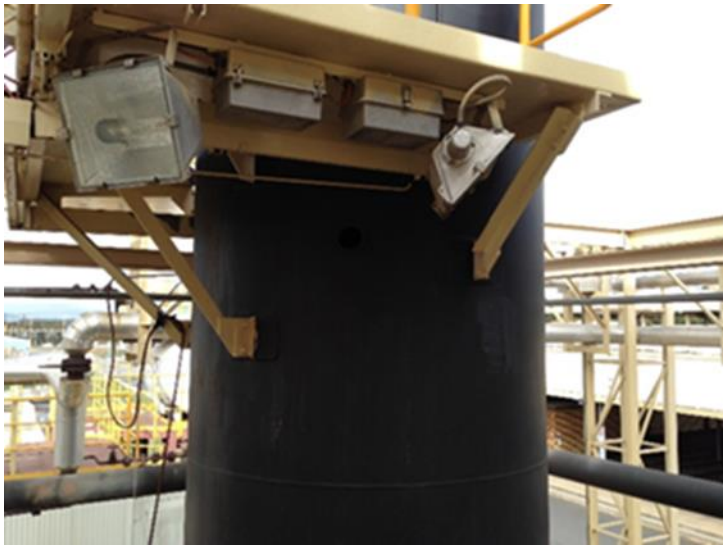
HIGHLAND PINE PRODUCTS SITE 2
STORMWATER MANAGEMENT PLAN



APPENDIX G

EKTIMO REPORT 2021 – HPP HEATPLANT

Ektimo



REPORT NUMBER R010879

Emission Testing Report
Highland Pine Products Pty Ltd, Oberon Plant

Document Information

Template Version; 240920

Client Name:	Highland Pine Products Pty Ltd
Report Number:	R010879
Date of Issue:	16 July 2021
Attention:	Ben Gawehn
Address:	3 Albion St Oberon NSW 2787
Testing Laboratory:	Ektimo Pty Ltd, ABN 86 600 381 413

Report Authorisation

NATA Accredited Laboratory
No. 14601

Aaron Davis
Ektimo Signatory

Accredited for compliance with ISO/IEC 17025 - Testing. NATA is a signatory to the ILAC mutual recognition arrangement for the mutual recognition of the equivalence of testing, calibration and inspection reports.

Please note that only numerical results pertaining to measurements conducted directly by Ektimo are covered by Ektimo's terms of NATA accreditation. This does not include comments, conclusions or recommendations based upon the results. Refer to 'Test Methods' for full details of testing covered by NATA accreditation.

Table of Contents

1 EXECUTIVE SUMMARY

1.1 *Background*

Ektimo was engaged by Highland Pine Products Pty Ltd to perform emission testing on EPA - 1 Boiler Stack at their Oberon plant. Testing was carried out in accordance with Environment Protection Licence, 11229.

1.2 *Project Objectives*

The objectives of the project were to conduct a monitoring programme to quantify emissions from one discharge point to determine compliance with Highland Pine Products Pty Ltd's Environment Protection Licence.

Monitoring was performed as follows:

Location	Test Date	Test Parameters*
EPA 1 – Boiler Stack	13 May 2021	Total solid particles Particle size analysis Nitrogen oxides, carbon monoxide, carbon dioxide, oxygen

* Flow rate, velocity, temperature and moisture were also determined.

All results are reported on a dry basis at STP.

Plant operating conditions have been noted in the report.

1.3 *Licence Comparison*

The following licence comparison table shows that all analytes highlighted in green are within the licence limit set by the NSW EPA as per licence 11229 (last amended on 17 February 2021).

EPA No.	Location Description	Pollutant	Units	Licence Limit	Detected Values	Detected values (corrected to 12% CO_2)
1	Boiler Stack	Total Solid Particles	mg/m^3	250	220	220
		Nitrogen Oxides (as NO_2)	mg/m^3	2500	100	NA

Please note that the measurement uncertainty associated with the test results was not considered when determining whether the results were compliant or non-compliant.

Refer to the Test Methods table for the measurement uncertainties.

1.4 *Results Summary*

EPA No.	Location Description	Pollutant	Units	13/05/2021
1	Boiler Stack	Total Solid Particles (Raw - STP only)	mg/m^3	220
		Total Solid Particles (Corrected to 12% CO_2)	mg/m^3	220
		Nitrogen Oxides (as NO_2)	mg/m^3	100
		Carbon Monoxide	mg/m^3	640
		Carbon Dioxide	%	11.9
		Carbon Dioxide Correction factor (12%)	multiplier	1.01
		Oxygen	%	9.7
		Temperature	°C	281
		Moisture	%	11
		Velocity	m/s	9.5
		Volumetric Flow Rate (discharge conditions)	m^3/s	32
		Volumetric Flow Rate (dry STP)	m^3/s	12

2 RESULTS

2.1 *EPA 1 – Boiler Stack*

Date	13/05/2021	**Client**	Highland Pine Products Pty Ltd
Report	R010879	**Stack ID**	EPA 1 - Boiler Stack
Licence No.	11229	**Location**	Oberon
Ektimo Staff	Steven Cooper & Ish Alam	**State**	NSW
Process Conditions	Boiler at 80% Load producing 25.6 tonnes per hour of steam		*210506*

Sampling Plane Details	
Sampling plane dimensions	2065 mm
Sampling plane area	3.35 m²
Sampling port size, number	4" BSP (x2)
Access & height of ports	Scissor lift 8 m
Duct orientation & shape	Vertical Circular
Downstream disturbance	Change in diameter 1 D
Upstream disturbance	Junction 3 D
No. traverses & points sampled	2 24
Sample plane compliance to AS4323.1	Compliant but non-ideal

Comments
The gas profile has a cyclonic component which exceeds 15°
The highest to lowest differential pressure ratio exceeds 9:1
The sampling plane is too near to the downstream disturbance but is greater than or equal to 1D
The sampling plane is too near to the upstream disturbance but is greater than or equal to 2D

Stack Parameters		
Moisture content, %v/v	11	
Gas molecular weight, g/g mole	29.0 (wet)	30.4 (dry)
Gas density at STP, kg/m³	1.29 (wet)	1.36 (dry)
Gas density at discharge conditions, kg/m³	0.56	
% Carbon dioxide correction & Factor	12 %	1.01
Gas Flow Parameters		
Flow measurement time(s) (hhmm)	1335 & 1550	
Temperature, °C	281	
Temperature, K	554	
Velocity at sampling plane, m/s	9.5	
Volumetric flow rate, actual, m³/s	32	
Volumetric flow rate (wet STP), m³/s	14	
Volumetric flow rate (dry STP), m³/s	12	
Mass flow rate (wet basis), kg/hour	64000	

Gas Analyser Results	Average			Minimum			Maximum		
Sampling time	1349 - 1521			1349 - 1521			1349 - 1521		
	Concentration mg/m³	Corrected to 12% CO2 mg/m³	Mass Rate g/min	Concentration mg/m³	Corrected to 12% CO2 mg/m³	Mass Rate g/min	Concentration mg/m³	Corrected to 12% CO2 mg/m³	Mass Rate g/min
Combustion Gases									
Nitrogen oxides (as NO_2)	100	100	76	64	65	47	160	160	110
Carbon monoxide	640	640	460	320	320	230	1900	1900	1400
		Concentration %v/v			Concentration %v/v			Concentration %v/v	
Carbon dioxide		11.9			7.6			15.5	
Oxygen		9.7			5.4			12.7	

Isokinetic Results		Results		
Sampling time		1342-1545		
		Concentration mg/m³	Corrected to 12% CO2 mg/m³	Mass Rate g/min
Solid particles		220	220	160
Fine particulates (PM10)	(PSA)	95	96	69
Fine particulates (PM2.5)	(PSA)	25	25	18
Isokinetic Sampling Parameters				
Sampling time, min		120		
Isokinetic rate, %		99		
Velocity difference, %		1		

3 PLANT OPERATING CONDITIONS

See Highland Pine Products Pty Ltd records for complete process conditions. The Boiler was operating at 80% load, producing 25.6 tonnes/hour of steam at the time of testing.

4 TEST METHODS

All sampling and analysis performed by Ektimo unless otherwise specified. Specific details of the methods are available upon request.

Parameter	Sampling Method	Analysis Method	Uncertainty*	NATA Accredited	
				Sampling	Analysis
Sample plane criteria	NSW TM-1	NA	NA	✓	NA
Flow rate, temperature and velocity	NA	NSW TM-2	8%, 2%, 7%	NA	✓
Moisture content	NSW TM-22	NSW TM-22	8%	✓	✓
Carbon dioxide	NSW TM-24	NSW TM-24	13%	✓	✓
Carbon monoxide	NSW TM-32	NSW TM-32	12%	✓	✓
Nitrogen oxides	NSW TM-11	NSW TM-11	12%	✓	✓
Oxygen	NSW TM-25	NSW TM-25	13%	✓	✓
Solid particles (total)	NSW TM-15	NSW TM-15††	3%	✓	✓
Particulate matter (PM_{10} and $PM_{2.5}$) by particle size analysis	AS 4323.2	HRL In-house	-	-	✓**

200708

* Uncertainty values cited in this table are calculated at the 95% confidence level (coverage factor = 2)

†† Gravimetric analysis conducted at the Ektimo Unanderra, NSW laboratory, NATA accreditation number 14601.

** Analysis performed by HRL Technology using a Malvern Instruments Mastersizer laser particle size analyser. NATA Accreditation does not cover the performance of this service. Results were reported to Ektimo on 28 May 2021 in report number 210646.

5 QUALITY ASSURANCE/QUALITY CONTROL INFORMATION

Ektimo is accredited by the National Association of Testing Authorities (NATA) for the sampling and analysis of air pollutants from industrial sources. Unless otherwise stated test methods used are accredited with the National Association of Testing Authorities. For full details, search for Ektimo at NATA's website www.nata.com.au.

Ektimo is accredited by NATA (National Association of Testing Authorities) to ISO/IEC 17025 - Testing. ISO/IEC 17025 - Testing requires that a laboratory have adequate equipment to perform the testing, as well as laboratory personnel with the competence to perform the testing. This quality assurance system is administered and maintained by the Quality Director.

NATA is a member of APLAC (Asia Pacific Laboratory Accreditation Co-operation) and of ILAC (International Laboratory Accreditation Co-operation). Through the mutual recognition arrangements with both of these organisations, NATA accreditation is recognised worldwide.

6 DEFINITIONS

The following symbols and abbreviations may be used in this test report:

% v/v	Volume to volume ratio, dry or wet basis
~	Approximately
<	Less than
>	Greater than
≥	Greater than or equal to
APHA	American public health association, Standard Methods for the Examination of Water and Waste Water
AS	Australian Standard
BSP	British standard pipe
CARB	Californian Air Resources Board
CEM	Continuous Emission Monitoring
CEMS	Continuous Emission Monitoring System
CTM	Conditional test method
D	Duct diameter or equivalent duct diameter for rectangular ducts
D_{50}	'Cut size' of a cyclone defined as the particle diameter at which the cyclone achieves a 50% collection efficiency ie. half of the particles are retained by the cyclone and half are not and pass through it to the next stage. The D_{50} method simplifies the capture efficiency distribution by assuming that a given cyclone stage captures all of the particles with a diameter equal to or greater than the D_{50} of that cyclone and less than the D_{50} of the preceding cyclone.
DECC	Department of Environment & Climate Change (NSW)
Disturbance	A flow obstruction or instability in the direction of the flow which may impede accurate flow determination. This includes centrifugal fans, axial fans, partially closed or closed dampers, louvres, bends, connections, junctions, direction changes or changes in pipe diameter.
DWER	Department of Water and Environmental Regulation (WA)
DEHP	Department of Environment and Heritage Protection (QLD)
EPA	Environment Protection Authority
FTIR	Fourier Transform Infra-red
ISC	Intersociety committee, Methods of Air Sampling and Analysis
ISO	International Organisation for Standardisation
Lower Bound	Defines values reported below detection as equal to zero.
Medium Bound	Defines values reported below detection are equal to half the detection limit.
NA	Not applicable
NATA	National Association of Testing Authorities
NIOSH	National Institute of Occupational Safety and Health
NT	Not tested or results not required
OM	Other approved method
OU	The number of odour units per unit of volume. The numerical value of the odour concentration is equal to the number of dilutions to arrive at the odour threshold (50% panel response).
PM_{10}	Atmospheric suspended particulate matter having an equivalent aerodynamic diameter of less than approximately 10 microns (µm).
$PM_{2.5}$	Atmospheric suspended particulate matter having an equivalent aerodynamic diameter of less than approximately 2.5 microns (µm).
PSA	Particle size analysis
RATA	Relative Accuracy Test Audit
Semi-quantified VOCs	Unknown VOCs (those not matching a standard compound), are identified by matching the mass spectrum of the chromatographic peak to the NIST Standard Reference Database (version 14.0), with a match quality exceeding 70%. An estimated concentration will be determined by matching the integrated area of the peak with the nearest suitable compound in the analytical calibration standard mixture.
STP	Standard temperature and pressure. Gas volumes and concentrations are expressed on a dry basis at 0°C, at discharge oxygen concentration and an absolute pressure of 101.325 kPa, unless otherwise specified.
TM	Test Method
TOC	The sum of all compounds of carbon which contain at least one carbon to carbon bond, plus methane and its derivatives.
USEPA	United States Environmental Protection Agency
VDI	Verein Deutscher Ingenieure (Association of German Engineers)
Velocity Difference	The percentage difference between the average of initial flows and afterflows.
Vic EPA	Victorian Environment Protection Authority
VOC	Any chemical compound based on carbon with a vapour pressure of at least 0.010 kPa at 25°C or having a corresponding volatility under the particular conditions of use. These compounds may contain oxygen, nitrogen and other elements, but specifically excluded are carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonate salts.
XRD	X-ray Diffractometry
Upper Bound	Defines values reported below detection are equal to the detection limit.
95% confidence interval	Range of values that contains the true result with 95% certainty. This means there is a 5% risk that the true result is outside this range.

7 APPENDIX 1: HRL TECHNOLOGY PARTICLE SIZE ANALYSIS (PSA) REPORT.

Sample Identification	*HRL Lab Ref*	*Sample Location*	*Date of Test*
N 12226	*210646-01*	*EPA 1 – Boiler Stack*	*3 May 2021*

Results

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Facsimile : 03-9565 9879 International: +61-3-9565 9879
Web Site: www.hrl.com.au

HRL Technology Group Pty Ltd
ABN 89 609 887 327
expertise in action
Unit 4, Level 1, 677 Springvale Road
Mulgrave Victoria 3170
AUSTRALIA

Date: **28 May 2021**

File No. **67200019**

To: Name **Steven Cooper**
Company **Ektimo**
Fax No.

Tel No. **1300 364 005**

From: Name **Goulnara Kadykova**

Tel No. **03 9565 9853**

HRL Job No: 210646 Client Job No: R010879

E-Mail. **gkadykova@hrl.com.au**

Number of pages including this page: 2

Job Description Particle Size Distribution of One Sample of Particulate Matter.

Sample Reference One sample of particulate matter was received for particle size distribution analysis. The sample had been collected in a thimble.

Method of Analysis The sample was analysed in the 0.02 to 2000µm range using Malvern Mastersizer 2000. The measurement was carried out using Propan-2-ol as the dispersant. Prior to the analysis the sample was treated with ultrasound in order to assist dispersion. The results are reported as a volume distribution using a general purpose analysis model.

Results The particle size distribution is enclosed with this report. The sample details and mass median diameter are given the table below.

Client Sample ID	HRL Sample ID	Mass Median Diameter (D_{50}) µm
N 12226	210646 - 01	12

Signed: Goulnara Kadykova

Authorised: Nicholas Miller (Business Unit Leader)

MASTERSIZER 2000

HRL Technology Pty Ltd

Result Analysis Report

Sample Name:
210646 - 01 N 12226 - Average

Measured by:
GK

Analysed:
Wednesday, 26 May 2021 10:05:03 PM

Client
Ektimo

Particle Name:
Default 1

Particle RI:
1.520

Particle Absorption:
1

Dispersant Name:
Propan-2-ol

Dispersant RI:
1.390

Analysis model:
General purpose

Obscuration:
12.90 %

Concentration:
0.0086 %Vol

Span :
5.223

Weighted Residual:
0.942 %

Result units:
Volume

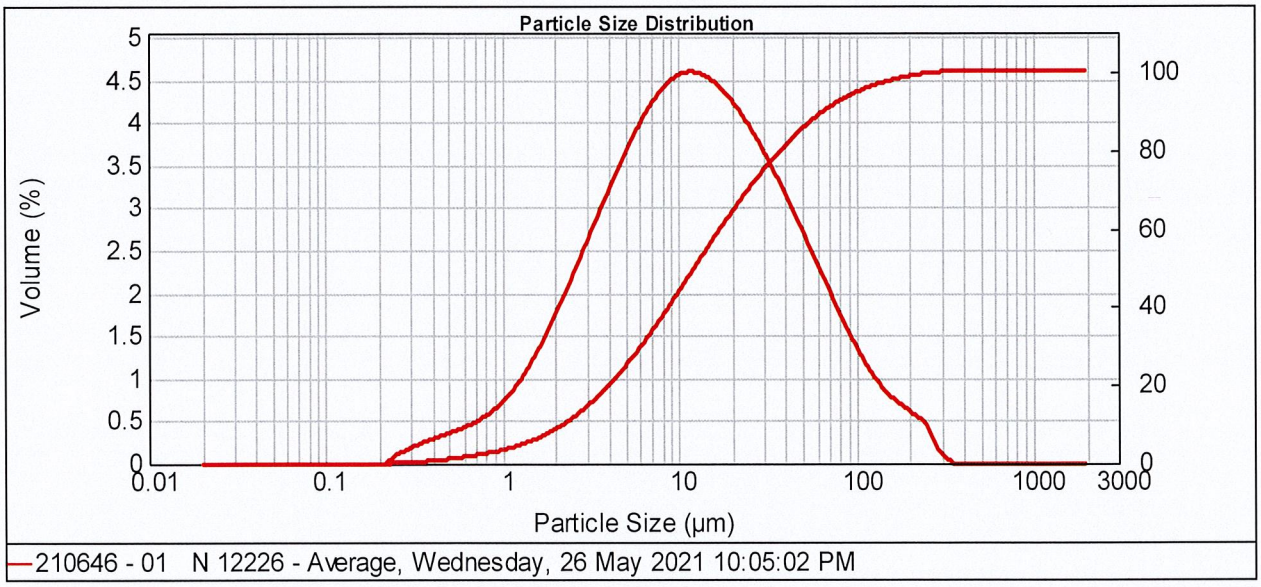
Specific Surface Area:
1.22 m²/cc

Surface Weighted Mean D[3,2]:
4.935 um

Vol. Weighted Mean D[4,3]:
26.345 um

Mode
11.623 um

d(0.1): 2.199 um **d(0.5):** 12.174 um **d(0.9):** 65.787 um



Size (µm)	Vol Under %	Size (µm)	Vol Under %	Size (µm)	Vol Under %	Size (µm)	Vol Under %	Size (µm)	Vol Under %	Size (µm)	Vol Under %
0.020	0.00	0.142	0.00	1.000	3.48	7.096	34.18	50.000	85.63	355.656	100.00
0.022	0.00	0.159	0.00	1.125	4.09	7.962	37.43	56.368	87.66	399.052	100.00
0.025	0.00	0.178	0.00	1.262	4.78	8.934	40.77	63.000	89.38	447.744	100.00
0.028	0.00	0.200	0.00	1.416	5.59	10.000	44.11	70.963	91.03	502.377	100.00
0.032	0.00	0.224	0.00	1.589	6.52	11.247	47.62	79.621	92.46	563.677	100.00
0.036	0.00	0.252	0.06	1.783	7.61	12.619	51.08	89.337	93.71	600.000	100.00
0.040	0.00	0.283	0.16	2.000	8.85	14.159	54.51	100.000	94.78	709.627	100.00
0.045	0.00	0.317	0.31	2.244	10.26	15.887	57.90	112.468	95.74	796.214	100.00
0.050	0.00	0.356	0.48	2.500	11.74	17.825	61.22	126.191	96.55	893.367	100.00
0.056	0.00	0.399	0.69	2.825	13.62	20.000	64.46	141.589	97.25	1000.000	100.00
0.063	0.00	0.448	0.92	3.170	15.57	22.440	67.59	158.866	97.86	1124.683	100.00
0.071	0.00	0.502	1.18	3.557	17.71	25.179	70.62	178.250	98.40	1261.915	100.00
0.080	0.00	0.564	1.47	3.991	20.04	28.251	73.51	200.000	98.89	1415.892	100.00
0.089	0.00	0.632	1.78	4.477	22.54	31.698	76.27	224.404	99.31	1588.656	100.00
0.100	0.00	0.710	2.14	5.024	25.22	35.566	78.88	250.000	99.66	1782.502	100.00
0.112	0.00	0.796	2.53	5.637	28.06	39.905	81.32	282.508	99.90	2000.000	100.00
0.126	0.00	0.893	2.98	6.325	31.05	44.774	83.60	316.979	99.99		

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ABN 86 600 381 413

APPENDIX H

2021 NOISE REPORT - ATKINS

51.7165.R3:GA/DT/2021

ATKINS ACOUSTICS

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Telephone: 02 9879 4544
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Email: AtkinsAcoustics@bigpond.com.au

Highland Pine Products Pty Ltd
Lock Bag 8
OBERON NSW 2787

Attention: Mr Ben Gawehn

17 June 2021

Atkins Acoustics and Associates Pty Ltd.
Consulting Acoustical & Vibration Engineers

HIGHLAND PINE PRODUCTS ENVIRONMENTAL NOISE AUDIT JUNE 2021

1.0 INTRODUCTION

Atkins Acoustics was retained by *Highland Pine Products Pty Ltd* to conduct an environmental noise audit for the Oberon plant.

This report presents results and findings of attended noise measurements conducted on Tuesday 15 June 2021. Inquiries prior to the audits confirmed that HPP was fully operational during the day, evening and night audits.

The reference locations *(Attachment 1)* selected for noise monitoring are summarised in *Table 1.* Other industrial noise sources identified during the attended audit included activities associated with BORG

Table 1. Noise Monitoring Locations

Reference Measurement Location	Description
NM1	26 Cunynghame Street West
NM2	12 Herborn Street
NM3	Oorong (O'Connell Road)

2.0 NOISE CONDITIONS

HPP is the holder of Environmental Protection Licence No 11229 under the *Protection Operations Act 1997.* The licence authorises the carrying out 'Wood or timber milling or processing and 'Wood preservation' at Gate 3, Albion Street, Oberon. Noise conditions referenced on the Licence are summarised in *Table 2* together with noise limits referenced in Development Approval DA 403-11-00.

Table 2. Assessment Noise Limits

Reference	Assessment Location	Sound Pressure Levels $L_{Aeq\ 15min}$ dB $20x10^{-6}$ Pa		
		Day (7.00am - 6.00pm)	Evening (6.00pm - 10.00pm)	Night (10.00pm- 7.00am)
EPL 11229	Oorong or any other noise sensitive location (such as residence/school along Herbourne or West Cunynghame Street	55	50	50
		Sound Pressure Levels $L_{A10\ 15min}$ dB $20x10^{-6}$ Pa		
DA 403-11-00	Residential areas within Oberon	46	41	36
	Residential areas adjacent to industrial areas or main roads	51	46	41
	Residences within industrial areas	56	51	46

NOTES:

1. *To determine compliance with EPL, noise must be measured at or computed for, at 'Oorong' or any other noise sensitive locations (such as a residence/school along Herbon or West Cunyngham Street, Oberon).*
2. *A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the 'Environmental Noise Management - NSW Industrial Noise Policy (January 2000)'.*
3. *The noise limits identified in the licence apply under all meteorological conditions except:*
   a) during rain and wind speeds (at 10m height) greater than 3m/sec: and
   b) under 'non-significant weather conditions'

2.1 Modifying Factors

Notes referenced to the Environmental Protection Licence No 11229 refer to 'modifying factor' adjustments and are applied where the source noise contains characteristics such as tonality, impulsiveness, intermittency, irregularity or dominant low-frequency content.

2.2 Assessment Meteorological Conditions

Reference to reported weather analysis for Oberon (Heggie[February 2006]), the area is subject to Class F temperature inversions during nighttime hours, south-westerly nighttime winds during winter and spring and considered to be a feature of the area as they occur for 30% or more of the time.

3.0 INSTRUMENTATION

The noise measurement instrumentation comprised a Svan 949 Sound and Vibration Analyser. The Svan meter was programmed to record and store 1/3 octave and statistical sound pressure levels. The reference calibration level of the meter was checked prior to and after the measurements with a Bruel & Kjaer Sound Level Calibrator Type 4230 and remained within ± 1dB(A). The instrument satisfies Class 1 performance requirements of AS IEC 61672.1 - 2004: Electro acoustics - Sound Level Meters - Sound Level Meters.

4.0 PREVAILING WEATHER CONDITIONS

Prevailing weather conditions observed during the day and evening audits varied with winds from the west-north-west (<3m/sec) and temperatures between 6-10°C. During the night audit winds were calm to light from the north-west(<3m/sec) at about 2340 hours a temperature inversion developed, temperatures ranged between 0-2°C.

5.0 MEASUREMENT RESULT

Table 3 presents a summary of the measured ambient sound pressure levels, noise approval conditions, estimated noise contributions from HPP and noted observations.

Noise from HPP plant/equipment/activities identified during the audits included general industrial hum, Green Mill cyclone (product impact), onsite road trucks, log feeder (impact loading and transfer) and timber impact (sorter/stacker and green mill building).

In terms of applying the *INP* modifying correction factors no HPP sources during the audits were identified that required tonal, low frequency, impulsive or intermittent adjustments.

Table 3. Attended Statistical Noise Measurements

dBA re: 20 x 10^{-6} Pa

Location	Measured Ambient Sound Pressure Levels 20 x 10^{-6} Pa					Assessment Goals L_{Aeq}	Estimated HPP Contribution L_{Aeq}	Comments
	L_{Aeq}	L_{A90}	L_{A50}	L_{A10}	L_{A1}			
Daytime (1350–1510 hours) 15 June 2021								
Location M1	50.3	45.4	47.4	51.4	60.7	55	<45	HPP not audible; BORG Log impact and steam stack discharge; Intermittent offsite trucks LAmax 50/2dBA and cars LAmax 50/8dBA; Birds.
Location M2	46.8	44.1	46.0	48.8	51.8	55	<45	HPP Sorter/Stacker Building impact LAmax 43/4dBA; HPP Log Feeder LAmax 48/54dBA; BORG Log impact and steam stack discharge; Intermittent traffic Albion Street LAmax 45/8dBA; Birds
Location M3	45.0	38.2	40.8	47.7	55.9	55	<40	HPP general operating noise just audible; HPP Green Mill timber impact LAmax 43/4dBA; HPP Log Feeder LAmax 38/9dBA; Offsite trucks and cars; Insects
Evening (1910–2040 hours) 15 June 2021								
Location M1	47.2	46.0	46.9	48.4	51.0	50	<45	HPP and BORG controlled ambient LAeq 46/7; BORG Steam stack discharge; HPP impact LAmax 46/8dBA; Albion Street trucks LAmax 48/52, Albion Street cars LAmax 46/8dBA.
Location M2	48.4	46.5	47.9	50.1	51.9	50	<45	HPP general steam, fan, production noise audible; HPP Sorter/Stacker Building timber impact LAmax 48/52BA; Albion Street trucks LAmax 52/3dBA; Albion Street traffic LAmax 49/55dBA; Insects
Location M3	45.1	40.3	44.0	48.2	52.0	50	<45	HPP log impact LAmax 48/50, HPP Green Mill timber impact LAmax 44/5dBA; Log Feeder Loader Quaker Reversing Alarm LAmax 48/9dBA.
Night (2255– 0010 hours) 15/16 June 2021								
Location M1	46.0	45.0	45.9	46.9	47.9	50	<46	HPP and BORG controlled ambient LA90 45dBA; BORG Steam stack discharge.
Location M2	46.6	45.3	46.4	47.9	49.9	50	<46	HPP and BORG controlled ambient LAeq 50/1. HPP Impact timber Green Mill Bl'd,.Sorter/Stacker Bl'd. and Log Feeder) LAmax 49/53; Offsite trucks LAmax 54/5.
Location M3*	49.3	45.6	48.0	51.3	56.0	50	<50	HPP general operating noise; HPP log Feeder impact LAmax 60/5, HPP Green Mill timber impact LAmax 54/5dBA; Log Feeder Loader Quaker Reversing Alarm LAmax 49/50dBA

NOTES: Temperature Inversion developed during measurements.

6.0 DISCUSSION

Table 3 presents the results 15 June 2021. Inquiries prior to the audit confirmed that HPP was fully operational during the day, evening and night audits. The reference locations *(Attachment 1)* selected for noise monitoring are summarised in *Table 1.*

HPP plant/equipment/activities identified during the audits included general industrial hum, onsite road trucks, log feeder (impact loading and transfer) and timber impact (Sorter/Stacker and Green Mill Buildings) and reversing alarm Log Feed yard loader. Other industrial noise sources identified during the attended audit included activities associated with BORG

Prevailing weather conditions observed during the day and evening audits varied with winds from the west-north-west (<3m/sec) and temperatures between 6-10°C. During the night audit winds were calm to light from the north-west(<3m/sec) at about 2340 hours a temperature inversion developed, temperatures ranged between 0-2°C.

Measurements during the audits confirmed that the HPP $L_{Aeq,\ 15\ min}$ noise contributions to the ambient levels could not be measured directly for comparison with the Licence Conditions. In terms of applying the *INP* modifying correction factors no sources were identified that required tonal, low frequency, impulsive or intermittent adjustments. From the findings of the attended audits the results *(Table 3)* demonstrate compliance with the EPA Environmental Licence Noise Limits *(Table 1)*.

ATKINS ACOUSTICS & ASSOCIATES PTY LTD.

ATTACHMENT 1. REFERENCE MEASUREMENT LOCATIONS

APPENDIX I

2021 EPA NOISE UPDATE – EPA CONDITION E1.1 (EPL11229)

Highland Pine Products Pty Ltd
ACN 093 059 404

14/12/21

NSW EPA

Electronic – EPA Hub

info@epa.nsw.gov.au

Re: Annual Update – Condition E1.1 (Noise PRP) - EPL 11229.

Dear Sir/Madam,

As required under special condition E1.1 of the abovementioned EPL, the following noise mitigation work (**Table 1**) has been undertaken by HPP during the reporting period. It should be noted that for the majority of 2020-21, site access has been restricted due to the impacts from Covid.

Task	Location	Type	Target Reduction
Install transfer roller table.	Greenmill	Elimination	Impact noise source - Large timber sections previously dropped into a conveyor as part of transfer resulting in an impact noise.
Steam pipe lagging.	Boiler	Attenuation	Controlled ambient - Steam pipes lagged to improve thermal efficiency but also provide noise attenuation specifically at areas of directional change.
Install compressor.	Drymill	Attenuation	Controlled ambient - New plant and sound reduction enclosure.
Install air dryer.	Boiler	Attenuation	Controlled ambient – New plant, technology and design – less noise generated via discharge from dryer.
Install Hebel sections.	Logyard	Attenuation	Controlled ambient – Replaced ply sections in sound wall with hebel to improve attenuation.
Noise curtain.	Drymill sticker infeed	Attenuation	Controlled ambient and impact noise – installed noise curtain on Drymill sticker conveyor to reduce noise breakout from Drymill building.
Noise curtain.	Greenmill stacker re-entry	Attenuation	Controlled ambient and impact noise – replaced noise curtain on Greenmill stacker re-entry conveyor to reduce noise breakout from Greenmill building.
Traffic control loop.	Greenmill bearer unscrambler and sticker conveyor building	Attenuation	Controlled ambient and impact noise – Installed traffic control loop to roller door. Door now automatically opens and closes based on forklift traffic in area reducing breakout from the Greenmill operations.
Reverse beepers.	Site	Elimination	Irregular and tonal noise – Ongoing removal of high-volume reverse beepers on all plant to low volume squawker type.

Table 1 – HPP noise mitigation works.

Highland Pine Products Pty Ltd
ACN 093 059 404

Nose Assessment 2021.

The 2020-21 attended monitoring noise report completed by Atkins Acoustics and Associates Pty Ltd has shown;

- Compliance at the three locations where the site has historically completed testing.
- The result was impacted by a temperature inversion during the night time period.
- No HPP sources during testing were identified that required tonal, low frequency, impulsive or intermittent adjustments to be made to the result.
- There are a number of external contributors to noise impacts at sensitive receptors including traffic, other industry and wildlife.

I have attached the Atkins report for your records.

Table 2 details historical noise monitoring results across all three locations.

Detail		Reference $L_{Aeq15min}$			
		Consent Limit 55dB(A)	Consent Limit 50dB(A)	Consent Limit 50dB(A)	Complies
Reporting year	Reference Location	Day 7am-6pm	Evening 6pm-10pm	Night 10pm-7am	
2015/16	1	48	47	46	Y
	2	48	49	47	Y
	3	44	44	36	Y
2016/17	1	51	49	49	Y
	2	54	51	51	N
	3	57	52	48	N
2017/18	1	36	36	47	Y
	2	36	39	46	Y
	3	35	35	45	Y
2018/19	1	40	38	48	Y
	2	45	48	48	Y
	3	40	45	47	Y
2019/20	1	45	45	46	Y
	2	45	45	48	Y
	3	40	45	40	Y
2020/21**	1	45	45	46	Y
	2	45	45	46	Y
	3	46	46	50	Y
Note A temperature inversion formed during night time testing.**					

Table 2 – Historical noise results (By location).

Activities Planned for 2022.

Given recent results have shown good compliance with current EPL limits and marginal non-compliance with the 2024 night-time noise target of 45dB(A) $L_{Aeq15min,}$ the following actions will be the focus for the 2021/22 reporting period.

- Complete nose testing as per EPL requirements.
- Complete modeling to determine the HPP contribution at sensitive receptors.
- Finalise options for further attenuation at the Greenmill and Logyard.
- Engage with Dept of Planning on aligning the DA and EPL noise limits.
- Continuation of attenuation (minor works) program. Attenuate at the source to improve near field monitoring results.
- Assess mitigation options as part of capital upgrades to plant and equipment across the site.

Highland Pine Products Pty Ltd
ACN 093 059 404

The 2022-23 attenuation plan may require significant capital works in key operational areas of the plant, including the Greenmill and logyard. Modelling in Q1 2022 and the results of historical testing will provide the background to support the decision-making process.

The management, application and auditing of administrative controls (Greenmill, Drymill and sticker conveyor doors closed at night, restriction of certain activities outdoors after hours) is on-going and demonstrated as effective, with no noise complaints received during the reporting period.

Please contact me on the detail below should you require anything further.

Kind regards,

Spiro Kavalieros
Environmental Consultant
EHSR Group
On behalf of
Highland Pine Products Pty Ltd.
E: Spiro.kavalieros@highlandpine.com.au
Ph: 0418889420

APPENDIX J
ENVIRORISK 2021 IEA – HPP DA and EPL

EnviroRisk

APPROVALS - SUSTAINABILITY - COMPLIANCE

INDEPENDENT AUDIT REPORT

Planning and Environmental Compliance

Oberon NSW,
***OCTOBER* 2021**

for

Highland Pine Products Pty Ltd

AUDITING METHOD

This audit report is based on a representative sample of systems and information using the *'evidence and risk based approach*' as provided for in AS/NZS ISO 19011:2018 *Guidelines for auditing management systems*. This approach was adopted to verify that environmental risks are being systematically addressed in accordance with the audit criteria as specified in the audit scope section of this report.

Information presented within the Report relies on:

- the completeness and accuracy of information provided by those personnel available for interview (after reasonable professional interrogation of the accuracy of such information); and
- the condition of the site as observed during the day(s) of the site inspection. Note due to COVID restrictions the site inspection was undertaken via photographic evidence provided by site personnel; and
- the completeness and accuracy of records, monitoring data and previous reports that were within the system or made available to support Audit enquiries (where applicable).

It is emphasised that this Audit is a 'snapshot in time' and environmental conditions, business operations and/or management practices may vary at times following the audit period. The detail provided within the audit report largely reports by exception; discussing areas identified for improvement far more than when commendable practices were observed and/or verified. This approach is considered to provide a more concise report, with a focus on continuous improvement.

The Audit Report is intended for those named on the distribution list. The Audit report should only be reproduced and distributed in full.

GENERAL INFORMATION

Audit No:	211115
Audit Title:	Independent Planning and Environment Audit
Location:	Site 2, Gate 3 Albion Street, Oberon
Audit Period:	July 2019 - June 2021
Audit Completed By (Lead Auditor):	
Name:	Stephen Jenkins
Company Details:	EnviroRisk Management Pty Ltd ABN 24 069 947 904 PO Box 183 LARA 3212 Ph: 03 5282 3773
Certifications	CEnvP #179, EPA Appointed Industrial Facilities Auditor (Vic)
Audit Team Members:	Lok Nethercott – CEnvP #344, Exemplar Global Certified Environmental Auditor
Client Representative	
Name:	Mr Michael Bitzer
Title:	General Manager, Highland Pine Products Pty Ltd
Auditee Personnel	
Spiro Kavalieros	Environmental Consultant
Ben Gawehn	Site Services Manager
Report Distribution	
Stephen Jenkins	EnviroRisk Management Pty Ltd (Master Copy)
Michael Bitzer	General Manager, Highland Pine Products

DOCUMENT CONTROL

REVISION NO.	SUMMARY OF AMENDMENTS	REVIEWED BY	ISSUED BY	ISSUE DATE
R0		S Jenkins	L Nethercott	15 Nov 2021

TABLE OF CONTENTS

ABBREVIATIONS

ABBREVIATION	DESCRIPTION
AEMR	Annual Environmental Management Report
AS/NZS	Australian and New Zealand Standard
CEnvP	Certified Environmental Practitioner
DA	Development Application
DC	Development Consent (issued by DUA&P) – now DPE
DPE	NSW Department of Planning and Environment
EMP	Environmental Management Plan
EPA	NSW Environment Protection Authority
EP&A	Environmental Planning and Assessment
EPL	Environment Protection Licence (issued by EPA)
IAR	Independent Audit Report
LMP	Landscape Management Plan
OFI	Opportunity for Improvement
OH&S	Occupational Health and Safety
ML	Megalitre
PM	Preventative Maintenance
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act, 1997 (NSW)
PPE	Personal Protection Equipment
SEPP	State Environmental Planning Policy
SOP	Standard Operating Procedure
SWMP	Stormwater Management Plan
WMP	Waste Management Plan

EXECUTIVE SUMMARY

EnviroRisk Management Pty Ltd (EnviroRisk) was engaged by Highland Pine Products Pty Ltd (HPP) to undertake an independent audit of environmental performance and compliance with conditions of their Development Consent (DC) (#403-11-00) and Environment Protection Licence (EPL) 11229 for their Site 2 sawmill facility located off Gate 3 Albion Street, Oberon NSW.

An independent audit is required every three years under Condition 6.3(a) – (f) of the Development Consent issued by the NSW Minister for Urban Affairs and Planning in 2001. The audit was conducted generally in accordance with AS/NZS ISO 19011:2018 *Guidelines for auditing management systems*.

Due to COVID-19 restrictions during the audit period, travel to the site was not possible. As such the documentation review was undertaken remotely, specific photographic evidence requested by the auditor was provided by HPP electronically, and a video conference was held in mid-October 2021 to interview site management and related personnel.

The audit team held particular expertise in air, waste and noise. During the audit site personnel were interviewed, documentary evidence such as reports, data, records and procedures were sought and examined[1], and an inspection of the site and surrounds via photographic evidence was conducted. Further evidence was provided prior to the site visit and during the week following the video conference.

After consideration of the audit objectives and based on the findings (as detailed in the audit protocol attached at **Appendix 3**), the following conclusions were made:

AREA	FINDINGS
Compliance	▪ There are eight (8) Development Consent conditions where strict compliance could not be demonstrated, with many of these non-compliances relating to administrative requirements within conditions; and ▪ There is one (1) condition of the EPL where strict compliance could not be demonstrated. Although non-compliances exist, the site operations are substantially compliant with conditions of the Development Consent and Environmental Protection Licence relating to pollution control and amenity protection. Recommendations for improvements to resolve compliance aspects are provided in the **Table E1** below.
Air Emissions	Stack testing of emissions by independent monitoring company Ektimo in September 2019 and July 2020 reported particulate matter (PM) concentrations of 220 mg/m3 and 230 mg/m3 which are both below the 250 mg/m3 EPA Licence limit. Correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure. Correspondence from Ektimo provided a correlation calculation formula between the Continuous Emissions Monitoring System (CEMS) and PM concentrations (dry STP stack CO2). Applying the formula against CEMS results returns a concentration of approximately 229 mg/m3 which equates to 250 mg/m3 from the stack, and therefore enables CEMS to provide a realistic real time response on whether compliance is likely being maintained. A sample of CEMS data enables the Auditor to have confidence that the site has maintained compliance with PM air emission limits.

[1] Where multiple records or data reports were available, a sample was examined using standard audit evidence sampling methods.

	Commendably, since the last IEA the site has undertaken a review of the boiler operating system with a number of SOPs now in place to improve compliance assurance.
Noise	Specific photographic evidence revealed the doors along the Drymill wall and at the Drymill re-entry being kept closed and thereby assisting to attenuate noise. The photographic evidence also revealed that adjacent to the Drymill re-entry is a sticker conveyor where the rubber curtain (which acts as a noise attenuator) has been damaged allowing noise to escape. A long-term noise reduction program continues to be implemented as is required under the EPL. Noise reports conducted in 2019 and 2020 reveal that the site complies with the EPL limits specified. However estimated HPP contribution (LA10) to measure the timber complex noise is estimated to be above the DA-403-11-00 specified measurement criteria of 41 dB LA10 15min for the night period at locations 26 Cunynghame Street West and 12 Herborn Street. No current complaint remains open with regard to noise and no complaints have been received by the community during the audit period suggesting the site overall is doing a commendable job to control nuisance noises such as impulsive, intermittent and tonal occurrences at the sawmill.
Waste	Significant improvements in the management of waste in accordance with the waste hierarchy have occurred since the previous audit. Of particular note, a system has been developed for management and control of H2 waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber is now captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill. A proposal has been developed and is currently being implemented to avoid sending ash to landfill and recycle as a soil reconditioner. It is estimated that this will reduce the volume of waste to landfill by 30%.
Environmental Systems and Plans	A number of commendable efforts aligned with improvements to environmental systems and plans have included: ▪ The site management team undertaking pollution incident management response training; ▪ Management reviews of the EMP with specific involvement from the newly appointed site manager (beginning of 2021); ▪ Management understanding of the environmental policy and commitments to improving environmental performance; ▪ Weekly management meeting where environmental items are addressed and corrective actions implemented; ▪ Entering of environmental compliance items into the site Risk Manager™ system to ensure these items are actioned, followed up and closed out. Minor changes are required to the Plans including clarification around reviews and updating the statutory obligation section (specifically the EMP), and demonstrating consultation with the Oberon Council in preparing the plan (specifically the SWMP). Confirmation of approval from DPE of the WMP and the LMP is also required.
Environmental Performance	Environmental performance has been assessed against the objectives contained within the EMP. Using a subjective 1-5 scale rating system for each objective, the audit has found that the site has achieved an overall environmental performance score of 87%.

Recommendations for Improvement

Improvement recommendations are summarised in **Table E1** below. The recommendation numbering has been structured to assist identify whether the recommendation arises from the Development Consent, the Environmental Protection Licence or a systems element. To assist in the illustration of some recommendations, a pictorial summary of observations is provided, including many commendable practices observed.

TABLE E1: 2021 INDEPENDENT ENVIRONMENTAL AUDIT RECOMMENDATIONS

No.	RECOMMENDATIONS	DC / EPL REFERENCE	PRIORITY[1]
DA 403-11-00			
DC:21-1	HPP pursue modification of existing planning consent conditions that are no longer applicable as part of a planning permit application for future proposed works at the facility.	DC 1.10	High
DC:21-2	During the next EMP update, review the references section to ensure it specifies relevant Acts and Regulations applicable to the site.	DC 3.3(b)	Low
DC:21-3	Update the References list in the EMP to include: ▪ Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018; ▪ Protection of the Environment Operations Act 1997; ▪ Protection of the Environment Operations (Clean Air) Regulation 2021; ▪ Approved methods for the modelling and assessment of air pollutants in NSW 2016; ▪ NSW EPA, Approved methods for the sampling and analysis of air pollutants in New South Wales 2006; and ▪ Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017	DC 3.3(b)	Low
DC:21-4	Update the EMP to include specific units of measurement (consistent with EPL 11229) within the Groundwater Environmental Monitoring Requirements	DC 3.3(c)	Low
DC:21-5	Update the EMP to include the current version of EML 11229	DC 3.3(c)	Low
DC:21-6	Undertake annual update of the onsite Community Complaint Logbook.	DC 3.3(e)	Low
DC:21-7	Update the EMP to reference or link to site safety systems.	DC 3.3(e)	Low
DC:21-8	Update the EMP to either remove references to the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' if these positions do not exist, or, if the positions do exist to define the roles and responsibilities of the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' and any other roles described in the EMP.	DC 3.3(f)	Low
DC:21-9	Issue a copy of the current EMP to Oberon Council.	DC 3.4	High
DC:21-10	Update the EMP to provide a consistent requirement for review frequency.	DC 3.5	Low
DC:21-11	As part of recommendation DC21-1 above seek to have specified noise measurement criteria in the DA aligned with criteria specified in EPL 11229. If this cannot be achieved, develop and implement noise attenuation strategies to bring measured noise from the HPP facility within the DA-403-11-00 specified measurement criteria of ‘41 LA10 15min dB for the night period.	DC 4.1	High
DC:21-12	Replace the damaged rubber curtain at the Drymill re-entry sticker conveyor to contribute to noise attenuation from this area.	DC 4.3	Low
DC:21-13	Ensure that all boiler fuel wood and timber product is stored inside the bin to reduce impact into adjacent stormwater system.	DC 4.4	Low

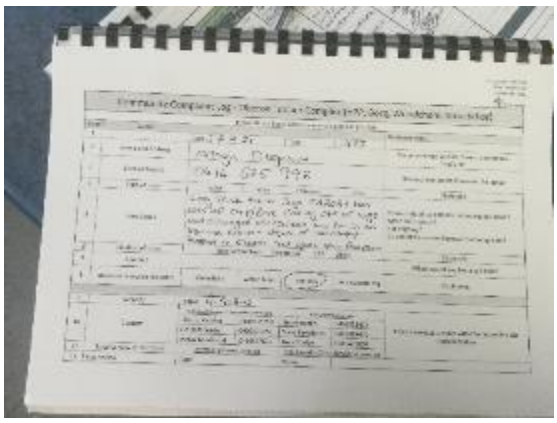
DC:21-14	Place additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be tarped before leaving the site.	DC 4.6	Low
DC:21-15	Seek consultation from the Oberon Council on the current version of the Stormwater Management Plan.	DC 4.9	High
DC:21-16	Seek DPE approval of the current version of the Waste Management Plan.	DC 4.12	High
DC:21-17	Seek DPE approval of the current version of the Landscape Management Plan.	DC 4.20	High
DC:21-18	Include in monitoring results tables in the AEMR's the criteria against which monitoring parameters are assessed (i.e. 250 mg/m3 for Total Solid Particles (TSP) and 2500 mg/m3 for NOx).	DC 5.1(d)	Low
EPL 11229			
EPL:21-1	Engage a contractor as soon as reasonably practicable to clean out the gross pollutant traps and empty the overtopping oil container at the fuel station.	EPL L1.2	Medium
EPL:21-2	Improve plant design compliance with the ANZS 2843.1 Standard including: a) Part 1 Section 2.4 Water Bodies: Install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps.	EPL O4.1	Medium
ENVIRONMENTAL SYSTEM IMPROVEMENTS			
EMS:21-1	Add HAZCHEM signs to all entry points as per the regulations so that they are clearly visible.	-	Low
EMS:21-2	PIRMP signage be secured to wall for easy access.	-	Low
EMS:21-3	Arrange for drums to be removed from the empty drum storage as soon as COVID lockdown lifts. Also add signage at the drum storage area that all drums must be stored within the bund.	-	Medium
EMS:21-4	Relocate bulk ink containers in the Drymill to be stored in a bunded area	-	Medium
EMS:21-5	Improve the labelling on greaser lube containers in the Green Mill to include pictograms and hazard classifications.	-	Medium
EMS:21-6	Add into the preventative maintenance system (MEX) the maintenance of the diesel bulk storage tank, bund pump, alarm system and plate separator.	-	Low
EMS:21-7	Add into the preventative maintenance system (MEX) the regular clean out of the oil collection drum under the plate separator at the bulk diesel tank.	-	Low
EMS:21-8	Provide training to operators that wood waste suitable for recycling is not to be placed in the general waste bin.	-	Low
EMS:21-9	Update signage at gas bottle storage areas and ensure that all gas bottles are chained.	-	Medium
EMS:21-10	Review appropriate disposal option for aerosol cans in accordance with applicable regulations and update the Waste Management Plan (WMP) to include this option.	-	Low
EMS:21-11	Review recycling opportunities for waste plastic strapping to avoid disposal through general waste bin and update the Waste Management Plan (WMP to include this option.	-	Low
EMS:21-12	Update the EMP's objectives to include achieving compliance with applicable legal and other requirements (i.e. the DA and EPL).	-	Low

1. **Priority** is rated as follows: **High** - to be completed over the next 3 months; **Medium** – to be completed over the next 12-18 months; **Low** – to be completed before the next triennial audit.

Opportunities for improvement (OFI) have been rated as a Low priority. Compliance items have been rated either a High or Medium priority for action. Refer to Audit Protocol for detail as to the applicable compliance item and the rationale behind each recommendation.

PICTORIAL SUMMARY

Community complaint signage – called the number all worked. Security answered the call



On site complaint book was observed to be in use. A couple of recent (Sept) complaints show the system is in use. Note: complaints were not related to HPP but other part of greater Oberon Timber complex

Bulk oil store was observed to be bunded and clean. SDS up to date. Current SDS's available.

Woodchip pile – no observable evidence of any blue stained timber in pile demonstrating that site improvements to management of H2 timber waste have been effective.

The waste management system for H2 treated timber has been updated since the last audit and operators are trained to ensure H2 dockings are not munched for fuel. H2 is now transferred to Borg under a beneficial reuse program for reuse in the manufacturing of particleboard.

Empty drum storage is overflowing as the drum recycler has been unable to access the site due to COVID restrictions (initially in Sydney Metro but more recently due to regional NSW lockdown including Oberon).

Signage OK regarding chemicals

Additional chemical storage cabinets located on site. Also sighted in maintenance store Class 2.1 (aerosols) and Class 3 (liquids) across site.

SDS's – 3 full sets across site – 1 in gatehouse, 1 in Maint Workshop and 1 in Dry Mill control room – Updated annually. Site uses Chemwatch for electronic storage of SDS's.

Each location also has a folder of SDS's specifically for chemicals stored in their area.

1. 

2. 

1. Site 2 Drymill – ink was observed to be stored in small packets outside bund
2. Site 2 Drymill – Bunded oil storage – clean/tidy – small volumes only stored.

Site 2 DM spill kits located in strategic locations. There is an 8 week service of kits provided by external supplier with product kept at the site store in case of top-up required.

Site 2 maintenance workshop – generally well maintained




H2 treatment batch plant observed to be in a generally tidy condition. The plant is bunded and maintained. Hoses kept within bunded area There has been no down gradient GW well installed.

Currently epoxy coating and floor joints look in good condition.

Alarms in bunds work – checked. In the event of an overflow reaching the sump in the bund, an alarm rings in gatehouse (manned 24 hrs)


Diesel Bulk Storage tank – Self bunded tank – minor spills/leaks are captured in the adjacent plate separator. There is no documented evidence of routine maintenance. Appears to be on an ad- hoc basis when people complain about water in bund etc.

Note oil collection drum overtopping.

Boiler site 2 Fuel shed. Significant improvement has been made with housekeeping in this area. The Fuel Bin side doors appear to remain shut as is evidenced by the fuel bin roof not being covered in woodchip.

Opacity monitor correlation between opacity and particulate concentration adjusted as per the 2019 audit recommendations. However it is still only a guide not a compliance measure.

Boiler Operators screen with an SOP developed and attached in Doc file providing guidance to operators on how to manage upset conditions.

Lagging completed as per 2019 audit recommendation.

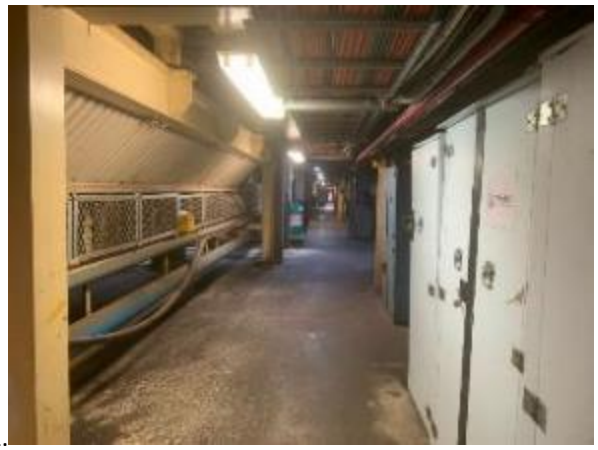
Lagging is still on-going around pipework as it is being repaired.

Scrap steel bin – Blue as specified in the WMP

Aerosols were observed to be in scrap steel bin.

Greasers shed – appears to be in good condition

Gas bottles stored in caged area however signage needs to be updated and bottles were not all chained

1. 

2. 

3. 

4. 

5. 

1. Green mill basement – well maintained – no issues observed
2. Green mill basement – bunded to control discharge in the event of a loss.
3. Green mill basement – good management of lube oils along the length of the green mill.
4. Green mill greaser lube containers need labelling improvements
5. Green mill basement – good storage of chemicals.

Waste management – as per the WMP – H2 treatment waste stored in bins that go to reuse at Borgs.

1.

2.

1. General Waste bin – red as per WMP
2. Wood waste suitable for recycling in the general waste bin (Red)

Truck was observed to be tarped while removing residues from site.

Stormwater channel reaches.

Large volume of sawdust captured in gross pollutant traps along all channel reaches. The site has been unable to engage external vac trucks to clean out gross pollutant traps for three months (Sydney lockdown, then regional lockdown). There is no available resource with suitable equipment in western NSW.

Estate maintenance – some work required

Maintenance company based in Bathurst maintains estate under contract. However they have not been able to come to site since August due to restrictions in travel initially put on Bathurst residents then Oberon residents once it went into lockdown. It is proposed that the person will be engaged after the 11th October 2021.

Reach #1 – wood residue into stormwater system. maintained by bobcat.

Triple interceptor – cleaned and maintained. Inflow into channel reach 1.

	Bark Bin. Generally housekeeping in the area is ok.
	Fuel bin – product stored outside bunker area.
	Water storage dam. Aerators working – no odour evident.
	Maintenance workshop – good housekeeping.

1.

2.

1. Exits along Drymill – closed (noise control).
2. Drymill re-entry – closed. Noise management

Adjacent to the Drymill re-entry is a sticker conveyor. Noise attenuator (rubber curtain) damaged allowing noise to escape..

1.0 INTRODUCTION

EnviroRisk Management Pty Ltd (EnviroRisk) was engaged by Highland Pine Products Pty Ltd (HPP) to undertake an independent audit of environmental performance and compliance with conditions of their Development Consent (DC) (#403-11-00) and Environment Protection Licence (EPL) 11229 for their Site 2 sawmill facility located off Gate 3 Albion Street, Oberon NSW.

The audit is to be undertaken every three years as required under Condition 6.3 (a) – (f) of the Development Consent (DC) issued by the NSW Minister for Urban Affairs Planning in 2001. Condition 6.3 (a) – (f) states:

Within 12 months of conclusion of commissioning of the development, and every three years thereafter, unless the Director-General otherwise directs, the Applicant must commission and pay the full cost of an Independent Environmental Audit. The Independent Environmental Audit must:

(a) Be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Director-General;

(b) be consistent with ISO 14010 - Guidelines and General Principals for Environmental Auditing, and ISO 14011-Procedures for Environmental Auditing, or updated versions of these guidelines/manuals;

(c) Assess the environmental performance of the development, and its effects on the surrounding environment;

(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;

(e) review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring Program; and if necessary,

(f) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.

EnviroRisk conducted a previous compliance audit in June 2019. The objective of this 2021 independent audit was therefore to meet the "three years thereafter" audit requirement, and to address consent Conditions 6.3(a) – (f) above.

A copy of the audit team's independence statement and the endorsement by the Director General of the auditor to commence the audit is attached within **Appendix 1 and 2**.

Exclusions: Site 1, which is not located within the development consent area.

2.0 AUDIT OBJECTIVES

The objectives of the audit were to:

a) assess the environmental performance of the project;

b) assess whether the site is complying with the conditions of the DC and the EPL;

c) review the adequacy of any system, plan or programme required under the DC; and

d) recommend measures or actions to improve the environmental performance of the site and any system, plan or programme reviewed in c) above;

The audit was conducted generally in accordance with AS/NZS ISO19011:2014 *Guidelines for auditing management systems* and the NSW guidelines *Independent Audit – Post Approval Requirements, June 2018* issued by the Department of Planning and Environment.

3.0 SCOPE OF WORKS

The audit (as defined under AS/NZS ISO19011:2018) includes the sawmilling and timber treatment operations on Site 2 of the Albion Street, Oberon timber complex owned and operated by HPP. It includes associated facilities (boiler, logyard, storage, bifenthrin treatment plant etc.), activities (training, monitoring, maintenance) and surroundings where included within the Development Consent (DC) and Environment Protection Licence (EPL).

The temporal period covered is from the date of the previous audit (i.e. post June 2019) to 30 June 2021.

Due to the COVID-19 situation in NSW, travel to the site was not possible during the audit assessment period (i.e. July 2021 – September 2021) due to government restrictions. As such the Audit was undertaken as per the following scope of works:

1. Desktop documentation review: relevant documents were obtained for review, including copies of the most recent versions of plans prepared as required under the DC, and the included modifications referred to in the previous section of this report;
2. Audit Preparation: a draft audit plan setting out the work schedule of the audit was prepared for client review and finalisation; an audit protocol (checklist) was prepared that identified and tabulated all the audit criteria to be used by the audit team during the audit;
3. Site Component: an opening meeting with relevant client personnel was convened online; a site inspection was conducted via specific photographic evidence requested by the auditor and provided by the site to familiarise the audit team with the sawmill and associated areas; interviews with key operational personnel were conducted via web video and verifiable evidence sought against all audit criteria listed in the protocol; following an audit team review meeting draft findings and recommendations were provided to HPP management for review and discussion of any other relevant matters;
4. Reporting: a draft audit report was prepared detailing all relevant information concerning the audit, including the attached completed audit protocol, reference to evidence sighted, photographs where applicable, and tabulated non-compliances/ improvement opportunities and recommendations for improvement;
5. Quality Reviews: the draft audit report was quality-reviewed before issue for review/comment by the client; and
6. Finalisation: the finalised audit report issued.

4.0 AUDIT TEAM

The audit team comprised:

Mr Stephen Jenkins BAppSci, GradDipMgt (Project Director, Lead Auditor).
Stephen is the Director of EnviroRisk Management and is a Certified Environmental Practitioner and a Vic EPA-appointed Environmental (Industry Facility) Auditor (appointed pursuant to the Environment Protection Act, 1970). Stephen was formerly an operations scientist with the Nosie Branch of the Victorian EPA (1980's) and worked as an environmental risk manager with Richard Oliver Risk Managers before establishing EnviroRisk Management in 1995. He has conducted systems/risk audits of a large variety of sites including timber, waste, food processing, chemical, building and construction, automotive parts manufacturers, plastics, extractive and related industries.

Mr Lok Nethercott, BAppSci – EnvMgt, Example Global certified Environmental Auditor
Lok is the Regional Manager of EnviroRisk Management and is a Certified Environmental Practitioner and an Exemplar Global Certified Environmental Auditor. He has over 20 years of environmental management experience; first as an Environmental Project Officer with both the Department for Environment and Heritage SA and City of Charles Sturt Council, and later as the Business Environmental Manager for a large timber manufacturing company throughout NSW, VIC and SA. He has been with EnviroRisk Management for over fifteen (15) years. He has also conducted systems / risk / compliance based audits throughout Australia and across a range of industries including timber manufacturing, building and construction, port facilities and stock feed manufacturers.

Details of the audit team's capabilities were provided to the DPE with endorsement provided prior to the audit commencing and attached within **Appendix 1**.

5.0 METHODOLOGY

The following methodology was adopted for the audit:

5.1 AUDIT PLAN

A draft Audit Plan was prepared and sent to HPP. The Plan detailed the objectives, scope, team and criteria for the audit, along with a proposed schedule. Some administrative matters were also covered, and a list of documents for review prior to the site component was requested.

The requested documents were largely received for EnviroRisk review prior to the site inspection component.

5.2 SITE COMPONENT

Given the COVID 19 constraints, arrangements were made for specific photographic evidence requested by the auditor to be provided by the site and for a web based interview of personnel.

Audit team members worked together and separately with site personnel and engaged in web-based interviews, phone conversations, sighting of documentary evidence presented by HPP to verify compliance with the audit criteria (listed in the Protocols within **Appendix 3**), and photographic inspections of relevant parts of the site. The following parts of the site were inspected:

- Storage and handling areas;
- Drymill and Green mill operations;
- Blue frame (H2 Bifenthrin) timber preservative storage, blending and application;
- Boiler, fuel shed and kiln activities;
- Gatehouse areas;
- Noise walls and building enclosures, roofed areas of the fuel shed and the Drymill;
- Logyard and wood fuel storage;
- Maintenance workshop and greasers shed; and
- Surface water drainage channels and ponds.

Evidence gathering progressed by identifying and evaluating available documentation and records relating to environmental performance and DA and EPL Licence conditions.

This entailed discussions with site personnel and review of written and communicated processes. It also included the review of monitoring activities and establishing the veracity and completeness of obtained records, reports, data, drawings, etc.

Where multiple records of similar format were available as evidence, judgement-based sampling was employed as appropriate. Where deficiencies were identified in the availability of data, plans or information to adequately perform the audit, and where such information was vital to completing the audit report, additional data were sought where reasonable to do so.

External stakeholders within the community were not contacted for this audit. Regulators were communicated with prior to audit commencement (specifically DPE) who advised there were no specific concerns or complaints that had been brough to their attention.

The Lead Auditor and Environmental Auditor completed the process of interviews, evidence sighting and photographic evidence review of specific areas. At the completion of the audit draft preliminary findings of the audit team were provided by the Audit team to HPP management for review and feedback. Commendably, HPP's management representatives (including the site manager) and the site's environment consultant attended the briefing.

Further documentation was provided and reviewed over subsequent weeks during which the audit report was prepared. A draft of the report was provided for review prior to finalisation and submission.

6.0 AUDIT CRITERIA

The audit protocol (**Appendix 3**) lists the audit criteria in the first and second columns of the Tables. The primary criteria are the applicable conditions contained within the DC (DA-403-11-00) and EPL No. 11229 (version: 17 February 2021). Secondary criteria against which checks were made during the audit include legal and other requirements, Regulations or guidelines not otherwise referred to in the DC and EPL and which apply in the context of compliant environmental practice.

The other columns in the table list the auditor's findings comprising in turn:

- the evidence sighted,
- the auditor's findings and recommendations, and
- a determination of compliance against each approval/licence condition[2].

Those items verified through direct observation (via specifically requested photographic evidence) are displayed in the Pictorial Summary (following the Executive Summary above). Photographs may also indicate observations for which improvement recommendations have been made, and examples of commendable environmental practice observed.

7.0 FINDINGS

The following sub-sections summarise the audit findings for each significant environmental category requested to be canvassed by stakeholders during initial communications.

Compliance findings, along with a description of the Auditors findings against the evidence presented, were made against each line item condition of the DC and the EPL and are provided in the Audit Protocol (refer **Appendix 3**). In determining compliance, reference was made to the content and implementation of associated plans and the implementation of systems necessary to action these plans e.g. EMP, PIRMP, SWMP, WMP and LMP plus management system elements such as preventative maintenance plans, training programs, records etc.

Compliance was determined applying the methods provided in the 'Independent Audit-Post Approval Requirements' guidelines.

The audit report documents where strict compliance with DC and EPL conditions could not be demonstrated. The audit found that whilst strict non-compliances exist, site operations are substantially compliant with the pollution control and amenity- based conditions of both the DC and EPL. This is verified by the absence of any community complaints for more than 24 months.

Recommendations for improvements to resolve compliance aspects have been listed as a line item within the Audit Protocol. Recommendations have been extracted and are tabulated against the relevant consent, licence or system element within **Table E1 – refer**

[2] Where a condition does not apply at the time of the audit, a "Not Applicable" compliance status in entered

to Executive Summary), along with an opinion made by the Auditor as to the priority for rectification action.

It is expected HPP will include recommendations into their Risk Manager™ (or equivalent) system to track implementation and enable close out when complete.

7.1 DEVELOPMENT CONSENT ADMINISTRATIVE ITEMS

7.1.1 Legacy Development Consent Conditions

The 2015 IAR identified DC conditions that should have been addressed within the initial years of the approval. HPP acted on a recommendation within that audit and requested DPE to review and provide guidance on whether outstanding legacy conditions were still relevant. DPE responded via letter dated 17/8/16 clarifying some aspects of the DC conditions were relevant and suggesting that HPP progress an amendment via a S75W application in order to resolve some compliance issues.

Following the previous Audit Recommendations (EnviroRisk 2015 and EnviroRisk 2019), HPP further liaised with DPE in late 2019 / early 2020 regarding the modification of consent conditions. Reportedly, these discussions were prolonged and seeking a modification of consent conditions at that time was parked due to the challenges associated with COVID 19.

The site has advised that there are future potential changes at the site that will require a planning permit and so will review modification to the existing consent conditions as part of that application process.

As such a recommendation has been made in this 2021 IAR for HPP to pursue modification of existing planning consents as part of a planning permit application for future proposed works at the facility.

7.2 AIR EMISSIONS

7.2.1 Products of Combustion – Particulates and Smoke

Air emission compliance was again a focus of the audit. Since installation and commissioning in around June 2017, the overfired air system has improved emissions demonstrated by independent stack monitoring undertaken by Ektimo in September 2019 and July 2020 which reported concentrations of 220 mg/m^3 and 230 mg/m^3 which are both below the 250 mg/m3 EPA Licence limit.

Since the previous audit, correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure. In correspondence from Ektimo (dated 21 April 2021), a correlation calculation formula between the Continuous Emissions Monitoring System and PM concentrations (dry STP stack CO2) was provided. Based on these formulas it indicates that the CEMS concentration of approximately 229 mg/m3 equates to 250 mg/m3 from the stack. The CEMS is therefore providing a reasonably accurate means to assess compliance, albeit

underestimating emissions by approximately 8%. This margin was recognised by the site and CEMS action trigger levels of under 20% opacity were being applied.

Since the last IEA the site has undertaken a review of the boiler operating system with a number of SOPs now in place (refer to section 7.2.3 below).

7.2.2 Products of Combustion – Nitrogen Oxides (NOx)

Stack testing over the past 2 years reveals that NOx concentrations were all well below the EPL limit.

7.2.3 Boiler Combustion Efficiency Assessment

The 2019 IEA included a specialist review of boiler combustion efficiencies and air emission compliance control. This 2021 IEA followed up on the recommendations of the 2019 IEA and revealed commendable efforts in reviewing and implementing controls to improve boiler efficiencies including:

- A review of the boiler control system was undertaken with managers and boiler operators to determine what was needed to be displayed on the boiler control system screen to enable operators to effectively manage controls. As a result a number of SOPs are now in place to provide guidance to operators in how to manage upset conditions including:
  - SOP: HP-S-KI-BO-10 Monitor Boiler Operations (dated 27/07/2016 and latest review was on 15/11/2019)
  - SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019)
  - SOP: HP-S-KI-BO-63 Correct Furnace Positive Pressure (dated 11/04/2018).
- The ability to adjust the mix of under-fire and overfire air in relation to percentage of the feed rate is available through the boiler control system screen.
- A review was undertaken with boiler operators which determined that they can't burn any closer to the furnace bed.
- An investigation of the feasibility of a bark hammer mill was undertaken and it was determined that this was not a viable option.
- A program has been established and has commenced in placing lagging around boiler pipes to assist in minimising heat loss and wasting energy and better fuel efficiency.
- A proposal has been developed and is currently being implemented to avoid sending ash to landfill and recycle as a soil reconditioner. It is estimated that this will reduce the volume of waste to landfill by 30%.

7.2.4 Dust

At monitoring locations #2, 3 and 4 total dust deposition was recorded at 4, 2.2 and 1.6 g/m^2.month mean annual average respectively for 2019 and 2.8, 1.7 and 0.9 g/m^2.month mean annual average respectively for 2020. These depositions results are equal to or below a residential investigation criteria of 4 g/m^2.month noting that the location of these gauges is not near a sensitive receptor. In the absence of complaint, results are likely to reflect background levels within the industrial estate.

Specific photographic evidence of the site requested by the Auditor revealed yard dust and wood dust/ shavings were largely controlled with limited risk of being blown beyond site boundaries. The Bark Bin area shows that housekeeping practices are keeping the area in a neat and tidy condition. The Boiler 2 fuel shed has the fuel bin door closed and resulting in no residual woodchip on the roof.

7.3 NOISE

7.3.1 Onsite observations

Specific photographic evidence of the site requested by the Auditor revealed the doors along the Drymill wall being kept closed and at the Drymill re-entry and thereby assisting to attenuate noise.

Photographic evidence also revealed that adjacent to the Drymill re-entry is a sticker conveyor where the rubber curtain (which acts as a noise attenuator has been damaged allowing noise to escape. It is recommended that this rubber curtain be replaced.

The EPL requires progressing noise reduction over the long term. Noise reports conducted in 2019 (Atkins and Associates, 2019) and 2020 (Atkins and Associates, 2020) reveal that the site complies with the EPL limits specified, whilst a long-term noise reduction program continues to be implemented. Based on the short to medium term noise attenuation works undertaken to date is on track to comply with the lower 2023 limit (i.e. 45 dB(A) night-time LAeq (15 Min)).

However estimated HPP contribution (LA_{10}) to measured ambient noise is estimated to be above the DA-403-11-00 specified measurement criteria of 41 dB LA_{10} 15min for the night period at locations 26 Cunynghame Street West and 12 Herborn Street. As part of further discussions with DPE regarding amendments to the DA it is recommended that HPP seek to have specified noise measurement criteria in the DA aligned with criteria specified in EPL 11229. If this cannot be achieved, develop and implement noise attenuation strategies to bring measured noise from the HPP facility within the DA-403-11-00 specified measurement criteria of ‘41 LA10 15min dB for the night period.

No current complaint remains open with regard to noise and no complaints have been received by the community during the audit period suggesting the site overall is doing a commendable job to control nuisance noises such as impulsive, intermittent and tonal occurrences at the sawmill.

7.4 ENVIRONMENTAL SYSTEMS AND PERFORMANCE AGAINST MANAGEMENT PLANS

A review was made of each of the plans [Environmental Management Plan (EMP), Pollution Incident Response Management Plan (PIRMP), Stormwater Management Plan (SWMP), Waste Management Plan (WMP), Landscape Management Plan (LMP)] during the audit as they related to compliance, including a sampling of implementation as a compliance check.

The site has made commendable efforts to update the EMP, SWMP, WMP and develop an LMP. Reportedly the EMP is in the process of being updated again with a new version due for completion later in 2021.

The EMP builds on earlier versions with the last update being in 2019 to incorporate the new ownership partner and revised structure of HPP. It caters for Site 2 activities (and the other sites managed by HPP). It contains an amendment record on iterations over the years.

Sampling of the PIRMP in the Risk Manager System found the incident response process robust. A PIRMP Notification Assessment (dated 29/11/2020) was reviewed for a fire incident demonstrating action taken and authorities notified.

Other commendable efforts aligned with the plans have included:

- The site management team undertaking pollution incident management response training;
- Management reviews of the EMP with specific involvement from the newly appointed site manager (beginning of 2021);
- Management understanding of the environmental policy and commitments to improving environmental performance;
- Significant improvements in the management of waste at the site with identified manufacturing processes and associated types of waste that are generated and how they are managed under the waste hierarchy. Of particular note, a system has been developed for management and control of H2 waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber is now captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill;
- Weekly management meeting where environmental items are addressed and corrective actions implemented;
- entering of environmental compliance items into the site Risk Manager™ system to ensure these items are actioned, followed up and closed out.

Minor changes are required to the Plans including clarifcation around reviews and updating the statutory obligation section (specifically the EMP) and demonstrating consultation with the Oberon Council in preparing the plan (specifically the SWMP). Confirmation of approval from DPE of the WMP and the LMP is also required.

7.5 PREVIOUS AUDIT: REVIEW OF RECOMMENDATIONS

A review of the 2019 Audit recommendations found that all bar five (5) recommendations had been closed out and three (3) were still in progress relating to the following:

- the legacy administrative non- compliances where clarification has been sought from DPE yet the issue remains ‘open’;
- update to the EMP to include current references of applicable Acts and Regulations applicable to the site;
- obtaining approval from DPE of the WMP;

- obtain approval form DPE of the LMP;
- works in progress on correlating opacity meter and particulate control levels; and
- the need to install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps.

These recommendations have been captured in this Audit report (refer to **Table E1 in the Executive Summary**).

7.6 INCIDENT REPORTING

The site's internal incident reporting and recording system was found to be effective in identifying, documenting and rectifying environmental incidents occurring during operational activities. The system followed a procedure outlined in the PIRMP which, under interrogation, was found to be known, utilised by staff with documented records available.

7.7 ANNUAL REPORTING

Annual environmental management reports and annual returns were noted to have been issued to both DPE and EPA each year over the audit period. No inconsistencies were identified in the Annual reports issued during the audit period that could represent a concern as to the accuracy or completeness of information contained.

7.8 COMPLAINT MANAGEMENT

The site provided evidence that it receives and acts on environmental complaints in a timely and effective manner. Commendably, no complaints have been received over the past 2 years, with no recorded complaints from the community over the past 24 months.

An environmental hotline number is displayed at the site entry to facilitate reporting. This number was tested during the audit and found to be functional.

A community consultation committee had typically been operating quarterly but Covid-19 and change in site management has meant that meetings had not been happening regularly in the last six months with only one meeting in 2021. Review of minutes of a previous meeting (March 2019) revealed that environmental issues are raised with removal of rubbish being the issue addressed in this meeting.

8.0 CONCLUSIONS

After consideration of the audit objectives and all the findings summarised in the preceding sub-sections, the audit conclusions are set out under the following three sub-sections.

8.1 Compliance

The audit found that the site is substantially compliant with the pollution control and amenity conditions of the DC and EPL. The audit has identified:

- sixteen (16) specific line item conditions of the Development Consent where strict compliance could not be demonstrated. Several non-compliances relating to unfulfilled historic administrative requirements and some conditions doubled-up on the same compliance item. Without the double-up of conditions that capture the same items (e.g. the general duty requirement, landscape plan), **eight (8)** separate line items of a non-compliance were identified against DC conditions; and
- two (2) line item conditions of the EPL where strict compliance could not be demonstrated. However, one (1) of these conditions related to the same element being the treatment plant compliance. Therefore, **only a single (1)** specific different item was identified relating to a non-compliant determination.

8.2 Environmental Performance

To evaluate environmental performance the criteria and objectives as set out in **Table 2** have been adopted and are considered appropriate for demonstrating good environmental practice and an assessment of their achievement has been based on the findings of the audit.

Using a subjective 1-5 scale rating system for each objective, the audit has found that the site has achieved an overall environmental performance score of 87%.

TABLE 2: ENVIRONMENTAL PERFORMANCE RATING

PERFORMANCE CRITERIA AND OBJECTIVES	COMMENT	RATING (1 – 5)				
		1	2	3	4	5
HPP's operations will comply with all controlling environmental regulations, licences and consent conditions.	Compliance issues identified					
Environmental impacts will be controlled within accepted limits as defined by regulatory agencies including Environmental Protection Agency (EPA) and the DPE NSW	Control improvements have been identified					
In the event of a failure to achieve objectives, frank and expeditious remedial action is implemented so impacts can be contained and operations corrected to prevent future failure	HPP issues have been expeditiously and frankly rectified					

8.3 RECOMMENDATIONS FOR IMPROVEMENT

Improvement recommendations have been set out within the Protocol and within this report and have been extracted, prioritised and then sequentially listed against consent and licence requirements within **Table E1** (**refer to Executive Summary)**.

9.0 REFERENCES

In addition to the documentary evidence listed in column 3 of the audit protocol at **Appendix 3**, the following references are cited in this report:

1. Independent Audit Post Approval Requirements Department of Planning and Environment, June 2018
2. Communication NSW Planning & Environment, Highland Pine Products (DA 403-11-00) Independent Environmental Audit 2021, Auditor endorsement letter 23/06/2021.
3. Environment Protection Licence 11229, 17 February 2021, NSW EPA.
4. Schedule 4, Standards of Concentration for scheduled premises: general activities and plant, Protection of Environment Operations (Clean Air) Regulations, 2010.
5. Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, EPA, 2016.
6. AS/NZS 2843.1:2006 Timber preservation plants Part 1: Timber preservation plant site design.
7. AS/NZS 2843.2:2006 Timber preservation plants Part 2: Treatment area operation.
8. Load Calculation Protocol, DECC, June 2009

APPENDIX 1 - AUDIT TEAM ENDORSEMENT

Mr Spiro Kavalieros
Director
EHSR Group Pty Ltd
51 Queen Street
OBERON NSW, 2787

23/06/2021

Dear Mr Kavalieros

Highland Pine Products (DA 403-11-00)
Independent Environmental Audit 2021

I refer to your submission of 15 June 2021 seeking approval of the audit team for the upcoming Independent Environmental Audit of Highland Pine Products (the development), in accordance with Schedule 2, Condition 6.3 of the development consent DA 403-11-00, as modified (the consent).

Having considered the qualifications and experience of the proposed audit team, the Secretary endorses the appointment of:

- Mr Stephen Jenkins, Lead Auditor;
- Mr Lok Nethercott, Assistant Auditor; and
- Mr Lee Armstrong, Assistant Auditor,

to undertake the audit in accordance with Schedule 2, Condition 6.3 of the consent. This approval is conditional on the audit team being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may wish to have regard to the Independent Audit Post Approval Requirements dated May 2020. A copy of the requirements can be located at http://planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements.

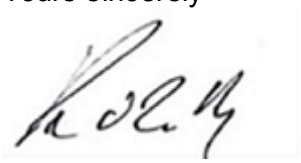
The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
3. not use the term “partial compliance”;
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

Within two months of commissioning this audit, Highland Pine is to submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Highland Pine review the report to ensure it complies with the relevant consent condition.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

APPENDIX 2 - AUDITOR DECLARATION

APPENDIX 2 – INDEPENDENT AUDIT DECLARATION FORM

Independent Audit Declaration Form	
Project Name	Highland Pine Products Sawmill Upgrade
Consent Number	DA 403-111-00
Description of Project	Extension of log yard, upgrade to green and dry mills
Project Address	Gate 2, Albion Street, Oberon NSW 2787
Proponent	Highland Pine Products Pty Ltd
Title of Audit	INDEPENDENT AUDIT REPORT – Planning and Environmental Compliance, Oberon NSW, OCTOBER 2021
Date	31 October 2021

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
ii. the findings of the audit are reported truthfully, accurately and completely;
iii. I have exercised due diligence and professional judgement in conducting the audit;
iv. I have acted professionally, objectively and in an unbiased manner;
v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and
b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Stephen John Jenkins
Signature	
Qualification	BAppSci, GradDipMgt, CEnvP
Company	EnviroRisk Management Pty Ltd
Company Address	30 Kees Road, Lara VIC 3212

APPENDIX 3 – COMPLETED 2021 INDEPENDENT ENVIRONMENTAL AUDIT PROTOCOL

DEVELOPMENT CONSENT - DA 403-11-00

AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD, OBERON

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
Legal Lot Description/ Identification	**DA Lot 10 DP 855384; Lot 86 DP 574012**	Previous 2015 audit outcome confirmed as still being current. Written communication DPE, 17/8/16. DPE letter stated not necessary to update.	Property descriptors changed in early 2000's with a subdivision Legal Description should read -Lot 10 DP 1017456		**C**
GENERAL - Obligation to Minimise Harm to the Environment	**1.1 Applicant must implement all practical measures to prevent or minimise any harm to the environment.**	Observation, Interviews, Documentation review, Data assessment.	This remains a broad statement. If there are non-compliances identified this condition must also be a NC. In the main, the auditor did not observe any material risk of harm to the environment. There are however further practical measures that can be actioned to minimise harm.	Refer to Specific Recommendations in this Protocol	**NC**
Terms of Approval	**1.2 The Applicant must carry out the development generally in accordance with:**	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Previous Audit found many items in compliance with a number held over for review as to applicability given the 18 years since approval was granted.		Refer to below
	(a) DA No. 403-11-00 submitted to the Department of Urban Affairs and Planning;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	HPP Wrote to DPE in 2015 (19/11/15, S. Kavalieros) and received a reply 17/8/16 (C.Ritchie, Director, Industry Assessment) stating what items may be closed out and what still remained unresolved. A suggestion to progress an amendment via a S 75W application was made by DPE.		**C**
	(b) SEE, titled "Statement of Environmental Effects- Highland Pine Joint Venture – Oberon, NSW", dated November 2000 and prepared by Highland Pine Products;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in previous audits and letter from DPE 2016.		**C**
	(c) Additional information, dated 12 April 2001, regarding issues at "Oorong" supplied to the Department by Highland Pine Products on 17 April 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in letter from DPE 2016		**C**
	d) Additional information, dated 12 April 2001 regarding predicted traffic movements for the proposed development, supplied to the Department by Highland Pine Products on 17 April 2001	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in letter from DPE 2016		**C**
	(e) Additional information. Dated 12 April 2001, regarding the construction schedule for the proposed development, supplied to the Department by Highland Pine Products on 17 April 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Letter DPE 2016		**C**
	(f) Site drawing- "Highland Pine Products Combined Site Layout Proposed Revision A" prepared by MICV Engineering Services Pty Ltd, Drawing No. HPP-CS001, dated 12 April 2001:	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Letter DPE 2016		**C**
	(g) Additional information. Dated 11 May 2001, regarding noise emissions limits for the proposed development, supplied to the Department by Highland Pine Products on 15 May 2001;	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Letter DPE 2016	Refer to Specific Recommendations in this Protocol	**NC**
	(h) relevant prescribed conditions in clause 98 of the Environmental Planning & Assessment Regulation 2000; and (98 Compliance with Building Code of Australia and insurance requirements under the Home Building Act 1989)	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Addressed in previous audit (EnviroRisk, 2015)		NA
	(i) the conditions specified in Schedule 2 of this consent.		Various, Site interview, Observations	Refer to Specific Recommendations in this Protocol	**NC**
Licensing Variation	**1.3 Prior to commencement of any construction activities, the Applicant must apply to the EPA for a license variation for the development**	Environmental Protection Licence 11229, 17 Feb 2021	Pre- 2010 requirement. However, reviewed copy of licence, see comments further within protocol.		**C**
Surrender of DA 27/95	**1.4 Within twelve months following the conclusion of commissioning of the development, the Applicant must submit an application to the Minister to surrender Development Consent DA 27/95 in accordance with Section 80A(1)(b) of the EP&A Act, in so far as that consent applies to the land covered by this consent**	Refer DPE Letter 2018	Addressed in previous audit (EnviroRisk, 2015)		NA
Restriction to Operations	**1.5 Timber production shall be limited to a total of 265,980 m3 per year**	AEMR 2019 and 2020	Timber production confirmed under 265,980m3/year with 215,620 m3 and 231,6556m3 in 2019 and 2020 respectively.		**C**
	Structural Adequacy (note items 1.6 - 1.11 Construction related and no longer relevant)	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Previously confirmed as in compliance by DPE		**C**

	1.10 Before the commencement of construction work on any aspect of the development, the Applicant must obtain a construction certificate for this aspect of the development from the Principal Certifying Authority.	Written communication DPE, 17/8/16. (Ref DA 403-11-00) Sighted Letter from HPP to DPE dated 08 Oct 2019 Sighted email communication with DPE dated 15 Oct 2019	Construction completed in early 2000's. Following the previous Audit Recommendations (EnviroRisk 2015 and EnviroRisk 2019), HPP further liaised with DPE in late 2019 / early 2020 regarding the modification of consent conditions (sighted letter from HPP to DPE dated 8 oct 2019 and email dated 15 Oct 2019 to and from DPE). Reportedly, these discussions went backwards and forwards and due to the challenges associated with COVID 19 nothing further has been progressed. The site advises that there are future potential changes at the site that will require a planning permit and so will review modification to the existing consent conditions as part of that application process.	Rec DC: 21-1. HPP pursue modification of existing planning consents as part of a planning permit application for future proposed works at the facility	**NC**
	1.11 Before commencement of operations permitted by this consent, the Applicant must obtain an occupation certificate for the buildings and structures which comprise the development, from the Principal Certifying Authority.	As above	As above	As above	**NC**
Compliance Reporting	**2.1 Throughout the life of the development, the Applicant must secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.**	Observation, Interviews, Documentation review, Data assessment.	The requirement is broad. Non-compliances have been identified and as such this condition is also non-compliant.	Refer to Recommendations in this Protocol	**NC**
	2.2 Construction related - No longer applicable	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Compliance Agreed by DPE		**C**
	2.3 Construction related - No longer applicable	as above	Compliance Agreed by DPE		**C**
	2.4 Prior to commencement of operations of the development, the Applicant must certify in writing, to the satisfaction of the Director-General, that it has obtained all the necessary approvals for operations, and complied with all the relevant conditions of this consent and/or any other statutory requirements for this development.	as above	Addressed in previous audit (EnviroRisk, 2015). Compliance agreed by DPE		**C**
Environmental Management Plan	**3.3 The Applicant must prepare and implement an Environmental Management Plan for all operations at the site. This plan must:**	Sighted HPP EMP - Feb 2021. Conformance with the EMP was assessed via interview, site video inspection and sighting of relevant documents.	The EMP builds on earlier versions and had been updated in 2021 to incorporate the new ownership partner and revised structure of HPP. It caters for Site 2 activities (and the other sites managed by HPP). It contains an amendment record on iterations over the years.		**C**
	(a) Describe the operations	Sighted HPP EMP - Feb 2021.	Section 1.2 of the EMP provides a brief description of the operations		**C**
	(b) Identify relevant statutory requirements that apply to the operation of the development;	Sighted HPP EMP - Feb 2021.	Section 2.3 of the EMP makes reference to the DA and EPL requirements specified. A Shared Services Agreement is also referenced in section 3.3 of the EMP for water discharge to neighbours for treatment and re-use. The References provide a list of various regulations and guidelines. However Some material is out of date.	Rec DC: 21-2 (OFI) : During the next EMP update, review the references section to ensure it specifies relevant Acts and Regulations applicable to the site. Rec DC:21-3 (OFI): Update the References list in the EMP to include: - Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018, - Protection of the Environment Operations Act 1997, - Protection of the Environment Operations (Clean Air) Regulation 2021, - Approved methods for the modelling and assessment of air pollutants in NSW 2016, - NSW EPA, Approved methods for the sampling and analysis of air pollutants in New South Wales 2006, - Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017	**C, O**
	(c) Set standards and performance measures for each of the relevant environmental issues.	Sighted HPP EMP - Feb 2021.	Section 3 of the EMP outlines standards and performance measures	Rec DC:21-4 (OFI): Update the EMP to include specific units of measurement (consistent with EPL 11229) within the Groundwater Environmental Monitoring Requirements Rec DC:21-5 (OFI): Update the EMP to include the current version of EML 11229	**C, O**
	(d) Describe what actions and measures will be implemented to mitigate the potential impacts of the development, and to ensure that the development meets these standards and performance measures;	Sighted HPP EMP - Feb 2021	Section 3 of the EMP outlines Strategic Plans that specify management tasks to ensure compliance.		**C**
	(e) Describe what measures and procedures will be implemented to:				**C**

	• **Register and respond to complaints**	Sighted HPP EMP - Feb 2021 plus PIRMP Sighted Community Complaints Register relating to HPP Sighted onsite Community complaint log book for the Oberon Timber complex	Section 2.8 of the EMP details how to respond to any complaints, issues or concerns raised by the public. The register was sighted and demonstrates no HPP related complaints have been made since the previous Audit. Also sighted the onsite Community complaint log book for the Oberon Timber complex showing this is in use	Rec DC:21-6 (OFI): Undertake annual update of the onsite Community Complaint Logbook	**C, O**
	• **Ensure the operational health and safety of workers**	Sighted HPP EMP - Feb 2021 plus PIRMP	Section 2.4 of the EMP states that the EMP will describe what measures and procedures will be implemented to ensure operational health and safety of workers. However the only reference to safety in the EMP is with regard to pursuing environmental goals in a way that acknowledges safety goals in environmental awareness training. Safety is included in the PIRMP. However there is a separate safety and health management system that addresses OHS. OHS systems were available and being implemented. OHS was not subject to a detailed audit given this audit being an environmental audit.	Rec DC:21-7 (OFI): Update the EMP to reference or link to site safety systems	**C**
	• **respond to potential emergencies, such as plant failure;**	Sighted HPP EMP - Feb 2021 plus PIRMP	Section 2.11 of the EMP provides guidance on emergency preparedness and also references the PIRMP		**C**
	(f) Describe the role, responsibilities, authority, and accountability of all the key personnel involved in the operation of the development;	Sighted HPP EMP - Feb 2021.	Environmental Management Tasks refer to an 'Environmental Manager', 'Area Leader' and 'Site Gate Security' but these positions are not mentioned in section 2.5 Responsibilities.	Rec DC:21-8 (OFI): Update the EMP to either remove references to the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' if these positions do not exist, or, if the positions do exist to define the roles and responsibilities of the 'Environmental Manager', 'Area Leader' and 'Site Gate Security' and any other roles described in the EMP.	**C, O**
	(g) Incorporate the detailed Environmental Monitoring Program (see condition 5.1 below)	Sighted HPP EMP - Feb 2021.	Section 3 of the EMP outlines the Monitoring program and is considered comprehensive to assess environmental impact. One additional groundwater bore is considered required.	*Refer recommendation in EPL protocol.*	**C, O**
	(h) Include the following				
	• **management strategies for the control of dust, noise and stormwater;**	Sighted HPP EMP - Feb 2021.	Section 3 of the EMP outlines strategies for the control of dust, noise and stormwater		**C**
	• **Landscape Management Plan (see 4.19 – 4.21 below)**	Sighted HPP EMP - Feb 2021.	Section 3.8 of the EMP provides a brief comment on landscaping and is not considered to comply with the Landscape Plan expected under Landscaping Approval. (refer 4.19 below)	See recommendations below	**NC**
	• **Waste Management Plan (see 4.11 below)**	Sighted HPP EMP - Feb 2021.	Section 3.10 of the EMP outlines Strategies for Waste and Material Management. A separate Waste Management Plan has also been developed.		**C**
	3.4 The Applicant must ensure that a copy of EMP is submitted to council and is publicly available.	Sighted HPP EMP - Feb 2021.	AN EMP has been developed and is publicly available on the HPP website (checked and downloaded), however it is not clear if this has been issued to Oberon council	Rec DC:21-9: Issue a copy of the current EMP to Oberon Council	**NC**
	3.5 The Applicant must review and update the EMP regularly, or as directed by Director-General.	Sighted HPP EMP - Feb 2021.	The EMP includes an amendment register. There are inconsistencies within the EMP explaining the EMP review process. The Header of the EMP states that the EMP will be reviewed on an annual basis. Section 2.13 states that the EMP will be reviewed as required when operations at the site are materially altered.	Rec DC:21-10: Update the EMP to provide a consistent requirement for the frequency of review of the EMP	**Nc**
	3.6 The EMP must be approved by Director-General prior to commissioning of the development.		Approved in early 2000's. Condition no longer relevant.		NA
4 Environmental Standards					
Noise	**4.1 Noise emissions from the operation of the proposed development must not exceed the levels for the time periods specified in the following table when measured at any residence not owned by or under the control of the Applicant.**	Sighted HPP Environmental Noise Audit - April/May 2020			see below
	The noise limits (e.g. 41 dB(A) night period) in the table:	Sighted HPP Environmental Noise Audit - April/May 2020	Estimated HPP contribution (L_{Aeq}) to measured ambient noise is estimated to be below EPL11229 measurement criteria. However estimated HPP contribution (L_{A10}) to measured ambient noise is estimated to be above the DA-403-11-00 specified measurement criteria of 41 $L_{A10\ 15min}$ dB(A) for the night period at locations 26 Cunynghame Street West and 12 Herborn Street.	Rec DC:21-11 (NC): As part of recommendation DC21-1 above seek to have specified noise measurement criteria in the DA aligned with criteria specified in EPL 11229. If this cannot be achieved, develop and implement noise attenuation strategies to bring measured noise from the HPP facility within the DA-403-11-00 specified measurement criteria of '41 LA10 15min dB for the night period.	**NC**

	• **Apply to noise emissions under prevailing wind condition of up to 3m/s from the south west, but;**	as above	Assessments have considered prevailing wind speeds		see above
	• **May be exceeded at a residence where the applicant can demonstrate to the satisfaction of the Director-General that a negotiated agreement between the Applicant and the owner of the residence has been reached with regard to noise at the affected residence.**		No agreements are reported to be in place		NA
	4.2 Noise is to be measured at the nearest or most affected residences to determine compliance with Condition 4.1	as above	Noise was measured at locations in accordance with the requirements of EPL 11229 and DA 403-11-00		**C**
	4.3 The noise emissions identified in Condition 4.1 apply for the prevailing meteorological conditions (winds up to 3m/s), except under conditions of temperature inversions. Noise impacts that may be enhanced by temperature inversions must be addressed by:	as above			**C**
	• **Documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and**	Sighted Community Complaints Register relating to HPP, AEMR 2019, 2020	There have been no community complaint during the audit period.		**C**
	• **Where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under temperature inversion conditions should be developed and implemented.**	Noise reduction plan, Observations	No noise complaints received during the audit period. Photographic evidence demonstrates exits along the Drymill are closed and the Drymill entry is closed providing Nosie control. However adjacent to the Drymill re-entry is a sticker conveyor where the rubber curtain has been damaged allowing for noise to escape the building.	Rec DC:21-12 (OFI): Replace the damaged rubber curtain at the Drymill re-entry sticker conveyor to contribute to noise attenuation from this area	**C, O**
Dust	**4.4 All activities in or on the premises must be carried out in a manner that will minimise the generation or emission of the wind-blown or traffic generated dust from the premises using the measures proposed in the SEE.**	Photographic evidence	Yard dust and wood dust/ shavings were largely controlled with limited risk of being blown beyond site boundaries. The Bark Bin area shows that housekeeping practices are keeping the are in a neat and tidy condition. The Boiler 2 fuel shed has the fuel bin door closed and resulting in no residual woodchip on the roof. Housekeeping in this area has shown considerable improvement	Rec DC: 21-13 (OFI) Ensure that all boiler fuel product is stored inside the bin to reduce impact into adjacent stormwater system.	**C**
	4.5 All areas must be maintained in a manner that will minimise the generation or emissions of wind-blown or traffic generated dust from the premises using the measures proposed in the SEE.	Photographic evidence	Roads appeared clean.		**C**
	4.6 Trucks carrying residues from the site must be covered at all times, except during loading and unloading. Residues are taken to include sawdust, shavings, chips and bark.	Photographic evidence	Video footage of trucks at site entrance show truck was tarped before leaving the site. Photographic evidence revealed cameras surveillance of trucks is undertaken. EMP clearly outlines this requirement. Note Gates 2 and 3 do not have signage advising trucks transporting residues to be tarped prior to leaving the site.	Rec DC:21-14 (OFI): Place additional signage at Gates 2 and 3 advising that all trucks transporting residues are to be tarped before leaving the site.	**C, O**
Pollution of Waters	**4.7 Except as may be expressly provided by a license under the Protection of the Environment Operations Act 1997 in relation to the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with in and in connection with the carrying out of the development.**	Sighted Shared Service Agreement 3459-8588-4932v21 (Aug 27, 2018), Photographic evidence	Water drains to collection pond off log yard or into channel across roof and roadways. All is diverted to Borg under a SSA for treatment and re-use.		**C**
	4.8 Prior to construction, the Applicant must prepare an Erosion and Sediment Control Plan which describes what measures will be used to minimise soil erosion and the discharge of sediment and other pollutants to nearby land, water or drains during construction activity. This plan must be prepared in accordance with the requirements for such plans in the Department of Housing's publication "Managing Urban Stormwater: Council Handbook"	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	No Longer relevant. Confirmed by DPE that compliance is achieved.		NA
	4.9 Prior to operation, the Applicant must prepare a detailed Stormwater Management Plan for the site, which has been prepared in consultation with Council, to mitigate the impacts of stormwater runoff from the development and its operations.	Sighted HPP Stormwater Management Plan 2021 - 2023 (dated April 2021); Observations; Interviews.	A SWMP has been prepared but it is nor clear if consultation with Oberon Council has occurred	Rec DC: 21-15 Seek consultation from the Oberon Council on the current version of the Stormwater Management Plan	**NC**
Waste Management	**4.10 The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the protection of the Environment Operations Act 1997.**	Observation, Interviews, Documentation review, Data assessment.	No waste is received on the site. Fuel, in the form of wood material, is infrequently purchased for use in the boiler, generally late winter.		**C**
	4.11 The Applicant must prepare and implement a Waste Management Plan for the development in consultation with Council. This plan must describe in detail the waste management system, including:	Sighted Waste Management Plan HPP Albion Street, Oberon, NSW 2021	Sighted email from Oberon Council (dated 22 April 2020) confirming that Council considered the WMP to be extensive and suitable		**C**

	(a) the types and quantities of the waste which will be generated at the site; and	as above	Section 1 of the WMP identified the manufacturing process and types of waste that are generated and how they are managed under the waste hierarchy. Section 2 of the WMP identifies estimated volumes of each waste under a waste inventory and description.		**C**
	(b) how waste will be stored on-site, transported, and disposed of off-site.	as above	Section 2 of the WMP (waste inventory and description) describes how each identified waste stream will be managed, stored, transported and disposed off-site.		**C**
	4.12 The WMP prepared in accordance with Condition 4.11 must have been approved by the Director-General prior to commissioning of the development.	Sighted email to DPE (Dated 19 November 2019) Sighted email from DPE to HPP (dated 2 December 2019) Sighted email from HPP to DPE (dated 13 January 2020) Sighted email from DPE to HPP (dated 25 May 2020)	Submission of the WMP to the DPE was made on the 19 November 2019. DPE responded via email with comments on the WMP on the 2 December 2019 to which HPP provided additional information via email on 13 January 2020. Sighted an email from DPE (dated 25 May 2020) confirming that from their perspective the comments made by Oberon Council regarding the WMP satisfied the consultation requirement. However, it is still not clear if DPE have approved the WMP.	Rec DC: 21-16 Seek DPE approval of the current version of the Waste Management Plan.	**NC**
	4.13 After reviewing the Waste Management Plan, the Director-General may require the Applicant to address certain matters identified in the plan. The Applicant must comply with any reasonable requirements of the Director-General.	As above	As above. DPE reviewed the WMP and provided an email with comments on the WMP on the 2 December 2019 to which HPP provided additional information via email on 13 January 2020. However, it is still not clear if DPE have approved the WMP.	As above.	**NC**
Parking	**4.14 The Applicant must design and construct a new parking area for employees and visitors providing a total of no fewer than 150 parking spaces on the site.**	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	The car park had plenty of free spaces yet was not sized to provide 150 spaces with about 120 available.	See recommendation DC21-1.	**NC**
	4.15 The carpark design must conform to AS 2890.1-1993.	Interview.	Reportedly Council have had no concerns over past decade with car park.		**C**
	4.16 Visitor and service vehicle parking spaces must be clearly signposted and designated.	Interview.	Reportedly Council have had no concerns over past decade with car park.		**C**
	4.17 Traffic calming devices must be installed in the car park to the satisfaction of Council.	Interview.	Reportedly Council have had no concerns over past decade with car park.		**C**
Lighting	**4.18 The Applicant must ensure that any external lighting associated with the development is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary.**	Observation during night period.	The bund wall and the tree screens to the south are considered to protect against light nuisance. There have been no complaints regarding lighting during the audit period.		**C**
Landscape Management	**4.19 The Applicant must prepare and implement a detailed Landscape Management Plan for the development. This plan must.**	Sighted HPP Landscape Management Plan 2021	A detailed Landscape Management Plan has been developed.		**C**
	(a) describe in detail existing and future landform of the site.	As above	Describes in detail the existing and ongoing landform of the site		**C**
	(b) describe in detail how the site will be landscaped, including the location and species of all planting; and	As above	Describes in detail the landscaping plan with maintenance schedules, frequency and responsibilities assigned.		**C**
	(c) explain how this landscaping will be managed and maintained over time.	as above	as above		**C**
	4.20 The Landscape Management Plan prepared in accordance with Condition 4.19 must have been approved by the Director-General and implemented prior to the commencement of operations.	Sighted email to DPE (Dated 19 November 2019) Sighted email from DPE to HPP (dated 2 December 2019) Sighted email from HPP to DPE (dated 13 January 2020) Sighted email from DPE to HPP (dated 25 May 2020)	Submission of the LMP to the DPE was made on the 19 November 2019. DPE responded via email with comments on the LMP on the 2 December 2019 to which HPP provided additional information via email on 13 January 2020. However, it is still not clear if DPE have approved the LMP.	Rec DC: 21-17 Seek DPE approval of the current version of the Landscape Management Plan.	**NC**
	4.21 After reviewing the Landscape Management Plan. The Director-General may require the Applicant to address certain matters identified in the plan. The Applicant must comply with any reasonable requirements of the Director-General.	As above	As above. DPE reviewed the LMP and provided an email with comments on the LMP on the 2 December 2019 to which HPP provided additional information via email on 13 January 2020. However, it is still not clear if DPE have approved the WMP.	As above.	**NC**
5. Environmental Monitoring	**5.1 The Applicant must prepare and implement a detailed Environmental Monitoring Program for the development in consultation with the EPA. The program must:**	Environmental Protection Licence 11229, 17 Feb 2021	Monitoring plan prepared in consultation with EPA who have issued via their Environmental Protection Licence.		**C**
	(a) Identify what environmental issues will be monitored;	as above	see above		**C**

	(b) set standards and performance measures for these environmental issues;	as above	see above		C
	(c) describe in detail how these issues will be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of this monitoring will be recorded and reported to the Director-General and other relevant authorities;	Sighted HPP EMP - Feb 2021.	The monitoring has been summarised into the EMP		C
	(d) indicate what actions will be taken, or procedures followed, if any non-compliance is detected; and if non-conformance detected	Sighted PIRMP - dated 14/05/2020, Interview, Interrogation of Risk manager. Sighted PIRMP Notification Assessment (29/11/2020)	The PIRMP is considered to fulfil this requirement. Sampling of the PIRMP in the Risk Manager System found the process robust. Reviewed a PIRMP Notification Assessment (dated 29/11/2020) for a fire incident demonstrating action taken and authorities notified.	Rec DC:21-18 (OFI): Include in monitoring results tables in the AEMR's the criteria against which monitoring parameters are assessed (i.e. 250 mg/m3 for TSP and 2,500 mg/m3 for NOx).	C, O
	(e) include Noise Compliance Monitoring Program (see 5.1) to determine the level of compliance with the noise criteria in Condition 4.1.	Sighted HPP EMP - Feb 2021			C
	5.2 The data obtained from the Environmental Monitoring Program shall be made available for, and where appropriate incorporated into, the broader monitoring program for the Oberon Industrial Area.	Sighted 2019 and 2020 AEMR	The complex is now separate companies. This provision may be difficult to comply with into the future.	Refer DC 21-1.	C, O
Monitoring records	**5.3 The results of any monitoring required to be conducted by this consent, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with the load calculations protocol, must be recorded and retained on accordance with EPA requirements, at A2.1.1 and A2.1.2 of Attachment A to this consent.**	AEMR 2019 and 2020, EPL Annual Return 2018/19, 2019/20, 2020/21.	Monitoring records are retained. A summary of which is provided in the AEMR and EPA Licence Annual returns. Load calculations not applicable.		C
Noise Compliance Monitoring Program	**5.4 The Applicant must conduct noise monitoring during the construction phase, at the site boundaries and the nearest potentially affected residential areas. Monitoring must be conducted in accordance with EPA guidelines.**				NA
	5.5 The Applicant must conduct noise monitoring during the operation phase to assess compliance with noise limits set out in Condition 4.1. The frequency of monitoring must be as follows:	Sighted HPP Environmental Noise Audit - April/May 2020	Reports commissioned and conducted at nearest residences in N, W, S directions. Refer to additional comments in 4.1 above		C
	(a) within 3 months of the commencement of commissioning of the development; and		NA		NA
	(b) annually thereafter.	Sighted HPP Environmental Noise Audits - May 2019 and April/May 2020	Noise monitoring is undertaken annually		C
	5.6 The Environmental Monitoring Program prepared in accordance with Condition 5.1 must have been approved by the Director-General before the development may be commissioned.	Written communication DPE, 17/8/16. (Ref DA 403-11-00)	Confirmed by DPE to be in compliance		C
	5.7 After reviewing the Environmental Monitoring Program, the Director-General may require the Applicant to address certain matters identified in the program. The Applicant must comply with any reasonable requirements of the Director-General.				NA
Environmental Reporting	**6.1 Twelve months after commissioning of the development, and annually thereafter for the duration of the development, the Applicant must submit an Annual Environmental Report to the Director-General and the Council. This report must:**	Sighted AEMR 2019 and 2020	Sighted letter (dated 19/04/2021) from DPE confirming receival of AEMR		C
	(a) identify all standards, performance measures and statutory requirements the development is required to comply with;.	As above	Section 12 of the 2019 and 2020 AEMR identifies and reports on compliance against the standards, performance measures and statutory requirements the development is required to comply with.	Refer recommendations DC21-4 & 21-5.	C, O
	(b) review environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;	As above	As above		C
	(c) identify all the occasions during the previous year when these standards, performance measures, and statutory requirements have not been complied with;	As above	Non-compliances are identified in the AEMRs		C
	(d) include a summary of any complaints made about the development, and indicate what actions were taken (or are being taken) to address these complaints;	As above	Section 11 of the AEMR provides a summary of any complaints. No complaints over the 2019 and 2020 reporting periods.		C
	(e) include the detailed reporting from the Environmental Monitoring Program (see Conditions 5.1-5.6), and identify any trends in the monitoring over the life of the project;	As above	Details provided of monitoring results. Improvements in annual deposited dust were noted		C

	(f) where non-compliance is occurring, describe what actions are or will be taken to ensure compliance, who will be responsible for carrying out these actions, and when these actions will be implemented;	As above	Non-compliances are identified in the AEMRs and are associated with the previous audit recommendations (status updates have been provided), and which have been reviewed as part of this independent environmental audit.	**C**
	(g) incorporate the requirements of the EPA with regard to the annual Return required by any license under the Protection of the Environment Operation Act 1997. The requirements of the EPA with regard to the Annual Return are at A3 of attachment A to this consent.		HPP have reviewed and will align in accordance with new planning permit conditions when that process happens	**C**
	6.2 After reviewing the Annual Environmental Management Report, the Director-General may require the Applicant to address certain matters identified in the Report. The Applicant must comply with any reasonable requirements of the Director General.		NA	NA
Independent Environmental Audit	**6.3 Within 12 months of conclusion of commissioning of the development, and every three years thereafter, unless the Director-General otherwise directs, the Applicant must commission and pay the full cost of an Independent Environmental Audit. The Independent Environmental Audit must:**		Independent Audit currently being undertaken by EnviroRisk Management Pty Ltd	**C**
	(a) Be conducted by a suitably qualified, experienced, and independent person who's appointment has been endorsed by the Director-General;		IEA now being undertaken. Auditor endorsed by DPE prior to starting audit.	**C**
	(b) be consistent with ISO 14010- Guidelines and General Principals for Environmental Auditing, and ISO 14011-Procedures for Environmental Auditing, or updated versions of these guidelines/manuals;		Process consistent with AS/NZS guidelines.	**C**
	(c) Assess the environmental performance of the development, and its effects on the surrounding environment;		Audit reviewed operational risk and impact on surrounds	**C**
	(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Compliance has been evaluated.	**C**
	(e) review the adequacy of the Applicant's Environmental Management Plan, and Environmental Monitoring Program; and if necessary,		Reviewed noise monitoring and groundwater monitoring and made comments and recommendations above.	**C**
	(f) recommend measures or actions to improve the environmental performance of the plant, and/or the environmental management and monitoring systems.		Recommendations have been made	**C**
	6.4 Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General. After reviewing the report, the Director-General may require the Applicant to address certain matters identified in the Report. The Applicant must comply with any reasonable requirements of the Director-General.			NA
Additional items supporting the DA Protocol	***DA References a number of supporting reports.***			
	SEE 2.2.2 Site Environmental Coordinator will continue to work with the joint venture		The co-ordinator has been replaced by an environmental advisor at Borg and HPPs EHSR advisor aided by the Environmental Consultant.	NA
	SEE 6.2.1 Stated it was planned to move a Boiler or install a new Boiler on the CHH site to increase output capacity and this will meet 100 mg/m3.	Inspection	Boiler installed yet not operational	NA
	During Stage 2 a Gas Fired Boiler was installed		Gas fired boiler now has been de-commissioned.	NA
	SEE 3.4.8 Stated Office space for the combined staff will be provided by installing a portable office building at the south west corner of the CHH site on land		Office space now provided on Site 1.	NA

LEGEND	***Compliance is rated as follows (reference NSW DPE, IAPAR, 2018):***
C	Compliant - Verified to comply with what is stated;
Nc	Non-compliant - minor actual or potential issue having limited impact; systems implementation or documentation type issue;
NC	Non-Compliant - significant deviation from what is specified with potential or actual significant impact;
O	Observation - opportunity for improving the management system and/or operational controls exists;
NA	Not Applicable – Not Auditable or not in scope (see comments for reason why)
NT	Not Triggered - Condition has an activation or timing trigger or is not able to be verified within the time of the audit

EPA LICENCE N0. 11229 (ISSUED 13 AUGUST 2001)

AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD, OBERON

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
A1.1	Wood Milling >200,000 m3 per annum; timber preservation >30,000 m3/annum	AEMR 2019 and 2020	Timber production confirmed under 265,980m3/year with 215,620 m3 and 231,655m3 in 2019 and 2020 respectively.		C
A3.2	Bifenthrin Part 1 & Part 2 Plant design ASNSZ 2843.1:2000	Observations, Interviews	An assessment was made against ASNZS 2843.1:2000 Plant Design. It was confirmed most elements could be substantiated. Those that could not and are in consideration of improvement have been captured in the recommendations and illustrated in the Pictorial Summary.	Captured in recommendation Section O4.1.	NC
P1.1	Location of monitoring & discharge points 1, 7 and 8 relating to air/dust deposit (as per Table)	Sighted HPP EMP - Feb 2021	Monitoring of discharge points 1, 7 and 8 occurs and locations are shown on a plan in the EMP		C, O
P1.2	Location of monitoring points 5 and 6 relating to groundwater (as per Table)	Sighted HPP EMP - Feb 2021	Monitoring of discharge points 5 and 6 occurs and locations are shown on a plan in the EMP		C, O
L1 POLLUTION OF WATERS: L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	EMP, SWMP, WMP PIRMP, Interviews, Observation	The SWMP outlines controls over surface water pollution. All waters are contained within the system that feeds the Borg containment and re-use facility. Monitoring is conducted by Borg on water quality under the Shared Services Agreement. The log yard is contained within the pond to its north-east. This pond is aerated (sighted via photographic evidence) and water pumped to the stormwater transfer system. It is reportedly designed to contain a large rainfall event with pumps sized accordingly for transfer. In the unlikely event of overflow the catchment flows into the Borg stormwater pond which provided further control. Given these conditions would accompany a very large rain event, the risk of pollution from log yard sediment and organics is considered low should this ever occur.		C
L1.2	Water Mgt System: Discharge to adjoining premises 3035 for treatment	SWMP, Photographic evidence	Confirmed stormwater and process water plans and lines that could be observed from kilns (separate line) and boiler blowdown are directed to Borg. Photographic evidence of the area down from Borg to Kings Stockyard Creek identified no unusual flows however, large volume of sawdust have been captured in gross pollutant traps along all channel reaches. HPP have been unable to engage external vac trucks in recent months due to Covid lockdowns in metro and regional NSW). Reportedly, there is no available resource with suitable equipment in western NSW.	Rec EPL:21-1 Engage a contractor as soon as reasonably practicable to clean out the gross pollutant traps	C, O
L1.3	Water Mgt System: Notify EPA of any changes to the integrated water management system provisions of the Shared Services agreement that exists between the licensee and the holder of environment protection licence 3035	Interviews	No change in recent times has reportedly occurred. Any alterations would form part of Annual return.		C
L2 CONCENTRATION LIMITS: L2.1	For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Data Review, Interview Sighted Ektimo reports: R007409 (2019); R0049276 (2020).	Annual stack test monitoring undertaken by Ektimo. All concentrations were below concentration limits specified for the pollutants (i.e. TSP and NOx) listed in EPL11229.		C
L2 LOAD LIMITS: L2.2	Air Concentration Limits as per Table: TSP = 250mg/m3; NOx = 2500 mg/m3	As above	As above		C
L3 WASTE L3.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence.	Interviews, AEMR 2019 and 2020	Reportedly there is no waste received at the site. The diversion of treated wood from landfill for reuse at Borg panels under a Resource Recovery Order (RRO) is to be commended. Waste wood is received periodically to add to the boiler fuel. External fuel is purchased from a single supplier. Sighted letter from HPP to fuel supplier (No date) and from fuel supplier (Australian Native Landscapes dated 7 June 2021) that the fuel material supplied by Australian Native Landscapes meets the HPP standard fuel criteria		C
L4 NOISE LIMITS: L4.1	Noise from the premises must not exceed: a) 55 dB(A) LAeq(15 minute) during the day (7am to 6pm); and b) 50 dB(A) LAeq(15 minute) during the evening (6pm to 10pm); and c) at all other times 50 dB(A) LAeq (15 minute), except as expressly provided by this licence. Where LAeq means the equivalent continuous noise level – the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.	Interviews, Sighted HPP Environmental Noise Audits - May 2019 and April/May 2020	Estimated HPP contribution (L_{Aeq}) to measured ambient noise is estimated to be below EPL11229 measurement criteria.		C
L4.2	To determine compliance with condition L4.1 noise must be measured at, or computed for, at "Oorong" or an other noise sensitive location (such as a residence/school) along Herbourne or West Cunynghame Street, Oberon. A modifying factor correction must be applied for tonal, impulsive or intermittent noise in accordance with the "Environmental Noise Management - NSW Industrial Noise Policy (January 2000)".	see above	Noise measurements at Oorong are in compliance with EPL even with a modifying factor of 5 dbA applied to evening and nigh time periods		C
L4.3	The noise emission limits identified in this licence apply under all meteorological conditions except: a) during rain and wind speeds (at 10m height) greater than 3m/s; and b) under "non-significant weather conditions".	see above	Most recent assessments considered to provide detail that this was the case. The 2020 assessment conducted noise monitoring for the night period at a different time to allow for appropriate wind speeds.		C
L4.4	The noise limits in the above table do not apply where the licensee and an affected resident have reached a negotiated agreement in regard to noise.	Interview	No agreements are in place.		C

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
O1 OPERATING CONDITIONS: Competent Manner O1.1	**Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.**	Observations, EMP	A system has been developed for management and control of H2 waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber is now captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill.		**C**
O2: Maintenance of plant and equipment O2.1	**All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.**	Interviews, Observations, Photographic evidence, Opacity read-outs, Monitoring data	Correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure. Sighted an email (dated 21 April 2021) from Ektimo wit correlation calculations formula. Sighted operators Screen. Reportedly an SOP has been developed to provide guidance to operators in how to manage upset conditions The site inspection (via photographic evidence) identified doors were closed on the dry mill southern boundary and at the dry mill entry thereby contributing to effective noise attenuation.		**C**
O3.1 Dust	**All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.**	Photographic evidence, Interviews, Dust Deposition - Ektimo monitoring 2021 ,	Photographic evidence suggest minimal dust was noted outside the site on the roads. The fuel shed roof was clean of sawdust, no complaints have been lodged.		**C**
O3.2	**Trucks entering and leaving the premises that are carrying loads of material likely to blow off must be covered at all times, except during loading and unloading.**	Photographic evidence- security, Closed Circuit TV monitors, Observations, Complaint register	Minimal dust was noted outside the site on the roads. Photographic evidence of security confirmed a check made on the CCTV screens with trucks being tarped		**C**
O4.1 Process and management	**The bifenthrin treatment facility must be operated in accordance with the requirements of Australian/New Zealand Standard, Timber preservation plant safety code, Part 1: Plant design – AS/NZS 2843.1:2000. and Australian/New Zealand Standard, Timber preservation plant safety code, Part 2: Plant operation – AS/NZS 2843.2:2000, except as expressly provided by a condition of this licence**	ANZS 2843:1 & 2. Interviews, Photographic evidence, MEX.	An assessment was made against ASNZS 2843.1:2000 Plant Design. It was confirmed most elements of the Standard could be substantiated. Those that could not, and are in consideration of improvement have been captured in the recommendations and illustrated in the Pictorial Summary. These include:	Rec EPL:21-2: Improve plant design compliance with the ANZS 2843.1 Standard including: a) Part 1 Section 2.4 Water Bodies: Install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps.	**NC**
	SECTION 5 MONITORING AND RECORDING CONDITIONS				
	M1 MONITORING RECORDS				
M1 MONITORING RECORDS: M1.1	**The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.**	see below	see below		**C**
M1 MONITORING RECORDS: M1.2	**All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.**	Records, Monitoring reports, Interviews	Monitoring is conducted and records retained dating back 4 years as checked for AEMR (dated 2017/18).		**C**
M1 MONITORING RECORDS: M1.3	**The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.**	Records, Observations ALS ES1940307 Dec 2019 ALS ES 2023293 Jul 2020 ALS ES2044287 Dec 2020 ALS ES2124500 Jun 2021	Confirmed that ALS contained the required information in their reports.		**C**
TESTING METHODS: Load Limits	***Note: Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.***		Load limits are not applicable as they are not specified in this Licence.		**NA**
	M2 REQUIREMENT TO MONITOR CONCENTRATION OF POLLUTANTS DISCHARGED				
M2.1	**For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns**	see below	see below		
M2.2	**Air Monitoring Requirements (Tables provided for Point 1) for Pollutants: Point 1 - Yearly and Continuous for Opacity**	Data Review, Interview Sighted Ektimo reports: R007409 (2019); R0049276 (2020)	Annual stack test monitoring undertaken by Ektimo. All concentrations were below concentration limits specified for the pollutants (i.e. TSP and NOx) listed in EPL11229.		**C**
M2.3	**Water and/ or Land Monitoring requirements (Tables provided for Point 5 & 6) for Pollutants: Every 6 months - Grab samples**	Records, Observations ALS ES1940307 Dec 2019 ALS ES 2023293 Jul 2020 ALS ES2044287 Dec 2020 ALS ES2124500 Jun 2021	Groundwater was monitored as Licence required with results suggesting an acidic groundwater at pH=5.13 onsite and approx. 5.7 upgradient (background) and nitrate higher at approx 9 mg/L on site compared to upgradient (background of approx 1.3 mg/L avg).		**C**
	M3 Testing Methods - Concentration limits				**C**

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
M3.1	**Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:** **a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or** **b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or** **c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.**	Data Review, Interview Sighted Ektimo reports: R007409 (2019); R0049276 (2020).	Sampling of monitoring techniques and analysis adopted were confirmed to conform with 'Approved Methods'		**C**
	Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW"	NA			
M3.2	**Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted**	Records, Observations ALS ES1940307 Dec 2019 ALS ES 2023293 Jul 2020 ALS ES2044287 Dec 2020	Groundwater monitoring is conducted in accordance with EMP using laboratories with NATA certification for analytes under investigation.		**C**
	M5 RECODING OF POLLUTION COMPLAINTS				
M4 POLLUTION COMPLAINTS: M4.1	**The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.**	EMP, Security Complaints register, Community Complaints Number dial check. Records, Sighted Community Complaints Register book at Gatehouse	No complaints have been lodged directly with HPP during the audit period The complaints number is listed at the front sign at Gate 3.		**C**
M4 POLLUTION COMPLAINTS: M4.2	**The record must include details of the following:** **a) the date and time of the complaint;** **b) the method by which the complaint was made;** **c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;** **d) the nature of the complaint;** **e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and** **f) if no action was taken by the licensee, the reasons why no action was taken.**	As above	as above		**C**
M4 POLLUTION COMPLAINTS: M4.3	**The record of a complaint must be kept for at least 4 years after the complaint was made.**	Risk Manager, Complaints Register at Gatehouse.	Monitoring is conducted and records retained dating back 4 years as checked		**C**
M4 POLLUTION COMPLAINTS: M5.4	**The record must be produced to any authorised officer of the EPA who asks to see them.**	NA			**NA**
M5 TELEPHONE COMPLAINTS LINE: M5.1	**The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.**	Complaints line test			**C**
M5 TELEPHONE COMPLAINTS LINE: M5.2	**The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.**	Sign at front gate 3			**C**
M5 TELEPHONE COMPLAINTS LINE: M5.3	**The preceding two conditions do not apply until 3 months after the date of the issue of this licence.**	NA			**NA**
M6 OTHER MONITORING: M6.1	**Noise monitoring to determine compliance with condition L4 must be carried out at least once annually during the day, evening, and night time hours specified by condition L4.1 at the locations specified under condition L4.2. The 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 Industrial Noise Policy.**	Sighted HPP Environmental Noise Audits - May 2019 and April/May 2020	Noise monitoring is undertaken annually.		**C**
	6 REPORTING CONDITIONS				**C**
R1 ANNUAL RETURN DOCS R1.1	**The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:** **1. a Statement of Compliance,** **2. a Monitoring and Complaints Summary,** **3. a Statement of Compliance - Licence Conditions,** **4. a Statement of Compliance - Load based Fee,** **5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,** **6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, and** **7. a Statement of Compliance - Environmental Management Systems and Practices.** **At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.**	Sighted 2017/2018 Annual Return Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return	An Annual Return had been made in accordance with Licence Condition R1.1.		**C**
R1 ANNUAL RETURN DOCS R1.2	**An Annual Return must be prepared in respect of each reporting period, except as provided below.**	Sighted 2017/2018 Annual Return Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return	An annual return has been completed during each reporting period		**C**

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
R1 ANNUAL RETURN DOCS R1.3 R1.4 (not applicable)	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	As above	As above		C
R1 ANNUAL RETURN DOCS R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Sighted 2017/2018 Annual Return Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return	Sighted Screenshot of EPA portal showing submission of annual returns over the audit period.		C
R1 ANNUAL RETURN DOCS R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Sighted 2017/2018 Annual Return Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return	Checked Annual return for 2017/2018 as sample		C
R1 ANNUAL RETURN DOCS R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return	All the annual returns sighted were signed by the company directors		C
R2 NOTIFICATION OF ENV HARM R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Sighted 2018/2019 Annual Return Sighted 2019/2020 Annual Return Sighted 2020/2021 Annual Return, Incident records	Reportedly there have been no complaints or notifications during the audit period as confirmed in the Annual returns		C
R2 NOTIFICATION OF ENV HARM R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.				C
R3 Written Report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	NA			NA
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request	No request over audit period			NA
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.				NA
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	NA			NA
	7 GENERAL CONDITIONS				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Sighted EPL 11229	Electronic Copy presented. The EPL can also be accessed via the Highland Pine Products Website		C
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NA			NA
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	EPL 11229, Interviews	Hard copy available and may be accessed on web		C
8 Pollution Studies and Reduction Programs					
U1 Long Term Noise Reduction - Implement mid term options					

APPROVAL ID	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS	COMPLIANCE* STATUS
U1.1 - IMPLEMENT LONG TERM OPTIONS	**The licensee must by 30 November 2023 report on completion of the long term noise attenuation actions (1-9 years) of Table 1. The report must include, but not necessarily limited to: • details of noise reduction works undertaken as per Table 1: HPP Noise Assessment. Short term and long term options for attenuation by location (Table 1. 30Jun13), or any subsequent revision from mid-term reporting. • details of noise reduction(s) achieved from various sources (locations) within the premises. • details of noise monitored outside the premises in accordance with monitoring at identified licence noise monitoring locations. • any changes proposed to options of attenuation to ensure noise emissions from premises can comply with 45 dB(A) LAeq (15 minute) noise limit by 30 December 2023. By 30 December 2023, the licence must achieve a 5 dB(A) noise reduction from the premises as after 1 January 2024 the EPA will be amending the night time noise limit of licence 11229 by 5 dB(A) to 45 dB(A) LAeq (15 minute).**	Sighted Noise Monitoring Report 2020 Final. Ref: SK011220 - 18 December 2020	A Noise Monitoring report dated 18 December 2020 was included as an appendix to the 2020 Annual Environmental Management Report. The Noise Monitoring Report addresses the requirements of condition U1.1 Estimated HPP contribution (LAeq) to measured ambient noise is estimated to be below EPL11229 measurement criteria and as such it is considered that the site meets current compliance limits and based on the short to medium term noise attenuation works undertaken to date is on track to comply with the lower 2023 limit (i.e. 45 dB(A) night-time LAeq (15 Min)).		**C**
Note:	**Consistent with developing a long term continuous noise improvement program for the Highland Pine Products (HPP) sawmill, the licensee completed and submitted to the EPA the following reports; 1) a Survey of Occupational Noise Exposures in Green and Planer Mills (report) by Knox OHS Solutions March 2013 and 2) Table 1: HPP Noise assessment. Short term and long term options for attenuation by location (Table 1 - 30 Jun 13).**				
	By the above condition, the EPA requires the licensee to implement a long term noise improvement program for the HPP sawmill to achieve a 5 dB(A) reduction in noise from the premises within 10 years to be able to meet a night time noise limit of 45 dB(A) LA eq (15 minute).	see above	see above		**C**
	As the improvement program is for 10 years and HPP Noise Assessment (Table 1) represents "potential" attenuation options at the time of preparation, the licensee is not bound to follow the short-mid-long term works identified for each location under Table 1. The licensee should however use Table 1 as a guide to the implementation and reporting of improvement works (what's been achieved at each interval and what's proposed for the next interval), towards achieving an overall 5 dB(A) noise reduction at the end of the 10 year program.	NA			**NA**
	The short-mid-long term approach to noise attenuation in Table 1 is the basis for the 3 Long term Noise Reduction PRP's (conditions U1 to U3(sic)). The licensee may however revise Table 1 at any time provided the revised Table 1 with a date of revision and revision number is provided to the EPA.	NA			**NA**
9 Special Conditions					**C**
E1	**The licensee must ensure that any ongoing maintenance, modification, upgrading or replacement of plant and equipment operated at the premises demonstrates consideration of ongoing noise reduction. To achieve this, the licensee must record all plant and equipment modifications or replacements undertaken and the noise reduction achieved as a result of the plant maintenance or replacement. The licensee must report on (provide results) all plant maintenance and replacement and associated noise reduction, as well as results of noise monitoring required under condition M6.1, in a report to be provided to the EPA within three months of the conclusion of each reporting period for the premises.**		Reportedly there has been no significant maintenance, modification, upgrading or replacement of plant and equipment operated at the premises that required ongoing noise reduction		**C**

LEGEND	***Compliance is rated as follows (reference NSW DPE, IAPAR, 2018):***
C	Compliant - Verified to comply with what is stated;
Nc	Non-compliant - minor actual or potential issue having limited impact; systems implementation or documentation type issue;
NC	Non-Compliant - significant deviation from what is specified with potential or actual significant impact;
O	Observation - opportunity for improving the management system and/or operational controls exists;
NA	Not Applicable – Not Auditable or not in scope (see comments for reason why)
NT	Not Triggered - Condition has an activation or timing trigger or is not able to be verified within the time of the audit

ENVIRONMENTAL SYSTEMS IMPROVEMENTS

AUDITEE: **HIGHLAND PINE PRODUCTS PTY LTD, OBERON**

Specific Management System (eg EMS, EMP, PIRMP, SWMP, WMP) elements warranting improvement not otherwise captured in compliance elements of the Protocol

APPROVAL ID AND REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS	RECOMMENDATIONS
Training	Sighted Training records	Sighted training records of the Site Management team in the PIRMP testing undertaken in July 2021.	
MEX Preventative Maintenance	Observations	Has been added into MEX. Sighted MEX to inspect the bunded area under the Treatment Application location	
		Has been added into MEX. Sighted MEX to inspect Roof Area around S2DM treatment spray booth vents	
Signage	Observations	There is currently no signage at both Gate 2 and 3 indicating to all trucks transporting residues or waste must be covered before leaving site. Signage for chemical need to be updated so they are clearly visible at all entry points	Refer to Recommednation DC 21-16 Rec EMS:21-1: Add HAZCHEM signs to all entry points as per the regulations so that they are clearly visible.
Fuel and Chemical Storage	Observations	Bulk oil store was observed to be bunded and clean. SDS up to date. Current SDS's available.	Rec EMS:21-2: PIRMP signage be secured to wall for easy access
		Empty drum storage is overflowing as the drum recycler has been unable to access the site due to covid restrictions (initially in Sydney Metro but more recently due to regional NSW lockdown).	Rec EMS:21-3: Arrange for drums be removed from the empty drum storage as soon as lockdown lifts. Also add signage at the drum storage area that all drums must be stored within the bund.
		Bulk ink containers were observed to be stored in small packets outside bund in Drymill	Rec EMS:21-4: Relocate bulk ink containers in the Drymill to be stored in a bunded area
		Green mill greaser lube containers were obsrved to need labelling improvements	Rec EMS:21-5: Improve the labelling on greaser lube containers in the Green mill to include pictograms and hazard classifications.
		Diesel Bulk Storage tank – Self bunded tank – minor spills/leaks are captured in the adjacent plate separator. There is no documented evidence of routine maintenance. Appears to be on an ad hoc basis when people complain about water in bund etc	Rec EMS:21-6: Add into the preventative maintenance system (MEX) the maintenance of the diesel bulk storage tank, bund pump, alarm system and plate separator
		Noted that the oil collection drum under the plate separator at the bulk diesel tank is overtopping	Rec EMS:21-7: Add into the preventative maintenance system (MEX) the regular clean out of the oil collection drum under the plate separator at the bulk diesel tank
		Wood waste suitable for recycling was observed to be deposited into the general waste bin	Rec EMS:21-8: Provide training to operators that wood waste suitable for recycling is not to be placed in the general waste bin
		Gas bottles were observed to be stored in caged area however signage needs to be updated and bottles were not all chained	Rec EMS:21-9: Update signage at gas bottle storage areas and ensure that all gas bottles are chained.
Waste	Observations	Aerosol cans were observed to have been deposited into the scrap steel bin Plastic strapping was observed to be deposited into the general waste bin	Rec EMS:21-10: Review appropriate disposal option for aerosol cans in accordance with applicable regulations and update the Waste Management Plan (WMP) to include this option. Rec EMS 21-11: Review recycling opportunities for waste plastic strapping to avoid disposal through general waste bin and update the Waste Management Plan (WMP) to include this option.
NPI Reporting	Online evidence	Sighted screenshot of NPI online portal showing that NPI reports had been submitted during the audit period. Sighted screenshot of NGERS portal showing 2019/20 NGERS Report. NPI has appropriately been completed and issued during the audit period	
EMP	Sighted HPP EMP - Feb 2021.	Sighted HPP EMP - Feb 2021. Conformance with the EMP was assessed via interview, site video inspection and sighting of relevant documents. Whilst the EMP generally aims to acheive compliance with applicable legal and other requirements (i.e the DA and EPL 11229), it is recommended that achiveing this be included as an EMP objective.	Rec EMS 21-12: Update the EMP's objectives to include achieving compliance with applicable legal and other requirements (i.e. the DA and EPL).

STATUS OF PREVIOUS AUDIT 2019 RECOMMENDATIONS

AUDITEE: HIGHLAND PINE PRODUCTS PTY LTD

REFERENCE	RECOMMENDATION	ACTIONED (Y/N)	IMPLEMENTATION STAUS - SEPTEMBER 2021	OPEN/CLOSED
Development Consent DA 403-11-00 Conditions				
DC:19-1	**HPP liaise with DPE as to the best process under the Environmental Planning and Assessment Act, or an associated Act to modify consent conditions which are no longer directly relevant for the operations e.g. car park spaces, western by-pass, noise limits, incorporating of monitoring into Greater Oberon Timber Complex.**	**Y**	In late 2019 / early 2020 HPP liaised with DPE regarding the modification of consent conditions (sighted letter from HPP to DPE dated 8 oct 2019 and email dated 15 Oct 2019 to and from DPE). Reportedly, these discussions went backwards and forwards and was considered an elevated risk by management at the time to change so due to this and challenges associated with COVID 19 nothing further was progressed. The site advises that there are future potential changes at the site that will require a planning permit and so will review modification to the existing consent conditions as part of that application process.	**OPEN**
DC:19-2	**Include a plan within the EMP illustrating where environmental monitoring points are located - air, water, groundwater and noise (surrounding area).**	**Y**	The current version of the EMP (Feb 2021) now contains plans showing the location of monitoring points for air, noise, groundwater and surface water discharge.	**CLOSED**
DC:19-3	**During the next EMP update, review the references section to ensure it specifies relevant Acts and Regulations applicable to the site.**	**Y**	There are references in the current EMP (Feb 2021) provided at the time of the audit that still need to be updated.	**IN PROGRESS**
DC:19-4	**Progress the hand- over of information from CHH systems to capture all complaint records and improvement action items from audits over the past 4 years.**	**Y**	This work was progressed and CHH data was obtained where possible. All data is now HPP records, and reviewed data back to 2017/18 demonstrating 4 years of records are being retained.	**CLOSED**
DC:19-5	**Prior to purchasing timber chip for boiler fuel, have the Environmental Advisor sign off it is fit for purpose and contains no hazardous materials e.g. treated painted or engineered timber, impurities (metals, plastics), etc.**	**Y**	External fuel is purchased from a single supplier. Sighted letter from HPP to fuel supplier (No date) and from fuel supplier (Australian Native Landscapes dated 7 June 2021) that the fuel material supplied by Australian Native Landscapes meets the HPP standard fuel criteria	**CLOSED**
DC:19-6	**Seek DPE approval of the current version of the Waste Management Plan.**	**Y**	Submission of the WMP to the DPE was made on the 19 November 2019. DPE responded via email with comments on the WMP on the 2 December 2019 to which HPP provided additional information via email on 13 January 2020. Sighted an email from DPE (dated 25 May 2020) confirming that from their perspective the comment made by Oberon Council regarding the WMP satisfied the consultation requirement. However, it is still not clear if DPE have approved the WMP.	**OPEN**
DC:19-7	**Prepare a Landscape Management Plan and provide to the D-G for approval.**	**Y**	A Landscape Management Plan has been developed and has been provided to DPE, However it is not clear that the Director General has given approval of the LMP.	**OPEN**
DC:19-8	**Add compliance assessment & reporting timeframes with reminders into the Risk Manager (or equivalent) scheduler as a means to mitigate the risk of future consent action item non-compliances.**	**Y**	The requirement for AEMR and IEAs, EPL and NPI obligations and notifications have been entered into HPP Risk Manager Program	**CLOSED**

REFERENCE	RECOMMENDATION	ACTIONED (Y/N)	IMPLEMENTATION STAUS - SEPTEMBER 2021	OPEN/CLOSED
DC:19-9	HPP consider aligning the AEMR and EPA Licence Annual Return to avert the doubling reproduction of some data.	Y	HPP have reviewed and will align in accordance with new planning permit conditions when that process happens as per DC19-1 above	CLOSED
EPL 11229 Conditions				
EPL:19-1	Develop a system for management and control of H2 waste including operator training to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. (This may alter if permission is granted by EPA to burn bifenthrin treated timber following a proof of destruction testing program). There may be options to re-use these residues as a beneficial re-use, e.g. fuel, MDF.	Y	A system has been developed for management and control of H2 waste including operator training (SOP) to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. H2 timber is now captured in labelled bins and transferred to BORG for reuse under a beneficial reuse agreement, resulting in diverting this waste away from landfill.	CLOSED
EPL:19-2	a) Undertake testing to correlate the Opacity meter with particulate emission levels such that it can be used as both a compliance device and a control tool for boiler operators to regulate fuel/ air mix and overfire air controls.	Y	Correlation between the opacity monitor and particulate emissions has been adjusted but still only serves as a guide and is not a compliance measure.	IN PROGRESS
	b) Set out an SOP such that operators may be trained in the use of the opacity monitoring system to maximise boiler combustion efficiency.	Y	Sighted operators Screen. Sighted a number of SOPs that have been developed to provide guidance to operators in how to manage upset conditions: Sighted SOP: HP-S-KI-BO-10 Monitor Boiler Operations (dated 27/07/2016 and latest review was on 15/11/2019) Sighted SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019) Sighted SOP: HP-S-KI-BO-63 Correct Furnace Positive Pressure (dated 11/04/2018)	CLOSED
EPL:19-3	Ensure doors not required for access are closed along the south boundary to prevent noise breakout at night.	Y	Sighted Photographic evidence of doors along the Drymill wall being kept closed and at the Drymill retry.	CLOSED
EPL:19-4	Improve Bifenthrin treatment plant design compliance with the ANZS 2843.1 Standard including:			
	a) Part 1, Section 1.6. Labels. Colour code pipe runs and include transfer runs in a schematic plan.	Y	Labels were recently purchased and are in the process of being updated. Reportedly colour coding of pipes is not required under the standard.	IN PROGRESS
	b) Part 1 Section 2.4 Water Bodies: Install a groundwater monitoring bore downgradient outside the treatment plant bunded area to support no loss of containment through the floor and sumps.	N	No downgradient GW monitoring bore has been installed.	OPEN
	c) Part 1, Sect 3.8 & Part 2 2.1 Emergency Plans & 2.8 Signs; Access & Signage: Re-label the Emergency Exit sign leading into the H2 Preservative mix area given it is a locked area and provides no escape.	Y	As above, labels were recently purchased and are in the process of being updated.	IN PROGRESS
	d) Part 1, Sect 4.7.2 Backflow Precautions: Review whether the backflow protection device is positioned correctly and is upstream from all flow lines to protect potable water supply.	Y	Backflow protection of the H2 line has now been installed. Sighted photographic evidence	CLOSED
	e) Part 1 Sect 4.7.3 - Auto Shut off and containment: Confirm that the level device and alarm in the water sump is included in the preventative maintenance MEX checking system.	Y	Has been added into MEX. Sighted MEX to check functionality of S2DM Treatment Mixing Bunded Area (high) level sump alarm	CLOSED
	f) Part 1 Sect 3.5: Containment: add a double skin (extra pipe) around the pipes that run outside the building from the bifenthrin mixing area to the bunded application area so that line leakage would drain back into the bunded area (e.g. secondary pipe control).	Y	Double skin piping has been added around the pipes. Sighted photographic evidence.	CLOSED
	g) Part 1 Sect 3.5 Containment: relocate the dripping hoses from the wall potentially outside the bunded area back into the bunded areas.	Y	Hoses are stored inside the bunded area	CLOSED

REFERENCE	RECOMMENDATION	ACTIONED (Y/N)	IMPLEMENTATION STAUS - SEPTEMBER 2021	OPEN/CLOSED
EPL:19-5	Ensure a program to calibrate the SICK opacity meter is undertaken during the next scheduled particulate and NOx stack emission compliance test.	Y	Auto calibration occurs every 3 - 4 hrs. One test is conducted annually to correlate the numbers.	CLOSED
EPL:19-6	Continue to assess trends in groundwater to evaluate impact; particularly the nitrate concentration. If the trend continues upwards, undertake a risk assessment of likely impact to off- site receptors.	Y	Groundwater monitoring continues to be conducted 6 monthly in accordance with EPA licence (sighted monitoring records). Nitrate concentrations appear to be remaining static.	CLOSED
EPL:19-7	Investigate the reason for weather monitoring station data drop-outs; in particular check battery condition.	Y	No longer applicable. The requirement for a weather station has been removed from EPA licence 11229	CLOSED
EPL:19-8	Add the regulatory notification process into HPPs Risk Manager program so that a record is captured and readily accessible.	Y	The requirement for AEMR and IEAs, EPL and NPI obligations and notifications have been entered into HPP Risk Manager Program	CLOSED
Environmental system and plan specifications				
EMS:19-1	Develop a new SOP capturing control over treated timber required including movement of liquid residues and empty container labelling and storage. Train all relevant operators in the SOP.	Y	The site has reported that they no longer generate liquid chemical waste at the H2 line. All waste liquids are recycled back into the process as “make-up” water. Previously they would remove liquids in IBC’s but that no longer occurs as the risk was too high. Any sludge type waste (wood flour build up over months of recycling) is absorbed into spill-sorb and taken away as solid waste by Cleanaway. Any liquids (including spills onto the ground) are pumped back into the system where its filtered for reuse.	CLOSED
EMS:19-2	Add to MEX an inspection process for the floor and sumps of the H2 application and mix areas and any sump level controls calibration.	Y	Has been added into MEX. Sighted MEX to inspect the bunded area under the Treatment Application location	CLOSED
EMS:19-3	Add to MEX an inspection of the roof vents at the H2 Application area where filters are changed to document no overcarry nor clean up required.	Y	Has been added into MEX. Sighted MEX to inspect Roof Area around S2DM treatment spray booth vents	CLOSED
EMS:19-4	Verify and hold documentation that the contractors transporting treated timber waste are Licenced.	Y	Treated timber is now collected by Borg for reuse in beneficial reuse program	CLOSED
EMS:19-5	Make sure all operators have access to chemical SDS data via an on-line system as some chemical information was not available in hard copy at stations.	Y	Sighted screenshot of CHEMWATCH used for online access of SDS data	CLOSED
EMS:19-6	Include responsibilities for completing the NPI (and potentially NGERS) reporting process in the EMP (or broader EMS) under the new AKD Softwoods ownership regime.	Y	Requirement for annual NGERS and NPI reporting have been added into Risk Manager with responsibilities assigned. Environmental Reporting under the EMP are assigned responsibility to the Site Environmental Consultant and Site Services Manager	CLOSED
EMS:19-7	During the next iteration and QA review of the PIRMP, SWMP and WMP management plans, review the responsibilities matrix's to ensure they all align.	Y	This was reviewed and Responsibilities Matrices exist within the SWMP and WMP.	CLOSED
	a) Investigate scope for burning bark within the boiler furnace to replace purchased fuel needs from off-site, provide sale options for a quantity of the chipped timber and therefore a net financial benefit to site operations.	Y	This was investigated by the site and it was concluded that there was no viable value in burning bark through the boiler.	CLOSED

REFERENCE	RECOMMENDATION	ACTIONED (Y/N)	IMPLEMENTATION STAUS - SEPTEMBER 2021	OPEN/CLOSED
EMS:19-8	**b) A procedure to optimise combustion efficiency controls to ensure air discharge compliance will need to pre-date any change to fuel use.**	**Y**	Sighted a number of SOPs that have been developed to provide guidance to operators in how to manage upset conditions: Sighted SOP: HP-S-KI-BO-10 Monitor Boiler Operations (dated 27/07/2016 and latest review was on 15/11/2019) Sighted SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019) Sighted SOP: HP-S-KI-BO-63 Correct Furnace Positive Pressure (dated 11/04/2018)	**CLOSED**
EMS: 19-9	**Complete a review of site generated waste to evaluate beneficial re-use opportunities as opposed to landfill.**	**Y**	HW waste is now sent to Borg under a beneficia re-use opportunity	**CLOSED**
Boiler Furnace Optimisation				
Boiler:19-1	**Review the existing Sitec control system with a view to making it easier for operators to understand and respond to combustion improvement using currently available monitoring information.**	**Y**	Screenshot of boiler control system provided which was reviewed with managers and operators to determine what was needed to be displayed to effectively manage controls. Sighted a number of SOPs that have been developed to provide guidance to operators in how to manage upset conditions: Sighted SOP: HP-S-KI-BO-10 Monitor Boiler Operations (dated 27/07/2016 and latest review was on 15/11/2019) Sighted SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019) Sighted SOP: HP-S-KI-BO-63 Correct Furnace Positive Pressure (dated 11/04/2018)	**CLOSED**
Boiler:19-2	**Optimise the boiler operator screens and units to facilitate accuracy of information and enable ready interpretation of combustion data.**	**Y**	As above.	**CLOSED**
Boiler:19-3	**Provide the ability to adjust the mix of under-fire and overfire air in relation to percentage of the feed rate.**	**Y**	Operators control this on the boiler controls system screen. Sighted SOP: HP-S-KI-BO-10 Monitor Boiler Operations (dated 27/07/2016 and latest review was on 15/11/2019) Sighted SOP: HP-S-KI-BO-62 Correct a Smoking Boiler Stack (dated 09/04/2018 and latest review was on 19/08/2019) Sighted SOP: HP-S-KI-BO-63 Correct Furnace Positive Pressure (dated 11/04/2018)	**CLOSED**
Boiler:19-4	**Optimise the overfire air burning zone closer to the furnace bed.**	**Y**	This was reviewed with boiler operators and concluded that they can't burn any closer to the furnace bed.	**CLOSED**
Boiler:19-5	**Investigate feasibility of a bark hammer mill with payback against fuel purchase, grate replacement, downtime and sale of existing dry material (chip).**	**Y**	This was investigated and it was determined not to be a viable option.	**CLOSED**
Boiler:19-6	**Insulation is required over valve bodies and the currently exposed top of the boiler to improve efficiencies.**	**Y**	Sighted Photographic evidence of lagging work being progressed	**CLOSED**
Boiler: 19-7	**Assess beneficial re-use opportunities for ash as opposed to landfill disposal.**	**Y**	Sighted a proposal which has been developed and is currently being implemented to avoid sending ash to landfill and recycle as a soil reconditioner. It is estimated that this will reduce the volume of waste to landfill by 30%.	**CLOSED**

APPENDIX K

SUMMARY OF COMPLETED TASKS (IEA 2019 & 2021)

Appendix K – 2021 AEMR – Actions Completed from Previous Reviews.

No.	Name of Review	Action Required	Requested by	Action taken by the Operator
1	Annual Environmental Management Report 2015	Air Emissions - Over-fired air system	EPA	Completed
2	Envirorisk External Audit 2015	Include licence renewals and reporting obligations within Risk Manager compliance system	Envirorisk	Completed.
3	Envirorisk External Audit 2015	Review the 'Blueframe' treatment plant areas and upgrade to comply with AS 2843.1 & .2 as detailed in Table E1 of Envirorisk report	Envirorisk	Completed. Process has now been updated where applicable.
4	Envirorisk External Audit 2015	Improve boiler operation to bring particulate emissions to 250 mg/m3.	Envirorisk	Completed
5	Envirorisk External Audit 2015	Update the EMP/ WMP	Envirorisk	Completed.
6	Envirorisk External Audit 2015	Remove sawdust off the fuel shed roof and repair any conduit leaks or roof gaps.	Envirorisk	Completed on the day.
7	Envirorisk External Audit 2015	Advise all residue truck drivers and contractors of the requirement to cover their loads prior to site departure.	Envirorisk	Completed.
8	Annual Return	Error on EPA annual return pro-forma. Confusion between gas density and molecular weight units.	HPP	Error reported to EPA Bathurst. Completed, see EPA Variation Notice 1567059 dated 13 July 2018.
9	External Audit 2019	Prior to purchasing timber chip for boiler fuel, have the Environmental Advisor sign off it is fit for purpose and contains no hazardous materials e.g., treated painted or engineered timber, impurities (metals, plastics), etc.	EnviroRisk	Completed.
10	External Audit 2019	Seek DPE approval of the current version of the Waste Management Plan.	HPP	Completed
11	External Audit 2019	Prepare a Landscape Management Plan and provide to the D-G for approval.	EnviroRisk	Completed – update early 2021.

Appendix K – 2021 AEMR – Actions Completed from Previous Reviews.

No.	Name of Review	Action Required	Requested by	Action taken by the Operator
12	External Audit 2019	HPP consider aligning the AEMR and EPA Licence Annual Return to avert the doubling reproduction of some data.	EnviroRisk	Assessed. Requires consent (DA) modification.
13	External Audit 2019	Develop a system for management and control of H2 waste including operator training to ensure treated Bifenthrin timbers do not enter the boiler fuel waste re-use stream. (This may alter if permission is granted by EPA to burn bifenthrin treated timber following a proof of destruction testing program). There may be options to re-use these residues as a beneficial re-use, e.g., fuel, MDF.	EnviroRisk	Completed
14	External Audit 2019	) Undertake testing to correlate the Opacity meter with particulate emission levels such that it can be used as both a compliance device and a control tool for boiler operators to regulate fuel/ air mix and overfire air controls. b) Set out an SOP such that operators may be trained in the use of the opacity monitoring system to maximise boiler combustion efficiency.	EnviroRisk	Completed
15	External Audit 2019	Develop a new SOP capturing control over treated timber required including movement of liquid residues and empty container labelling and storage. Train all relevant operators in the SOP.	EnviroRisk	Completed as part of the Waste Management Plan.
16	External Audit 2019	Verify and hold documentation that the contractors transporting treated timber waste are Licenced.	EnviroRisk	Completed.

Appendix K – 2021 AEMR – Actions Completed from Previous Reviews.

No.	Name of Review	Action Required	Requested by	Action taken by the Operator
17	External Audit 2019	Make sure all operators have access to chemical SDS data via an on-line system as some chemical information was not available in hard copy at stations.	EnviroRisk	Completed. SDS are now maintained in the shift leader's office.
18	External Audit 2019	a) Investigate scope for burning bark within the boiler furnace to replace purchased fuel needs from off-site, provide sale options for a quantity of the chipped timber and therefore a net financial benefit to site operations. b) A procedure to optimise combustion efficiency controls to ensure air discharge compliance will need to pre-date any change to fuel use.	EnviroRisk	Investigated. Not considered viable given the saleable value and calorific value of bark. Introduction of clinker (silica from soils in bark melting) will adversely affect the plant operations.
19	External Audit 2019	Complete a review of site generated waste to evaluate beneficial re-use opportunities as opposed to landfill.	EnviroRisk	Partially completed. H2 timber currently sent to borg under resource recovery framework. Ash currently under review.
20	External Audit 2019	Investigate feasibility of a bark hammer mill with payback against fuel purchase, grate replacement, downtime and sale of existing dry material (chip).	EnviroRisk	Completed. Not a viable option given the cost of hammer mill, impacts of burning bark and generation of clinker in the boiler fire box. The site will not pursue the option.
21	External Audit 2019	Assess beneficial re-use opportunities for ash as opposed to landfill disposal.	EnviroRisk	Under investigation. Delivery 2021 subject to reg. approval.
22	External Audit 2021	Update the EMP to include specific units of measurement (consistent with EPL 11229) within the Groundwater Environmental Monitoring Requirements	EnviroRisk	Complete – Updated – RM updated as part of the site Obligations.
23	External Audit 2021	Undertake annual update of the onsite Community Complaint Logbook.	EnviroRisk	Completed – annual req in RM
24	External Audit 2021	Update the EMP to provide a consistent requirement for review frequency.	EnviroRisk	Completed – Updated.

Appendix K – 2021 AEMR – Actions Completed from Previous Reviews.

No.	Name of Review	Action Required	Requested by	Action taken by the Operator
25	External Audit 2021	Replace the damaged rubber curtain at the Drymill re-entry sticker conveyor tocontribute to noise attenuation from this area.	EnviroRisk	Completed – Curtain replaced – Routine inspection in MEX
26	External Audit 2021	Include in monitoring results tables in the AEMR's the criteria against which monitoring parameters are assessed (i.e. 250 mg/m3 for Total Solid Particles (TSP)and 2500 mg/m3 for NOx).	EnviroRisk	Completed and updated as described
27	External Audit 2021	Engage a contractor as soon as reasonably practicable to clean out the gross pollutanttraps and empty the overtopping oil container at the fuel station.	EnviroRisk	Completed.
28	External Audit 2021	Arrange for drums to be removed from the empty drum storage as soon as COVIDlockdown lifts. Also add signage at the drum storage area that all drums must be stored within the bund.	EnviroRisk	Complete. Signage not updated although process changed to ensure adequate controls.
29	External Audit 2021	Relocate bulk ink containers in the Drymill to be stored in a bunded area	EnviroRisk	Completed.