

ANNEXURE 1

Requirements for EA

**issued by
Secretary of the Department of Planning
and other Government Agencies**

**22, 24, 171 and 220
Bolong Road, Bomaderry**

Info

From: Deana Burn <Deana.Burn@planning.nsw.gov.au>
Sent: Wednesday, 14 March 2018 9:43 AM
To: Stephen Richardson; 'Brian Hanley'
Subject: MOD - Specialty Product Processing Facility, Gluten Dryer, etc. - Environmental Assessment Requirements

Hi Stephen,

I refer to your request for environmental assessment requirements for the above MOD. I understand the proposed modification involves:

- an increase in flour, gluten and starch production
- a third flour mill within the existing flour mill building
- a new industrial building to house a new gluten dryer and equipment for making modified gluten and modified starch products
- new baghouse on existing starch dryer no. 5
- a coal-fired cogeneration plant and new coal fired boiler
- new indoor electrical substation to increase power supply
- add a second storey to an existing electrical substation
- new ventilation systems on the two existing flour mills
- conversion of two gluten dryers to starch dryers
- relocation of one boiler
- relocate one approved DDG dryer
- an additional rail intake pit
- a new bucket elevator(43m high) to transport grain to the silos, connecting conveyors and chutes

I note your scoping report identifies the need for the following studies, in accordance with relevant guidelines:

- air quality and odour
- noise
- preliminary hazard analysis
- traffic, access and parking
- flooding
- wastewater treatment
- visual
- acid sulphate soils
- contamination
- riverbank stability

In addition, the EPA have provided the detailed requirements for various studies below.

Air Impacts

It is recommended that an air quality impact assessment be prepared in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016)*. This needs to include specific assessment of impacts from odour and other principal air pollutants arising from the proposal. As required by the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016)* the required air quality impact assessment needs to be cumulative based (incorporating current plant and equipment configuration/operation, approved but yet to be constructed plant and equipment and proposed plant and equipment the subject of the modification) and must be undertaken to present a worst case scenario prediction of air quality impacts from the premises. In this respect, the previous air quality impact assessments (final version), including odour inventories and assessment methodology for past modifications for the Shoalhaven Starches site, in particular MOD 13 and MOD 11 should likely be used in the formulation of the required air quality impact assessment for the proposed MOD.

If any exceedances of the relevant air quality assessment criteria are identified, the air quality impact assessment report should detail all reasonable and feasible mitigation measures that will be implemented to ensure compliance.

Further, the EPA understands the proposed MOD will also be seeking to move one of the DDG dryers approved under MOD 11 from the approved location on the western side of the factory plant, to an alternative location on the eastern side of Abernethys Creek. The air quality impact assessment report must detail whether this proposed location change will result in additional odour impacts from the premises and should clearly detail any changes that have been included in the odour assessment modelling such as building wake effects in comparing the two DDG dryer locations.

Noise Impacts

It is recommended that a noise impact assessment be prepared in accordance with the *Noise Policy for Industry (EPA, 2017)*. The noise impact assessment should assess whether the proposal will comply with the noise limits for EPL 883, and provide details of all reasonable and feasible mitigation measures that may need to be implemented to ensure compliance. Please note the EPA in consultation with Shoalhaven Starches is currently in the final processes of updating the noise descriptor used to express the limits in EPL 883 (changing from LA10 to LAeq). As such, it is recommended that the noise impact assessment be reflective of the updated noise descriptor limits which are likely to be finalised in EPL 883 shortly.

In addition, any potential construction noise and vibration impacts should be assessed in accordance with the *Interim Construction Noise Guideline (DECC, 2009)* and should the assessment methodology (quantitative or qualitative) should be clearly identified in the report.

Soil Contamination

It is noted in the scoping report that a site contamination assessment is proposed to be undertaken at the site. It is recommended that the assessment should include details on what action will be taken if contaminated soil was found on site.

Water Pollution

Consideration of environmental controls that will be put in place in to ensure that any construction works undertaken on the site will not contravene section 120 of the POEO Act (prohibition of the pollution of waters). Any sediment and erosion controls should be applied in accordance with the *Blue Book (Landcom, 2004)*.

Dust Management

Consideration of any dust management practices that will need to be in place during construction site is required to reduce the potential for the pollution of air and waters and to minimise the impact on the amenity of the surrounding community.

Waste Management

Consideration to the management of all wastes generated during the project, including the potential disturbance/removal of acid sulphate soils. The wastes must be managed in a manner that prevents the pollution of waters and air. Waste must be classified in accordance with the POEO Act and *Waste Classification Guidelines (EPA, 2014)* and must be taken to a place which can lawfully receive them in accordance with the requirements of the POEO Act. In addition, should any waste be imported to the site for construction purposes, consideration should be given to whether a Resource Recovery Order/Exemption applies.

In addition to the above requirements, the Department requests that your Environmental Assessment include a simple list of all proposed modifications with a cross reference to figures showing the location of each modification.

Regards
Deana.

Info

From: Stefan Press <Stefan.Press@epa.nsw.gov.au>
Sent: Friday, 2 March 2018 8:53 AM
To: Deana Burn; Stephen Richardson
Cc: Brian Hanley (brian.hanley@manildra.com.au); John Studdert (John.Studdert@manildra.com.au); Matthew.Handicott@manildra.com.au
Subject: RE: EPA Environmental Assessment Requirements - Proposed MOD 14
Attachments: RE: Proposed Modification Application, MP06_0228 Shoalhaven Starches Expansion Project, Proposed Specialty Product Processing facility, Modifications to Flour Mills and other Associates Works, 22 & 24 and 171 Bolong Road Bomaderry; Proposed Modification Application, MP06_0228 Shoalhaven Starches Expansion Project, Proposed Specialty Product Processing facility, Modifications to Flour Mills and other Associates Works, 22 & 24 and 171 Bolong Road Bomaderry; Proposed Modification Application, MP06_0228 Shoalhaven Starches Expansion Project, Proposed Specialty Product Processing facility, Modifications to Flour Mills and other Associates Works, 22 & 24 and 171 Bolong Road Bomaderry

Hi Deana and Stephen

I have just realised that I have referred to the latest proposed Shoalhaven Starches modification as MOD 14 in my recent correspondence to you both concerning the EPA's environmental assessment requirements. Obviously MOD 14 relates to the old paper mill site and which is currently on public exhibition at present and so assume the proposed modification will likely be MOD 15? So for clarity, the environment assessment requirements provided below relate to this latest proposed MOD and which the EPA understands to include the proposed changes at the premises as outlined in Stephen's emails of 9 and 27 February 2018 which are also attached for clarity/completeness.

Apologies for any confusion caused by my miss reference.

Regards

Stefan Press

Unit Head – South East Region

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Please send all official electronic correspondence to queanbeyan@epa.nsw.gov.au

From: Stefan Press
Sent: Friday, 2 March 2018 8:25 AM
To: Deana Burn <Deana.Burn@planning.nsw.gov.au>
Subject: EPA Environmental Assessment Requirements - Proposed MOD 14

Hi Deana

Further to our discussions on Wednesday, please find below the EPA's environmental assessment requirements for the preparation of an EA for Shoalhaven Starches proposed MOD 14.

Air Impacts

It is recommended that an air quality impact assessment be prepared in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016)*. This needs to include specific assessment of impacts from odour and other principal air pollutants arising from the proposal. As required by the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016)* the required air quality impact assessment needs to be cumulative based (incorporating current plant and equipment configuration/operation, approved but yet to be constructed plant and equipment and proposed plant and equipment the subject of the modification) and must be undertaken to present a worst case scenario prediction of air quality impacts from the premises. In this respect, the previous air quality impact assessments (final version), including odour inventories and assessment methodology for past modifications for the Shoalhaven Starches site, in particular MOD 13 and MOD 11 should likely be used in the formulation of the required air quality impact assessment for proposed MOD 14.

If any exceedances of the relevant air quality assessment criteria are identified, the air quality impact assessment report should detail all reasonable and feasible mitigation measures that will be implemented to ensure compliance.

Further, the EPA understands that proposed MOD 14 will also be seeking to move one of the DDG dryers approved under MOD 11 from the approved location on the western side of the factory plant, to an alternative location on the eastern side of Abernethys Creek. The air quality impact assessment report must detail whether this proposed location change will result in additional odour impacts from the premises and should clearly detail any changes that have been included in the odour assessment modelling such as building wake effects in comparing the two DDG dryer locations.

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2014) and must be taken to a place which can lawfully receive them in accordance with the requirements of the POEO Act. In addition, should any waste be imported to the site for construction purposes, consideration should be given to whether a Resource Recovery Order/Exemption applies.

I trust that this is of assistance and should you wish to discuss further, please don't hesitate to get back in contact.

Regards
Stefan

Stefan Press

Unit Head – South East Region

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Info

From: Andre Vernez <Andre.Vernez@shoalhaven.nsw.gov.au>
Sent: Monday, 14 May 2018 3:53 PM
To: Stephen Richardson
Subject: Proposed Modification to Project Approval MP06_0228 (Proposed New Specialty Product Processing Facility etc.), Shoalhaven Starches Expansion Project, Bolong Road, Bomaderry

Dear Steve,

Apologies for the delay in response.

Please find below comments from Shoalhaven City Council in response to your email dated 6 March 2018, in relation to Shoalhaven Starches proposed modification to Project Approval MP06_0228, for a proposed new specialty product processing facility, gluten dryer, modifications to flour mills (including installation of additional flour mill "C") and other associated works at Lot 21 DP 1000265 (22 Bolong Road), Lot 201 DP 1062668 (24 Bolong Road) and Lot 241 DP 1130535 (171 Bolong Road) in conjunction with their current factory operations.

In summary, Council does question whether this proposal would be a modification of the original approval or rather a new project in its own right, in accordance with the provisions of section 4.55 of the Environmental Planning and Assessment Act 1979.

Comments have been segregated relating to the relevant sections of Council.

Traffic & Transport Comments/Requirements:

1. A Traffic Impact Assessment (TIA) is required with consideration of the identified traffic and transportation issues, particularly confirming the car parking requirements for the proposed development and the ongoing needs of the site/s.

Development Engineering Comments/Requirements:

2. Stormwater runoff from the proposed development needs to be addressed and where and how the stormwater discharges.

Environmental Health Comments/Requirements:

3. Compliance is required with the recommendations of the Noise Impact Assessment by Harwood Acoustics Pty Ltd (dated December 2017).

Flooding Comments/Requirements:

4. The sites are categorised as high hazard floodway and high hazard flood storage. A detailed flood compliance assessment report is required on how the proposal will achieve all relevant objectives, performance criteria and/or acceptable solutions of Shoalhaven Development Control Plan 2014, as prescribed in Section 5.1 and 5.2 of Chapter G9.

It appears that the flood levels shown on page 8 of the scoping submission dated 8 February 2018 is not accurate. The 1% AEP event flood level for the properties at 22 and 24 Bolong Road is 5.7m AHD.

5. Given the proposed riverbank stability works adjacent to Shoalhaven River, a setback of a minimum 11.5m is required for all permanent structures. All shipping containers and fencing in the south-east of the proposed development area are to be relocated to comply with this setback from the riverbank.

Building Comments/Requirements:

6. It is assumed that any application will be referred to NSW Fire & Rescue for comment.

Should you have any questions in relation to the above please give me a call.

Regards,

Andre Vernez

Acting Unit Manager – Development Services Nowra

Shoalhaven City Council

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