

FINAL

Waste Management Plan

Borg Panels

124 Lowes Mount Road, Oberon NSW

Borg Panels Pty Ltd

24 November 2017

Revision History


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

1.1 Background

Borg Panels operates an existing Medium Density Fibreboard (MDF) manufacturing facility in Oberon, NSW. This facility manufactures a range of Customwood MDF products including:

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

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

Condition B51 of Development Consent SSD 7016 requires the preparation of a Waste Management Plan (WMP) for the Existing Development to manage waste generated at site. The Existing Development comprises the MDF plant and multi-daylight (MDL) plant as unmodified.

This WMP has been prepared to satisfy Condition B51 and Condition C9 of Development Consent SSD 7016 and is a sub plan to the Operational Environmental Management Plan (OEMP) (Condition C4).

1.2 Purpose and Objectives

The purpose of this WMP is to provide the management and performance requirements related to waste at the Borg Panels facility, and includes:

- Requirements for management of waste for operations at the facility as stipulated by regulatory approvals for the Existing Development;
- Description of potential sources of wastes and risks related to waste management;
- Description of the environmental controls to meet objectives, and regulatory approval requirements; and
- Overview of the environmental monitoring programs associated with environmental controls and management actions.

The objectives of the WMP are to:

- Advise site personnel of their responsibilities in managing waste generated at the site; and
- Ensure compliance with the conditions of approval related to waste management.

1.3 Structure of this Waste Management Plan

This WMP has been developed to manage waste generated by the Existing Development and to satisfy the requirements set out in Condition B51 of Development Consent SSD 7016, and includes information on the following:

- Section 2 – Legislative and Regulatory Compliance
- Section 3 – Process Overview
- Section 4 – Implementation
- Section 5 – Incidents and Complaints Management
- Section 6 – Monitoring and Review

1.4 Approval of the WMP

The Final WMP has been submitted to the Secretary of the Department of Planning and Environment (DP&E) for approval. Correspondence from DP&E is included in **Appendix A**.

2 Legislative and Regulatory Compliance

2.1 Relevant Legislation

Key environmental legislation relating to waste management for the Existing Development includes:

- *Protection of the Environment Operations Act 1997*;
- *Protection of the Environment Operations (Waste) Regulation 2014*; and
- *Waste Avoidance and Resource Recovery Act 2001*.

2.2 Conditions of Consent

The Existing Development operations are subject to the conditions contained in Development Consent SSD 7016 dated 29 May 2017.

The specific requirements for a WMP (Schedule 2, Condition B51) and general requirements for environmental management plans (Schedule 2, Condition C9) are detailed in **Table 1**.

Table 1 - Development Consent Conditions

No.	Requirement	Document Reference
	WASTE MANAGEMENT	
	Waste Management Plan	
B51.	Within 6 months of the date of this consent, the Applicant must prepare a Waste Management Plan (WMP) for the Existing Development to the satisfaction of the Secretary. The WMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C9. The WMP must:	This Plan
	a) detail the type and quantity of waste generated by the Existing Development;	Section 3
	b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act, <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (Department of Environment, Climate Change and Water, 2009);	Section 4
	c) detail the materials that are being reused or recycled, either on or off site; and	Section 4
	d) include the Management and Mitigation Measures included in Appendix B.	Section 2.3

No.	Requirement	Document Reference
	MANAGEMENT PLAN REQUIREMENTS	
C9	The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:	Revision History
	a) detailed baseline data;	Section 3
	b) a description of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; 	Section 2
	c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	Section 4
	d) a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the Development; and (ii) effectiveness of any management measures (see (c) above); 	Section 6
	e) a contingency plan to manage any unpredicted impacts and their consequences;	Section 5.4
	f) a program to investigate and implement ways to improve the environmental performance of the Development over time;	Section 4.3
	g) a protocol for managing and reporting any: <ul style="list-style-type: none"> (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and 	Section 5
	h) a protocol for periodic review of the plan.	Section 6.5
	Note: These requirements also apply to the preparation or updates of management plans for the Existing Development and the Project.	

2.3 Development Consent SSD 7016 Mitigation Measures

Appendix B Applicant's Management and Mitigation Measures to Development Consent SSD 7016 details the reasonable and practical measures to avoid or minimise impacts to the environment that may arise as a result of the Project. There are no mitigation measures relating to the Existing Development as unmodified.

2.4 Environment Protection Licence

Environment Protection Licence 3035 (EPL 3035) specifies waste that may be received at the premises and use of that waste during operation of the Existing Development.

Condition L3 Waste of EPL 3035 states:

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	Non-standard Fuel sourced from materials generated within the Oberon Timber Complex	As defined in condition L6.2		Used in accordance with conditions L6.1 and L6.2
NA	Non-standard Fuel generated offsite from material originally manufactured within the Oberon Timber Complex	As defined in Condition L6.2		Used in accordance with conditions L6.1 and L6.2

Note: For the purposes of condition L3.1, the Oberon Timber Complex refers to the businesses known as Structaflor, Highland Pine, Borg Panels and Woodchem.

Condition L6 Other limit conditions of EPL 3035 states:

L6.1 Only the following materials may be used as fuel within the Conti 1 and Conti 2 heat plants:-

- a) Standard Fuel; and*
- b) Non-Standard Fuel.*

L6.2 For the purposes of condition L6.1, Non-Standard Fuels are those fuels that have been assessed by the EPA as being appropriate for use as a fuel additive and comprise those materials that are derived from on-site activities. Non-Standard Fuels currently approved for use are:-

- a) MDF Board;*
- b) Shredded MDF Board;*
- c) Sander Dust;*
- d) Laminated MDF Board;*
- e) Water Treatment Plant sludge; and*
- f) Saw dust/off-cuts sourced from Bearers 4 U Pty Limited (Lot 4 Albion Street, Oberon)*

3 Process Overview

3.1 MDF Plant

3.1.1 General

The MDF plant produces MDF from the compression and densification of wood fibres treated with Melamine/Urea Formaldehyde polymer and wax. The MDF plant operates with two fully automated press lines producing boards of various dimensions. Product from the MDF plant is also used in the mouldings plant.

There are two heat plants (HP) in operation supplying heat to the MDF plant. Fuel from the heat plants is sourced from both raw materials purchased for the plants and waste products obtained in accordance with EPL 3035 requirements (**Section 2.4**).

A schematic overview of the MDF process is shown in **Figure 1**.

3.1.2 Waste Streams

The following waste streams are generated in the MDF plant:

- Bark;
- Oversize and undersize wood chips;
- Fibre;
- Off-spec product / reject board;
- Sawdust and sanding belts;
- MDF trim;
- Packaging materials; and
- Heat plant ash.

3.1.3 Bark

Sorted logs are transferred to a debarking plant either directly from incoming trucks or from the log yard. Bark from this process falls to a lower deck and is collected by a scraper, which feeds the bark to a conveyor and stockpile.

Bark and other log wood refuse is then used as fuel for the heat plant or on-sold for landscaping purposes.

3.1.4 Oversize and Undersize Woodchips

De-barked logs are fed into a chipper, which converts the full log into a standard size chip suitable for further processing. The created chip is then fed by conveyor onto the chip piles. Chips are stored in large chip piles that utilise horizontal screw reclaimers at the base of the piles to feed chips into the refining process. Chips are screened and washed prior to the refining process to remove any oversize or undersize chip fractions and any stones, metal, or dirt that may cause process disruptions or flaws in the finished product. Undersize and oversize chip is collected and fed as fuel to the MDF heat plants.

3.1.5 Fibre – Prior to Press Line

Following washing, dewatered chips are refined into fibre. Fibre is produced by passing wood chip through a defibrator, a steam pressurised disk refinement process. The fibre produced is light and fine, which means it is easily spread by wind.

Wax and resin are added to the fibres before the fibre drying process. Wax is added to improve the moisture resistance of the board, and resin is added as an adhesive for the MDF board pressing process.

Process disruptions during start-up or fibre production can lead to a 'fibre dump' from the dryer start-up cyclone. Dumped fibre is collected in designated fibre dump pits located in the outdoor MDF plant area. The quantity of fibre dumped is not officially recorded either manually or automatically as part of the process control system. The size of the fibre 'dump' varies according to whether the dump is due to process start-up and shut-down or process disruptions.

The fibre dumps are generally constructed with three surrounding walls and an open front to allow collection of the fibre by a front-end loader. This design provides some protection from the risk of windblown fibre spreading throughout the plant.

Additionally, a street sweeper operates on a full-time basis to collect and control the spread of fibre across the outside areas of the MDF plant, and subsequently the spread of windblown fibre to other areas of the timber complex and surrounding properties. Fibre collected by the street sweeper is placed in the fibre dumps.

Fibre from the fibre dumps is taken to the fuel storage and mixing bunker at the MDF plant for blending with other approved fuels for use in the MDF heat plants.

Loose fibres from within enclosed buildings of the MDF plant are collected with a vacuum, which is also emptied into the fibre dumps.

3.1.6 Fibre – Press Line

Ensuring the fibre matt is of appropriate quality and thickness is essential to achieving the required finished product standard. Therefore the fibre quality is subject to online analysis following the pre-press. If unsatisfactory, the load of fibre on the conveyor can be ‘dumped’ prior to entering the press.

The edges of the pre-pressed matt are trimmed to provide a clean edge prior to the main press. Trimmed fibre is recycled back in to the process, with return to fibre storage prior to the pre-press. There is no online analysis of the flowrate of fibre back into the process from the pre-press, or of reject fibre to the fibre dumps.

3.1.7 Reject Board

The quality of MDF exiting the main press is analysed online, with board that fails to meet the required standard being rejected prior to entering the star cooling wheel. The quantity of reject board from both the Conti 1 and Conti 2 press lines is recorded in the daily operations reports.

Board can also be rejected at later stages of the process by visual inspection. Board can be rejected from the production line by operators following sanding and trimming, and prior to packaging.

Rejected board from the press-line and later production stages is stockpiled for later use, predominantly as product packaging bearers. Left overs and offcuts from the bearer making process are used as fuel in the MDF heat plant.

3.1.8 Sawdust and Sanding Belts

Following cooling and storage, MDF is sanded down to the required thickness and finish. Sawdust from the sanding process is collected under vacuum to a baghouse filter, prior to being blown across to sawdust storage silos at the MDF heat plant.

Sanding belts are approximately 2.65 m x 2.8 m, and come packaged in large cardboard boxes. Approximately 1 belt per head requires changing each 12 hour shift. There are two thicknesses of finishing heads. Both the sanding belts and their cardboard packaging are disposed of as general waste to landfill.

3.1.9 MDF Trim

MDF is cut to the required size boards according to different product requirements. Trim offcuts can vary according to the product being produced. Wood trim from the trim saws (both the length and width cut) is automatically dropped onto a conveyor belt and fed to a wood hogger. The board is crushed and broken into smaller pieces in the hogger, which is then blown across to the fuel storage and mixing bunker for the MDF heat plant.

3.1.10 Product Packaging

MDF products are packaged using wood bearers, plastic strapping and plastic shrink wrap. All packaging wastes are disposed of as general mixed waste to landfill.

The plastic strap used in the MDF plant is recyclable, however there is no segregated collection of plastic strap for recycling at the MDF plant.

3.1.11 Heat Plant Ash

Ash is the main waste stream from the heat plant. Ash is disposed of to landfill.

3.2 Mouldings Plant

3.2.1 General

The mouldings plant processes MDF sheets into finished (painted) mouldings suitable for use as skirting boards, doorjams and architraves.

The main input materials to the mouldings process include MDF sheets from the MDF plant, paint, plastic wrap and strapping used in the final product packaging.

MDF sheets are cut to the required size using a multi-saw, prior to moulding and sanding to the required style and shape. The mouldings undergo a two stage (two coat) painting process with drying and intermediate de-nibbing (rubbing down) between paint stages, prior to visual inspection of the product, packaging, storage and delivery of product to markets.

A schematic overview of the mouldings process is shown in **Figure 2**.

3.2.2 Waste Streams

The following waste streams are generated in the mouldings plant:

- Plastic strapping and packaging from MDF receipt;
- Product trim and offcuts;
- Sawdust;
- Paint, paint filters, and paint washdown;
- Product packaging; and
- Reject material.

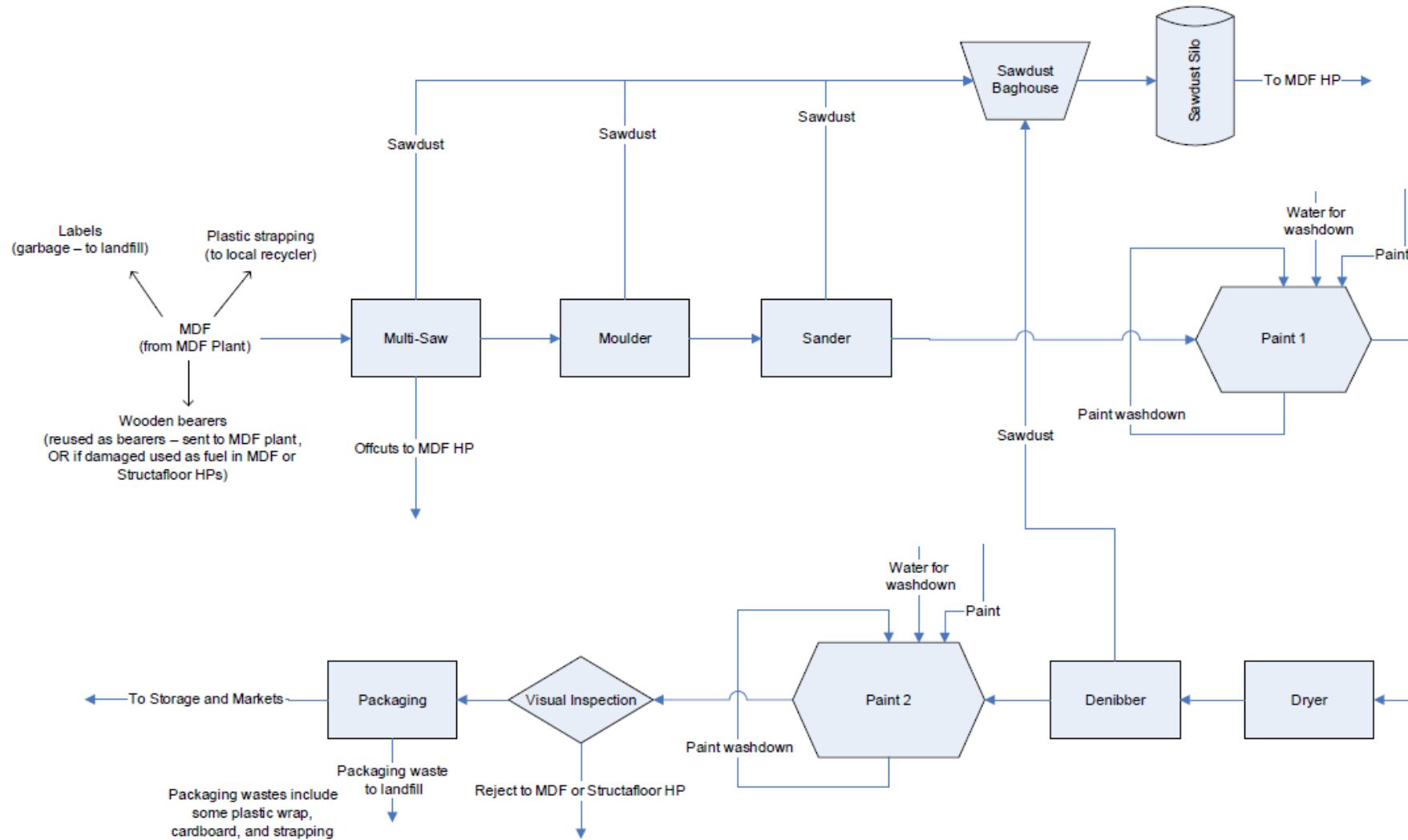


Figure 2 – Schematic Overview of the Mouldings Production Process

3.2.3 Plastic Strapping and Packaging from MDF Receival

MDF sheets delivered to the mouldings plant are stacked on wood bearers supported with plastic strapping and are labelled.

The plastic strapping removed from the MDF is recyclable, however there is no segregated collection of plastic strap for recycling at the mouldings plant. MDF labels (equivalent to a printed A4 sheet) are disposed of as general waste.

Wood bearers are reused wherever possible. Undamaged wood bearers are returned to the MDF plant for reuse. Damaged wood bearers are collected and sent to the heat plants for use as fuel.

3.2.4 Product Trim and Offcuts

MDF offcuts from the initial sawing process are collected and sent to the MDF heat plants for use as fuel. The amount of offcuts is dependant on the product specification and size of MDF board.

3.2.5 Sawdust

Sawdust from the sawing line, moulder, and sander is collected under vacuum to a baghouse filter, prior to being blown across to sawdust storage silos at the MDF heat plants.

Material removed from the painted timber surface in the denibbing process (following the first painting stage) is collected under vacuum to a baghouse filter, prior to being blown across to sawdust storage silos at the MDF heat plants.

Sawdust is also used to clean up any paint spillages. Paint soaked sawdust is dried and disposed of to a suitable landfill location.

3.2.6 Paint, Paint Filters and Paint Washdown

Painting is undertaken in a bunded area, allowing for cleaning and washdown of each painting area. The area is cleaned using water, and the washdown water is recycled back into the process via mixing with fresh paint in the paint day-tank or is sent to the water treatment plant for treatment.

Paint filters are cleaned and reused as required.

3.2.7 Product Packaging

Waste streams generated from the packaging line include:

- Cardboard boxes (received from delivery of packaging materials);
- Cardboard cores from rolls of plastic wrap;
- Damaged wood bearers;
- Plastic wrap; and
- Plastic strapping offcuts from the strapping machine.

Finished mouldings are stacked on laminated wooden bearers prior to strapping and covering with plastic wrap. Plastic wrap used in the wrapper is coiled over a cardboard core that is currently not returnable to the manufacturer, thus the cores are disposed of as general waste to landfill.

Bearers used to support mouldings products are made from MDF or untreated wood, therefore they are suitable for use as fuel in the MDF heat plants. Attempts are made to repair and reuse damaged wood bearers as much as possible. Broken bearers are used for fuel in the MDF heat plants.

3.2.8 Reject Material

Product is subject to visual inspection following application of the second coat of paint and prior to packaging. Product that fails to meet the required quality standard is removed from the process and recorded as reject. Rejected product is stockpiled for use as fuel in heat plants.

3.3 Paper Treater

3.3.1 General

The paper treater manufactures resin treated paper films that are used to laminate onto the surface of the MDF and particle board sheets. These films provide colour, texture and durability to the surface of the board.

The paper treatment process uses urea and melamine formaldehyde adhesives which are saturated into and onto a continuous paper web. The resin filled paper web is dried sufficiently, in gas fired flotation ovens, until they no longer tack together when placed in contact with one another.

The continuous web is then cut into suitable sized sheets or reeled onto a core for use on a continuous laminating pressline.

3.3.2 Waste Streams

Waste streams generated from the paper treatment process include the following items:

- Raw paper;
- Cardboard cores;
- Waste resin;
- Dried treated paper; and
- Wet treated paper.

3.3.3 Raw Paper

The dense cardboard protective outer wrapping of the paper rolls is removed prior to preparation for the paper treatment process. Additionally, some of the decorative raw paper is also recycled or sent to the MDF Heat plant to be used as fuel.

3.3.4 Cardboard Cores

Raw decorative paper is coiled over a cardboard core. Used cardboard cores are disposed of as general waste to landfill.

3.3.5 Waste Resin

Waste resin is generated at the end of a production run, or when there are process upsets to out of specification resin. End of run material can be pH stabilised and utilised during the next suitable production run. Out of specification material can be reused in the MDF board making process if the opportunity exists, otherwise it is chemically set to solidify and disposed of to landfill.

3.3.6 Dried Treated Paper

Dried treated paper is generated in process upset conditions when the continuous web is broken. This paper is very brittle and has no alternative uses, and is therefore sent to landfill.

3.3.7 Wet Treated Paper

Wet treated paper is generated in process upset conditions when the continuous web is broken. This wet paper has no alternative uses and is also sent to landfill.

3.4 Laminating Presses

3.4.1 General

Laminating presses are used to thermally fuse the treated paper to the surface of the MDF and particleboard substrate. They operate by applying heat and pressure to the treated paper leaf and board assembly, which activates the glue causing it flow and bond to the surface of the board product.

3.4.2 Waste Streams

Waste streams generated from the laminating press process include the following:

- Dry treated paper;
- Reject laminated board;
- Plastic film from wrapping; and
- Packaging.

3.4.3 Dry Treated Paper

Dry treated paper that is broken or damaged during setup of the laminating process is sent to landfill.

3.4.4 Reject Laminated Board

Board that is not suitable for resale after the laminating process is generally reused by sanding and then relaminated into A grade product. Alternatively, the board product is used in the bearer making process. Offcuts from the bearer making process are used onsite as fuel in MDF heat plants.

3.4.5 Plastic Film Wrapping

Plastic film is used for wrapping treated paper to prevent moisture ingress. Used plastic film is sent to landfill.

3.4.6 Packaging

Treated paper is transported for use at other manufacturing sites in flat sheets. The paper sheets are protected with thick MDF top and bottom. Treated paper for use onsite is rolled onto aluminium cores.

Both the MDF used for transport and aluminium cores used onsite are reused in the same process until end of life, at which time the MDF is sent to the heat plants for fuel and aluminium cores are recycled.

3.5 Water Treatment Plant

3.5.1 General

The on-site water treatment plant processes all the effluent (process water) generated from various activities at site. The water treatment plant utilises filtration and biological degradation to remove contaminants from the water for re-use, capturing over 300kL per day from the site and reusing it in the manufacturing process.

More detail on the function and operation of the water treatment plant is provided in the Surface Water Management Plan.

3.5.2 Waste Streams

Waste streams generated from operation of the water treatment plant include the following:

- Chemical containers;
- Brine; and
- Solids from filtration.

3.5.3 Chemical Containers

The water treatment plant requires chemicals for its operation, the chemicals are generally supplied in IBCs or bags for solid materials. Management of IBCs on-site is detailed in **Section 3.6.3**. Empty bags are disposed of to landfill.

3.5.4 Brine

The water treatment plant produces brine, a waste product from the Reverse Osmosis (RO) system, which is high in dissolved solids. Currently, Borg Panels have two options for disposal of brine:

- Dilution of resins in the manufacturing process which are then captured in the MDF; and
- Discharge of trade wastes into Council's sewerage system on the terms set out within the Trade Waste Service Contract.

3.5.5 Solids from Filtration

Dewatered waste sludge (biomass) from the centrifuge is sent to the heat plant as fuel for the furnace.

3.6 Common Waste Streams

The following waste streams are common to more than one process on-site, and are handled, processed and recorded collectively for the facility.

3.6.1 Scrap Metal

Scrap metal with potential for reuse within the MDF plant is stockpiled on site and reused wherever possible.

Other scrap metal that is not stockpiled is placed in scrap metal skip bins for removal from site to a metal recycler.

3.6.2 Waste Oil

Waste oil is collected from site for recycling by Transpacific.

3.6.3 Chemical Containers

Empty chemical containers are washed and stored on-site prior to recycling, reuse or disposal. A recycling initiative is being discussed with Veolia to return used IBC's to the supplier. Some IBC's are reused at site, with the remainder that are not re-purposed or are at end of life being cut up or crushed and sent to landfill.

Waste drums of metal construction are triple rinsed and sent to the recyclers.

Waste requiring burial is made up of urea formaldehyde spade-able resin and paraffin wax bladders. Quantities of these are sporadic and disposal of resin in this manner is considered as a last resort as the product has a high capital cost.

3.6.4 General Waste

All general waste from work areas, offices and staff amenities is collected in bulk skip bins and taken to Oberon Council Waste Depot for disposal. There is no segregation of recyclable materials.

3.7 Waste Quantities

A summary of estimated waste generation at the Borg Panels facility is provided in **Table 2**.

Table 2 – Summary of Waste Generated in Borg Panels Facility

Waste Stream	Estimated Annual Waste Generation	Disposal / End Use
Bark	17,000 tonnes	Fuel in heat plant or on-sold for landscaping purposes
Oversize and undersize woodchips	190,000 tonnes	Fuel in heat plant
Fibre	Not recorded	Fuel in heat plant
Reject Product	2,200 tonnes (assumed average density of 730kg/m ³)	Fuel in heat plant
Ash	860 m ³	Landfill
Sawdust	9,000 tonnes	Fuel in heat plant
MDF Trim and Offcuts	2,200 tonnes	Fuel in heat plant
Wood Bearers	Included in MDF trim and offcuts	Fuel in heat plant
Scrap Metal	Not recorded	Recycled
Waste Oil	27,100 litres	Recycled
Oil Drums	500 drums	Reused or returned
General Mixed Waste (sanding belts, cardboard, plastic strapping, shrink wrap, labels, paint filters, treated paper, general waste)	5,373 m ³	Landfill
Brine (from WTP)	100% reuse captured in MDF	Reuse or Trade Waste
Sludge (from WTP)	Not recorded	Fuel in heat plant
Chemical Containers (IBCs)	Included in general mixed waste	Reuse, recycle and landfill
Waste resin (spade-able or solidified) and paraffin wax bladders	84.2 tonnes	Bathurst Council Waste Management Centre – waste requiring burial

4 Implementation

4.1 Minimising Waste Production

Borg Panels aim to appropriately manage and minimise waste generation at the Oberon facility, including domestic waste production and the reuse and recycling of waste where possible.

4.2 Waste Hierarchy

Borg Panels will endeavour to manage the waste generated on site by following the best practices as set out in the *Waste Avoidance and Resource Recovery Act 2001*. The Waste Hierarchy of Control is detailed in **Figure 3**.

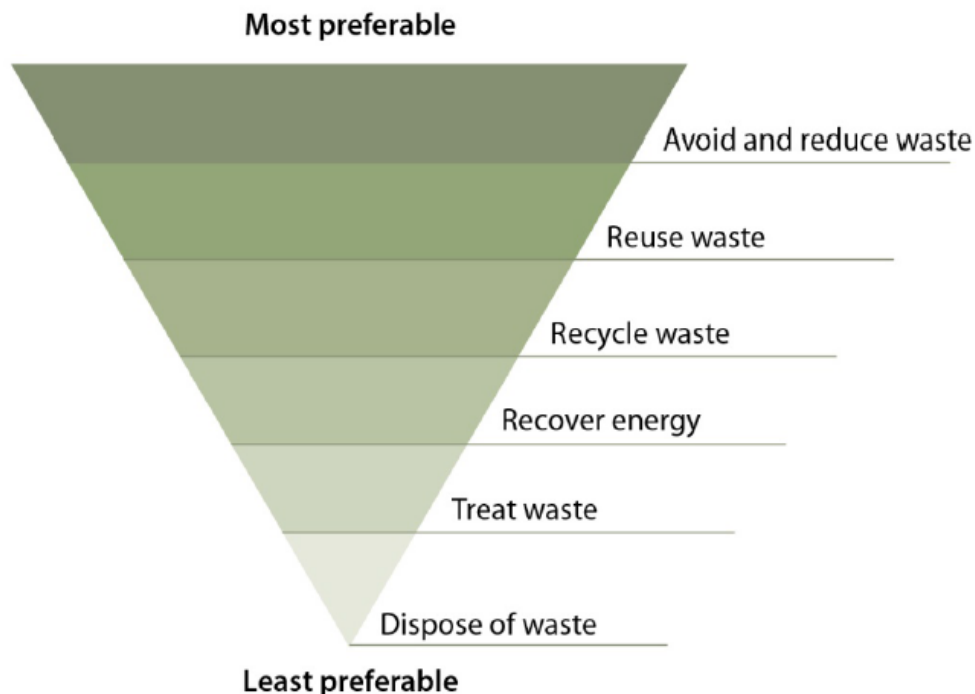


Figure 3 – Waste Hierarchy of Control

Waste is separated on site into different classes in accordance with the NSW EPA *Waste Classification Guidelines*. Before waste is removed from site it is assessed for suitability for the intended destination. Waste is classified into the groups identified in **Table 3**.

4.3 Waste Monitoring

Waste monitoring is undertaken at a corporate level. The focus of the monitoring program is to investigate and implement ways to reduce waste generation and increase recycling opportunities of the Existing Development.

4.4 Management of Waste Streams

Waste generated and/or stored at the premises is assessed and classified according to the NSW EPA *Waste Classification Guidelines*. Waste produced at the site is disposed of either by Borg staff or licenced contractors to licenced waste facilities.

The classification, management and disposal of wastes is outlined in **Table 3**.

Table 3 – Waste Classification, Management and Disposal

Waste Category	Source	Management	Disposal
General solid waste (putrescible)	Food scraps and wrappers from site personnel	No separation from general solid waste (non-putrescible)	Off site disposal at Oberon Council Licenced Waste Facility
General solid waste (non-putrescible)	Sanding belts	Collected in skip bins	Off site disposal at Oberon Council Licenced Waste Facility
	Heat plant ash	Stockpiled and disposed of to landfill as general waste	Off site disposal at Oberon Council Licenced Waste Facility
	Paint solids, filters, spillages and linings	Dried and disposed of to landfill as general waste	Off site disposal at Oberon Council Licenced Waste Facility
	Plastic strapping and wrapping	Collected in skip bins	Off site disposal at Oberon Council Licenced Waste Facility
	Cardboard cores and cardboard boxes	Collected in skip bins	Off site disposal at Oberon Council Licenced Waste Facility
	Treated paper	Collected in skip bins	Off site disposal at Oberon Council Licenced Waste Facility
	Waste resin (spade-able or solidified) and paraffin wax bladders	Collected in skip bins	Bathurst Council Waste Management Centre – Waste requiring burial
General solid waste (recyclable)	Bark, oversize and undersize woodchip, fibre, sawdust, wood trim, bearers and reject product	Stored on site	Fuel in heat plants
	Scrap metal	Metal recycling facility or reused on site	Off site to metal recycler
	Oil drums	Reused or returned	Off site to drum re-conditioner

Waste Category	Source	Management	Disposal
	Sludge (from WTP)	Stored on site	Fuel in heat plants
Liquid waste	Waste oil	Transpacific	Off site disposal by licenced contractor
	Brine (from WTP)	Oberon Council Trade Waste agreement or captured in MDF process	As detailed in <i>Surface Water Management Plan</i>
Hazardous waste	Chemical containers	Recycled, reused or disposed	Cleaned, cut up or crushed and sent to Oberon Council Licenced Waste Facility
Special waste	Asbestos waste	Asbestos register	Off site disposal by licenced contractor
	Waste tyres (any used, rejected or unwanted tyres including shredded or tyre pieces)	Tyres collected and stored on site for disposal as required	Off site disposal by licenced contractor

4.5 Waste Storage Areas

Designated waste storage areas are provided at various locations around the facility as follows:

- Paper treater building;
- Board offcuts bins in various locations;
- Metal recycling bins at various locations;
- Small waste bins throughout the facility; and
- Large waste bin on northern road.

4.6 Waste Minimisation and Avoidance

Borg Panels aim is to avoid and reduce waste wherever possible. Borg Panels has implemented a waste minimisation program by:

- Waste monitoring and tracking to enable Borg Panels to account for trends in waste generation and set targets for reduction where possible;
- Incorporating information on waste classification and disposal into personnel training and communication material;
- Provision and clear identification of separate waste stream disposal bins and/or locations; and
- Discussion of opportunities for waste minimisation during staff and contractor meetings.

4.7 Waste Receipt and Handling On-Site

As described in **Section 2.4**, EPL 3035 allows specified waste to be received at the premises and stipulates use of that waste during operation of the Existing Development.

5 Incidents and Complaints Management

5.1 Incidents

Any environmental incident relating to waste management will be managed in accordance with the procedures in the Operational Environmental Management Plan (OEMP).

5.2 Complaints

Community complaints will be managed in accordance with the procedures in the Operational Environmental Management Plan (OEMP).

5.3 Non-Compliances

In the event it is determined that a non-compliance with waste legislation has occurred, notification procedures will be as per the Operational Environmental Management Plan (OEMP).

5.4 Contingency Planning

If any unclassified waste material is encountered it is to be classified in accordance with the NSW EPA *Waste Classification Guideline* prior to disposal off site by a licenced waste contractor to a licenced waste facility.

Any emergency involving the generation of waste is to be managed in accordance with the Borg Panels *Emergency Response Plan*.

6 Monitoring and Review

6.1 Inspections

The Yard Supervisor is responsible for managing waste on a daily basis. The Yard Supervisor undertakes daily inspections and arranges weekly disposal of waste to landfill, and other collections as required.

Regular inspection of waste storage facilities is also undertaken as part of routine environmental inspections.

6.2 Waste Tracking

Waste generated by Borg Panels is weighed by either the licenced waste disposal contractor or receiving waste management facility. Oberon Council receive waste based on a cubic metre volume. The following details are recorded:

- Amount and classification of waste transported;
- Date transported;
- Name and location of the receiving waste facility; and
- Processing (whether disposed or recycled).

Borg Panels undertakes a review of waste management data on an annual basis and reports the findings in the Annual Review report.

6.3 Documentation and Record Keeping

Borg Panels retains all records of waste disposal for traceability, including:

- Waste receipts; and
- Waste Transfer Certificates.

Records relating to waste disposal are kept for a minimum of 4 years.

6.4 Reporting

Relevant information relating to waste management will be reported by Borg Panels as follows:

- Annual Review. A copy of the Annual Review is sent to relevant stakeholders, including DP&E, EPA and Oberon Council and is available on the Borg website.

6.5 Review and Auditing of this Plan

In accordance with Development Consent SSD 7016 Condition C10, this WMP will be reviewed and if necessary revised within 3 months of an:

- Approval of a modification;
- Submission of an incident report under Condition C13;
- Approval of an Annual Review under Condition C11; or
- Completion of an audit under Condition C15.

Revisions to the WMP will be submitted to the Secretary DP&E for approval.

Appendices

Appendix A – Correspondence



Contact: Pamela Morales
Phone: 9274 6386
Email: pamela.morales@planning.nsw.gov.au

Our ref: SSD 7016

Mr Victor Bendeovski
Environmental and Regulatory Compliance
Borg Construction Pty Ltd
2 Wella Way
SOMERSBY NSW 2250

Dear Mr Bendeovski

**Borg Panels Timber Processing Facility, Oberon, (SSD 7016)
Operational Environmental Management Plan – Condition C4**

I refer to your recent correspondence and submission of the Operational Environmental Management Plan (OEMP), Rev 1, and associated sub-plans for the existing medium density fibreboard (MDF) facility prepared by Borg Construction Pty Ltd (Borg) and dated 30 November 2017.

The Department has reviewed the OEMP and its associated sub-plans for the MDF facility and is satisfied they meet the terms of the relevant conditions of consent. Accordingly, the OEMP for the MDF facility has been approved pursuant to Condition C4 of the above consent.

Please ensure that all recommendations and measures outlined in the OEMP and its associated sub-plans are fully implemented.

You are also reminded that prior to the commencement of operation of the particle board facility, you must update the OEMP to include details of the particle board facility and its management. The updated OEMP must be re-submitted to the Secretary for approval.

Should you have any further enquiries, please contact Pamela Morales on 9274 6386.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'C. Ritchie'.

Chris Ritchie 21/12/17.
Director
Industry Assessments
As delegate for the Secretary